

Wolverhampton Homes Open Board Meeting

24 September 2025

Time 10.00 am Public Meeting? YES Type of meeting Wolverhampton

Homes

Venue The Boardroom, Wednesfield Office, Alfred Squire Road, Wednesfield, WV11 1XU

Membership

Mark Ansell
Councillor Paul Appleby
Victor Browne
Darshan Chatha
Councillor Sally Green
Ranjit Kaur
Councillor Zareena Russell
Hannah Semple
Councillor Tersaim Singh
Matthew Tschubenko

Information

If you have any queries about this meeting, please contact:

Contact Business Assurance team

Tel/Email 01902 552956; WHSBusinessAssurance@wolverhamptonhomes.org.uk

Address The Boardroom, Wednesfield Office, Alfred Squire Road, Wednesfield, WV11 1XU

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Agenda

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Item No.	Title
1	Apologies
2	Declarations of interest
3	Minutes of previous Open Board meeting - 18 June 2025 (Pages 3 - 12)
4	Matters arising
FOR INFO	DRMATION
5	Update of Damp, Mould & Condensation mitigation activity and Awaab's Law implementation - Neil Causer, Head of Housing Maintenance (Pages 13 - 44)
6	Compliance update (Big-7), Quarter 1, 2025 - 2026 - Tommy Crowson, Head of Asset Compliance (Pages 45 - 60)

Revenue Budget Forecast for 2025 - 2026 as at 31 July 2025 - James Howse, Interim Director - Finance (Pages 61 - 68)





Meeting: Open Board Meeting

Date: 18 June 2025

Venue: The Boardroom, Wednesfield Office, Alfred Squire Road,

Wednesfield, WV11 1XU

Time: 09:30 – 11:00am

Members in attendance: -

Victor Browne - Board member – Acting Chair (Tenant)

Councillor Paul Appleby - Board member (Councillor)
Councillor Sally Green - Board member (Councillor)
Darshan Chatha - Board member (Independent)
Hannah Semple - Board member (Independent)

Mark Ansell - Board member (Independent) (part meeting)

Matthew Tschubenko - Board member (Tenant)
Ranjit Kaur - Board member (Independent)

Staff in attendance: -

Shaun Aldis - Chief Executive

Julie Haydon - Director – Corporate Services (Company Secretary)

Angela Barnes - Director - Homes and Communities

Ian Gardner-Director - Property ServicesJames Howse-Director - Finance (Interim)Emma Rolinson-Head of People (part)

Jessica Whitehouse - Business Assurance Manager (Minutes)

Michael Hough - Customer Experience Manager Nicky Devey - Head of Business Services

City of Wolverhampton Council: -

Councillor Philip Bateman - Councillor Earl Piggot-Smith - Scrutiny Officer

Jenny Lewington - Deputy Director of City Housing
Justine Oliver Ward - Housing Governance Officer

Observers: -

Theresa Phillips - Observer

1.0	Apologies	
1.1	 Councillor Tersaim Singh – Board Member Councillor Zareena Russell – Board Member Christopher Lue – Tenant Board Member 	
2.0	Declarations of Interest	
2.1	 Victor Browne – Tenant Board Member Matthew Tschubenko – Tenant Board Member 	
2.2	Noted: No specific conflict of interest identified.	
3.0	Minutes of previous Open Board Meeting – 26 March 2025	
3.1	Minutes of the previous meeting agreed as a true record.	
4.0	Matters arising	
4.1	6.2.1 – Report to be updated to show the review and monitoring processes for suppliers' and subcontractors' compliance with the Modern Slavery Act, ensuring regular reviews – This will be included within the Modern Slavery Statement to Board in March 2026 .	
5.0	Introduction to James Howse, Director Finance (Interim)	
5.1	Board members were introduced to James Howse who has taken up the post until December 2025.	
5.2	Update on Board Strategy session this afternoon which will include a focus on the Our Future programme including company finances.	
City of W	Volverhampton Council	
6.0	Flood Response Task and Finish – Earl Piggot-Smith on behalf of Councillor Bateman – Verbal update	
6.1	 Board members were updated on the following areas: Recommendations are tracked via CWC to monitor progress. The three main areas for the review include mitigating surface flooding which is a key element. There are 22 recommendations with a focus on communicating with residents and taking a proactive rather than a reactive approach. 	

- A follow up report will be presented to WH Board in March 2026 to review recommendations relevant to WH to ensure a joined up approach in responding effectively to flooding.
- There is a contractual arrangement in place for the Local Authority with Severn Trent.
- Recommendations are being made to WH to ensure flooding is dealt with effectively.

6.2 Questions / comments:

- Some areas have been more severely affected by flooding in the last few years, than previously and there is a requirement for CWC to review how they communicate warnings to customers for severe weather notifications with improvements made with a focus on flooding.
- Where WH identify areas that require frequent repair due to flood damage or where they identify any solutions i.e. sandbags or flood resistant doors to prevent damage – these are being shared with CWC to improve responses.
- Linked to the Tenant Satisfaction Measures and as part of tenant engagement, WH are contacting local councillors in respect of Let's Talk sessions held across the city. This is to understand from Councillors what some of the issues are for their wards to enable a shared approach where possible.
- Joint liaison there is a live Teams channel with CWC and WH to ensure coordination of responses. This has proved invaluable in providing live updates to key contacts including the Resilience team. Any outstanding actions are picked up from this channel too.
- It was noted that WH properties make up a small percentage of properties across the city and any flood prevention work undertaken by WH may have an impact on other properties and the implications of this need to be assessed where this may affect non-council houses.
- Flash flooding has been seen to have a big impact on properties and cannot always be planned for.
- WH System Development and Support team are carrying out some work regarding the TSMs and how we address particular areas – and further work could be explored to overlay areas subject to flash flooding and also to link in with Homes and Communities to discuss potential support funds.

Thanks were given to Councillor Bateman and Earl Piggot-Smith for the comprehensive information shared. Councillor Green welcomed any future opportunity to link in with the future planning.

Resolved: Board Members noted the verbal update.

7.0 Tenant Satisfaction Measures – Jenny Lewington, Deputy Director of City Housing - verbal update

7.1 Presentation shared with highlights covered as follows:

- Tenant Satisfaction Measures (TSMs) 2024 2025
- Acuity are commissioned by CWC to conduct an agreed percentage of surveys for each managing agent. CWC are required to complete 5% as a minimum per agent.
- It is expected that TMO's will have a higher level of satisfaction than that of a much larger organisation.
- The highest level of satisfaction is repairs and the lowest is complaints handling.
- Complaints handling and ASB are typically low across the sector
- These are perception surveys customers contacted will still be asked about complaint handling satisfaction, even if they have not made a complaint.
- It is important that TSM data is considered alongside performance data.

7.2 Questions / comments:

- Board were advised that the full Acuity report will provide an overview of CWC's position currently this is fairly mid-table and there are lots of details re comparison with other landlords which provide areas of interest.
- Feedback post-repair is high high 90% satisfaction there
 is no trend to this, and across the housing sector, smaller
 organisations out-perform larger organisations. Smaller
 organisations know their customers well, due to the smaller
 numbers of homes.
- WH Senior Management team attendance at Let's Talk sessions to hear customer feedback firsthand.
- Where there are themes identified e.g. communication / repairs – WH are able to take action to improve this.
- Board commented that the question asked following repairs etc., will have an impact on the response given. Board was advised that there are set questions, and we are unable to change them. CWC has given feedback on this – in terms of being specific about what they are asking. If someone gives a response that is dissatisfied, they are asked for more information to ensure themes and resolution are identified.
- Learning can be taken from the surveys, and it is the aim of WH to see an upward trajectory.
- Work is being undertaken with TPAS to capture their advice and support in terms of establishing a better understanding of what can be gleaned from TSMs.
- Useful information comes from the surveys as to how WH can adjust services to improve satisfaction and perception.

- TSMs are received quarterly and published to the public on an annual basis. The reports received from Acuity and CWC provide data in various ways, and a set of recommendations.
- As an example of what WH are looking at with the TSM data

 relates to the specific ward data provided in the report.
 During Q3, Bushbury was identified has being less satisfied and as such provided an opportunity for WH to consider a more specific response to address this. This work is being picked up as part of a wider project to address the TSM satisfaction measures.
- Additionally, a TSM data dashboard is being developed to overlay TSM data, with other relevant data. This will give a wider indication where satisfaction levels are lower, whether there are other data themes, that can be targeted.
- Transactional surveys also take place, providing transactional data in relation to the service provided at that time. The narrative coming through shows that some dissatisfaction is related to home improvements i.e. waiting for a new bathroom or adaptation.
- Confirmation to Board members was provided, that further information has been shared to the WH Board Teams channel.
- Board members suggested WH could consider training trades with customer service skills to ensure high levels of service. WH confirmed that customer service training has taken place – the company has recently partnered with an external customer service provider to co-create a specific customer service training package for trade operatives. This already forms part of the mandatory training requirements.
- Board commented that there is evidence that often the younger customer age group show more dissatisfaction so consideration of targeted communications may help. WH advised that age is one of the protected characterises that is viewed in terms of tenant satisfaction.
- It was confirmed that whilst work is continuing in different areas, customers would receive surveys via the construction partners where transactional survey data is collected.
- Customers could also receive perception surveys from Acuity.

Resolved: Board Members noted the verbal update.

For Policy Approval		
8.0	Discretionary Compensation Policy – Ian Gardner, Director – Property Services	
8.1	Details in relation to the policy was shared as follows: - Performance data with day-to-day repairs is strong – there are areas of complaints where improvement is required i.e.	

- communication issues, access issues, cancelled appointments.
- WH aims to resolve complaints to customer's satisfaction, to support a resolution rather than this needing to be escalated to the Housing Ombudsman. When making early resolution, there is a framework to rely upon.
- WH will continue to report on ongoing costs outside of this policy, the Housing Ombudsman sets their own award levels.
 It is in the best interest of our customers to improve resolution at first point of contact.
- Board were advised that benchmarking against similar providers has been undertaken where possible, with levels comparable to other providers of a similar size, where information has been accessible.
- Board members commented that disrepair claims are an issue and could cost more if not settled early. Board were advised that the policy is not intended to respond to formal disrepair claims, as they are dealt with by CWC Legal Services with WH successful in defending a high majority of claims.
- Board raised concerns around the pause on apprenticeships and that we need to provide mentoring and opportunities etc. Board was advised that this year, WH took a difficult decision that it is not feasible to provide this due to the balance in terms of expectation of the workforce, particularly in repairs with the demand on services. This has to be balanced with staff having time to mentor and develop Apprentices. WH continue to signpost to contractors and sub-contractors, and this has had some success.
- A number of apprentices who will complete their end point assessment (EPA) later this year, will be interviewed for full time posts with a view to being appointed.
- WH is continuing to try to recruit trades roles into longstanding vacancies to offset subcontractor costs.

Resolved: Board Members approved the updated Discretionary Compensation Policy.

For Inf	For Information		
9.0	Wolverhampton Homes - Complaints Report 2024 - 2025 - Nicky Devey - Head of Business Services		
9.1	Board members were updated on the following areas:		
	 Board member responsible for complaints commented on the benefit of the information from the complaints meetings that are held separately. 		

- Following the new guidance from the Housing Ombudsman, it is expected that complaints will increase over the next 6 -12 months.
- Complaints are received via a number of channels with WH aiming to resolve at the first possible opportunity.
- Members of staff can also make complaints via the whistleblowing process.
- Staffing a small number of grievances are in process. Day to day this is managed via HR colleagues and where required (and as previously) Board members have been brought into appeals.

Resolved: Board members noted the annual update on Complaint handling activity.

10.0 Annual Workforce Equality Monitoring report 2024 - 2025 – Emma Rolinson, Head of People

Board members were updated on highlights from the report including:

Board discussed the current staff representation in relation to the WH resident population. It was noted that, while there are specific plans for direct alignment, WH considers this as part of its ongoing commitment to reflect and represent the communities it serves.

- The Head of People and the Head of Talent
 Communications and Engagement, considers the
 demographics of the organisation and measures the profile
 of the workforce. The company invests in 'Grow your own' –
 through apprenticeships and graduate appointments and
 aims to give opportunities to those coming to the end of their
 apprenticeships with regard to available vacancies.
- Labour shortages contractors are used to support this. WH is part of the national terms and conditions, and this brings some limitation to flex pay against market forces.
- WH looks at where we can retain staff where there are market force elements – the pension WH offers is good but will not be required by all – and particularly, based on research, is not so attractive to younger people.
- Board members commented that it seems in the public sector, there are more female employees. Board was advised that the figure has been fairly stable over a number of years for WH, however, in the last 12 months, we have seen a number of male trades retire. We received double the number of male applications for the first time in a number of years. This is potentially due to the nature of job roles advertised. We have seen a number of female colleagues promoted within WH too.

- People leaving the organisation makes the pay gap bigger and Board queried what the reasons are. Board was advised that there was a slight decrease in last reporting period – just under 26% target because of the number of leavers and new starters. WH has seen an increase of applications from ethnic minority groups.
- Over 40% of staff leaving was due to natural retirement with no real trends or any areas of concern.
- Staff turnover is just below 7.2%.
- Talent attraction and retention is carried out around EDI targets and objectives where there are certain gaps i.e. at a more senior level.
- Employee mentoring scheme in place with opportunity for staff at all levels to access.

Resolved: Board Members noted the:

- 1. Key findings of the equality monitoring annual update.
- 2. Pay Gap update.
- 3. Equalities Circle Forum outcomes achieved

11.0 Learning and Organisational Development Annual update 2024 - 2025 – Sarah Butcher, Head of Talent Communications and Engagement

Julie Haydon presented this item.

The report was presented to provide Board member with an overview of key learning and organisational development (L&OD) activities during the year 2024 – 2025 and covers Learning and organisational development, Early careers and Talent attraction and recruitment.

Highlights were shared on progress against strategic objectives, key achievements, and areas for future focus in relation to people development, training, recruitment, and employability opportunities for employees and customers.

Board members were updated on the delivery of impactful outcomes aligned with the City of Wolverhampton Council's strategic priorities – where WH continues to support the vision of strong employment prospects and inclusive, lifelong learning.

Resolved: Board Members noted the:

- 1. the content of the report.
- 2. how the activity on the people and talent development agenda directly supports Wolverhampton Homes' strategic frameworks.

12.0	A.O.B.	
12.1	No other items of business were raised.	
13.0	Date of next meeting	
	- 10 September 2025	



Board Report

	Agenda Item 5
WOLVERHAMPTON HOMES	24 September 2025 Update of Damp, Mould & Condensation mitigation activity and Awaab's Law implementation
	Open Report
Status:	For Information
Author and job title:	Neil Causer, Head of Housing Maintenance
Contact No:	07919 626066
Recommendations:	Board Members are asked to note the current and planned activity to reduce Damp, Mould & Condensation risks arising for customers and the company.
Key risks and contentious issues:	The company has statutory duties under The Health and Safety at Work (etc) Act and a wide range of legislation related to the maintenance of the housing assets under its control, as defined within the Management Agreement with the City of Wolverhampton Council.
	The company manages a range of assets, that if not adequately maintained, inspected, tested or serviced, may cause injury, death or disease to customers, colleagues or the public.
	The company may be vicariously liable for the omissions or failures leading to injury, death or disease of an employee or contractor engaged or managed by Wolverhampton Homes.
	The presence of damp, condensation and mould in our homes can create a hazard to the health of its occupants.

The Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 were laid before Parliament in June 2025, resulting in Awaab's Law becoming law from 27 October 2025.
Inadequate use of heating and/or ventilation can increase the risk of Damp, Mould & Condensation.

Management Summary

1.0 Purpose

1.1 To provide a further update to Board of the activity undertaken across Wolverhampton Homes to mitigate the risks associated with Damp, Mould and Condensation in the homes under its management.

2.0 Background

2.1 In October 2021, the Housing Ombudsman issued their report 'Spotlight on: Damp and mould. It's not lifestyle'. https://www.housing-ombudsman.org.uk/wp-content/uploads/2021/10/Spotlight-report-Damp-and-mould-final.pdf

This included numerous recommendations for the sector.

- 2.2 On 15 November 2022, a Coroner's report ruled that 2-year-old Awaab Ishak died after prolonged exposure to damp and mould at his family's home in Rochdale. The coroner also issued a Regulation 28 Report to the Secretary of State for Levelling up Housing & Communities and the Secretary of State for Health on 16 November 2022.
- 2.3 The joint Wolverhampton Homes and City Council Damp, Mould and Condensation Working Group, formed in early 2022, is now the standing 'Healthy Homes Committee' that continues to meet typically on a 2 monthly cycle. This committee includes colleagues from WH and the Council.
- 2.4 Wolverhampton Homes, along with Council colleagues, has continued to target reports of damp, mould or condensation from customers and has worked with its partners to develop predictive data analytics to proactively identify 'at risk' homes.
- 2.5 Regular activity and performance updates are presented to Board and the City Council.
- 2.6 A new dedicated DMC and Disrepair Team was formed in April 2024, led by an experienced repairs manager. The new focussed team has led to a number of service and performance improvements and are overseeing our implementation and compliance with Awaab's Law.

3.0 Damp, Mould and Condensation (DMC) Service Requests

- 3.1 Since 16 November 2022, the housing sector, including WH, has experienced a significant increase in DMC related service requests from customers. This is believed to be linked to increased awareness of the health effects of mould in their homes, colder winter temperatures and more customers struggling to heat their homes due to the increased cost of living and energy. WH has also been proactively canvassing customers to report any concerns or instances of DMC since the Autumn of 2022.
- 3.2 From April 2024 to end of March 2025, WH received 4,828 DMC related service requests or where issues had been identified by the company, for example through routine servicing visits, via See-It-Report-It or stock condition surveys. 1,335 were identified from April 2025 to end of August 2025.
- 3.3 WH continues to deliver the stock condition survey (SCS) programme on behalf of the Council. As at August 2025, there has been 5,560 surveys completed to the new standard, including HHSRS assessments (excluding those undertaken to Voids, Mutual Exchanges and new build homes). The Council has recently increased funding to enable WH to accelerate the programme to complete all stock condition surveys, subject to access, by March 2027. The incumbent consultancy has increased resourcing on the contract from September 2025, and WH is procuring an additional provider, that will commence during Q3 to ensure completion by March 2027. Additional temporary staffing resources have also been identified to support the programme management and our data quality assurances processes.
- 3.4 WH Board has previously confirmed their agreement to the company to commit to visit all homes who have reported any scale of DMC issue or concern. In person home inspections have identified a very high proportion of very minor mould being present. This is typically around windows, bathroom seals, grouting etc. and can often be removed with household proprietary cleaners, as part of the tenant's routine responsibilities.
- 3.5 WH is continuing to raise works orders for all mould treatment and property related cleaning and remedial works. The average cost of resolving any immediate mould hazards is in the region of £150. Additional improvement works, to reduce the risk of DMC recurring, e.g. plastering, targeted insulation, upgrading of ventilation / fans, is currently, on average, circa £650 per property, but can be significantly higher for certain archetypes.
- 3.6 To resource DMC related service requests and robustly mitigate any risks for occupants, WH has continued to allocate a range of specialist staffing and contractor resources to ensure reaction is delivered in a timely manner to the increasing service requests and complete any arising works as quickly as possible following the initial risk assessment. This has included response repairs teams being supported by colleagues from across the company, use of overtime and recruitment of additional trades colleagues, including painters.

4.0 Performance Management

4.1 Customer reports have been consistently high during the winter months. All reports of DMC are targeted to be inspected within 14 calendar days of being reported, subject to access:

Overall inspection performance for:

- 2023 / 2024 was 77.9% completed within 14 calendar days and 67.7% of DMC related works orders completed within target.
- **2024** / **2025** was 72.2% completed within 14 calendar days and 77.7% of DMC related works orders completed within target.
- 2025 / 2026 (April to August) is 96.9% within 14 calendar days (August 99.4%) and 76.76% of DMC related works orders (August 97.9%) completed within target.
- 4.2 Work In Progress (demand) continues to be managed by the specialist DMC team, with all pending '10 Day' remedial works and '90 day' improvement works currently within target timescales.
- 4.3 Our trained Healthy Homes Advisors continue to support customers in undertaking basic cleaning and providing advice and guidance regarding heating, ventilation and condensation control. Where remedial works or specialist treatment is required, these activities are undertaken by the in-house trades team or external contractors.

5.0 Proactive Risk Analysis and Investment

- 5.1 To keep customers safe, the company moved to a risk-based approach in April 2023. This utilises internal and external resources more effectively and ensures higher risk homes receive swifter intervention.
- 5.2 Cumulatively from April 2023, less than 2% of homes were assessed as being a Category 1. This has decreased from 3% during 2023 2024, to 1% during 2024 2025, with none yet identified from April 2025. These very low rates are also comparable to the findings of our rolling stock condition survey programme.
- 5.3 Approximately 22% of customer or officer originated service requests were rated as amber, i.e. a moderate mould risk, with around 76% being low risk, with only minor areas of superficial mould being visible.
- In 2024, the Healthy Homes Committee developed the DMC Management Plan. This has recently been updated to reflect the new requirements, based on the current draft Awaab's Law government guidance (see Appendix 1). The plan details our approach and sets out our risk assessment protocols, to ensure a systematic and robust approach to hazards and risk management.
- 5.5 Three full time 'Healthy Homes Advisors' (HHA) were appointed in May 2023 and continue providing first line person centred support for customers when they undertake visits to customers' homes to investigate concerns of DMC. This team investigates the root causes of damp or condensation, identify basic remedial actions, undertake small

- areas of mould treatment, and provide humidity management advice. Our risk-based methodology ensures a consistent approach to their findings, with access to technical surveyors or external specialists available to them as required.
- 5.6 Three new painters were appointed in January 2024 with one additional new painter recruited in September 2025. These colleagues work very closely with the HHA's and other inspectors, with any urgent mould treatment works often being completed the same day as the initial visit.
- 5.7 A revision to the strategic investment programme, that underpins the Council's 30-year HRA Business Plan, was approved by Cabinet in January 2025. This sets out the investment priorities and timescales for further improvements to the Council's housing stock by making them safer, maintaining decency and being more energy efficient. This included the acceleration of work to improve thermal performance and ventilation to the Vauxhall, Boscobel and Chetton Green high-rise estates.
- 5.8 A retrofit project has focused £29.7million of improvements to 503 non-traditionally constructed and energy inefficient homes. These specifications have been carefully designed to PAS2035, to ensure that after the retrofit works have been completed and environments are created that eliminate the risk of a build-up of excessive moisture. This diminishes any future DMC risks. This project also includes the deployment of remote in-home environmental monitoring, with data being reviewed and intervention alerts being actioned by the Energy and Climate Change team.
- 5.9 To enhance the Council's 'data driven decision making' predictive data analytics, along with detailed assessments of our stock condition data, is used to inform planned improvements to customers' homes, including potential retrofit programmes. These programmes will improve housing quality and safety and reduce the financial burden on response repair budgets.

6.0 Communication Campaigns

- Regular and effective communication with customers is key in minimising the instances and effects of DMC, maintaining healthy homes and ensuring wider home safety, i.e. fire and security. The company uses a range of targeted and general media tools, including emails, leaflets, newsletters and social media to promote healthy homes and provide safety advice, including DMC, window and fire safety.
- 6.2 The Communications Team are standing members of the Healthy Homes Committee, and a rolling communication plan is in place. This reflects the changes in the seasons and provides a range of helpful advice and guidance to customers to minimise the risks of DMC along with corrective actions that may be required.
- 6.3 WH continues to provide money matters and home energy advice and signpost customers to a range of financial support services.
- 6.4 WH regularly informs customers how to report repairs or make complaints and encourages customers to contact us rather than using external claims management companies or responding to cold calling from potentially exploitative organisations.

7.0 Disrepair Claims (Section 11's)

- 7.1 WH continues a strong working relationship with the Council's Legal Team with regular liaison meetings being undertaken to review defence approaches and resource levels. A dedicated DMC and Disrepair Team was formed in April 2024, and the Legal Team now regularly work alongside them at our Tarmac Road Office, to review ways of working and undertake case management.
- 7.2 An effective and efficient response repairs service is key to ensuring customer safety and minimising disrepair claims. The number of claims received by the Council continues to fall and remains comparatively low to similar sized providers. Claims summary is as follows;
 - **2023 2024** 230 from 261 the previous financial year.
 - **2024 2025** 178 from 230 the previous financial year.
 - **2024 2025** to end August, 74 claims received to date.
- 7.3 To reduce DMC related risks, Legal Services triage every Letter of Claim and where there is any reference to DMC or leaks, this is brought to the immediate attention of the repairs team at WH. Subsequently, an inspection is carried out within 10 working days.
- 7.4 To reduce access issues, as reflected in the new Access to Homes Policy, Legal Services also now inform the tenant's solicitor that where an allegation of DMC is made, it is their policy to inspect the property within 10 working days. In the event of any remedial works being required, they will be advised of the scope of works to be undertaken and anticipated start and completion dates.
- 7.5 Through the collaborative approach with the Council's Legal Team and continuous repairs process improvements, the Council is typically repudiating circa 84% of claims. Where these cannot be satisfactorily defended, compensation costs associated with disrepair claims are approximately £962 per claim. Typical legal / defence costs are currently averaging circa £5,400 per claim. The current average works cost is typically less than £1,500.

8.0 Awaab's Law

- 8.1 In January 2024, the Secretary of State for Levelling Up, Housing and Communities commenced an eight-week consultation for a proposed 'Awaab's Law'. WH responded to the formal consultation and has provided supplementary information to DLUHC and the National Federation of ALMO's.
- 8.2 Draft guidance relating to the implementation of Awaab's Law, from 27 October 2025, was issued in June 2025. <u>Awaab's Law: Draft guidance for social landlords GOV.UK</u>
- 8.3 From previous preparatory work undertaken by the Healthy Homes Committee and specialist DMC team, Board should be assured WH is in a strong position to comply with Awaab's Law.

- 8.4 The DMC Management Plan (see Appendix 1) has been updated based on the latest draft guidance of Awaab's Law and the introduction of new working practices, including improvements to our housing system via NEC Housing/mobile working. This management plan will be regularly updated to reflect any further developments or arising best practice. The DMC risk assessment protocols have also been updated to consistently assess risk, based on customer vulnerabilities.
- 8.5 A team of four new DMC Customer Service Advisor Specialists have been recruited for triaging all future reports of DMC. This will help streamline the service provided whilst also reducing the need to visit all properties following the initial reporting of a DMC issue. These advisors form part of our Customer Contact and Access team, and will be co-located alongside the DMC Team, where enhanced technical support and quality control can be provided. Specific training and awareness will be provided to all CSAs in order to provide contingency during annual leave or absence.
- 8.6 Remote video triaging is also shortly going live. This will provide some efficiencies, as it is not necessary for officer to attend every property to commence works. This will speed up the overall process of treating DMC abating potential risks sooner, as the scope of remedial works can often be identified at the initial point of contact (see Appendix 2).
- 8.7 Following the company wide DMC training programme undertaken in 2023, staff training courses are again being reviewed in relation to the requirements of Awaab's Law and DMC. to ensure existing and new members of staff continue to receive the appropriate continuous professional development.
- 8.8 The company will also review its Repairs and Maintenance Policy in the New Year, to ensure ongoing compliance. Any revisions will be subject to customer consultation and further Board approval.

9.0 Financial and value for money implications

9.1 Existing budget management arrangements will continue to closely monitor the financial liabilities arising from DMC related service requests and support provided to customers.

10.0 Legal and regulatory implications

- 10.1 This ongoing activity contributes to the company fulfilling its legal obligations under the Health and Safety at Work etc. Act 1974 and a wide range legislation related to the maintenance of the housing assets under its control.
- 10.2 This report supports the company's compliance with a wide range of legislation, related to the maintenance of the housing assets under its control.

11.0 Human resources implications

11.1 Some colleagues may require additional or ongoing training to meet the requirements of the emerging legislation. Any significant changes to job roles, will require Job Descriptions to be reviewed under existing People Deal arrangements.

12.0 Health and safety implications

12.1 This report underpins Wolverhampton Homes commitment to the health, safety and wellbeing of its customers. It is the company's aim to exceed, where possible, the minimum health and safety legislation and adopt best practice.

13.0 Equalities implications

13.1 Ongoing monitoring of customer data relating to service requests or higher risk properties will continue to be monitored to ensure there are no direct or indirect adverse effects towards any Equality Groups. If any are identified, corrective action will be undertaken and reported to Communities and Service Delivery Committee.

14.0 Impact on the environment and community

14.1 No new significant environmental or community impacts are anticipated from this report.

15.0 Long term consequences for the company

15.1 Continuing to adopt effective and proactive management systems will balance customers' priorities, within available repairs and maintenance budgets, and ensures compliance with relevant regulatory standards.

16.0 Impact on business relationships with suppliers, customers and others

16.1 Ongoing demands on our supply chain will continue to be managed through existing contract administration arrangements.

17.0 Impact on Wolverhampton Homes' Management System

17.1 There are no direct Wolverhampton Homes' Management System implications arising from this report.

18.0 List of Appendices

- 18.1 Appendix 1 DMC Management Plan
- 18.2 Appendix 2 Remote Video Assistance

Damp, Mould, & Condensation Management Plan - Standard Operating Procedure

2025



Monitoring and review

Document owner	Approved by	Authorised by	Effective date	Review date
Andrew Nicholls	Neil Causer	Healthy Homes Committee	2025	2026
Repairs Manager	Head of Housing Maintenance			

Document History

Version	Summary of changes	Document Status	Date
V1.0	New Management Plan and Standard Operating Procedure in line with Awaab's Law		

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1.0 Purpose

This Management Plan & Standard Operating Procedure (SOP) outlines Wolverhampton Homes' approach to identifying, triaging, resolving, and preventing damp, mould, or condensation (DMC) in managed social housing properties.

This document underpins the Repairs and Maintenance Policy by ensuring that Wolverhampton Homes' response to DMC is risk-based and systematic, enabling the organisation to demonstrate that all reasonable steps are taken to minimise the impact of DMC.

2.0 Scope

Wolverhampton Homes is an Arms Length Management Organisation acting on behalf of the City of Wolverhampton Council ('the Landlord') and is responsible for managing approximately 21,000 properties. This stock consists of flats, houses, garages, offices, and other non-domestic assets.

This Management Plan and SOP applies to all properties under Wolverhampton Homes' direct management. It does not apply to properties managed by other Managing Agents within the Landlord's control.

Wolverhampton Homes is not responsible for damp, mould, or condensation arising within Leasehold or privately rented properties, unless damp is caused by a leak from a building element retained as the Landlord's responsibility.

- Any rectification works to the building may be chargeable to the Leaseholder.
- Any decoration required following rectification works remains the responsibility of the Leaseholder. Leaseholders are encouraged to purchase Contents Insurance to insure against any losses that they may incur.

3.0 Regulatory Standards

This Management Plan & SOP compliments Wolverhampton Homes regulatory obligations and aligns with the Consumer Standards introduced by the Regulator of Social Housing. It aligns with the following standards:

- Safety and Quality Standard requires providers to understand the condition of their homes through accurate data and assessments while providing an effective repairs and maintenance service. Providers must also meet all statutory health and safety requirements.
- Transparency, Influence and Accountability Standard requires providers to treat tenants with fairness and respect while providing clear and accessible information about decisions. Providers must enable tenants to understand, influence, and hold the organisation accountable.

4.0 Legal Framework

This Management Plan & SOP provides a framework to ensure compliance with Wolverhampton Homes' legal obligations. It aligns with the following key legislation and guidance:

- Awaab's Law 2025 Awaab's Law will come into force for the social rented sector from 27 October 2025. From this point social landlords will have to address all emergency hazards and all damp and mould hazards that present a significant risk of harm to tenants to fixed timeframes.
- Children Act 2004, Section 11 sets out the duty to have regard to the need to safeguard and promote the welfare of children.
- Defective Premises Act 1972 sets out the duty of care to carry out repairs, ensuring that all individuals who could be affected by relevant defects are reasonably safe from personal injury or damage to their property resulting from defects.
- Environmental Protection Act 1990 states that when the condition of a property causes someone to become ill or a sick person to deteriorate, the courts may be satisfied that it is prejudicial to health. DMC may be defects that are considered prejudicial to health.
- Homes (Fitness for Human Habitation) Act 2018 includes a requirement for residential rented accommodation is provided and maintained in a state of fitness for human habitation.
- Housing Act 2004, Housing Health and Safety Rating System (HHSRS) –
 requires the local authority to take into account the impact of health and safety
 hazards in housing on vulnerable occupants, including children. This sets out the
 system used by local authorities to assess the condition of its stock and to ensure
 its housing meets the Decent Homes Standard.
- Landlord and Tenant Act 1985, Section 11 requires the landlord to keep the property in reasonable repair.

5.0 Definitions

The following terms and abbreviations represent commonly used terminology and are used throughout this Management Plan & SOP:

Condensation	Water vapour that has condensed into droplets and has formed on surfaces.
Damp	The presence of excess moisture in a building.
Emergency Hazard	A hazard that poses immediate risk to health or safety within a property.

Humidity	Concentration of water vapour in the air.
Material Change	A change in severity of the reported hazard or a change to the tenant's vulnerabilities.
Mould	Fungal growth that occurs in areas affected by damp or significant condensation. Black mould presents the biggest hazard to health.
NEC Housing (NEC)	Proprietary Housing Management System.
NEC Document Management (NEC DM)	Electronic Document Management and Storage System.
Pre-Inspection	Inspection carried out prior to any works being undertaken.
Post-Inspection	Inspection carried out after works have been undertaken.
Work Order Reference	A unique reference number relating to the individual repair or individual job.
Written Summary of Inspection Findings	A summary document provided to the tenant confirming an inspection has taken place, a detailed outcome of the inspection, and

6.0 Competency, Responsibilities, and Roles

Role	Competency	Responsibility Summary
Repairs Manager (RM)	HNC in Building Studies or equivalent	Supervision of DMC Management Plan and SOP.
	Wolverhampton Homes E- learning	Competent investigator with the skills and experience to determine hazards, their cause, and required actions.
Property Supervisor (PS)	HNC in Building Studies or equivalent Wolverhampton Homes E-	Supervision of Trade Operatives working within DMC Team.
	learning	Supervision of Healthy Homes Advisors working within DMC Team.

		Competent investigator with the skills and experience to determine hazards, their cause, and required actions.
Health Homes Advisor (HHA)	HNC in Building Studies or equivalent Wolverhampton Homes E- learning	Competent investigator with the skills and experience to determine hazards, their cause, and required actions.
Contract Monitoring Assistant (CMA)	Wolverhampton Homes E- learning	Assist in the feasibility and development of projects, responsible for liaison with individual customers, residents and contractors.
Customer Service Advisor - Specialist (CSAS)	Wolverhampton Homes E- learning	Triaging at first point of contact.

7.0 Understanding Damp, Mould, and Condensation

DMC in the home can pose serious health risks and prolonged exposure can lead to respiratory illness or long-term health complications.

While anyone can be affected, individuals with pre-existing health conditions, weakened immune systems, children, and older adults are especially vulnerable to the adverse effects of damp and mould

7.1 Rising Damp

Rising damp occurs when moisture moves up from the ground through the structure of the building through capillary action. Rising damp can occur due to a failure or absence of a damp-proof course or membrane, however, is often misdiagnosed.

7.2 Penetrative Damp

Penetrating damp occurs when water enters a property through defects in the building's structure or components. Common causes include faulty design, damaged roofs, windows or doors, defective drainage systems, and leaking internal pipework. This type of damp can lead to structural damage, rot, and deterioration of internal finishes.

7.3 Traumatic Damp

Traumatic damp refers to sudden and severe water ingress, typically caused by internal failures such as burst pipes, leaking tanks, or overflowing fixtures, as well as external flooding. It presents as visibly wet areas, often accompanied by discolouration, musty

odours, and rapid deterioration of internal finishes. Unlike other forms of damp, traumatic damp is immediate and unrelated to weather conditions.

7.4 Mould

Mould is a type of fungus that thrives in damp and poorly ventilated environments. It typically develops on moist surfaces and can produce allergens, irritants, and potentially toxic substances that pose significant health risks, particularly to the respiratory system. In addition to its health impacts, mould can cause damage to building materials and finishes.

7.5 Condensation Damp

Condensation damp is the most common form of damp and occurs when warm, moistureladen air comes into contact with cooler surfaces, causing water vapour to condense into liquid. This typically affects areas such as windows, corners, and cold spots behind furniture. Condensation is often caused by inadequate ventilation, heating, or insulation.

8.0 Standard Operating Procedure

8.1 Notification

Wolverhampton Homes offers several reporting channels that customers or colleagues can report potential DMC hazards:

- Tenant Notification Tenants, or their proxy, can report DMC directly to the Customer Contact and Access Team via telephone, email, in-writing, or using the 'My Account' mobile app.
- Trade Operatives or Colleagues working on Site All Wolverhampton Homes employees are trained to 'See it, Report It' ('SIRI'). This reporting process, used for all concerns relating to a property or person, generates a referral to the dedicated SIRI team, who will triage the issue and refer it to the appropriate team for action.
- Customer Resolution Team Where a customer submits a formal complaint relating to DMC, the complaint will be referred to the DMC team for investigation.
- Stock Condition Surveys Hazards identified via these surveys will be rectified as per the Repairs and Maintenance policy, unless related to DMC.
- Contractors All Contractors are required to align with the 'SIRI' reporting practices and notify Wolverhampton Homes if they identify any concerns with a person or property.
- External Sources Wolverhampton Homes will consider all reports made by external organisations or individuals.

8.2 Triaging

Wolverhampton Homes will carefully triage all reports of DMC to make an initial determination as to whether a potential hazard may exist under Awaab's Law.

This initial determination will be carried out by a Specialist Customer Service Advisor who will assess each case individually using key questions designed to identify key risk factors, assess the severity of the issue, and capture all relevant details. All responses will be recorded and stored within NEC Document Manager.

If the initial determination identifies an emergency hazard but is not DMC related, an emergency repair will be scheduled and attended to within 24 hours. This will be prioritised as FE (Fix it Emergency) during office hours or OOH (Fix it, Out of Hours) outside of office hours.

8.3 Scheduling the Investigation

After a potential DMC hazard is initially triaged, a standard investigation ('pre-inspection') is recorded on NEC Housing and assigned to the Investigating Officer's diary under the Fix it Damp & Mould (FDM) priority code. This action automatically generates a target attendance date for Wolverhampton Homes to attend within 10 working days.

For homes which may be affected by a significant DMC hazard, the Specialist Customer Service Advisor Handler will offer the tenant the earliest available appointment within the 10 working days target. This appointment may be offered as an in-person visit or a remote inspection via video call. The earliest available appointment that is offered will be recorded.

If the tenant is unable to provide access at the earliest offered appointment, then an alternative suitable appointment will be made with the tenant within the 10 working days target.

If the tenant is still unable to provide access within 10 working days, Wolverhampton Homes will reasonably endeavour to overcome any barriers. This may include arranging a specific time for the appointment or arranging access with a family member or social worker. In exceptional circumstances, a weekend appointment or an appointment outside of office hours may be offered.

Wolverhampton Homes will evidence all attempts to agree an appointment date with the tenant.

If Wolverhampton Homes initially determines that a home is affected by an emergency DMC hazard, then emergency action will be taken within 24 hours to both investigate and make safe the property. In these cases, the Specialist Customer Service Advisor will arrange a same-day pre-inspection and a same-day repair to make the property safe.

Once an appointment is scheduled, NEC Housing will send a series of automated text messages to the tenant to confirm the appointment and help minimise unsuccessful access attempts. These messages are automatically recorded against the inspection on NEC Housing and include:

- A booking confirmation on the day the appointment is scheduled.
- A reminder three days prior to the appointment.
- A final reminder on the day of the appointment.

Tenants are asked to contact Wolverhampton Homes to rearrange the appointment if it is no longer suitable.

If Wolverhampton Homes has been made aware of a potentially significant DMC hazard but cannot make successful contact with the tenant, a letter will be sent to the tenant confirming an appointment date, with reasonable notice.

8.4 Material Change prior to Investigation

A material change may arise in the nature of the reported hazard or the tenants' vulnerabilities which may require further triaging before the scheduled investigation takes place.

In these cases, Wolverhampton Homes will assess the material change alongside the original report. If the potential hazard was initially triaged to be a significant hazard but the material change means it needs to be treated as an emergency hazard, the investigation will be escalated in priority and completed within 24 hours.

8.5 Investigation

Wolverhampton Homes will complete the in-person or remote investigation into a potentially significant hazard within 10 working days of receiving notification that a hazard may exist under Awaab's Law.

If a tenant requests an in-person inspection following a remote investigation, Wolverhampton Homes will carry out the in-person investigation within 10 working days of the request.

The Investigating Officer carrying out the pre-inspection will have the competency (as outlined in 6.0 Competency, Responsibilities, and Roles) to determine whether a property is affected by a hazard. They will evaluate the severity of any DMC hazards using the Risk-Vulnerability Assessment Matrix (Appendix B).

The resulting severity score will determine the appropriate repair category and timescale for completing any required safety works. This score will be recorded on the completed pre-inspection and stored in NEC Housing:

Severity Score from Risk- Vulnerability Matrix	Category	Safety Works Timescale
DMCCAT0	No Mould	No Treatment Required
DMCCAT1	No Significant Hazard	20 Working Days
DMCCAT2	Significant Hazard	5 Working Days

DMCCAT3	Emergency Hazard	1 Working Day

8.6 Written Summary

A Written Summary of Inspection Findings (Appendix C) will be issued to the tenant at the conclusion of the investigation. This document outlines the findings of the Investigating Officer and includes:

- Any significant or emergency hazards identified.
- Any actions that are required and a target timeframe for completion.
- Any decisions that have resulted in no action being taken and the reasons why.
- Information on how to contact Wolverhampton Homes further.

The summary document will be provided to the tenant electronically or in-person no later than 3 working days after the conclusion of the investigation. A posted copy may be issued to the tenant so long as it's sent via first-class post within the same 3 working days.

A Written Summary of Inspection Findings document may not be required if all safety and preventative works are completed prior to issuing out the document. In these cases, Wolverhampton Homes may offer a confirmation summary document confirming no further works are required.

A digital copy of the summary document will be stored on NEC Document Manager.

8.7 Making the Property Safe

All safety works will be raised in NEC Housing as either a single Works Order or multiple orders, depending on the scope of work and availability of Trade Operatives or External Contractors.

8.7.1 from Emergency Hazards

If an investigation identifies an emergency hazard, Wolverhampton Homes will carry out all necessary safety works within 24 hours of the investigation's conclusion. These works will be logged and scheduled in NEC Housing with the priority 'EDM' (Emergency Damp & Mould).

8.7.2 from Significant Hazards

Where an investigation has identified a significant hazard, Wolverhampton Homes will complete all required safety works within 5 working days of the conclusion of the investigation. These works will be raised on to NEC Housing and assigned to the PDM (Priority Damp & Mould) priority.

8.7.3 From Non-Significant Hazards

If an investigation identifies no significant or emergency hazards within the property, Wolverhampton Homes will still complete any remedial works for DMC within 20 working days. These works will be scheduled into NEC Housing under the 'FDM' (Fix it Damp & Mould) priority.

8.8 Offering Alternative Accommodation

Where Wolverhampton Homes is granted access to the property but is unable to commence or complete the required safety works within the prescribed timeframes under Awaab's Law, suitable alternative accommodation will be provided to the tenant. This offer of alternative accommodation will be made to the tenant without delay.

If the tenant declines the offer of alternative accommodation, Wolverhampton Homes will record this decision in NEC Housing, and the tenant will be asked to confirm this decision and reasons in writing. This written confirmation will be stored in NEC DM.

Where the tenant is unable or unwilling to provide written confirmation, Wolverhampton Homes will document this in NEC Housing, to ensure that the refusal is formally recorded.

The provision of alternative accommodation will be made in accordance with the City of Wolverhampton Council's Decant Policy.

8.9 Preventative Works

Further preventative measures or works may be required following the completion of any safety works. Within 5 working days of the conclusion of the investigation, Wolverhampton Homes will begin or take steps to begin the required preventative works.

Preventative works will be completed as quickly as possible and no later than 12 weeks from the conclusion of the investigation. These works will be raised on NEC Housing as ADM (Associated Damp & Mould) priority.

8.10 Material Changes after Investigation Concludes

A material change that occurs after the investigation has concluded will be examined to determine if a new standard investigation is required. If a new investigation is required, this will occur within 10 working days of Wolverhampton Homes being notified of the material change.

8.11 Post-Work Inspections

Wolverhampton Homes will complete post-inspections to ensure that preventative works carried out have resolved the underlying issue. These inspections may be carried out inperson, by telephone, or via video calling.

8.11.1 Work Quality Check

Post-inspections will be prioritised for properties where an Emergency (DMCCAT3) hazard was identified. A random sample of properties with Significant (DMCCAT2) hazards will also be selected for inspection.

Risk-Vulnerability Matrix Score	% In-person Inspection	% Telephone or Video Inspection
DMCCAT0	Upon Request	Upon Request
DMCCAT1	Upon Request	Upon Request
DMCCAT2	10% Offered	10% Offered
DMCCAT3	100% Offered	Upon Request

Post-inspections will be scheduled no earlier than 6 weeks following the completion of all preventative works.

A weekly automated report generated from NEC Housing will identify all properties requiring post-inspection. This report will:

- Randomly select completed DMCCAT2 cases with no outstanding works.
- Contain all completed DMCCAT3 cases with no outstanding works.

Where Wolverhampton Homes has offered a post-inspection and the tenant has declined, the post-inspection will be cancelled on NEC Housing, with the reason code 'Post-Insp Declined', and a comment confirming why it was declined.

Where Wolverhampton Homes is prompted to offer a post-inspection but has not been able to make contact and agree a suitable appointment, a letter will be sent to the tenant confirming an appointment with reasonable notice.

8.11.2 at Tenant's Request

A tenant may request a post-inspection following the completion of any safety or preventative works.

Wolverhampton Homes will initially triage these requests to determine if remedial works were completed unsatisfactorily or whether a new reportable hazard under Awaab's Law might exist. Where a new reportable hazard exists, a new standard investigation will commence in line with 8.5 Investigation procedures.

8.12 Access to the Property

Where Wolverhampton Homes is required to access a property to carry out investigations, safety works, or preventative measures, any instances of non-access will be managed in accordance with the Access Framework outlined in the Access to Homes Policy.

All actions taken under this framework will be documented in NEC Housing and NEC DM.

9.0 Supplementary Procedures

This section outlines specific procedures that apply to particular property types or legal contexts where tailored approaches are required.

9.1 Void Property Management

Wolverhampton Homes will ensure that all properties let to tenants are free from all hazards, including DMC, and that all properties are handed over to the lettable standard, in line with the Repairs & Maintenance Policy.

Void Properties are subject to a structured inspection and repair process:

- A pre-inspection is carried out to identify any hazards or required repairs, including those relating to DMC.
- Remedial works are undertaken to eliminate identified risks and bring the property up to the lettable standard.
- A post-inspection is completed prior to handover to confirm that all necessary works have been completed and that no outstanding hazards remain.

Once a property is tenanted, any reports of DMC are subject to this Management Plan and SOP.

9.2 New Build Properties under Warranty

Wolverhampton Homes may manage newly constructed properties that remain under a builder's warranty, which covers defects and repairs. In such cases, Wolverhampton Homes will undertake initial investigations in accordance with this Management Plan and SOP. Where appropriate, responsibility for remedial works may be referred to the builder under the terms of the warranty.

If Wolverhampton Homes has reason to believe, or is aware, that the builder is unable or unwilling to complete the necessary works to the required standard or prescribed timeframes, Wolverhampton Homes will complete the required safety works.

Wolverhampton Homes remains accountable for ensuring all required works are completed within the statutory frameworks and standards set within this Management Plan and SOP.

10.0 Key Performance Indicators

Wolverhampton Homes will report monthly, quarterly, and yearly on the below Key Performance Indicators:

PI Code	Performance Indicators
P-DMC1a	Total % of damp, condensation and /or mould related service requests inspected within target timescale of '10 working days' (14 Calendar Days).

P-DMC1b	Total % of damp, condensation and /or mould related works orders 'completed' within target timescale of '20 working days' (28 Calendar Days).
P-DMC1c	Total % of damp, mould, or condensation related work orders 'completed' within target timescale of '5 working days' (7 calendar days).
P-DMC1d	Total % of damp, mould, or condensation related work orders 'completed' within target timescale of '24 hours' (1 calendar day).
P-DMC1e	Total % of damp, mould, or condensation related work orders 'completed' within target timescale of 12 Weeks.

11.0 Resilience Testing

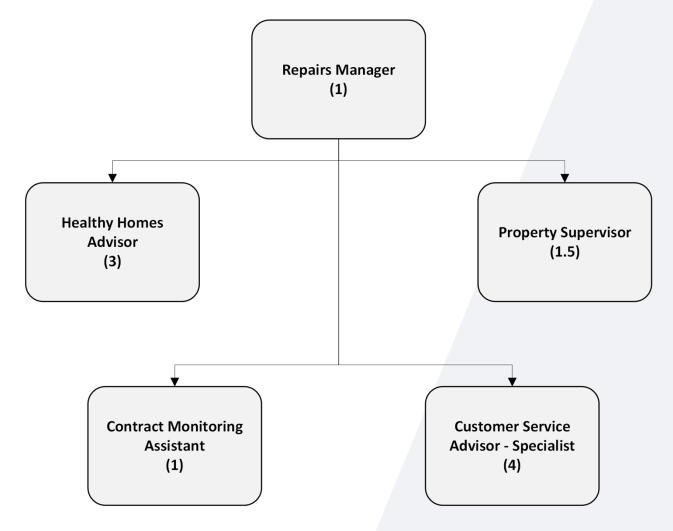
This Management Plan and SOP, along with the associated processes, are subject to regular auditing to ensure Wolverhampton Homes maintains a robust and effective response to all reports of DMC.

Audits may include, but are not limited to, the following activities:

- Comprehensive case file reviews to assess the end-to-end handling of DMC reports, verifying that all procedural steps have been followed and appropriately documented.
- Evaluation of triage call recordings to ensure consistency, accuracy, and adherence to initial assessment protocols.
- Documentation integrity testing, confirming that case records are complete, well-maintained, and capable of supporting Wolverhampton Homes in the event of legal scrutiny or formal challenge.

12.0 Appendices

A Team Organogram



	Combined Mould Surface Area: More than 1 Surface of an Internal Door Face	DMCCAT2 Significant Hazard	DMCCAT3 Emergency Hazard	DMCCAT3 Emergency Hazard Consider Decant	DMCCAT3 Emergency Hazard Consider Decant
sk	Combined Mould Surface Area: Between 0.5 and 1 Surface of an Internal Door Face	DMCCAT2 Significant Hazard	DMCCAT2 Significant Hazard	DMCCAT3 Emergency Hazard	DMCCAT3 Emergency Hazard Consider Decant
Mould Severity or Risk	Combined Mould Surface Area: Less than 0.5 Surface of an Internal Door Face	DMCCAT1 No Sig. Hazard	DMCCAT1 No Sig. Hazard	DMCCAT2 Significant Hazard	DMCCAT3 Emergency Hazard
Mon	Mould spotting around window reveals, frames, silicon, corners of room or behind furniture.	DMCCAT1 No Sig. Hazard	DMCCAT1 No Sig. Hazard	DMCCAT2 Significant Hazard	DMCCAT2 Significant Hazard
	No Mould identified within property	DMCCAT0 No Hazards	DMCCAT0 No Hazards	DMCCAT0 No Hazards	DMCCAT0 No Hazards
Risk-Vulerability Matrix		No Vulnerabilities or Health Concerns	Minor Health Concerns	Immuno Compromised Individuals living in Property Young Children or Infants Iiving in Property	Individuals with Severe Respiratory Disease or Severely Weakened Immune Systems New Born Babies living in Property
		Tenant Vulnerability			

C Written Summary of Inspection Findings

Written Summary of Inspection Findings

This is your written summary of inspection findings to confirm that Wolverhampton Homes has completed an inspection at your property. Any repairs or further investigations required from this inspection will be raised within 7 days.



Reference:	on, Findings, and Outcome:	Method of		
10101011001		Inspection:		
Address:		Postcode:		
Inspection Date:		Time:		
Reported				
ssue(s):				
rea or Location	Findings of inspection, detailing any:	Actions Wolv	verhampton Homes will take, including any:	Repair
inspected:	 Risks or hazards to the resident 	• Tem	porary repairs to make the property safe	Timescale:
	 Risks or hazards to the property 		nanent repairs to rectify the problem	(working da
		• Furt	her investigations or surveys	

Area / Location inspected:	Findings of inspection:	Reason why works are not agreed or required:	
art C - Wolverha	ampton Homes Officer:		
Name:		Job Title:	
art D – Custome	er's Name and Signature:		
Customer's	ortanio una orginataro.	Signature:	
Name:			
OR Proxy's Name		Signature:	
Relationship		organization .	

Contacting Us

View your repairs online or on your mobile phone using our new customer app: My Account.

To find out more about My Account, head over to our website: www.wolverhamptonhomes.org.uk or scan the QR code to the right.

You can contact us by calling 01902 556789.

Alternatively, you can write to us at: Wolverhampton Homes, Alfred Squire Road, Wednesfield, WV11 1XJ.



D DMC Process Map

See document 'Appendix D – DMC Process Map'.





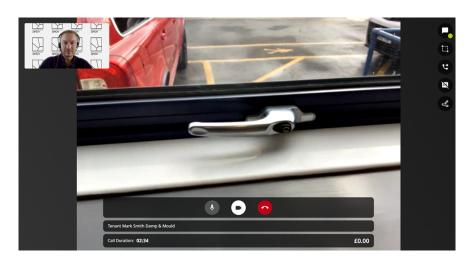
Appendix 2 - Virtual Inspections and Video Triaging

As part of our ongoing commitment to improve services and enhance efficiency, we are introducing new technology to support the identification and inspection of Damp and Mould. This approach makes use of video triaging with the Help Me Fix platform, enabling the company to carry out inspections remotely, provide faster resolutions, and reduce the need for unnecessary property visits.

This technology will help us deliver a more responsive service for tenants, reduce operational costs, and provide clear evidence for decision-making and training.

Benefits of video triaging:

- Reduced costs and time savings Inspections can be carried out virtually, eliminating unnecessary travel for trade operatives and supervisors.
- Convenience for tenants Tenants do not need to wait at home for long appointment slots; issues can be resolved more quickly in a single visit.
- **Improved accessibility** Supports vulnerable tenants who may not want visitors due to health or personal circumstances.
- **Streamlined repair process** Repairs can be scheduled immediately during the video call, avoiding delays or missed follow-ups.
- First Point of Contact resolution Issues outside of our responsibility can be identified and closed remotely, saving resources and avoiding wasted visits.
- **Efficient post-inspections** Completion checks, or hazard resolutions can be confirmed virtually, reducing the need for repeat visits.
- **Recorded evidence** Video calls are saved, providing reliable records for decision-making, legal disputes, and case reviews.
- **Training resource** Recorded videos can be used to train staff in identifying and diagnosing issues.
- **Integrated communication** Secure two-way sharing of files, guides, and photos helps tenants and colleagues exchange key information quickly.
- **Automated outcome reports** Summaries are automatically generated and shared with tenants and admin teams, reducing paperwork and errors.
- **Interactive support** The ability to capture screenshots and draw on-screen in real time helps pinpoint issues clearly during the call.





Board Report

	Agenda Item 6	
WOLVERHAMPTON HOMES	24 September 2025 Compliance update (Big-7) - Quarter 1, 2025 - 2026	
	Open Report	
Status:	For Information	
Author and job title:	Tommy Crowson, Head of Asset Compliance	
Contact No:	07890 902461	
Recommendations:	Board Members are asked to note that:	
Trecommendations.	 high levels of compliance are being achieved with the landlord's main health and safety risks. relevant legislation is being followed, and any risks are being actively managed. 	
Key risks and contentious issues:	Quality and Safety: Compliance activity must be managed robustly, and detailed controls are required to reduce risks to our tenant's, the public, colleagues and contractors and maintain compliance with the Regulator of Social Housing's consumer standards. Reputational: Failure to ensure compliance in these areas could result in prosecution by the Health and Safety Executive, or possible intervention or action by the Regulator of Social Housing or the Building Safety Regulator.	

1.0 Purpose

- 1.1 To provide Board members with an assurance update of the performance of the "Big-7" compliance activities and the position reached at the end of Q1 2025 2026 including the following areas of asset compliance:
 - Asbestos Safety
 - Damp, mould, and condensation prevention / mitigation
 - Electrical Safety
 - Fire Safety
 - Gas Safety
 - Lifting equipment (LOLER)
 - Water hygiene and legionella prevention
- 1.2 To update on the wider areas of compliance outside of the "Big-7".
- 1.3 Asset compliance activities are essential to ensure Wolverhampton Homes (WH) meets its legal duties in these areas and to safeguard our customers. These activities are delivered to all Council-owned social housing stock, including those managed by the Tenant Management Organisations (TMOs), and the Estate Management Boards (EMBs).

2.0 Background

- 2.1 The Regulator of Social Housing, through the Safety and Quality Standard, stipulates that "landlords shall meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes". This duty is supported by the requirements set out within the various acts and regulations that govern a range of activities.
- 2.2 This report identifies the performance on the main health and safety compliance measures (previously known as the "Big-6"), and includes the performance dealing with damp, mould, and condensation issues introduced in April 2023, in preparation for "Awaab's Law" within the Social Housing (Regulation) Act 2023.
- 2.3 This report provides the Board with assurance that the appropriate compliance regimes are in place and are suitably robust to ensure the various health and safety risks are effectively managed.
- 2.4 The delivery of compliance activity continues in a challenging environment, with the introduction of new and revised regulations that are raising standards and increasing demand.
- 2.5 Overall compliance status as at the end of June 2025.

Asbestos safety	The percentage of blocks of flats and garage site that have an up-to-date re-inspection of the asbestos containing materials.	100%
Damp, mould, and condensation	The percentage of DMC inspections completed within the target time.	97.63%
(DMC)	The percentage of DMC work orders completed within the target time.	71.01%
	[Cumulative April to August DMC related works orders completed within target 76.76% (August 97.9%)]	
Electrical safety	The percentage of properties that have a valid safety inspection report for the electrical installation (EICR).	99.95%
	The percentage of non-domestic premises that have a valid safety inspection report for the electrical installation (EICR).	100%
Fire Safety	The percentage of purpose-built	87.77%
	blocks of flats that have an up-to-date fire risk assessment.	(TSM BS02 indicator - 97.6%, as this based on dwellings, not blocks. See Appendix 1)
Gas safety	The percentage of properties with gas appliances that have a valid safety inspection report for the gas installation and gas appliances (LGSR).	99.99%
Lifting equipment (LOLER)	The percentage of passenger lifts that have a valid safety inspection report.	100%
	The percentage of domestic lifting equipment that have a valid safety inspection report.	94.2%
Water hygiene and legionella prevention	The percentage of sites that have an up-to-date risk assessment.	100%

2.6 With the data migration to Cloud 365 (C365), data quality reviews have been undertaken on all areas of building compliance, to ensure the robustness of the baseline data and the accuracy and ongoing reliability of the information used to assure our adherence to

regulatory standards. These reviews involved a thorough examination of the collected data and triangulation of various data sources, such as NEC system data, repair history and inspection reports, to identify any inconsistencies, errors or omissions. In addition to a desktop review, site inspections and spot audits are regularly taking place in some areas to further validate the accuracy of the information gathered from documents and records.

- 2.7 In conjunction with the data quality audit, a review and analysis of compliance processes and procedures has been undertaken to standardise and ensure consistency across all areas to support the implementation of C365.
- 2.8 C365 is now live for Asbestos management across Wolverhampton Homes and the TMO / EMB managed stock. C365 facilitates all employees having access to view the Asbestos Register and any Asbestos Management Surveys held against properties.
- 2.9 To further ensure the integrity of building compliance activity, an external audit of each of Gas, Electrical, Lift Services, Legionella and Asbestos was undertaken during 2024 2025. Independent audits bring an impartial and expert perspective to the data, management processes and day-to-day controls currently in place within the company. The results of an external audit guide any corrective actions needed to ensure that safety and quality standards are not only met but are continuously improved. This provides an additional layer of defence in the context of regulatory compliance. The Council's Internal Audit team also reviewed the overarching compliance arrangements in September 2024 and assessed these to be satisfactory.
- 2.10 The other notable issues with the delivery of compliance activity are detailed in the following sections of this report.

2.10.1 Asbestos safety

The reinspection of Asbestos Containing Materials (ACMs) in accordance with Regulation 4 of the Control of Asbestos Regulations 2012, is undertaken via Bradley Environmental Services (the appointed asbestos surveying specialist). Their performance is noted in the table below:

Category	Due within the month	Completed within the month	Percentage Compliance
Reinspection of ACMs – Apr 2025	99	99	100.00%
Reinspection of ACMs – May 2025	163	163	100.00%
Reinspection of ACMs – Jun 2025	132	132	100.00%
Compliance position at end of the	100%		

With the enhanced focus on regulatory compliance and data quality, the company commissioned a peer review by iON consultancy (a leading independent health, safety, and environmental compliance specialist), to undertake an asbestos assurance review. This review was delivered in two phases, with the initial phase involving a review of the

management arrangements and comparing them to best practice and looking at the migration to C365. This second phase was to ascertain if the development of the procedures and migration of data into an asbestos register had been effectively implemented. This would be tested via interviews with key individuals to establish if practice reflected procedures.

The review identified that the Asset Compliance Team have 'established the assets, developed a register using 'sound' information, identified the bespoke training needs of different types of staff, identified their current risk position and have put a desirable plan in place with supporting procedures that now requires full implementation'.

The review identified that the Domestic Survey strategy was typically 'reactive and not proactive' as Wolverhampton Homes have not previously been required to conduct management surveys of dwellings, as they are outside the scope of Regulation 4 (i.e. non-domestic premises). Their recommendation was for WH to exceed the requirements of Regulation 4 and develop a programme to obtain management surveys of all dwellings.

The recommendation from iON to commission a programme of management surveys of all Council dwellings has been approved by the City of Wolverhampton Council with a request for Wolverhampton Homes to develop this programme. Board can be assured the new programme to carry out Asbestos Management Surveys across all Wolverhampton Homes housing stock has commenced.

The programme has been developed using a risk-based model, taking into account a range of property parameters, including build date, archetype, and number of bedrooms / occupants. Based on these factors, all properties have been categorised into High, Medium, or Low risk. The phased rollout of the programme commenced in August 2025, starting with those properties identified as being higher risk due to the age and / or design.

The Asbestos Management Plan 2025 has been implemented across the business and has been made available on our document management system (WHMS).

2.10.2 Damp, mould, and condensation (DMC) prevention / mitigation

There continues to be challenges to meet the heightened ongoing demand for inspections and remedial work, although the frequency of significant DMC problems being identified remains very low. On average, the number of requests for damp and mould related activities is 90 per week for the period April 2024 to 31 March 2025. This reduced to an average of 62 per week during Q1, with no Category 1 DMC hazards identified during Q1.

Please refer to the DMC Update Board Report for further information regarding Wolverhampton Homes DMC risk management and mitigation.

2.10.3 Electrical safety

Electrical Installation Condition Reports (EICRs) are now being delivered in accordance with best practice (on a 5-yearly cycle). There are 10 dwellings where the inspection and testing of the electrical installation has past the anniversary date and progressing through the no-access procedure. This gives a percentage compliance of 99.95% of dwellings that have had an EICR conducted within their five-year anniversary date.

An improvement plan has been identified and implemented for remedial work following an EICR. Historically, any remedial work categorised as C1 (which means that danger is present / risk of injury), has remedial action completed at the same time as the inspection by the contractor. Any other remedial work is raised on the NEC Housing Management system and issued to the Repairs Team to complete. This approach does create some delay in getting work completed and a logistical issue to identify the follow-on work that completed the outstanding actions.

Since Q3 2023, all Category 2 (C2) remedial work has been completed at the same time as the inspection. The C2 category of defects are not as severe as a C1 but are still potentially dangerous defects. This change has proven to be very beneficial as there is:

- no delay in the completion of these urgent remedial works.
- · electrical safety risks immediately abated.
- less disruption for our customers.
- no issue gaining access to carry out the C2 remedial work (as the contractor is already there).
- an increase in the number of satisfactory certificates being returned.

In June 2025, the Government announced The Electrical Safety Standards in the Private Rented Sector (England) (Amendment) (Extension to the Social Rented Sector) Regulations 2025. These draft regulations are stated to be coming into effect from November 2025 for new tenancies and May 2026 for existing tenancies and will require all landlords to ensure that electrical inspections, testing and electrical repairs are carried out every 5 years. Furthermore:

- A copy of the Electrical Safety Certificate Electrical Installation Condition report (EICR) is to be given to the tenant within 28 days from the inspection date. Or alternatively, at the start of any new tenancy.
- Mandatory PAT testing In-service Inspection and Testing of Electrical Equipment (ISIT) on all landlord provided electrical equipment to be carried out alongside the electrical inspection.
- Landlords are to complete any electrical remedial repair works within 28 days from the inspection date.
- Access Landlords must be able to clearly evidence all correspondence / attempts etc. to or from the tenant to gain access within the specified timescale to carry out the inspection and any repairs.

Wolverhampton Homes has long anticipated these changes and had already introduced a rolling 5-yearly EICR programme. The company already undertakes Portable Appliance Testing (PAT) testing of appliances provided as part of the 'tenancy', with this typically

only applying to Temporary Accommodation. A copy of the EICR is issued at sign-up of a new tenancy.

Wolverhampton Homes has assessed the draft regulations and can assure Board that it is in a strong position to ensure the Council is compliant with these imminent Regulations. An outstanding action is the implementation of the issuance of completed EICR's to existing tenancies from May 2026. There is no known operational concern with this, and the use of the electronic transmission will be encouraged where possible, to reduce administration costs. There is also the exploration of the option of the relevant certification being available to customers via the Engage App with NEC.

2.10.4 Fire Risk Assessments

The introduction of the Regulatory Reform (Fire Safety) Order 2005 required landlords to undertake Fire Risk Assessments (FRAs) of purpose-built blocks of flats with shared escape routes/internal common areas. For many years the compliance performance for FRA delivery has been consistently very good, with 100% of all blocks being assessed on, or shortly before their due date.

The Fire Safety Act 2021 amended the Regulatory Reform (Fire Safety) Order and made it clear that "any building with two or more domestic premises and with a shared common area (internal or external), falls within the scope of the Fire Safety Order."

On 20 January 2025, the Government published new guidance, namely, "a guide to making your small block of flats safe from fire". This guidance advised that FRAs are now required to premises with more than one storey, in which each flat has its own private exit, and within which there are no internal spaces used by more than one household, such as common hallways, landings and stairwells. These types of buildings are commonly referred to as duplex blocks and can look similar to a semi-detached house (but with one flat on the ground floor and another on the first floor). The Council has over 1,100 of these types of blocks.

Using the Government's Fire Risk Assessment Prioritisation Tool to quantify the extent of any latent risk presented by our duplex properties, it was determined that the duplex blocks fall into the 'very low priority (Tier 5)', which is the lowest risk tier within the toolkit.

Following recommendations by the Building Safety Manager on 17 April 2025, the Building Safety Committee agreed to include duplex properties within the scope of the FRA programme. A programme was developed to ensure the FRAs, of duplex-style properties, were completed by the end of July 2025. As at the end of July 2025, all required FRAs have been completed.

A breakdown of the compliance performance for FRAs by risk category is provided at Appendix 1 appended to this report, which includes the calculation of the TSM for BS02 (97.6%).

Following the successful improvement in the remediation of fire door defects by using BMTrada trained carpenters from the in-house team, the Building Safety Manager is now

the BMTrada appointed person, which means they can train and oversee up to 20 trade operatives.

Wolverhampton Homes has successfully applied for BMTrada certification for the full range of approved fire safety repair techniques (door repairs, door replacements and fire stopping). Further accredited training is being arranged to increase the scope of the remedial work the team can complete, which has provided an efficiency for the company in terms of training costs. The Building Safety Manager will be responsible for ensuring periodic checks and audits are undertaken of each operative to confirm they continue to carry out their work in a compliant manner.

The team has successfully retained its SP205 accreditation through BAFE (British Approvals for Fire Excellence), which is a third-party accreditation scheme approved by UKAS (United Kingdom Accreditation Service) to ensure the Fire Risk Assessments meet the requirements set out in the Regulatory Reform (Fire Safety) Order 2005.

The SP205 scheme sets out specific criteria to meet in terms of the competency of its assessors in completing fire risk assessments, and those with delegated responsibility to validate the fire risk assessments, as well as the management standards and work processes that are employed. The assessment process included an assessment of systems, processes, and the competency of staff through on site witnessing of fire risk assessments being completed as well as the administration systems employed to support the inspections. The accreditation must be updated whenever there is a change in the accredited personnel, e.g. the Fire Safety Officers or Building Safety Manager.

The applications for Building Assessment Certificates to the Building Safety Regulator for three High Risk Buildings, namely Brockfield House, Campion House and Longfield House, on the Heath Town estate, are currently being reviewed by the Building Safety Regulator.

2.10.5 Gas safety

Gas Servicing compliance is 99.99% at the end of June 2025, for the properties with a gas supply. Two properties currently have an overdue LGSR. However, Board should be assured Wolverhampton Homes is fully compliant with its policy / processes and both properties are currently going through the legal No Access Procedure to secure access as soon as possible.

A data quality review has been undertaken on all domestic assets on the Gas Servicing Programme along with an audit of the 'all electric' properties to validate records and confirm that customers have not had a gas supply installed or installed open flue appliances to their home without seeking permission from Wolverhampton Homes.

A review of the 'New Build' and 'Repurchased Properties' processes has been undertaken, and a robust procedure is in place to ensure any 'new' properties are added to the Gas Servicing Programme.

2.10.6 Lift safety

The servicing of passenger lifts remains 100% compliant at the end of Q4. The Passenger Lift Thorough Inspections in accordance with LOLER (the Lifting Operations and Lifting Equipment Regulations) is 100% compliant at the end of Q1 2025 - 2026, which is also unchanged.

The Domestic Lift Thorough Inspections for domestic lifting equipment (hoists, through floor lifts) is at 94.2% at the end of Q1 2025 - 2026. Eight pieces of equipment are currently overdue, with five of these are currently not in use. Wolverhampton Homes are currently working with their lifting services contractor to gain access to the outstanding properties.

2.10.7 Water safety

Water safety (Legionella testing) compliance remains unchanged at 100% at the end of Q1 2025 - 2026.

A review of data quality has commenced on all dwellings and communal areas to ascertain where there are water safety issues that need active management. Following this review, any follow up validation will be undertaken.

A review of the process for raising and completing remedial works is also due to take place later this financial year.

Colleagues from Wolverhampton Homes completed a City and Guilds Water Hygiene Responsible Person course in January 2025. Following completion of the course, a Water Hygiene Committee was established to oversee and ensure the effective management of water safety risks across all Wolverhampton Homes properties. The group provides strategic leadership, compliance reviews, and promote best practices in line with relevant legislation and guidance.

The Water Hygiene Management Plan 2025 was presented to Audit and Business Assurance Committee in August 2025. The Water Hygiene Management Plan sets out how the organisation, on behalf of the City of Wolverhampton Council, will effectively manage and minimise the risks associated with legionella bacteria in the premises under its management control.

2.10.8 Wider Property Compliance

In addition to the core asset compliance management areas, commonly referred to as the 'Big 7', Wolverhampton Homes is also responsible for a range of additional legislative and best practice compliance requirements. These activities are equally essential in ensuring the overall safety, functionality, and regulatory adherence of the Council's housing stock.

Overview of these wider compliance responsibilities, along with a summary of our performance and position as of the end of Q1 2025 - 2026.

Safety Compliance Area	Assets due within Q1	Assets completed within Q1	% Compliance end of Q1
Emergency Lighting	99	99	100%
Fire Alarms	12	12	100%
Intruder Alarms	13	13	100%
Fire Fighting Equipment	N/A	N/A	100%
Roof Fans	46	46	100%
Risers	N/A	N/A	100%
Eye-bolts (for fall restraint systems)	N/A	N/A	100%
Lightning Protection	42	42	100%
Handrails / Safety Lines	18	18	100%
Shutters	30	30	100%
Automated Opening Vents (Fire)	1	1	100%
Sprinkler Systems	21	21	100%
Air Conditioning	1	1	100%
Playground Equipment Annual Inspection	N/A	N/A	100%

3.0 City of Wolverhampton Council – Council Housing Improvement Programme

To support the Council's wider Consumer Assurance Framework, CWC have commissioned Savills to complete a 'Landlord Data Compliance Review' to inform and support their progress towards full regulatory compliance with the Regulator of Social Housing's Consumer Standards. WH colleagues are fully supporting this review, and the findings will be reported to Board at a future date.

3.1 Future compliance considerations

Residential Personal Emergency Evacuation Plans

Wolverhampton Homes is supporting the City Council to prepare for compliance with The Fire Safety (Residential Evacuation Plans) (England) Regulations 2025, which will come into effect from 06 April 2026. This introduces new duties on owners of higher risk residential buildings to address the fire safety concerns of their most vulnerable tenants.

Through these Regulations, residents with disabilities and impairments will be entitled to:

 a person-centred fire risk assessment to consider their specific individual risks and their ability to self-evacuate in the event of a fire.

- the measures that could be reasonably and proportionately introduced to mitigate against their risks.
- a written statement recording what each of these residents should do in the event of a fire.
- information shared with the local Fire and Rescue Service, so they know where the most vulnerable residents live and can support their evacuation or rescue in the event of a fire.

The Building Safety Manager has undertaken an assessment of the existing level of compliance, based on the current guidance, which will be presented to the Building Safety Committee, and will identify any areas for improvement. Progress towards compliance will be monitored by the Building Safety Committee and the City Council.

The revision of the Decent Homes Standard

In July 2025, the Ministry of Housing Communities and Local Government commenced consultation on proposals to reform the Decent Homes Standard for social and privately rented homes.

Some of the key proposed changes include:

- Updating the definition of disrepair removing the age requirement and updating thresholds.
- Expanding the list of building components, which must be kept in a reasonable state of repair (including kitchens and internal wall finishes).
- Revising the approach to the minimum 'modern facilities' a property must have to be classed as decent.
- Introducing a requirement for window restrictors.
- Considering the introduction of a requirement for new windows and external doors to comply with recognised security standards.
- Considering a requirement for floor coverings (carpeting) to be provided for new tenancies.
- Considering the requirement to bring aspects of the public realm into scope of the Decent Homes Standard (e.g., drying areas and bin stores at the rear of blocks of flats).
- Streamlining and updating the thermal comfort requirements, which will include the requirement for all homes to achieve a minimum of EPC Rating C by the implementation date (potentially 2035 or 2037).
- Introducing a new standard requiring homes to be free from damp and mould.

Wolverhampton Homes has supported the City Council with its response to the formal consultation, and WH is developing cost models to assist the Council to assess the financial impact of these proposals.

Once the Government has considered and responded to the feedback, there will be a better understanding of which of the proposals will be implemented.

Further additional 'compliance' metrics will then be identified to demonstrate ongoing compliance with the revised standard. Further updates will be provided to Board in due course.

Heat Network Regulations

From 01 April 2025, Ofgem began to introduce new legislation for district and communal 'heat networks', building upon the regulations already in place (the Heat Network Regulations 2014). This means that housing providers will become fully regulated energy suppliers much like British Gas, Scottish Power, Ovo and other gas and electricity companies.

These regulations will be the largest shift in the industry for many years, with the aim of:

- a) Providing the same levels of consumer protection to those living on heat networks as there is for those who have more conventional utility arrangements.
- b) Supporting the growth and decarbonisation of the heat network sector.

The new regulations will have far reaching impacts, including:

- Fair and transparent pricing
- Improving the quality of service provision
- Raising performance standards of heat networks
- Raising technical standards within the industry
- Identifying "step-in" arrangements (for failing providers)
- Vulnerable customer standards
- Metering standards
- Standards for customer communications
- Scheme monitoring arrangements
- Regular performance reporting to OFGEM
- Registration with the Energy Ombudsman

The Stock Sustainability Manager has prepared an assessment of our existing level of compliance, based on the current guidance, and developed an action plan that charts the path to compliance.

The new regulations will have significant implications for Wolverhampton Homes and its customers and will necessitate changes to the way the heat network portfolio is resourced. A business case is currently being prepared for the Council, which sets out what additional resources will be required.

4.0 Financial and value for money implications

4.1 Provision of the necessary financial resources to ensure compliance is made within the relevant revenue, or capital budgets.

5.0 Legal and regulatory implications

- 5.1 Wolverhampton Homes has a legal duty to ensure that it is compliant with the various acts and regulations in relation to building safety, as well as the relevant best practice documents such as Approved Codes of Practice (ACOPS).
- 5.2 Wolverhampton Homes must ensure these vital aspects of building safety remain compliant, as this ensures our customers (including leaseholders) can be confident that they will be safe in their homes.
- 5.3 Failure to maintain compliance will provide the opportunity for the relevant regulatory body (such as the Health & Safety Executive, the Regulator of Social Housing, or the Building Safety Regulator) to take enforcement action against Wolverhampton Homes / the City of Wolverhampton Council.

6.0 Human resources implications

- 6.1 Wolverhampton Homes employs qualified, experienced, and competent staff to fulfil its duty of care in each area of compliance. However, to retain and attract competent staff remains a constant challenge, especially given the market forces (fuelled by the lack of supply and increasing demand).
- 6.2 Detailed proposals of the changes required to staff structures to be able to effectively manage compliance will be presented to the Board in due course.

7.0 Health and safety implications

- 7.1 The Wolverhampton Homes Health and Safety Policy refers to a range of specific building safety compliance functions, which includes the management of the "Big-7".
- 7.2 There are policies, processes, and procedures in place for each of these building safety compliance functions, which are supported by compliance audits to ensure work is being done correctly.
- 7.3 The Senior Management Team and the Audit and Business Assurance Committee has previously received updated policies for the compliance activities detailed in section 1.2 above.

8.0 Equalities implications

- 8.1 Has an equality impact assessment been carried out? **Not applicable**.
- 8.2 Explanation: Each of these service areas has an equality assessment in place.

9.0 Impact on the environment and community

9.1 Ensuring compliance across all building safety compliance functions has a positive impact on the safety of customers, our staff, contractors, and members of the public.

10.0 Long term consequences for the company

10.1 Failure to ensure compliance could result in reputational damage or even legal action against the company and the responsible person in the event of an incident.

11.0 Impact on business relationships with suppliers, customers, and others

11.1 Failure to ensure compliance could result negatively on business relationships with suppliers, customers, and others.

12.0 Impact on Wolverhampton Homes' Management System

12.1 Will any new policy or policy updates have an impact on the management system? The updated Asbestos Management Plan has been replaced within WHMS.

13.0 List of Appendices

13.1 Appendix 1: Breakdown of Fire Risk Assessment Compliance

Appendix 1: Breakdown of Fire Risk Assessment Compliance

Category	Due within the month	Completed within the month	Percentage Compliance	
FRAs of High-Risk Premises				
April 2025	4	4		
May 2025	8	8		
June 2025	0	0		
Compliance position at end of the period	12	12	100.00%	
FRAs of Medium-Risk Premises				
April 2025	13	13		
May 2025	15	15		
June 2025	27	27		
Compliance position at end of the period	55	55	100.00%	
FRAs of Low-Risk Premises				
April 2025	4	4		
May 2025	12	12		
June 2025	0	0		
Compliance position at end of the period	16	16	100.00%	
New FRAs of Very Low-Risk Premises				
April 2025	1,103	0		
May 2025		203		
June 2025		755		
Compliance position at end of the period	1,103	958	86.85%	
Overall compliance position at and of the	1186	1041		
Overall compliance position at end of the reporting period = (percentage of blocks with a valid FRA)				

Please note, the Regulator of Social Housing's TSM BS02, which relates to fire risk assessments, is calculated by using the number of social housing dwelling units for which all specified safety checks have been carried out.

When this metric is used the compliance position is 97.6% (as it is only a small number of duplex blocks that remain incomplete following the change in guidance).

Specifically, at the end of Quarter 1:

- Social housing dwellings within low-risk, medium-risk and high-risk blocks = 6,235
- Of the above, those dwellings where there is a valid FRA for the block = 6,235
- Social housing dwellings within very low-risk blocks = 3,074
- Of the above, those dwellings where there is a valid FRA for the block = 2,848

Thus,

a) Social housing dwellings with a valid FRA in place = (6,235 + 2,848) b) Social housing dwellings = (6,235 + 3,074)

TSM BS 02; Fire Safety Checks (the sum of 'a' divided by the sum of 'b' x 100)

= 97.57%

Board Report

	Agenda Item 7	
WOLVERHAMPTON HOMES	18 September 2025 Revenue Budget Forecast for 2025 - 2026 as at 31 July 2025	
	Open Report	
Status:	For Information	
Author and job title:	James Howse, Interim Director of Finance	
Contact No:	07976 760697	
Recommendations:	Board Members are asked to note the revenue budget forecast for 2025 - 2026 as at 31 July 2025.	
Key risks and contentious issues:	There remains unprecedented pressure placed upon the Company budgets as a result of increased regulation, aging stock, inflation and increases in demand, alongside balancing this with customer expectations.	
	The revenue forecast for the year, as at 31 July 2025, is an overspend against budget of approximately £0.9 million. Reserves balances are currently at £0.8 million.	
	Mitigating action will need to be taken to ensure that WH can deliver an outturn position within budget in 2025 - 2026.	

Management Summary

1.0 Purpose

1.1 The purpose of this report is to inform the Board of the revenue budget forecast for the 2025 - 2026 financial year, based on the position as at 31 July 2025.

2.0 Background

- 2.1 As reported to the Board previously, the Company (and the housing sector more generally) has in recent months faced unprecedented pressures on its budgets driven by aging stock, inflation (pay and non-pay) and increases in demand, customer expectations and regulation.
- 2.2 The Company set a balanced budget for 2025 2026 in January 2025. This included management fee income from the Council of £51.7 million. The management fee reflected inflationary increases from 2024 2025 levels, as identified at the time of budget setting. It also reflected the £3 million increase in the management fee made during 2024 2025 as a result of demand led budget pressures identified during the year.
- 2.3 It should be noted that this management fee was appropriately adjusted to reflect the previous transfer of Homelessness services to the Council, which reduced the management fee budget (and corresponding expenditure budget) by circa £1 million.
- 2.4 In addition, the 2025 2026 budget included reductions of circa £0.9 million in relation to identified efficiencies made by Wolverhampton Homes at the time of budget setting.
- 2.5 In recognition of the unprecedented pressures on budgets, and the limited financial envelope available to the Company through the management fee, the efficiency approach has continued with the implementation of a Cost Improvement Plan a programme of work with the support of Board and Council.
- 2.6 The Cost Improvement Plan (CIP), which is ongoing, aims to identify further opportunities for cost reduction and efficiencies, through doing things differently and through (re) prioritisation of resources. All services are currently therefore subject to review and a number of CIP business cases are in development.
- 2.7 In recognition of the ongoing CIP and the pressures on budgets, and in order to maintain robust financial controls, a number of budgeted for vacant posts are currently being held, with recruitment subject to tight control via the Senior Management Team.

3.0 Revenue Forecast 2025 - 2026

3.1 The forecast revenue budget for 2025 - 2026 (by subjective areas) is set out below.

3.2 Table 1 – 2025 - 2026 Revenue Budget Forecast at 31 July 2025 (by subjective area)

Income and Expenditure	2025-2026 Budget £000		2025-2026 Variance £000
Expenditure			
Employee Costs	30,559	29,213	(1,346)
Non-Pay Costs	27,868	29,492	1,624
Total Expenditure	58,427	58,705	278
Trading Income	(5,537)	(4,935)	602
Other Income	(1,190)	(1,210)	(20)
Net Expenditure	51,700	52,560	861
Management Fee	(51,700)	(51,700)	0
Net Budget overspend	0	861	861

3.3 Table 1 shows that the revenue budget is, based on the position at 31 July 2025, forecast to be overspent by £0.861 million. The main variances are set out below:

3.4 Employee Costs (underspend of £1.346 million)

This underspend forecast (representing circa 4% of the pay budget) reflects both the prudent approach to pay related budgets at budget setting and the controls put in place around recruitment (as set out above). It is also consistent with the approach to hold a number of vacancies until such time CIP business cases are completed and actioned in the respective budget service arears. Over and above this, it also reflects the practical difficulties being experienced in the recruitment of appropriately skilled staff in some specific areas given the current job market, particularly in the area of repairs and maintenance.

It reflects the 'quick wins' identified through the CIP in year, in particular in relation to Occupational health, training and Lettings (overtime) budgets, where efficiencies have been identified and actioned.

It should be noted that the forecast includes the 3.2% pay award which has been settled and paid to staff as part of the August 2025 payroll.

As part of the CIP approach, further work is being undertaken to reconcile identified CIP opportunities to current underspent areas, with a view that the underlying and recurring pay budget will be updated accordingly.

4.0 Non-Pay Costs (Overspend of £1.624 million)

- 4.1 In a continuation to the trend seen since 2022 2023 (non-pay) repairs spend continues to increase, due to inflation, demand, the impact of damp and mould and increased regulation, and is the main reason for this forecast overspend on non-pay budgets.
- 4.2 The forecast overspend relates to both planned / programmed repairs work and responsive repairs and voids work.

- 4.3 Indicators of increased demand include the number of works order raised.
 - Based on activity levels at the end of the first quarter of the year, the total number of works orders (excluding cancelled and capitalised) in 2025 - 2026 is estimated at 94,635, compared to 87,075 the previous year. This would represent an 8.75% increase.
 - Responsive repairs is the area (within this total) with the greatest increase, with 61,538 works orders anticipated in the current financial year compared to 53,704 the previous year (representing a 14.6% increase).
- 4.4 It is also important to note that the average price of this activity is also increasing.
 - For instance, and in terms of the increased demand in responsive repairs noted above, the average cost of a responsive repairs work order was £148.51 at Q1, some 8.5% higher than the previous year's average of £136.86.
- 4.5 In addition, the forecast overspend includes £150,000 in relation to additional asbestos survey work.
- 4.6 In order to respond to these pressures, work is underway to identify and validate efficiency opportunities across the repairs and maintenance service area. This includes revisiting service levels and processes, reviewing supervision and management, considering the value of increased inspections and undertaking a value for money assessment between internal and external (contractor) provision across various trade groups.

5.0 Traded Income (Overspend of £0.602 million)

- 5.1 The main reason for this forecast variance relates to the Asbestos service. At the time of the budget setting some £550,000 of income was anticipated, primarily in relation to Asbestos removal services provided to the Council's strategic construction partners, engaged on the Council's capital investment programmes. Due to refocussing of the capital work streams, this income stream is now forecast to be only £40,000. Colleagues within this service area continue to support internal revenue activity, i.e. asbestos works for response repairs and to voids, and some have been reassigned to mould treatment works to maintain efficiency/productivity and reduce our contractor spend.
- 5.2 It should be noted that this reduction in income is partially matched by a (£0.2 million) saving on corresponding expenditure budgets and that in addition staff resources used to undertake this work previously have been reallocated to other priorities.

5.3 Table 2 – 2025 - 2026 Revenue Budget Forecast at 31 July 2025 (by Directorate)

Directorate	Budget £000's	Forecast £000's	Variance £000's
Corporate Services	11,342	10,247	-1,095
Property Services	32,379	34,462	2,084
Homes and Communities	7,979	7,851	-128
Total	51,700	52,560	861

5.4 Table 2 shows an alternative presentation of the 2025 - 2026 Revenue Budget Forecast position, by Directorate. This summary being set out in greater detail within Appendix 2, with the main variances and key pressures being set out below:

6.0 Corporate Services (overall underspend of £1.095 million)

- 6.1 The pay award budget of £0.86 million will be allocated at the end of the month. Given that there are currently 7 vacant posts related to the front-line service provision within Corporate, not all of this budget will be required.
- 6.2 The Customer Experience budget is forecast to underspend by £0.16 million. This is because of additional income being generated in relation to the delivery of homelessness customer services being provided to the Council in the first part of the year.
- 6.3 The Human Resources and Skills Development budget is forecast to underspend by £0.2 due to cost reductions opportunities identified in relation to occupational health and training budgets.

7.0 Property Services (Overall overspend of £2.084 million)

7.1 The Repairs budget is forecast to overspend in overall terms by £1.9 million and is therefore the main factor behind this overall directorate overspend position of £2.084 million. This is in line with the issues set out in section 4, given the major element of this relates to increased (non-pay) contractor spend forecast during the year.

8.0 Homes and Communities (Overall underspend of £0.128 million)

8.1 The overall underspend is made up of a broad range of savings consistently achieved across this directorate including Tenancy, Housing Options, Lettings and Income. These forecast underspends are consistent with the steps highlighted above to closely control recruitment, and to delay filling vacancies where feasible and where CIP options in those areas are being considered. None of these savings individually by service area being above £0.1 million.

Sensitivity: PROTECT

9.0 Summary of Financial Position at 31 July 2025

- 9.1 As detailed above, there are a number of reasons for the unprecedented pressure on Company budgets.
- 9.2 The revenue forecast for the year, as at 31 July 2025, is an overspend against budget of approximately £0.9 million.
- 9.3 Reserves balances are currently at £0.8 million.
- 9.4 Mitigating actions will need to be taken to ensure that WH can deliver an outturn position within budget in 2025 2026.

10.0 Financial and value for money implications

10.1 As set out above. Value for Money considerations are central to the approach to the Cost Improvement Plan approach.

11.0 Legal and regulatory implications

11.1 No direct implications arising from this report.

12.0 Human resources implications

12.1 There are no Human Resource implications to this report.

13.0 Health and safety implications

13.1 There are no Health and Safety implications to this report.

14.0 Equalities implications

- 14.1 Has an equality impact assessment been carried out? No
- 14.2 Explanation: Not applicable in respect of this report.

15.0 Equality, Diversity and Inclusion activity and impact on customer

15.1 Not applicable.

16.0 Impact on the environment and community

16.1 Not applicable.

17.0 Long term consequences for the company

17.1 No consequences arise directly from this report. However, sound financial management and operating with budget is an important element of long-term planning.

- 18.0 Impact on business relationships with suppliers, customers, and others
- 18.1 None arising directly from this report.
- 19.0 Impact on Wolverhampton Homes' Management System
- 19.1 None arising directly from this report.
- 20.0 List of Appendices
- 20.1 Appendix 1 Forecast Revenue Budget by Service

Appendix 1 – Forecast Revenue Budget by Service

Division	Service	Budget £000	Forecast £000	Variance £000	Reasons for Variance
Corporate	Business improvement	1,695	1,799	104	Postage, subscriptions and equipment
	Pay award budget	860	0	(860)	Budget for pay award
	Customer experience	5,211	5,048	(164)	Income for Homelessness calls Apr-Sept
	Governance / Exec Support	1,034	1,080	46	1 post requiring budget adjustment
	Human Resources	594	517	(77)	Professional fees and medical fees per CIP
	Skill Development	1,948	1,803	(145)	Training expenses (£35,000) CIP and salaries
	Subtotal	11,342	10,247	(1,095)	
Property	Building Solutions	5,894	6,149	255	Asbestos income reduction, partly offset by
					cost reduction
	Commercial	200	164	(36)	Waste management
	Construction	7,793	7,971	178	£150,000 additional asbestos surveys
	Property Directorate	285	208	(77)	Salaries (1 post)
	Repairs	15,167	17,104	1,937	Contract spend demand / inflation (see report)
	Stock Investment	3,040	2,866	(174)	Communal fuel – rate reduction
	Subtotal	32,379	34,462	2,084	
Homes and	Housing Management	396	342	(54)	Salaries
Communities	Directorate				
	Housing Operations	842	836	(6)	
	Income	1,818	1,815	(3)	
	Tenancy	1,745	1,720	(25)	Salaries
	Estate Services	2,309	2,304	(5)	
	Lettings	869	834	(35)	Removal of overtime per CIP
	Subtotal	7,979	7,851	(128)	
Total		51,700	52,560	861	