Southway Housing Trust

Assurance Review of Damp and Mould

January 2025

Final

Executive Summary

OVERALL ASSESSMENT

ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE

Failure to deliver an effective and efficient property maintenance service to tenants.

Property assets not effectively managed.

Homes and Environment not maintained to health and safety standards.

KEY STRATEGIC FINDINGS

The Trust has strong tenant engagement practices. Letter communications to tenants are well detailed, educational leaflets are left with tenants that provide detailed information on damp and mould, and the same information can also be found on their website.

The Trust was underperforming against targets for the completion of damp and mould assessment and work in the first quarter but has taken steps to make improvements which have significantly increased performance in the second and third quarters.

Assessments are conducted by Property Care Officers who have adequate training to complete the assessments and any work that they need to carry out themselves. Where third parties are used, the Trust holds copies of job completion forms as evidence.

GOOD PRACTICE IDENTIFIED

All tenant communication and education materials are available in multiple languages, or with adjustments for accessibility, improving the access to useful content for all tenants.

SCOPE

This review considered the arrangements in place to meet the Trust's statutory and regulatory obligations where damp and mould has been identified within a property. This included those controls in place to respond to customer reporting of damp and mould, assessing, identifying and rectifying such issues as well as the wider factors such as monitoring, reporting and financial planning.

ACTION POINTS

Urgent	Important	Routine	Operational
0	**1**	**0**	**2**

Assurance - Key Findings and Management Action Plan (MAP)

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
1	Delivery	A review of the November 2024 dashboard report reveals significant underperformance against key targets. Inspections completed within the 14-day target are at 57.6% year-to-date, well below the 90% target. Additionally, only 48.7% of works were completed on time, compared to the 90% goal. This data has been shared with the Board for scrutiny. While the Trust has limited control over contractor timelines, there is an opportunity to enhance performance for inspections and works within the agreed timeframes.	Inspections be prioritised to meet the 14-day target as specified in the KPIs. A review to be conducted to identify the barriers preventing timely completion of inspections and works and the outcome be included in reporting.	2	*Inspections are already prioritised to meet the 14-day target and performance is on an improving trend. Reports are taken to Executive monthly and there are quarterly reports to the People and Places Committee that includes for barriers and actions to be taken. Next report February 2025.*	*28/02/2025*	*D&M Co-ordinator*

PRIORITY GRADINGS

1	URGENT	Fundamental control issue on which action should be taken immediately.	2	IMPORTANT	Control issue on which action should be taken at the earliest opportunity.	3	ROUTINE	Control issue on which action should be taken.

Operational - Effectiveness Matter (OEM) Action Plan

Ref	Risk Area	Finding	Suggested Action	Management Comments
1	Delivery	Whilst Awaab's Law is not yet in effect, one of its requirements will be for works to commence within 7 days of issues being identified. Currently, this is not included as a Key Performance Indicator (KPI) on the monthly dashboard. Including this KPI would allow the Trust to monitor its performance in this area.	Consideration be given to adding a KPI for works commenced within 7 days of issues being identified during inspections, in preparation for the implementation of Awaab's Law.	*This KPI will replace the works completed in target KPI with a consideration to include completion data as secondary reporting target.*
2	Directed	The Trust's Damp and Mould Policy, Version 1.1, was last approved by the Board in June 2023. The Q1 performance report confirmed that this Policy is reviewed on a three yearly basis and is due for June 2026. It is noted that there is version control in place, however the Policy could benefit from including a version control table within the document or elsewhere to track changes. A control table or tracker assists transparency and accountability by tracking policy updates, including changes made, responsible individuals, and dates. Helping maintain compliance, reduce confusion, and ensures users always reference the most current version.	A version control table be added to the Damp and Mould Policy or a central document be created to incorporate all documents with version control.	*As discussed in the closure meeting Jane Gant confirmed that there is a central version control held in Governance.* *However individual policies can have a page added with the version and date reviewed.*

ADVISORY NOTE

Operational Effectiveness Matters need to be considered as part of management review of procedures.

Findings

Directed Risk:

Failure to properly direct the service to ensure compliance with the requirements of the organisation.

Ref	Expected Key Risk Mitigation		Effectiveness of arrangements	Cross Reference to MAP	Cross Reference to OEM
GF	Governance Framework	There is a documented process instruction which accords with the relevant regulatory guidance, Financial Instructions and Scheme of Delegation.	Partially in place	-	2
RM	Risk Mitigation	The documented process aligns with the mitigating arrangements set out in the corporate risk register.	In place	-	-
C	Compliance	Compliance with statutory, regulatory and policy requirements is demonstrated, with action taken in cases of identified non-compliance.	In place	-	-

Other Findings

- The Trust has three risks related to damp and mould within its risk register. These are: Failure to deliver an effective and efficient property maintenance service to tenants; property assets not effectively managed; and homes and environment not maintained to health and safety standards. Each risk has a responsible owner in place for accountability and the Trust operates mitigating controls as well as further planned actions for each of the three risks to help maintain and improve risk mitigation.
- A number of documents held by the Trust outline the expectations around the handling of damp and mould. The Damp and Mould Policy confirms the roles and responsibilities of the primary stakeholders, the causes of damp and mould and other detail such as preventative action and dealing with damp and mould. The Policy is supported by other procedure documents such as the D&M Process Map and CARA Damp and Mould Process for Visits.
- The Trust has outlined its approach to addressing damp and mould issues, including proactive identification of at-risk properties, leveraging data intelligence to assess risk profiles, and mitigating risks associated with decarbonisation efforts. Measures include inspecting and remedying damp-related issues in void properties before re-letting, providing educational resources to raise awareness, and training staff and contractors to identify and address damp and mould concerns during stock condition surveys or repairs. Additionally, there is a plan to use data and sensitive engagement methods to identify residents requiring additional support or prioritisation.
- The Trust emphasises strong tenant engagement in reporting damp and mould issues and commits to addressing these through its Responsive Repairs Policy, prioritising cases by severity. For condensation-related damp, measures will be taken with tenants to prevent recurrence. Severe or recurring issues will trigger assessments and tailored resolutions to the property. Tenants will be kept informed about inspections, diagnoses, and work schedules. The Trust enforces access rights for repairs and, if necessary, will seek legal remedies to ensure timely access to properties, however discussions during the opening meeting confirmed that the Trust was keen to avoid such measures.

Other Findings

Tenants have a number of ways to raise concerns regarding damp and mould. They are able to telephone the call centre, fill in the online form, and raise it with staff at the Trust who will pass this onto the damp and mould team, this is in addition to staff and contractors reporting anything they see during condition checks and repair works. A review of the Trusts website showed that it contains, within their Damp and Mould Section, a contact link which directs tenants to the routes to raise concerns. Additionally, staff have a script to follow when reports come in relating to damp and mould, this ensures that all cases and concerns are handled in a consistent manner.

The Trust's Damp and Mould procedure outlines the specific timescales for responses and actions. Tenant emails and voicemails must be responded to within five days, with urgent cases (for example health or vulnerability concerns) requiring emergency inspections within 24 hours. Initial inspections are completed within seven days, providing treatment during the first visit if feasible, with follow-ups scheduled within 14 days (7 days for health concerns). For larger issues, a mould wash is conducted during the first visit, and third-party contractors (CARA) have 14 days to inspect the property, report, and arrange further works, completing all remedial work within 28 days. Repairs are referred to the Trust's repairs team if needed, and tenants receive a follow-up letter 90 days after the initial report.

An educational leaflet is provided to tenants by the Trust that gives information around condensation, damp and mould. This explains how these issues can arise, and it also provides images so that tenants can recognise types of damp and mould. It provides information to tenants on how they can combat condensation and damp with specific examples of the action's tenants can take as well as informing tenants on ways they can attempt to clear small patches of mould themselves in cases where informing the Trust might not be necessary. The leaflet can also be provided in different languages, and changes can be made to the accessibility of it, for example larger font, allowing the Trust to ensure all tenants have the ability to understand the information given. The same information is also provided on the Trust website improving visibility of the information for tenants.

The Trust provides written communication with tenants regarding damp and mould works. This includes appointment booking notifications, follow-ups for missed contact or access issues, job cancellation updates, and confirmation letters for tenants who decline the required works. Each letter is concise and clearly outlines the necessary work, explaining its importance for health, safety, and improved air quality. Refusal letters emphasise the benefits of addressing the issue, reassuring tenants that the improvement works are cost-effective/important and will not negatively affect them.

Property Care Officers (PCOs) undergo bespoke training on the specific products used for mould treatment. The Trust also led a Mouldex training session for staff, including operatives, surveyors, and those involved in the damp and mould (D&M) process. Additionally, both PCOs and the D&M Coordinator, attended the Mouldex training. The PCOs complete mandatory relevant Health & Safety (H&S) training, including Manual Handling and COSHH, which are part of their role's ongoing compulsory training. While individual certificates for these sessions are not available, they are documented in personnel records. Further training courses for the PCOs have been identified and will be scheduled in the new financial year.

For both PCOs, the mandatory training courses that need to be completed for their role include health and safety training, manual handling and asbestos awareness, as well as a Condensation, Damp and Mould course. Certificates were evidenced for both the PCOs to show that they have completed the Mouldex training course module except in one case where there is an outstanding asbestos awareness course. However, the Trust explained this was missed due to an absence so are aware of the outstanding module and it will be rebooked as soon as is possible.

A sample of 20 damp and mould cases were selected for testing to ensure the correct process was being followed. It was found that all cases were assessed by one of the Property Care Officers (PCOs) who have sufficient qualifications and training to assess damp and mould issues, and to complete small scale resolutions where possible. Following the assessment, works orders had been raised correctly for all 20 of the sample. For three cases in the sample the third-party were unable to complete work due to an issue gaining contact with the tenants, rather than by any fault of theirs or the Trust. Where work was completed by an outsourced third party the Trust was able to provide evidence of job completion forms with photographic evidence included once the work had been completed.

When looking at the assessment timescale, the Trust procedure states assessments must be completed within seven days of the issue being logged. For the sample it was found that in only three instances this was not the case with assessments being completed outside the seven-day window. **(Operational effectiveness matter 1 refers).**

Delivery Risk:

Failure to deliver the service in an effective manner which meets the requirements of the organisation.

Ref	Expected Key Risk Mitigation		Effectiveness of arrangements	Cross Reference to MAP	Cross Reference to OEM
PM	**Performance Monitoring**	There are agreed KPIs for the process which align with the business plan requirements and are independently monitored, with corrective action taken in a timely manner.	Partially in place	1	1
S	**Sustainability**	The impact on the organisation's sustainability agenda has been considered.	Out of scope	-	-
R	**Resilience**	Good practice to respond to business interruption events and to enhance the economic, effective and efficient delivery is adopted.	Out of scope	-	-

Other Findings

The Trust updates the corporate dashboard on a monthly basis, which is presented to the Board, Audit and Risk Committee and People and Places Committee. The reports for September, October and November 2024 were provided as evidence. These reports cover the Trust's performance against damp and mould key performance indicators. Alongside this the Trust produces quarterly reports that go into more detail regarding the KPIs and any variance from the target values using specific case examples where necessary. Evidence of performance delivered to People and Places Committee on 20th July 2024 was reviewed. As part of this report, there was a presentation given surrounding the performance for damp and mould KPIs which relate to investigating reports of damp and mould, and correcting the issues identified, showing that discussions surrounding damp and mould performance are being held at a committee level.

Scope and Limitations of the Review

1. The definition of the type of review, the limitations and the responsibilities of management in regard to this review are set out in the Annual Plan. As set out in the Audit Charter, substantive testing is only carried out where this has been agreed with management and unless explicitly shown in the scope no such work has been performed.

Disclaimer

2. The matters raised in this report are only those that came to the attention of the auditor during the course of the review and are not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. This report has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this report and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our report.

Effectiveness of Arrangements

3. The definitions of the effectiveness of arrangements are set out below. These are based solely upon the audit work performed, assume business as usual, and do not necessarily cover management override or exceptional circumstances.

In place	The control arrangements in place mitigate the risk from arising.
Partially in place	The control arrangements in place only partially mitigate the risk from arising.
Not in place	The control arrangements in place do not effectively mitigate the risk from arising.

Assurance Assessment

4. The definitions of the assurance assessments are:

Substantial Assurance	There is a robust system of internal controls operating effectively to ensure that risks are managed and process objectives achieved.
Reasonable Assurance	The system of internal controls is generally adequate and operating effectively but some improvements are required to ensure that risks are managed and process objectives achieved.
Limited Assurance	The system of internal controls is generally inadequate or not operating effectively and significant improvements are required to ensure that risks are managed and process objectives achieved.
No Assurance	There is a fundamental breakdown or absence of core internal controls requiring immediate action.

Acknowledgement

5. We would like to thank staff for their co-operation and assistance during the course of our work.

Release of Report

6. The table below sets out the history of this report:

Stage	Issued	Response Received
Audit Planning Memorandum:	17th May 2024	17th May 2024
Draft Report:	13th January 2025	21st January 2025
Final Report:	23rd January 2025	