

City of York Council

Equalities Impact Assessment

Who is submitting the proposal?

Directorate:	Housing and Communities		
Service Area:	Housing		
Name of the proposal :	Damp and Mould Policy		
Lead officer:	Fiona Brown/Rachael Bassett		
Date assessment completed:	09/12/2025		
Names of those who contributed to the assessment :			
Name	Job title	Organisation	Area of expertise
Fiona Brown	Head of Housing Strategy and Performance	CYC – Housing Strategy & Performance	Housing Strategy, Policy and Business Change
Rachael Bassett	Housing Services Change Manager	CYC – Housing Strategy & Performance	Housing Strategy, Policy and Business Change
Imogen Kerr	Assistant Housing Policy Officer	CYC – Housing Strategy & Performance	Housing Strategy and Policy

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Andrew Bebbington	Housing Strategy Officer	CYC – Housing Strategy & Performance	Housing Strategy and Policy
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Step 1 – Aims and intended outcomes

1.1	What is the purpose of the proposal? Please explain your proposal in Plain English avoiding acronyms and jargon.
	<p>The damp and mould policy outlines the council's approach to the management of mould and condensation in our tenants' homes.</p> <p>It gives guidance to staff, tenants and stakeholders on how the council will respond to issues of and prevent damp and mould and provides a framework on how the Council will meet the legal requirements.</p> <p>The policy sets standards for ensuring tenants do not face damp and mould in their homes and establishes a proactive, "zero tolerance" approach to support tenants' health and wellbeing.</p>

1.2	Are there any external considerations? (Legislation/government directive/codes of practice etc.)
	<p>There is significant context that the policy responds to:</p> <p>Landlord and Tenant Act 1985 Housing Health and Safety Rating System (HHSRS) introduced by Housing Act 2004 Homes (Fitness for Human Habitation) Act 2018 Environmental Protection Act EPA 1990 Regulator of Social Housing: Safety and Quality Standard Decent Homes Standard 2006 Social Housing (Regulation) Act 2023 introduced Awaab's Law Housing Act 1985 Defective Premises Act 1972 Pre-Action Protocol for Housing Conditions claims (England 2012) Equality Act 2010 Housing Ombudsman spotlight on damp and mould</p>

1.3	Who are the stakeholders and what are their interests?
	<p>All tenants and leaseholders have an interest in the area covered by this policy and in effective council services to prevent and deal with damp and mould. Tenants should also know their role in reporting issues and have some understanding of how they can prevent and treat damp and mould.</p> <p>Housing and building services staff are other key stakeholders. Staff should understand their responsibilities for dealing with damp and mould as well as the expected timeline for investigation and repair.</p> <p>The policy provides wider benefits for services and partners including in health, social care and education due to the benefits of a healthy home for occupants.</p>

1.4	<p>What results/outcomes do we want to achieve and for whom? This section should explain what outcomes you want to achieve for service users, staff and/or the wider community. Demonstrate how the proposal links to the Council Plan (2023- 2027) and other corporate strategies and plans.</p>
	<p><u>The intended outcomes of the policy are as follows:</u></p> <ul style="list-style-type: none"> • Improve service quality for tenants in preventing and treating damp and mould. • Meet the timelines for hazard investigation, tenant communication, remedial actions etc set out by Awaab's law. • Consistent practice for staff in treating damp and mould. • Reduce complaints from tenants. <p><u>It aligns with the council core commitment and priority in the following ways:</u></p> <ul style="list-style-type: none"> • Health: The policy aims to reduce the risks of damp and mould for residents which supports the council plan to help improve health and wellbeing. Improving the process should help to reduce potential health issues of damp and mould. • Improve condition of current housing. The policy intends to improve the condition of social housing stock and ensure homes meet decent home standard.

Step 2 – Gathering the information and feedback

2.1	What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights? Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.
Source of data/supporting evidence	Reason for using
Tenant voice group gave feedback and indicated that there were no major issues with the policy. General comments were considered in writing policy.	Tenant engagement is a good way to understand desires and opinions of tenants.

Step 3 – Gaps in data and knowledge

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3.1	What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.		
Gaps in data or knowledge		Action to deal with this	
The council is continuing to improve vulnerabilities and protected characteristics data for our tenants and residents, which will further support evidence of positive impacts and better identify the highest priority groups when addressing damp and mould		Proactive visits to tenants and other contacts are used to build this data record.	

Step 4 – Analysing the impacts or effects.

4.1	Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.		
Equality Groups and Human Rights.	Key Findings/Impacts	Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)
Age	Damp and mould can impact anyone regardless of age, but babies, young children and older tenants are more likely to be negatively impacted by damp and mould issues. The proposed policy aims to take a proactive approach to prevent and resolve issues of damp and mould, thereby	+	M

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	reducing the negative impacts on the health and wellbeing of these age groups.		
Disability	<p>People with respiratory problems, those with weakened immune system and those with existing skin problems are more vulnerable to damp and mould.</p> <p>Damp and mould can also have negative effects on mental health of tenants.</p> <p>The policy sets out the expectations how the council deals with damp and mould and should improve the service to reduce health impacts on all disabled tenants.</p>	+	M
Gender	The proposals do not relate directly to gender. There are no known implications related to gender.	0	L
Gender Reassignment	The proposals do not relate directly to those undergoing gender reassignment. There are no known implications related to gender reassignment	0	L
Marriage and civil partnership	The proposals do not relate directly to marriage and civil partnership. There are no known implications related to marriage and civil partnership.	0	L
Pregnancy and maternity	Pregnant women may be more likely to be impacted by the effects of damp and mould. The policy will improve council response to damp and mould issues and thereby have a positive effect on this group.	+	M

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Race	The proposals do not relate directly to race. There are no known implications related to race.	0	L
Religion and belief	The proposals do not relate directly to religion and beliefs. There are no known implications related to religion and beliefs.	0	L
Sexual orientation	The proposals do not relate directly to sexual orientation. There are no known implications related to sexual orientation.	0	L
Other Socio-economic groups including :	Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?		
Carer	The proposals will relate positively to carers for people with respiratory problems, those with weakened immune system and those with existing skin problems, who are more vulnerable to damp and mould.	+	M
Low income groups	The policy should benefit low-income groups by improving council response to damp and mould issues and providing advice. information and support where finance and fuel poverty are an issue..	P+	M
Veterans, Armed Forces Community	The proposals do not relate directly to veterans, armed forces community although they may fall into the groups above if disabled and/or	0	L
Other	None		
Impact on human rights:			

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List any human rights impacted.	A positive impact is anticipated on the right to adequate housing as the policy intends to improve quality of council homes by treating damp and mould issues appropriately. Standard of living may be improved as the policy intends to prevent and treat damp and mould issues in a timely manner.	P	M
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Use the following guidance to inform your responses:

Indicate:

- Where you think that the proposal could have a POSITIVE impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups
- Where you think that the proposal could have a NEGATIVE impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a NEUTRAL effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

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High impact (The proposal or process is very equality relevant)	There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.
Medium impact (The proposal or process is somewhat equality relevant)	There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or across services, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to make a contribution to promoting equality and the exercise of human rights
Low impact (The proposal or process might be equality relevant)	There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights

Step 5 - Mitigating adverse impacts and maximising positive impacts

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5.1	Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations?
No adverse impacts have been noted other than the need for appropriate resource allocation within Housing and Building Services teams, which is embedding in policy implementation plans.	

Step 6 – Recommendations and conclusions of the assessment

6.1	Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:
- No major change to the proposal – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review.	

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- **Adjust the proposal** – the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.
- **Continue with the proposal** (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty
- **Stop and remove the proposal** – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed.

Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.

Option selected	Conclusions/justification
No major change to the proposal.	The proposal demonstrates that the proposed policy is robust with no direct negative impact to individuals with protected characteristics. The policy should improve council performance in regard to damp and mould issues and have a positive impact on the groups highlighted.

Step 7 – Summary of agreed actions resulting from the assessment

7.1 What action, by whom, will be undertaken as a result of the impact assessment.			
Impact/issue	Action to be taken	Person responsible	Timescale
Data gaps for tenant vulnerabilities and protected characteristics	Proactive visits and other tenant contacts to be utilised to collect this data where tenants are happy to provide	Housing and Building Services teams	Ongoing

Step 8 - Monitor, review and improve

8. 1	<p>How will the impact of your proposal be monitored and improved upon going forward?</p> <p>Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?</p>
	<p>Performance monitoring is in place through monitoring of Decent Homes standard in this council's stock, essential repairs service response times, and tenant satisfaction.</p>