How Prepared is SDC for the introduction of Awaab's Law?

June 2026

Introduction

We are a group of residents who independently scrutinise the housing services provided by Stroud District Council (SDC) and make recommendations to actively improve the services residents receive.

Our objectives

The group regard damp, mould and condensation (DMC) as a pressing matter for many residents, particularly in the light of emerging evidence of the harm it causes to health and wellbeing. It was the group's intention to carry out this review in two phases; the, first which is covered in this report, focuses on the way in which Stroud District Council has prepared for the implementation of Awaab's law (27 October 2025). A second phase, focussing on tenant and staff feedback was intended but other service area investigations may take priority as advised by the Tenant Oversight Panel (TOP).

Scope

1. To understand how the council prepared for the introduction of Awaab's law
2. The quality of information and training available to staff and councillors
3. The quality of information available to residents on Damp and Mould (DMC)

Our Approach to the Review

As members of the scrutiny group, we shared individual experiences of DMC in our homes. The main issues that emerged from these experiences are bullet pointed below:

- Ventilation (the lack of and resulting impact from condensation)
- Decent Homes Standard (DHS)
- Complete House problem/solution
- Penetrating damp
- Water ingress
- Rising damp
- Health consequences
- Culture of patching up and dealing with one thing in sequence instead of taking a holistic approach and finding the root cause.
- Staff training (vs industry approaches)
- Damp and Mould Action Plan
- How tenants are communicated with

To investigate the subject further we:

- We studied the Housing Ombudsman Spotlight (HOS) Report on Damp and Mould – It's not lifestyle reports (Oct 2021 & Feb 2023)
- SDC's response to the HOS resulting in a Damp & Mould self-assessment (June 2023)
- Carried out a service documentation review including an examination of recent Key Performance Indicators (KPIs)
- Assessed the mandatory training package all housing service staff undertook

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- Reviewed information communicated internally and externally (to housing staff, councillors and residents)
- Shared individual research (by Liz Child) into damp and mould generally, housing and consequences for health and wellbeing.

Our Findings

1. Understanding how the council prepared for the introduction of Awaab's law

The Housing Ombudsman Spotlight (HOS) report on Damp and Mould-it's not a lifestyle (January 2021) advised landlords to proactively review the homes they manage and set out guidance in the form of 26 recommendations. In response, the Housing Service has been proactive in carrying out a self-assessment along with a detailed action plan aiming to implement the rigorous management of damp and mould (DMC) in SDC homes. The new regulation has brought about very tight timescales for landlords to work to, and TAG appreciates the pressure it has put on resources. SDC has therefore acted well in advance of national legislation and regulations coming into force. From our research (see Appendix 1) it is clear that a lot of work was carried out in applying HOS recommendations in the lead up to Awaab's law. This is further evidenced by the drop in numbers of DMC live cases (open more than 12 months), from 253 (the highest recorded number) in June 2025 to 2 cases at the end of Quarter 4 2025/26. Nevertheless, there are still questions regarding progress in relation to a number of actions arising from the self-assessment (June 2023). The group therefore looks forward to reading a progress update due to be reported to the Housing Committee in September.

Stock condition surveys are scheduled to take place on a 5-year rolling programme but remain stubbornly high as the council is still dealing with a backlog from the pandemic. Despite this, progress is heading in the right direction with a percentage of completions going up to 64.9% (Q4 2025/26). However, this figure has not attained SDC's target of >90%. Additionally, there was a drop in the number of surveys carried out in the last quarter, falling from 510 to 318.

While on the subject of stock condition surveys, there have been reports from tenants, who observed that air bricks and trickle vents were not checked for blockages when their homes were surveyed. Since ventilation helps to prevent condensation and the potential for the build-up of mould, it is suggested that these items are included in the stock condition surveyors' checklists.

Quarter 4 (2025/26) KPIs showed that the number of DMC live cases remained persistently high at 319, well above its target of <200. Not surprisingly therefore the DMC live cases as a percentage of stock also missed SDC's target of <4% (at 6.4%).
The scrutiny group recognise however, that the number of live cases is half of what it was in March 2025 when it was 687.

By the end of 2025, the council had contacted tenants of all historic cases to assess current DMC in the property. This resulted in the closure of many historic cases. Follow-up communications to closed cases were also planned over the first two months of 2026. Where damp and mould remained an issue, the historic case has been closed and re-opened as a new case in accordance with the new processes in place for Awaab's Law. After Awaab's Law came into force there were 7 emergency cases, which have since been downgraded to 'significant' following the completion of emergency remedial works. All emergency and significant cases were responded to within legal timescales.

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Decent Homes Standard

The Decent Homes Standard (DHS), which became a statutory minimum standard in 2,006, did not set out regulatory guidance on ventilation in homes for the prevention of damp arising from condensation, and this was one of the scrutiny group's concerns. This has now been mitigated against by Awaab's law and will be further reinforced by the introduction of a new DHS from 2035 which sets out five core regulatory criteria for the improvement of social housing. Two of the criteria (D and E) specifically relate to minimum energy efficiency standards (MEES) and homes being free of DMC.

Another new DHS core criterion (B) concerns key building components such as weathertight wall structures and mechanical ventilation. While there is no explicit mention of passive ventilation systems such as air bricks and window air vents, it is noteworthy, that ventilation is taken into consideration in the case of retrofit projects. This is commented on in SDC's Corporate Asset Management plan and discussed in more depth below.

Complete House problem/solution

Due to anecdotal evidence, TAG was concerned that the importance of ventilation systems (passive and mechanical) may be underestimated in the prevention of DMC. It is hoped therefore, that the ongoing stock condition surveys being carried out will identify any blockages of air bricks and ducting from fans. Moreover, TAG members are agreed that SDC's ambitious and commendable drive to improve the energy efficiency of homes through retrofit programmes must not compromise passive ventilation systems. Will contractors ensure that air bricks will continue to be viable in assisting ventilation when cavity wall insulation is installed, for example? This is an area where tenants' trust must be gained, thus giving consideration to the implementation of post-inspections of contractors' work for assurance purposes. Such misgivings may be allayed on reading SDC's Corporate Asset Management plan which states (page 13) that ""…a data-driven approach will be taken to prioritise properties for retrofit works and to identify the most appropriate improvement measures to utilise for each property. Further, "SDC's retrofit programme is following the PAS2035 fabric first principle…." The core principles of PAS 2035 are:

- **Fabric First:** Reducing heat demand by improving the building's fabric before introducing new energy systems.
- **Whole House Retrofit:** Treating the home as a complete system to deliver optimal results.
- **Build Tight, Ventilate Right:** Preventing issues like dampness by balancing airtightness with proper ventilation.
- **Quality, Quality, Quality:** Setting the highest standards to minimise defects and maximise efficiency.

It could be said that these PAS 2035 retrofit standards are reassuring and address the scrutiny group's reservations as hitherto expressed. However, the issue is really whether contractors can be trusted to carry out retrofit work correctly and to acceptable standards. This is yet another area where tenants' trust should be earned. It is important for the council to ensure that contracts are well-managed and that both stock condition surveys and post inspection work are very thorough.

Innovation

Recently, the council learned of a new appliance known as a TIC Spray System which is a professional, touchless dry-spray machine available for hire. This dual action system eradicates both visible mould on walls or hard-to-reach surfaces and unseen airborne spores in under an hour, therefore ensuring the health and safety of tenants. In addition, this

system can be paired with a mobile app to create an audit data trail and automatically generate certification which is another element of the council's damp and mould strategy. This innovative piece of kit is currently being trialled in void houses and properties affected by damp and mould for a couple of months.

2. Quality of information and training available to staff (and members) on Damp and Mould

As required by the self-assessment action plan, all SDC members, along with the Chief Executive and Director Communities (under whom the Housing Service sits) were invited to a comprehensive presentation in August 2023. The presentation included information about types of damp, its effect on health, forthcoming legislation and the council's planned response. Following the 2024 general election, the presentation was made available to councillors on SDC's Members' Portal. The presentation was not shown to staff across the council, possibly due to its length of one hour.

The Property Care team, Damp & Mould team and Assets Information & Support team underwent Housing Health and Safety Rating System (HHSRS) training in May and June 2025. These teams also attended Toolbox Talks throughout October 2025 to ensure awareness of internal processes. The interactive nature of such talks was also intended to reinforce learning from mandatory online training. More recently, these teams have attended further training on DMC by the Chartered Institute of Housing (CIH).

In preparation for the implementation of Awaab's Law, all staff in the Housing Service undertook mandatory online training between mid-October and the end of November 2025. The training covered the new legislation around the management of DMC remediation in social housing properties in addition to HHSRS. TAG assessed this online training package and found it to be informative, with useful facts and insights, particularly regarding the ambitious and challenging timeframe of Awaab's Law and the broader scope of HHSRS. It was also felt that while in-person training is preferable for better interaction and deeper understanding, there is recognition that online training offers valuable flexibility, allowing participants to complete sessions at their own pace, which helps manage the extensive and sometimes repetitive content. However, the training package was seen as quite difficult to engage with 'in one go'. Also, information about ventilation was notably absent. TAG members also observed that the volume of information delivered in a short time could be overwhelming. Overall, it is clear that SDC has gone to great lengths to ensure staff are trained up and knowledgeable about DMC.

As noted in the HOS report**,** tenancy audits, pre-termination and mutual exchange checks go hand-in-hand with stock condition surveys in terms of identifying DMC issues and updating data already held. TAG is pleased to see that SDC has been proactive in this respect and anticipate that tenancy audits will become part of a regular scheduled programme, not just to identify DMC but to check that properties are kept in good condition in line with tenancy agreements. This could help to make substantial savings by minimising the number of major works to be carried out on voids – as noted in an earlier scrutiny voids review in 2022.

When a property is let, new tenant(s) are given a sign-up pack which includes a leaflet, the 'Moving In Standard'. At the viewing, the lettings officer will go through it with tenants to make sure that the standard has been met and although, the standard does not specifically mention DMC, it does stress that the tenant's new home should be: Clean, Safe, Secure and In good repair.

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Internal Communications

The day Awaab's Law came into force, all members of staff in the Housing Service received an email to mark this significant milestone in social housing. The email, from the Asset & Sustainability Manager, explained why Awaab's Law had come about and outlined the legally binding timeframes for social landlords to address damp, mould, and emergency hazards. The email also included information about how SDC has prepared for the law to date and outlined ongoing plans.

Despite all the council's efforts to fulfil recommendations outlined in the HOS report on DMC, there remain communication issues within the housing service. This can be evidenced by one tenant's experience where they were contacted about DMC remedial work by another contractor two days afterward having work completed, and yet another call was made a week later. This may have been a rare occurrence, but it does suggest that internal communication processes (plus communication with contractors) require improvement in order to prevent duplication/inefficiencies in operational systems. Seamless working is yet to be achieved.

Group communication - experiences of group members

At times, some TAG members felt they were not treated with the dignity and respect they deserved when reporting repair issues, such as damp and mould. In some cases, they felt their reports were not given serious consideration, leaving them with little confidence or assurance. On the other hand, other TAG members have had positive experiences. The group would like to emphasise therefore, that communication has generally improved over the past couple of years, but it is important to highlight the above, so the council continues this trajectory.

3. Quality of information available to residents on Damp and Mould

Just prior to Awaab's Law becoming legislation, the council produced a press release Awaab's Law: what social housing tenants need to know which was published on SDC's website. In addition, the council leader's blog led with news of preparations to meet the new regulations encompassed by Awaab's law. There was no news article published on SDC Housing's Facebook Page, however.

In the Spring of 2026, a full-page piece on the prevention of DMC was included in the tenant newsletter, "Your Home Matters". The article included advice on how to report DMC problems. A leaflet giving guidance about DMC for tenants also became available in May 2026. It has been published to the website and for the moment will be included in tenant sign-up packs.

Information about DMC on SDC's website was updated in preparation for the introduction of Awaab's law and the scrutiny group compared it with the website content of six other social housing landlords (see appendix).
The group noted that in comparison with other social housing organisations SDC's website would benefit from a stronger visual presence and include photographs illustrating different types of damp along with a short video clip. The absence of a communications plan has made it difficult to check exactly the full extent of the council's messaging in this area.

The complaints' policy on the websites of similar landlord organisations was often found to be more accessible than that of SDC's website. In addition to the inclusion of a hyperlink to their policy document, these websites comprised of web pages/page sections which laid out concise explanatory content about the complaints process. TAG members are confident that

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the impending establishment of a Residents' Complaints Review Group will play an important role in helping to improve this area of the service.

SDC Policies relevant to the management of Damp & Mould

SDC undertook a policy and framework review as recommended in the HOS report. As a result, the Damp & Mould policy (2023) was drawn up. In addition, reference is made to different types of maintenance and repairs works in the updated Repairs & Maintenance Policy (2025). Following the advent of Awaab's law these documents and related policies will require further updating.

Overview and Recommendations

The council's preparedness for Awaab's law

Strengths

- Completion of a self-assessment (S-A) and detailed action plan, thereby acting before the government issued guidance in July 2025, two years later.
- Recruitment of two experienced Senior Damp & Mould surveyors (from June 2025)
- The creation of a dedicated Damp & Mould team (to triage DM calls)
- The DMC call centre team follow a process / questionnaire template for triaging reports of DMC
- Ongoing training of Property Care staff including the Damp & Mould team (see July's update below)
- The inclusion of DMC in housing and lettings officer checklists for tenancy audits, pre-termination checks and mutual exchanges.
- SDC meeting its target of having less than 5 open live DMC cases (>12 months) by the end of the last Quarter (2025/26) is evidence that progress is being made in clearing a backlog of DMC cases
- SDC achieved a very low percentage (0.8%) of homes being non-compliant with the Decent Homes Standard - outstripping its set performance target of <5% and outperforming its peers whose average is 2.54%
- Currently working on the procurement of a new asset management system to underpin the identification of trends, recurring issues and property archetypes where DMC are most reported. Such a robust data intelligence framework will boost operational capabilities.
- The implementation of a long-term plan to minimise the risk of resources being overwhelmed by a large volume of stock condition surveys needing attention in a short space of time. This entails the re-programming of dates for surveys coming around sooner.
- The trialling of a TIC Spray System to kill harmful mould in homes, plays an important part in protecting tenants' health and wellbeing and is a welcome initiative. In pairing the system with a mobile app, an audit data trail and certification can also be provided, thus helping towards effective monitoring of the council's damp and mould strategy.

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- A no-blame culture is implicitly cultivated through training and emphasis on resident wellbeing generally throughout the housing service. However, there could be better communication to tenants about aspects of wellbeing in relation to DMC information (help for heating, for example) on the website.

- **July update from Head of Assets & Investment:**

    - the quieter summer months are being used to review damp and mould data, identify trends and hotspots, and target preventative interventions where they will have the greatest impact.

    - The council's in-house Multi-Trade Operatives are being upskilled in damp and mould diagnosis and remediation

    - Innovative solutions such as specialist paints, wall panelling, and improved ventilation systems are being investigate.

Areas for improvement

- Checking for blockages/inappropriate installation of air bricks and trickle vents.

- Data systems, especially systems that connect across the Housing Service

- Internal coordination and culture change in terms of dignity and respect towards tenants when reporting an issue – a co-ordinated attitude and approach with regard to tenants

- Communication that helps to support tenants' trust

- Sustaining the focus on dealing with the stock condition survey backlog

Recommendations

1) Air and trickle vents should be included in the stock condition surveyors' checklists to ensure there is sufficient ventilation to help prevent condensation and the potential for the build-up of mould.

2) The development of an appropriate software programme to assist staff in the management of contracts and documentation of -before and -after inspections (including assurance in relation to the viability of air bricks/adequate ventilation). Such data would also help to inform decision-making in the appointment of future contractors during the procurement stage. See next bullet point.

3) Include two involved tenants in the procurement of the new asset management system. Tenants will want to see how the new asset management system will bring out the efficient management of contracts and documentation in relation to the above point.

4) Thoughtful consideration must be given to communication with tenants where retrofit and regeneration projects are carried out. Residents should have access to information which can assure them that planned work will take account of factors such as ventilation for the prevention of DMC. This communication can be carried

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out in a variety of ways and should be part of a robust communications plan included within the management of projects.

5) To continue the development of data systems and AI, that connect across the Housing Service with the aim of bringing efficiencies. Such efficiencies can bring about savings which can then be spent on investing in stock and staffing across the service. This is especially important given the pressures on resources from current and forthcoming legislation.

6) To produce documentation of processes (maps) and procedures for the improvement of internal coordination and communication.

Quality of information and training available to housing staff and partners on DMC

Strengths

- Training and awareness-raising of staff (across the service) and SDC councillors of the legislation and SDC internal processes.

Areas for improvement

- Communications both internally and with contractors/partners

Recommendations

7) A coherent communications plan which includes an identified officer/team to be responsible for ensuring it is followed

8) To avoid duplication and/or confusion about booking DMC/repair jobs with contractors and tenants, it is suggested that process maps are developed to ensure both internal and partner communication is effective and that the appropriate level of information/detail is provided.

Quality of information available to residents on Damp and Mould

Strengths

- The recently created DMC leaflet
- The work and planning being put into setting up a Tenants' Complaints Review Group

Areas for improvement

- Communications with tenants
- The promotion of DMC guidance at:
  - 6-week settling-in visits to new tenants
  - tenancy audits and,
  - tenant events

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Recommendations

9) The creation of a coherent communications plan which 'sits' with an identified officer/team taking responsibility for it.

10) Revise the presentation of DMC information on the website based on TAG's observations. Guidance should also include details for where residents can obtain advice and help towards heating costs.

11) Enable the complaints procedure (and access to it) to be found easily by tenants and leaseholders and highlight access to the Housing Ombudsman better.

12) To ensure that the Tenant Complaints Group (currently being set up) includes a review of DMC complaints in its Forward Plan.

13) To maximise tenants' knowledge, ensure the 6-week settling-in visit to new tenants includes discussion, and if necessary, advice/guidance on DMC (using DMC leaflet where appropriate)

14) It is suggested that a Damp and Mould Adviser role be created (similar to a Tenant Liaison Officer) to improve communication with tenants.

15) It is also suggested that a digital signage display screen is positioned in Ebley Mill's reception waiting area so that information for residents can be displayed. Advice in relation to DMC could be included.

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Appendix 1
List of Documents

SDC Policies:

- Repairs & Maintenance Policy (January 2025)
- Damp & Mould Policy (July 2023)
- Corporate Asset Management Plan (February 2024)
- Energy Service Standard
- Mutual Exchange Policy (March 2026)
- Gaining Access Policy (November 2024)
- HRA Asset Management Strategy 2025-2028
- Corporate Asset Management Plan (February 2024)
- Moving in Standards - What to expect when you move into your new home

Internal SDC Documents:

- Tenancy Audit Checklist
- Mutual Exchange Checklist
- Pre-Termination Checklist
- Damp & Mould questionnaire template used by the DM Triage Team
- Damp & Mould Update to the Housing Improvement Board (July 2026)

Other literature:

- Housing Ombudsman Service Spotlight on DMC – It's not lifestyle (October 2021)
- Housing Ombudsman Service One year on follow up report: Spotlight on DMC – It's not lifestyle (February 2023)
- SDC DMC Self-Assessment (June 2023)
- Email circulated to all staff with information about the service's obligations in addressing DMC with progress updates relating to the 2023 self-assessment (27 October 2025)
- SDC Damp and Mould Presentation to Members (powerpoint)
- Damp and Mould Service Standard (revised May 2026)
- "Damp and Mould - what you need to know to prevent it." Article in April's "Home Matters" tenant newsletter
- SDC Housing Committee, Member/Officer Report – Agenda item 10 (24 October 2025)

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- Nova Surveyors – Awaab's Law Tenant Awareness & Early Reporting Campaign
- Four Million Homes – Awaab's Law
- SDC Key Performance Indicator Reports Quarters 3 & 4 2025-2026
- Preparing for Awaab's Law: Progress by social housing providers (December 2025), HQN Consultancy
- Opening the door: Changes to support necessary access to social tenants' homes (December 2025), HQN Consultancy
- Decent Homes Standard (DHS) 2006
- Decent Homes Standard (DHS): Policy Statement 2026
- Ventilation Background Debate (from Liz Child)
- Mould – What it does (from Liz Child)
- Comparison of SDC Damp & Mould website to other social landlord websites:
    - Brighton & Home City Council
    - North Yorkshire Council
    - Gloucester City Homes
    - Bristol City Council
    - Wigan Council
    - SDC's planned content
- PAS 2035 information can be found on the National Energy Foundation website PAS 2035 and PAS 2030: retrofit, accreditation and certification

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