

Action point number	Detail	Proposed Action(s)	Not Started/ In Progress/ Complete	Target Completion Date
1	Landlords should adopt a zero-tolerance approach to damp and mould interventions. Landlords should review their current strategy and consider whether their approach will achieve this	<p>Damp and Mould Policy updated in December 2024 – originally approved by Board in 2023.</p> <p>Approach to damp and mould includes:</p> <ul style="list-style-type: none"> • Cleaning in every case • Triage • Maljon surveys • Structural vs non-structural considered • Winter action plan in place • Dedicated resources allocated • Website upgraded and customer comms redrafted. <p>Damp and Mould performance data regularly supplied and reviewed by operational teams and reported to Customer Insight Committee and Board.</p>	Complete	
2	Landlords should consider whether they require an overall framework, or policy, to address damp and mould which would cover each area where the landlord may be required to act. This would include any proactive interventions, its approach to diagnosis, actions it considers appropriate in different circumstances, effective communication and aftercare.	Damp and Mould Policy updated December 2024 originally approved by Board in 2023.	Complete	
3	Landlords should review the accessibility and use of their systems for reporting repairs and making complaints to 'find their silence.'	Housing Ombudsman Complaint Handling Code adopted and self-assessment undertaken and refreshed in 2024. We have a Complaints Handling Assessment Team (CHAT) where customers review our complaints and feedback being considered	Complete	

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		and implemented. Repairs can be reported through multiple channels available for reporting repairs including non-digital options. Tenancy sustainment service in place. Customers in supported settings with vulnerabilities able to report via staff members. 24/7 repairs reporting available. Finding silence exercise is routinely carried out to identify properties that have had no access or repairs reported and to follow up on this.		
4	Landlords should identify opportunities for extending the scope of their diagnosis within buildings, for example by examining neighbouring properties, to ensure the response early on is as effective as possible.	A review has been carried out of all orders raised against category 1 and 2 D&M hazards to identify any structural concerns that may be repeated in neighbouring properties with similar archetypes. Our asset data, including Stock Condition Survey (SCS) data, is now used to interrogate any potential reoccurrence of structural defects that may need investigating and remedial works carried out either on a reactive or planned basis, or tied into our net zero strategy. Triangulation of data relating to vulnerabilities, access and compliance is used to identify homes and customers who may be at greater risk.	Complete	

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5	Landlords should implement a data driven, risk-based approach with respect to damp and mould. This will reduce over reliance on residents to report issues, help landlords identify hidden issues and support landlords to anticipate and prioritise interventions before a complaint or disrepair claim is made.	<p>Dashboard introduced in November 2022 identifying orders raised against category 1 and 2 D&M hazards.</p> <p>Asset Management Review data tool implemented December 2022 enabling cross-referencing of data sets to inform business decisions.</p> <p>Enhanced data tool to cross-reference customer data with stock data to identify high and medium risk properties implemented July 2023.</p> <p>Triangulation of data relating to vulnerabilities, access and compliance is used to identify homes and customers who may be at greater risk.</p>	Complete	
6	Where properties are identified for future disposal or are within an area marked for regeneration, landlords should proactively satisfy themselves that residents do not receive a poorer standard of service or lower living conditions, that steps are taken to avoid homes degrading to an unacceptable condition and that they regularly engage and communicate with these residents.	<p>Disposal Policy in place - reviewed by Board February 2025. Properties only identified for disposal at void stage.</p> <p>Audit into disposals undertaken by KPMG in July 2023. No issues identified. No areas currently earmarked for regeneration.</p>	Complete	
7	Landlords should avoid taking actions that solely place the onus on the resident. They should evaluate what mitigations they can put in place to support residents in cases where structural interventions are not appropriate and satisfy themselves they are taking all reasonable steps.	<p>Customer comms redrafted.</p> <p>Customer engagement undertaken in autumn 2023.</p> <p>Cleaning undertaken in all cases where triage indicates this would be helpful.</p>	Complete	

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		<p>Cost of living toolkit in place and comms undertaken to publicise.</p> <p>Tenancy Sustainment Team in place and referrals can be made by all staff, customers and other agencies.</p> <p>Welfare Reform Officer in post and actively seeking to maximise incomes.</p> <p>Advice available for all customers in rent arrears / facing financial hardship.</p>		
8	Together with residents, landlords should review the information, materials and support provided to residents to ensure that these strike the right tone and are effective in helping residents to avoid damp and mould in their properties.	Think Tank exercise on related comms and our approach relating to damp and mould undertaken in Autumn 2023. Feedback has been analysed and shared with relevant staff to make changes as appropriate.	Complete	
9	Landlords should be more transparent with residents involved in mutual exchanges and make the most of every opportunity to identify and address damp and mould, including visits and void periods.	<p>Mutual Exchange Policy and Procedure implemented in December 2024.</p> <p>Inspection resources have been increased and are being used more flexibly to increase capacity to maximise every visit to a customer's home to inspect for health and safety issues. Void inspections and SCS are being used to inspect for DHS.</p> <p>DHS inspection sheet finalised and circulated to all members of housing management, estates and repairs teams who go out on site regularly so that at each visit to a customer's</p>	Complete	

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		home an inspection can be undertaken and logged.		
10	Landlords should ensure their strategy for delivering net zero carbon homes considers and plans for how they can identify and respond to potential unintended consequences around damp and mould.	Signed up to Carbon Charter in 2023 and carbon baseline calculated with bronze accreditation. Action plan reviewed. Our Environmental and Sustainability Policy was updated and approved in 2025 by Board. Consultancy undertaken by Turner and Townsend in 2021/22 sets out a roadmap to EPC C and net zero and considers ventilation requirements in addition to insulation and air tightness.	Complete	
11	Landlords should review, alongside residents, their initial response to reports of damp and mould to ensure they avoid automatically apportioning blame or using language that leaves residents feeling blamed.	Think Tank exercise on related comms and our approach relating to damp and mould undertaken in Autumn 2023.	Complete	
12	Landlords should consider their current approach to record keeping and satisfy themselves it is sufficiently accurate and robust. We would encourage landlords to go further and consider whether their record keeping systems and processes support a risk-based approach to damp and mould.	Damp and Mould dashboard in place which is reviewed on a weekly basis and is interrogated for structural and non-structural causes to identify themes and trends, leading to proactive investigations in other properties where appropriate. Annual review of Damp and Mould cases carried out to feed into subsequent planned work programme. AMR tool and 'finding silence' tool being used to model high and medium risk properties. Further scenarios are modelled to identify further potential areas of silence.	Complete	

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		These tools cross-reference multiple property-related data sets and customer data to give a rounded view.		
13	Landlords should ensure that their responses to reports of damp and mould are timely and reflect the urgency of the issue.	Damp and Mould dashboard in place. All potential category 1 hazards responded to as 6-hour emergencies. Category 2 hazards responded to within 31 days. Follow-up work ordered asap after initial visit and tracked to completion. Timescales being reviewed as part of Awaab's Law.	Complete	
14	Landlords should review the number of missed appointments in relation to damp and mould cases and, depending on the outcome of any review, consider what steps may be required to reduce them.	Piloting a new appointment system to maximise attendance whilst still giving customers choice. New Service Standards reviewed and launched in November 2024. "No appointment and access issues" are relatively low based on current dashboard data and will be further monitored.	Completed	
15	Landlords should ensure that their staff, whether in-house or contractors, have the ability to identify and report early signs of damp and mould.	Some repairs staff have undertaken specialist damp and mould training. Training has added to all front-line staff e-learning to help colleagues identify early signs. Repairs teams and main contractors will continue to have annual training.	Completed	
16	Landlords should take steps to identify and resolve any skills gaps they may have, ensuring their staff and contractors have appropriate expertise to properly diagnose and respond to reports of damp and mould.	Linked to above so that a wider group of staff can adequately identify and diagnose potential damp and mould concerns or cases to ensure issues do not get overlooked when carrying out other repair tasks and general servicing/ maintenance. Currently Maljon are	Completed	

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		instructed to survey, and our team of senior operatives and property surveyors carry out surveys as required.		
17	Landlords should ensure that they clearly and regularly communicate with their residents regarding actions taken or otherwise to resolve reports of damp and mould. Landlords should review and update any associated processes and policies accordingly.	<p>Responsive Repairs Policy updated 2025 wording currently stating:</p> <ul style="list-style-type: none"> • In accordance with our Damp, Mould, and Condensation Policy, we will take responsibility for diagnosing and resolving damp and mould in a timely and effective way where there are issues that require repair. We will treat customers reporting damp, mould and condensation with empathy and respect and will not prejudice the reason for any issue. • Ensure both Orwell's staff and external contractors are trained in and provide a high-level of customer care. Our colleagues / contractors will be polite and sensitive to the needs of customers and will explain the nature of the work they are undertaking to the customer and advise of any unavoidable delays. All trade staff/contractors will wear corporate uniforms, and carry, and show ID. <p>Damp and Mould Policy adopted and published December 2022, then updated in November 2024.</p>	Complete	

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18	Landlords must ensure there is effective internal communication between their teams and departments and ensure that one individual or team has overall responsibility for ensuring complaints or reports are resolved, including follow up or aftercare.	A dedicated Customer Resolutions Team has been created and recruited to, and this team has overall responsibility for ensuring complaints are actioned and resolved. A monthly meeting takes place between the repairs team and the complaints officers to review feedback. Repairs also meet monthly with the Customer Insight and Engagement Team to review feedback and make changes to procedures as required.	Complete	
19	Landlords should ensure that their complaints policy is effective and in line with the Complaint Handling Code, with clear compensation and redress guidance. Remedies should be commensurate to the distress and inconvenience caused to the resident, whilst recognising that each case is individual and should be considered on its own merits.	Policy reviewed and brought in line with Complaint Handling Code. Self-assessment has been reviewed and published annually, most recently in April 2024. A new Compensation Policy has been implemented and is in line with Housing Ombudsman guidance.	Complete	
20	Landlords need to ensure they can identify complex cases at an early stage and have a strategy for keeping residents informed and effective resolution.	Senior operatives, property inspectors and Maljon currently carry out inspections and have the skills to identify any complex cases. Equally, our Repairs Diagnostics Team is skilled in triaging cases and checking customer data when raising orders to ensure any vulnerable customers or complex cases are flagged appropriately with senior staff and tracked to completion.	Complete	
21	Landlords should identify where an independent, mutually agreed and suitably qualified surveyor should be used, share the outcomes of all surveys and inspections with residents to help them understand the findings and	Independent company instructed as a matter of course for full survey wherever damp and mould is indicated at likely category 1 or 2	Complete	

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	be clear on next steps. Landlords should then act on accepted survey recommendations in a timely manner.	hazard level. Surveys instructed in all legal disrepair cases.		
22	Where extensive works may be required, landlords should consider the individual circumstances of the household, including any vulnerabilities, and whether or not it is appropriate to move resident(s) out of their home at an early stage.	This part of our current practice and we have moved households to temporary accommodation where appropriate in line with our Decant Policy issued in 2024. An assessment of a customers vulnerability is undertaken at first point of contact when reporting damp and mould.	Complete	
23	Landlords should promote the benefits of their complaints process and the Ombudsman to their residents as an appropriate and effective route to resolving disputes.	Complaint Policy and associated web pages and comms to residents updated to reflect this.	Complete	
24	Landlords should continue to use the complaints procedure when the pre-action protocol has commenced and until legal proceedings have been issued to maximise the opportunities to resolve disputes outside of court. Landlords should ensure their approach is consistent with our jurisdiction guidance and their legal and complaint teams work together effectively where an issue is being pursued through the complaints process and protocol.	This is our practice and our Complaints Policy sets this out.	Complete	
25	Landlords should consider how best to share learning from complaints and the positive impact of changes made as a result within the organisation and externally. Systems should allow the landlord to analyse their complaints data effectively and identify themes, trends and learning opportunities.	Reflective sessions undertaken with repairs, customer services and housing management staff in response to the Housing Ombudsman's spotlight report on Rochdale Borough Housing, ensuring lessons learned could be identified and acted upon, and to ensure all staff were clear of the standards	Complete	

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		<p>expected regarding treating customers with respect and empathy.</p> <p>Customer insight is reported at each Board meeting alongside stats, and a quarterly report is taken to Customer Insight Committee (CIC) to enable a deep dive.</p> <p>Annual Complaint Handling report taken to Board covering insights and themes as well as stats.</p> <p>Complaints data, including lessons learned, shared at Full Management Team meetings on a quarterly basis.</p> <p>CHAT resident group now in place and has met once - feedback from them on our complaint handling has been shared with relevant teams.</p> <p>CRM introduced in 2023 making reporting easier, especially at 'pre-complaint;' stage.</p>		
26	Landlords should ensure they treat residents reporting damp and mould with respect and empathy. The distress and inconvenience experienced by residents in this area is some of the most profound we have seen, and this needs to be reflected in the tone and approach of the complaint handling.	We are Housing Diversity Network (HDN) accredited. This is covered in our induction process and continuously embedded through 1 to 1s and team meetings through our PACE organisational values. Furthermore, complaints training has been developed and rolled out to all staff handling complaints during 2023. Unconscious bias training delivered in 2022. Further training specifically on empathy, tackling stigma and unconscious bias arranged in 2024. EDI Officer in post and liaising closely with	Complete	

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		<p>Director of Customers & Communities (DoCC) on this area.</p> <p>Reflective sessions undertaken with repairs, customer services and housing management staff in response to the Housing Ombudsman's spotlight report on Rochdale Borough Housing, ensuring lessons learned could be identified and acted upon, and to ensure all staff were clear of the standards expected regarding treating customers with respect and empathy.</p>		