

Preparing for Awaab's Law: Progress by social housing providers

DECEMBER 2025



Contents

Section	Page number
1 Introduction	1
2 Summary	2
3 About our research	4
4 Overview of the findings	5
5 Policy and governance	8
6 Readiness and resources	11
7 Behaviour, communication and tenant involvement	15
8 Technology, artificial intelligence (AI) and data	19
9 Legal and access	21
10 The future: conclusions and recommendations	23
Appendix 1: Case studies	27
Appendix 2: Awaab's Law – a model for compliance	34
Appendix 3: List of sources	35
Appendix 4: List of acronyms and short forms	37
Appendix 5: Our approach to the research	38
The HQN research team	39

1 Introduction

Awaab's Law ([Hazards in Social Housing \(Prescribed Requirements\) \(England\) Regulations 2025](#)) came into effect on 27 October 2025, in the first of three phases. It heralds new obligations on social housing providers and new rights for tenants. Our research provides a snapshot of how providers were preparing for the new law, just ahead of its implementation. It also includes views from residents, including some who are involved in the governance of their landlords.

Our research is timed to capture lessons from the immediate run-up to implementation of phase one of Awaab's Law, which covers two issues:

- Damp, mould and condensation (DMC)
- Emergency and significant hazards.

The requirements within the first implementation phase on tackling DMC have rightly been widely publicised. The requirements to deal with **all** emergency hazards that present a significant risk of harm to tenants are equally important. The list of hazard types covered in the following phases (exact dates to be announced) is:

2026:

- Excess cold and excess heat
- Falls associated with baths, etc, on level surfaces, on stairs and between levels
- Structural collapse and explosions
- Fire and electrical hazards
- Domestic and personal hygiene and food safety.

2027:

- All remaining Housing Health and Safety Rating System (HHSRS) hazards (apart from overcrowding) where they present a significant risk of harm.

We have highlighted innovations and good practice throughout this report that can help providers to meet the new challenges. In the final section we look to the future, highlighting what providers see as the main issues for the coming years and offer experience-based recommendations for changes that could help providers deliver high quality services to their tenants in compliance with the new requirements.

The Housing Ombudsman Service (HOS) has written extensively on the topics of damp and mould, repairs and complaints. Its Spotlight report on repairs and maintenance – '[Repairing Trust](#)' – gave four key recommendations to social landlords:

- 1 Cultural shift: the report advocates for a cultural transformation within the sector, calling for empathetic communication and transparency. Landlords should treat residents as individuals deserving of a safe home. Language plays a key role, including avoiding impersonal language such as 'stock' and 'decants' when speaking to residents. Human-centred services that treat residents with respect and dignity is recommended.
- 2 Predictive maintenance models: transitioning from reactive to predictive maintenance models can greatly enhance efficiency and service quality. By anticipating issues before they escalate, landlords can provide more timely and effective repairs.
- 3 Strengthening relationships: modernising and improving relationship management with both contractors and residents. Stronger partnerships will lead to better communication, quicker resolutions and a more satisfactory experience for all parties involved.
- 4 Code of conduct: creating and promoting a code of conduct for all staff and contractors entering residents' homes. This code would set clear expectations for behaviour and communication, further building trust and accountability.

Another HOS report, '[Learning from Severe Maladministration](#)' (October 2025) focused on damp, mould and condensation and Awaab's Law compliance. It said:

- Landlords must take any household circumstance into consideration. They must prioritise investigations and repairs as a result
- Poorly handling access can prolong poor living conditions
- A landlord's internal complaints procedure can play an important role in resolving an issue for a resident and for the landlord to learn
- Landlords should be aware of obligations under Housing Health and Safety Rating System. Where a potential hazard is identified, landlords must conduct inspections
- While some actions such as inspections and acknowledgement of issues can be done well at the start, the action must be followed through. The experience of the resident can deteriorate over the course of a repair.

Our research, including surveys, focus groups, events and case studies, has been conducted against this backdrop and has been informed by existing good practice in repairs, complaint handling, asset management and housing management.

2 Summary

Most organisations have stepped up to meet the challenge and deadlines on Awaab's Law for this first year of implementation, including revamped systems and response times. Some have been highly proactive on damp and mould since the measure passed in Parliament in July 2023 and have not waited for national legislation and regulations to come into force.

Many have involved residents in the planning and run awareness campaigns.

Policy and governance

- Organisations are setting up specific reporting systems for Awaab's Law compliance
- This includes upward reporting and escalation to governing body level
- Metrics and key performance indicators (KPIs) have been devised
- Some are making a direct link between Awaab's Law, risk, health and safety and satisfaction data.

Readiness and resources

- Staffing, training and attitude change are seen as crucial
- Most providers – and smaller landlords especially – struggle with funding and recruitment of technical specialists (particularly building surveyors with HHSRS familiarity and specialist contractors)
- Achieving coordination across the organisation is seen as a challenge
- Some organisations are actively seeking better information on stock condition, to anticipate problems or detect them earlier.

Culture, communication and tenant involvement

- Most organisations are striving to bring about a culture of respect and individual response
- Most are using a variety of channels to inform tenants of their new rights and to raise awareness of the dangers of DMC
- Some are offering advice on managing the home environment to prevent DMC. Home sensors are also coming into use. Both of these are seen as empowering residents
- Some are involving tenant panels/groups to refine the service offer.

Technology, artificial intelligence (AI) and data

- There is greater use of dashboards, apps and linked systems
- Concerns remain over data reliability and integration across the organisation
- There are moves toward better asset management/stock condition data and analysis for the long term.

Legal and access

- There are concerns over ambiguity in guidance and the general complexity of the legal situation
- 'No access' is a concern, particularly with the increasing regulatory requirements
- Some organisations are moving to deal better with disrepair cases.

3 About our research

Our project was commissioned by the National Federation of ALMOs (NFA), Councils with ALMOs Group (CWAG), Local Government Association (LGA), Chartered Institute of Housing (CIH) and Association of Retained Council Housing (ARCH). These organisations represent the majority, if not all, of stock-holding local authorities and arm's length management organisations (ALMOs). The brief for the research asked us to focus on the experiences of local authorities (LAs), ALMOs and their tenants, but also to include housing associations (HAs) as they face the same issues around Awaab's Law and could contribute good practice.

Our approach included a brief desktop review of previous research and documentation, a survey of LAs and HAs, a series of focus groups involving staff, residents and governing body members, related meetings and a series of case studies with LAs, ALMOs and HAs. Field work was conducted during August, September and October 2025, immediately before Awaab's Law came into effect.

More details of our approach can be found in Appendix 5. We are grateful to all those who took part in the research and to the project steering group for advice, contributions and contacts.

The Housing Health and Safety Rating System

The HHSRS is a tool for local authority and other professionals to use in assessing health and safety risks in residents' homes. As part of the Housing Act 2004, it requires LAs to assess potential harm to the people living in the home, rather than being based on a fixed standard. Both the exterior and interior of the home are inspected for deficiencies that could give rise to a hazard to the occupants. Types of hazard are set out in guidance.

The HHSRS requires assessment of the severity of a risk by considering the likelihood of harm to the occupants within the next 12 months. There are special rules for HMOs.

Each home inspected is given a score, which translates in to a hazard band from A to J. Band A-C hazards are the most serious and are termed category one. All others are termed category two.

Local authorities are required to take enforcement action to remedy the most serious hazards (category one) within set timeframes and may take action on category two hazards, which are less serious.

Awaab's Law, implemented from 27 October 2025, strengthens the requirements on all social housing providers. They must assess and take action on potential hazards including DMC and emergencies within fixed timeframes. The requirements will be extended in 2026 and 2027.

4 Overview of the findings

We found in our research that most organisations have stepped up to meet the challenge and deadlines on Awaab's Law for this year.

Survey responses

When the survey was being run (August–September 2025), two thirds of respondents were on track to meet the deadline, while less than 10% reported that they would struggle to meet the deadline (see Figure 1). Some have been highly proactive on damp and mould since the measure passed in Parliament in July 2023 and have not waited for national legislation and regulations to come into force – 11% in our study had already implemented and were testing their systems. While it is excellent that some organisations have achieved this (and see our case studies for examples), ideally more would have reached this stage shortly before the implementation date. Many providers have revamped their systems and response times. Many have involved residents in the planning and run awareness campaigns.

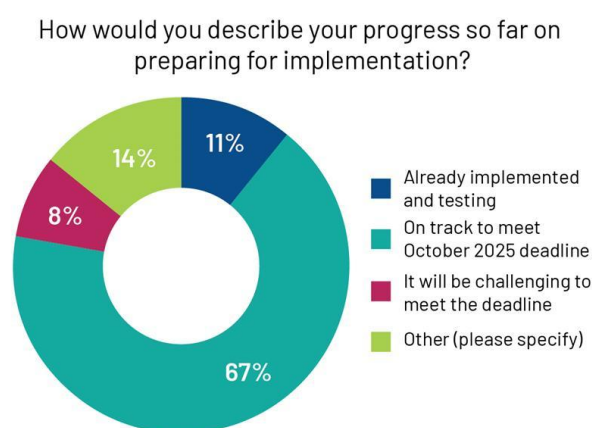


Figure 1: Progress on preparations for implementation

That said, significant challenges remain. Comments under 'other' on Figure 1 included changes needed because government guidance only appeared in July 2025, extra complexities on 'all emergencies' responses from working with subcontractors, having to use manual systems for data handling and reporting, problems standardising summaries to tenants across different subcontractors and concerns that resources may not keep up with new procedures.

It was not always clear to what extent participants were responding mainly or only to DMC obligations in this first year (a minority mistakenly appeared to believe that duties covering other emergency hazards in areas such as electrics would only come into force in subsequent years). There was certainly a focus on DMC but a significant number are reviewing systems across the board, in anticipation of future requirements under Awaab's Law.

Among the problems are:

- Data systems, especially systems that connect across the organisation
- Resources are limited
- Staffing, particularly lack of qualified technical people such as surveyors
- Gaining access to survey or complete repairs (and see our linked report on this topic)
- Some aspects of the new law and guidance are unclear
- Achieving culture change across the organisation may be challenging
- Challenges around moving people out and finding suitable accommodation quickly.

Commonly cited priorities from focus groups and surveys:

- Strengthening internal coordination and culture change
- Improving communication and tenant trust
- Investing in IT tools and training
- Finding enough resources in both stock investment and staffing.

Our four case studies highlight these problems and priorities in more depth. Each provider has worked over the last two years to improve processes around DMC and repairs, putting them into a better position to be ready for the demanding timescales involved in Awaab's Law. The full case studies are detailed at the end of this report. In brief:

East Midlands Housing Group (emh)

emh has taken a proactive approach on damp and mould over the last three years. A dedicated in-house team was set up to focus on diagnosis and treatment, replacing its reliance on contractors and subcontractors. Some 64% of cases of damp and mould are now achieving a first-time fix. The remaining cases involve an investigation of the root causes and in-depth remediation to the building fabric. emh introduced a pre-emptive approach where DMC cases have been found in properties in specific streets or similar property types. Other households are contacted and asked whether they also have problems. This approach has helped customers who had remained silent because of perceived stigma in reporting DMC. The resident scrutiny panel has played a significant role in producing reports to address DMC.

Homes in Somerset

The ALMO recognises that many tenants are struggling with the cost of living and are unable to heat their homes. DMC problems already had relatively high priority and there is a long-standing policy of carrying out initial inspections within 48 hours and undertaking work within seven days. Now a special team is bringing even greater focus to tackling reported problems within required timescales. There is a high level of scrutiny from senior management, the board and the Council.

Kirklees Council

Firm, coordinated action by the homes and neighbourhoods department has seen a backlog of DMC cases cleared and open cases dramatically reduced. A customised case management tracker ensures that every case is properly logged and actioned. The department has trained up its staff on DMC prevention and surveyors are being trained in HHSRS and Awaab's Law requirements. A "no-blame" culture has been embedded, focusing on resident wellbeing and communication. Two self-assessment exercises have tested the department's response against the Ombudsman's Spotlight report on DMC, helping to iron out any problems.

Stoke on Trent City Council

A public campaign on 'zero tolerance' of DMC issues kickstarted the Council's work on Awaab's Law in earnest. All those reporting problems were visited, given advice and had repairs arranged. Now a task force oversees its work on Awaab's Law and is tracking its response and compliance during implementation. The task force led a full end to end run through of the department's systems with role play for staff. The test included a range of scenarios – mostly around DMC, but also other HHSRS hazards. A shift in culture aims to put the relationship of housing officer and tenant at the centre, with services built from there. This includes involving other Council departments such as social services, so that staff know where to report anything amiss when they visit a tenant's home.

In the following sections we examine our findings in more detail, under five headings. Each section includes changes that providers are making to meet the challenges of Awaab's Law compliance.

5 Policy and governance

- Organisations are setting up specific reporting systems for Awaab's Law compliance
- This includes upward reporting and escalation to governing body level
- Metrics and KPIs have been devised
- Some are making a direct link between Awaab's Law, risk, health and safety and satisfaction data.

Most participating organisations had set up specific reporting arrangements for Awaab's Law. These were at various levels. Commonly cited arrangements included:

- Daily reporting of cases into a dashboard, with updates on investigations and responses
- Monthly reports to senior management and shared with contractors
- Some also reported monthly to LA portfolio holder, cabinet/board and some committees such as health and safety, scrutiny
- Quarterly reports to cabinet members, committee/board (if not monthly) and variety of committees, eg, Housing Revenue Account (HRA) governance group and tenant panel, governance and audit committee, damp and mould panel, resident services improvement group
- Meetings with tenants through wider tenant engagement processes, such as focus groups, panels, etc
- Risk registers reviewed 'regularly'
- Quarterly reporting to a local partnership board.

"Residents' feedback and complaints data are incorporated into board reports. Health and safety remedial actions are tracked and escalated where needed. The board is expected to monitor compliance with consumer standards, including damp and mould times under Awaab's Law."

- Survey respondent (HA)

Most respondents said they have KPIs in place, with dashboards or similar to ensure live tracking on a daily basis. Power BI was mentioned specifically to create dashboards.

Specific KPIs adopted included (four examples from different survey organisations):

- *% investigations performed within target timeframe*
- *% investigation written summaries sent within target timeframe*
- *% repairs commenced within target timeframe*
- *% repairs completed within target timeframe.*

Broken down by emergency, severity and hazard type.

- *Number of jobs*
- *Numbers inspected/completed within the target time (including broken down into the job priority level)*
- *Total inspections in month*
- *Number and percentage of inspections that are 'no access'*
- *Total work orders completed in month*
- *Number of formal complaints about DMC*
- *Tenant satisfaction score for damp and mould repairs for the month.*

"Number of repairs and urgent repairs completed on time. We also have KPIs based around the number of DMC cases we have open, average length of time open for, number of new cases and the number of completed cases."

A suite of metrics to evaluate longer term impact over time still needs further consideration but may include:

- *Enhanced Tenant Satisfaction Measures and feedback*
- *Responsive repairs demand and expenditure*
- *Volume of complaint escalations and legal disrepair claims*
- *Volume of repeat damp and mould cases by severity*
- *Volume of hazards by severity identified through stock condition programmes*
- *Energy performance metrics*
- *Volume and resolution times for non-decency.*

See also our Awaab's Law compliance KPIs document at Appendix 3.

What's new

Creating a dashboard reporting system specifically for Awaab's Law compliance is clearly new. Most organisations appeared to have set up this type of system and were already testing it out and establishing the protocols both for regular reporting and for escalation where needed.

Reporting to senior staff, governing bodies and in some cases tenant panels is designed to embed reporting into the existing structures of responsibility. Some organisations specifically mentioned integrating Awaab's Law data reporting into existing systems on risk, damp and mould and health and safety.

"We have scheduled an internal audit by our third party auditors to review our approach; this will consider the effectiveness of the controls we have designed and their operation."

- Survey respondent

Some organisations are directly linking performance on Awaab's Law with customer satisfaction data.

"Monthly KPIs on ... the number of formal complaints about damp, mould and condensation and the tenant satisfaction score for damp and mould repairs."

- Survey respondent

"A structured approach to evaluate the impact of compliance and improvement measures under Awaab's Law, focusing on transparency, tenant engagement and performance monitoring with KPIs."

- Survey respondent

Some of our case study providers had revamped their policies and procedures or introduced new Awaab's Law-specific ones that ensure cases are followed through properly. This involves checking back with tenants months after an issue has been resolved, to find out whether the problem has returned or whether any new issues have arisen. As well as dealing with recurring hazards, the response can include action on fuel poverty, for example.

6 Readiness and resources

- Staffing, training and attitude change are seen as crucial
- Most providers and smaller landlords especially, struggle with funding and recruitment of technical specialists (surveyors, contractors)
- Achieving coordination across a local authority is seen as a major challenge
- Some organisations are actively seeking better information on stock condition, to anticipate problems or detect them earlier.

Survey responses

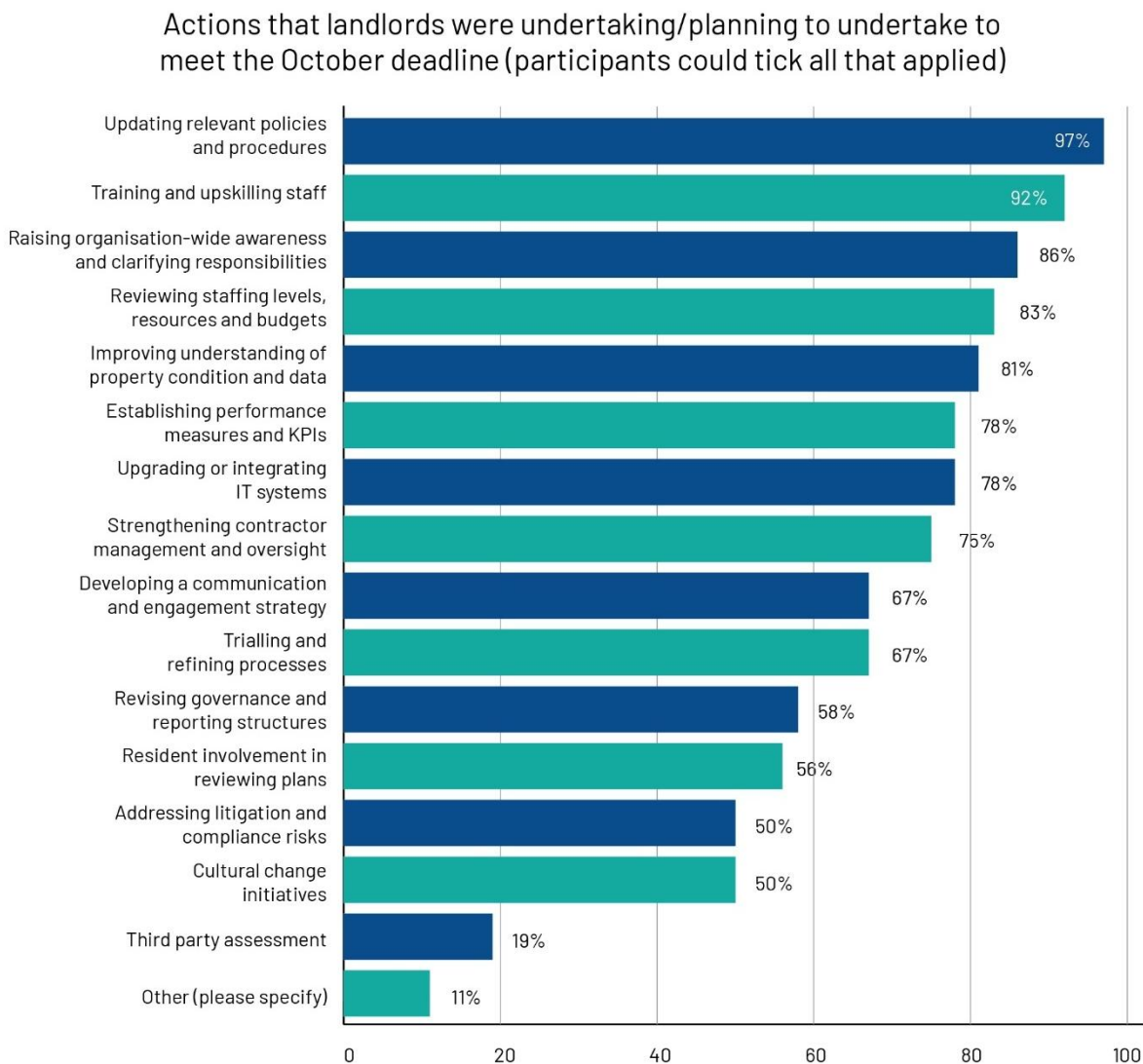


Figure 2: Actions taken or planned to meet the October deadline

Almost all survey organisations were updating their policies and procedures (see Figure 2). Training and staff awareness also featured strongly in preparation actions. More than three quarters of organisations were refining their systems, reviewing resources and establishing performance measures. Similarly, most were trying to gain a better understanding of property condition and data (more about this below). Although only half ticked to say they were taking initiatives on culture change, it was apparent from the study overall that this is something many organisations and their staff are working on.

There was also evidence of closer working with contractors than in the past. Here, part of the challenge was to ensure consistency of approach. In a small number of cases the organisation has decided to bring its repairs and/or DMC response back in-house, in order to be better able to control and direct the process.

Responding quickly and accurately to the first report of a potential hazard under Awaab's Law was seen as crucial. Therefore providers were upskilling call centre staff and encouraging residents to use photos/video to enable accurate assessment. In our research, around two thirds of tenants said they were willing to do this. Triage arrangements were in place at the majority of organisations.

Many organisations reported however that they were struggling to recruit enough trained specialists such as building surveyors or contractors with HHSRS experience, who could establish the severity of cases.

“Reshaping the approach within our repairs service/specialised damp and mould team presented an initial challenge as the new legislation required significant changes to ways of working.”

- Survey respondent

“Developed bespoke process maps so that at every point which touches an employee – they should know what to do at that point. Run the training again a few weeks beforehand and then again after it starts.”

- Meeting participant

Ensuring compliance across a local authority was seen as a major challenge. Most of the participating organisations had reviewed their policies on repairs, DMC, complaints, access and other related matters to ensure they were still fit for purpose and most were trying to bring together housing management, asset management and other teams for seamless working – something that has long been both a goal and a challenge. A survey participant said the organisation had brought in a new DMC strategy to focus limited resources where they are most needed.

However, the complexities multiply when other council departments are brought into view. Social services teams in unitary and county councils, for example, may well have contact with tenants, as might staff from other departments and ward councillors. All staff who might visit tenants need to be made aware of Awaab's Law and its requirements, so that they can help with spotting problems and potentially supporting housing staff to gain access to the homes of tenants with particular needs. These staff and local councillors also need to know where to report any issues and to be aware of the need for prompt reporting. See our case study from Stoke City Council for an example on this point.

In addition, councils and their ALMOs need to ensure that actions, reporting and governance are effective across both linked organisations. Where legal action is required, joint working is essential.

Other challenges mentioned included estimating the resource requirements of compliance and developing an appropriate framework for monitoring ongoing cases through to conclusion. Perhaps surprisingly, only about one in five survey organisations had used third party assessment or audit of their approach. This would be another opportunity to test readiness.

“Short timeframes to implement new policies and procedures which are different to existing contractual terms and conditions.”

- Survey respondent

“Some hazards cut across multiple teams, clear and consistent processes and reporting mechanisms need to be implemented.”

- Survey respondent

There was also active intervention on stock condition, taking a longer term view to prevent emergency issues arising. In some cases this was specifically linked to 'net zero' and Decent Homes Standard investments. But again, limited resources for investment were cited as a hindrance. Many councils and ALMOs have older stock that presents difficult problems of structure and thermal efficiency.

“Collaboration with sustainability team and placement of sustainability manager within the repairs and maintenance team, to identify and implement energy improvement strategies within responsive and planned works programmes, eg, to reduce fuel poverty.”

- Survey respondent

“Learn from the data we hold, we are currently mapping out archetypal defects which affect thermal efficiency and plan on using this to feed into our investment plan.”

- Survey respondent

What's new

Awaab's Law has brought a new focus on several related areas of operations. There is of course a strong emphasis on DMC and also on dealing quickly and effectively with reports or complaints, ensuring the repairs service is able to respond correctly and getting the crucial initial response right. It is clear that some organisations have pre-emptively taken action in recent years to 'up their game' in delivering better services, ahead of the legislation.

Measures taken specifically to meet the new Awaab's Law duties included:

- Staff training, eg, on HHSRS and vulnerability
- Drawing in other departments and alerting their staff to the new requirements
- Toolbox talks
- Triage arrangements – using the existing call centre or a newly formed centralised team
- More use of photos and video
- Damp and mould first aid kits made available to clean small areas
- Summary proformas
- Summary emailed (where possible) or given to tenant whilst surveyor still on site
- Ability for surveyor to book appointments to complete the work while at the tenant's home – allows mutually convenient appointments.

There is evidence of some organisations looking more widely by actively seeking out DMC cases where there have been reports in the neighbourhood, or where tenants have for any reason had DMC in their home but not reported it. Similarly, many are looking to the longer term with stock condition surveys and asset management strategies derived from the findings.

“Finding cases previously not reported”

- Survey respondent

“We are committed but we need the resources to match the ambition, eg, recruiting skilled staff for inspections, emergency repairs and tenant support; smaller or rural schemes may struggle to meet 24-hour hazard response targets without additional funding, shared services or regional partnerships.”

- Survey respondent

“We have restructured our new repairs and maintenance contract to include data analysts to provide insight on our properties and identify works.”

- Survey respondent

7 Behaviour, communication and tenant involvement

- Most organisations are striving to bring about a culture of respect and individual response
- Most are using a variety of channels to inform tenants of their new rights and to raise awareness of the dangers of DMC
- Some are offering advice on managing the home environment to prevent DMC. Home sensors are also coming into use. Both of these are seen as empowering residents
- Some are involving tenant panels/groups to refine the service offer. In our focus groups we heard the message that landlords should *“take tenants seriously, treat them with respect and listen to what they are saying”*.

The Ombudsman reports 'Repairing Trust' and 'Spotlight on Damp and Mould' made strong recommendations on organisational culture. In fact, the HOS believes the necessary changes in practice must begin with a change in attitudes.

It is clear from Ombudsman reports that there is a distance to travel in achieving behaviour change across the social housing sector. In the case that led to Awaab's Law and in HOS reports there have been incidents of prejudicial comments about the lifestyle of tenants. It was also apparent from some tenants' responses in our study, for example, that there remains a lack of trust.

But our study suggests that providers are striving to bring about a culture of respect for residents and that many are investing in training and awareness to support an approach and behaviours that foster trust. We found a distinct shift away from 'efficiency' in transactions with tenants toward an approach that is based more in coming to understand individual residents' needs and wishes. This was mainly based around building relationships with people who are known to have a vulnerability or who have come to the provider's attention for a particular reason such as complaints or not allowing access. One participant commented that they were trying harder to understand tenants and know who is living in their properties. They felt that Covid had "left gaps in things like tenancy audits" and they needed to get back on track.

Another aspect of the shift in culture and behaviour was in how providers respond to service requests in general, as well as under Awaab's Law. A number were striving to make it easier to book, change or cancel appointments and some were offering more specific appointment times. In this regard, a change of behaviour also needed to extend to contractors and operatives working with providers.

"Moving away from all-day appointments to implementing specific appointment times slots for damp and mould inspections and jobs that are appointed when the tenant contacts us to report an issue. This has significantly reduced the proportion of 'no accesses', which is better for customers and operatives. A script has been introduced and training provided that allows the customer contact team to triage and book inspection appointments. This means appointments are booked more promptly, without the need to refer the case to the healthy homes team administrator."

- Survey respondent

"Vision – we want to make sure [staff] have the proactive customer insight. That customers have the same service regardless of how the [problem] is identified or reported. That there are embedded processes, qualified respondents, that information is in plain English – moving from the responsive system to the proactive system."

- Meeting participant

This wider approach is in tune with findings from a meeting with residents in our study. The residents were more interested in the post-2025 implementation of Awaab's Law because while DMC was seen as important, they felt there were also other longstanding structural issues with their homes to be tackled. Some providers did raise the issue that much of the stock is ageing and some will be difficult to bring up to standard.

Communications and involvement

There was a variety of approaches and levels of effort in communicating with residents about Awaab's Law. Some said they were alerting tenants to their new rights, but at the same time felt uneasy as this might bring about a wave of new reports and complaints.

Some organisations are simply publishing their new policies/procedures on the web and notifying tenants of any handbook changes. This was very much the minority, however.

Most are using all their normal channels – tenant newsletters, leaflets, social media, rent accounts, etc to alert and inform residents. That goes all the way up to about two thirds of survey respondents having a full communications strategy (see Figure 2). Some are taking the opportunity to do widespread consultation with residents, including workshops and focus groups, which can both inform them and seek their views. Some have involved resident scrutiny panels or resident groups to share progress and garner ideas. Some were engaging with tenants to develop plain English summaries of communications and advice. However, only 58% of organisations in our survey said they had involved residents in reviewing their plans. All organisations should have a communications strategy and should seek input from residents.

One respondent mentioned new scripting for call centre staff when people are reporting DMC and another is training customer facing staff to relay key messages. Many are encouraging tenants to send photos/video of the problem they are reporting, to aid accurate diagnosis. A few organisations have produced their own guides on controlling DMC.

Nova Surveyors have produced a [tenant awareness and early reporting campaign resource](#).

“Engagement with customers to inform the content of our new policy means it is tailored to their expectations around communication, as well as meeting the statutory requirements.”

- Survey respondent

“We’ve spent time refocusing the culture around damp and mould, ensuring the key messages are not around tenant responsibility or lifestyle choices, but support with addressing underlying issues. This has included communications and training internally. We’ve worked to strengthen our approach to meeting the needs of vulnerable tenants and have made some changes to ways of working to ensure we robustly capture and understand the impact of vulnerabilities through our process, including when someone calls to report an issue and/or through our resident liaison officers within the specialised damp and mould team. This has helped us to ensure we respond to household needs in the prioritisation of jobs.”

- Survey respondent

There was extra support for tenants in managing their home environment, including use of environmental sensors, money advice and helping with insulation. Some organisations were trying to increase awareness of any assistance available with the cost of living and to reduce stigma among tenants so that they were encouraged to report problems.

“Damp and mould action plan – tenant engagement and empowerment via the damp and mould guide, hands on workshops and support packs, enhanced support via the tenant first team, prioritisation for vulnerable households.”

- Survey participant

What's new

Providers are moving toward what some might say is an overdue recognition that they must offer highly responsive systems that work for tenants, coupled with empathy and personal service. Two unitary authorities in our study had taken the opportunity to educate staff from other departments such as social services, who might have contact with tenants, on noticing problems like DMC and how to report any concerns.

There is a new willingness to seek views and experiences from residents who may not have previously reported problems, especially with DMC. Similarly, organisations were no longer assuming that problems were resolved if there was no further report: some are actively returning to ask tenants what has happened since.

Here is one example from the survey:

- *“Proactive visits to recently let (within 12 months) properties to understand property condition and resident circumstances such as vulnerabilities*
 - *Follow ups with tenants within 12 months of a report of damp and mould*
 - *Monitoring of repeated reports of damp and mould in the same property or within the same block to proactively take action to resolve*
 - *Proactively reaching out to vulnerable residents during severe weather emergency protocol (SWEP) to ensure they have the support they need to adequately heat their homes during adverse weather*
 - *Complaints and tenant satisfaction monitoring, especially in relation to proactive communication.”*
- **Survey respondent**

8 Technology, artificial intelligence (AI) and data

- There is greater use of dashboards, apps and linked systems
- There are concerns over data reliability and integration across the organisation
- Organisations are moving toward better asset management/stock condition data and analysis for long term.

Technology was seen as crucial to delivering results on Awaab's Law compliance, but also a key factor in problems with meeting the new demands. Many organisations are struggling to integrate information technology (IT) systems across the whole organisation and to share appropriately with contractors. In addition there are problems in keeping data on resident vulnerabilities up to date and appropriately shared. There were many calls for a dedicated IT system for reporting, tracking and monitoring both individual cases and the organisation's overall compliance. Nonetheless one of our case studies, Kirklees Council, created a highly effective bespoke DMC case management tracker using Excel.

Some organisations were moving forward on IT. The most commonly cited dashboard generating program was Power BI and this could be used to sit over existing systems. Some had surveying software (including CAD) but there were calls also for something updated on this, to include producing reports and writing specifications.

Other mentions included:

- Setting up a dedicated app for the investigation of DMC and associated works
- Planned maintenance workers being required to check for other problems like DMC during visits and to photograph and report back
- Handheld devices able to provide the tenant with a summary while on site
- Introducing the new DMC portable app – streamline time, instant reports for tenants
- CSAT survey feedback.

There was a drive to gain and especially use better stock condition data, to help shape strategy and focus on problematic stock types. A number of organisations are investing in or trialling in-home sensors that report remotely to aid detection of DMC, low temperatures and humidity. Some are investing in extractor fans and dehumidifiers to tackle known problems.

“Improving the quality of housing data to provide insight, identify trends and shape more proactive maintenance.”

- **Survey respondent**

“Currently doing surveys on all properties to see if better insulation etc can cut down on damp and mould.”

- **Survey respondent**

Work underway on the wider front includes:

“100% stock condition surveys, extensive investment in response to damp, mould and condensation work.”

- **Survey respondent**

“Moving forward with collecting good data of the condition of our homes to become more proactive, ie, hot spot mapping.”

- **Survey respondent**

What's new

Quite a number of providers have made the link between Awaab's Law compliance, stock condition and customer satisfaction for the longer term. Some are seeing the first year of implementation from 2025 as a time for embedding new policies and practice, so that they will be better prepared for the next phases of implementation and beyond.

For the immediate response, that means investing in on-site technology that can automate processes such as generating a report for tenants. At the centre, it means trying to find technologies that can be integrated across the organisation and certainly IT that allows fast and straightforward reporting. Appointment systems are increasingly online and text message-based, though this does require a note of caution regarding digitally excluded tenants.

There was an understandable focus on DMC. But some of the technology can also be used in connection with other emergency hazards and will be highly useful as providers move on to the second and third phases of Awaab's Law.

One organisation recently introduced a new system to link data from several business areas to help plan targeted visits. Another is testing a new hazards module that will 'speak' to its housing management system, helping ensure integration of data. It must be said, however, that challenges of technology and resources are very evident in this area.

9 Legal and access

- There are concerns over ambiguity in guidance and the general complexity of the legal situation
- 'No access' remains a concern
- Some organisations are moving to deal better with disrepair cases.

Some organisations noted the lack of clarity on aspects of the detail in the government's draft guidance, particularly over the maximum timeframes, meaning of certain terms and any exemptions. Two terms in particular with interpretable meaning were cited: 'emergency' versus 'significant' and 'all best endeavours'. Participants felt that this added to an already complex and sometimes unclear legal framework.

Other concerns included:

- The likelihood of claims firms increasing the number of legal challenges
- Possible legal challenges over the availability of suitable alternative accommodation.

On this second point, the HOS published a [report on wider orders](#) on three providers concerning temporary moves, where poor practice had been found. Among the problems were poor record keeping and confusions about policy. Providers will need to pay attention to this aspect of Awaab's Law to ensure compliance.

One participant commented that some residents with vulnerabilities might not be able to exercise their rights under Awaab's Law. The organisation was conscious of this and the need to avoid them being disadvantaged. It was putting extra effort into working with such residents. But a different organisation was concerned that some residents might misuse medical evidence to gain priority.

A specific issue related to the interaction between specific resident circumstances and physical hazards was raised. This relates to clause 3.2 in the Awaab's Law initial guidance which states that landlords will need to consider the age and physical and mental health of residents when assessing potential harm from a hazard. A survey participant felt that the building surveyors who undertake assessments are unlikely to be able to judge how medical conditions might be affected by particular levels of hazard. Other organisations said they were training their building surveyors in HHSRS and Awaab's Law requirements. Organisations are developing their own risk matrices to support the fair and consistent assessment of risk. These are clearly evolving, but are likely to become standardised as good practice and case law increases clarity.

The issue of 'no access' and legal remedies is discussed in a separate report. It was raised again by many participants specifically in relation to Awaab's Law because providers are under increasing legal and regulatory pressure to meet the deadlines. In summary, many providers are working hard to build a relationship with residents and gain their trust to allow access. Where legal remedies are used to gain access, this can involve long delays. ALMOs also face delays when using council legal teams that may themselves be under-resourced.

The main reasons for 'no access' cited were stigma, hoarding, fear of eviction and misunderstanding. On the last point, one organisation now requires operatives to call the housing team before leaving the property if nobody has answered the door. It was found that often tenants were in but did not hear the bell.

There was much concern that organisations could be penalised over these kinds of problems. The guidance (section nine in the final version) covering this does offer a clear defence for cases where *"the landlord may have made multiple attempts to arrange a time to access the property ... but been unable to do so within the given timeframes"*. However, landlords must have used 'all reasonable endeavours' and must have full records to show why the failure to comply was unavoidable. Without any case law to draw on, providers were apprehensive about this, including the meaning of 'reasonable endeavours'.

It should be noted also that the guidance similarly offers a defence on timescales where:

- Approval from the Building Safety Regulator is required before starting work
- Specialist contractors or materials are required
- There may be no suitable alternative accommodation nearby.

What's new

There is considerable uncertainty simply because the legislation is new and has not been tested as yet. Organisations had many concerns about a potential rise in disrepair cases or other legal action and about 'claims farming'. However, some had taken positive action to deal with complaints and disrepair claims quickly and thoroughly, with new protocols and timescales¹. Data recording was seen as crucial.

On 'no access', some organisations are clearly moving away from a legal and enforcement stance, toward a 'talking first' approach.

10 The future: conclusions and recommendations

Providers have been working to meet the new requirements from October 2025 and some are making fundamental changes in order to be ready for further phases of Awaab's Law implementation. A number of participants in our study welcomed the new law as an important tool in driving up standards and protecting tenants. In this final section we examine the challenges for future years and offer recommendations on what could help providers deliver high quality services to their tenants in compliance with the new law.

A healthy two thirds of our survey respondents said they were either planning for future phases alongside this year's implementation, or were on track to meet the deadlines in 2026 and 2027 (see Figure 3). But just under a quarter said they had not yet started and a small percentage expected significant challenges in meeting the requirements. Two respondents ticked 'other'. Of these, one was looking to get ahead of legal deadlines. The second expected to meet operational requirements but anticipated problems with tight HRA resources and the activities of no win no fee legal firms.

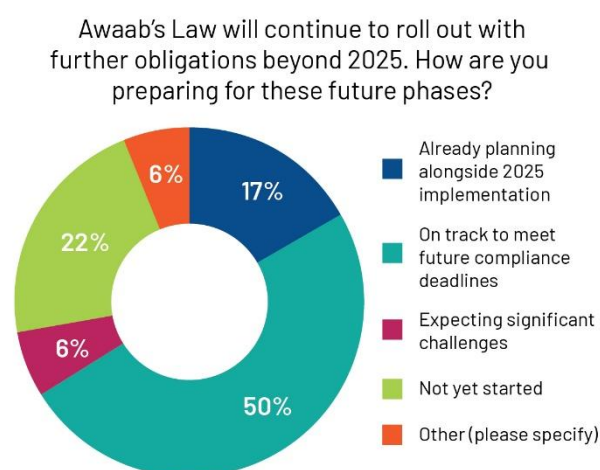


Figure 3: Preparation for future phases of Awaab's Law

¹ Birketts solicitors have produced a useful set of [flow charts](#) to help providers stay legally compliant in responding to Awaab's Law

Providers face challenges over resources, funding, staff training, specialist recruitment, meeting legal timeframes and gaining access. Some are innovating with new systems and technology. There is a cultural shift underway toward recognising residents' experience of services and building relationships. Tackling DMC has gained added impetus by being in the first implementation date for Awaab's Law. But participants felt this issue will continue to pose challenges well into the future.

There was no hint of outdated attitudes around residents and 'lifestyle' in relation to DMC. Instead there is a widespread concern that residents' circumstances can exacerbate problems and these are difficult issues for a housing organisation to resolve. There is sensitivity around this of course but especially with DMC issues providers report that people are suffering through the cost of living crisis, cannot afford to turn their heating on or want to keep the windows shut to conserve warmth. Others are having to live in overcrowded conditions above the design tolerance of the building, that can worsen humidity.

"Developed a proforma on a tablet for inspectors/surveyors. Added elements to make sure they're capturing the customer side too: so customer profile: does the person use the heating? If it's apparent people aren't using the heating, can we signpost them to sources of support."

- Meeting participant

A number of organisations are offering support to residents, as part of a general shift toward being more empathetic and responsive. As noted earlier, some are trialling damp and mould or environmental sensors to help pick up problems earlier (*"direct link of minimum energy efficiency standards (MEES) and DMC agendas"*). Some are fitting ventilators and dehumidifiers. Most are signposting residents to help with maximising finance and meeting bills.

There were particular concerns around finding suitable alternative accommodation for residents that need it, within Awaab's Law timeframes. A few organisations planned to hold a small number of properties vacant for this purpose, but given the extreme demand pressures many local authorities face, this was likely to be difficult. 'Suitable' in the guidance includes being within reach of children's local school, etc. Smaller organisations could find this especially difficult. Finding accommodation in the PRS at short notice could also be difficult, especially in high demand areas.

"Social housing registers nationally are overflowing and there is a shortage of private rental housing. It is accepted this is the utopia, but it is not realistic, these properties simply do not exist. Due to the quantum of people waiting for social housing and with the pressures on social landlords regarding homelessness, many landlords cannot remove properties from their stock to have sat empty waiting for temporary use."

- Survey participant

The final Ministry of Housing, Communities and Local Government (MHCLG) guidance does suggest that providers may have a defence if they cannot find suitable alternative accommodation quickly. It says providers must work with tenants to find a solution.

Future challenges mentioned most frequently in the survey are:

- Timeframes
- Integration
- Legal and access
- Resources including specialists, contractors, admin capacity, staff knowledge
- Concerns over disrepair claims, no win no fee claims firms
- Challenges over moving people out and finding suitable accommodation at short notice.

Government support

Many participants in the study felt more could be done at government level to facilitate the transition to full implementation of Awaab's Law. There were repeated calls for:

Clarity

The draft guidance from MHCLG left ambiguities in the meaning of some terms and in some aspects of the timeframes. The final guidance did not appear until shortly before implementation. Organisations wanted clearly defined requirements to work to.

Legal issues

There was much concern about solicitors and claims firms bringing disrepair cases or using the new law. While residents' rights were recognised, providers wanted action to inhibit 'claims farming'.

"The more money paid to claims farmers is less money to invest in the housing stock. The individuals being affected are the very ones the legislation is designed to protect – tenants."

- Survey participant

Where providers need to take legal action themselves to gain access, they wanted faster and more straightforward routes. This issue is dealt with in our separate report on access.

Funding and capacity

Most of the organisations in our study reported limited funding and capacity to respond to the new law. They were using a variety of approaches to prioritise cases. Looking to the longer term, many felt there were basic problems with ageing stock. The interaction of the new Decent Homes Standard, MEES, the regulatory consumer standards, the net zero agenda and Awaab's Law was leading many to try to 'get on the front foot' with asset management but very substantial investment would be needed. Some called on government to create a special capital fund for upgrades.

Appropriate IT and other technology

Here again, funding was a problem and many organisations were struggling with older systems that do not integrate across all service areas. This in turn hampered the sharing of vital information. But there were also difficulties that appropriate technology to meet the specific housing management needs of Awaab's Law duties does not appear to be available yet. Many called for government support to create a universally applicable system, including mobile devices, that can record, monitor and generate straightforward reports for tenants.

We endorse these calls for government action as we believe these measures would strengthen providers' ability to respond appropriately to the new legislation.

Appendix 1: Case studies

An experience reported at a focus group:

Attendee: you've got loads of different information in different systems and it's good to have everything in one place, so we've worked with our data and IT team and produced something called our (name) report, so it's pulled data from probably six different areas of business. Then we use that. It's available to the housing officers, so they can plan targeted visits.

We do probably about 3,500 tenancy contacts and visits each year. Housing officers have been focused for the last 18 months, two years and one of the clear questions is... is there any evidence of damp, mould or condensation in the property? So we have trained a lot of staff on what to look out for, to offer advice about ventilation and drying of clothes and things like that. And also, to pick up on repair issues. But we've used this dashboard to plan the targeted visits. So that if we've got customers out there that haven't reported a repair, they haven't contacted us for any general inquiry, they haven't had a visit in the last 12 months, then we're using that dashboard to plan visits to give us a bit more of a targeted approach.

Because obviously, there might be (someone) out there, she pays the rent, she reports repairs regularly. We've been in with no problems at the property. It's the other people that we maybe don't know enough about that we want to get into the property to make sure that the condition is okay and there's no vulnerability, so that's been, again, a bit of a game changer for us over the last couple of months since we introduced it. So that's something that I'd encourage anyone to focus on, pulling that information together, rather than just going out ad hoc and not really focusing on who you're going to see.

East Midlands Housing Group (emh)

East Midlands Housing Group (emh) is one of the largest providers of affordable homes and care and support services in the East Midlands. It has nearly 22,000 properties. The group includes emh homes, emh care and support and Midlands Rural Housing which is a specialist rural housing service. emh is a significant business in the region, with a turnover of £153m and net assets of £242.5m. It builds over 400 properties per year.

Damp and mould

emh has taken a proactive approach on damp and mould over the last three years rather than waiting for changes to legislation and regulations. A dedicated in-house team of operatives and a supervisor was set up to focus on diagnosis and treatment. It replaced its reliance on contractors and subcontractors. Some 64% of cases of damp and mould are now achieving a first-time fix. The remaining cases involve an investigation of the root causes and in-depth remediation to the building fabric. The target is wherever possible to close jobs within 28 days. However, this has raised issues over 'no access' – see below.

emh introduced a pre-emptive approach where damp and mould cases have been found in properties in specific streets or similar property types. Other households are contacted and asked whether they have issues relating to damp and mould. This approach has been successful in helping customers who have remained silent because, in many cases, they believe there is stigma in reporting damp and mould. Over 100 orders have been raised over the last 12 months as a result of this proactive approach.

emh also adopts a "wellbeing call" approach, whereby residents are contacted three months after the original damp and mould repair was carried out. Residents with a known vulnerability within their home are contacted in the first instance. Over 150 orders have been raised as a result of the call over the last twelve months. In addition, stock condition survey information is considered and any planned capital investment works which are programmed which may address the root cause of the known issue.

The resident scrutiny panel has played a significant role in producing reports and recommendations to address damp and mould. These have been discussed at board and committee meetings with the chair of the panel participating.

emh considers that a key component of ensuring a successful culture change on dealing with damp and mould is behavioural change across the organisation. For example, mandatory training (including refreshers and updating) has been introduced for all customer-facing and contact centre colleagues.

Awaab's Law

Phase one of Awaab's Law focuses on (i) damp and mould and (ii) emergency and significant hazards. emh considers that its actions over the last 12 months are contributing to successful implementation. Consideration has been given to the introduction of phases two and three over the next two years and in the new repairs and maintenance policy.

A strategic Awaab's Law team was set up in 2024 with membership drawn from across the organisation including communications, housing and communities, development, finance, etc. A preparedness plan has been developed, which considers the implications for the wider group.

Also as part of the preparation for the formal introduction of Awaab's Law in October 2025, an internal audit was carried out with the recommendations being converted into an action plan. Key metrics have been introduced and these are reported to and discussed by boards and committees.

'No access'

An exceedingly small number of customers explicitly refuse access but sorting these cases out is resource intensive and frustrating for the landlord. emh has come across a small number of cases where access is an issue; however the works order remains open during further attempts to gain access.

In addition, 'no access' can sometimes be an issue on damp and mould cases where following a diagnostic investigation further access is required to carry out remedial works. emh's procedure is then to send a maximum of three letters before going down the route of legal procedures to ensure the safety and wellbeing of residents.

emh practises a continuous improvement approach in all it does, which is bolstered further by a robust audit programme and membership of consortia to share and learn from best practice.

Homes in Somerset

[Homes in Somerset](#) is an arm's length management organisation (ALMO). It manages over 4,000 properties on behalf of Somerset Council. It was previously Homes in Sedgemoor but adopted its new title in spring 2025 following the transfer of the Council's development team.

Homes in Somerset considers that it is in a strong position in tackling damp and mould (and there has not been a high level of reporting²) and dealing with emergencies. This is because it had previously taken a positive approach:

- Tackling damp and mould has been a relatively high priority
- There is a long-standing policy of carrying out initial inspections within 48 hours and undertaking work within seven days
- There is a high degree of scrutiny and monitoring by the senior management team, the board (at each monthly meeting) and the Council (through the health and safety partnership forum)
- A small team has been set up comprising a project manager, a hazards surveyor and a hazards coordinator
- All teams have had training at various levels on Awaab's Law.

Nevertheless, there are challenges:

- Having sufficient alternative accommodation available, if required, at a range of locations in a large rural county
- Vulnerabilities of some of the tenants – customer services is geared up to asking appropriate questions about the scale of the problem and access issues.

In addition, one of the major reasons for damp and mould is fuel poverty. Tenants are unable to afford to heat their homes. A further factor is the age of the stock – the majority of which is over 70 years old. The asset management strategy is investigating this issue.

² In total, at any one time, there may be up to five cases of damp and mould in the summer months and between 60 and 70 cases in the winter

Homes in Somerset recognises that the introduction of phases two and three of Awaab's Law in 2026 and 2027 will be challenging. All HHSRS hazards are currently addressed, but phases two and three will introduce new timelines. This will impact on programming and budgets.

Kirklees Council

A difficult time last year for the West Yorkshire based council has led to a solid turnaround that points to a better future.

Just before the Regulator's consumer standards came into force in 2024, Kirklees Council's homes and neighbourhoods department decided it must self-report on missed fire safety actions and a longstanding backlog of damp, mould and condensation (DMC) cases.

Working with the Regulator, the housing department set about making systematic changes. An immediate problem was that although the authority was addressing large numbers of cases from the backlog, new ones coming in kept the overall number of open cases at a high level. The challenge was to move from crisis to 'business as usual' where all cases were dealt with promptly.

The department took action at two levels. First, it set up a multi-disciplinary team specialising in DMC. This is based in the repairs team but includes housing management staff. A service improvement plan covering the whole organisation gave a structure to work to.

The second level of action was to set up a damp management action group (DMAG) to assess performance and accountability. This group reported bi-weekly and monthly to the RSH on progress toward compliance during the Council's regulatory engagement. This group oversaw a vital change to evidence-based reporting, with every DMC case properly tracked and actioned. Lacking online systems, the department custom designed a DMC case management tracker, which is Excel based, to handle cases and manually cleansed the data. It has proved so successful – and has been endorsed as effective via external audit – that the department is only cautiously considering upgrades as commercial products become available.

Initially, the team admit, it was hard to clear the backlog and they felt they were 'treading water'. An exercise to predict the workload of new cases at different times of the year enabled the department to programme in its work on the backlog as well and momentum started to build. The budget was doubled from £1m to £2m a year with another £0.5m to deal with the backlog. Both the DLO and external contractors were brought on board with the task. The outcome has been dramatic: open cases have reduced from 2,028 to 166.

In the beginning the department adopted a 'top ten' safety net with the ten cases open longest going to the DMC manager for action. This rolling programme, with the next longest case added in each time another was resolved, helped ensure no case was missed. Today the 'top ten' is little used, because all cases are tackled in good time.

The system also includes a vulnerability component. In the period before Awaab's Law came into force, cases were triaged and a resident vulnerability level (one to three, with three as the highest) assigned. This helped to assess which cases were the most urgent and led smoothly into the new requirements and timeframes from October 2025.

Along the way the department has trained up its staff on damp and mould prevention via an e-learning course and surveyors are being trained in HHSRS and Awaab's Law requirements. A "no-blame" culture has been embedded, focusing on resident wellbeing and communication. That includes educating tenants in DMC prevention and making them aware of their tenancy agreement responsibilities. Tenants are contacted by phone three months post works and visited by a surveyor after six months, to pick up any further problems and track satisfaction with the service.

The department has carried out two self-assessments against the HOS Spotlight report on DMC and takes every opportunity to learn from past cases. The first self-assessment led to some changes, such as including voids and mutual exchange properties in DMC checks, while the second confirmed that the department was complying on all points.

The work over the last two years has stood Kirklees in good stead for further implementation of Awaab's Law, the department believes. While DMC was the 'guinea pig' topic, the remaining requirements can be slotted into the systems for tracking and oversight.

To put the department on the front foot for the longer term, the service is moving to full stock condition surveys over a three year period. Tackling DMC problems earlier has meant it has been able to save a little on repairs budgets, which it plans to re-invest in home sensors and other measures to detect problems, improve home comfort and reduce fuel poverty.

"A culture shift was initiated to reinforce that residents are not at fault. The responsibility is ours, the landlords. To identify specific issues related to DMC, whether related to the fabric or conditions within the property, we proactively work with tenants through education or stock improvements."

- Kirklees Council

Stoke on Trent City Council

A rise in reports of damp, mould and condensation (DMC) two years ago led Stoke on Trent City Council to take action with a public campaign. The 'zero tolerance' initiative encouraged tenants to report DMC problems, stressing the danger to their health. People reporting issues were visited and any necessary works completed, with tenants offered advice on how to prevent problems recurring.

That work has put the Council in a good position of readiness for Awaab's Law implementation. The department had already geared up, employing surveyors and training them in HHSRS requirements and ensuring they had painters and other appropriate tradespeople available.

This year the department set up a task force to oversee its work on Awaab's Law and is tracking its response and compliance during the implementation phase. As part of this, in September the task force led a full end to end run through of its systems with role play for staff. The test included a range of scenarios – mostly around DMC, but also other HHSRS hazards. It allowed what the department sees as 'fine tuning': while managers are confident they have the big picture in hand, refinements are always possible.

In April this year the department brought its repairs service fully in-house: it was previously run via a council-owned company. It's part of a culture shift to putting the housing officer at the centre of relationships with the tenant, with the repairs service working in support of that housing service. Patch officers directly manage the process of moving people temporarily or where access becomes difficult, also working with social services and other Council teams where needed, to ensure the service is built around the tenant.

The service expectation is to call every tenant at least once a year, to build relationships and find out if the tenant is having any problems they have not reported. As a unitary authority, Stoke on Trent City Council has been able to run education across other departments as well, so that any officer who has occasion to visit a tenant knows they can report anything amiss and who to contact. The Awaab's Law timeframes can make this challenging as a staff member may not be returning to the office for some days – so it has been important to alert them to the need for fast reporting.

The mantra in the department is 'evidence, evidence, evidence'. Whatever the situation, it is essential to have the data, photos, logs and all other details to hand, organised and dated, both to ensure nothing is missed and in case of challenge.

Here, the Council admits IT systems can be problematic. The department is anticipating a large scale upgrade shortly, as software firms respond to the new law and create bespoke systems. The aim will be to embed 'one version of the truth' – in other words, consistent and reliable data across the organisation.

Good quality data is of course essential in cases where the organisation has not been able to gain access to a tenant's home. Recently letters to tenants about access have been changed to include a clause on recharges. The Council is warning that where DMC has spread and caused damage, that could have been tackled sooner if access was allowed, the tenant may be charged for the extra cost of remedial works. The policy has yet to be tested in practice as most tenants do allow access but is seen as a reasonable backstop position.

For the longer term future, the Council believes government support for stock investment will be essential. Currently celebrating 100 years of being a city, Stoke has some of the oldest Addison Act homes dating from the 1920s. Much of the stock is outdated and there are problematic tower blocks too. Rent convergence will bring in a little more funding but fundamental problems remain and the Awaab's Law requirements, along with other legislative requirements are set to increase. Inevitably around the country there will be at least some disrepair cases and others going to the Ombudsman. The department would like to see a more streamlined system so that Ombudsman rulings are taken into account by the courts and that the Ombudsman route is a prerequisite before commencing litigation. That should reduce the number of cases and ensure a single compensation offer to tenants where mistakes are identified.

Appendix 2: Awaab's Law – a model for compliance

[Awaab's Law – a model for compliance.](#)

This document also includes model KPIs for compliance.

Appendix 3: List of sources

The aim of this part of the report is to provide some useful and accessible online sources (as of November 2025). It does not include material that is only available through subscriptions or membership of organisations. Each source is, where appropriate, briefly annotated to help the reader identify relevant information.

Please note that it is not a reference list of material used in the desktop review in stage one of the project.

MHCLG

- MHCLG press release (27 October 2025) on the introduction of Awaab's Law: [Millions of tenants safe from black mould through Awaab's Law](#)
- MHCLG non-statutory guidance relating to the Hazards in Social Housing (Prescribed Requirements)(England) Regulations 2025 (updated on 27 October 2025): [Awaab's Law: Guidance for social landlords – timeframes for repairs in the social rented sector](#)
- [Hazards in Social Housing \(Prescribed Requirements\)\(England\) Regulations 2025](#). This is the secondary legislation that takes forward the primary legislation in the [Social Housing \(Regulation\) Act 2023](#)
- MHCLG making things right: social housing issue? Know how to complain – [social housing tenants](#) and the specific information on [Awaab's Law](#). These two sources are aimed at helping tenants know their rights. It is updated on a regular basis.

Housing Ombudsman Service (HOS)

- [Spotlight report on repairs and maintenance – Repairing Trust](#) (May 2025). Focus on four issues relevant for Awaab's Law:
 - Need for a culture shift
 - Importance of predictive maintenance modelling
 - Strengthening relationships with residents and contractors
 - Code of conduct for entering people's homes.
- Emergency repairs (20 May 2025) – [learning from severe maladministration report | May](#). This report specifically looks at emergency repairs in relation to Awaab's Law
- Damp and mould reports (28 October 2025) – [latest damp and mould report](#). HOS regularly publishes reports covering severe maladministration reports on damp and mould
- Temporary moves (18 November 2025) – [Housing Ombudsman highlights three wider orders on temporary moves to prevent future failings](#). Focus on three wider order covers temporary moves and decants. Decants are an important part of phase one of Awaab's Law

- [Housing Ombudsman shares learning from complex leak cases](#) (20 November 2025). Although this focuses on a wider issue, it notes that this is relevant for dealing with the underlying causes of damp and mould cases.

Shelter

- [Hazards in social housing](#). This includes a specific section on the duties of social housing landlords under Awaab's Law.

Appendix 4: List of acronyms and short forms

Acronym	Description
AI	Artificial intelligence
ALMO	Arm's length management organisation
ARCH	Association of Retained Council Housing
CIH	Chartered Institute of Housing
CWAG	Councils with ALMOs Group
DMC	Damp, mould and condensation
HA	Housing association
HHSRS	Housing Health and Safety Rating System
HOS	Housing Ombudsman Service
HRA	Housing Revenue Account
IT	Information technology
KPI	Key performance indicator
LA	Local authority
LGA	Local Government Association
MEES	Minimum Energy Efficiency Standard
MHCLG	Ministry of Housing, Communities and Local Government
NFA	National Federation of ALMOs

Appendix 5: Our approach to the research

Because of the importance of the links between the two project topics of Awaab's Law and 'no access', this appendix provides an overview of our approach.

Our joint approach for this project consisted primarily of four activities:

- Brief desktop review of previous research, good practice material and policy documents
- Online survey
- Focus groups
- Case studies.

In addition, because of the fast-moving nature of the issues (especially Awaab's Law with phase one starting on 27 October 2025), news items, briefings, legal judgements and policy updates were reviewed between August and October.

Desktop review

Various search engines were utilised to identify published sources which were then examined for relevance. It was found that there was a proliferation of material on Awaab's Law, but much of this was historic and related to the case itself rather than the introduction of statutory requirements. In relation to 'no access', there were only a few relevant documents.

Online survey

This centred primarily on social housing landlords.

For 'no access', 52 organisations provided quantitative data and 57 submitted qualitative information. Of the organisations, just under half were LAs, a third were HAs and under a quarter were ALMOs. Four submissions were made by residents including a scrutiny panel chair and resident board member. One submission was by a non-resident board member.

For Awaab's Law, 36 organisations provided quantitative data and 40 respondents submitted qualitative data. Of these organisations, just under half were councils, a third were housing associations and just under a quarter were ALMOs.

Focus groups

These took the form of semi-structured online events lasting normally between 60 and 90 minutes. This approach was adopted following the lessons learnt from a face to face pilot focus group held with residents on a social housing estate.

The focus groups covered both 'no access' and Awaab's Law.

Membership of the focus groups was drawn from a diverse range of organisations and geographies.

There were eight focus groups:

- 2x asset management staff
- 2x housing management
- 1x strategic management
- 2x residents (total number of participants – 29)
- 1x staff in various roles.

In total, 105 staff participated in the focus groups.

In addition, there was a meeting of ALMO staff.

Case studies

The aim of these case studies was to obtain primarily qualitative information on the opportunities and challenges of addressing 'no access' and Awaab's Law. The commissioners of these two projects made suggestions on possible social housing landlords and this was added to by links that HQN staff have with organisations.

The final selection aimed to ensure there was coverage of a wide range of types of landlords and geographies.

Information was collected on both 'no access' and Awaab's Law primarily through online interviews with key staff and, in one case, through face to face meetings. This was written up in draft by HQN members and the participating organisations were able to comment on the factual accuracy.

The HQN research team

- Janis Bright
- Tim Brown
- Mel Cant
- Lydia Dlaboha
- Wayne Hughes
- Chris Poulton
- Fay Yeomans.



Fast, practical guidance on everything to do with housing

HQN provides high-quality advice, tailored support and training to housing associations, councils, ALMOs and other housing providers.

Find out more about HQN and our network membership by visiting hqnetwork.co.uk or call us on +44 (0)1904 557150.

***Disclaimer:** The conclusions and recommendations presented in this report are based on the information available to us at the time of writing. While we have made every reasonable effort to ensure the accuracy and completeness of the information provided, we cannot guarantee that there are no other factors that may affect our conclusions and recommendations. We do not accept any liability whatsoever for any errors or omissions in this report, or if this report is used for an alternative purpose from which it is intended and we cannot be held responsible for any damages, losses, or expenses arising from the use of or reliance on the information contained herein.*

Rockingham House, St Maurice's Road, York, YO31 7JA
Tel: +44 (0)1904 557150 Email: hqn@hqnetwork.co.uk

Visit: hqnetwork.co.uk

HQN Limited Registered in England Reg No. 3087930