

CIH submission to Department for Levelling Up, Housing and Communities' consultation on Awaab's Law

Summary

The Chartered Institute of Housing (CIH) is the professional body for people who work or have an interest in housing. We welcome the opportunity to respond to the Department for Levelling Up, Housing and Communities' (DLUHC) consultation on Awaab's Law.

In preparing our response to this consultation, we have consulted extensively with CIH members working in a range of different roles across the housing sector. This includes CIH members working in repairs and maintenance services and broader asset management directorates, as well as members working in different roles across housing associations, local authorities, and the private sector. We have also consulted with other partner organisations across the housing, fuel poverty, and environmental health sectors to inform our view. We have responded to all questions in the consultation, and hope that the evidence and input we provide can support the finalisation and timely introduction of Awaab's Law.

We have responded to individual questions below, but our main points across our response are:

- We agree with the principle of setting the scope of Awaab's Law to include additional HHSRS hazards beyond damp and mould growth, but we do not necessarily agree that it should *automatically* apply to all HHSRS hazards beyond damp and mould growth. Instead, we would welcome an assessment of each individual hazard to make an evidence-based determination on whether it should fall under the scope of Awaab's Law, or if it is more appropriately dealt with through other existing policy, legal, and/or regulatory frameworks.
- While we support the setting of binding timescales for social landlords to investigate hazards, begin repair works, and provide written summaries to residents with a minimum information requirement, we believe this would be most appropriately set in working days not calendar days. This would align with existing policy and legislation in the sector and ensure that landlords can consistently meet the required timescales across the calendar year.
- We agree with additional proposals set out in the consultation, specifically:
 - That medical evidence should not be required for an investigation
 - The proposed interpretation of beginning repair works
 - The requirement for landlords to satisfactorily complete repair works within a reasonable time period

- The setting of timescales for emergency repairs in legislation, and that landlords should be required by law to action emergency repairs as soon as practicable and, in any event, within 24 hours
- That landlords should arrange for residents to stay in temporary accommodation if the home cannot be made safe within reasonable timescales.
- Depending on the number of HHSRS hazards that are included in the finalised proposals, our engagement with the sector indicates that social landlords will require clear guidance to understand when the threshold has been met to trigger Awaab's Law for different hazards, and for different groups of residents. We recommend that guidance is produced for each HHSRS hazard included in the finalised proposals for this purpose.
- In addition to the above, landlords will require clarity as soon as possible on the proposed implementation timelines and any transitional period to full compliance.

Lastly, while we broadly support the proposals outlined in the consultation, as they currently stand we have wider concerns that DLUHC is underestimating the range and cost of actions that social landlords feel they will be required to take to comply with them. Our members have indicated they may need to recruit additional staff to ensure they can be compliant, provide widespread training to a large number of staff members and service providers on identifying vulnerability and its relation to each hazard to a degree that is appropriate and proportionate to their role, and significantly increase the amount of out-of-hours work they and their service providers will need to undertake to meet timescales.

While we acknowledge that these actions may be considered necessary, they are not reflected in the impact assessment, which assumes minimal cost implications for all but one of the proposals. Feedback from our members suggests that it is very likely the cost implications of the policy will be significant, not minimal. Beyond this, we have reservations about other parts of the impact assessment, especially the apparent omission of local authorities and ALMOs from the evidence base that underpins it. We would like to see DLUHC undertake further work in collaboration with the sector to complete a full, updated cost assessment on the likely costs of these proposals, or any amended proposals brought forward.

Responses to consultation questions

Question 1. Do you agree that Awaab's Law should apply to all HHSRS hazards, not just damp and mould?

No. Please see our responses to Question 2 and Question 3.

Question 2. Do you agree the right threshold for hazards in scope of Awaab's Law are those that could pose a significant risk to the health or safety of the resident?

No. While we agree with the principle of setting the scope of Awaab's Law to include additional HHSRS hazards beyond damp and mould growth, we do not agree that it should automatically apply to all HHSRS hazards.

Beyond damp and mould growth, we believe that an assessment of each individual hazard is required to make an evidence-based determination on whether it should fall under the scope of Awaab's Law, or if it is more appropriately dealt with through other existing policy, legal, and/or regulatory frameworks. Please see our response to Question 3 below.

Question 3. If you have answered 'no' to any of the questions in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text).

We agree with the principle of setting the scope of Awaab's Law to include additional HHSRS hazards beyond damp and mould growth. [Evidence](#) from the Social Housing Quality Resident Panel report into repairs, maintenance, and Awaab's Law clearly shows that residents feel other hazards should be within scope, especially structural collapse and falling elements; electrical hazards; asbestos; and excess cold.

Wider evidence also indicates that many of these hazards are prevalent across the social housing sector, in some cases, potentially more so than damp and mould growth. Modelling [analysis](#) undertaken by the Building Research Establishment, for example, estimated that in 2019 there were 22,615 excess cold hazards in social rented homes, compared to 18,764 damp and mould growth hazards. Excess cold poses a [significant risk](#) to the health and safety of residents, especially to older people during winter or periods of cold weather. Furthermore, although excess cold (as defined in the HHSRS) should not be uncritically conflated with fuel poverty, there is a significant quantity of other [evidence](#) that living in a home that cannot be kept adequately warm is associated with the exacerbation (and in some cases causation) of cardiovascular, respiratory, and musculoskeletal conditions, as well as mental ill-health.

While considerable good practice exists in the sector already on addressing excess cold hazards (e.g. fixing or replacing broken boilers within 24 hours), previous [work](#) by the Housing Ombudsman has identified cases where residents have been left without heating and hot water for substantial periods of time, sometimes several months, waiting for a repair. They [highlighted](#) the "promptness of landlords' actions, given the significant impact

of problems during the colder winter months” as a significant concern, finding maladministration in 55 (30 per cent) of 182 complaints they investigated about heating and hot water supplies. We therefore acknowledge that a cogent case can be made for inclusion of excess cold – and potentially other hazards – within the scope of Awaab’s Law to provide a backstop for the small proportion of serious repairs not being undertaken in an appropriate timescale.

However, there is a possibility that including all HHSRS hazards within the scope of Awaab’s Law may create approaches and outcomes that are optimal for neither resident nor landlord. Some Category 1 HHSRS hazards, especially those falling within Psychological Requirements (Section B), are often influenced by external and structural factors that may be beyond the control of individual social landlords to fix. It is not clear to us, for example, how noise hazards could be adequately addressed by repair works under Awaab’s Law. The Housing Ombudsman’s [spotlight report](#) on noise highlights that most noise complaints made by social housing residents relate to household noise (e.g. movement, intermittent music, or washing machines running at night). Often, these kinds of household noise are not straightforwardly within the remit of the landlord (e.g. they come from adjacent homes that are not social housing) and can still affect an occupant even if the landlord has taken all preventative measures set out in the initial HHSRS [operating guidance](#) (e.g. adequate insulation, appropriate siting of plumbing pipes, double or triple glazing).

Instead, noise often requires a much more strategic approach to properly address, underpinned by anti-social behaviour and neighbourhood management policies. In its [recommendations](#) to the sector, the Housing Ombudsman noted that landlords should have a clear suite of options for addressing noise (e.g. mediation, community building events), and distinct processes, linked to good neighbourhood management and anti-social behaviour policies, to decide which options are most appropriate in each case. They also acknowledged that multi-agency partnerships are critical to effectively tackling noise, noting that relationships with police and environmental health often need to be cultivated and established to tackle specific cases appropriately. These good practice approaches to tackling noise do not align straightforwardly with the proposed meaning of ‘beginning’ repair works as *“a worker being on site physically starting to repair and rectify a hazard”*.

It is therefore not clear to us how bringing noise within the scope of Awaab’s Law and considering it a hazard in the home that requires repair, would improve the ability of social landlords to effectively address it. Landlords would require clear guidance that some good practice approaches (e.g. beginning a mediation process) would fall under the definition of beginning repair works and be acceptable under Proposal 3. These challenges are not just limited to noise hazards; for example, the overarching cause of overcrowding and space issues is a lack of genuinely affordable homes provided for

social rent in England. It is not clear to us how social landlords would be able to adequately address overcrowding through repair works under Awaab's Law in the absence of a sufficient number and quality of homes to house people in a way that met their needs and preferences.

Beyond this, there is insufficient evidence from DLUHC's prior work that social housing residents feel that all HHSRS hazards should be given equivalence under Awaab's Law. The Social Housing Quality Resident Panel [report](#) into repairs, maintenance, and Awaab's Law only specified the top 5 hazards that panel members thought should be covered under the law. No evidence was published regarding any hazards that panel members thought should not be covered under Awaab's Law, or that they were not sure about. We have also received feedback from some social landlords, based on engagement they have undertaken with residents on the Awaab's Law proposals, that their residents do not necessarily feel all 29 hazards should be prioritised in the same way. For example, one landlord shared data with us showing that approximately two thirds of residents who responded to a survey they carried out believed prioritisation should depend on the specific hazard in question.

To be clear, in making these points we do not seek to minimise the damaging impacts of certain HHSRS hazards, and we acknowledge the significant harms that (e.g.) noise and overcrowding often cause to the physical and mental health and wellbeing of social housing residents. All HHSRS hazards should be dealt with properly and in a timely manner. However, it is not clear to us why, for example, a legally compliant noise complaints policy that attempts to operationalise the good practice in the Housing Ombudsman's spotlight report would achieve better outcomes if the timescales and requirements of Awaab's Law were added to it. It is equally unclear as to the extent to which this would reflect the priorities of social housing residents, who in [some cases](#) will be helping their landlords to review and co-design noise complaints policies through scrutiny work.

Summarily, we are not specifically arguing for the inclusion or exclusion of these hazards within the scope of Awaab's Law; they are used as illustrative examples to make a wider point that equivalising all hazards under Awaab's Law may not necessarily be appropriate, reasonable, or aligned with good practice. Accordingly, we feel that if additional hazards beyond damp and mould growth are to be included within the scope of Awaab's Law over and above existing legal, policy, and regulatory frameworks, there needs to be a firmer justification for why these hazards, particularly those falling under Physiological Requirements (Section B) of the initial HHSRS guidance, should be given equivalence to hazards such as damp and mould growth. We would welcome an additional assessment that looks at each hazard individually and makes an evidence-based determination on their inclusion or exclusion from the remit of Awaab's Law. We also recommend that for those HHSRS hazards that are subsequently included within the scope of Awaab's Law

following this process, there must be clear guidance issued to social landlords to help illustrate examples of where specific HHSRS hazards may, or may not, be deemed to pose a significant risk to the health and safety of a resident. This could take the form of guidance like the recently [issued](#) *Understanding and addressing the health risks of damp and mould in the home*, but for all hazards assessed to be within the scope of Awaab's Law. Finally, we would welcome further guidance for the sector regarding how Awaab's Law will correspond with future changes to the HHSRS guidance and Decent Homes Standard, both currently under review, as this will impact upon organisational planning for how each hazard must be assessed and rectified.

Question 4. Do you agree with the proposal that social landlords should have 14 calendar days to investigate hazards?

No, we do not agree. Please see our response to Question 6 below.

Question 5. Do you agree that medical evidence should not be required for an investigation?

Yes, we agree.

Question 6. If you have answered 'no' to any of the questions in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text)

While we agree with the proposal to include timeframes for investigating potential hazards, feedback we have received from members and the wider sector has indicated that the prescribed 14 calendar days is not reasonable or practicable for landlords to action. The inclusion of non-working weekend days could reduce the allowed timeframe down to 10 working days, or potentially shorter over specific periods of the year (e.g. bank holiday weekends). It may also be challenging for landlords to begin or continue necessary investigations over weekends due to third-party contractor working hours. Instead, we recommend that the timeframe for investigation is based on working days, not calendar days. This would be more in line with current repairs policies for landlords, and align with existing legislation and practice for ALMOs and local authorities. Existing legislation (e.g. The Secure Tenants of Local Housing Authorities (Right to Repair) Regulations 1994) is based on working days and the use of working days is therefore an established principle on which repairs are arranged and undertaken in the social housing sector, with out-of-hours work primarily reserved for emergency repairs.

In relation to the medical evidence provided for investigations, we agree that this should not be required. There is a possibility that it would provide barriers and delays for residents, especially if they have to wait for action from a medical professional to provide

evidence of any relevant health conditions or vulnerabilities. However, staff and contractor training will be required across the sector to improve their ability to understand and assess relevant health conditions and vulnerabilities. While we feel any final determination on what constitutes a significant risk to the health and safety of a resident should be made by a competent professional, landlord staff and contractors will require training to understand vulnerability and its relation to the regulations to a degree that is appropriate and proportionate to their role. This level of training across the sector will take time to design, issue, and implement within all relevant teams in an organisation.

Furthermore, as previously noted, the sector will require detailed guidance on each of the hazards included under Awaab's Law to outline how hazards may be identified, what the possible health risks are, and any groups that may be more vulnerable for each hazard. This could be similar to previous [guidance issued for health risks associated with damp and mould growth](#). Likewise, assessing vulnerabilities and health risks without medical evidence will be partly dependent on the data held by landlords about their residents. The [Better Social Housing Review \(BSHR\)](#) identified gaps in knowledge related to the data held by the social housing sector, particularly for the quality of properties and wider performance measurements. Work is underway in the sector to respond to this, especially through the [Knowing Our Homes](#) project being led by the National Housing Federation, but this will take time. Additionally, it is less than clear that residents will universally consent to sharing personal data about their health conditions and vulnerabilities with their landlord. Even if this data can be comprehensively obtained, the sector will require guidance to understand the specific instances where the threshold for triggering Awaab's Law has been met for each hazard, and how this may impact different groups of residents, in order to best assess the risks.

Question 7. Do you agree with the proposal for registered providers to provide a written summary to residents of the investigation findings?

Yes, we agree.

Question 8. Do you agree with the minimum requirements for information to be contained in the written report?

Yes, we agree.

Question 9. Do you agree registered providers should have 48 hours to issue the written summary?

No, we do not agree. Please see our response to Question 10 below.

Question 10. If you have answered 'no' to any of the questions in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text)

The use of written reports for residents will provide consistent and clear communication related to the hazard reported and next steps, as well as potential risks. However, there are instances where this may not be reasonable or practicable, and this proposal may result in adverse impacts on staff working additional hours (e.g. over weekends) as well as opening the possibility of unintended consequences, whereby the accuracy and accessibility of the reports that residents receive is compromised because landlords are focusing on meeting the timescale. One example raised by our members is when investigations are completed on a Friday afternoon, this would require the report to be issued to the resident by the Sunday afternoon. In this case, there would be increased working hours for staff over the weekend, and a limitation on the information that can be provided by third-party contractors and assessors over the weekend period. Without the communication and information required to outline the hazard, potential impacts, and next steps, as well as potential challenges in scheduling repairs appointments, it is possible that there will be an impact upon the accuracy and accessibility of the report for the resident.

We therefore propose that the requirement be amended to 2 working days, rather than 48 hours, similar to investigation timeframes. This would allow landlords the time to effectively gather the necessary information to update the resident from both internal and external colleagues, and would not impinge upon timescales for emergency repairs.

Question 11. Do you agree with the proposal that if an investigation finds a hazard that poses significant risk to the health or safety of the resident, the registered provider must begin to repair the hazard within 7 days of the report concluding?

No, we do not agree. Please see our response to Question 14 below.

Question 12. Do you agree that in instances of damp and mould, the registered provider should take action to remove the mould spores as soon as possible?

Yes, we agree.

Question 13. Do you agree with the proposed interpretation of 'begin' repair works?

Yes, we agree.

Question 14. If you have answered 'no' to any of the questions in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text)

We support the principle of including timeframes for landlords to begin repair works. However, as above, we recommend that this is set to 7 working days, rather than calendar days.

As discussed in our previous responses, setting this timeframe in calendar days may not be reasonable or practicable in all cases, as works will require collaboration with third-party contractors who may not operate over weekends, other than emergency repairs and out-of-hours teams. This may particularly be the case for specialist contractors, where cases will require specialised skills to rectify the hazard and address its fundamental root cause to avoid recurring issues for the resident.

With an increase in demand for these limited specialised skills, their unavailability over non-working days could mean that landlords are reduced to 5 working days to begin works in the proposed timeframes. This may cause issues in scheduling repairs, particularly at times that are convenient for residents (which may impact instances of no access), and may cause unintended consequences and delays for other repairs that do not fall under Awaab's Law in order for the landlord to remain compliant. Thus, while we agree that landlords should have timeframes to begin works, this should follow existing policy and legislation and be set out in working days to ensure that landlords can begin the required works appropriately.

In addition, we agree with the proposed interpretation of beginning works in the consultation. However, greater clarification is required for cases that involve specific health conditions or vulnerabilities, such as mental ill-health. In such instances, prior engagement with the resident is a necessary first step towards rectifying a hazard, and can take time to undertake in a way that is suited to their needs and requirements. For example, one group of possible cases raised by our members involves hoarding. Hoarding can be linked to multiple HHSRS hazards (e.g. fire, domestic hygiene, and personal hygiene), and can restrict safe access to parts of the home that might be required to fix other hazards (e.g. a broken boiler under excess cold). In such scenarios, it may take landlords a considerable amount of time to appropriately work with a resident before beginning a repair. Accordingly, landlords will require guidance on how to approach mental ill-health and resident engagement activities as they relate to beginning repair works, and they will need assurance that some good practice approaches that take time (e.g. beginning to work with social care services to address hoarding) will constitute a beginning of repair works, or be included within grounds for a reasonable defence.

Question 15. Do you agree that the registered provider must satisfactorily complete repair works within a reasonable time period, and that the resident should be informed of this time period and their needs considered?

Yes, we agree.

Question 16. If you have answered 'no' to the question in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text)

We agree with the proposal and with the principle of not prescribing a timescale for completing repair works. The time taken to complete repair works can vary significantly according to the scale and complexity of the works, and also risks an unintended consequence whereby the primary focus is on the speed of repairs rather than their quality.

We would add that landlords and residents will require guidance and clarity on what constitutes a 'reasonable time period'. If they are included in the finalised proposals, feedback from our members and wider engagement with the sector indicates that this will be especially important to ensure that all works are completed fully and the root causes are resolved, to avoid prolonged delays or recurring issues. Issuing appropriate guidance will ensure that landlords can effectively plan for future works, as well as providing a more accurate schedule of works for residents in written reports. This will enable residents to hold their landlords to account on any delays and allows residents to set expectations for their landlords as outlined in the guidance. We recommend that guidance on the definition of 'reasonable time period' be developed for each HHSRS hazard that is included in the finalised proposals.

Question 17. Do you agree that timescales for emergency repairs should be set out in legislation?

Yes, we agree.

Question 18. Do you agree that social landlords should be required by law to action emergency repairs as soon as practicable and, in any event, within 24 hours?

Yes, we agree.

Question 19. If you have answered 'no' to any of the questions in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text)

We agree with Proposal 5 related to emergency repairs. This largely follows existing policies for emergency repairs, as per our member feedback.

Question 20. Do you agree that landlords should arrange for residents to stay in temporary accommodation (at the landlord's expense) if the property can't be made safe within the specified timescales?

Yes, we agree.

Question 21. If you have answered 'no' to the question in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text)

We agree with Proposal 6 as it relates to moving residents to another property ('decanting') to ensure their health and safety. Many landlords have a standard policy for this and understand this requirement as it pertains to existing legislation.

However, it is important to note the limited supply and availability of decant accommodation, and the potential impacts of this proposal on overall social housing supply. The pressures on temporary accommodation are widely understood. [Recent government data](#) shows that 109,000 households were in temporary accommodation as of September 2023, with increasing pressures since. There are [1.28 million households](#) in England on council waiting lists for social housing amid these rising homelessness levels and a [27 per cent increase in rough sleeping](#). Despite these pressures, there is a concerning lack of development of social housing in the UK. CIH's [housing strategy](#) and the [UK Housing Review](#) demonstrate that England continues to underinvest in housing development and that the supply of social homes lags far behind the volume needed to meet demand. In order to meet increasing pressures for providing residents with alternative accommodation under Awaab's Law, there must be investment in the development of new homes to meet this growing need.

Question 22. Do you agree that Awaab's Law regulations should include provisions for a defence if landlords have taken all reasonable steps to comply with timeframes, but it has not been possible for reasons beyond their control?

Yes, we agree.

Question 23. If you have answered 'no' to the questions in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text)

We have nothing to add here.

Question 24. Do you agree with the assessment that proposals 1, 3, 4, 5, 6 and 7 will create small net additional costs to the sector?

No, we do not agree.

Question 25. If not, please can you provide additional information? (Free text)

We agree with some of the cost assessments made in the impact assessment. Although difficult to monetise, we agree that the introduction of Awaab's Law will likely lead to significant NHS savings, as well as improvements related to productivity and economic activity. We also agree with the broad assessment that repair volumes will not increase because of the policy.

Social landlords are likely to require more time to provide detailed evidence on the costs of the proposals. However, some of the cost implications that have been highlighted to us in consultation with the sector are:

- Social landlords may need to recruit additional staff to comply with the requirements of Awaab's Law. While we agree that repair volumes will not increase because of the policy, the implementation of timelines will fundamentally change the structure, timings, and rhythm of demand for repairs teams and operatives, and may require some social landlords to recruit additional staff to ensure that they comply with the timescales laid out in the regulations. Larger landlords may be required to recruit in order to issue a significant quantity of written reports per week, whereas smaller landlords may need to recruit to meet expected timeframes or for cases that require more specialised skills.
- The cost impact assessment proposes that 2 hours per staff member will be sufficient for familiarisation purposes. Although dependent on the final proposals adopted, the exact wording of regulations, and the time taken to familiarise staff with any associated guidance, this is likely to be an underestimate.
- Relatedly, it is likely that significant numbers of staff at housing associations and local authorities will require training and upskilling to fulfil the requirements of Awaab's Law, especially in relation to identifying vulnerability and the determination of whether a hazard might pose a significant risk to the health and safety of the resident. While any final assessment should be made by a competent professional, it is likely that other staff will require training to understand vulnerability and its relation to the regulations to a degree that is appropriate and proportionate to their role.
- The lack of proposed transitional or implementation timeframe in the consultation impacts upon the cost analysis available, as this will determine the speed and frequency of training and scaling up of processes required to be compliant.
- Adequately responding to the timescales in calendar days may require an increase in out-of-hours working, which will increase costs. Engagement we have undertaken with the sector suggests this is particularly the case for Proposal 1. Compliance with the timescales may also require the use of specialist contractors

outside of normal business hours, which will come at an additional cost. This cost may vary widely depending on different factors, especially the location of the home in question (e.g. in particularly remote rural areas), the nature of the specialism required, and aggregate increase in demand for some specialist services, which could drive up prices.

- Contracts with existing suppliers and service providers for repairs and maintenance services will in many cases need to be renegotiated and/or reprocured to reflect the new timescales and proposals. This will come with costs associated with the renegotiation and reprocurement itself (i.e. staff time), and with any increases in the value of renegotiated contracts.

Broadly, from the above we would emphasise that the range of actions that social landlords feel they would be required to take to ensure they are compliant with the new regulations are not wholly reflected in the costings and impact assessment. We would like to see DLUHC undertake further work in collaboration with the sector to complete a full, updated cost assessment on the likely costs of these proposals, or any amended proposals brought forward.

Finally, we would welcome clarification on one of the pillars of the cost assumptions in the impact assessment. Specifically, the impact assessment is partly based on data provided to DLUHC by the sector via two surveys, both issued by the National Housing Federation (NHF) to its members, on a) the costs of complying with the proposals, and b) with the 'Provision of information to tenants' Direction to the Regulator. It is stated that this was conducted to inform assumptions on the volume and current speed of non-emergency responsive repairs carried out by the sector. It is not clear whether this survey was distributed only to National Housing Federation members (i.e. a majority - but not all - of housing associations in England), or if it included local authorities and ALMOs. The wording in the impact assessment suggests the former. If this is the case, we would welcome clarification as to the extent the proposals are informed by evidence from local authorities and ALMOs. This is important because [research](#) published by the Local Government Association (LGA) has evidenced significant financial pressures on the individual Housing Revenue Accounts (HRAs) of local authorities, and shown how this is affecting their ability to fund the investment that is required to manage social housing services and deliver improvements and repairs to existing homes.

We acknowledge that the assessment states that the impacts of the proposals are uncertain, and we welcome the statement that part of the intention of the consultation is to refine the underpinning assumptions. Given the above, the views of the local authority sector will be particularly important to adjusting the impact assessment and we encourage DLUHC to work with the social housing sector in its entirety to update the assumptions.

Question 26. Do you agree with the assessment of the net additional costs of proposal 2?

No, we do not agree.

Question 27. If not, please can you provide additional information? (Free text)

While we acknowledge that DLUHC has undertaken a full analysis of the costs associated with Proposal 2, we are not convinced that 15 minutes of staff time per report sent is appropriate. In straightforward cases, this may be sufficient to adequately gather the required information and collate it into a summary for a resident. In other cases, especially multifaceted cases involving specialist contractors, multiple HHSRS hazards, and complex schedules of works, 15 minutes may not be an adequate amount of time to cogently summarise the issues at hand for the resident in a way that is accurate and accessible. We would also expect that summaries of more complex issues may require manager oversight and sign-off, which we would consider good practice. In addition, the costings do not consider the additional time, cost, and resource that may be required to produce written summaries in accessible formats (e.g. in languages other than English, or in forms such as Braille), as proposed in Paragraph 78 of the consultation.

Question 28. Do you agree with the assumptions we have made to reach these estimates?

No, we do not agree.

Question 29. If not, please can you provide additional information? (Free text)

As noted in our responses to Questions 25 and 27, evidence provided by our members suggests that the assumptions on which these estimates are based do not wholly reflect the possible costs of recruitment, staff training, familiarisation, administration, and out-of-hours work that will be required to meet Awaab's Law. As noted above, we would like to see DLUHC undertake further work in collaboration with the sector to complete a full, updated cost assessment on the likely costs of these proposals, or any amended proposals brought forward.

About CIH

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple – to provide housing professionals and their organisations with the advice, support and knowledge they need. CIH is a registered

charity and not-for-profit organisation so the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in the public and private sectors, in 20 countries on five continents across the world. Further information is available at: www.cih.org.

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