

NFA submission to the Housing Ombudsman call for evidence: Investigation into damp and mould

Introduction

The National Federation of ALMOs (NFA) (www.almos.org.uk) is the trade body which represents all housing Arms' Length Management Organisations (ALMOs) across England. ALMOs manage nearly 350,000 council homes across England. The NFA represents the interests of ALMOs at the national level and provides advice and support for members. Our members range from small district ALMOs in Cornwall to large urban ALMOs in London, Manchester and Newcastle.

Our response summarises the key issues around damp and mould for all our landlords and some good practice we believe could be shared across the whole sector.

Summary

The NFA asked its members' views on the five questions the Housing Ombudsman set out in its call for evidence for its investigation into damp and mould.

The responses highlight that although there have been some terrible cases recently in the media, highlighting the appalling conditions some social housing residents have had to endure and the terrible service they received from their landlord, this is not representative of the sector as a whole. We do not profess that our sector is by any means perfect but that our members are committed to responding to any such issues swiftly and to residents' satisfaction as far as possible.

Our members aim to provide good quality homes that are safe and secure, and ultimately help people to get on in life. However, this investigation has highlighted that in some cases of damp and mould, difficult-to-remedy, ongoing problems for both tenant and landlord are caused by historic poor building design and quality in the sector combined with the social conditions of many tenants who are unable to afford to properly heat and ventilate their homes and who sometimes live in overcrowded conditions.

Arms-length management organisations (ALMOs) were first established in 2002 as part of a drive to improve services and homes for tenants. They were set up alongside a performance regime which ensured that only councils with well-performing ALMOs received the funding to improve their homes up to Decent Homes Standards. This framework and incentive regime led to a considerable improvement in housing management services, housing conditions and a new positive working culture within council housing organisations, as evidenced by the Audit Commission inspection ratings at the time. As a result of that investment in our sector we do

believe that cases of damp and mould have reduced since the early 2000s and where there is available investment within the HRA Business Plan many members are looking to include improvements like ventilation and recovery units (MVHR).

However, as the Government is aware, the Decent Homes Standard is a minimum standard. It is now 20 years old and some homes still require further energy efficiency work to improve conditions. Additional government funding is required in many places to deal with these harder-to-heat homes which will need substantial refurbishment to improve thermal warmth, damp and condensation. Some may require demolition and rebuilding as part of wider regeneration schemes.

A severe lack of social housing in most areas of the country also drives overcrowding in the social homes which are available and prevents social landlords from moving overcrowded families to more suitable homes. A significant increase in Government funding for social housing is required to properly address the scale of need for decent, secure and affordable housing, and we urge the Government to seriously consider that in the forthcoming Spending Review.

The Government also needs to review its welfare policies to ensure that the most vulnerable people, living in some of the poorest housing, can afford to heat their homes adequately to prevent the build up of condensation and then mould. Our members try to support many tenants who are reliant for various reasons on welfare benefits, and often also have to ask for food bank vouchers and turn off the heating because the money they are given is just not sufficient to support their most basic needs.

In spite of these challenges our members have shown that there are actions managing agents and landlords can take to deal with problems of damp and mould and resolve or manage situations in the best possible way.

- **Repairs services**, from the call centre to the operatives and surveyors visiting the property, are the key to a good response for customers. NFA members highlight the need for well-trained staff across the whole service so they recognise these issues quickly and make an appropriate response. They recognise the value of good logging of data and analysis to identify trends or problems in, for instance, certain property types so that solutions can be tested and then rolled out as normal practice.
- **Sharing of information and data** across the housing management service is vital so that customers are really listened to, and tenants' views and particular circumstances are built into solutions. Where particular problems are identified, NFA members look at the possibility of specialist teams or staff to really get a handle on the issue.
- The final area of good practice is in improving **information and education** to tenants on how to manage condensation in their homes. Some members have seen a reduction in complaints since they started to do this through the use of leaflets, information packs and home visits by specialist officers.

We therefore urge the Housing Ombudsman and all social housing organisations to share good practice in all areas relating to dealing with damp and mould in tenants' homes and continue to both improve services and homes for tenants.

Questions

1. What do you consider to be the main cause(s) of damp and mould?

Our members manage a wide range of different property types across the country and the causes of damp and mould depend on the type of construction and age of each property, and on the living conditions of their tenants.

However, our members report several common causes.

The main cause of actual damp is water ingress from either leaking internal plumbing or external rainwater caused by broken or blocked guttering, missing roof tiles, damaged windows or doors or missing pointing in brickwork.

However, the main cause of mould growth and tenant-reported damp is the settling of atmospheric moisture on cold spots, forming condensation. This moistness then enables the growth of black surface mould. This is caused by a variety of factors. Property issues and human issues often interact:

- **Housing with poor thermal performance:** e.g. 1960s concrete buildings with cold-bridging, concrete floors with no insulation or homes with single brick wall construction. This leads to higher heating costs and loss of heat, and is often a cause of condensation and subsequently mould growth. Poor or no loft insulation or wind wash effect at eaves can cause cold spots on ceilings; some solid floor abutments with walls can have the same effect. Broken extractor fans or broken heating systems will also create the conditions for condensation to form. Homes with centralised bathrooms and limited ventilation, structures that are nearing the end of their life, and non-standard construction types are all more likely to suffer from condensation.
- **Fuel poverty:** not heating homes fully and consistently, combined with a desire to minimise heat loss and limit the expense of ventilation. So, for example tenants preventing ventilation in kitchens and bathrooms by switching off fans, disconnecting systems (often due to the belief they are too expensive to run), closing trickle vents and not opening windows where possible.
- **A lack of knowledge on how to prevent, clean and manage mould growth:** not cleaning condensation off regularly, drying clothes inside without ventilation, an excess of belongings in a property and poor housekeeping leading to a lack of air circulation. Large items of furniture against external walls (sofas, beds, wardrobes etc.) which causes a lack of air circulation and cold spots. This enables the condensation and growth of mould spores where they are not easily visible or manageable until the growth is very large. Not

moving furniture away from walls when cleaning to check for and manage mould growth. Keeping curtains and blinds drawn, preventing good ventilation even when windows or trickle vents are open.

There are obviously some properties which need repairs to fix leaks or water ingress and prevent damp, and others which could be improved by some technical improvements such as mechanical ventilation or better insulation; but it is also clear that in a lot of properties, the problem of condensation is not easily remedied through small technical fixes. More major works may be required to improve thermal insulation or this might simply not be possible, and in some cases tenants may need to manage the problem themselves by changing their behaviours.

All of our members reported that many tenants either do not fully understand how condensation is created and therefore do not use the ventilation or heating systems available, or are in such poverty that they cannot afford to adequately heat their homes; to keep heat in, they actively choose not to use the ventilation available and close vents and disconnect electrical systems.

In many areas across the country there is a severe lack of larger properties for families and overcrowding then becomes an additional cause as more people use the bathroom, cook, live and sleep in the property and need to store possessions. This all makes it very hard for the tenants to adequately manage the problem.

2. Are the root causes of damp and mould difficult to identify? And if so, why?

Based on our members' responses, we would say that most of the time the root causes of damp and mould can be identified through a visual inspection of the property by a suitably qualified surveyor with appropriate tools such as a damp meter and a good knowledge of the stock and its inherent problems. An open discussion with the tenant about when and how the damp and mould started is also helpful.

However, some cases will always be more complicated because of the possible causes and the interaction between both property issues and tenant behaviours. If the cause is not immediately identifiable or the first repair/action carried out by the landlord does not remedy the situation further, more intrusive checks will be made to ascertain the root cause of the issue and more specialist staff will be used if necessary.

Members do report that rising damp is generally easily distinguishable from penetrative damp, and both are distinguishable from condensation. If damp or mould is due to a leak, sometimes it is difficult to find the source/leak, especially in high rise blocks or communal areas. Then remedying it is not always easy, especially if the leak comes from a leasehold flat or adjoining privately owned house where gaining access and getting the repair done can be difficult and take time.

Members' evidence is that the key to being able to identify the root causes of damp and mould is having well-qualified, experienced, customer-focused surveyors, technical staff and repairs managers who are willing and able to properly inspect and remedy these issues. Some of our members report regularly training in-house

repairs teams specifically to deal with damp and mould reports better or using specialist contractors where these issues are identified.

If condensation is identified as the problem, then the exact cause of condensation can be difficult to prove or deal with, especially if living conditions and/or fuel poverty are thought to be the cause. Members report that condensation is the most common cause of mould in bedrooms, bathrooms and kitchens. It is often difficult for the customer to accept that their behaviours in the home (by choice or necessity) are causing the problems, and this is an area which many landlords are trying to work on.

Some members have recently tried to improve their communication and support to residents through information packs, videos, and specialist officers to try to promote a better understanding of the causes of condensation and how to prevent mould.

3. Are the root causes of damp and mould difficult to address? And if so, why?

The level of difficulty in eradicating damp issues really depends on the cause. Effective remedial measures depend on accurate diagnosis and may involve nothing more than basic maintenance, such as clearing a blocked rainwater gulley or opening window vents. Severe dampness will involve more extensive works and the property may have to be vacated and emptied for the duration of the works. In some areas of the country, finding a suitable property for the tenant to move into is very difficult and may significantly delay the necessary work.

Some root causes are more complicated to resolve than others; for instance, roofing, guttering or chimney works which require extensive scaffolding, and privately owned neighbouring properties can also cause complications – in terraced housing, especially for finlock guttering, or in blocks of flats with private owners who may also be landlords.

Generally, most damp/ mould problems associated with building defects can be remedied and the following work would typically be done:

- Remove fixtures and fittings
- Hack off plaster
- Inject chemical DPC
- Replaster
- Refit/ renew fittings
- Decorate
- Repair root cause of the leak
- Carry out mould-wash
- Offer advice to our customers

However, underlying issues caused by building design and, in particular, buildings of concrete construction or traditional solid type construction with cold walls and poor thermal performance are often well understood, but solutions can be more difficult as

they demand substantial improvements to the buildings. Examples are thermal cladding systems and heat recovery ventilation systems. Pending more substantial improvements to buildings, solutions are often targeted at the symptoms through work such as:

- Dry lining internal walls
- Condensation damp monitors
- Mould wash treatments
- Atmospheric controlled ventilation systems
- Insulating the floor to improve the thermal value (cold bridging) and thermal boarding the walls (lounge, bedroom).
- Extractor fans might be fitted in the kitchen or bathroom
- Advice to residents on how to limit mould and condensation in the home

However, if at least part of the problem is due to living conditions in the property over which the landlord has no control (such as overcrowding or poverty) then it is sometimes more difficult to get the tenant and their household to engage with the solutions.

Some of the solutions are of a delicate nature in so far as it regards the behaviour of the tenant in their own home. Members report that, understandably, tenants do not always appreciate being told that they need to clean more or to use appropriate cleaning products. They can feel offended and become defensive. A number of tenants are not well equipped to look after their home as well as they would like through mental illness, disability, limited time or lack of money.

These are all sensitive issues, and these cases are resource-intensive and require regular engagement with the residents. The main problem is ensuring tenants understand the part they play in managing condensation mould. If the tenant does understand but cannot afford to put the heating on, then the issue is one of poverty and although landlords do provide advice and support this cannot always address a fundamental lack of money.

Members tell us that overcrowding is a key contributor to condensation inside the home, which can in turn lead to mould growth. As the demand for social housing greatly outweighs supply even in areas often considered more affordable this is a problem for all our members at various times.

Most of our members have new-build programmes either through the council or the ALMO and are trying to address that demand, but these programmes are small due to the scale of funding available and in most years do not even replace the homes sold through the right to buy.

4. While damp and mould issues are being looked into, what support is offered to residents to ensure they can live in a hygienic environment?

Options available from members range from information and advice on how to clean and prevent mould via leaflets, videos, website information, telephone conversations or through a visit, through to technical assistance such as the fitting of ventilation systems or additional insulation.

Where there has been a flood or a severe leak or water ingress, then members offer services such as Aquavac, chemical clean-up teams and dehumidifiers to speed up the drying out of damp walls. Kitchen units and surfaces would be replaced if badly affected.

Mould washes are often routinely ordered for severe cases. Many landlords will provide equipment to the tenant to measure temperature and humidity to help monitor the situation. Some ALMOs are now training or hiring staff to specifically advise on these issues as well as providing fuel poverty advice, money advice and similar assistance if that need is also identified.

If the issues are more complicated and require more investigation time or larger remedial works, most members report they would clean down affected areas such as black spot mould with the correct sterilizing solutions. They would then offer technical solutions for customers either from internal staff or in some cases from specialist sub-contractors to get the issue resolved in the quickest time possible.

If hoarding is identified as a problem, then many of our members offer a specialist hoarding support service through an intensive housing management offer.

Most members reported that they would look to find alternative accommodation if the problems were likely to affect the tenant's health or if the works required are substantial, but this is not always wanted by the tenant and can prove difficult for the landlord to find.

5. Has a particular damp and mould situation led to significant changes in the way in which a landlord operates? If so, please provide details.

A very small number of our members have identified issues with damp and mould in their properties, either from a particular complaint or through noticing a large number of similar repairs requests or complaints.

Where issues have been identified, the following changes have been made:

- In one ALMO, a specialist team was trained in the diagnosis of dampness and condensation and how to put in place the correct remedial actions. They were given measuring and test equipment to support accurate initial diagnosis and then a new post-inspection visit regime was instituted. Follow-up visits take place at 6 to 8 weeks and three months to check remedial action has worked and any lifestyle issues the tenant may have that contributed to the condensation have been resolved. They report that this has proved very successful in dealing with the more problematic cases.
- Others have procured specialist contractors to help deal with the issues.

- Another ALMO reported that training all their technical and repairs staff around five years ago revolutionised how they identify the cause of damp, condensation and mould. By using data to measure humidity in properties, they now have the tools to help identify the root cause.
- One organisation has made the complaints team responsible for managing the disrepair protocol and has directly employed a surveyor. This enables them to proactively respond to reports of damp and mould, to investigate and provide suitable resolutions to try to prevent any cases becoming serious.
- Another ALMO has brought their repairs service back in-house and used this opportunity to improve their data collection and analysis of damp and mould problems. They are implementing a new pre-inspection process, including new forms with compulsory fields that include moisture readings in affected rooms, results of external inspection, review of mechanical humidity extraction, and ruling out potential causes such as leaks, roofing, heating. This ensures that the surveyor records minimum information. The expectations of surveyors have been documented and are to be part of the performance management framework from June 2021. They have also been reviewing potential technology options for surveyors, including relative humidity readers, and plan to implement an audit process through which managers will check a target sample of inspections to ensure quality and that commitments made have been followed through. Follow-up inspections are also being implemented for condensation issues, with a return appointment to be booked three to six months (depending on the time of year) after the first appointment is concluded for re-inspection. This will assess the effectiveness of any works undertaken or advice given and will compare moisture readings to the initial inspection. This will allow them to either demonstrate that the situation has improved, or identify a potential need to complete further, more intrusive, works to resolve the issue. Their aim with the revised approach is to ensure more robust pre-inspections with a focus on damp and condensation, creating a clear and auditable process.
- Another member has introduced a 'leaks group' that ensures an end-to-end solution with clear responsibilities and timeframes for action. They also extend their services to leaseholders and carry out emergency/make-safe works in leasehold homes and then provide follow-up advice on permanent remedies. The standard of new plumbing installations has also been upgraded to ensure a higher standard of plumbing repair.
- Building on information and data from their repairs analysis, one of our members is installing Positive Pressure Systems which are highly effective in reducing atmospheric moisture and preventing black mould growth. However, not all their homes are suitable for this upgrade due to their construction.

- Many members have focused on educating customers about the causes of condensation and what they can do to prevent it. Information is provided on websites and via regular newsletters. ALMOs often host energy advice surgeries and offer free home energy visits. Money Advice teams provide support to customers to find the best and/or most affordable utility tariffs and other support. During these visits, officers will assess the problem, advise customers on what action they can take, and also determine whether there are any practical measures the landlord can put in place to help ease the problem, such as thermal insulation on external walls to solve cold spots and thermal bridging.
- One NFA member identified damp and mould issues during preliminary surveys carried out as part of major improvement and regeneration project on a large estate and this data is being fed through to a wider building improvement programme will upgrade flats through a range of measures, including fire safety works, thermal improvements, and the replacement of flat roofs with pitched roofs to improve water run-off.
- Finally, one ALMO offers the example of how their repairs team work closely with colleagues in Asset Management and their Technical Project and Design teams to work together to resolve issues on an estate basis. They share information and collaborate on programmes such as external wall insulation to improve thermal qualities of properties, fuel-switching programmes, improved heating and fuel poverty reduction. Where they have identified design faults causing cold spots, they have added internal insulation where possible to minimise condensation. Heating in some properties has been enhanced with new radiators where the original build and specification did not allow for them. In multi-storey mid- and high-rise blocks, they have designed and fitted bespoke mechanical ventilation systems. Ventilation has been improved by the fitting of PIV (Positive Input Ventilation) units in many properties. A PIV unit is a whole house air ventilation system that works by drawing in fresh, filtered air into a property from outside. These can be either installed in a loft space or on a wall in a flat or apartment. They also ensure that staff complete a minimum of 10 hours CPD (Continual Professional Development) on current legislation, advice from the Building Research Establishment (BRE) good repair guides 5 - 9, & 33 (parts 1,2, & 3) and Understanding dampness: effects, causes, diagnosis and remedies (BR466) by Peter Trotman (available through BRE press).