

# A pathway to improvement

Lessons learnt from damp and mould reviews in social housing

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## Contents

Background	3
Internal audit reviews	4
Overview of actions	5
Management oversight	6
Operating activities	8
Tenant engagement	10
Summary	11



## Background

Managing damp, mould, and condensation effectively is a key responsibility for social housing providers. While the challenges are known, and frameworks to manage damp and mould in properties have evolved, it continues to require significant attention to manage the associated risks.

Following the tragic death of Awaab Ishak and passage of the <u>Social Housing (Regulation) Act 2023</u> (which includes 'Awaab's Law'), the Regulator of Social Housing has an enhanced consumer regulation role. <u>The Safety and Quality Standard</u> "requires landlords to provide safe and good-quality homes for their tenants, along with good-quality landlord services". In line with the regulation, providers are required to:

- Understand the condition of their homes.
- Ensure that properties meet the <u>Decent Homes</u> guidance.
- Take reasonable steps to ensure the health and safety of tenants.
- Ensure repairs, maintenance and improvements to homes are timely, effective and efficient.

In December 2024, The Housing Ombudsman Service released a report on the learnings from <a href="severe">severe</a> maladministration. The Ombudsman urged social housing providers to overcome "complacency" in how they deal with hazards, with the report aiming to assist providers in identifying common issues and preventing recurrent failures. With "Awaab's Law" being implemented from <a href="October 2025">October 2025</a>, social housing providers are legally required to investigate and fix cases of damp and mould within a specified timeframe and repair all emergency hazards within 24 hours.

Against this backdrop, this paper shares the outcomes and key themes arising from our internal audit reviews of damp and mould management across our social housing clients.



## Internal audit reviews

Over the past three years, we have undertaken extensive advisory and assurance internal audit reviews across our social housing clients to evaluate current practices in damp, mould, and condensation management. We have completed 33 reviews in this area, with 52% being advisory and 48% assurance reviews.

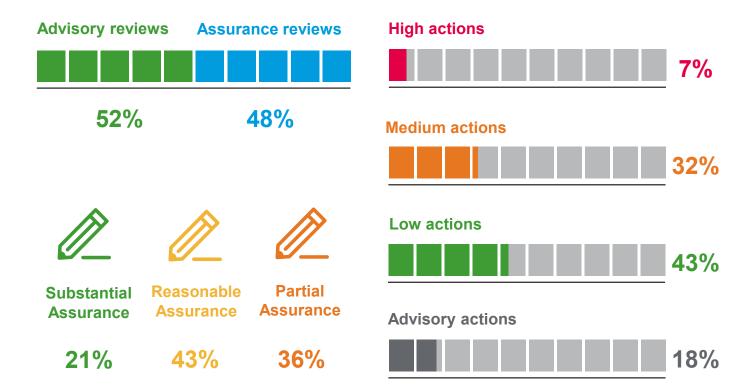
Our advisory reviews, all conducted through 2022/23 and 2023/24, provided tailored advice and insights on key areas where management were seeking to improve processes. In our assurance reviews, we have provided an evaluation of the effectiveness of the design and operation of controls within the specified area, resulting in a formal opinion.

Each review was based on an agreed scope. As such, the findings and issues identified may not be representative or comparable to the number or significance of issues faced in each of these areas within the operating environment of any given social housing provider.

Among the assurance reviews, 21% of providers- received substantial assurance, 43% received reasonable assurance, and 36% received partial assurance.

In categorising internal audit findings, we agree high, medium and low priority management actions with clients. In total, we agreed upon 195 management actions: 7% were prioritised as high, 32% as medium, 43% as low, and 18% were advisory.

With only 21% of reviews receiving substantial assurance and an average of six management actions agreed upon per assignment, it's clear that there is room for improvement in damp, mould, and condensation processes and procedures.





## Overview of actions

Each management action was categorised by key theme and subsequently grouped into three core areas for clear identification of the issues arising.

## 45% Management oversight

26% Policies and procedures

13% Data and performance measures

**6**% Governance

## 39% Operating activities

12% Inspections

10% Monitoring and review

10% Repairs

7% Third parties

## Key questions for audit committees

- What measures are in place to ensure we are informed about sector developments, insights, and lessons learned, and how do we integrate the latest best practices into our operations?
- Are improvements needed to enhance the clarity of our tenant engagement and to improve coordination with repairs and complaints?
- What assurances do you have that current resources, such as data capability, are being used effectively to ensure a proactive approach to the management of damp and mould?

## 16% Tenant engagement

13% Communications

3% Customer vulnerabilities

In the following sections, we explore these areas in more detail, providing insights into the management actions agreed upon. We also identify good practices from across our client base and pose key questions to help you evaluate your organisation's current practices.

By presenting these insights, we aim to support social housing providers in enhancing their damp, mould, and condensation management strategies, strengthening their approach and ultimately, improving living conditions for tenants.





## Management oversight

Effective management oversight is crucial for addressing damp, mould, and condensation. It facilitates the development and implementation of policies, fosters ongoing improvement and underpins compliance with legal and regulatory standards. In this section, we focus on the management actions relating to management oversight, which represent 45% of the management actions we have agreed upon in our reviews.

### 26% policies and procedures

- Developing and implementing detailed policies and procedures for damp, mould and condensation management, ensuring version control, approval and reference to regulatory standards and laws.
- Specific operational guidance and procedures defining roles and responsibilities, prioritising tasks and addressing tenant vulnerabilities. These guidelines should be regularly reviewed to maintain their effectiveness.
- Roles and responsibilities of key individuals involved in the management of damp, mould and condensation should be clearly defined in all policy and procedural documents. Staff training requirements should also be referenced.

### 13% data and performance measures

- Ensuring and maintaining the accuracy of reported data, including inspections dates, work orders raised, post-inspections, and remedial work completion dates. This includes securing data fields in files after completion and conducting routine spot checks to verify data accuracy.
- Define and formalise key performance measures for damp, mould and condensation remediation works.
  Regularly report performance against these metrics with trend analysis of year-to-date cases to facilitate oversight throughout the governance structure.
- Use stock condition survey data and housing management system information to proactively identify and address properties at risk of damp, mould and condensation. Update the Assets Report with key damp, mould and condensation data and consider including year-to-date updates in investment reports.

## **Examples of good practice**

- Using policy acceptance software to confirm understanding and recording acceptance of damp, mould and condensation policies.
- Assessing damp, mould and condensation cases through diagnostic tools during calls to the tenant contact centre. This includes streaming live footage from tenants' smartphones to the tenant contact centre for immediate identification and categorisation of the problem raised.
- Identifying all potential data sources available within the organisation for monitoring damp, mould and condensation issues including tenant vulnerabilities. Utilising data analytics to triangulate this information, tracking risk trends across all properties, and producing geographic 'heatmaps' to pinpoint areas with a higher prevalence of damp, mould and condensation.
- Cross departmental meetings to promote collaborative approaches towards damp, mould and condensation issues, and to coordinate strategies.
- Complaint trends, drivers and learnings are discussed at relevant committees and escalated to the board throughout the year.
- Specialist damp, mould and condensation contractors provide advice on the development of damp, mould and condensation management and remediation processes, feeding into a provider's approach.

### 6% governance

- Implement a clear reporting framework within the governance structure, ensuring compliance with key legislation such as the Homes (Fitness for Human Habitation) Act 2018. This framework should include regular reporting against key performance indicators (KPIs) and there should be board oversight, particularly for more complex cases.
- Subcommittees should have clear terms of reference for overseeing damp, mould, and condensation cases and regularly receive up-to-date, timely, comparative performance data which they report to the board to ensure transparency and accountability.
- Formalise the surveyor categorisation and prioritisation of damp, mould, and condensation cases, in line with Housing Health and Safety Rating System (HHSRS) guidance.

### **Key questions for audit committees**

- Do we have comprehensive and regularly reviewed policies and procedures in place for managing damp, mould and condensation; with clearly defined roles and responsibilities, that prioritise tasks and tenant vulnerability?
- How are we ensuring the policies and procedures are being embedded into practice?
- Are we effectively using data to manage damp, mould, and condensation, with clearly defined performance measures and proactive identification of at-risk properties?
- How are we ensuring that our reporting framework and governance structure maintain effective oversight of damp, mould and condensation cases?





## Operating activities

Operating activities, which make up 39% of management actions, highlight the importance of setting clear timescales for inspections and repairs to address issues. Effective monitoring and review processes are integral for ensuring compliance and tracking progress.

## 12% Inspections

- Set timescales are defined for all inspections of damp, mould and condensation issues, based on priority or nature of the work.
- Inspection results, together with supporting evidence, are documented and promptly uploaded to the repair system. Any delays are investigated. Open job reports are compared with inspection reports to verify that work orders are not duplicated and that all tasks are accounted for.
- Pre-inspection forms capture any damp, mould and condensation issues identified at the property, together with the resident risk profile.
- Post-inspections are carried out before closing any Housing Health and Safety Rating System (HHSRS) hazard case categorised as damp, mould and condensation.

### 10% Monitoring and review

- The provider's overall damp, mould, and condensation action plan includes key fields to ensure a complete audit trail and track progress, such as implementation dates, priority, responsible owner, and current status. Updates on the progress made against the action plan are reported through the governance structure to ensure transparency and accountability.
- Inspection and remedial work timescales are tracked through performance metrics. Comprehensive action plans are implemented to address remedial work backlogs, with actions prioritised based on risk assessment.
- Reviewing properties and tenants where the most no access visits have occurred to determine if there are any trends with regards to customer profiles, vulnerabilities or protected characteristics.
- Regular review of open cases to ensure jobs have been assigned and any discrepancies (such as issues with no access) have been transferred to the correct team.
- Regular review of the damp, mould, and condensation repairs report, including open cases, to ensure that repairs are appropriately prioritised based on tenant vulnerabilities and completed within set timescales.

## **Examples of good practice**

- Before the completion of any work, staff must answer mandatory standard questions on a handheld personal digital assistance (PDA) device during property visits. Examples include: "Have you identified any damp, mould, and condensation while on-site at the property?" and "Have you observed any safeguarding issues while on-site at the property?"
- Consider nearby property repairs when tenants report issues to determine if the repair caused the problem or if a recurring issue requires a broader solution.
- Regular assessment of remedial work to ensure the work completed meets the required standards, confirming the effectiveness of the repairs and preventing future issues.
- Evaluate the categorisation of repairs to ensure incidents of damp and mould are accurately classified and response times are adhered to.
- In cases where there has been no communication from a tenant for two years or more, a visit is arranged to address any potential issues related to damp, mould, and condensation.
- Conduct a monthly review of damp, mould, and condensation patterns, including historical cases, and assess the associated risks for residents and properties.
- If a repair appointment is missed, the job remains open until contact is made and a new appointment is scheduled. The tenant profile is reviewed, especially if visits are repeatedly refused, to understand the cause.
- Provide training to external contractors to ensure they can identify, and report issues related to damp, mould and condensation.
  When the training is delivered by the external contractor, evidence of staff completion is required.



### 10% Repairs

- Repairs are completed within specified timescales based on priority, and any delays are documented.
- When staff or contractors identify damp, mould, and condensation,; a case will be opened and follow-up visits scheduled.
- The estimated and actual costs of disrepair claims are monitored, and any variances exceeding an agreed threshold are investigated.
- Post-repair aftercare calls are conducted to verify that issues have been resolved and to establish a follow-up process with specified timelines.
- Tenants who decline repair work for damp, mould, and condensation will be informed of the potential risks to ensure they understand the impact these issues have on the household.

## 7% Third-party management

- Policies and expectations are clearly communicated to all contractors, including those handling emergency and out-of-hours repairs.
- Regular meetings are held to discuss open jobs and performance, with detailed reports and notes documenting discussions.
- KPIs are recorded and regularly monitored, with quarterly meetings held to address any noncompliance issues. Meeting minutes and reports are centrally stored to ensure continuity.
- Post-inspection findings are recorded and discussed with contractors to prioritise quality assurance and issue resolution. Disrepair works are given specific timescales, and compliance is monitored.

## Key questions for audit committees

- How are we ensuring effective management and documentation of inspections for damp, mould, and condensation, with timely reporting and resolution of high-risk cases?
- What measures are we taking to ensure our damp and mould action plans are comprehensive, effectively tracked, and address case backlogs and tenant vulnerabilities promptly?
- What measures are in place to ensure effective contractor management and that they are meeting our standards?
- What improvements can we make to our processes to manage damp, mould, and condensation cases from identification to resolution, including cost monitoring, adherence to repair timelines, and handling tenant refusals?



## Tenant engagement

Effective communication with tenants and addressing customer vulnerabilities are key areas of focus within tenant engagement. Management actions accounted for 16% in our reviews in this area. Below we provide insights into the common management actions agreed with clients.

#### 13% Communication

- The Damp and Mould Communications Strategy / Plan should incorporate different methods of engagement such as emails, social media, website and leaflets to effectively reach all tenant demographics.
- A structured approach to regular and proactive contact with customers experiencing damp, mould and condensation issues. This includes defining responsibilities and timelines for customer communication, documenting these communications, and considering customers' preferred communication methods.
- Customer-facing documents are provided accurately and are accessible in multiple languages, available digitally, on paper, and in formats such as braille and audio.
- Training programmes and guidance for staff handling damp, mould and condensation issues on how to properly recognise and triangulate damp and mould cases. This involves designing and delivering materials, establishing tiered modules, and ensuring compliance through regular monitoring.

## Key questions for audit committees

- How are we ensuring our communication and training on damp, mould and condensation issues are inclusive, effectively reach all tenants and keep affected customers informed?
- How do we ensure our staff are trained to identify and respond to damp and mould issues, treating residents with respect and empathy?
- How do we identify, document, and prioritise customer vulnerabilities in our repair processes?

#### 3% Customer vulnerabilities

- Procedures to effectively manage customer vulnerabilities should ensure that roles and responsibilities are clearly defined, especially for highpriority cases. Communicate these procedures to ensure that all staff understand their respective parts in the process.
- Consistent and regular reporting on high-priority cases involving vulnerable customers, detailing the measures undertaken to address their needs.
- Integrate the process of identifying vulnerabilities into the repair system with supporting documentation.
  Tenant vulnerability should be a key factor in prioritising remedial work.

## **Examples of good practice**

- A damp, mould and condensation tenant panel which consists of tenants to facilitate direct and timely feedback from customers regarding the management of damp, mould and condensation issues.
- The website offers accessibility options, enabling users to read information in different languages, listen to audio formats, and adjust the font size for improved readability.
- A dedicated damp, mould and condensation webpage, provides advice in written and video format to support customers in preventing damp, mould and condensation.
- All staff involved in repairs and customer service are required to complete mandatory training on damp, mould and condensation.
  The training includes practical examples, how to minimise effects and reporting lines.
- Vulnerability profiles are integrated within customer relationship management systems, where information and consent have been provided by tenants. Priority is given to the safety and wellbeing of tenants with known safeguarding or health concerns.

10



## Summary

Our advisory and assurance internal audit reviews have identified several areas within the management of damp, mould, and condensation that would enhance current working practices. Our findings underscore the importance of having clear policies, procedures, and operational guidance to ensure consistency and that identified issues are addressed effectively. It is vital that all staff members understand the policies and are aware of their roles and responsibilities.

Data reporting and triangulation is another important aspect highlighted in our findings. Records of inspections and remedial work should be maintained and complete, with additional measures to ensure the accuracy of recorded data. By triangulating data sources and using analytics, properties at risk of damp, mould, and condensation can be identified, enabling preventative actions. This approach reduces reliance on customer reporting and transitions to a more proactive, data-led strategy. By implementing this approach and establishing a well-defined reporting structure within the governance framework, organisations can gain a thorough understanding of issues and prioritise work based on risk.

Clear communication with tenants, particularly those with known vulnerabilities, is also a key focus area. A structured approach to regular and proactive contact with tenants experiencing damp, mould, and condensation issues is necessary to ensure their concerns are addressed promptly and effectively. Additionally, ensuring that vulnerability profiles are captured in the repairs system is an important tool to enable providers to prioritise action based on known risk factors.

## Insight4housing

Insight4housing is a comprehensive digital solution designed to help social housing associations effectively manage risk and compliance.

Insight4housing encompasses the full suite of solutions offered by <a href="Insight4GRC">Insight4GRC</a> but is uniquely tailored for housing associations. Its primary objective is to facilitate the tracking, management, and monitoring of various aspects crucial to housing associations using <a href="4action">4action</a>, <a href="4risk">4risk</a>, <a href="4policies">4policies</a> and 4questionnaires.

#### What are the benefits?

The platform utilises customisable and interactive dashboards, providing clear oversight to senior management, the board, and subcommittees on:

- Damp, mould, and condensation assurance activities and outcomes.
- Tenant satisfaction survey analysis, remedial action progress, and responses.
- Improvement and action progress (eg internal audit management actions and risk actions).
- Policy acceptance ratings and document management.

To find out more, visit the RSM website.

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