Safer Homes Policy V1

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Equality Impact Assessment required	Yes
Data Protection compliant	Yes
Health and Safety compliant	Yes

Contents

1. What this policy is about and why we need it

1.1 This policy sets out our approach to preventing, identifying and resolving prescribed housing hazards in accordance with Phase 2 of Awaab's Law which comes into effect on 30 November 2026.

1.2 The prescribed housing hazards currently apply to:

- Damp and mould;
- Excess cold;
- Excess heat;
- Falls (including falls on the level, falls on stairs and falls between levels);
- Structural collapse;
- Fire and explosions;
- Electrical safety;
- Domestic hygiene (including personal hygiene and food safety).

1.3 Operational procedures and risk matrices provide the detailed steps for each hazard.

1.4 We need this policy to ensure that we:

- Do everything we reasonably can to make sure our customers stay safe, healthy, and well in their homes. The prescribed housing hazards are issues which can have a serious impact on the health and well-being of our customers, and cause damage to our homes.
- To demonstrate the importance and organisational priority that we place on the ability of our customers to live in safe homes, to our customers, staff, and stakeholders

2. Who does this policy apply to?

2.1 This policy applies to all of our customers who report a prescribed housing hazard in a property owned or managed by us. For leaseholders and shared owners, we will act in accordance with the relevant lease or contractual responsibilities.

2.2 This policy also applies to employees, contractors, consultants and other partners involved in receiving reports, assessing risk, communicating with customers, delivering works, keeping records or providing assurance.

3. Our policy

3.1 The objectives of this policy are to:

- Provide dry, warm, healthy, and safe homes for our customers which are free from all housing health and safety hazards.
- Comply with all relevant legislative, regulatory and contractual obligations, including those arising from tenancies, leases and shared ownership agreements.
- Ensure the fabric of our homes is protected from deterioration and damage resulting from damp and mould and other housing health and safety hazards by following the preventative and remedial actions outlined in this Policy.
- Develop a proactive and positive culture regarding the treatment of issues raised by customers reporting housing health and safety issues.
- Adopt a hierarchical, risk-based approach when diagnosing and resolving housing health and safety issues, with a clear priority given to those customers with underlying health issues and vulnerabilities.
- Support customers in resolving housing health and safety issues where they result from or are exacerbated by using the property, and provide our customers with appropriate, clear, sensitive, practical, and accessible advice.
- Ensure colleagues and contractors are trained to enable them to spot potential causes of housing health and safety hazards so they can advise or signpost customers, diagnose problems, and provide solutions.
- When applying this policy, make reasonable adjustments for people who have a disability and consider the provisions of the Equality Act 2010.

3.2 Scope and response

<u>Preventative action</u>

- We will utilise the Stock Condition Survey programme alongside other internal property and customer interventions including the heating servicing programme, EPC and Asbestos surveys to identify any high and medium risk issues, as specified in the Housing Health and Safety Rating System (HHSRS). These will be actioned immediately on identification.
- We will use a standard risk matrix and analyse stock condition, repairs and customer data to identify homes and property types at increased risk of damp and mould and to plan preventive action.
- We will manage any increased housing health and safety risk arising from work to decarbonise our homes by using effective property specifications and monitoring outcomes.
- When a property becomes vacant, and prior to re-letting, we will seek to identify and remedy any issues which may cause any housing health and safety hazard utilising the Acis Lettable Standard or Acis Student specification to manage all work.
- Where the gas supply at any property has been capped, we will undertake at least an annual internal inspection to address the potential housing health and safety implications on the structure of the property.
- Teams making home visits for any purpose must look for signs of damp and mould and any other housing health and safety hazard, and report concerns immediately through the approved case-reporting route.

- Properties classed as hard to heat or hard to treat will be maintained on an operational risk register and will receive planned inspections based on their construction and risk profile.
- We will contact potentially vulnerable customers pro-actively to manage housing health and safety risks. Where a housing health and safety issue is raised as part of a wider concern, we will utilise our safeguarding procedures to support the customer as required. A portfolio of information will continue to be provided via our newsletters and on our website to raise awareness about the causes of damp and mould.

Dealing with hazards

- We will utilise a structured, staged, embedded approach to advising customers who report any relevant housing health and safety hazard in their homes to conform with the requirements of the 'Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025' also known as Awaab's Law.
- To meet the requirements of Awaab's Law, we will:

Stage	Required action	Deadline
Emergency investigation and safety work	Investigate and, if confirmed, complete relevant safety work.	Within 24 hours of us becoming aware of the hazard
Significant-hazard investigation	Complete the investigation.	Within 10 working days
Written findings	Provide the named customer with a written summary.	Within 3 working days of completing the investigation
Relevant safety work	Complete work needed to remove or reduce immediate risk.	Within 5 working days of completing the investigation
Further works	Begin, or take practical steps to begin, further required works.	Within 5 working days; if that is not possible, as soon as reasonably practicable and with physical work started within 12 weeks
Completion and communication	Complete works within a reasonable period, keep the customer updated and provide safety advice.	Throughout the case
Alternative accommodation	Secure suitable accommodation at our expense if relevant safety work cannot be completed in time.	Before continued occupation becomes unsafe

Operational stages

1. **Report and triage:** record the report on the day it is received, identify vulnerability and decide whether the case may involve an emergency or significant hazard.

2. **Inspection:** arrange a competent inspection within the applicable timescale and review photographs and repair history.

3. **Findings:** record the diagnosis, risk decision, required safety work and longer-term remedy, then issue the written summary.

4. **Works:** complete immediate safety measures and begin permanent works within the required timescales.

5. **Communication:** provide appointment details, progress updates, safety advice and a named contact where appropriate.

6. **Closure:** close the case only when the criteria in section 3.6 are met.

Supporting our customers

- We will give customers advice and support on how to address any relevant housing health and safety hazards
- Where we are aware that fuel poverty is contributing to housing health and safety risks, we will work with customers to identify appropriate support and help them access benefits or income to which they may be entitled.

3.3 Wider housing hazards and phased implementation

- During the lifetime of this policy, the requirements of Awaab's Law will extend beyond the currently prescribed hazards, and in 2027 Phase 3 is expected to cover all remaining HHSRS hazards apart from overcrowding.
- We will adapt this policy, together with its risk matrices, systems, contractor arrangements and customer communications before any further subsequent implementation phase.

3.4 Vulnerability, safeguarding and alternative accommodation

- At first contact and throughout the case, we will identify circumstances that may increase the risk of harm, including young children, older people, pregnancy, disability, respiratory or cardiovascular conditions, weakened immunity and other relevant health or support needs.
- Vulnerability will inform triage, prioritisation, communication methods, welfare checks, reasonable adjustments and the urgency of intervention. Where appropriate, we will liaise with support agencies in accordance with safeguarding and data protection requirements.
- Where a home cannot be made safe within the required timeframe, or continued occupation presents an unacceptable risk, we will secure suitable alternative accommodation at its expense and keep the customer informed about the arrangements.

3.5 Repeat hazard cases

- A repeat hazard case is the recurrence of the same or a similar hazard within 12 months of closure, multiple reports linked to the same location or building defect, or a third similar report within 24 months.

- The first recurrence will require Surveyor review; the second recurrence will require Senior Surveyor or Manager review; and the third recurrence will require Manager or Head of Service review and a documented root cause investigation. Any repeat case involving a vulnerable customer will be escalated immediately to a senior manager.
- Root cause analysis will review previous repairs, building defects, structure, design, ventilation, insulation, drainage, roofing, water ingress, contractor workmanship and relevant household circumstances. Mould treatment will not be used repeatedly as a standalone response where the underlying cause remains unresolved.
- Customers in repeat cases will have a named case owner, regular progress updates, written findings and details of the proposed permanent solution and complaint routes.
- A Repeat Hazard Register will record the property, hazard, earlier reports, vulnerabilities, root cause, actions and completion dates. It will be reviewed monthly by the Property Leadership Team and used to inform planned maintenance and asset investment decisions.

3.6 Record keeping and case closure

- We will retain an auditable record of the initial report, triage, vulnerability assessment, inspections, risk decisions, photographs, correspondence, appointments, works orders, contractor evidence, completion checks, complaints and any alternative accommodation. A case will only close when the hazard and its underlying cause have been addressed so far as reasonably practicable, the customer has been informed, completion evidence has been recorded, and any necessary follow-up monitoring has been arranged.
- Records will be retained in accordance with the corporate retention schedule and, where relevant, for at least six years.

3.7 Staff and contractor training

- Mandatory training, supported by refresher learning and role-specific competency checks, will be provided to our Customer Services team, Housing and Estate teams, Repairs staff, Surveyors, Managers, Student Operations teams and relevant contractors.
- Training will cover hazard identification including damp and mould diagnosis, statutory timescales, use of the risk matrix, vulnerability and safeguarding, reasonable adjustments, customer communication, record keeping, repeat cases, escalation and lessons learned.
- Attendance and competency evidence will be recorded, and contractors must ensure that customer-facing personnel complete appropriate internal or recognised external training.

3.8 Non-compliance and escalation

Trigger	Escalation	Required response

Case at risk of missing a target	Asset Investment Manager or relevant operational manager	Immediate recovery plan, named owner and revised actions
Missed statutory deadline, missing written findings, failure to make safe or repeated contractor failure	Head of Property Development & Assets, Head of Repairs, Head of Customer Operations, or Director of Property Services	Same-day notification, customer protection measures and breach review
Significant, systemic or potentially regulatory breach	Chief Executive and Operations Committee; Board where material	Formal corrective-action plan, assurance reporting and consideration of regulatory notification

- In every case, we will first protect the customer through interim safety measures, welfare support or suitable alternative accommodation. The customer will receive a clear explanation, revised plan and information about complaint routes. Every breach will be reviewed for root cause, contractor accountability, training needs, wider stock implications and preventive action. Actions will be tracked to completion through monthly operational and quarterly governance reporting.

3.9 Responsibilities

The table below identifies key responsibilities:

Position	Role/ Responsibility
Chief Executive	• Policy owner
Director of Property Services	• Implement this policy • Make available adequate resources to enable delivery of this policy
Head of Property Development & Assets, Head of Repairs, Head of Customer Operations	• Achieve overall objectives and targets
Asset Investment Manager, Repairs & maintenance Manager, Planning Manager, Neighbourhood Managers, Operations Manager – Acis Students	• Implement, monitor, manage and report on operational performance • Report performance to the appropriate committee
Asset Surveyors/Quantity Surveyor/Site Services Manager	• Ensure all operational targets are met • Ensure required inspections are completed • Undertake and complete any corrective actions within the defined timescales
Repairs & Maintenance, NBDs, Customer Service Centre and Acis Student teams	• Effectively triage initial customer contacts to ensure action and reporting deadlines are met. • Support the implementation and delivery of this policy by assisting those involved
Finance	• Manage a programme of internal and external audits which will check that the policy and procedure is being followed
Joint Leadership Team	• Where appropriate, ensure members of their directorate undertake any identified roles and responsibilities • Support the implementation and delivery of this policy
Contractors	• Ensure all contractual targets are met

	• Ensure required inspections are completed and recorded • Undertake and complete any corrective actions within the defined timescales • Assist in signposting customers to relevant referral options • Undertake appropriate training for all customer-facing staff
Customers	• It is the responsibility of tenants to provide reasonable access for inspections and remedial works relating to relevant housing hazards. Failure to provide access may prevent the organisation from meeting prescribed response times under Awaab's Law. In such cases, detailed records of access attempts will be maintained, and all reasonable steps will be taken to fulfil legal obligations and protect customer health and safety.

4. How we will monitor this policy

4.1 This policy will be reviewed externally every three years for accuracy and appropriateness, or sooner where legislative or regulatory change requires it.

4.2 Operational performance will be monitored monthly by the Asset Investment Manager. The Head of Property Development & Assets will review detailed compliance and repeat-hazard information monthly.

4.3 Material breaches, systemic trends, investment implications and corrective actions will be reported quarterly to the Tenant Experience Committee in respect of our social housing properties and to the Enterprise Committee in respect of our student accommodation and properties used by Acis Communities and its subsidiaries.

4.4 Measures will include:

- number of emergency cases and percentage investigated and made safe within 24 hours;
- number of significant-hazard cases and percentage investigated within 10 working days;
- number and percentage of written summaries issued within 3 working days;
- number and percentage of safety works completed within required timescales;
- number of other cases and percentage responded to within the relevant internal target;
- repeat hazard cases and trends by scheme, area, contractor and property type;
- overdue cases, statutory breaches, cases involving vulnerable customers and cases requiring alternative accommodation; and
- complaints, Housing Ombudsman findings, customer satisfaction and lessons learned.

4.5 Feedback and suggested improvements from customers who have used the services covered by this policy will be collated and considered during monitoring and review.

5. Equality & Diversity

- We are committed as an employer and provider of housing services to equality of opportunity for all. In addition to this statutory duty under the Equality Act 2010, we are further committed to developing a culture, which recognises wider social diversity in its communities and therefore respects and recognises the values and needs of individuals regardless of whether they belong to a particular section of society or group provided for by legislation.
- We will work with minority and vulnerable groups, support groups, customer forums, and external agencies to ensure they contribute to policy and service development.
- All customers will have access to this document upon request.
- This document can be translated or provided in alternative formats (e.g. large print, Braille, audio) upon request.
- Equality and Diversity awareness training is mandatory for all of our staff.
- Contractors delivering the service will be expected to follow our Equality and Diversity Policy.

6. Data Protection

- All parties referred to in this policy must abide by the 6 principles of the General Data Protection Regulations as detailed below:
    - Lawfulness, fairness and transparency
    - Purpose limitations
    - Data minimisation
    - Accuracy
    - Storage limitations
    - Integrity and confidentiality

7. Procedures and other documents that link to this policy

- The following procedures link to this policy
    - Awaab’s Law Hazards Process Map
    - Risk Matrices and Triage Questions
    - Capital Works process map
    - Capital works procedure

8. Links to other policies, legislation and regulations

- Other policies that link into this policy are:
    - Asset Management Strategy
    - Repairs Policy
    - Health & Safety Policy
    - Equality & Diversity Policy

- Lettable Standard
- Void Policy
- Decant Policy
- Safeguarding Policy
- Hoarding Policy

9. Legislation

- In developing this policy, information, guidance, and references have been taken from the following:
    - Housing Act 2004
    - Health & Safety at Work Act 1974 (HSWA)
    - The Regulator's Consumers Standards
    - Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025, also known as Awaab's Law
    - Housing Health & Safety Rating System (England) (Amendment) Regulations 2026
    - Social Housing (Regulation) Act 2023
    - Defective Premises Act 1972
    - Environmental Protection Act 1990
    - Landlord and Tenant Act 1985 (Section 11)
    - Decent Homes Standard 2006
    - Equality Act 2010
    - Homes (Fitness for Human Habitation) Act 2018
    - Pre-Action Protocol for Housing Conditions Claims (England), 2021

10. When this policy will be reviewed

- This policy will be reviewed every 3 years or in the event of a change in regulations.

11. Jargon buster

Reference	Definition
Decent Homes	The Decent Homes Standard is a technical standard for public housing introduced by the United Kingdom government. The criteria for the standard are as follows: • it must meet the current statutory minimum standard for housing • it must be in a reasonable state of repair • it must have reasonably modern facilities and services • it must provide a reasonable degree of thermal comfort. The standard was updated in 2006 to take account of the Housing Act 2004, including the implementation of the Housing Health and Safety Rating System (HHSRS).
Emergency hazard	A hazard that presents an imminent and significant risk of harm and requires investigation and, where confirmed, relevant safety work within 24 hours.
Significant hazard	An issue that creates a meaningful risk of harm to a tenant's health or safety, but does not pose an immediate, life-threatening danger requiring a 24-hour emergency response
Safety work	Work or an interim measure needed to remove or reduce an immediate risk while a permanent remedy is planned or completed.

Working day	A day on which our relevant services are ordinarily open, excluding weekends and public holidays.
Repeat hazard	The same or a similar hazard recurring within 12 months of closure, multiple reports linked to the same defect, or a third similar report within 24 months.