

Item: 15

Education, Leisure and Housing Committee: 6 September 2023.

Policy on Dampness.

Report by Corporate Director for Education, Leisure and Housing.

1. Purpose of Report

To consider a Dampness Policy, including Dealing with Mould.

2. Recommendations

The Committee is invited to note:

2.1.

That each year, the Council receives an average of 27 requests for service from its tenants as a result of issues with damp and mould.

2.2.

That a Dampness Policy, including Dealing with Mould, has been developed in line with guidance produced by the Chartered Institute of Housing, the Association of Local Authority Chief Housing Officers and the Housing Ombudsman, to ensure that the Council's delivery of housing services is appropriately robust in dealing with damp and mould.

It is recommended:

2.3.

That the Dampness Policy, including Dealing with Mould, attached as Appendix 1 to this report, be approved.

3. Introduction

3.1.

Following the tragic death of Awaab Ishak in Rochdale, as a result of damp and mould in a social rented property, a national movement began in relation to ensuring all social housing providers had appropriate policies in place to ensure reports of dampness, condensation and mould led to appropriate responses to assist tenants in managing their properties so they could live comfortably.

3.2.

Key guidance has been produced by the Chartered Institute of Housing and the Association of Local Authority Chief Housing Officers (ALACHO) called "How to Deal

with Damp and Mould” and the Housing Ombudsman called “Spotlight on: Damp and Mould, It’s Not Lifestyle”. These provide guidance for social housing providers which includes:

- Having a policy and procedures outlining responses to complaints.
- Monitor progress and ensure there is a follow up after a period of time.
- Produce written information to assist tenants.
- Keep log of all reports and proactively check similar properties.
- Ensure all staff are appropriately trained.
- Endeavour to ensure tenants feel they are listened to and supported.

3.3.

The Council's Housing Service receives a small number of requests for service from its tenants to assist with issues of damp and mould annually. The figures for the last three years been as follows:

Financial Year.	Number of requests for service.
2020/21.	28.
2021/22.	25.
2022/23.	27.
Average.	27.

4. Dampness Policy including Dealing with Mould

4.1.

A Dampness Policy, including Dealing with Mould, has been developed, in line with the guidance referred to at section 3.2 above, and is attached at Appendix 1.

4.2.

Dampness is an important housing issue and it is essential that sound policy objectives be developed in line with national guidance. These include:

- Meeting relevant legal and regulatory standards relating to dampness in Council housing.
- Take account of good practice guidance when developing the Council's Dampness Policy and related procedure.
- Integrate dampness issues into a range of housing services so that dampness is addressed comprehensively as part of service delivery.
- Provide information to tenants about the nature of dampness and how to access local agencies which can provide further advice.
- Monitor all incidents of dampness relating to the Council's housing services through a range of local performance indicators.
- Provide staff training to promote effective implementation of the dampness policy.

- Offer tenants advice and information about the Council's complaint system.
- Review the Council's Dampness Policy every five years or sooner, as required, for instance, due to legal changes or new guidance.

5. Procedural Responses to Damp

5.1.

- Procedures need to include changes to void (empty properties) management policy.
- Tenancy sign ups need to include advice to tenants, how to manage highly insulated properties and avoid damp and mould and ensuring home visits are actively encouraged.
- Tenants should be encouraged to report issues early.
- Staff training should be intensive and include customer care to ensure that the tenant feels appropriately listened to and supported.
- Log of all cases of damp/mould leading to proactive checking of similar properties.
- Detailed procedures have been developed for use by staff in Housing and Neighbourhood Services and Infrastructure.
- Tenant consultation should follow the implementation of the policy to ensure they are apprised of the situation.

5.2.

The attached Policy ensures structures are in place at different key stages including when properties are void (empty), when a new tenant moves in and while occupied. In addition, monitoring processes will be formalised and increased. The Policy is underpinned by comprehensive staff procedures and guidance.

5.3.

It is anticipated that formal monitoring in the form of a performance indicator will be put in place in due course and that the information will be required by the Scottish Housing Regulator on an annual basis along with the significant levels of performance information which is already provided.

5.4.

An information leaflet, to become part of the Council's existing Tenants' Handbook, is being produced which will replace the generic leaflet produced by the Scottish Government which is currently used.

5.5.

Staff have received training by the Chartered Institute of Housing this summer and specific procedural training on the policy will follow later this year.

6. Equalities Impact

An Equality Impact Assessment has been undertaken and is attached as Appendix 2 to this report.

7. Island Communities Impact

An Island Communities Impact Assessment has been undertaken and is attached as Appendix 3 to this report.

8. Links to the Council Plan

8.1.

The proposals in this report support and contribute to improved outcomes for communities as outlined in the Council Plan strategic priority of Developing our Infrastructure.

8.2.

The proposals in this report relate directly to Priority 16 Social Housing of the Council Delivery Plan.

9. Financial Implications

There are no financial implications arising directly from this report. Any costs associated with this policy will be required to be met within existing resources.

10. Legal Aspects

10.1.

The Housing (Scotland) Act 2001 requires that landlords must ensure that properties are wind and watertight and in all other respects reasonably fit for human habitation at the point of let, and keep the properties in such condition throughout the tenancy.

10.2.

In terms of the Council's tenancy agreement, the Council undertakes to carry out repairs relating to water penetration, rising dampness and condensation dampness. The Council also undertakes to maintain the house so that a tenant can heat the house to a reasonable temperature at a reasonable cost, and adequately ventilate it so as to avoid condensation dampness and mould.

11. Contact Officers

James Wylie, Corporate Director for Education, Leisure and Housing, extension 2477, Email james.wylie@orkney.gov.uk.

Frances Troup, Head of Community Learning, Leisure and Housing, extension 2450, Email frances.troup@orkney.gov.uk.

12. Appendices

Appendix 1: Policy on Damp, Including Dealing with Mould.

Appendix 2: Equality Impact Assessment.

Appendix 3: Island Communities Impact Assessment.



Dampness Policy including dealing with mould

July 2023

Version Control

Document Reference.	Rev.	Issue date.	Reason for issue.	Reviewer.
HD POL 145.	Draft.	21/07/2023.	New.	Head of Community Learning, Leisure and Housing.

Contents

Section 1: Dampness policy: strategic context	4
Section 2: Dampness policy objectives	5
Section 3: The legal and regulatory framework	6
Section 4: Implementing our dampness policy	8
Section 5: Staff training	10
Section 6: Partnership Working	11
Section 7: Performance management	12
Section 8: Complaints	13
Section 9: Consultation and review of policy	14

We can produce this document in different formats such as in larger print or audio-format; we can also translate the document into various languages, as appropriate.

Section 1: Dampness policy: strategic context

1.1. Purpose of our dampness policy

We have developed this dampness policy to establish an appropriate framework that we use to address dampness issues that may arise in relation to our housing stock. This framework includes, not only policy objectives, but a range of activities that are critical in ensuring effective implementation of policy objectives as well as monitoring progress.

1.2. Comprehensive service provision

We recognise that dampness is a complex matter as it may involve dealing, not only with one specific cause, but with a range of physical, social and environmental issues. Our approach reflects this latter perspective, then, by mainstreaming actions to address dampness across a range of housing and maintenance services.

1.3. Linking council strategies

As well as providing comprehensive housing services, we also link council strategies so that dampness issues are considered systemically. For example, our dampness policy and procedure can be linked to three other Orkney Islands Council strategies and policies, namely fuel poverty¹, equality and diversity² and tenant participation³. Fuel poverty is a major issue in Orkney; this is likely to continue in line with rising fuel costs and food prices. And inadequate or inappropriate heating provision can be a contributory factor in causing dampness.

Our equality and diversity policy aims to address a wide range of barriers that may lead to people being excluded from active participation in society. Damp housing can be one of these barriers, not forgetting its effects on the health of tenants and their families. Addressing dampness is, therefore, central to our equality strategic policy objective of promoting an inclusive society in Orkney.

Finally, given that dampness is an important housing issue, it is essential that we develop this dampness policy in liaison with our tenants and other local groups. We do this through our tenant participation strategy.

1.4. Summary

Our dampness policy sets out our policy objectives and the activities we undertake to ensure its effective implementation. The policy is linked to key Council strategies so it is not viewed as an issue to be addressed in isolation but as integral to Orkney governance.

¹ Orkney Islands Council Fuel Poverty Strategy (2017 – 2022) <https://www.orkney.gov.uk/Service-Directory/H/strategy-and-policy.htm>

² Orkney Islands Council Equality and Diversity Policy 2021 <https://www.orkney.gov.uk/Service-Directory/H/strategy-and-policy.htm>

³ Orkney Islands Council Tenant Participation Strategy (Consultative Draft) 2021 - 2026 <https://www.orkney.gov.uk/Service-Directory/H/strategy-and-policy.htm>

Section 2: Dampness policy objectives

This section explains our dampness policy objectives which are comprehensive and holistic in nature as they cover a range of organisational activities.

2.1. Policy objectives

In line with our eight dampness policy objectives, we:

- Meet relevant legal and regulatory standards relating to the Scottish Housing Quality Standard and in particular those standards that effect dampness.
- Reduce dampness and the causes of dampness within our housing stock.
- Take account of good practice guidance when developing our dampness policy and related procedure.
- Integrate dampness issues into a range of housing services so that dampness is addressed comprehensively as part of service delivery.
- Provide information to tenants about the nature of dampness and how to access local agencies which can provide further advice.
- Monitor all incidents of dampness relating to our housing services through a range of local performance indicators.
- Provide staff training to promote effective implementation of the dampness policy.
- Offer tenants advice and information about our complaint system.
- Review our dampness policy every five years or sooner, as required, for instance, due to legal changes or new guidance.

2.2. Summary

This section has described our main dampness policy objectives. These objectives describe the framework of principles that regulate how we address dampness in relation to council housing in Orkney. The implementation of the dampness policy is achieved through internal staff procedures.

Section 3: The legal and regulatory framework

3.1. Background

Section 3 provides a plain language guide to key legal and regulatory requirements that we meet in relation to council housing. This is not intended as a definitive statement of law.^{4;5}

3.2. Housing (Scotland) Act 2001, Schedule 4

We are required to ensure that our houses are wind and watertight – and in all other respects fit for human habitation – when we let them. We must also keep houses in this condition throughout the tenancy.

Before we let our houses, we are required to inspect houses to identify work required to meet the above statutory standard.

We must also carry out work within a reasonable time; either after being notified by tenants or otherwise becoming aware of it, for example, during house visits. We must also rectify any damage we cause when carrying out the repairs. We may enter a house to inspect it and/or carry out works provided we give the tenant twenty fours written notice.

These duties are encapsulated within our tenancy agreement that is signed by Scottish secure tenants.

3.3. The Housing (Scotland) Act 1987, section 86

The Housing (Scotland) Act 1987 places a duty on every local authority to secure that all houses in their area which do not meet the tolerable standard are closed, demolished or brought up to the tolerable standard. This duty applies to all tenures which means that we must ensure that council houses meet the current tolerable standard.⁶ This standard requires us to ensure that our houses are substantially free from rising and/or penetrating damp, as well as being satisfactorily provided with heating, ventilation and insulated.⁷

This tolerable standard is also part of the Scottish Housing Quality Standard, the Standard that we are required to meet as part of our monitoring requirements.

⁴ Information about law is provided to housing staff as part of ongoing training. The law in relation to dampness is complex. The law is supported in practice by a wide range of guidance; this is contained in our staff procedures on dampness.

⁵ Other law can also be relevant to addressing dampness, for example, environmental health law, in particular law relating to dealing with statutory nuisance; this is an issue covered in staff training when remedies available to tenants are considered, but is beyond the scope of this policy.

⁶ The Housing (Scotland) Act 1987, section 85 (1).

⁷ The Housing (Scotland) Act 1987, section 86, (1) (b). Our houses must also have satisfactory provision for ventilation and heating (Housing (Scotland) Act 1987, section 86 (1) (c)).

3.4. Our tenancy agreement: Scottish secure tenants

Our tenancy agreement is the contractual document that our tenants sign. This document sets out the rights and obligations of Orkney Islands Council and its tenants. With reference to repair law, the document specifies compliance with the statutory provisions above.⁸

The tenancy agreement, Clause 5.6. covers dampness, too, so it is important to cite Orkney Islands Council's contractual obligations in full.

“Our general repair obligations contained in paragraphs 5.2 and 5.3 include a duty to carry out repairs relating to water penetration, rising dampness and condensation dampness as well as the obligations contained in this paragraph. We will provide and maintain the house so that any tenant who we might reasonably expect to live in the house can heat the house to a reasonable temperature at a reasonable cost, so as to avoid condensation, dampness and mould. If during the tenancy, the house suffers from condensation dampness which is partially or wholly caused by a deficiency in, or absence of, any feature of the house (including insulation, provision for heating or ventilation), we will carry out repairs (including, where appropriate, replacement, addition or provision of insulation, ventilation or heating systems) within a reasonable time so that that feature is not a cause of the condensation dampness.”

3.5. Regulatory provisions

The Scottish Housing Regulator is expected to develop specific regulatory provisions for the purposes of monitoring responses to damp and mould and this section will reflect their requirements when these are published.

3.6. Summary

Our statutory duties to address dampness are covered in both housing law and our main contractual document that Scottish secure tenants sign. Section 4 now summarises in outline how we translate these objectives into practice.

⁸ Orkney Scottish Secure Tenancy Agreement, Clauses 5.2. and 5.3.

Section 4: Implementing our dampness policy

If dampness issues are to be addressed to satisfy legal and contractual obligations, it is essential to incorporate actions across a range of staff procedures. This section describes these key actions that are, in turn, detailed in actual council housing documentation. These procedures can be categorised under three headings as follows: empty housing; tenanted homes; monitoring; and using dampness data to improve future housing services. The text below is a summary of key actions with details contained in our staff procedures.

4.1. Empty houses

4.1.1. Actions before houses are let

As part of our void management policy and procedure, we carry out an inspection of houses before they are let. One of the key activities within this procedure includes assessment of whether a house is damp. This covers three main categories of dampness, namely penetrating damp, rising damp and condensation damp. Having identified the nature of the dampness and its extent, appropriate repairs are then implemented to address the dampness, including the treatment of mould.

4.1.2. Tenancy sign-ups and information to tenants

At the tenancy sign-up stage for new tenants, we provide tenants with an information leaflet about dampness; this is part of their Tenants' Handbook. This information describes in plain language the different forms of dampness and steps that can be taken to address the issue. One of these steps is, of course, to contact Orkney Islands Council promptly to address the issue as quickly as possible. At the sign-up stage, we inform tenants of our home visit service during which a qualified staff member will visit them at home to provide practical guidance about using heating systems appropriately and how best to conserve energy and reduce fuel costs.

4.2. Tenanted homes

4.2.1. Home visits

At the home visit during which information about using heating systems is given, the officer concerned will also provide more detailed technical guidance about dampness and signs to be aware of. This will assist in reinforcing the message that the causes of dampness are complex and involve an array of inter-acting elements.⁹ This approach is emphasised in staff training when it is highlighted that dampness is not something that can be attributable solely to tenants' actions.

4.2.2. Dampness notification by tenants

If a tenant reports dampness and or mould, this is covered within our repairs and maintenance procedures. This triggers a range of actions as follows: home visit by a Housing Officer and a Building Inspector within a set period to visit and inspect the nature and extent of the damage; determining, in liaison with the tenant, the most

⁹ These can be physical, personal and environmental in nature.

appropriate way to address the dampness and treat mould; and organising repairs as necessary.

At this meeting, information about any possible claims for damages should be discussed and information passed to our internal Insurance Officer to process.

4.3. Monitoring

Our monitoring system has been established to ensure that dampness monitoring is contextualised and takes account of issues relevant to Orkney Islands Council. Further information is provided in Section 5.

4.4. Using dampness data to improve future housing services

Dampness data is extremely important as we use this to inform a wide range of service related matters. For example, data about types of housing affected by dampness can be used to examine how this might be linked to property design and its facilities such as heating systems. Again, by identifying types and numbers of households affected by damp housing, we can use this data to target services more appropriately (actions linked directly to identified needs).

4.5. Summary

We have mainstreamed our dampness policy objectives into a range of housing management and maintenance services; these are encapsulated into a number of separate housing procedures. This section has described these procedures that form separate and substantial organisational documentation.

Section 5: Staff training

Staff training is vital if we are to implement our dampness policy objectives effectively. Training on dampness is carried out based on our dampness policy and its related dampness staff procedures; this is reinforced by inserting dampness commitments into the documentation of a range of separate housing services.¹⁰

5.1. Our dampness training programme

Our training programme covers the following topics:

- Our dampness policy.
- The nature of dampness.
- The causes of dampness (consciousness raising about the diverse causes of dampness).
- Identifying dampness during the void inspection.
- Explaining our obligations to tenants about dampness at tenancy sign-up stage (law and regulatory framework).
- Heating costs and income maximisation.
- Information leaflet to tenants about dampness, including judicial and non-judicial remedies.
- Post-tenancy visit to provide detailed information about using heating systems and how to address dampness.
- Responding to dampness complaints and identifying what is to be done (in liaison with the tenant concerned).
- Dealing with claims for compensation.
- Monitoring dampness reports.
- Using monitoring data to improve service delivery.

5.2. Summary

Staff training on dampness is comprehensive in nature and involves ensuring housing and maintenance services are harmonised.

¹⁰ Void management; the tenancy agreement provisions; tenancy agreement sign-up; information leaflets; post-tenancy sign-up home visits; and repairs and maintenance procedures (asset management).

Section 6: Partnership Working

We promote partnership working in Orkney Islands Council to ensure that tenants can access appropriate forms of support and guidance. This applies in the case of dampness too. Agencies and organisations that tenants can contact about dampness related matters are as follows:

Orkney Citizen's Advice Bureau

- Address: Anchor Buildings, 6 Bridge Street, Kirkwall, KW15 1HR.
- Telephone: 01856 875266.

THAW Orkney

- Address: Unit 4, Anchor Buildings, 6 Bridge Street, Kirkwall, KW15 1HR.
- Telephone: 01856 878388.

Section 7: Performance management

In order to evaluate if our dampness policy is being implemented effectively, we have established a local performance management system. This covers the following issues: dampness in empty houses; dampness in tenanted homes; compensation claims relating to dampness; complaints about dampness; and legal actions.

7.1. Dampness in empty houses

- Numbers and types of houses in which dampness is identified and by area/location.
- Types of dampness by category (penetrating damp, rising damp and condensation damp).
- Actions taken to remedy.

7.2. Dampness in tenanted homes

- Numbers and types of houses in which dampness is identified and by area/location.
- Profiles of households affected (equality data).
- Types of dampness by category (penetrating damp, rising damp and condensation damp).
- Actions taken to remedy.

7.3. Compensation claims relating to dampness

- Numbers of compensation claims made and by type of house and area.
- Numbers settled and outcomes.

7.4. Complaints about dampness

- Numbers of complaints about dampness and by type of house and area.
- Numbers settled and outcomes.

7.5. Legal actions relating to dampness

- Numbers of legal claims made and by type of house and area.
- Numbers settled and outcomes.

7.6. Summary

Our performance management system in relation to dampness is focussed on local context and intended to provide information that can be used to enhance future housing services, as appropriate.

Section 8: Complaints

We define a complaint as:

“An expression of dissatisfaction by one or more members of the public about the local authority’s action or lack of action, or about the standard of service provided by or on behalf of the local authority”.

A copy of the Council’s Corporate Complaints Procedure is available on request from the Council offices or can be downloaded from our website.

Applicants should note that an independent review of decisions is available by referring a case to the Public Sector Ombudsman after the complaints procedure has been used.

This is a free and impartial service and a leaflet giving details is available at the Council offices.

The Ombudsman’s address is:

Scottish Public Services Ombudsman,
Bridgeside House,
99 McDonald Road,
Edinburgh,
EH7 4NS.

Telephone: 08003777330.

Section 9: Consultation and review of policy

Consultation is part of our tenant participation strategy and we use a wide range of consultation methods to reflect the needs of people in our community. These methods also take into account of accessibility requirements of disabled people.



Equality Impact Assessment

The purpose of an Equality Impact Assessment (EqIA) is to improve the work of Orkney Islands Council by making sure it promotes equality and does not discriminate. This assessment records the likely impact of any changes to a function, policy or plan by anticipating the consequences, and making sure that any negative impacts are eliminated or minimised and positive impacts are maximised.

1. Identification of Function, Policy or Plan	
Name of function / policy / plan to be assessed.	Policy on Dealing with Damp (Including Mould).
Service / service area responsible.	Housing Services
Name of person carrying out the assessment and contact details.	Frances Troup, Head of Community Learning, Leisure and Housing, Ext 2450 Email frances.troup@orkney.gov.uk .
Date of assessment.	21 July 2023.
Is the function / policy / plan new or existing? (Please indicate also if the service is to be deleted, reduced or changed significantly).	New.

2. Initial Screening	
What are the intended outcomes of the function / policy / plan?	To set out how Orkney Islands Council's Housing Service responds to and supports those tenants who submit service requests.
Is the function / policy / plan strategically important?	Yes. It links to the national movement in relation to dealing with damp and mould in social rented housing.
State who is, or may be affected by this function / policy / plan, and how.	Anyone experiencing damp and / or mould, in social rented housing.
How have stakeholders been involved in the development of this function / policy / plan?	The Chartered Institute of Housing has worked with its members, tenants, communities, partners and housing professionals to highlight good

	<p>practice to raise awareness of the issues and help the sector improve tenants' housing quality.</p> <p>Locally, tenants have been involved in sessions through the Community Fridge etc in relation to the cost of living crisis.</p> <p>An article will be published in Housing News to ensure tenants are aware of the development of the policy and what it aims to achieve.</p>
<p>Is there any existing data and / or research relating to equalities issues in this policy area? Please summarise.</p> <p>E.g. consultations, national surveys, performance data, complaints, service user feedback, academic / consultants' reports, benchmarking (see equalities resources on OIC information portal).</p>	<p>Yes. The Chartered Institute of Housing and the Association of Local Authority Chief Housing Officers (ALACHO) called "How to Deal with Damp and Mould" and the Housing Ombudsman called "Spotlight on: Damp and Mould, It's Not Lifestyle". These provide guidance for social housing providers re how to assist households who experience damp and mould in social rented housing.</p>
<p>Is there any existing evidence relating to socio-economic disadvantage and inequalities of outcome in this policy area? Please summarise.</p> <p>E.g. For people living in poverty or for people of low income. See The Fairer Scotland Duty Guidance for Public Bodies for further information.</p>	<p>There is significant research in this policy area. The Chartered Institute of Housing and the Association of Local Authority Chief Housing Officers (ALACHO) called "How to Deal with Damp and Mould" and the Housing Ombudsman called "Spotlight on: Damp and Mould, It's Not Lifestyle". These provide guidance for social housing providers re how to assist households who experience damp and mould in social rented housing. This can be linked to poverty and difficulties in being able to afford to adequately heat properties and the importance of ensuring they meet appropriate standards.</p>
<p>Could the function / policy have a differential impact on any of the following equality areas?</p>	<p>(Please provide any evidence – positive impacts / benefits, negative impacts and reasons).</p>
<p>1. Race: this includes ethnic or national groups, colour and nationality.</p>	<p>No significant impact identified.</p>
<p>2. Sex: a man or a woman.</p>	<p>No significant impact identified.</p>
<p>3. Sexual Orientation: whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.</p>	<p>No significant impact identified.</p>

4. Gender Reassignment: the process of transitioning from one gender to another.	No significant impact identified.
5. Pregnancy and maternity.	No significant impact identified.
6. Age: people of different ages.	No significant impact identified.
7. Religion or beliefs or none (atheists).	No significant impact identified.
8. Caring responsibilities.	No significant impact identified.
9. Care experienced.	No significant impact identified.
10. Marriage and Civil Partnerships.	No significant impact identified.
11. Disability: people with disabilities (whether registered or not).	No significant impact identified.
12. Socio-economic disadvantage.	While damp and mould can technically be experienced by anyone, there are greater links to socio-economic disadvantage given that those who live in fuel poverty may be less able to ensure that a property is sufficiently heated to reduce the likelihood of mould growth.

3. Impact Assessment


Does the analysis above identify any differential impacts which need to be addressed?	Yes, there is a potential greater impact identified as a result of socio-economic disadvantage. This has been addressed throughout the EQiA.
How could you minimise or remove any potential negative impacts?	The Policy on Damp (Including Dealing with Mould) seeks to provide preventative and responsive services to assist. We monitor the level of requests for service and will track the effectiveness of steps to remedy issues.
Do you have enough information to make a judgement? If no, what information do you require?	Yes.

4. Conclusions and Planned Action

Is further work required?	No.
What action is to be taken?	N/A.
Who will undertake it?	N/A.

When will it be done?	N/A.
How will it be monitored? (e.g. through service plans).	N/A.

Date: 21 July 2023



Signature:

Name: FRANCES TROUP

(BLOCK CAPITALS).

Please sign and date this form, keep one copy and send a copy to HR and Performance. A Word version should also be emailed to HR and Performance at hrsupport@orkney.gov.uk

Island Communities Impact Assessment

[Policy on Damp (Including Dealing with Mould), Housing Services]

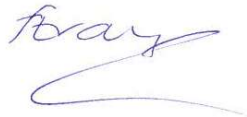
Preliminary Considerations	Response
Please provide a brief description or summary of the policy, strategy or service under review for the purposes of this assessment.	Policy on Dealing with Damp (Including Dealing with Mould) for Housing Services.
Step 1 – Develop a clear understanding of your objectives	Response
What are the objectives of the policy, strategy or service?	To set out how Orkney Islands Council's Housing Service responds to service requests in relation to damp (including dealing with mould).
Do you need to consult?	We must consult our tenants on any changes which will affect them. The policy is being introduced as a result of a national policy change and we will communicate that change accordingly.
How are islands identified for the purpose of the policy, strategy or service?	The policy covers the whole local authority area which includes all the inhabited islands.
What are the intended impacts/outcomes and how do these potentially differ in the islands?	To ensure the Housing Service has in place an appropriate policy on damp including dealing with mould. The legislative provision is the same in the islands.
Is the policy, strategy or service new?	Yes.
Step 2 – Gather your data and identify your stakeholders	Response
What data is available about the current situation in the islands?	Data from service requests as a result of damp and dealing with mould is monitored across Orkney.
Do you need to consult?	No.

How does any existing data differ between islands?	The numbers are tiny so there will not be presentations from each island in any year. A small number of cases will exist in an isles location and the precise location will vary year to year.
Are there any existing design features or mitigations in place?	The Housing Service would make appropriate arrangements with any household which needed assistance in the isles. This may include assistance to hold the initial relevant discussion by phone or Microsoft Teams, followed by a home visit undertaken by Housing staff or a contractor as relevant.
Step 3 – Consultation	Response
Who do you need to consult with?	We must consult our tenants on any changes which will affect them. The policy is being introduced as a result of a national policy change and we will communicate that change accordingly through Housing News our tenant newsletter and through our Tenant Participation structures.
How will you carry out your consultation and in what timescales?	Article in Housing News in next edition.
What questions will you ask when considering how to address island realities?	The consultation is about notification of forthcoming changes rather than seeking views per se. The policy change stems from a national policy change.
What information has already been gathered through consultations and what concerns have been raised previously by island communities?	N/A.
Is your consultation robust and meaningful and sufficient to comply with the Section 7 duty?	N/A.
Step 4 – Assessment	Response
Does your assessment identify any unique impacts on island communities?	No.

Does your assessment identify any potential barriers or wider impacts?	No.
How will you address these?	N/A.
<p>You must now determine whether in your opinion your policy, strategy or service is likely to have an effect on an island community, which is significantly different from its effect on other communities (including other island communities).</p> <p>If your answer is No to the above question, a full ICIA will NOT be required and you can proceed to Step 6.</p> <p>If the answer is Yes, an ICIA must be prepared and you should proceed to Step 5.</p> <p>To form your opinion, the following questions should be considered:</p> <ul style="list-style-type: none"> • Does the evidence show different circumstances or different expectations or needs, or different experiences or outcomes (such as different levels of satisfaction, or different rates of participation)? • Are these different effects likely? • Are these effects significantly different? • Could the effect amount to a disadvantage for an island community compared to the Scottish mainland or between island groups? 	
Step 5 – Preparing your ICIA	Response
In Step 5, you should describe the likely significantly different effect of the policy, strategy or service:	N/A.
Assess the extent to which you consider that the policy, strategy or service can be developed or delivered in such a manner as to improve or mitigate, for island communities, the outcomes resulting from it.	N/A.
Consider alternative delivery mechanisms and whether further consultation is required.	N/A.
Describe how these alternative delivery mechanisms will improve or mitigate outcomes for island communities.	N/A.

Identify resources required to improve or mitigate outcomes for island communities.	N/A.
Stage 6 – Making adjustments to your work	Response
Should delivery mechanisms/mitigations vary in different communities?	No.
Do you need to consult with island communities in respect of mechanisms or mitigations?	No.
Have island circumstances been factored into the evaluation process?	Yes, island circumstances are always factored into our policies relating to Housing as we deliver Housing Services across a broad range of island communities.
Have any island-specific indicators/targets been identified that require monitoring?	No.
How will outcomes be measured on the islands?	Outcomes on the islands will be measured in the same way as for requests for service on mainland Orkney as is appropriate.
How has the policy, strategy or service affected island communities?	Issues with damp and / or mould may originate from any community. This policy is about ensuring the forthcoming national policy change is delivered accordingly.
How will lessons learned in this ICIA inform future policy making and service delivery?	N/A.
Step 7 – Publishing your ICIA	Response
Have you presented your ICIA in an Easy Read format?	Yes.
Does it need to be presented in Gaelic or any other language?	No.
Where will you publish your ICIA and will relevant stakeholders be able to easily access it?	Orkney Islands Council's Website with Committee Report and Minute on Policy on Damp (Including Dealing with Mould).

Who will signoff your final ICIA and why?	James Wylie, Corporate Director of Education, Leisure and Housing – line manager of Frances Troup.
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ICIA completed by:	Frances Troup
Position:	Head of Community Learning, Leisure and Housing
Signature:	
Date complete:	21 July 2023

ICIA approved by:	James Wylie
Position:	Corporate Director for Education, Leisure and Housing
Signature:	
Date complete:	