

	Recommendations	Comply:	Evidence, commentary, and any explanations
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.	✓	<ul style="list-style-type: none"> There is a zero-tolerance approach to damp and mould. This has included proactively encouraging residents to report cases and providing clear instructions to all operational teams to proactively identify cases in the course of their work. Damp & Mould training has been delivered to all operational staff, supporting our new Damp and Mould Policy. This policy was created considering the views of residents which were gained during a structured engagement activity. For all reported cases of damp and mould, staff complete a thorough inspection and conduct repairs. Following increased reports of damp and mould in winter months, additional seasonal resources is allocated to respond to reports and undertake required works. Ongoing improvements and refinements are overseen by a Damp & Mould Steering Group made up of senior staff up to and including relevant Executive Directors.
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.	In progress	<ul style="list-style-type: none"> A specific Damp and Mould Policy was introduced in May 2022, informed by customer engagement and feedback (as above). Prior to this damp and mould was covered within the Responsive Repairs policy. Cases of damp and mould are triaged at first identification or first report, to ensure cases are prioritised, given appropriate priority, and addressed as effectively as possible – including consideration of any health conditions or vulnerability in the household. A proactive approach is taken to identifying and contacting residents where it could be considered more likely that damp and mould may present in the home (eg based on how many reports of damp and mould occurrences, along with vulnerabilities, etc) as well as proactively contacting residents who may be at increased risk of the impact of damp or mould due to health conditions, to confirm there are no issues in the property. An 'aftercare' process is already in place for the most significant cases of damp and mould, whereby those residents are revisited after works have been completed to ensure remediation actions have been successful. It is intended to extend these aftercare checks more broadly – contacting all residents who report damp and mould after 3, 6 and 12 months of remediation works having been completed.
3	Landlords should review the accessibility and use of their systems for reporting repairs and making complaints to 'find their silence'.	In progress	<ul style="list-style-type: none"> There are a range of ways services can be accessed, to ensure residents have choice. Repairs and complaints can be made by telephone, email, through the website, in person, by letter, or through social media platforms. To support different language requirements and improve accessibility to online services, the website provides the option of 29 different languages. An interpretation service is also available for residents making contact by telephone. Every tenant was sent information about damp and mould, which also included information on reporting a repair or making a complaint. This information was reiterated in the Resident Magazine which was sent by post to every tenant. Any resident who has not made contact or received contact from Guinness for more than one year is contacted to ensure they have the support they need and to confirm there are no issues in the home. Our in house operatives complete property condition risk assessments which provides feedback on household condition and safeguarding needs
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.	In Progress	<ul style="list-style-type: none"> Guinness conducts data analysis on homes within blocks and at a scheme level to monitor trends and identify possible works that could proactively prevent damp and mould problems – as an example, 1,000 homes have been identified as potentially benefiting from the installation of new fans and this work will be carried out. A process in place whereby inspections are carried out to homes that neighbour a property which has experienced significant damp and mould problems. Service managers completing these inspections complete a ten-point checklist to ensure all relevant damp and mould guidance is considered when completing these inspections. Our new Major Repairs team are now looking at multiple damp, mould and condensation repairs raised at scheme level and actively visiting homes to identify investments that may be needed.
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.	In Progress	<ul style="list-style-type: none"> Data on reports of damp, mould and condensation over the last 18 months have been analysed to identify any trends and themes relating to property characteristic – such as year of construction, construction materials and structure, EPC rating. Number of household occupants is also considered. This data is actively used to identify potential risk of damp, mould and condensation, and proactive visits to properties are undertaken to confirm whether there are any issues so appropriate action can be taken. Data analysis is also used to highlight repeat damp and mould cases to ensure root cause identification is carried out and necessary action taken to remediate the problem. We now use data to predict damp, mould and condensation issues to predict which homes could be at risk of disrepairs, we then actively homes taking a pro-active approach.

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.	✓	<ul style="list-style-type: none"> The Guinness policy is to meet landlord responsibilities in full and deliver all required repairs irrespective of any future plans or proposals for a potential stock transfer, or regeneration of a scheme.
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.	In Progress	<ul style="list-style-type: none"> Clear guidance has been provided to staff, including through face-to-face briefings with all operational teams. The guidance outlines the approach to supporting residents, showing empathy and ensuring the resident is not blamed and that there is no reference to 'lifestyle'. Where a case is not driven by property factors, the important role in supporting residents to address non-property factors is understood by staff. A range of support and guidance is provided to residents, including an online cost-of-living hub and the services of a dedicated Customer Support team. The support includes financial assistance for fuel, food or furniture, as well as working closely with or making referrals to external agencies where more specialist support may be required. Welfare checks and property condition surveys are taking place across August and September 2023 for homes where we have had significant reports of damp and mould and vulnerabilities recorded which includes an assessment of property condition. This helps identify where damp and mould may not have been reported, or where it has been reported but should now be considered a higher priority case. An end-to-end damp and mould process is in place to help ensure that all cases are properly diagnosed and prioritised. This helps ensure that no resident is left without the offer of a repair or support. A significant financial hardship fund is available to help support residents to heat their homes. In the last 12 months Guinness has supported several thousand residents. Specialist Energy Advice Officers are also available to provide residents with advice on reducing energy costs, using heating systems efficiently and effectively, and ensuring utilities are on the most economical tariff available in the circumstances.
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.	✓	<ul style="list-style-type: none"> The relevant material, including customer welcome packs, has been fully reviewed with residents to assess the tone, content, and effectiveness of the guidance. It is aimed at being easily accessible and is published on the Guinness Customer Portal. Guidance for residents on support available, including printed leaflets, is carried by staff and contractors who attend properties. The content of leaflets and online content has been refreshed. Advice is played within the IVR when residents call the Customer Service Centre.
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.	✓	<ul style="list-style-type: none"> A full property inspection for proposed mutual exchanges is carried out by staff on a risk basis. Where it is considered that a mutual exchange inspection does not need to take place in person, the inspection is carried out by video call – if this identifies the need for a property visit, this is carried out. Where repairs are identified during a mutual exchange inspection, this can result in a repair action plan being agreed and delivered. Void works include any works necessary to address damp and mould prior to a property being relet.
10	Landlords should ensure their strategy for delivering net zero carbon homes consider and plans for how they can identify and respond to potential unintended consequences around damp and mould.	In progress	<ul style="list-style-type: none"> Retrofit assessors and co-ordinators are in the process of being procured. Their role will include ensuring these adverse consequences have been avoided in line with PAS2035. This is good practice and should minimise negative impacts on damp and mould.
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.	✓	<ul style="list-style-type: none"> Training and guidance have been provided to all customer facing teams to refresh staff on how to handle initial reports of damp and mould. As noted above, the emphasis is to show empathy and identify solutions, not blame residents nor refer to 'lifestyle' factors.
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.	✓	<ul style="list-style-type: none"> All damp and mould cases are recorded in core systems, with detailed accounts of all action taken as well as next steps required – this information is regularly monitored to ensure remediation works are being delivered and that these are successful. As noted above, data analysis is used to identify trends and risks to enable proactive action to be taken.

13	Landlords should ensure that their responses to reports of damp and mould are timely and reflect the urgency of the issue.	✓	<ul style="list-style-type: none"> All reports of damp and mould are triaged by severity, individual resident need, household composition, and vulnerability. Urgent or emergency repairs are fast tracked. Other repairs are scheduled in line with Guinness policy.
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.	✓	<ul style="list-style-type: none"> All damp and mould repairs are monitored for completion by the agreed date and to ensure the works have resolved the situation. The root cause of missed appointments is investigated. With appropriate support provided to residents who may cancel or refuse access, using customer facing teams to carry out welfare visits where appropriate.
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.	In progress	<ul style="list-style-type: none"> Training has been provided to operational teams to ensure they are able to identify and report cases. Further damp and mould training relating to repairs and disrepair is planned in the coming months. Established reporting mechanisms are in place to enable gas contractors (who visit over approximately two-thirds of all homes each year) to easily report damp and mould cases. This is working operationally with reports regularly received.
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.	In Progress	<ul style="list-style-type: none"> An inspection guide and checklist has been implemented to provide clear guidance to all surveyors who visit homes. Recruitment of specialist Managers is underway – these specialists will focus on more complex damp and mould cases and disrepair cases. Staff members responding to initial contact from residents have been provided with additional resources to assist with first point of contact diagnosis of reports of damp, mould and condensation – this includes access to example photos and videos. An e-learning module has been developed and is available to all staff (and required for learning for customer-facing staff), along with face-to-face training for front-line staff. All Repairs Service Managers attended an in-depth, externally delivered training course on Damp, Mould and Condensation during May 2023.
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.	✓	<ul style="list-style-type: none"> Residents are provided with regular information regarding damp and mould including updates relating to reported cases. All relevant policies are regularly reviewed and updated.
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.	✓	<ul style="list-style-type: none"> There is a dedicated Complaints team responsible for the end-to-end complaint handling process and root cause analysis. The complaints team communicates with all areas of the organisation to ensure all actions required to resolve a complaint are completed. In addition, root cause analysis and preventative future actions are identified by the complaints team to underpin organisational learning. Root causes are regularly reported to the Guinness Executive Team and Board.
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.	✓	<ul style="list-style-type: none"> The Complaints Policy clearly sets out all complaint handling requirements to meet the requirements of the Housing Ombudsman's Complaint Handling Code. Each complaint, and any associated compensation award, is considered on a case-by-case basis. This takes into consideration personal circumstances and the severity of impact that any failings may have had on household members. Remedies offered reflect the extent of failure and the level of detriment caused to the complainant. Compensation awards are in line with the Complaint Handling Code and the Housing Ombudsman remedies guidance. These are reflected in the Compensation Policy.
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.	In Progress	<ul style="list-style-type: none"> Customer alert flags are used to enable services to be tailored in line with the residents' individual needs and circumstances. A damp and mould checklist is carried out during each resident visit to ensure root causes, and particularly complex cases, are identified. Complex cases, which may involve temporary moves, are dealt with in line with the Complaints Policy. Residents are regularly updated on progress by the assigned repairs service manager or customer liaison officer.

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 be clear on next steps. Landlords should then act on accepted survey recommendations in a timely manner.	In Progress	<ul style="list-style-type: none"> Guinness completed specific relevant technical training in May 2023, and this is planned to be rolled out to our Customer Liaison Service in September 2023 Inspections are carried out by a fully trained individual. All inspections are recorded in dedicated software to enable reporting to be carried out. This includes the recording of photographs. Where an independent specialist is required where there is any dispute, for example for structural issues, a suitably competent and qualified independent specialist is appointed. All aspects of the inspection are fully recorded. A repairs action plan, as a result of the survey, is agreed with the resident.
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.	✓	<ul style="list-style-type: none"> When work is needed to a resident's home to meet a repair obligation, but the work cannot be completed safely or comfortably while the customer is living in the property, the resident is given the choice to move out on a temporary or permanent basis in line with the Decant Policy. The alternative accommodation is secured for the resident and all authorised occupants, and the suitability of the accommodation agreed with the resident. Each situation is assessed on a case-by-case basis, enabling Guinness to find the most appropriate housing solution to meet the resident's and household's need.
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.	✓	<ul style="list-style-type: none"> Information is provided about how to make a complaint on the customer facing website, in the customer magazines ('Your Guinness'), by leaflet and in all written complaint correspondence and other customer communications. This includes information about the Housing Ombudsman's Complaint Handling Code. Full details of the Housing Ombudsman service are published on the customer facing website, in every complaint response, in the customer magazines and in the Complaints Policy. When a complaint is received, residents are made aware of the Housing Ombudsman Service. This includes how to seek advice from the Housing Ombudsman Service throughout the life of a complaint.
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.	✓	<ul style="list-style-type: none"> The Complaints Policy sets out all legal, regulatory, and contractual requirements when handling complaints to meet the requirements of the Housing Ombudsman's Complaint Handling Code. A resolution to any complaint is always sought up to the point of a legal claim being filed with court. After this point, the legal team are engaged to advise on seeking a resolution. Work required to resolve a complaint or repair issue are always carried out irrespective of the stage of a legal claim, provided access to the home is permitted.
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.	✓	<ul style="list-style-type: none"> Analysis of the root causes of complaints is used to drive service improvements and promote a positive complaint handling culture. Continuous Improvement (CI) methodologies are employed to help improve and strengthen processes and build an improved customer relationship. The end-to-end complaints process is recorded and measured on the CRM system. A complaints dashboard within the CRM system is constantly monitored. If a complaint highlights a change that could benefit all residents, then this is deployed, potentially leading to changes in a policy, procedures, processes or systems. The Executive Director of Customer Services ensures the Executive Team and Board receive regular information relating to complaints performance. Illustrations of how we have learnt from complaints is included in the annual Residents' Report. This includes details of service improvements that have been deployed.
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.	✓	<ul style="list-style-type: none"> All customer facing staff have appropriate training and support to be able to handle damp and mould reports and complaints. The mindset of listening, understanding, being sincere, taking an empathetic approach to every situation and taking complaints as an opportunity to learn and improve is promoted. All staff are expected to meet specified Guinness Behaviours. These include working together, delivering great service, taking responsibility, making things possible, being professional and principled and doing things well. Adherence to Guinness Behaviours is assessed regularly through one-to-one meetings (coaching) and mid-year and year-end annual performance reviews. All staff are required to respond positively to feedback, act upon it quickly when things go wrong and keep promises to residents. Teams alongside the Complaints function are completing refreshed complaint handling training. Service Improvement Managers, working across operational functions, work collaboratively with the complaints team and other service areas to analyse complaint root causes and implement business improvements. Resident communications have been reviewed to ensure clarity and accessibility. Residents have also received a letter requesting they alert us to any concerns. (All materials are available in translation.)