



Pests and infestations policy  
2025 - 2028

## Version Control

Version	Revision Date	Author: Job Title	Change Description
1.0	September 25	Group Director of Property	New draft Policy
1.1	October 25	Group Director of Property	Resident consultation
1.2	November 25	Group Director of Property	Update Policy including resident feedback from consultation
1.3	November 25	Group Director of Property	Present to Executive Leadership Team seeking approval
1.4	January 26	Group Director of Property	Conclude consultation with residents
1.5	March 26	Head of Communication	Upload policy to website

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# 1. Purpose and scope

## Purpose

- 1.1. Our Pests and Infestations Policy sets out how we will effectively and efficiently respond to pests and infestations in homes and communal areas. It ensures we meet our legal obligations, our tenancy agreements, as well as the requirements of the Regulator for Social Housing (RSH).
- 1.2. The policy provides clarity about our role and responsibilities as a social landlord for responding to pests and infestations. Importantly, the policy reinforces how in attending to pest and infestation problems we protect residents' health and safety.

## Scope

- 1.3. The policy covers how we will be proactive to help prevent, identify and manage risks relating to pests and infestations in homes and communal areas. It sets out how we will:
  - Meet all applicable legislation and regulations, including our landlord obligations relating to housing fitness and health & safety hazards
  - Make sure our approach to dealing with pests and infestations supports our aim of providing homes that meet or exceed minimum Regulatory Standards, including the Decent Homes Standard and Consumer Standards
  - Provide a responsive, effective and efficient service to residents. This includes carrying out inspections and repair works where required
  - Effectively and sensitively manage customer responsibilities for resolving some pest and infestation issues
  - Monitor and evaluate our response to pests and infestations against targets and Key Performance Indicators.
- 1.4. The policy supports and complements our Repairs and Maintenance Policy as we seek to:
  - Maintain homes in a safe and decent condition
  - Meet our statutory and contractual requirements as a landlord
  - Meet the service standards set out by government and the Regulator
  - Achieve the service and quality standards we have agreed with customers.

The policy applies to all properties owned, leased or managed by emh Homes, including all homes and communal areas and emh Care and Support managed Homes owned schemes.

# 2. Background

- 2.1. We have a legal duty under the Homes (Fitness for Human Habitation Act) 2018 and other housing legislation to ensure that our homes are safe places to live in. We must ensure the condition of our homes does not put people at risk of physical harm or injury or seriously affect customers' health. We recognise that the presence of pests and infestations may put customers at risk so we will work with customers to ensure that these risks are managed appropriately. The Housing Health and Safety Rating System also details hazards that relate to domestic hygiene, pests, and refuse. It notes that poor housing design, layout or construction may make it more difficult for

customers to keep their home in a clean and hygienic condition so as not to attract pests.

2.2. We know that experiencing problems with pests and infestations can be very distressing for customers, partly because they can sometimes be difficult to resolve. Therefore, in our approach and responses to reports of pests and infestations we are committed to:

- Taking all reports of pest or infestation problems seriously and not being dismissive about them
- Not placing the onus on the customer to sort the problem. We recognise they may have a part to play, but may not be causing the problem, so we may need to investigate matters before deciding who is responsible
- Using inspections (sometimes by expert surveyors) where needed, then effecting timely repairs and carrying out pest control treatment in accordance with our defined responsibilities
- Supporting customers to resolve any issues or problems for which we determine they are responsible under our policy
- Involving and engaging customers in the design and operation of our response to pests and infestations to ensure we provide an accessible, accountable service that meets their needs
- Understanding and continually improving our performance in responding appropriately to pest and infestation problems.

### **3. Legislation**

3.1. It is critical that our response to pests and infestations complies with relevant legislation and regulations. Some of the main items of legislation include the:

- Homes (Fitness for Human Habitation Act) 2018
- Landlord and Tenant Act 1985
- Housing Act 2004
- Housing Health & Safety Rating System 2006
- Prevention of Damage by Pests Act 1949
- Public Health Act 1961
- Commonhold and Leasehold Reform Act 2002
- Environmental Protection Act 1990
- Health and Safety at Work Act 1974
- Workplace (Health, Safety and Welfare) Regulations 1992
- Provision and Use of Work Equipment Regulations 1998
- The Management of Health & Safety at Work Regulations 1999
- Control of Substances Hazardous to Health (COSHH) 2002
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Defective Premises Act 1972.

## 4. Attending to pests and infestations

### Definitions

- 4.1. We have developed a defined list of 'pests' that includes those listed in the guidance provided by the Housing Ombudsman. The pests are:
- Rats
  - Mice
  - Daddy long-legs
  - Silver fish
  - Cockroaches
  - Bed bugs
  - Fleas
  - Wasps
  - Pigeons
  - Squirrels
  - Ants
  - Moles.
- 4.2 Due to the vital role of bees in the pollination of crops and the serious decline in the UK's bee population, **we do not treat them as a pest.** [BPCA Beewise flyer 2018 WEBSITE VERSION.pdf](#) has more information behind this approach and useful contacts.
- 4.3 We may choose to act in response to different pests at our own discretion, including by having reference to our Vulnerable Residents Policy. When deciding what action to take, we will consider the nature and scale of the impact and the risks to customers and the properties we own or manage.
- 4.4 Pest problems may affect two distinctly different, defined locations. These are:
- Individual homes – defined as the part of a property over which a customer has exclusive use. This includes the inside of a dwelling, along with any ancillary spaces such as garages, sheds, gardens etc.
  - Communal areas – defined as communal corridors and stores, communal rooms or facilities, shared walls (internal/external), shared pipework and services, shared lofts, communal gardens, play spaces and car parks.

Our responsibilities and approaches to tackling problems with pests and infestations differs between individual homes and communal areas.

### Approach to pests and infestations in communal areas

- 4.5 As a landlord, we are responsible for keeping the exterior, external and internal communal areas of the properties we own and manage in a safe condition and in a good state of repair. Our Repairs and Maintenance Policy sets out how we will do this, by being proactive and responsive in identifying and remedying repairs. By providing an effective repair service and through well planned and implemented programmes of cyclical preventative and planned maintenance this should help reduce the potential for pest and infestation problems. This includes carrying out proofing and prevention measures as part of a proactive approach to reducing the potential for problems to occur.

- 4.6 If a pest problem is found or reported to us that relates to a communal area, we will generally carry out an inspection. We will then act on the findings of the inspection to carry out any necessary proofing or remedial repairs, along with treatments to resolve the pest or infestation problem.
- 4.7 Our response to reports in communal areas will be as follows:
- i. It will usually be necessary to carry out an inspection to assess the nature, extent and consequences of the problem, along with the potential remedy. A specialist pest control contractor may be asked to do this. The inspection will consider:
    - a. The type of pest and the nature of its activity (with reference to what emh defines as a pest)
    - b. The extent to which the pest is accessing an internal communal area and the potential need for repairs, or proofing/prevention works to prevent this.
    - c. The level of risk the problem is presenting to the property and occupants of the building.
    - d. The appropriateness of measures for eradicating the pest (e.g. by using poison, traps etc.)
    - e. Any role customers might need to take, such as stopping feeding pigeons, or properly managing and containing refuse.
  - ii. Carry out works or measures deemed necessary as determined by the findings and recommendations from the inspection.
  - iii. Advise the person who reported the problem, and, depending on the circumstances, a wider group of customers, the nature of the problem and what works or measures are being undertaken.
  - iv. Monitor the problem, including by seeking further notification by customers of ongoing issues.
- 4.8 The timescales for carrying out inspections and works will be those set out in the emh Repairs and Maintenance Policy.
- 4.9 Where a third party is partly or fully responsible for the management of pests in the communal areas of a block or estate, we will take steps to ensure that they carry out their obligations under any contractual agreement. Where necessary, we will act in line with this policy as if we are responsible for the communal areas, to safeguard our customers within that block or estate.

#### **Approach to pests and infestations in individual customers' homes**

- 4.10 The onus is on customers to manage and maintain the internal conditions of their home, with reference to items such as hygiene, cleanliness and proper use of windows and doors. Customers must also refrain from feeding feral animals and from storing refuse (especially food waste) in a way that could encourage vermin or other pests.
- 4.11 Our general approach is to support customers to be responsible for helping prevent, manage or resolve problems relating to pests and infestations in their own home. This

includes purchasing and using proprietary methods such as wasp nest killer, ant powder etc. or employing specialist pest control companies if needed. Many pest problems can be treated and resolved using items purchased inexpensively from a wide range of retailers and used in accordance with manufacturer's instructions.

- 4.12 However, from time to time, customers may experience problems with pests or infestations where we do need to take some or all responsibility for treating and responding to the problem, notably if it is caused or made worse by a problem with the design or condition of the property.
- 4.13 Therefore, if a pest problem is found or reported to us that relates to an individual home, we will respond as follows:
- i. Undertake an initial assessment of the nature and effects of the problem remotely, usually through a phone call discussion. In many situations this may be sufficient for us to provide the necessary support and advice for managing, treating and resolving the problem.
  - ii. However, sometimes, depending on the nature and impact of the pest or infestation problem, we may need to carry out an inspection to assess and diagnose in more detail the nature, extent and consequences of the problem, along with the potential remedy. We will also carry out an inspection if the issue could result from a problem with the building fabric, and/or the nature and extent of the reported problem could potentially be causing an emergency or significant health/hazard issue to the customer, and potentially neighbours. In some cases, a specialist pest control contractor may conduct the inspection. The inspection will consider:
    - a. The type of pest and the nature of its activity.
    - b. The extent to which the pest is accessing the home and the potential need for repairs, or proofing/prevention works to prevent this.
    - c. The level of risk the problem is presenting to the property, occupants of the home, and neighbours.
    - d. The need and appropriateness of measures for eradicating the pest (e.g. by using poison, traps etc.).
    - e. Any role customers might need to take, including stopping feeding pigeons, or properly managing and containing refuse.
  - iii. Following an inspection, we may decide that, in accordance with our policy, the customer is responsible for on-going treatment. We will only decide this if the inspection confirms that the infestation is not a result of a communal infestation, and is not caused by outstanding repairs, or faults in the fabric of the building.
  - iv. If repairs are needed, we will carry them out and, in these cases, carry out treatment measures based on the inspection recommendations.
  - v. We will provide appropriate advice and assistance on practical steps customers can take to manage a pest infestation in their home. We may also signpost customers to their local authority for further advice and assistance.

- vi. Advise the person who reported the problem, and, depending on the circumstances, a wider group of customers, of the nature of the problem and what works or measures are being undertaken.
- vii. Monitor the problem, including by seeking further notification by customers of ongoing issues.

## 5. Meeting the diverse needs of customers

- 5.1. At emh, we are committed to providing inclusive, equitable, and accessible services that are embedded throughout the customer journey. Our Inclusive Access Procedure supports the commitments in the Vulnerable Residents Policy and is underpinned by the Customer Data Management Policy and Process (in development). This ensures that reasonable adjustments are made proactively and consistently, enabling all customers to access services fairly.
- 5.2. If a customer or member of their household is less mobile (perhaps because of advanced age or a disability), the household contains a young child/baby or is otherwise 'vulnerable' then some types of pests and/or nature of the problem may place greater risks. We will identify these situations on the housing system and/or pick this up when the pest problem is reported to us. Further details on the service adjustments emh may make can be found in the **emh Vulnerable Residents Policy**.

## 6. Leaseholders and shared owners

- 6.1. Emh retains a range of repair and maintenance obligations for properties that have been sold as leasehold under the Right to Buy or Right to Acquire. These tend to be flats within multi occupancy blocks.
- 6.2. The terms of each lease will determine exactly which repairs we are responsible for, and which are the leaseholder's responsibility. In general, emh is responsible for repairing and maintaining the exterior and structure of the building, and any communal areas. This means that, ordinarily, pest problems found or reported in communal areas should be dealt with as per the requirements set out in this Policy for pests and infestations in communal areas.
- 6.3. Leaseholders and shared owners will generally be responsible for treating and remedying any pest infestations that do not result from any defects or repairs needed with the exterior or shared parts of the property. If a pest problem is reported to us that relates to an individual leaseholder's home, the onus will generally be for the leaseholder to resolve matters themselves. However, if the problem is being caused or made worse by a lack of proofing or repairs to the exterior of the property for which we are responsible, we will take responsibility for doing these works, as needed.
- 6.4. Our response to leaseholder problems will therefore be the same or similar to that set out above in our approach to pests and infestations in individual customers' homes.

- 6.5. The lease permits emh to charge leaseholders for the cost of carrying out necessary works, either through the service charge and/or a one-off charge. We will not usually undertake works that are a leaseholder's responsibility.

## **7. Third parties**

- 7.1. Sometimes, pests may originate from a property or dwelling occupied by customers who are not tenants or leaseholders of emh. Where the evidence suggests that a pest issue is originating from the home of a non-customer, we will notify the environmental health department of the relevant local authority and advise customers to do the same. If the pest problem progresses to the point of impacting communal areas under our responsibility and entering our customers' homes, we will act in line with this policy.

## **8. Decanting**

- 8.1. We will always prioritise the completion of proofing works and treatment programmes to ensure customers can remain in their home wherever possible. Where we decide not to offer temporary accommodation whilst proofing works or treatment are ongoing, we will keep this under review based on any new information relating to the scale of proofing works, or the ongoing level of infestation and risk to health.

## **9. Recharges**

- 9.1. We may need to charge customers for pest control work that we have had to carry out because the remedial actions fall outside of our responsibilities. In such cases, customers will be advised that the cost of the pest control treatment is rechargeable to them and advised of the repayment options available to them, including payment in instalments.
- 9.2. Rechargeable costs are those which:
- Have been incurred and become necessary due to neglect, carelessness or misuse or deliberate action on the part of the customer or any other individual knowingly allowed into the property
  - Are considered to be beyond normal wear and tear and/or where we have had to take action to prevent further damage or disruption to the property.
- 9.3. We will inform the customer as soon as possible if there is a recharge. Ideally, this should be when the matter is first reported, then followed up in writing (by email or letter), advising of the approximate value of the recharge. However, sometimes the nature or cause of the issue may not be diagnosed until the operative visits.
- 9.4. We will take a fair and consistent approach to rechargeable repairs and to recovering costs. Customer vulnerability and any safeguarding needs will be considered in our decision whether to enforce a recharge, and we will refer customers to our Money Matters service if inability to pay is identified.

## 10. Void properties

- 10.1. When a property is empty, we will inspect it and deal with any identified pest issues before re-letting the property. Carpets and/or fixtures and fittings will be removed where a reasonable risk of ongoing pest issues has been identified. The detailed arrangements for ensuring properties are relet in a clean and safe condition are set out within emh's Void Management Policy and Relet (Void) Standard.

## 11. Customer involvement and communication

- 11.1. It is important that tenants and leaseholders actively shape and influence our services. This will help us develop and improve a customer-facing offering. Not only is this good practice, but it ensures we meet the expectations of the Regulatory Transparency, Influence and Accountability Standard. This requires us to give genuine consideration of customers' views so they can be at the heart of different levels of decision-making about the delivery of our services.
- 11.2. The emh What Matters Framework places the customer at the centre of all our strategies, policies, and service design. It serves as our guiding principle - our 'north star' - to ensure we consistently focus on what truly matters to our customers.
- 11.3. We will engage with our involved customers, to ensure they:
- Have a voice and input to our approach to responding to pests and infestations so they can help make sure it is appropriately shaped around tenants' needs as customers
  - Have opportunities to question and discuss issues in relation to our approach, to help us continually improve and tailor service delivery.
- 11.4. We will communicate how customer views have helped shape and influence the development of our service. We will provide a copy of this policy on our website, and a dedicated website page on pests and infestations. We will also communicate it in our customer ezine and ensure it is highlighted at tenancy sign up.

## 12. Performance monitoring and accountability

- 12.1. We will monitor the application of this policy by regularly reviewing data collected by us and our contractor/s. We will use this data to ensure that the policy is applied correctly, and to decide on whether any policy amendments are required.
- 12.2. We will hold data that includes:
- Visit dates
  - Pests found
  - Complaints, and complaint satisfaction
  - Treatments/baits used and their location
  - Control of Substances Hazardous to Health (CoSHH) data
  - Recommendations to maintain the site as a pest free environment.

- 12.3. We will hold regular meetings to review the application of the Policy and the performance of our IMS and external contractor/s. We may make any necessary adjustments to the policy or procedure as necessary.

## **13. Continuous improvement**

- 13.1. We recognise the importance of ensuring continuous improvement. As we have decided to take a new approach to pest control management, we will comprehensively review our policy one year after initial implementation to ensure that we are achieving the desired outcomes for emh, tenants and leaseholders. Subsequent reviews will take place every three years, or sooner if there are any changes to legislation or good practice.

### **Colleague training**

- 13.2. We are committed to ensuring that colleague training supports the operation and management of our Pests and Infestation Policy.
- 13.3. To do this, we will ensure that all customer facing teams are trained in working positively with customers to:
- Determine the correct initial response to reports of pests and infestations
  - Provide appropriate advice to help them resolve matters themselves, where applicable
  - Organise and communicate works effectively and to secure access to carry out work, as well as correctly escalating cases in accordance with procedures.
- 13.4. We will ensure colleague are suitably skilled and qualified. We will ensure they receive suitable training in technical and contract management skills so that our maintenance arrangements are managed to maximum benefit for emh and customers.

## **14. Responsibility and review**

- 14.1. The Head of Strategic Asset Management is responsible for reviewing and implementing this policy.
- 14.2. This policy was first published on **DATE** and will be reviewed every year.