

Housing Ombudsman: call for evidence on damp and mould

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Introduction

The Housing Ombudsman has asked for evidence about damp and mould in social housing. This is the response of the National Housing Federation to that call for evidence.

The National Housing Federation is the trade body for housing associations in England. Our members provide homes for around six million people, providing good quality homes that people can afford.

The quality of their housing is of paramount importance to housing associations. Their purpose is not simply to provide housing for those in need but to ensure that their housing stock is suitable for its purpose, kept in good repair, warm and secure, and conducive to the good health of the occupants.

Across all sectors, the English Housing Survey reports that damp was an issue in 7% of privately rented dwellings, compared with 5.1% of council homes, 4% of housing association properties, and 2.1% of owner-occupied dwellings.

While issues of damp and mould may occur in housing in all sectors, they may be seen as more of a concern in the social housing sector because residents are likely to be disadvantaged already by other factors such as a low income, disability, infirmity or ill health. They have less scope than private sector residents to move home and less agency over the dwelling than owner-occupiers. Social landlords, including housing associations therefore recognise the particular importance for them and their residents of preventing damp and mould wherever possible and of successfully dealing with them when they occur.

Housing associations are always striving to improve their service to residents and are committed to learning from any instances where they have not addressed issues of damp and mould effectively. But in the great majority of cases they are able to deal with damp and mould quickly and effectively, as set in this response.

Damp and mould in social housing: general points

The Housing Ombudsman asked five specific questions:

1. What do you consider to be the main cause(s) of damp and mould?
2. Are the root causes of damp and mould difficult to identify? And if so, why?
3. Are the root causes of damp and mould difficult to address? And if so, why?
4. While damp and mould issues are being looked into, what support is offered to residents to ensure they are able to live in a hygienic environment?
5. Has a particular damp and mould situation led to significant changes in the way in which a landlord operates? If so, please provide details.

With regard to the first three questions, damp and mould are closely linked. Where a property is persistently damp for any reason, mould is a likely consequence. So the underlying issue is the reason for the damp.

The general term 'damp' actually covers three possible problems with distinct causes.

- Penetrating damp, meaning that moisture outside the building (chiefly rain) is able to enter the building as a result of disrepair or some structural defect. This will almost always be the landlord's responsibility to rectify.
- Rising damp, meaning that ground moisture enters the building, often being drawn up through the brickwork by capillary action (for instance if the damp course has failed or been compromised). Again, this will almost always be the landlord's responsibility.
- Condensation, which forms typically on windows or other surfaces resulting from such causes as excessive humidity within the property, poor ventilation, or a steep temperature gradient between the inside and outside. It will usually be the landlord's responsibility, although other factors may also play a part and it is sometimes very difficult to identify the exact reasons for condensation in a particular property.

Because penetrating damp and rising damp result from disrepair or from structural issues, they are almost always the landlord's responsibility and are, in most cases, relatively straightforward to diagnose.

The most intractable problems are associated with condensation, because a number of different factors may be involved. Even experienced surveyors with expertise in the field cannot always be sure of the reason for persistent condensation in a dwelling.

In many cases, a condensation problem can be resolved through technical adjustments such as improving insulation, installing extractor fans or supplying dehumidifiers. In some instances, however, technical changes may not be sufficient and it needs to be recognised that poverty is often a significant factor in itself, manifesting in overcrowding or in the resident's inability to meet the costs of adequately heating the property.

The effects of poverty are particularly salient in social housing because it is let on the basis of need and a high proportion of social housing tenants are on very low incomes. Housing

associations routinely work with tenants to ensure that they are receiving the benefits to which they are entitled, and of course anything that improves tenants' access to benefits will help them to avoid fuel poverty. Some housing associations maintain links with fuel poverty charities with whom they can put tenants in touch as a source of information and advice independent of the landlord.

Social housing tenants, especially those on extremely low incomes, may struggle to afford to heat their homes properly. In addition, residents suffering fuel poverty may also keep windows tightly closed and block ventilation systems such as airbricks in an attempt to preserve whatever heat there is. This is an understandable response on the part of the resident but unfortunately it also creates conditions in which air circulates very slowly and the interior of the property becomes humid which can lead to condensation.

Another issue closely related to poverty is that of overcrowding. This has a major impact because when more people occupy a given space, humidity will tend to be higher and this increases the likelihood of condensation.

On a related point, the closure of workplaces and schools during the lockdown means that many tenants and their families have been spending a higher proportion of their time at home so that the property is, in effect, more fully occupied than usual. This will also tend to increase the risk of condensation.

Heating and ventilation: striking a balance

It is important to acknowledge that there is an unavoidable tension between heating a home and ventilating it, and it is essential to strike the balance between the two. Housing associations work with tenants to find the right response.

The approach will vary from case to case but may include installing more effective ventilation, such as extractor fans, supplying a dehumidifier, or anti-mould treatment. In many cases, landlords are able to modify the home, for instance by installing loft insulation so that more heat is retained.

It is also important to ensure that residents are aware of the factors that can give rise to condensation and how they can be mitigated.

Net zero carbon: the direction of travel in the sector

Achieving net zero carbon in the sector will involve substantial changes to the way properties are built, heated and ventilated, and this will generate opportunities to address problems that may cause damp, in particular condensation.

It is difficult to overstate the importance of adequate ventilation in preventing condensation and this was a recurring theme in comments we received from National Housing Federation members. We welcome the attention given to the importance of adequate ventilation in the recent government consultation on the Future Building Standard.

Views from housing associations

We have been greatly assisted in responding to the call for evidence by comments received from our member housing associations. These comments demonstrate both the importance housing associations attach to the issue of damp and mould and the strenuousness of their efforts to address it.

For example, one member commented that they have “employed an in-house damp/mould surveyor who visits every property where this is reported and completes a technical report that is used as the driver for follow-up action. At high level we have found that a minority of our cases relate to structural damp (defects) and these cases accounted for the majority of our spend in this area (roofing, extractors, damp-proof course, etc.). The remainder of the cases were condensation related, and our offer here is to carry out a mould treatment, make any referrals that may be available for financial support and offer a referral an independent fuel poverty charity for support with energy bills/tariffs.”

Another member reports that in 2019 it revised its approach to managing damp and mould, improving training for housing officers and other staff to help them identify and address issues, and more tightly monitoring responsive repairs to ensure damp and mould are dealt with swiftly. They are also now providing clearer guidance for residents. “Since then,” the member states, “we have seen a significant reduction (nearly 40%) in the number of reports.”

The same member adds, “We will attend the home to conduct an inspection of the damage and undertake a comprehensive risk assessment on harm to the resident. This could result in a range of actions to support the resident depending on their circumstances, including providing and funding dehumidifiers, the installation of positive pressure ventilation systems and mechanical systems, dry line walls or applying mould resistant coverings. In the most extreme circumstances, where there is a serious health and safety risk to the resident, we will provide alternative accommodation while we make necessary repairs or improvements.”

Another member makes similar points. “There are various contributing factors to a condensation issue and although residents’ lifestyle does often contribute, it’s imperative that landlords address all condensation issues consistently. We ensure we inspect all cases when we are notified of damp, mould or condensation and agree work to address the specific issues. We also provide advice and guidance to residents where appropriate.”

The same member refers to physical works to the property to tackle the problem. “Where there is mould growth, the immediate action would be to complete a mould treatment to affected areas and supply dehumidifiers if appropriate. Where there is a significant case of damp and mould which has resulted in the property being uninhabitable, requiring intrusive work, we would offer alternative accommodation for the duration of the work, along with a disturbance payment to assist with removals, furnishings etc.”

Several members make the point that condensation presents the greatest difficulties. For instance, “It is in our experience much more difficult to address condensation-related mould. Our view would be that a fundamental underlying cause is fuel poverty, which drives under-heated homes and increases the likelihood of this outcome. In this scenario our options are

more limited. We will attempt to increase the flow of air through the property, advise residents against activity that increases internal moisture (e.g. unvented tumble dryers/drying laundry on radiators), or to advise heating the property more consistently.”

The difficulties of dealing with condensation are stressed by another member. “Everyday activities inside the home add moisture to the air which can generate condensation. This includes, but is not limited to, drying clothes inside, cooking, boiling a kettle, washing up, and bathing and showering. If measures are not taken to combat the levels of condensation then mould can form. Such measures might include reducing the level of moisture, ventilating kitchens and bathrooms by opening a window or using an extractor fan, wiping moisture away, and keeping a home warm.”

However, even where lifestyle issues may be a factor, it is essential to acknowledge the underlying causes. The same member goes to say, “Someone might dry their washing indoors because they cannot afford a dryer or its running costs, do not have space for a dryer, or do not have space to dry clothes outdoors. While opening windows can ventilate the home and reduce condensation, this also allows cool air to enter meaning the resident will either get cold or have to pay higher bills to keep their home warm.”

Inevitably there are limits to what housing associations as landlords can do to address the underlying problem of fuel poverty. Nevertheless, they do what they can. “Our Customer Support Team helps our residents by working with them to improve their finances and ability to pay for their home, as well as finding the right external support agencies to help. In 2020/21, they helped 12,455 residents who were experiencing some form of financial hardship to claim over £13.3m in welfare benefits they were entitled to. [In addition,] through our Hardship Fund we provided 996 residents with emergency funds to pay for food and fuel. We have seen an increase in fuel poverty amongst our residents with the majority of the Hardship Fund over the last three years going towards emergency funding for heating.”

Housing associations also looked beyond immediate pressures to consider how the issue of damp and mould may change in the future.

One pointed out that, “Now properties are being constructed with better design and materials, damp issues are less frequent and so easier to identify as a single issue.”

However, it was also argued that the range of contributing factors includes some that are outside the control of landlords. “Some of the wider questions we should ask are about the role of the energy providers and pay-as-you-go meters, government energy policy for low income households, health impacts and costs arising from fuel poverty, and how we make homes more energy efficient for those most in need.”

Finally, it was suggested that the drive to net zero carbon creates an important opportunity. “We look to improve the energy performance of our stock and get buildings net zero ready. Smart ventilation will be required in properties and this should help reduce condensation issues. It’s something we should be looking at when we revise our void standard on the net zero roadmap. Also if we can identify the properties via archetype/insulation type etc., we can have improvement programs running as part of our energy efficiency programmes.”