

Summary of Clarion's response to the Regulator of Social Housing's letter on damp and mould



1. Please detail your approach to assessing the extent of damp and mould issues affecting your properties, including how you assess the prevalence of category 1 and 2 damp and mould hazards

Clarion has adopted a broader approach to managing damp and mould cases. Through our work with the Housing Ombudsman it was clear that persistent leaks, often between homes or leaks that are difficult to trace, are a frequent cause of damp and mould cases. For that reason we have widened our assurance scope to include leaks.

In July 22, our Board approved our Asset Condition Strategy – A Plan for Every Home - that sets out our new approach to gathering intelligence on our homes and estates. Through this strategy, we will deliver a stock condition surveys programme of all our homes over the next four years containing details on the condition/presence of all housing health and safety rating systems (HHSRS) hazards, including the presence of damp and mould. Our stock condition surveys programme was developed using a risk based approach, ensuring that we focused on areas of density that had either limited stock condition survey data and /or where the surveys were older.

We've also identified a number of areas where we can improve our assessments including:

- External roof assessments – completing drone surveys to all blocks four stories or higher with an on-going inspection programme to be implemented from 2023-24 onward. This solution captures pictures of the facades of all blocks within the programme meaning our intelligence gathering to the fabric / external envelop is the most comprehensive. We're also using this as an inspection solution for our in-house repairs provider (Clarion Response) to enable a rapid and cost effective solution to identifying and diagnosing water penetration at height.
- Commercial plant inspections – developing a programme of inspections including ventilation systems to assess condition. This has been mobilised and is managed through our dedicated Asset Investment Mechanical & Electrical team.
- Remote monitoring – deploying monitoring devices in properties that we know and/or suspect could suffer from leaks, condensation, damp and mould.
- Retrofit – targeting our hardest to heat homes, which have a high propensity to suffer from condensation, damp or mould, ensuring that we have appropriate ventilation strategies deployed. We have delivered retrofit works to approximately 560 homes by March 2023 and have a forward programme of identified properties of 5,300 homes over the next three years.

All of the above data is fed into the 1+5 year programme process, ensuring data drives our investment decisions. In addition there is a qualitative review through our Regional Investment Planning meetings (held quarterly) with regional housing/surveying teams to ensure that we also understand the colleague and resident perspective on investment programmes and can review our data-driven investment programme in this context.

All the above has been approved by the Group Executive Team and the Housing Association Board and forms part of our long-term financial plan.

2. In the context of the approach set out in question 1, please provide details of your most recent assessment of the extent of damp and mould hazards in your homes, including the prevalence of category 1 and 2 damp and mould hazards

In respect of HHSRS category 1 fails, we already take those into account in our Decent Homes reporting. Whenever a failure is flagged, this is assigned to our repairs partner to resolve as a priority and tracked to completion. The number of HHSRS category 1 cases reported between 1 April 2022 and December 2022 relating specifically to damp and mould is 21, which translates as a percentage of 0.6% of all HHSRS surveys completed.

3. Given the findings of the assessment, please outline the action you are taking to remedy any issues and hazards, and ensure that your homes meet the Decent Homes Standard

Our Asset Condition Strategy has captured many of the necessary improvements. In addition, our asset investment programme enables local intelligence to be referred through our refreshed online referral process. The process enables us to track cases through to completion and provide senior leaders with clear visibility.

We are rolling out our reactive major works programme nationally following a successful trial. Reactive major works are defined where works are too big and/or complex for routine repairs, whilst not distracting planned teams to work reactively. The improvements will lead to:

- Improved visibility of these type of works
- Improved governance and controls (both financial and operational)
- Enhanced tenant communications and engagement
- Quicker end to end resolution timescales

We have accelerated our programme to install remote monitoring equipment into more tenants' homes (Switchee or other) with an initial programme of approximately 500 devices to be installed during 2023-24.

Alongside this, we are also completing proactive property MOTs to target homes, with no outstanding repairs, that have reported repeated cases of mould in the last 2 winters.

4. Tell us how you ensure that individual damp and mould cases are identified and dealt with promptly and effectively when raised by tenants and residents

When a resident reports an issue in their home, a multi-trade operative will be appointed to the job. In cases of damp and mould, we would expect the operative to have identified and completed any works required. This could include mould treatment, checking guttering, assessing and fixing any leaks and providing appropriate guidance to the resident. We also assign a resident liaison officer, who will follow up with the resident and keep the resident updated until the case is resolved.

We have made a number of changes to how we are working to resolve cases reported by residents, or on behalf of them. Key changes include:

- Recruiting 100 additional frontline staff to help us increase resolution speed and the support available for residents, including additional resident liaison officers and surveyors.
- Adding a specific category for raising jobs related to persistent leaks or condensation, damp and mould to enable us to increase visibility and deploy accelerated response times.
- Changing the internal targets for attending leaks, condensation, damp and mould jobs which meet the criteria.
- Creating new reporting channels for our customers to report concerns.
- Referring cases to surveyors if there is a repeat instance of damp and mould or building surveyor advice is required.
- Prioritising cases which involve vulnerable residents. For example, where there are young children in a household or identified underlying health conditions that could be impacted by condensation, damp and mould.
- Increased investment in humidity and ventilation monitoring devices to enable early identification of problems – we've already installed 120, with 450 due to be installed soon. As we identify more homes that can benefit, we will install more.
- Enhanced training for all colleagues and new reporting systems – this includes a one day in-depth training programme for surveyors.
- Delivering property MOTs – including properties with known leaks, condensation, damp and mould issues – to identify and resolve all issues.
- Using our 'Every Visit Counts' policy to ensure that if colleagues are in a property fixing a separate problem, they look for condensation damp and mould and report any issues.
- Delivering role based briefings to our people so they understand their role in the management of cases and the importance of excellent customer engagement and record keeping.
- Implementing an improved no access process for leaks, condensation, damp and mould cases which will enable us to escalate more quickly, whilst ensuring full compliance with legal requirements and taking into account resident needs.
- Introducing a new policy setting out how we will respond to reports of leaks, condensation, damp and mould.
- Reviewing our management transfer policy to include the ability to move residents if necessary.
- Making a series of changes to our repairs management system which will enable us to more effectively schedule work and enable changed ways of working.

We're continuing to develop our response plan, learning from the findings of individual cases and from our residents and colleagues to identify how we can continue to improve the service provision.

Ways of working:

We've introduced escalation points within our teams to ensure that cases can be reviewed and decisions made quickly. We've communicated to all staff within our Customer and Property

Directorates, informing them how to raise new cases, check for updates and escalate any cases of concern. This provides a consistent approach to how we'll log and respond to new cases, but also provides an exception management approach in cases where any member of staff has a significant concern. In these scenarios, we'll accelerate our management approach and make rapid decisions on where we divert from the standard process.

Training and equipment:

We have introduced organisation wide training on leaks, condensation, damp and mould management to ensure that everyone at Clarion has a good understanding of the issue and how we're tackling it – 95.44% of Clarion staff have now completed this. Alongside this general training our surveyors, multi trade operatives and resident liaison officers have completed specialist training on condensation, damp and mould with an external provider. This training covered topics such as what mould is and what it needs, the correlation between heating, ventilation and insulation and customer support and education. We're also refreshing all equipment for our surveyors to provide them with more tools to enable the effective identification of the root cause of leaks, condensation, damp and mould. This includes items such as thermal imaging cameras. We've also deployed a number of monitoring solutions (Switchee) in more complex cases to provide data to support us to develop management plans with our residents.

Resident and stakeholder communication and engagement:

We have written to all of our customers with advice on managing leaks, condensation, damp and mould in their home and how to report any concerns. This information leaflet was reviewed and approved by our engaged residents. We've also developed a video with further advice and guidance for our customers which is available on our website. As we move forward, we'll continue to look for opportunities to engage our residents in our response to leaks, condensation, damp and mould and will be inviting affected residents to join our focus group.