Housing Services

Pest Management Policy

Contents

1. Purpose 1
2. Scope 2
3. Our principles 3
4. Definitions 4
5. Risk-based triage and investigation 4
6. Treatment to individual properties 5
7. Block treatment 7
8. Preventative activity, access & pre-emptive proofing 8
9. Performance monitoring and reporting 9
10. Legislation and regulation 9
11. Equality, diversity and inclusion 9
12. Communication and consultation 10
13. Related policies 10
14. Reviewing this policy 11

1. Purpose

1.1 This policy supports our vision of creating thriving communities and homes that people are proud to live in by preventing, managing and reducing pest infestations across all properties that we own or manage.

1.2 It sets out how we will inspect promptly, repair promptly, communicate clearly, and coordinate effectively with residents and partners to achieve sustained prevention rather than purely reactive, one-off treatments.

1.3 We recognise that pest activity can be linked to disrepair, building defects, or wider household circumstances. We will “join the dots” between pests and any underlying issues, including repeated reports in the same block or locality, and act holistically.

1.4 Infestations may be considered alongside other habitability criteria (e.g., fitness for human habitation). We will conduct risk assessments that take into account the resident’s circumstances, including any vulnerabilities, to determine if a temporary relocation (decant) is appropriate.

1.5 The policy requires services to actively collaborate to eliminate the causes of infestations, thereby minimising the need for repeated interventions.

1.6 Lewisham Council ensures that a compliant and uniform approach is adopted to pest management, and the service delivered meets statutory requirements and is consistent with good practice. This includes but is not limited to:

- Environmental Protection Act 1990
- Prevention of Damage by Pests Act 1949
- Housing Act 2004 (HHSRS)
- Social Housing (Regulation) Act 2023 including Awaab's Law
- Homes (Fitness for Human Habitation) Act 2018
- Social Housing regulatory framework, specifically the Safety and Quality Standard requirements

1.7 A full list of relevant legislation and regulation can be found in section 11 of this policy.

2. Scope

2.1 This policy applies to the control of pests and the reduction of recurring infestations within properties directly managed by our Housing Services. This includes all our tenanted properties, including council-owned hostels. It also applies to communal pest infestations and block-wide treatments, including those involving leasehold properties. However, leaseholders remain responsible for pest treatment within their individual properties.

2.2 Effective pest management and control are the responsibility of residents, the landlord, and in certain circumstances, both parties. This policy aims to clarify roles and responsibilities in this respect. In doing so, it sets out what residents can expect from Lewisham Council's Housing Service, as well as what is expected from residents to help prevent and manage infestations.

2.3 For the purposes of this policy, the word 'pest' refers to an animal pest, including mammals, birds and invertebrates (principally insects), deemed to cause harm or nuisance to humans or residential property. Invasive vegetation is outside the scope of this policy.

2.4 We will investigate reports of pests in line with regulatory guidance.

2.5 We will commission treatments, where appropriate, in tenants' homes, hostels, and communal areas. Leaseholders may be included in block treatments and service charges may apply in accordance with the terms of the lease. We do not generally treat homes leased from private sector landlords unless they are included within a block programme.

2.6 If an infestation spreads into a leasehold property as a direct result of a structural defect in the building's exterior or common parts (which are maintained by the council), or due to an unaddressed issue originating in a council-managed space, we will investigate to determine liability for the rectification and treatment costs.

2.7 Pests normally considered for commissioned treatment include:

- Rats
- Mice
- Tropical ants (including Pharaoh ants)
- Cockroaches
- Bed bugs
- Any infestation likely to render a home unfit

2.8 Pests not routinely treated include:

- Pigeons (except where causing a communal nuisance)
- Foxes
- Field mice in external areas
- Garden ants
- Bees (we will seek beekeeper advice)

2.9 Reports of squirrels, pigeons or other birds in communal areas will be investigated and raised as a communal pest control job.

3. Our principles

3.1 When responding to reports of pest infestations we will:

- **Take all reports seriously -** We know that the presence of pests in resident's homes can cause serious distress and worsening of health outcomes. We will not dismiss reports of pests, and will ensure we investigate, keep an open mind about causes, and escalate appropriately, especially where there are multiple reports in a block/locality.
- **Take a risk-based approach focused on resident safety -** We will carry out a documented risk assessment, including residents' and their households' circumstances and vulnerabilities.
- **Give clear communication and timescales -** We will keep residents updated through the process (inspection, treatment steps, repairs, proofing), with clear timescales and next actions to manage expectations.
- **"Join the dots" -** We will correlate pest reports with disrepair, and with multiple reports in blocks/localities, triggering area wide investigation where patterns are suspected.
- **Not place the onus on residents -** While residents do play a part (e.g. access, housekeeping), we will not place the onus on residents to resolve infestations. We will investigate fully before deciding responsibility and will act where the landlord is responsible.

3.2 We are committed to working in partnership with other departments across the council including the specialist pest control team which delivers both block and individual pest treatments through its in-house pest control team. The Housing Service provides support, management, and communication to our residents, to ensure a resident-focussed, joined-up and efficient service.

Residents' Responsibilities

3.3 Our residents are key partners in helping us to control and reduce the incidence and spread of pests. Residents have a responsibility to maintain their property in line with the tenancy agreement or lease, and our stated policies. This includes taking steps to prevent pests including not engaging in practices that encourage them, dispose of waste properly, report repairs and infestations promptly, arrange for eradication treatments if needed, and allowing access to investigate or treat for pests where required.

3.4 Residents are expected to contact us as soon as practically possible after the discovery of a pest or infestation, to report the problem, and give as much information as possible, to enable measures which will reduce the risk of wider infestation.

4. Definitions

4.1 **Pest control -** the regulation or management of a species defined as a pest because it is detrimental to health, ecology or property.

4.2 **Pest (policy scope) -** animal pests (mammals, birds, invertebrates- principally insects) that cause harm or nuisance to people or residential property.

4.3 **Planned core block treatment -** pre-agreed programme for blocks with historic/persistent issues.

4.4 **Ad-hoc block treatment -** commissioned in response to several reports, usually after a block survey.

4.5 **Proofing -** preventative measures to stop pests entering or moving between units (e.g., sealing penetrations).

4.6 **Emergency hazard[1] -** An emergency hazard is one that poses 'an imminent and significant risk of harm' to the health or safety of the occupier in the social home. An 'imminent and significant risk of harm' is defined in the regulations as 'a risk of harm to the occupier's health or safety that a reasonable lessor with the relevant knowledge would make safe within 24 hours'.

4.7 **Significant hazard[1] -** A 'significant hazard' is one that poses a significant risk of harm to the health or safety of an occupier of the social home. A 'significant risk of harm' is defined in the regulations as 'a risk of harm to the occupier's health or safety that a reasonable lessor with the relevant knowledge would make safe within 15 working days'.

Legal context (summarised): A severe infestation may amount to a statutory nuisance (e.g. where repairs are needed to prevent ingress, or the home is unsafe), and domestic hygiene/pests can affect fitness for human habitation.

5. Risk-based triage and investigation

How to report an issue

5.1 To report a pest infestation problem within a home or block managed by Lewisham Council, contact the Estates Environment Team on 0800 028 2028 or via email at Estates@lewisham.gov.uk.

Triage

5.2 We will use a triage process and ask key questions to help us determine the type and cause of a pest problem and to help us understand the extent of any risk, including

whether it is classed as an 'emergency' or 'significant' risk[1]. This process includes consideration of any underlying vulnerabilities of the individual(s) in the property that may worsen the impact of the hazard, such as mental and physical health conditions, age and location of the hazard. If it is deemed an emergency or significant risk, then this hazard will fall under the scope of Awaab's Law and the applicable response timescales set out in Section 6 will apply.

5.3 The triage will also consider who is responsible for rectifying the issue (landlord/resident), whether there is any pattern of multiple reports to the block/locality and whether the report links to any related repairs.

5.4 Where pests are linked to defects, disrepair or building fabric issues, these will be dealt with in line with our Repairs Policy.

5.5 On receiving a report, the Estate Environment team will triage and arrange a timely inspection of the home and/or impacted areas, proportional to the severity and any vulnerabilities flagged.

5.6 Where a pest issue is identified through triage as a potential emergency hazard under Awaab's Law, we will investigate it within 24 hours of being made aware of it. An example of this would include pests actively contaminating food storage and preparation areas[2].

5.7 Where a pest issue is identified through triage as a potential significant hazard under Awaab's Law, we will investigate within 10 working days of being made aware of it. An example of this would include pests in the living area but not actively contaminating food storage and preparation areas[2].

5.8 For both emergency and significant hazards, a written summary of findings will be provided to the resident within 3 working days of the investigation including details of any hazard(s) identified, next steps, an anticipated timeline for further treatments/works, and a schedule of works.

5.9 If pest issues are triaged as neither emergency nor significant, they may be dealt with as part of our Planned Core Bock Treatment or Ad-Hoc Block Treatment programmes. Details of these can be found in Sections 7 and 8 of this policy.

5.10 An individual investigation into a pest issue may trigger a block survey or block treatment where a wider issue is identified.

6. Treatment to individual properties

6.1 The following section details our response to treatment in individual homes depending on different circumstances.

[1] Awaab's Law: Guidance for social landlords - Timeframes for repairs in the social rented sector - GOV.UK
[2] Awaab's Law Phase 2: Guidance to support triaging of hazards - GOV.UK

Emergency and Significant Hazards Pest Management Issues[3]

6.2 As outlined in the Triage section above, where a pest issue is identified as a potential emergency or significant hazard, we will investigate potential emergency hazards within 24 hours of becoming aware of them and potential significant hazards within 10 working days.

6.3 If the investigation confirms an emergency hazard, we will undertake relevant safety work as soon as reasonably practicable. Both the investigation and any make safe work will be completed within 24 hours of becoming aware of the hazard.

6.4 If the investigation confirms a significant hazard, we will undertake relevant safety treatment/works within 5 working days of the investigation concluding. A timeline for the completion of treatment/works will be detailed in the written summary report.

6.5 We will begin, or take steps to begin, any supplementary preventative work to prevent a significant or emergency hazard recurring within 5 working days of the investigation concluding, if the investigation identifies a significant or emergency hazard.

6.6 Where further supplementary treatment/works are required and it is not possible to begin them within 5 working days, we will start these as soon as reasonably practicable and within 12 weeks of the investigation concluding.

6.7 If the investigation finds a hazard that poses a significant, or a significant and imminent, risk of harm or danger, and the property cannot be made safe within the specified timescales above, we will use our temporary relocation process to arrange for the occupant(s) to stay in suitable alternative accommodation until it is safe to return.

6.8 Our response may combine targeted pesticides, physical proofing, repairs, and resident support/education. If treatments are ineffective after reasonable attempts, we may escalate the matter to specialist surveyors and/or adjust the treatment/repair strategy.

6.9 Where individual treatment is provided, recharges may apply; decisions consider circumstances, property condition, infestation level, and spread risk, with a focus on holistic problem solving and support. Any recharge will be in line with our Rechargeable Costs Policy.

6.10 If we believe resident actions (e.g. waste accumulation) may contribute to or hinder the resolution of, an infestation, we will identify this sensitively, explain what needs to change, offer support (including signposting and practical assistance where appropriate), and agree a time-bound plan.

Non-significant Pest Management Issues[3]

6.11 We will carry out an initial assessment to investigate the root cause.

6.12 We do not routinely fund individual treatments but will consider doing so in significant cases- especially where there is a risk of an infestation spreading- or where landlord

[3] As set out in Awaab's Law and HHSRS

repairs are implicated in ingress. We may also use discretion for other pest types in defined circumstances.

6.13 Notwithstanding the above, under the tenancy agreement we are responsible for keeping the home in 'good repair'. Therefore, if an infestation is deemed to have been caused by our failure to carry out certain repairs to a tenant's home, we may also be held responsible for the associated pest control. Likewise, where an infestation means the tenant's home is unsafe or 'unfit for human habitation' we may be responsible for arranging appropriate treatment.

6.14 We will consider commissioning treatments for individual properties for rats, mice pharaoh ants and cockroaches where, following an assessment, there is a significant pest problem, and the wider circumstances justify arranging treatment – such as preventing infestations from spreading. Suitably trained staff may also use their discretion to request assessments for other types of pests. Discretionary individual treatments apply only to Lewisham Council tenants and residents of council-owned hostels used for temporary accommodation, and not to leaseholders or tenants of other landlords.

6.15 Where individual treatment is provided, recharges may apply; decisions will consider circumstances, property condition, infestation levels, and spread risk, with a focus on holistic problem solving and support. Any recharge will be in line with our Rechargeable Costs Policy.

6.16 Our response may combine targeted pesticides, physical proofing, repairs, and resident support/education. If treatments are ineffective after reasonable attempts, we may escalate to specialist surveyors and/or adjust the treatment/repair strategy.

6.17 If we believe resident actions (e.g., waste accumulation) may contribute or hinder the resolution of, an infestation, we will identify this sensitively, explain what needs to change, offer support (including signposting and practical assistance where appropriate), and agree a time-bound plan.

7. Block treatment

7.1 Blocks with persistent/historic issues are included in the annual core programme, informed by data on pest type/volume, block structure and history; typical re-visits occur at 3-5 weeks intervals, adjusted by infestation type. Residents are notified of dates in advance.

7.2 Independent Living blocks remain in core programmes for mice, cockroaches and Pharaoh ants and are monitored for bed bugs due to their layout and design e.g. shared communal areas and laundry facilities.

7.3 Council-owned hostel blocks used for temporary accommodation are routinely monitored by our staff for signs and reports of infestation, due to shared facilities and potentially higher levels of occupancy turnover. Any required treatment is arranged on an ad-hoc basis as required.

7.4 Within the programme year, residents of blocks can access no-upfront-cost treatments for the included pests (service charge may apply).

7.5 Not all blocks that suffer with pest issues have an ongoing need for regular treatments. Properties which are not on the core block programme may be considered for an ad-hoc block treatment if a block wide issue is identified.

7.6 We may request a block survey to be carried out first before commissioning treatment to establish the type of pest and level of infestation within the block. We will act on the recommendations and advice from such a survey. This approach helps to ensure our decisions reflect wise use of funds and deliver value for money for services used.

7.7 If a block wide issue is identified, an ad-hoc block treatment will be arranged at no upfront cost to each resident. Such costs will be reflected in actualised service charges.

7.8 We may also raise individual treatments to contain spread while a wider programme is mobilised, at manager discretion under set criteria.

8. Preventative activity, access & pre-emptive proofing

8.1 As a responsible landlord, Lewisham Council has a duty to ensure that pest infestations are controlled in block situations and are prevented or restricted from spreading throughout the block, potentially impacting on neighbouring properties and areas that may not have been initially affected.

8.2 We will provide clear preparation and prevention guidance to residents and require access for inspections, treatments and proofing in line with notified programme dates (reasonable alternatives will be considered where they do not jeopardise programme efficacy).

8.3 We will give adequate notice to residents of an upcoming block treatment programme. Dates are arranged to support an efficient treatment programme. Residents are required to give access to all inspection or treatment visits allowing us to investigate and proof as part of such preventative activity. Under some circumstances we may be able to arrange an alternative date, if this is reasonable, without jeopardising the effectiveness of the program.

8.4 A responsible adult (over the age of 18), must be present to allow us access to the property when required. We will record the visit as ‘no access given’ where this is not the case. Where other routes have been exhausted, and/or where there is a statutory or regulatory requirement, or a health and safety reason for entering a property we will, where necessary, pursue legal measures such as obtaining a warrant to gain entry. However, enforcement action to gain access will usually be a last resort in line with our Required Access Policy.

8.5 We reserve the right to recharge the cost of missed appointments to residents who fail to provide access as part of a block wide pest control treatment programme, costs are shared with residents prior to treatment commencement. If this is required, we will do this in line with our Rechargeable Costs Policy.

8.6 Pre-emptive action: We will assess homes/blocks at higher risk (e.g. proximity to rivers/watercourses, drainage defects, known harbourage in communal voids) and conduct proactive proofing and maintenance to reduce likelihood and impact.

8.7 We are committed to a preventative approach to pest management. When undertaking repairs, maintenance, refurbishment, or capital works, we will assess and address potential pest vulnerabilities, including the installation of appropriate proofing measures where needed to protect residents and the condition of our homes.

9. Performance monitoring and reporting

9.1 We will provide residents with planned appointment dates, information on what to expect, any preparation steps required, details of follow-up visits, and target dates for any associated repairs. Where multiple visits are needed, we will explain why, what actions are needed, and when they will take place.

9.2 We will keep comprehensive records of reports, inspections, findings, photos, treatments, repairs, proofing and outcomes to avoid repeating ineffective actions and to inform learning and block wide decisions.

9.3 We will maintain end-to-end case records (report → triage → inspection → photos/findings → treatments/chemicals used → repairs/proofing orders → outcomes), and block dashboards to spot patterns and stop repeating ineffective actions.

9.4 We will hold regular multi-service pest reviews to refresh the core block list, update procedures, and share lessons from complaints/feedback. We will track budgets and actuals for transparency and value for money.

9.5 Lewisham Council's Housing Executive Team will monitor the delivery of this through key performance indicators including compliance with Awaab's Law.

10. Legislation and regulation

10.1 Relevant legislation, regulation and good practice includes, but is not limited to:

- Environmental Protection Act 1990
- Prevention of Damage by Pests Act 1949
- Health & Safety at Work etc. Act 1974
- Wildlife and Countryside Act 1981
- Housing Act 2004 (HHSRS)
- Social Housing (Regulation) Act 2023 including Awaab's Law
- Homes (Fitness for Human Habitation) Act 2018; and tenancy/lease provisions on access and waste
- Social Housing regulatory framework, specifically the Safety and Quality Standard requirements

11. Equality, diversity and inclusion

11.1 An Equalities Analysis Assessment (EAA) screening was conducted as part of the creation of this policy and concluded that the changes are expected to have a minor positive impact on all residents, including those with protected characteristics.

11.2 The policy sets out the range of support available to manage and reduce pest infestations across all properties we own or manage and will further demonstrate how

we are meeting wider legislative requirements such as Awaab's Law. This law aims to ensure that everyone lives in a home that is decent, safe and secure, and that landlords are held to account when this isn't complied with. The increased focus on timescales and placing the individual at the heart to consider the risks to them should have a positive impact all protected characteristics.

12. Communication and consultation

12.1 We will keep this policy available to residents through our website and will share additional information relating to preventing and identifying pests in other communications with residents – individually as a problem occurs, and more widely as appropriate.

12.2 We are continuing to widen the amount of training we offer staff – whether at a specialist level, or more widely to other staff to be able to identify and report possible pests proactively. We will make this policy and its procedures available to staff via our intranet.

12.3 The draft policy was informed by residents' views gathered through an online survey. It was subsequently consulted on through a resident workshop and a presentation at the resident-led Service and Performance Panel (SPP). This collaborative engagement provided valuable insights into current practices, key challenges, and opportunities for improvement.

12.4 The policy was developed in consultation with staff within the Housing Directorate and relevant corporate colleagues to ensure it is clear, deliverable and consistent with wider corporate goals.

12.5 Any complaints about the application of this policy will be managed in accordance with our Housing Services Complaints Policy and processes.

13. Related policies

13.1 Related documents which support and complement this policy include but are not limited to:

- Repairs Policy
- Damp and Mould Policy
- Required Access Policy
- Temporary Relocation (Decanting) Policy
- Compensation, Reimbursement, and Remedies Policy
- Housing Complaints Policy
- Rechargeable Costs Policy
- Disrepair Policy
- Antisocial Behaviour Policy
- Vulnerable Residents Policy

14. Reviewing this policy

14.1 Amendments to this policy not reflecting a major change of policy may be made by the Executive Director for Housing in consultation with the Director of Law and Corporate Governance. Such changes will be reported to Members annually.

Replaces: Pest Management Policy (April 2024) *Updates to reflect Awaab's Law Phase 2 requirements (V1.2)*	
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