

Housing & Regeneration Policy and Scrutiny Committee

Date of meeting:	Wednesday 12 th March 2025
Classification:	General Release
Title:	Damp and Mould
Report of:	Heather Clarke, Director, Housing Needs
Cabinet Member Portfolio	Cabinet Member for Housing
Wards Involved:	All
Policy Context:	To drive our vision for a Fairer Westminster – one that through housing, puts residents first – we have formed the Housing Compact with registered housing providers across the city to foster collaboration, share best practices, and co-develop initiatives to improve the lives, homes and communities of Westminster residents.
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1 Executive Summary

- 1.1 To provide an update on the Housing Compact and to scrutinise the approach registered providers in the borough are taking to addressing and preventing damp and mould in their properties

2 Key Matters for the Committee's Consideration

- 2.1 To review the effectiveness of Registered Providers (RPs) in the borough with regards to damp and mould, with key considerations including:
 - the Housing Compact commitments to safe and healthy housing and how this is being enacted
 - proactive and reactive approaches to addressing damp and mould within registered provider housing stock.

- Registered Provider readiness for meeting the requirements of Awaab's law.
- 2.2 Members are invited to consider, provide feedback and make recommendations on the success of addressing damp and mould in the borough.

3 Background, including policy context

- 3.1 Damp and mould issues have been identified as a major concern in the social housing sector, both in the scale and persistence of the problems. This problem is as prevalent amongst RPs as it is local authorities. Collectively, both sectors are on a considerable journey to address the scale of this challenge with a number of changes to processes and training for staff implemented.
- 3.2 The government estimates across the social housing sector 3-4% of the four million social housing homes have at least some notable damp and mould, 1-2% have serious, Housing Health and Safety Rating System (HHSRS) category 2 damp and mould problems, and less than 0.2% have the most serious, HHSRS category 1 level, problems which would fail the [Decent Homes Standard](#).¹ These are not acceptable conditions for tenants to be living in, even if the proportions are relatively small, this still amounts to around a quarter of a million homes in the UK.
- 3.3 This paper outlines the progress being made by RP partners and actions being taken to address both reactive management of incidents and proactive measures to prevent damp and mould from occurring in the first place.
- 3.4 The Housing Ombudsman Service published a spotlight report on Damp & Mould in October 2021 that made recommendations to Social Landlords and how they should change their approach to these cases in 4 areas:
- Move from a reactive to a proactive approach
 - Take responsibility for the issue, rather than inferring blame
 - Ensure disrepair cases are resolved
 - Adopt a learning culture from complaints
- 3.5 Further to this, the Social Housing Regulation Act 2023 saw the creation Awaab's Law following the tragic death Awaab Ishak as a result of exposure to damp and mould. The Government consulted on the implementation of this law but has not yet formally published the outcome of the consultation. However, it was confirmed

¹ [Damp and Mould in Social Housing: initial findings 2023](#)

in February 2025 that the law will come into force in October 2025, initially targeting damp and mould hazards.

4 The Housing Compact

- 4.1 Westminster City Council (WCC) is committed to building a '*Fairer Westminster*' putting residents at the heart of our decision making, helping determine the city's future because their voices are heard. The Council is creating a more equitable and inclusive city by addressing the social, economic, and environmental challenges faced by residents, particularly those from marginalised communities.
- 4.2 In November 2024 the Council launched the *Westminster Housing Compact* with 11 registered housing providers across the city to foster collaboration, share best practice, and co-develop initiatives to improve the lives, homes and communities of Westminster residents. The Westminster Housing Compact is comprised of the Council and the following partner organisations:
- A2 Dominion
 - Dolphin Living
 - London and Quadrant (L&Q)
 - Notting Hill Genesis
 - Octavia Housing
 - Peabody
 - Sanctuary
 - Soho Housing Association
 - Sovereign Network Group
 - Waltherton and Elgin Community Homes (WECH)
 - Westminster Community Homes (WCH)
- 4.3 Recognising this is a partnership between the Council and social housing providers who have housing stock within the Borough, a key objective of the Housing Compact is to seek to achieve real outcomes for residents in the face of the London housing crisis. This is focused on improving the quality and consistency of housing across the city and social landlords. This group will work together to respond to the significant challenges facing Westminster, tackling homelessness, overcrowding, and improving housing conditions.
- 4.4 Recognising the scale of the issue and the commonality of the challenges facing all housing providers, damp and mould has been identified as one of the top priorities for the first year.
- 4.5 The Housing Compact has established a Housing Compact Strategic Leadership Group, chaired by the Cabinet Member for Housing Services, to ensure proper governance and oversight the agreed priorities. This will include a focus on damp and mould.

5 The scale of the issues for Registered Providers

- 5.1 The Compact Taskforce, chaired by the Westminster Director of Housing Needs and led by the Directors of the Registered Providers, held its first meeting on 11

February 2025, during which the issues of damp and mould were discussed in detail to share an understanding of the issues being faced by each partner.

- 5.2 It is widely acknowledged that tackling Damp and Mould remains one of the most pressing issues currently being faced by housing providers across the UK, and Westminster is not an exception. Whilst progress is being made, no housing provider - irrespective of sector - can claim to have delivered a fully successful response.
- 5.3 Overcrowding, the current cost of living, fuel poverty, the age and design of older properties are exacerbating the issue. However, RPs are looking at positive and proactive measures to tackle this at the root cause as well as working through remedial works. In many ways, this is no different to the Council's approach. The scale of this problem varies amongst RPs, the table below provides an indication of the impact based on analysis of providers currently signed up to Westminster's Housing Compact.

Registered Provider	Total homes in Westminster	Volume of complaints	Number of homes affected (Westminster)	Number of cases resolved
A2Dominion	1,284	40	220	38
Dolphin	103	1	28	28
NHG	3100	48	185	29 (340 repairs completed)
Octavia	1955	79	49	Data not available
Peabody	5324	10	220 (Since start of new contract in Oct '24)	158 (Since start of new contract in Oct '24)
Sanctuary	639	13	143	134
SNG	1338	1	18	10
WCH	438	64	64	50
WECH	498	174	c 110 (Inspections in progress)	64

Table 1. Information provided from RPs regarding the scale of the issue each organisation is facing. Data refers to the last financial year (2024-25)

6 Measures (summary of evidence)

Reactive Measures

- 6.1 In response to this Committee's request, officers undertook a period of evidence gathering with RPs in January and February 2025 to examine their approach to damp and mould. An overview of this is summarised below.
- 6.2 The evidence gathered notes that, much like the council, reports can be raised through a number of channels (such as phone, email, and online portals). Whilst response times vary, providers generally prioritise cases based on vulnerability and severity. Some registered providers (e.g. Sanctuary, NHG) have dedicated teams to triage and escalate cases, while others rely on their general maintenance and asset management teams.
- 6.3 Measures to deal with damp and mould issues vary depending on the severity of the case and the needs of residents. Minor remedial works may include cleaning, improving ventilation through repairs, or installing extractor fans. Major remedial works can involve structural repairs and repairing insulation and heating systems. In cases where residents need to be rehoused due to extensive works needed or severe health risks, registered providers arrange temporary accommodation or find long term solutions according to their internal policies (e.g. housing allocation) in line with the residents' needs.
- 6.4 Acknowledging the importance of communication, residents are generally kept informed regarding inspection findings, clarifying actions needed and timeframes for completion, following each visit and throughout the repair process, as necessary depending on each case. They also receive information and guidance on how to prevent further damp and mould issues before, during and after visits.
- 6.5 RPs' policies vary when it comes to monitoring after the repair works have been completed. These can include a quality assurance inspection upon work completion by qualified professionals (NHG, WECH), a customer satisfaction survey (NHG), monitoring through additional visits at regular intervals or by contacting the residents after a certain amount of time to confirm that the issue has been addressed and hasn't reoccurred (e.g. Dolphin Living, L&Q, WECH).
- 6.6 In response to Awaab's law, all RPs have reviewed or are in the process of reviewing their damp and mould policies. All are looking into ways to make their repairs' process more efficient; some, like Sanctuary and NHG, have a more defined plan for doing that, by restructuring their services, producing standard industry templates, having their processes reviewed by third parties and improving their oversight, governance and outcomes' scrutiny.

Proactive measures

- 6.7 Data remains a key focus, but methods vary in terms of the information collected and frequency of the updates. Some, like NHG, collect data through stock condition surveys every few years. This includes resident feedback and general maintenance reports, as well as technology-driven methods such as aerial image analysis to identify high-risk buildings. Some registered providers also have

dedicated tracking dashboards to monitor trends and prioritise interventions (Sanctuary).

- 6.8 All registered providers contacted as part of this research conduct routine inspections on properties. Frequency varies but this can mean annual visits to all social rented properties in the case of NHG and L&Q who also increase frequency of inspections to properties with a higher risk of damp and mould. Inspections are also carried out by all RPs on void properties before these are occupied, to identify and address issues before they occur, i.e. checking for any signs of damp, that ventilation and heating systems are in good mechanical order and whether existing insulation is sufficient.
- 6.9 Based on responses and information collected, all registered providers invest in property improvements, including insulation, heating, and ventilation systems, to ensure homes have the right equipment to prevent damp and mould. Some registered providers are trialling innovative approaches, such as the use of smart thermostats, to further mitigate risks.
- 6.10 Furthermore, all registered providers now ensure frontline staff (including maintenance, asset management and customer services teams) receive appropriate up to date training to identify and address D&M issues at an early stage.
- 6.11 In response to Awaab's Law, some RPs have referenced the need to update their budget provisions; recruit more specialists and surveyors and increase the frequency of preventative inspections and visits. The full impact of the new legal provisions are still being considered by the sector as a whole and further measures will inevitably come forward in time.

Supporting residents

- 6.12 In supporting their residents, Registered Providers take a variety of approaches to inform and support tenants in preventing damp and mould issues. This includes providing guidance, engagement, and tailored support depending on residents' needs and properties.
- 6.13 Written guidance is provided by way of leaflets, regular newsletters, online resources via their website and tenancy sign-up packs to explaining the causes of damp and mould, how to prevent it and what steps residents can take to mitigate against it.
- 6.14 Some RPs conduct targeted engagement programmes to ensure all issues are reported and the information provided is clear. In some cases, residents' feedback and contributions inform the improvement of processes adopted. For example, NHG is forming a resident led focus group to design new guidance and processes for dealing with damp and mould, and Sanctuary has worked with resident groups to gather feedback on the clarity and tone of their information. A

few providers highlight in their policies the provision of additional or tailored support for their most vulnerable residents.

- 6.15 During inspection visits, either due to regular maintenance or when responding to a D&M report, all RPs provide residents with support and information on how to deal with D&M and the responsibility of the landlord to support residents who are affected by D&M. All RPs mention training of their resident facing staff, to ensure that advice and support is provided in a way that is accessible and supportive.
- 6.16 In complex cases, such as residents facing fuel poverty or financial difficulties, RPs refer residents to relevant third-party organisations that can provide support, or to internal specialised teams (e.g. tenancy sustainment services).

Conclusion from RPs responses

- 6.17 The above summary of responses and information collected from RPs shows, while reactive and proactive approaches might vary depending partly on the stock and size of each organisation, all policies are underlined by a collective acknowledgment of the providers' responsibility for their homes' maintenance and their residents' health and wellbeing. RPs are on this journey collectively when it comes to specific aspects of their approach. However, they are all at different stages of the same journey towards improving their responses in line with Awaab's law.
- 6.18 The Housing Compact will enable working in partnership to address issues such as damp and mould and inadequate insulation, to collate data on the condition of housing stock, and to provide an understanding of what investment is required. However, knowing the condition of homes alone is not sufficient; it must be coupled with a strong understanding of each resident's specific vulnerabilities and communication needs. Through the Compact, providers have made a commitment to share best practices and drive consistency in their approaches and response to residents, so that improvement and measures noted in this report can be adopted by all RPs in Westminster and adapted as per residents' specific needs.

7 Private Rented Sector Enforcement activity

- 7.1 Where complaints are received concerning housing standards from tenants of Registered Providers, Environmental Health Officers within Public Protection and Licensing will seek to work with the provider to seek resolution. We will look to support tenants on using the Registered Providers own complaint structure but when appropriate will intervene and conduct formal inspections allowing for the City Council to direct resolution.
- 7.2 In many cases resolution can be achieved informally by providing advice to both tenant and Provider but where this is not successful, we have statutory powers under the Housing Act 2004 to serve an Improvement Notice, giving a detailed schedule of works required and timeframe in which to make improvements. In

the very worst of cases the Act enables the City Council to conduct works ourselves or prohibit the use of the property until such a time that the issue has been resolved.

- 7.3 Additional powers are provided under The Environmental Protection Act 1990, which allows officers to declare a Statutory Nuisance, allowing for the service of an Abatement Notice, without the 28-day appeal period that the Housing Act 2004 requires, this can be used in some circumstances to provide a speedier response to resident's complaints around Damp and Mould.
- 7.4 Public Protection and Licensing adopted a new policy approach to Registered Providers in April 2024, and therefore before this time we do not have reportable information on the level of complaints from tenants about housing standards.
- 7.5 Since our recording of complaints in 2024, there have been 396 complaints about housing standards within Registered Provider stock, and 10 of these related to damp and mould. Informal resolution was possible in 7 of these 10 cases with 3 Improvement Notices being served.
- 7.6 Environmental Health Officers also respond to concerns of damp and mould from tenants in the Private Sector, aside from Registered Providers, where the same suit of regulatory tools is available. Officers will respond to tenants' complaints, complete property inspections and work with private landlords to seek resolution. Where informal resolution does not bring about improvement for damp and mould, enforcement action is taken through the Housing Act 2004 and the Environmental Protection Act 1990.
- 7.7 The City Council also operates both a mandatory and additional HMO Licensing Scheme. A House in Multiple Occupation (HMO) or Flat in Multiple Occupation (FMO) is a property which is occupied by a least 3 people who are not from one household.
- 7.8 HMOs include buildings where facilities are shared but can also include buildings divided into self-contained flats. Examples can include flat and house shares, bedsits, certain hostels and staff accommodation.
- 7.9 Our HMO licensing scheme seeks to proactively regulate housing standards in licensable HMOs through licensing conditions, another tool we can use to address conditions resulting in damp and mould.

8 Conclusion

- 8.1 Damp and mould in the social housing sector present serious health risks to residents, with prolonged exposure leading to various respiratory issues such as asthma, allergies, and other conditions. These health concerns are especially alarming for vulnerable groups. Therefore, it is essential that repair diagnostics, the repair process, and management are effectively implemented to address these issues.
- 8.2 The [Regulator of Social Housing](#) (RSH) plays a key role in ensuring registered providers of social housing adhere to the relevant consumer standards, including the [Home Standard](#). [The Decent Homes Standard](#) (DHS) is a non-statutory

standard which was introduced by the 1997 Labour Government. Registered providers of social housing are required to meet the [Home Standard](#). This is one of four consumer standards set by the [Regulator of Social Housing](#) (RSH). The Home Standard refers to the DHS.

- 8.3 Through the Housing Compact we are seeking to achieve real outcomes for residents, with a focus on improving the quality and consistency of housing across the city and its social landlords, including a focus on damp and mould.

9 Financial Implications

- 9.1 There are no financial implications arising from this update.

10 Legal Implications

- 10.1 As this is an update on the previously implemented Housing Compact there are no legal implications for the Council.

11 Carbon Impact

- 11.1 The work of the Housing Compact is administered by a range of registered providers and therefore a single carbon impact assessment is not possible.

12 Equalities Impact

- 12.1 The work of the Housing Compact seeks to improve the standards of living for the 28,000+ people living in social housing in Westminster, tenants of both WCC and registered providers. We know these residents are likely to be suffering from higher levels of deprivation and the work of the Housing Compact explicitly seeks to generate fairer outcomes for our residents.

13 Consultation and Engagement

- 13.1 Following the launch of the Housing Compact in November Cllr Begum attended the Resident Forum to provide an update and commit to ongoing updates about the Compact as the partnership progresses.

If you have any queries about this Report or wish to inspect any of the Background Papers, please contact Heather Clarke
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There are no appendices to this report