# Preparing for Awaab's Law – a checklist

**JULY 2025**

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Last week, the Ministry of Housing, Communities and Local Government (MHCLG) finally published the full guidance to landlords for the implementation of Awaab's Law from October 2025. To help you prepare, HQN has compiled a handy checklist to mitigate risks and ensure compliance.

Awaab's Law will come into force for the social rented sector from **27 October 2025**. From this point social landlords will have to address **all emergency hazards** and **all damp and mould hazards** that present a significant risk of harm to tenants to fixed timeframes.

**In 2026**, the government will extend regulations to include the following hazards where they present a significant risk of harm:

- 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.

**In 2027**, the government will extend regulations to all remaining HHSRS hazards (apart from overcrowding) where they present a significant risk of harm.

# Preparing for Awaab's Law – checklist ahead of October 2025 start date

Please note: the following points are high level and there is a great deal of detail sitting behind each one.

1 **Update policies and procedures:**

- Review and update all policies and procedures and sign off on urgency definitions to include agreed commitments
- Develop protocols for hazard triage, investigation and repair, aligning with the guidance's timelines
- Establish clear escalation paths for tenant and contractor reports
- Update processes for short-term rehousing
- Define urgency frameworks.

2 **Know your properties:**

- Identify and monitor high-risk properties
- Carry out preventative repairs

- Prioritise properties with previous complaints or vulnerable residents (eg, children, the elderly)
- Conduct proactive inspections (at tenancy start and annually).

3 **Enhance staff competencies:**

- Train property teams and contractors on:
  - Legal obligations
  - Hazard assessment
  - Tenant vulnerability evaluation
  - Compliance documentation
  - Escalation routes.
- Identify 'triggers' requiring specialist input into investigations
- Hire or upskill staff to handle rapid responses and complex cases
- Train/raise awareness of requirements more widely for everyone involved in visiting homes or dealing with repair requests, providing a customer-facing service (eg, housing officers, customer services teams, estate services teams).

4 **Upgrade IT systems:**

- Implement software for workflow, real-time tracking, reporting and GDPR-compliant data management
- Integrate environmental monitoring tools to proactively address risks
- Ensure systems are adapted/capable of monitoring and reporting the required timescales/outputs.

5 **Strengthen contractor management:**

- Review contracts to ensure compliance with Awaab's Law timelines and reporting obligations
- Secure backup contractors to address capacity shortages.

6 **Plan resources:**

- Assess capacity for repairs, staff and alternative accommodation, budgeting for increased costs
- Identify options like vacant stock for temporary housing
- Ensure staffing levels meet demand including urgent callouts on weekends and bank holidays.

7 **Develop communication strategies:**

- Educate tenants on reporting hazards and their rights, using accessible formats
- Prepare for complaints by documenting all actions thoroughly
- Acknowledge reports promptly and keep residents informed at all stages, including repair rights and timescales
- Think about using case managers for accountability.

8 **Mitigate litigation risks:**

- Seek legal advice to understand obligations and defences, such as 'reasonable endeavours'
- Maintain detailed records to defend against potential lawsuits.

9 **Pilot and refine processes:**

- Test new procedures to identify gaps and ensure readiness by October 2025.

10 **Reporting and governance**

- All the following will be essential:
  - Log all reports, investigations, works and communications
  - Report performance to leadership, tenant panels and boards
  - Maintain auditable records for regulatory scrutiny
  - Ensure evidence of compliance is available
  - Provide governing body with your plan for preparedness and progress against it.
- The RSH will want to see evidence of the assurance governing bodies are getting on preparations at inspections.

11 **Engage with residents in reviewing the process and approach:**

- Involve scrutiny panels (or similar bodies)
- Run wording/communications, policies and procedures past engaged residents
- Provide information and reporting to tenant groups.

# Awaab's Law – comparison to consultation

Alongside the guidance, the MHCLG published its response to the consultation on Awaab's Law. Here, we breakdown how the new guidance differs from the original proposals set out in the consultation. Please note the tighter deadlines.

| Consultation | Guidance | Comment |
|---|---|---|
| Awaab's Law was set to cover all 29 hazards at the same time on commencement of the regulations | From **27 October 2025** landlords will have to address **all emergency hazards** and **all damp and mould hazards** that present a significant risk of harm to tenants to fixed timeframes<br><br>**In 2026** the regulations will be extended to include the following hazards where they present a significant risk of harm:<br>• Excess cold and excess heat<br>• Falls associated with baths etc, on level surfaces, on stairs and between levels<br>• Structural collapse, and explosions<br>• Fire and electrical hazards<br>• Domestic and personal hygiene and food safety<br><br>In 2027 the regulations will be extended to all remaining HHSRS hazards (apart from overcrowding) where they present a significant risk of harm | The government has decided to phase the requirements in over two years, starting with damp and mould and extending eventually to all HHSRS hazards, apart from overcrowding |

| Consultation | Guidance | Comment |
|---|---|---|
| The point at which the registered provider becomes aware of a potential hazard is the point at which legal obligations under Awaab's Law will begin. It will not be necessary for residents to take a complaint through a landlord's formal complaints procedure in order to trigger the timescales | The point at which legal obligations begin under Awaab's Law is when the social landlord becomes aware of a potential hazard or a material change to a potential hazard | Clarified that the day the landlord becomes aware of a potential hazard is counted as day 'zero', with day one of timeframes commencing the following working day<br><br>But raised an issue about whether reporting to a contractor constitutes the landlord becoming aware or not and suggests RPs take their own legal advice – *"whether the landlord 'becomes aware' when the contractor becomes aware or when the contractor reports the issue to the landlord is likely to depend on whether the contractor is, legally, acting as an agent of the landlord. Landlords should take legal advice as to the status of their contractors"* |
| The social landlord must action emergency repairs as soon as practicable and, in any event, within 24 hours | They must, as soon as reasonably practicable, and within 24 hours:<br><br>Investigate the hazard and if there is an emergency hazard, complete the relevant safety works | No change |

| Consultation | Guidance | Comment |
|---|---|---|
| If a social landlord is made aware of a potential hazard in a social home, they must investigate within **14 calendar days** | Investigate any potential hazards within **ten working days** of becoming aware of them | The same timescale but expressed in working days rather than calendar days<br><br>However, they have introduced four types of investigation when originally there was one:<br>• Standard investigations<br>• Renewed investigations<br>• Further investigations<br>• Emergency investigations |
| The social landlord must provide **a written summary of the investigation findings to the tenant within 48 hours** of the investigation concluding | The social landlord must **usually produce a written summary of their findings and issue this to the named tenant within three working days after the investigation concludes**<br><br>If all required works are completed to address a significant or emergency hazard before the end of the three working day period, a written summary will not be required, although social landlords must inform the named tenant that the work has been completed | Provided more time and made it working days and also excluded the need if all repairs completed within that three-day period |

| Consultation | Guidance | Comment |
|---|---|---|
| If the investigation finds a significant risk to the health or safety of the resident, the social landlord must **begin repair works within seven calendar days of the written summary being issued** | Where an investigation has found that a home is affected by a significant hazard and it, or a subsequent investigation, identifies relevant safety work or relevant supplementary preventative work, the social landlord must, within five **working days** of the investigation concluding, **complete relevant safety work** (using temporary measures if necessary) and, within five **working days** of the investigation that identifies relevant supplementary preventative work concluding, begin or take steps to begin any relevant supplementary preventative work to ensure the hazard does not recur<br><br>If excepted due to shortage of materials, labour or permissions the social landlord must take steps within five **working days** of the investigation concluding to arrange the completion of the relevant supplementary preventative works as soon as reasonably practicable and **within 12 weeks** | Tighter deadlines – **complete** safety measures even if temporary within five working days rather than **begin**<br><br>**Begin** more permanent work to prevent a reoccurrence or make good – except if delays in materials or specialist contractors or permission needed for work – then 12 weeks |
| The social landlord must satisfactorily complete repair works within a reasonable time period. The tenant should be informed of this time period and their needs should be considered | No change | No change but landlords need to be aware of more complicated timescales with clocks being reset for specific events |

| Consultation | Guidance | Comment |
|---|---|---|
| If the property cannot be made safe within the specified timescales for Awaab's Law, then the social landlord must offer to arrange for the tenant(s) to stay in suitable alternative accommodation until it is safe to return | If the social landlord is unable to complete the relevant safety work within the initial remediation period **(five working days from the completion of the investigation that identified the hazard for a significant hazard or 24 hours for an emergency hazard)**, they must secure the provision of suitable alternative accommodation at their expense, until the relevant safety work has been completed | The same expectations but added complication and detail provided in section eight of the guidance for the duties of social landlords to rehouse tenants at this time |
| The social landlord will be expected to keep clear records of all attempts to comply with the proposals, including records of all correspondence with the tenant(s) and any contractors. If the social landlord makes all reasonable attempts to comply with the timescales but is unable to for reasons genuinely beyond their control, they will be expected to provide a record of the reasons that prevented them from doing so | If a tenant brings a claim against them for breach of Awaab's Law, landlords will need to be able to evidence why the failure to comply was unavoidable. They should therefore keep clear records of all attempts to comply with Awaab's Law requirements, including records of all correspondence with tenants and any contractors, including those relating to the provision of suitable accommodation | Made it more clear that it is in the landlord's best interest to keep good records of everything to mount a defence if required |

| Consultation | Guidance | Comment |
|---|---|---|
| Person conducting investigation must have right skills and experience | The social landlord must ensure an investigation is conducted by a person who (in the reasonable opinion of the social landlord) is competent to do so. This should be a person with the skills and experience necessary to determine whether the social home is affected by a significant or emergency hazard. A social landlord should use properly qualified specialists to investigate where relevant | *"In the reasonable opinion of the social landlord"* is a welcome addition but reference to *"properly qualified specialists to investigate where relevant"* creates potential for argument and litigation |
| Landlord expected to make judgement on best way to conduct investigation and physical investigation not necessary | Standard investigations can be conducted remotely unless the named tenant specifically requests an in-person investigation<br><br>If a named tenant specifically requests an in-person inspection after an investigation has been done remotely, a 'renewed' in-person investigation must be carried out<br><br>Emergency investigations can be done remotely<br><br>The further investigation must include an in-person inspection if the tenant so requests it (and an in-person inspection has not already been carried out) | Added more detail to when landlords can do a virtual investigation and when they have to do an in-person one |

| Consultation | Guidance | Comment |
|---|---|---|
| To cover all existing 29 hazards | To cover all HHSRS hazards apart from overcrowding | Excluded overcrowding as recognised problem of lack of larger homes to move people to |

# About the authors

**Chloe Fletcher** leads on networks and events. She is a senior and well-respected leader in the social housing sector with over 25 years of experience. She previously worked for the National Federation of ALMOs, leading their policy and lobbying work. She worked with government and local authority stakeholders to make the case for council housing and ALMOs and ensure good practice was shared across the ALMO sector. She started her housing career in housing management and has a Masters in Housing with a Professional Qualification.

HQN's specialist in asset management, repairs and maintenance, **Wayne Hughes** has experience as a consultant and director of property and building services which spans two decades. As well as many years of working as a consultant in this area he also has hands on practical experience of delivering and overseeing the repairs and maintenance service, having worked for several councils and associations.

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