Title: The Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 – 'Awaab's Law': final stage impact assessment **Lead department or agency:** Ministry of Housing, Communities and Local Government	Impact Assessment (IA) **Date: 23 June 2025** **Stage:** Final IA **Source of intervention: Domestic** **Type of measure:** Statutory Instrument **Contact for enquiries:** socialhousingsafety@communities.gov.uk

Summary: Intervention and Options

RPC Opinion: N/A

Cost of Preferred (or more likely) Option (in 2025 prices, 2025 present value)			
Total Net Present Social Value	**Business Net Present Value**	**Net cost to business per year**	**Business Impact Target Status**
£-180.6m	£-92.7m	£10.8m	N/A

What is the problem under consideration? Why is government action or intervention necessary?

The Grenfell Tower tragedy in 2017 raised serious concerns about how some social tenants were being treated by their landlords. The tragic death of two-year old Awaab Ishak amplified these concerns and threw into sharp relief the need for government efforts to rebalance the relationship between social tenants and their landlords, and to improve the quality of social housing across the country.

The Social Housing (Regulation) Act 2023 ('the Act') introduced a series of reforms to social housing, following on from in-depth consultation with tenants and others post-Grenfell. Whilst the Act was being taken through Parliament, an inquest into the death of Awaab Ishak found that he died as a result of a respiratory condition caused by damp and mould in his social home. Despite being aware of the mould, his landlord did not take action for over two years. A campaign was launched by Awaab's family that called for legislation introducing timeframes for social landlords to make repairs in their properties, and Awaab's Law was introduced as an amendment to the Act.

Setting timescales will leave no ambiguity as to how quickly social landlords should respond to hazards in their property that put tenants' health and safety in danger, and will empower tenants to challenge their social landlords directly when they fail to provide them with a safe home.

This first set of regulations will apply to damp and mould and all emergency hazards. This is part of a phased approach which will allow us to deliver the new rules as effectively as possible. We will take a 'test and learn' approach between phases which will allow us to incorporate feedback from the sector and residents to ensure that the policy has a lasting impact. Further regulations will be laid in due course. Landlords will continue to be encouraged to act on all hazards in a timely manner and not to wait for regulations to be laid.

What are the policy objectives of the action or intervention and the intended effects?

The overall objective of this policy is to ensure that registered providers of social housing (referred to as 'social landlords' in this document) respond quickly to reports of hazards in their homes and so better protect their tenants from unsafe housing conditions. The legislation will:

- set clear requirements on social landlords as to how quickly they must respond to hazards in the homes and what hazards are covered by this requirement (i.e. damp and mould and all emergency hazards);
- encourage better communication between landlords and residents, providing certainty on when and how repairs will be carried out;
- make it easier for social tenants to understand their rights when it comes to repairs in their homes and enable them to challenge their landlords with legal action if they need to.

The legislation will reduce the number of social tenants who are left living in hazardous conditions for indefinite or long periods of time. The English Housing Survey showed that 4% of social homes in 2023 had a Category 1 hazard and 7% had a problem with damp and mould (equating to approximately 160k and 280k households respectively). Figures reflected in the Housing Ombudsman Service's Spotlight Report "Repairing Trust", indicate that only between 5% (London) and 17% (Yorkshire and the Humber) of social tenants rated their landlord as good or excellent at providing information about progress of repairs requests. This legislation will improve tenants' health outcomes, with wellbeing and economic benefits to tenants, and avoid the worst cases. Moreover, this should support a culture change in the sector where more social landlords take a proactive approach to repairs and engaging residents on repair works, with action taken promptly if hazards are identified.

We know that some providers already address hazards in a timely fashion: this is evidenced in the (limited) data we have been able to collect using consultation responses from private registered providers and local authority registered providers. However, we know that there are outliers which have a significant impact on the health and wellbeing of residents, as evidenced in complaints made to the Housing Ombudsman (of which 40% - the largest category of complaint – relate to housing condition). The (mean) average repair time therefore likely remains high due to extreme outliers. Eradicating these outliers is critical to tenant safety. The person-centred approach to Awaab's Law will also require landlords to address category 2 hazards as emergencies in some cases where it is deemed reasonable as a tenant is particularly vulnerable. This will represent a significant improvement in the speed of this kind of remediation, as well as a significant boost to the broader sense of tenant safety within their home.

This legislation will bring significant benefits. Poor quality housing can significantly impact health, educational and productivity outcomes. Research suggests that damp and mould growth can worsen pre-existing health conditions[1], and may have particular impacts on vulnerable groups such as children and older people[2]. Tenants' mental health can be impacted by disrepair[3], and the impacts of adverse living conditions are exacerbated by an inability to afford solutions[4]. Further, improved educational attainment linked to greater housing quality is expected to improve future prospects, with the Department for Education estimating that a one-grade improvement in overall GCSE attainment is associated with an £8,500 increase in present value lifetime earnings[5]. Remediation of all damp and mould (at category 1 level) in the social rented sector would be estimated to save the NHS £10m per annum (2019 prices)[6].

It should be noted that is not possible to isolate such impacts to Awaab's Law (and therefore monetise the benefit) due to insufficient data and concurrent, complementary regulations operating in this space (e.g. the Decent Homes Standard). However, research such as the above indicates that there will be cost savings for the NHS associated with quickly addressing hazards, and direct benefits for social housing tenants. By comparison, the costs are directly calculable.

[1] https://iris.who.int/bitstream/handle/10665/164348/9789289041683-eng.pdf?sequence=1&isAllowed=y
[2] https://www.instituteofhealthequity.org/resources-reports/the-health-impacts-of-cold-homes-and-fuel-poverty/the-health-impacts-of-cold-homes-and-fuel-poverty.pdf
[3]https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/research_the_impact_of_housing_problems_on_mental_health#:~:text=1%20in%205%20English%20adults,impact%20upon%20their%20mental%20health
[4] https://researchbriefings.files.parliament.uk/documents/CBP-9696/CBP-9696.pdf

Therefore, while it is essential to ensure that the policy is effective and delivering value for money, it is important to note that there are limitations in the Impact Assessment which are explained through this document. As a result, it should be viewed in the round, as a key part of the decision-making process but noting that there will be wider benefits that it has not been possible to calculate, especially the prevention of significant harm and potentially tragic outcomes.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

The Social Housing (Regulation) Act 2023 introduced Awaab's Law (clause 42 Social housing leases: remedying hazards). The clause requires the Secretary of State to set legally binding time limits for requiring landlords to take action in relation to hazards affecting social housing through secondary legislation (and created the powers to do so). The clause specifies that the Secretary of State **must** make regulations. Not proceeding with the preferred option would mean the Secretary of State could be subject to judicial review for not making regulations.

Whilst preparing the government amendment to the Social Housing (Regulation) Act 2023, the following options were considered.

Option 1: Do nothing (Not recommended).

Option 2: Legislate for timescales for landlords to respond to hazards (Recommended option).

Option 3: Publish a policy statement on timescales for repairs and direct Regulator of Social Housing on their standards (Not recommended).

Option 1 would not have satisfied the policy aim. As set out above, we know under the current regulatory regime there are significant examples of landlords not addressing hazards in a way that could cause harm to residents (although we acknowledge that many landlords do take prompt action).

Option 2 was the preferred option, and the Social Housing (Regulation) Act 2023 introduced Awaab's Law (clause 42 Social housing leases: remedying hazards). Legislation is the only way to ensure social landlords can be held to account directly by tenants if they fail to take repair action to keep tenants safe.

Option 3 would not achieve the policy aim of securing individual redress for tenants. The Regulator of Social Housing does not intervene in individual cases and only takes action where there is systemic failure by a social landlord. We believe legislating for timescales that landlords must meet is the best way to drive a meaningful culture change within the sector: there will be no ambiguity as to landlords' duties to respond within timescales to reports of hazards, and tenants can challenge their landlords for a breach of their legal duties if they fail to do so.

A consultation on the proposals for Awaab's Law ran from 9 January to 5 March 2024. Following that consultation a summary of the government's confirmed position is below.

Awaab's Law will be implemented in phases, with separate regulations being laid for each implementation phase to ensure we have sufficient flexibility to implement lessons from the test and learn approach. We are keen to make sure each phase builds on the last to create a lasting legacy for social tenants, and ensuring feedback from tenants and the sector is incorporated into each phase is vital to achieving this. Implementation is planned as follows:

- From 27 October 2025 Awaab's Law will apply to damp and mould hazards that present a significant risk of harm ("significant hazards"), and all emergency hazards (Phase 1).
- In 2026, we will extend the requirements to also include the following significant hazards: excess cold and excess heat; falls; structural collapse; fire; electrical and explosions; and hygiene hazards (Phase 2).
- Then in 2027, we will extend the requirements to the remaining types of hazards covered by the Housing Health and Safety Rating System (HHSRS) (excluding overcrowding) where they are significant hazards (Phase 3). The full list of hazards within scope of Awaab's Law can be found in Annex A.

[5] https://assets.publishing.service.gov.uk/media/60c36f0cd3bf7f4bd11a2326/GCSE_Attainment_and_Lifetime_Earnings_PDF3A.pdf

[6] BRE_cost of poor housing tenure analysis 2023.pdf

This Impact Assessment covers Phase 1 of implementation – we will publish additional Impact Assessments in due course.

For a hazard to be in scope of the Awaab's Law timelines for repairs, the hazard must present a significant risk to the health or safety of an individual tenant and the hazard must result from defects, disrepair or a lack of maintenance to the social home or other buildings or land for which the social landlord is responsible. Awaab's Law requires social landlords to:

- Investigate any potential hazards within 10 working days of becoming aware of them.
- Produce a written summary of investigation findings and provide this to tenants within 3 working days of the investigation concluding.
- Take action to make the home safe (using temporary measures if necessary) within 5 working days of the investigation concluding.*
- Investigate potential emergency hazards and take action to make all emergency hazards safe (excluding hazard remediation work) as soon as possible and within 24 hours.
- Begin works to stop the problem coming back as soon as possible, and no later than 12 weeks after the investigation has concluded.
- Satisfactorily complete repairs within a reasonable time period, without unreasonable delays.
- Secure the provision of suitable alternative accommodation if the registered provider is unable to complete work to make the home safe within 5 working days, or 24 hours in emergency situations.

  *To note Awaab's Law does not require social landlords to do work to remediate cladding, as this is driven by the wider Building Safety Regime and references to making safe and doing work above should be read accordingly. The Government outlined its commitment to accelerating building remediation through the Remediation Acceleration Plan (RAP), published on 3 December. Additionally, the Government is working with social landlords and regulators to develop a long-term remediation strategy, which will be announced later this year.

Awaab's Law includes a provision for a defence if social landlords have taken all reasonable steps to comply, but it has not been possible to do so for reasons genuinely beyond their control. The social landlord should therefore keep clear records of all attempts to comply with the proposals, including records of all correspondence with the resident(s) and any contractors.

The above proposals are based on the proposals in the consultation on Awaab's Law (see: Awaab's Law: Consultation on timescales for repairs in the social rented sector - GOV.UK). The response to the consultation has been published. We are publishing draft guidance for landlords alongside the laying the regulations, and will provide finalised guidance for Landlords in early October as well as further guidance for residents when the regulations come into force.

Will the policy be reviewed? Yes – after a maximum of 5 years.				
Is this measure likely to impact on international trade and investment?		N/A		
Are any of these organisations in scope?	**Micro** **Yes**	**Small** **Yes**	**Medium** **Yes**	**Large** **Yes**
What is the CO_2 equivalent change in greenhouse gas emissions? (Million tonnes CO_2 equivalent)		**Traded:** **unquantified**	**Non-traded:** **unquantified**	

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits, and impact of the leading options.

Signed by the responsible Minister: ***Date: 19/06/2025***

Matthew Pennycook MP

Summary: Analysis & Evidence

Description: Legislate for timescales for landlords to respond to hazards (Recommended option)
FULL ECONOMIC ASSESSMENT

Price Base Year: 2025	PV Base Year 2025	Time Period Years: 10	Net Benefit (Present Value (PV)) (£m)		
			Low: -121.9	High: -.239.2	Best Estimate: -180.6

COSTS (£m)	Total Transition (Constant Price) Years		Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	6.0		9.6	**87.6**
High	6.0		23.5	**204.9**
Best Estimate	6.0		16.5	**146.3**

Description and scale of key monetised costs by 'main affected groups'

Social landlords already have a responsibility to maintain their homes to meet the Decent Homes Standard (DHS), including keeping homes free of category 1 hazards, to remedy disrepair, and to maintain homes so that they are fit for human habitation (although we know e.g. from Housing Ombudsman cases that these standards are not always met). The duty to make repairs to address hazards is not a new burden on social landlords: the difference and additional burden from Awaab's Law is the speed at which repairs arising from hazards need to be responded to, not the repairs themselves. A further additional burden is the duty to provide a written summary to residents, which is not currently a requirement, although many landlords will already be keeping records of their repairs activity and interaction with tenants.

Following the consultation, we have updated our monetised costs to include the additional staff required to action reports and repairs at a quicker pace. However, in line with our phased approach to implementation, this analysis focuses on damp and mould and emergencies which will be covered in the first set of regulations. Our best estimate for total cost of Phase 1 is now £180.6m (PV, 2025 prices), of which £129.0m is attributable to additional staffing.

While this estimate is based on information provided by registered providers during consultation (adjusted for prevalence of hazards), this was in response to the policy position at that time. The final design has been refined to address concerns about deliverability from landlords, including issues with timelines set as calendar days requiring an increase in weekend working, costs of delivering written summaries, and the differing timelines required to complete work. Responsible RPs who are already addressing hazards promptly should be able to proceed with repairs in what we believe are similar timelines to today. For this reason, we expect our best estimate of cost to be biased upwards. This is discussed further in the Risks and Assumptions section.

The total cost also includes the time taken for providers to familiarise themselves with the regulation changes, £6.0m (PV, 2025 prices), and preparation and postage costs, £11.3m (PV, 2025 prices), for the proposed requirement that a written summary of findings is provided to the resident that includes details of any hazard identified and (if applicable) next steps, including an anticipated timeline for repair.

Other key non-monetised costs by 'main affected groups'

There may be additional costs in relation to training of current staff to understand the new requirements, given the significant differences to current requirements and processes (i.e. the Decent Homes Standard or Housing Health & Safety Rating System). It is unclear to what extent registered providers will have included these costs within their 'additional staffing' estimates provided at consultation. Similarly, there will be additional costs in relation to updating systems and management processes. Government will be providing information and guidance to support landlords to familiarise themselves with these regulations which should help mitigate some of these costs.

While we assume that emergency hazards will not result in additional costs (given current practice within the sector), there may be additional costs in relation to supplementary works, which we are unable to cost given limited data.

While not additional as a result of this legislation, there will be additional costs to social landlords where repairs are currently not taking place. These costs are, however, additional to society, and will result in greater repairs and maintenance activity from social landlords than would have otherwise occurred.

BENEFITS (£m)	**Total Transition** (Constant Price)	Years	**Average Annual** (excl. Transition) (Constant	**Total Benefit** (Present Value)
Low	N/A		N/A	**N/A**
High	N/A		N/A	**N/A**
Best Estimate	0		-4.1	**-34.3**

Description and scale of key monetised benefits by 'main affected groups'

It has not been possible to provide a headline estimate of monetised benefits of this policy given lack of quantitative evidence with which to robustly attribute additionality. Category 1 hazards must already be rectified according to existing legislation. Therefore, where these repairs already occur, societal benefits are not additional. As set out above, some landlords will meet these obligations and this is seen in the (limited) data gathered following the consultation. But we know that some do not: the Housing Ombudsman's spotlight reports present signifcant cases of hazards not being addressed for much longer periods of time. Where repairs would have taken significantly longer, Awaab's Law will result in improved outcomes and avoid signifcant adverse outcomes.

In addition, Awaab's Law considers the effects of hazards on particular tenants, and may also include category 2 hazards in some cases. There will also be additionality where high-scoring Category 2 hazards are rectified and this benefits a tenant because of their specific health concerns. While such benefits will occur, it is not possible to aggregate given the various combinations of hazards and tenant vulnerability (such as damp and mould with asthma) which are likely to exist.

We have monetised a negative benefit to society of providers spending money on speeding up repairs instead of building new supply (PV, -£34.3m).

Other key non-monetised benefits by 'main affected groups'

An expected outcome of Awaab's Law is social landlords taking faster action to respond to hazards in a home that are significantly impacting a tenant's health and safety. Whilst social landlords in many cases may already respond to hazards within reasonable timescales, Awaab's Law will provide a backstop where others are failing to take their responsibilities seriously, leaving tenants in danger, thus preventing extreme cases where hazards take years to address.

<u>Health benefits</u>

Hazards in the home can have a range of health impacts which can be broadly categorised into physiological harm, psychological harm, infection and accidents. English Housing Survey data shows that c.288,000 social homes contain damp problems, and that households living in a poor-quality home are more likely to contain at least one member with a long term illness or health condition.

We cannot isolate remediation of these problems to Awaab's Law due to existing obligations within the Decent Homes Standard and elsewhere, which means we cannot monetise this benefit. However, remedying hazards in a more timely way will reduce the likelihood of these health impacts occurring or

escalating. Social landlords will be expected to respond to any reports of hazards in their home within a fixed timeframe and provide a written summary of their findings, which will improve the repairs and maintenance service that tenants receive and lead to wellbeing improvements by reducing uncertainty and worry about their safety. These health improvements are likely to result in a reduced burden on the NHS, with fewer housing relating issues resulting in tenants requiring medical attention.

Societal benefits

There are also likely to be wider societal benefits of reducing health and safety hazards in homes, such as reduced instances of lost employment, lower productivity due to ill health, and improved education outcomes from lesser illness as a result of poor-quality housing.

Inherent benefits of faster repairs

A clear route for tenants to take action where a landlord does not act on hazards that have been reported and that present an imminent or significant risk to health will also empower tenants to raise safety issues in the home early, could result in lower cost of repairs and maintenance. The relationship and trust between landlord and tenant could also be vastly improved if landlords do act swiftly in these cases.

Key assumptions/sensitivities/risks	**Discount rate**	3.5

The scale of impacts from Awaab's Law is uncertain and hard to quantify due to a lack of available data on the current volume and speed of repairs that will be covered by the scope of Awaab's Law and therefore subject to change. The analysis uses data provided by social landlords during consultation, but this was limited in coverage and so may not be fully representative.

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m (2025 Prices, 2025 present value):			**Score for Business Impact Target (qualifying provisions only) £m:**
Costs: 10.8	**Benefits: 0**	**Net: -10.8**	N/A

Evidence Base

Problem under consideration and rationale for intervention

In November 2022, the Senior Coroner for Manchester North ruled that Awaab Ishak died in December 2020 due to damp and mould in the social home his family rented from Rochdale Boroughwide Housing (RBH). The Regulation 28 Report to prevent future deaths concluded that action to treat and prevent the mould was not taken despite RBH being made aware of the presence of the mould initially in 2017. RBH inspected the property in 2020 and confirmed the presence of mould. The Coroner found evidence that the mould remained a continuing and recurring issue whilst the family lived in the property, despite a health visitor explaining their concerns about the potential impact of the mould on Awaab's health in July 2020.

By the time Awaab died, years after RBH were aware of the damp and mould, no action had been taken to treat the mould, which was extensive and present in all the rooms in the flat. This event raised serious concerns about how social landlords are handling complaints from tenants about hazards in their home, and the delays some social tenants experience in getting their homes made safe and decent.

Powers for 'Awaab's Law' were first introduced via the Social Housing (Regulation) Act 2023. Legislation is needed to specify how quickly registered providers should be taking action against health and safety hazards in homes, and to provide tenants with a route to hold their registered providers to account through the courts if they fail to do this. This first set of regulations uses these powers to implement Awaab's Law for damp and mould and all emergency hazards, with additional regulations to extend Awaab's Law to remaining HHSRS hazards to follow in due course.

Social landlords already have legal and regulatory duties to keep their properties fit for human habitation and a responsibility to maintain their homes to meet the DHS (which specifies homes must be free of category 1 hazards and in a good state of repair). Many social landlords do respond to complaints about disrepair in an effective and timely manner, and it is likely that Awaab's Law won't increase the burden in terms of their existing duties to investigate and fix hazards in homes.

However, some social tenants are left waiting months or even years for their landlords to fix hazards in their homes. Living in hazardous conditions can have a significant impact on the health, safety and wellbeing of residents and lead to illness and/or injury. In the worst cases, the results can be fatal, and the tragic death of Awaab Ishak demonstrates the profoundly serious harm that can come from living with untreated dangerous conditions in the home. That is why Awaab's Law is needed as a backstop, to no longer tolerate cases where social landlords are failing to make repairs quickly enough and leaving their tenants at risk.

Although most social tenants live in homes that are free or largely free from damp and mould or the most serious hazards, around 7% of social homes (approximately 288,000 homes) in England have damp problems, and around 4% of social homes are estimated to have a category 1 hazard as defined by the Housing Health and Safety Rating System (HHSRS).[1]

We also know the disparity in health between those in poor quality and good quality homes has widened in recent years. In 2013, the proportion of households with a member suffering a health condition was similar in damp (33%) and non-damp (32%) homes. By 2023 those in damp homes were significantly more likely to suffer from long term health conditions (47% vs 39%)[2].

The reason that existing obligations may not be working as expected is likely due to:

a) The absence of specific timeframes for repairs to be done;
b) Current obligations being too rigid;
c) Unclear mechanisms for the tenant to hold the landlord directly to account.

Under the Landlord and Tenant Act 1985, unfitness for human habitation must be rectified and repairs addressed in a reasonable timeframe. However, the Act doesn't set specific time limits. Not only does this mean that timeframes for repairs are left to the landlord's discretion, but it is unclear to tenants what an acceptable delay may be, resulting in uncertainty as to when tenants have a legitimate case to make complaints regarding delays. If they do challenge through the courts or the Housing Ombudsman, what is

1 English Housing Survey 2023-2024 Chapter 1: Housing quality - GOV.UK
[2] EHS Health and Housing factsheet English Housing Survey 2023 to 2024: health and housing - fact sheet - GOV.UK

a 'reasonable timeframe' is only established after the fact. This can leave a tenant living in poor conditions for extended periods of time as a case is taken through litigation. Introducing timeframes for social landlords to address hazards will make it clear how quickly landlords must take action and empower tenants to raise concerns. Awaab's Law is clear: repairs must begin within 5 working days of an investigation being completed, or 24 hours in an emergency.

Further, some tenants will be particularly vulnerable to the poor health outcomes from certain hazards and repairs will be required more quickly to mitigate the risk of harm. Existing legislation does not currently cover circumstances where a tenant's individual circumstances warrant faster action. Awaab's Law takes a person-centred approach to hazards which gives it a greater focus on making specific tenants safe in their home, rather than meeting a proscribed standard for the typical tenant. It is possible that a category 2 hazard could represent a greater risk to a tenant's health than a category 1 hazard depending on their personal vulnerabilities. Social landlords will be required through Awaab's Law to factor this into their decision making, which may prompt faster repairs and better engagement with existing obligations.

We have heard from social tenants that they often experience barriers in getting hazards investigated or fixed by their landlords.[3] Evidence from the Housing Ombudsman Service indicates that social tenants can struggle to engage their landlords on issues within their homes and repairs can take a long time, putting some at risk. Additionally, a tenant must initially pass through the landlords' complaints process before the Ombudsman can take on the case.

In the Risks and Assumptions section below, we present survey data from the NHF indicating current repair times for emergency and non-emergency cases, which finds a median repair time of 26.1 days[4]. Under Awaab's Law a landlord will have to investigate, make safe and begin repairs where reasonably practicable within 15 working days (24 hours in an emergency), with a backstop of 12 weeks to begin work where there is no alternative.

Awaab's Law is needed to provide these additional points of certainty and clarity.

Why is government best placed to resolve the issue? Could the issue be resolved without intervention (e.g. through the market, innovation or other stakeholder led change)?

There is a clear public interest in the government taking firmer action on social landlords in this space.

The government is responsible for setting requirements on social landlords through standards and legislation. Although registered providers of social housing will have published policies that set out the timescales in which they will carry out different types of repairs, these are not legally binding. The 'Right to Repair' also sets out timescales for some repairs and gives a right to compensation if these timescales are breached, but these are not comprehensive and only apply to council tenants.

Awaab's Law will be implemented by the government through legislation to ensure that social tenants and landlords are clear on how quickly hazards should be addressed, and to enable social tenants to challenge their landlords through the courts if they are failing to meet their statutory duties. If the courts find a social landlord in breach, they will be able to order that the landlord conduct the works and/or pay compensation to the tenant.

The absence of legislative timescales for repairs may not be preventing many social landlords from actioning repairs to hazards quickly, but we consider that legislation is needed to make perfectly clear to the sector that social landlords must not delay taking action in response to hazards, and that repairs should be a priority for social landlords to help keep their tenants safe in their homes. Furthermore, as the case of Awaab Ishak has shown, some landlords are not investigating or fixing hazards quickly enough, with some residents left months or years living in unsafe conditions. Introducing legally binding time limits across the sector will create parity for social housing residents, regardless of who their landlord is.

Strict time limits set by the government under Awaab's Law is considered the most effective way to generate a lasting cultural change within the sector. The Awaab's Law clause in the Social Housing (Regulation) Act 2023 requires the Secretary of State to set legally binding time limits for investigation and repairs of hazards through secondary legislation (and created the powers to do so). The clause specifies

3 We engaged in 2023 with social residents on their experiences of repairs and maintenance and Awaab's Law. 62% of those residents (based on a sample size of 140 residents) reported experienced barriers in getting hazards investigated or fixed by their landlords. Repairs, maintenance and Awaab's Law - wave 2 online community: Resident Panel report (accessible version) - GOV.UK

4 To note that this has been calculated from a small sample of 13 PRPs.

that the Secretary of State must make regulations. Not proceeding with the preferred option would mean the Secretary of State could be subject to judicial review for omitting to make regulations.

We recognise that the introduction of Awaab's Law will represent a cost to social landlords, however the extent to which this is the case will vary across the sector, with the greatest cost falling on those currently not properly fulfilling their responsibilities towards their tenants. Landlord responses to our consultation demonstrated that for some, the additional costs of Awaab's Law will be limited to familiarisation with the policy and the production of written summaries, with 37% of social landlord respondents agreeing that they expected costs to be small (question 24 in the consultation).[5] Other landlords told us that they disagreed with the assessment of costs set out in our consultation document, and that they would face further costs in hiring additional staff to meet the timeframes set out under Awaab's Law, although this was under the assumption that timings were based on calendar rather than working days and therefore require weekend working. That was the proposed policy at the time but is no longer the intention. We have updated the analysis in this impact assessment to take account of such feedback. We recognise that for some landlords the costs of meeting Awaab's Law might require them to deprioritise other services and investments, but we also need to ensure that the policy works effectively to keep residents safe. There are also positive cost implications for public services such as the NHS.

Rationale and evidence to justify the level of analysis used in the IA (proportionality approach)

Explain why the level of evidence presented and data gathered is appropriate to the problem under consideration. In some cases, it may be more appropriate to consider this point throughout the IA (for example, primary legislation and where the impacts of secondary legislation are not known).

Overview

This Impact Assessment is assessing the costs and benefits of the proposed policy options for Phase 1 of Awaab's Law, which will come into force via secondary legislation. In the absence of robust data covering all providers, costs have been modelled using consultation responses from private registered providers and local authority registered providers, as well as ONS statistics and research from the Building Research Establishment Group[6].

Category 1 hazards

Data is available on the number of category 1 hazards (as defined in the HHSRS) in social homes, and we have been provided with data on volumes of repairs from some social landlords. However, most social landlords only collect data on the volume of emergency and non-emergency (i.e. routine) repairs. It should be noted that not all category 1 hazards will be Awaab's Law hazards given category 1 hazards have the potential to cause harm within a year which is a longer time horizon than Awaab's Law accounts for. Social landlords usually set targets for emergency and routine repairs, and some hold data on their record of meeting these. However the threshold for Awaab's Law relates to individual circumstances (i.e. health and safety risks to individuals) and repairs are likely to sit between the thresholds of emergency and routine: this poses a significant data challenge.

Wider scope (vulnerability considerations)

The hazards that are in scope of Phase 1 of Awaab's Law are damp and mould hazards which are classed as 'significant', or all 'emergency' hazards, taking a person-centred approach. Significant hazards are those that pose a significant risk of harm to the health or safety of the actual resident of the dwelling, defined as 'a risk of harm to the occupier's health or safety that a reasonable lessor with the relevant knowledge would take steps to make safe as a matter of urgency'. Emergency hazards are those that pose a significant and imminent risk of harm, defined as 'a risk of harm to the occupier's health or safety that a reasonable lessor with the relevant knowledge would take steps to make safe with 24 hours'.

To be in scope of Awaab's Law requirements, the hazard must result from defects, disrepair or lack of maintenance in a social home or other buildings or land for which the social landlord is responsible. A hazard does not have to be at category 1 level in order to be in scope of Awaab's Law. This is because there may be instances where a particular resident is at a greater risk from hazardous conditions; for example a resident with asthma may be at greater risk from a home affected by damp and mould. An

[5] Awaab's Law: Consultation on timescales for repairs in the social rented sector - GOV.UK
[6] BRE cost of poor housing tenure analysis 2023.pdf (bregroup.com)

HHSRS assessment does not take the actual resident into account when establishing if a hazard is at category 1 level. Instead, it assesses whether the risk arising from the hazard is greater for a particular age group than any other age group in the population.

To determine the level of risk and whether a hazard presents a significant risk of harm and is therefore in scope of Awaab's Law, our recommendation is that landlords use their judgement and information about the tenant, refer to the non-statutory guidance on Awaab's Law and utilise the existing processes they have in place for triaging repairs. Landlords should also utilise a range of available information to determine whether there is a risk to the resident, this should include HHSRS guidance, and other available guidance including the consolidated guidance from DHSC and MHCLG on health risks in housing Understanding and addressing the health risks of damp and mould in the home - GOV.UK (www.gov.uk). There is no requirement for tenants to provide medical evidence in order to trigger Awaab's Law. However, if a landlord receives evidence from third parties (for example from medical professionals, social workers, or schools), they must factor this into their assessment. Data on the volume of hazards in social homes that would be in scope of Awaab's Law is therefore not available, meaning we have had to estimate the proportion of hazards that would be assessed as a significant or emergency hazard.

Using EHS data as a proxy

As a proxy, we have used the English Housing Survey (EHS) to estimate that 40% of faults identified in the social rented sector are classified as urgent[7,8]. This has been done using the physical inspection element of the EHS from 2018/19, the most recent available wave to include a full physical inspection, due to Covid-19. The survey considers faults for the following components: chimneys, damp, doors, dormers, roof covering, roof features, roof structure, wall finish, wall structure and windows.

Further limitations

Robust data is also not available on the volume or speed of repairs which remediate damp and mould/category 1 hazards, which would be the basis for monetisable benefits such as NHS savings.

It has not been possible to forecast the number of repair circumstances that will result in landlords having to secure the provision of suitable alternative temporary accommodation. However, the government's understanding from engagement with the sector is that providers will already offer to provide suitable alternative temporary accommodation in circumstances where the property cannot be made safe.

We have made use of published data (for example the EHS) and data provided to us by the sector via two surveys, both issued by the National Housing Federation (NHF) to its members, on the costs of complying with these proposals[9] and with the 'Provision of information to tenants Direction to the Regulator[10]. It should be noted that the sample sizes for data collection via surveys has been small. A qualitative summary of non-monetised benefits has been provided given either insufficient data and/or significant data challenges.

Policy objective

The overall objective of this policy is to ensure that social landlords respond quickly to reports of hazards in their homes and keep tenants protected from poor health or safety outcomes associated with hazards in their homes. These first regulations seek to achieve this objective for damp and mould, as well as all emergency hazards. This legislation will set clear requirements on social landlords as to how quickly they must respond to hazards or potential hazards in relation to damp and mould in their homes of which they become aware. These legal requirements should inform how social landlords manage their properties to ensure their safety and quality.

[7] A fault is defined as urgent if: it threatens immediate safety or is a health hazard; is currently promoting noticeable and rapid deterioration in other parts of the building; is at present causing difficulty or discomfort to the occupants; the security of the building is threatened.

[8] English Housing Survey 2018 to 2019: headline report - GOV.UK (www.gov.uk)

[9] This survey was conducted in Summer 2023 to inform this consultation. It has been used to inform assumptions on the volume and current speed of non-emergency responsive repairs carried out by the sector. A summary of responses can be found in Table 1 in the Risks and Assumptions section.

[10] This survey was conducted in Summer 2023 to inform the consultation on the 'Provision of information to tenants: Direction to the Social Housing Regulator on tenants' rights and complaints', published 27 September 2023. It has been used to inform assumptions on the proportion of providers who will contact tenants by post.

The legislation and accompanying communications will make it easier for social tenants to understand their rights when it comes to repairs in their homes and enable them to challenge their landlords with legal action if they need to.

The legislation will reduce the number of social tenants who are left living in hazardous conditions for indefinite periods of time. This in turn will reduce the negative health outcomes associated with living in hazardous conditions, and in the worst cases will prevent fatalities.

Intended outcomes of intervention

1. Improved health and safety for social housing tenants.
    a. Physical health outcomes will be improved. There will be a reduction in the number of tenants being harmed by hazards in their homes. For example, we expect to see fewer social tenants suffering from respiratory issues associated with damp and mould.
    b. Mental health and wellbeing will also be improved. For example, we expect to see a reduction in the number of social tenants suffering anxiety and stress associated with poor physical health outcomes and facing barriers to having hazards repaired quickly enough.
2. Improved relationships between social landlords and tenants as a result of improved repairs services and higher levels of tenant satisfaction.
3. Another outcome may be a longer-term reduction in costs for social landlords with repairs being conducted more promptly and therefore preventing issues from being exacerbated and resulting in higher repair costs (for example addressing a leak promptly will reduce further work associated with damp and water damage).

Intended effects – what will change as a result of intervention?

An expected result of this policy is a culture change in the sector where social landlords take a proactive approach to repairs and engaging residents on repair works, with no periods of inaction on repairs once hazards have been reported.

We anticipate improved communication between landlords and residents, with landlords being required to provide information to residents on the outcome of any investigations and any planned repair works, and what to expect with regard to a repairs schedule.

Residents living in dangerous conditions will be better protected by the proposed requirement for landlords to offer temporary suitable alternative accommodation until the property is safe to live in.

Indicators of success

Awaab's Law is being implemented via a phased approach. Under the regulations, the Secretary of State is required to carry out a review of the regulatory provision contained in the Regulations. The first review must be conducted within 5 years. However, the phased approach also gives us an opportunity to evaluate how the policy is being implemented well ahead of this, and we will look to undertake test and learn processes as subsequent phases are implemented.

Indicators of success will include improved tenant satisfaction with repairs and complaints, measured by the Regulator's Tenant Satisfaction Measures, a reduced number of non-decent homes (and particularly recorded cases of damp and mould in the EHS), a reduced burden on the healthcare sector from ill health or injury caused by hazards in social homes, and fewer fatalities caused by hazards in social homes.

Wider strategic objectives

Wider strategic objectives include ensuring that all social renters understand what to expect if their home is unsafe, and that all social landlords understand their responsibilities. An expected result of this policy is faster remediation of hazards in social homes and a wider culture change in the sector where social landlords take a proactive approach to repairs and engaging residents on repair works, with no periods of inaction on repairs once hazards have been reported.

This policy forms a crucial part of our Long Term Housing Strategy and seeks to prioritise safety of tenants and to deliver the biggest increase in social and affordable housebuilding for a generation. We are clear that homes must, above all, be safe. Safety is non-negotiable for all homes, and landlords must take urgent action to respond to issues when they arise. We want housing providers to put the people who live in their homes at the

heart of their mission, approaching their relationships with renters with care and professionalism so that mutual trust and respect is established – Awaab's Law will serve as an important backstop to ensure that all landlords take swift, effective action to address safety concerns.

Description of options considered

The Social Housing (Regulation) Act 2023 introduced Awaab's Law (clause 42 Social housing leases: remedying hazards). The clause requires the Secretary of State to set legally binding time limits for requiring landlords to take action in relation to hazards affecting social housing (and created the powers to do so). The clause specifies that the Secretary of State **must** make regulations. Not proceeding with the preferred option would mean the Secretary of State could be subject to judicial review for omitting to make regulations.

Whilst preparing the government amendment to the Social Housing (Regulation) Act 2023, the following options were considered.

Option one (not recommended): Do nothing

One option considered was to do nothing. There are existing requirements on social landlords relating to repairs and hazards, and there are also existing routes to raise complaints against landlords for residents dissatisfied with the services they receive, including in terms of reporting repairs and hazards.

However, this option would not deliver upon our desired outcomes. Existing legislation is not explicit on what is a reasonable timeframe for reports of hazards to be investigated and fixed. We consider that legislative reform is needed to make expectations explicit. We are aiming to generate a culture change within the sector to ensure residents feel safe in their homes and that their voices are heard when concerns are reported.

Social landlords are already required to ensure that the homes they rent out are free from category 1 hazards. However, as was the case in the tragic death of Awaab Ishak, it is clear that despite the existence of this requirement, there may still be instances where landlords' failure to take timely action can impact on the safety of tenants; in the worst cases, having fatal consequences. We believe a legal backstop is needed to deter landlords from dragging their feet on repairs, and to empower tenants to challenge their landlords on timelines if they are being failed by them.

As noted above, the clause specifies that the Secretary of State **must** make regulations. This option would therefore mean the Secretary of State could be subject to judicial review for omitting to make regulations.

Option two (recommended): Legislate for Awaab's Law

This option is to legislate for Awaab's Law, setting requirements on social landlords via secondary legislation. To build in flexibility to update the policy as lessons are learned from the sector and tenants throughout delivery, these requirements will be set in three phases with three corresponding sets of regulations. As noted above, the Secretary of State **must** make regulations. Not proceeding with the preferred option would mean the Secretary of State could be subject to judicial review for omitting to make regulations.

The clause in the Social Housing (Regulation) Act requires the Secretary of State to make regulations requiring landlords to take action in relation to hazards. It is therefore essential that government proceed with this option.

We think legislation introducing strict and clear timescales for social landlords to take action in response to hazards in social homes is the best way to generate a meaningful culture change needed within the sector. The results of our recent consultation on Awaab's Law supports this assumption, with each of our proposed requirements under Awaab's Law receiving majority support.[11] This legislation will supplement the Regulator of Social Housing ('the Regulator) consumer standards and the Housing Ombudsman's service which adjudicates on tenants' complaints.

The Regulator will play a role in holding landlords to account for a timely and effective repairs and maintenance service at a systemic level, however they will not intervene in individual cases of a landlord failing to make timely repairs. The Housing Ombudsman will continue to play an important role in adjudicating the resolution of disputes between landlords and tenants concerning repairs including in cases of Awaab's Law timeframes being breached.

[11] The full details of the Awaab's Law consultation responses can be found here: Awaab's Law: Consultation on timescales for repairs in the social rented sector - GOV.UK (www.gov.uk)

Option three (not recommended). Set timescales via regulatory standards

We considered introducing Awaab's Law through the Regulators' consumer standards, but this would not deliver the intended outcome of Awaab's Law which is to provide stronger legal grounds for individual tenants to take landlords to court when they require assistance on a specific case. We considered that a new legal route for redress was required, because the Regulator does not intervene in individual cases but only where there is evidence of systemic failure.

While both the Regulator and the Housing Ombudsman will play a role in holding landlords to account for a timely and effective repairs and maintenance service, it is important that residents are also empowered to challenge their landlords directly through the courts if they wish to secure direct redress.

This option would also mean the Secretary of State could be subject to judicial review for omitting to make regulations.

Summary and preferred option with description of implementation plan

Preferred option

We consulted on the following policy proposals:

- Awaab's Law should apply to all hazards under the Housing Health and Safety Rating System (HHSRS) that pose a significant risk to the health or safety of the actual resident of the dwelling.
- If a social landlord is made aware of a potential hazard in a social home, they must investigate within 14 calendar days.
- The social landlord must provide a written summary of the investigation findings to the resident that includes details of any hazard identified and (if applicable) next steps, including a timeline for repair and a schedule of works.
- If the investigation finds a significant risk to the health or safety of the resident, the social landlord must begin repair works within 7 calendar days of the written summary being issued.
- The social landlord must satisfactorily complete repair works within a reasonable time period. The resident should be informed of this time period and their needs should be considered.
- The social landlord must action emergency repairs as soon as practicable and, in any event, within 24 hours.
- 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.
- 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 resident(s) and any contractors. If the social landlord makes all reasonable attempts to comply with the timescales but is unable to for reasons beyond their control, they will be expected to provide a record of the reasons that prevented them from doing so.

The consultation received broad support for all of the above proposals. Respondents raised concerns about the deliverability of the policy as proposed in the consultation, with particular concerns about the application to all HHSRS hazards, the expression of timescales in calendar days, and the requirements for written summaries. We have subsequently made changes to improve the deliverability of the policy including:

- Moving to a phased approach to give the sector time to adapt and allow government to take a 'test and learn' approach. Government will lay separate regulations for each implementation phase.
- Changing timeframes across the policy from calendar days to working days (e.g. 5 working days to begin repairs post-investigation versus 7 calendar days) to save providers higher costs associated with weekend contracts.
- Extending the timeline to complete a written summary from 48 hours to 3 working days, and streamlining requirements. This will afford social landlords additional time and reduce burden on them.
- Confirmed that cladding and overcrowding will be out of scope. Cladding remediation remains a Government priority, but it is better addressed through other aspects of the regime (and work on

this is progressing, see the Remediation Acceleration Plan (RAP), published on 3 December). Furthermore, the intention of Awaab's Law is to focus on individual tenants and timeframes have been set with this in mind, which makes it less appropriate for cladding. Overcrowding is exempted as Awaab's Law is focussed on hazards which are borne out of disrepair, and for which the landlord is primarily responsible.

Implementation

Awaab's Law will be implemented in phases, with initial regulations bringing in Phase 1 covering damp and mould and all emergency hazards. We are committed to the success of Awaab's Law and it is critical that requirements set in legislation are effective, proportionate and deliver the best long-term outcomes for social housing tenants. We believe that a phased approach to implementation is the most effective way to deliver new requirements in a way that is considered and will leave a lasting legacy. It will allow us to take a 'test and learn' approach based on feedback from social landlords and tenants on what works. We are clear that Awaab's Law will apply to a wider set of hazards over time to protect tenants.

While we are in the process of phasing these requirements, social landlords must continue to meet their duties to keep their homes fit for human habitation and free of category 1 hazards and to remedy disrepair.

From October, tenants will be able to hold their landlords to account for failure to adhere to these regulations. The primary route of redress will be through the courts, but residents can also seek redress by making a complaint to their landlord which could then be escalated to the Housing Ombudsman.

Additionally, the Regulator will consider information or evidence of a failure to comply with this legislation when considering a provider's performance against their regulatory standards.

Monetised Costs

In total we estimate a net impact of these requirements to private registered providers of social housing (PRPs) and local authority registered providers of housing (LARPs) of £9.3m and £5.4m per year (PV, 2025 prices) respectively. Total costs over the 10-year appraisal period are estimated as £92.7m and £53.5m respectively. The cost impacts fall into additional staff costs, familiarisation costs and preparation/postage costs for written summaries, as detailed below.

Registered providers did not agree with the consultation stage costing assumptions, with the majority view (63%) that the assumptions were underestimated. This has been reflected with the addition of staffing costs to our Final Stage Impact Assessment.

To account for the legislation initially only covering damp and mould, we have adjusted the staffing and post and preparation costs according to the prevalence of damp and mould at category 1 level, as a proportion of all category 1 level hazards. The prevalence of hazard data sourced from the BRE shows how frequently a specific hazard occurs relative to all reported hazards[11]. Damp and mould constitutes 8.9% of applicable hazards[12]. In the absence of more granular data, we have assumed that Awaab's Law costs (additional staffing and post and prep) are equivalent across hazards, and that therefore the costs for the first phase of Awaab's Law are equivalent to 8.9% of the costs for all hazards, as per consultation responses.

We have assumed that emergency hazards will not accrue additional costs given landlords already aim to respond within 24 hours (with the vast majority meeting that target – landlord median of 95% in 2023/24).[13]

Additional staff costs:

Some landlords will face costs relating to the additional staff required to action investigations and repairs at a faster pace than their current practice. Whilst registered providers are already required to action such repairs, the requirement to action them at a quicker pace may require additional staff for landlords whose internal targets are currently longer than the timeframes set by Awaab's Law.

This cost has been informed by consultation responses from both private registered providers and local authority registered providers. Cost estimates which reflect additional staffing have been divided by

[12] Calculated as the number of incidences of damp and mould at a category 1 level, divided by the number of incidences of all hazards at a category 1 level (excluding overcrowding). - https://files.bregroup.com/corporate/BRE_cost%20of%20poor%20housing%20tenure%20analysis%202023.pdf

[13] https://assets.publishing.service.gov.uk/media/673f38f64ebce30ac7baf03b/TSM_Headline_Publication_Final.pdf

respective dwelling stocks of providers in order to produce per dwelling cost estimates. As we would expect, variation in providers has provided us with a range of per dwelling estimates, which is £30-£80, and therefore a midpoint of £55. To produce sector level estimates of the cost of new staff, this has been converted to 2025 prices, then extrapolated across stock covered by the legislation, adjusted to reflect consultation responses. As noted above, most registered providers did not agree with original cost estimates for familiarisation and postage and prep only. However, 36.7% of registered provider respondents (22.7% when weighted to dwelling stocks) did agree with the cost estimates before they included additional staff, therefore this proportion has been removed from this component of costs.

These costs for Phase 1 are estimated to be between £70.4m and £187.7m, with a best estimate of £129.0m.

Familiarisation costs:

These are costs relating to the familiarisation of staff with the new requirements under Awaab's Law through the reading and understanding of new measures. This cost is transitionary in year one of the policy only.

Landlords will be referred to the non-statutory guidance, which is estimated to be 30 pages, and the regulations, which are approximately 15 pages. Consequently, we have estimated these costs against a range of page lengths, from 40 to 50 pages, with a midpoint of 45 pages. Based on reading speeds of technical material, we have assumed that it takes an hour to read and a further hour to understand 20 pages of regulation, which we then scale to our estimated page lengths.

Many social housing providers are large organisations with multiple employees. Familiarisation activities will therefore often be required of many people per organisation. The number of people per landlord required to read the guidance will vary greatly based on the size of the organisation, but for illustrative purposes on average we expect 10 people at small landlords will be required to read the guidance in full and around 100 at larger landlords.

At present there are 231 large PRPs (with a stock volume of greater than 1,000 social dwellings) and 1,135 small PRPs (1,000 social dwellings or fewer) in the sector[14]. Using the same thresholds, there are 160 large local authority registered providers (LARPs) and 66 small LARPs in operation across the sector[15].

An average hourly wage cost of £25.89 (including a 20.2% uplift to account for non-wage costs) was calculated using 2024 Annual Survey of Hours and Earnings (ASHE) data for the familiarisation of officers, managers, and senior managers with the new requirements. We applied this cost, converted into 2025 prices, to the time taken to familiarise per staff member. We then scaled this by the estimated number of staff required to familiarise, for both larger and smaller providers, and then scaled this up to meet the volume of the larger and smaller providers in the sector. This resulted in total familiarisation costs, when using the midpoint estimate of a 45-page document, of £2.7m for larger PRPs and £1.3m for smaller PRPs. The total impact on PRPs is therefore estimated as £4.0m.

We quantified the equivalent costs for local authority registered providers, maintaining the same methodology, accounting for differences in the total number of smaller and larger local authorities. This resulted in total familiarisation costs of £1.9m for larger LARPs and £80k for smaller LARPs. The total impact on LARPs is therefore estimated as £1.9m.

The combined impact on the whole sector of **familiarisation costs across the appraisal period is thus £6.0m**.

Preparation and posting costs:

There are costs related to the preparation and provision of a written summary of investigation findings to tenants. From engagement with the sector, we understand that relevant information on repairs is already reported by maintenance teams, and that the additional preparation cost will be summarising this information into a letter to tenants. We do not anticipate this requiring manager sign-off and could be carried out by an automated system in future. As such, we have assumed that it will take 15 minutes of staff time per report sent. Using an estimated average hourly wage cost of £21.02 (including a 20.2% uplift

[14] https://www.gov.uk/government/collections/private-registered-provider-social-housing-stock-in-england
[15] https://www.gov.uk/government/collections/local-authority-registered-provider-social-housing-stock-in-england

to account for non-wage costs) calculated for housing officers from ASHE data, converted to 2025 prices, results in a cost of £5.26 per report sent.

To estimate the cost of sending reports, we have utilised information provided by the EHS which reports that 85% of households in the social rented sector have internet access[16]. We have reduced this by 10% to account for those tenants with internet access who would still prefer to receive correspondence by post. Therefore, we assume that 75% of tenants will receive correspondence electronically and 25% by post. We calculated the average cost to send a letter based on GOV.UK Notify[17], which is available to local authorities. Costs are assumed to be 20% higher for PRPs (it was not deemed proportionate to calculate exact costs separately).

To estimate total costs of sending the report (preparation costs plus postal costs), we have utilised data from the Regulator of Social Housing to identify the number of repairs. In 2023/25, there were 10.6 million non-emergency repairs and 3.7 emergency repairs carried out in 2023/24.

Using the EHS estimate that 40% of faults are classified as requiring an urgent repair as a proxy for the proportion of responsive repairs requiring a report to be provided to tenants, and multiplying by the 2.68 million relevant dwellings owned/managed by PRPs and 1.56 million owned/managed by LARPs, we estimate 4.3 million and 2.5 million repairs that require a report are carried out per year by PRPs and LARPs respectively.

Engagement with the sector has indicated that a report is already provided to tenants in some cases, or that the information is already provided in a different format (i.e. verbally). As such we have assumed that only 50% of these reports will be an additional burden to the sector. Combining this with the assumption that 25% of these households will be contacted by post (with the remainder by email) results in an average annual cost (preparation and postal costs) of £716km for PRPs and £401k for LARPs, or a combined total sector average annual cost of £1.1m, with a **total cost over the appraisal period of £11.3m**. We understand from engagement with the sector that the production and distribution of these reports could be automated. At this stage we have not attempted to estimate the effect of doing so on the preparation costs facing providers, if reports are automated to a significant degree.

Non-monetised costs

There may be additional costs in relation to training of current staff to understand the new requirements, given the significant differences to current legislation (i.e., the Decent Homes Standard or Housing Health & Safety Rating System). In particular, the new standards will require understanding of the interaction between tenants' characteristics and hazards. Current legislation is not tenant specific, only considering harms to particular age groups[18]. It is unclear to what extent registered providers will have included these costs within their 'additional staffing' estimates provided at consultation. These costs are therefore assumed to be non-monetised. Similarly, there will be additional non-monetised costs in relation to updating systems and management processes.

While we assume that emergency hazards will not result in additional costs (given current practice within the sector[19]), there may be additional costs in relation to supplementary works, which we are unable to cost given limited data.

To note that, while not additional to current legislation, there will be additional costs to social landlords where repairs are currently not taking place. Unless included implicitly within consultation responses, these are not considered within this Impact Assessment as they are not additional as a result of this legislation. They are, however, additional to society, and will result in greater repairs and maintenance activity from social landlords than would have otherwise occurred.

Monetised benefits

It has not been possible to provide a headline estimate of monetised benefits of this policy due to the nature of the additionality of this legislation. Category 1 hazards must already be rectified, so we cannot count the related benefits (e.g., NHS savings or wellbeing benefits). Additionality occurs where repairs are brought forward, however, this will typically only be a short period.

[16] https://www.gov.uk/government/collections/english-housing-survey-2023-to-2024-headline-findings-on-demographics-and-household-resilience
[17] https://www.notifications.service.gov.uk/pricing/letters
[18] 80858-ODPM-Housing-PFI-Cover
[19] https://www.gov.uk/government/statistics/tenant-satisfaction-measures-202324

However, we do know that some hazards are not being rectified for periods stretching into years as per case studies from the Housing Ombudsman Service. As noted in the Monetised costs section above, there will be additional benefits to society where repairs are currently not taking place. These will occur as a result of greater repairs and maintenance activity from social landlords than would have otherwise occurred. The BRE estimate that category 1 level damp and mould costs the NHS £9.8m per year (equating to an average of £521 per incidence).[20] The additional costs to remediate these hazards would, on average, be recouped by society (in the form of NHS savings) in just under two years, equating to a net positive benefit to society over the appraisal period[21]. We are unable to include such monetised benefits within the Net Present Social Value given lack of quantitative evidence with which to establish a robust counterfactual.

There will also be additionality where high-scoring Category 2 hazards are rectified and this benefits a tenant because of their specific health concerns. While such benefits will occur, it is not possible to aggregate an infinite number of counterfactual scenarios concerning different types and severities of hazards with different types of tenant vulnerability. Even at an aggregated level, published data on category 2 hazards is not available in the same granularity as category 1 hazards.

Impact on new supply

There is uncertainty on the exact share of costs that would have been invested in new supply in the absence of Awaab's Law. Here we present scenarios where 50-100% of the costs would have been invested in new supply. These parameters represent our lower and upper bounds, with 75% being the midpoint.

This approach is likely to underestimate the impact on supply for two reasons: 1) it only estimates the impact on PRP supply, and 2) the approach captures the impact of spending on Awaab's Law vs supply, but doesn't take into account the reduction in financial capacity as a result of the reduction in income due to the lower supply.

The vast majority of new social supply is delivered by PRPs rather than local authorities, with PRPs responsible for 79% of new affordable housing delivery in 2023-24 compared to 14% by LARPs (2% unknown)[22]. As such, only the costs to PRPs have been used to calculate the value of the potential reduction in supply as a result of Awaab's Law. Based on total undiscounted PRP costs (minus familiarisation) of £105m to 2034 (in 2025 prices), we estimate based on our central assumptions that spending on Awaab's Law may result in 400-800 fewer homes being delivered across the period which are valued, using land value uplift approach set out in the MHCLG appraisal guide[23], at £34.3m.

Non-monetised benefits

The following sets out further perceived benefits of Awaab's Law on the social rented sector. The majority of the benefits will apply to tenants, society in general and government and the taxpayer and thus is laid out as such. Social landlords and other businesses, such as tradespeople, will likely see less benefit but still some wide-reaching positive impact.

In what we have taken to be the median case (based on incomplete data) repairs being conducted slightly quicker will not result in significant benefits for society. However, where landlords are not adhering to current standards and repairs are either taking place over a much longer time period or not at all (as reported in qualitative data from the Housing Ombudsman Service), Awaab's Law will result in benefits. We are unable to quantify this given lack of quantitative evidence.

Repairs of category 1 hazards result in a number of benefits, such as annual NHS savings[24]. For example, remediation of all damp and mould (at category 1 level) in the social rented sector would be estimated to save the NHS £10m per annum (2019 prices). Such remediation would likely also result in productivity

[20] https://files.bregroup.com/corporate/BRE_cost%20of%20poor%20housing%20tenure%20analysis%202023.pdf
[21] Note that this does not account for other benefits, such as those to wellbeing or productivity. The 'payback' time required is therefore likely to be shorter.
[22] There is no information on the remaining 5% of units. – https://www.gov.uk/government/statistics/affordable-housing-supply-in-england-2023-to-2024/affordable-housing-supply-in-england-2023-to-2024
[23] https://www.gov.uk/government/publications/the-mhclg-appraisal-guide
[24] BRE_cost of poor housing tenure analysis 2023.pdf

gains. ROSPA has valued lost output due to home accidents at between £3,000 and £6,700 (2009 prices), dependent upon their severity[25].

For completeness, we would also need to consider the associated costs of addressing these hazards. While these would not be additional from a legislative perspective (as registered providers are already obligated to remediate category 1 hazards due to the current DHS), the costs would be additional if repairs are not going ahead. The cost of remediating such hazards varies significantly dependent on the type of hazard and its severity – for example, remediation of category 1 level damp and mould in the social rented sector is estimated to cost an average of £985 per dwelling[26].

Given the ongoing nature of attributable benefits, such remediation would result in net benefits to society during the appraisal period[27].

Qualitative summary

Tenants

Health and wellbeing

The new requirements under Awaab's Law will have particular benefit to the health of the tenants living in socially rented homes.

Works will have to prevent the hazard from reoccurring. For example, in cases of damp and mould, social landlords will be required to not only remove hazardous mould spores but to address the root cause of the dampness (for example through installing insulation and ventilation measures) to prevent mould growth from recurring.

The World Health Organisation is of the opinion that damp and mould can exacerbate pre-existing conditions, including chronic obstructive pulmonary disease, and increase the risk of infection.[28]

A survey by Citizens Advice found that 70% of tenants in the rented sector had experienced cold, damp or mould in a property[29] they had rented with 8% saying that this had made a previous respiratory illness worse.

Damp and mould can pose an even greater danger to vulnerable individuals, such as children, older people, and people with weaker immune systems. For example, the Marmot Review Team[30] found that children living in damp, mouldy homes are between 1.5 and 3 times more prone to coughing and wheezing – symptoms of asthma and other respiratory conditions - than children in dry homes.

Damp and mould are not the only hazardous conditions that can have detrimental impacts on residents' health and safety in social housing. The most common hazards according to the Building Research Establishment (BRE) are unsafe stairs, falls, overcrowding, excess cold, and damp and mould growth[31]. BRE estimate that around 217,000 social rented homes have the most serious HHSRS hazards, costing the NHS approximately £65 m per year. English Housing Survey analysis showed that households living in a poor-quality home are more likely to contain at least one member with a long-term illness or health condition. The most common types of illnesses or disabilities in 2023-24 were mobility issues (56%), stamina issues (including breathing or fatigue problems) (45%) and mental health issues (38%).

Mental wellbeing

Tenant's mental health and wellbeing is likely to be positively impacted by the legislation.

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[25] Re-valuation of home accidents PPR483. Note that not all category 1 hazards will result in harm – therefore, only a proportion of these benefits may occur where repairs are brought forward.
[26] BRE cost of poor housing tenure analysis 2023.pdf
[27] BRE cost of poor housing tenure analysis 2023.pdf, See, for example, Table 4, column 'Payback (years)'
[28] WHO Guidelines for Indoor Air Quality: Dampness and Mould
https://apps.who.int/iris/bitstream/handle/10665/164348/9789289041683-eng.pdf?sequence=1&isAllowed=y

[29] Citizens Advice "Damp, Cold and full of mould "The reality of housing in the private rented sector"", 2023
[30] Marmot Review Team, "The Health Impacts of Cold Homes and Fuel Poverty", 2011,
https://www.instituteofhealthequity.org/resources-reports/the-health-impacts-of-cold-homes-and-fuel-poverty/the-health-impacts-of-cold-homes-and-fuel-poverty.pdf

[31] The cost of poor housing in England by tenure, BRE 2023

Although research shows that tenant's mental health and well-being is significantly affected by housing disrepair, and in turn, increased repairs and maintenance standards can be expected to improve mental health and well-being, it is very challenging to measure in this context.

Remedying disrepair in a timely manner often means a person's pride of place is heightened and tenants feel happier to be at home.

We know that damp, mould, and excess cold (which will be brought under Awaab's Law in a future phase) hazards can have a negative impact on mental health, causing what researchers from the University of Ulster called "sub-optimal mental wellbeing", caused by stressors associated with being unable to afford solutions to adverse living conditions. These stressors include low income, fear of debt, damage to possessions from damp and mould, stigma, and social isolation.[32] A 2021 survey by Shelter found that for 1 in 5 UK adults, housing issues had caused a negative impact on respondents' mental health in the previous five years and 3 in 10 of those had had no issue with their mental health previously. 38% of the housing concerns cited were in relation to the repair or condition of the property.[33]

Having reports of hazards being dealt with quickly by landlords will address the frustration residents often feel as a result of not being heard by their landlord. Having hazards addressed in one's home is also likely to reduce anxiety associated with feeling unsafe in one home or concerns over the health of vulnerable occupants, particularly children. Finally, the new requirements under Awaab's Law will offer peace of mind to tenants that when they report an issue in their home that is impacting their health and safety, landlords will investigate and remedy that issue swiftly, and if the landlord fails to, tenants can seek redress.

Improved experience of the repairs and maintenance services provided by social landlords.

We know from the Grenfell Inquiry, the Coroner's report on the death of Awaab Ishak and the social housing green paper consultation that some social tenants feel their concerns are not listened to by providers. As a result of this policy, social landlords will be legally required to respond to any reports of hazards in their home within a fixed timeframe, and keep tenants informed with regard to the hazard(s) in their home and the action landlords will take to rectify the hazard(s) and by when. This will improve the repairs and maintenance service that tenants receive, and make sure they feel heard, and their issues taken seriously.

Education

Poor quality housing has long been considered a barrier to children achieving their educational potential regardless of tenure. School-Home Support states that the proportion of children citing housing concerns as an obstacle to attending school rose by 73% between the 2021/22 and 2022/23 academic years.[34] Research from 2013 found that children living in poorer quality housing was associated with lower average reading and maths skills among adolescents.[35] Children in these dwellings may also be more susceptible to injuries or illness, reducing attendance and educational attainment. Improved education attainment from greater housing quality is expected to improve future prospects, with the Department for Education estimating that a one-grade improvement in overall GCSE attainment is associated with an £8,500 increase in present value lifetime earnings. It is not possible to isolate such an impact to Awaab's Law, and therefore monetise the benefit, due to insufficient data and concurrent, complementary regulations (e.g. DHS). However, the faster repairs required under Awaab's Law should make a positive difference in this respect.

[32] 'Health inequalities: Cold or damp homes' research briefing by Balogun, Rankl and Wilson, 2023
https://researchbriefings.files.parliament.uk/documents/CBP-9696/CBP-9696.pdf

[33] "The impact of housing problems on mental health by Shelter, 2017
https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/research_the_impact_of_housing_problems_on_mental_health#:~:text=1%20in%205%20English%20adults,impact%20upon%20their%20mental%20health

[34] Guardian article, 14 May 2023
https://www.theguardian.com/education/2023/may/14/poor-housing-a-growing-barrier-to-school-attendance-in-england-charity-reveals

[35] The impact of homelessness and bad housing on children's education', Shelter 2018
https://assets.ctfassets.net/6sxvmndnpn0s/AZvOBS2tanDweEV0cKiiP/71a9a9d622c24680c358fb49b7c7094c/Teachers_Research_Report.pdf

Clearer route to redress for residents

Under existing legislation, social tenants can challenge their landlords for failing to action repairs and to keep their homes fit for human habitation, however it is not easy to understand their rights and how long is reasonable to wait for their landlords to take action. Introducing timescales will make this clearer for residents and they will be better empowered to exercise their rights to a safe home as a result.

In addition, there is likely to be reduced strain on the Housing Ombudsman Service as a result of reforms. As landlords get better at addressing cases, we expect to see fewer cases being taken to HOS. This should mean faster resolutions for tenants.

Energy efficiency

Quicker repairs which remediate hazards in a way that improves energy efficiency, such as windows/door frames in disrepair, will likely result in benefits to tenants. Energy efficient homes enable tenants to heat their homes more affordably, achieving bill savings as well as increased warmth and comfort for tenants.

Government and the taxpayer

Savings to the NHS

The BRE report 'The cost of poor housing in England by tenure' quantifies the cost burden to the NHS caused by hazards arising from poor quality homes (of all tenures) in England.

Their 2023 report found that poor housing (homes with one or more category 1 hazard) could cost the NHS £1.0bn a year in treatment bills.

It is estimated that the total cost to society of poor housing in England is around £18.5bn per annum. The payback period is estimated by dividing the cost of remedial work by the savings that will fall to society if the hazard is mitigated. If all remedial work could be undertaken now, it is estimated that it would pay back the full societal costs within a year.

According to BRE's analysis, more than half (£857m) of this annual NHS treatment bill can be attributed to defects in poor homes which expose residents to excess cold, whilst the second biggest cost to the NHS comes from hazards which cause people to fall and injure themselves, predominantly on staircases. Both issues are particularly dangerous for the most vulnerable in society, such as older people and families with young children.

The most common category 1 hazard is the risk of a fall on stairs, (for example) caused by disrepair to or a lack of a handrail or balustrade, with over 1 million such cases recorded in 2018. Fixing this issue alone would save the NHS £219m a year in treatment costs.

Dampness is also a common and costly issue for the NHS, with 75,000 homes in England suffering from the most serious dampness in 2018, leading to a £38m annual bill for the NHS. In addition, there are many more homes with category 2 dampness (less serious) which have an impact on people's health.

Registered providers of social housing

Saved costs of future retrofitting

The requirement on social landlords to complete repair works satisfactorily may result in a longer-term reduction of repair costs in the future. If repairs are conducted more promptly, it can prevent issues from further exacerbating and resulting in higher repair costs (for example addressing a leak promptly will reduce further work associated with damp and water damage).

Society

Productivity

If someone has a serious injury in the home, they are often unable to work whilst recuperating. Injuries consequently reduce national productivity and by reducing the number of injuries that occur in homes, society can benefit due to improved labour productivity. The faster removal of hazards in social homes under Awaab's Law should therefore result in improved labour productivity.

Economic

New requirements under Awaab's Law may see an increased demand for construction and other skilled workers in local areas, which will increase work for local tradespeople and manufacturers. This in turn will cause a rise in money circulation, benefiting the local economy.

The additional staff taken on by PRPs to assist with the administration of Awaab's Law (driving the majority of the monetised cost) will carry the same benefit, though it should be highlighted that employment impacts are rarely additional and may represent deadweight loss, with workers moving from elsewhere.

Direct costs and benefits to business calculations

The costs associated with meeting Awaab's Law would be the responsibility of social landlords to meet.

Social landlords include local authority landlords and private registered providers (such as not-for-profit housing associations, co-operatives, and for-profit organisations). For the purpose of the equivalent annual net direct cost to business and Business Impact Target assessments, only the costs and benefits associated with private registered providers have been considered, as local authorities are not in scope of EANDCB and BIT assessments.

The direct impacts to business are therefore the estimated costs to PRPs of additional staffing, familiarisation, and postage and preparation of summaries, as set out above. There are no monetizable benefits to PRPs. This results in a business NPV of £-92.7m and a net direct cost to business per year of £10.8m (2025 PV, 2025 prices).

Risks and assumptions

The impacts of Awaab's Law regulations are uncertain, due to a lack of available data. Whilst the analysis in this Impact Assessment is informed by the best evidence available, several assumptions have been made around existing behaviour of providers and how this will change. Below, we have clearly set out the assumptions underpinning the modelled impacts in the above sections.

Additional staff costs

The estimates for additional staff costs provided below may over- or under- estimate for different reasons. These costs may overestimate due to policy changes, post-consultation. First, the consultation was based on calendar, rather than working days. While we have been able to amend costs in relation to preparing written summaries downwards to reflect this, we are unable to amend additional staff costs in the same way due to lack of granularity within the data.

Second, the cost estimates for additional staff are based on information provided by registered providers during consultation, given the absence of applicable published data. These estimates therefore reflect the policy position at that time, which required hazards to be investigated in 14 calendar days, and work started in a further 7. However, this has since changed. Firstly, responses to the consultation will have factored in all three phases of implementation whilst these regulations will only cover the first phase. Further, the policy now requires work to make the hazard safe to done in 5 working days of the investigation concluding, with work to prevent it recurring starting as soon as possible, with a 12-week backstop for physically beginning works. This allows greater flexibility for registered providers and will work to alleviate constraints in e.g. labour or materials. Given this backstop, most registered providers will now already work within these new timeframes (see NHF survey below), which implies that these cost estimates may significantly overestimate.

In addition to the policy changes, we also do not account for any reduction in the overall number of Category 1 hazards, either in a counterfactual or as a result of the policy. According to the EHS[36], the number of social rented sector households containing at least one Category 1 hazard has reduced from 243k to 177k in the last ten years, equating to a compound annual growth rate of -3.2%. However, it would not be robust to assume that this reduction will continue at the same rate, primarily due to underlying data[37] and behavioural changes within the sector[38].

[36] https://www.gov.uk/government/statistics/annex-tables-for-english-housing-survey-2023-to-2024-headline-findings-on-housing-quality-and-energy-efficiency

[37] Each year contains two years' worth of sampled data; 2020-21, and to a lesser extent, 2022, contain modelled data; yearly differences also may not be statistically significant.

[38] It is possible that increased awareness of quality issues for registered providers and tenants may increase the rate of hazard reduction, however, we may also see a point of diminishing marginal returns.

Any reduction in the number of hazards is likely to be compounded by the upskilling of staff. Providers and their staff may also become more adept at remediating hazards and navigating processes, and so staffing costs may be (significantly) lower in year 10 compared to year one.

On the other hand, these cost estimates may under-estimate. First, due to changes post-consultation, most notably the government's changes to National Insurance Contributions from employers, which will impact registered providers. In addition to this, while we feel it is reasonable to assume that emergency hazards will not accrue additional costs (given current targets[39], as discussed in the Monetised costs section), there may be additional costs where this results in supplementary works. It has not been possible to disaggregate the data gained at consultation to account for this – there are therefore considered non-monetised costs.

Second, there may be capacity constraints within the sector and its' contracted employment. A greater quality reform agenda combined with supply targets, may increase demand in labour and materials, increasing costs in the short term before markets are able to adapt by increasing supply.

Implementation timeline

As described under 'monetised costs', the cost estimates account for Awaab's Law applying to different hazards at different points in time. This analysis assumes that each hazard corresponds to an equivalent additional cost for social landlords – for example, triaging a repair of damp and mould would cost the same as that for excess cold. It was not deemed appropriate to use the per hazard costs to mitigate hazards within the BRE's analysis[40] as these are not specifically additional to Awaab's Law.

NHF survey

We have used a survey of NHF members to inform some of our assumptions. Table 1 sets out the upper and lower bound of the responses received and the average if this has been used. The survey received a small number of responses (13). Whilst this is the best data we have available and is useful for making estimates, there are limitations to how accurately such a small sample size represents the whole sector. Furthermore, it is possible that landlords will overestimate their performance when self-reporting. We are looking to refine the assumptions it underpins as part of the consultation.

Survey Question	Lower Bound of Responses	Average (when used)	Upper Bound of Responses
How many non-emergency responsive repairs were carried out per property owned in the financial year 2022-23?	1.7	4.2	6.6
What is the average time between a non-emergency responsive repair being brought to the landlord's attention by the resident (or a third party) and the landlord assessing what type of repair work will be required.	<1 day	-	22.0 days
What is the average time between a non-emergency responsive repair being brought to the landlord's attention by the resident (or a third party) and the landlord beginning work to make repairs (I.e. the first day a contractor or operative attends to make repairs)?	8.5 days	-	30.0 days

[39] https://assets.publishing.service.gov.uk/media/673f38f64ebce30ac7baf03b/TSM_Headline_Publication_Final.pdf
[40] https://files.bregroup.com/corporate/BRE_cost%20of%20poor%20housing%20tenure%20analysis%202023.pdf

What is the average time between a non-emergency responsive repair being brought to the landlord's attention by the resident (or a third party) and the date of the repair being completed (as confirmed by a contractor/operative)?	8.5 days	26.1 days	47.3 days

Table 1 - Summary of survey responses

Impact on small and micro businesses *Will the measure impact small or micro businesses (SMBs)? Could SMBs be exempted whilst achieving policy objectives? Would there be any disproportionate burdens on small and micro business?*

Based on the definition of small businesses defined in the Better Regulation Framework guidance, businesses employing between 10 and 49 full-time equivalent (FTE) employees are classified as a small business, whilst businesses employing between one and nine employees are classified as micro businesses. This definition of SMBs does not work well for the social rented sector as social landlords tend to employ few people relative to their housing stock. Therefore, for the purpose of assessing the impact on small and micro businesses in this IA, an alternative definition has been used to identify small and micro social landlords. According to the Better Regulation Framework guidance, local authorities are not SMBs, and therefore, they have been excluded from this assessment.

Evidence from the Regulator has shown that those owning under 1,000 homes meet the employee definition of being SMBs. These landlords collectively own around 5% of PRP stock and 3% of all social rented sector stock. At the time of writing, 1,135 PRPs meet the definition of being a small or micro business.

We recognise that smaller social landlords (who own or manage fewer than 1000 homes) might face distinct challenges in meeting the Awaab's Law timescales. Whilst we did not receive cost estimates from smaller housing providers, we did receive qualitative responses describing specific challenges. For example, they may not have in-house maintenance staff and therefore be more reliant on external contractors, and they do not have the economies of scale which larger providers may benefit from.

Social tenants do not have freedom of choice over who their landlord is and we think all social tenants should receive the same protections. The intention of Awaab's Law is to ensure social landlords respond quickly to reports of hazards in order to protect residents from poor health or safety outcomes, and to empower residents to challenge their landlords if they fail to do so. We therefore do not think that any social landlord, regardless of size, should be exempt from these requirements.

Provisions within Awaab's Law that will mean landlords making their best effort to respond to hazards as quickly as possible will not be found in breach of requirements if a case is brought against them. The landlord will be expected to keep clear records of all attempts to comply with the proposals, including records of all correspondence with the resident(s) and any contractors. This will enable the landlord to provide a record of the reasons that prevented them from complying with the requirements, despite their efforts to do so.

Wider impacts (consider the impacts of your proposals)

Because Awaab's Law implies terms into tenancy agreements and will be enforced by the courts, there is likely to be an impact on the justice system. We expect an increased demand on legal aid services, and a higher volume of cases reaching the courts. We have been engaging with HMCTS and the Ministry of Justice to complete a Justice Impact Test ahead of new requirements coming into force to ensure the impact on the justice system is fully assessed and new burdens appropriately funded.

The public sector equality duty under section 149(1) Equality Act 2010 applies to this decision. We have considered the impact, including any differential impacts on people with protected characteristics, arising from each policy proposal to be of a net benefit to all social housing tenants. We do not consider that there are any negative impacts on equality, and we have considered appropriately the need to advance equality and foster good relations. Research has shown that certain demographic groups, such as children and young people, the elderly and people with pre-existing illnesses are at a greater risk of ill health associated with hazards in the home. Research has also shown that some demographic groups are disproportionately more likely to live in social homes containing category 1 hazards, including households with a lone parent,

low-income households, and households from ethnic minority backgrounds.[41] As research has shown that category 1 hazards disproportionately impact individuals from these groups, we anticipate that Awaab's Law will have a positive impact on addressing this disproportionate impact, by mitigating these hazards.

Under section 19 of the Environment Act 2021, when making policy, Ministers must have due regard to the government's environmental principles policy statement. This includes the principle that policy should seek not only to prevent and mitigate environmental harm, but also to embed opportunities to improve and promote environmental protection and enhancement (the integration principle). When developing this policy, environmental considerations were taken into account in line with the Environmental Principles Policy Statement. Our assessment of environmental effects found that whilst this policy will not impact the natural environment, we consider this policy offers opportunity to improve environmental protection by speeding up rectification of environmental hazards. Given many of the causes of damp will also be causes of energy inefficiency – for example roof leaks and windows/doors in disrepair – there is scope for Awaab's Law to serve as a catalyst for greater energy efficiency. We are not proposing any modification of the policy to address any of the environmental principles.

Monitoring and Evaluation

The need for robust monitoring and evaluation is built into our plan for implementation. We have chosen to take a phased approach to implementing regulations to learn lessons at each stage and make improvements based on feedback from providers and tenants. This feedback will be used to inform the regulations which are laid ahead of implementing Phase 2.

We will assess this policy's impact on the prevalence of hazards in social homes using data collected by the English Housing Survey (EHS).

The Regulator of Social Housing's Tenant Satisfaction Measures (TSM) Standard came into effect in April 2023. This includes a TSM on repairs completed within target timescales, requiring social landlords to report on the proportion of emergency and non-emergency repairs completed within their target timescales. Improvements in tenant satisfaction with repairs can be used in evaluating the impact of new requirements under Awaab's Law.

Under the regulations, the Secretary of State is required to carry out a review of the regulatory provision contained in the Regulations. The first review must be conducted within 5 years. However, the phased approach also gives us an opportunity to evaluate how the policy is being implemented, and we will look to undertake an early review between Phases 2 and 3.

[41] Health inequalities: Cold or damp homes - House of Commons Library (parliament.uk)