

**1. Policy statement**

- 1.1. At Rooftop Housing Group (Rooftop) we are committed to ensuring people who live in or visit our homes are safe and that our properties are free from damp, mould and condensation (DMC).
- 1.2. This Policy details Rooftop's approach to how the risk of DMC is managed and how we will respond to reports of DMC within our homes.
- 1.3. The primary purpose of this Policy is to ensure that all Rooftop colleagues and customers are aware, understand and are equipped with information to deliver the requirements of our process in respect of issues relating to DMC.

**2. Statutory and Regulatory context**

- 2.1. This document has been reviewed in line with the Regulator of Social Housing's (RSH) Safety and Quality Standard (April 2024) which states:
  - 2.1.1. **Stock quality** – "Registered providers must have an accurate, up to date and evidenced understanding of the condition of their homes that reliably informs their provision of good quality, well maintained and safe homes for tenants".
  - 2.1.2. **Decency** – "Registered providers must ensure that tenants' homes meet the standard set out in section five of the Government's Decent Homes Guidance and continue to maintain their homes to at least this standard unless exempted by the regulator".
  - 2.1.3. **Health and safety** – "When acting as landlords, registered providers must take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas".
- 2.2. This Policy has been developed to take into account a range of relevant UK legislation and regulation including:
  - Housing Act 1985.
  - Landlord and Tenant Act 1985, Section 11 – Repairs and Maintenance.
  - Decent Homes Standard – June 2023.
  - Housing Act 2004 – Housing Health and Safety Rating System.
  - Homes (Fitness for Human Habitation) Act 2018.
  - Housing Ombudsman Spotlight report October 2021.
  - Social Housing Regulation Bill 2022.

**3. Policy outline**

- 3.1. We have designed this Policy to ensure our customers are able to easily report instances of DMC in their home. This Policy also explains our approach to resolving these issues once they have been received.
- 3.2. This Policy sets out a clear framework for how we respond to reports of DMC which may arise in our homes.

3.3. This Policy forms part of a wider organisational commitment to driving a positive health and safety culture amongst colleagues and contractors.

#### **4. Equality, Diversity and Inclusion: Principles**

4.1. At Rooftop we are committed to creating and sustaining a diverse and inclusive environment achieving positive outcomes for potential and existing customers, our colleagues and the wider community. Our commitments to our customers, colleagues and communities are detailed in our Equality, Diversity and Inclusion (EDI) Strategy. We are an organisation that values diversity, champions equality and inclusion. We demonstrate this through the activities and the services we provide. This means living by, working to and acting on our Values.

4.2. Rooftop appreciates and embraces the diversity of customers and there will be occasions where our response to reports of DMC will need to be tailored to accommodate individuals and their needs. Every attempt will be made to identify any individual circumstances at first point of contact to ensure reasonable adjustments can be made.

#### **5. Vulnerability: Reasonable Adjustments**

5.1. There are occasionally circumstances where we need to consider working outside of the parameters of this Policy. This may be where there are several complexities present, or where customers have vulnerabilities that may lead us to make reasonable adjustments to the way we apply this Policy. In such cases, a referral should be made to the Complex Cases Review Group via the Head of Housing, where any approach outside of this Policy (and potentially other policies) will be considered and recorded, if agreed. This will always be considered in the context of the Assessing and Supporting Vulnerability Policy.

#### **6. Data Protection: Principles**

6.1. Rooftop recognises the importance of protecting the personal data of our customers, colleagues, contractors and other stakeholders and our commitment to compliance with data protection laws and managing personal data responsibly. As an organisation, we are committed to ensuring everything we do with personal data follows the principles of lawfulness, transparency, fairness and accuracy whilst minimising the amount of data we collect and only using it for specific, explicit and legitimate purposes until we no longer need it.

#### **7. Objectives**

7.1. This Policy is designed to meet the following objectives:

- Ensure that all customers live in a safe and habitable environment.
- Comply with relevant statutory and regulatory obligations.
- Provide clarity on our overall approach to DMC.
- Ensure that we are delivering a consistent service to our customers.
- Treat customers reporting DMC with respect and empathy and provide support where required.
- Respond effectively to individual reports of DMC focusing on identifying the cause to implement the right solution.
- Ensure colleagues are appropriately trained.
- Set out our proactive approach to deal with wider issues around DMC.
- Provide assurance to our stakeholders that our approach to DMC is appropriate and effective.
- Raise awareness with our people and our customers through targeted campaigns.

- Interact with and listen to the feedback of customers to shape service delivery and customer experience.
- Communicate with our customers who are involved in this process to ensure they are fully aware of the steps throughout and quickly respond if things go wrong.

## **8. Damp, Mould and Condensation definitions**

8.1. DMC is caused by excess moisture. It is important to find out why a property is affected by DMC to ensure that appropriate repairs are carried out and/or steps are taken to limit moisture in the air. The main types of damp are:

### **8.2. Rising damp**

8.2.1. Water can be 'sucked up' from the ground onto walls of buildings. Usually this is not a problem as a damp proof course (DPC) acts as a barrier to prevent water entering habitable areas of the home. However, if the DPC fails or is 'bridged' then water can rise up the wall, usually to a height of about one metre. The damp walls may be cold or moist to touch and they may also appear different in colour to that of the drier walls elsewhere in the home.

### **8.3. Penetrating damp**

8.3.1. Water which can enter the home through cracks or holes in external walls or because the brick or blockwork becomes saturated often from a source of water, such as a leaking gutter or a detail that lets water pond or stagnate preventing it from running away from the building.

### **8.4. Leaks**

8.4.1. Leaks from guttering, downpipes, roof flashing or failed roof coverings can all lead to damp and damage from water entering the home. Leaks can also occur internally from pipework such as radiators, hot and cold water systems or waste pipes from showers, sinks and toilets. These can also be a source of damp and are usually identifiable from tidemarks.

### **8.5. Condensation moisture**

8.5.1. Condensation forms when water vapour meets a cold surface. This can be visible when condensation occurs on cold windows but also can be unseen on cold walls. It is usually caused by a build-up of moisture in a home and can lead to mould growth.

### **8.6. Mould**

8.6.1. Mould is a natural organic compound that develops in damp conditions and will only grow on damp surfaces.

### **8.7. Risk Indicators**

9. The conditions that may increase the risk of damp, mould and condensation are (but not limited to) a lack of ventilation within the property; inadequate heating; inadequate insulation; high humidity; overcrowding; leaks; blocked drains/rainwater goods; flooding; and/or breached/failed damp proof course/membranes.

## **10. Our customer commitment**

10.1. We will:

10.1.1. Actively encourage customers to report DMC.

10.1.2. Actively work to investigate, remediate and prevent DMC in our homes and take action to address the range of causes. This includes updating insulation and

ventilation and our planned approach to improving energy efficiency across our homes including bringing all homes up to EPC Band C by 2030.

- 10.1.3. Provide regular updates to customers once DMC has been reported including timescales for works to be completed.
- 10.1.4. Use stock condition surveys and customer information to develop a data driven risk based approach to DMC.
- 10.1.5. Provide information and advice to customers which will assist them to prevent DMC in their home.
- 10.1.6. Refer customers to our Money Advice Team where they are struggling to afford to heat their homes to assist with benefit/income checks/grants and advise how to make a claim where possible.
- 10.1.7. Provide training sessions across our organisation appropriate to roles to ensure colleagues understand the causes and possible remedies for DMC.
- 10.2. **Our responsibilities**
  - 10.2.1. Insulate homes in accordance with Decent Homes Standard to help reduce the likelihood of DMC occurring.
  - 10.2.2. Provide appropriate response times to repairing defects within the home which may contribute to DMC. These include, but are not exclusive to, heating repairs, repairs to leaks and damage to roofs.
  - 10.2.3. Maintain homes to avoid penetrating and rising damp and for undertaking remedial works if these do occur.
  - 10.2.4. Help customers understand how to minimise DMC in the home.
- 10.3. **Customer responsibilities**
  - 10.3.1. Report any issues regarding DMC as soon as reasonably possible.
  - 10.3.2. Ensure the effective operation of any equipment installed at the property to improve the condition such as extractor fans and trickle vents, and actioning any advice provided to them by Rooftop colleagues (or their representatives).
  - 10.3.3. Where DMC has been identified either by a customer, Rooftop or other agency/company, customers will be required to allow access for inspections and for the carrying out of remedial works in accordance with their tenancy agreement. Rooftop do consider DMC to be a health and safety concern for customers and will utilise their No Access Policy and Procedure where necessary.
  - 10.3.4. Rooftop will provide customers with advice on how to minimise DMC within their home on its website, social media and other formats. The website has a dedicated DMC page to enable customers to search for information, support and advice on how to minimise the risk of DMC and how to report DMC.
  - 10.3.5. For leaseholders and shared owners, the responsibility will be determined by the nature of the lease agreement relating to their home. Generally, the customer is responsible for the internal condition of their home and we are responsible for its external condition and structure.

## **11. How we will help**

- 11.1. DMC can be reported via telephone, email, online, writing to our offices or directly to a Rooftop colleague.
- 11.2. If reported via telephone, we will ask structured questions to accurately diagnose any issues and gather as much information as necessary regarding property

condition, customer profile and individual circumstances including vulnerabilities or medical needs. We may request that the customer provides photographs via email.

- 11.3. If reported online, customers can complete a short form that will ask for details of the household including any vulnerabilities, nature of the DMC, location and photographs.
- 11.4. A repair may be raised immediately where the issue can be resolved quickly such as replacing sealant around the bath.
- 11.5. If following the initial structured questions, further investigations are required, then we will arrange a suitable time for an inspection of the home to identify and plan out the remedial works that are required.
- 11.6. An inspection may be remote utilising modern technology (for example photos and videos) however, should a customer request a physical investigation, we will ensure that the necessary arrangements are made.
- 11.7. The inspection may be carried out by a Rooftop Building Inspector and/or a third party engaged by Rooftop. In some cases, the Building Inspector may also highlight positive actions the customer could take to prevent the DMC from worsening or reoccurring.
- 11.8. We will aim to complete our investigation within 14 calendar days or sooner if need identified owing to customers health and vulnerability issues or if a Category 1 hazard is reported/suspected.
- 11.9. Following a review of the information gathered through the investigation stage, there are a number of remedial actions that can be taken to alleviate the issues:
  - Damp and mould treatment – to take place as soon as possible to reduce the health and safety risk. We will aim for this to be carried out within seven calendar days of concluding our investigation, subject to access and customer availability.
  - Minor repairs to be raised such as repairing/replacing extractor fans.
  - Major works to be raised such as damp-proof courses or insulation.
- 11.10. Minor repairs will be completed as soon as possible by our external contractors. Major repairs will be scheduled with an external contractor or will be addressed through a planned programme.
- 11.11. A property may require a combination of treatment, minor and major repairs with several visits by a variety of specialist contractors.
- 11.12. Every customer and every case is treated on an individual basis. Remediation and follow-on work can be prioritised where there is significant DMC and / or there are concerns about a customer's health and/or vulnerability. Additional actions or support may need to be provided to customers whilst repairs are being completed such as decanting or liaising with other professionals etc.
- 11.13. DMC works that exceed £1,000 and 100% of Category 1 Hazards will be post inspected by a Rooftop Building Inspector subject to access and customer availability. A post inspection may be carried out remotely through video or photographic evidence and Building Inspectors will use their discretion to determine whether this is appropriate on a case by case basis. Suitable evidence of the post inspection will be recorded and retained on file.
- 11.14. We will survey customers three months and six months post resolution to ensure that the DMC has not returned.

11.15. If the DMC reoccurs then we will re-open the case, reinvestigate and raise further works. If required, we will commission an independent specialist surveyor to provide a second opinion.

11.16. We may also seek out the customer's permission to carry out monitoring using specialised equipment to help us understand how the home is being used to determine what other actions need to be taken to solve the issue.

## **12. Vulnerability and Reasonable Adjustment**

12.1 Every customer and every case is treated on an individual basis. Rooftop will request customers provided details of vulnerabilities within the household at the time they report damp and mould issues. These customers will be prioritised for surveys and remedial works wherever possible.

12.2 We define vulnerabilities relating to damp and mould issues as outlined in the Government publication 'Understanding and addressing the health risks of damp and mould in the home' Under the section 'People most at risk of health issues from damp and mould'. These health risks are as follows:

12.2.1 People with pre-existing health conditions (for examples allergies, asthma, COPD, cystic fibrosis, other lung diseases and cardiovascular disease) who are at risk of their condition worsening and have a higher risk of developing fungal infections and/or additional allergies.

12.2.2 People of all ages who have a weakened immune system, such as people who have cancer or are undergoing chemotherapy, people who have had a transplant, or other people who are taking medications that suppress their immune system.

12.2.3 People living with a mental health condition.

12.2.4 Pregnant women, their unborn babies and women who have recently given birth, who may have weakened immune systems.

12.2.5 Children and young people whose organs are still developing and are therefore more likely to suffer from physical conditions such as respiratory problems.

12.2.6 Children and young people who are at risk of worsening mental health.

12.2.7 Older people.

12.2.8 People who are bedbound, housebound or have mobility problems making it more difficult for them to get out of a home with damp and mould and into fresh air.

12.3 Rooftop appreciates and embraces the diversity of customers and there will be occasions where services will need to be tailored to accommodate individuals and their needs. Every attempt will be made to identify any individual circumstances at first point of contact to ensure reasonable adjustments can be made.

## **13 Decants**

13.1 Depending on the diagnosis, complexity and scale of the works required if it is considered unsafe or unsuitable for customers to remain in the property while the works are carried out, alternative accommodation arrangements will be made. This may be on a day-by-day basis or a temporary decant to an alternative property. The customer will be supported through this process to find suitable accommodation.

13.2 In some cases, it may be necessary to re-house customers on a permanent basis if a medical professional, Building Inspector or Specialist Surveyor advises that re-housing is the most suitable option.

13.3 Decants will be handled in line with the Allocations and Lettings Policy and all customers will be supported by their Neighbourhood Housing Officer.

## **14 Areas of responsibility**

- 14.1 Rooftop's approach to DMC is a collective organisational responsibility.
- 14.2 The Asset Investment team is responsible for undertaking stock condition surveys of properties to understand the condition and their investment needs. As part of this rolling programme of surveys, they will identify any hazards in relation to DMC under the Housing Health and Safety Rating System (HHSRS).
- 14.3 Data from the surveys will be used to address any issues but also to proactively assess our homes, identify hot spots and specific areas of intervention to prevent any issues with DMC.
- 14.4 The Repairs and Maintenance team will handle reports of DMC, open DMC cases, raise remedial works and arrange for property inspections by either a Rooftop Building Inspector or a third party who will identify and raise the works required and make a judgement on whether the DMC is a HHSRS Hazard and if a decant is required.
- 14.5 While our properties are empty, and in line with our 'lettable standard', the Voids Team (PPC or Rooftop) will identify any DMC issues, carry out any necessary investigations and undertake remedial works before reletting a property.
- 14.6 Lettings Officers will consider whether a property is suitable for the ingoing customer based on household size, any vulnerabilities and property design and typology seeking advice from colleagues as necessary.
- 14.7 Neighbourhood Housing Officers that identify DMC in Rooftop properties when visiting customers will raise a contact on our internal housing management system to be dealt with in accordance with this Policy.
- 14.8 Frontline services are responsible for undertaking training in relation to DMC awareness and reporting any issues at the earliest opportunity via the internal housing management system.
- 14.9 All Rooftop colleagues will update DMC cases with relevant information and work together to resolve the issue as soon as possible and keep customers updated.

## **15 Training**

- 15.1 We will make all relevant colleagues aware of this Policy and the procedures which support it including those responsible for managing the delivery of repair work.
- 15.2 We will provide regular training sessions across the business to ensure colleagues understand the causes and possible remedies of DMC.
- 15.3 We will provide specialist training where necessary to those that are responsible for diagnosing the cause of DMC and determining remedial actions.

## **16 Performance Reporting and Risk Register**

- 16.1 Rooftop will raise a DMC case on its housing management system for all reports of DMC in its homes. This will enable progress to be monitored and all relevant communication to be recorded appropriately.
- 16.2 We will report key performance indicator (KPI) measures for DMC. These will be documented in the monthly Health, Safety and Compliance Report which is presented at each meeting of the Executive Team, the Audit and Risk Committee and the Board.
- 16.3 As a minimum we will report:
  - Homes reporting a problem with DMC.
  - Homes where action is in progress.

- Homes where the case has been successfully closed following the completion of remedial actions.

16.4 In addition, Rooftop has DMC on its Strategic Risk Register and continues to review its controls, process and personnel on an ongoing basis in line with sector good practice, learning from complaints and customer feedback to improve service delivery and reduce risk to customers.

## **17 Proactive management**

17.1 All properties with recorded instances of DMC will be logged alongside any diagnostic information collected. This information will be analysed quarterly to identify trends and drive a proactive approach to prevention and remediation.

17.2 Wherever we have identified 10% or more homes in a location with instances of DMC, we will carry out proactive surveys and use this data to target our resources.

17.3 Should a property defect be identified through surveys that either is currently occurring or is likely to occur within other homes, works will be identified and carried out as a planned programme. This ensures a proactive approach to tackling defects that may result in DMC in the future.

17.4 We will trial the use of Internet of Things (IOT) in preventing DMC. This includes dashboard alerts for high humidity and low temperatures.

17.5 We will develop a programme for installing dehumidifying ventilation systems within our homes.

17.6 Fit replacement components that support the prevention of DMC issues – such as windows with trickle vents or additional insulation.

17.7 Replace ineffective and inefficient heating with energy efficient heating systems.

17.8 Identify homes where improvements cannot be made and consider options for disposal.

## **18 Complaints, claims and lessons learned**

18.1 We aim to resolve complaints as quickly as possible without customers needing to resort to disrepair claims and legal action. Where a customer makes a complaint relating to DMC, we will highlight this with the DMC team at the earliest opportunity so that we can assess the current situation and put any actions in place while then carrying out the wider investigation.

18.2 Compensation will be payable in line with Rooftop's Compensation Policy if deemed necessary as part of a complaint resolution.

18.3 Where legal action is taken, we will follow the Pre-Action Protocol for Housing Conditions Claims so that we may resolve the dispute outside of court to help ensure issues are resolved quicker for customers.

18.4 We will learn lessons from DMC cases, and continually review our procedures and processes and how we communicate with customers, in order to improve future responses.

## **19 Review**

19.1 This Policy will be reviewed in 12 months and then every three years unless there are major changes in legislation or good practice.

## **20 Consultation**

20.1 Leadership Team Sub-Group N/A

20.2	Executive Team	October 2024
20.3	Other (eg customers)	N/A
<b>21</b>	<b>Responsibilities</b>	
	<b>Responsible body</b>	
21.1	Formulation, amendment, and approval of Policy	Executive Team
	Monitoring of Policy	Leadership Team
	Operational management of Policy/Policy author	Head of Asset Investment
21.2	<b>Date of formulation of Policy</b>	August 2022
21.3	<b>Dates of Policy reviews</b>	April 2024
		October 2024
21.4	<b>Date of next review</b>	October 2025

## Associated documents

### Internal – Rooftop policies and procedures

- Customer Complaints Policy
- Disrepair Policy
- Health and Safety Policy
- Repairs and Maintenance Policy
- Assessing and Supporting Vulnerability Policy
- Tenancy Agreement
- Void Works Management Policy
- Allocations and Lettings Policy

### External

- Regulator of Social Housing Safety and Quality Standard (April 2024)
- Housing Ombudsman’s Spotlight on Damp and Mould (October 2021)
- Awaab’s Law Consultation
- Relevant UK legislation as detailed in Section 2