Ministry of Housing, Communities & Local Government

verian

# Awaab's Law: Test & Learn Research Report

## Executive Summary

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# Foreword

This report summarises findings from qualitative research delivered by Verian and commissioned by the Ministry of Housing, Communities and Local Government (MHCLG) to understand the implementation of Phase 1 of Awaab’s Law, which came into force on 27 October 2025.

The introduction of Awaab’s Law responded to longstanding concerns about the condition of some social housing and the ability to hold landlords to account. These concerns were highlighted by the Grenfell Tower fire (2017) and the death of two-year-old Awaab Ishak (December 2020) following prolonged exposure to damp and mould in his social home.

The objective of Awaab’s Law is to ensure that social housing landlords respond promptly and transparently to serious hazards and are held accountable. The findings from this report will inform the delivery of subsequent phases of Awaab’s Law as the scope of regulations is extended to cover additional hazards.

This research drew on interviews and focus groups with social housing tenants and landlords who had experience with Awaab’s Law, accompanied by a review of policy and operational documents. Overall, the evidence suggested that Awaab’s Law is beginning to shift behaviours and expectations across the sector, particularly in relation to prioritisation of serious hazards. The research also identified constraints from capacity pressures and indications of low tenant awareness. The findings provided by this research will inform future policy development and the implementation of phases 2 and 3 of Awaab’s Law.

We are grateful to all those who contributed to this research, especially Verian for their hard work conducting this research and synthesising the evidence for the report. I would also like to acknowledge the support from wider sector organisations and networks who supported engagement activities with their members, including encouraging them to take part in this research.

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**Ministry of Housing, Communities and Local Government**

# Executive summary

This report presents findings from independent qualitative research commissioned by the Ministry of Housing, Communities and Local Government (MHCLG) and delivered by Verian to assess the implementation of Phase 1 of Awaab's Law, which came into force on 27 October 2025. Drawing on qualitative fieldwork with 30 social housing tenants and 35 registered social landlords in England, conducted between December 2025 and March 2026, the research explores how the legislation is operating in practice and the effectiveness of early implementation.

Awaab's Law introduced statutory requirements for social landlords to investigate and repair emergency and significant damp and mould hazards that pose a risk to tenants' health and safety, within defined, legally enforceable timeframes.

The policy objective is to ensure that social landlords respond promptly, transparently and consistently when serious hazards are identified, and to strengthen accountability where landlords fail to act. In doing so, the policy seeks to:

- Provide clarity and certainty on the timescales within which landlords must investigate and address hazards that risk health or safety;
- Improve transparency and communication between landlords and tenants;
- Reduce the risk of serious harm arising from prolonged exposure to hazardous living conditions; and
- Support a sustained improvement in standards and practice across the social housing sector.

This study used qualitative research to explore the delivery and early impacts of Awaab's Law. The research comprised:

- Familiarisation calls with key stakeholders within MHCLG, followed by in depth engagement with social landlords, social housing tenants
- A review of relevant policy and operational documents, alongside analysis of secondary data sources (e.g. Housemark and MHCLG documents);
- 30 interviews with social housing tenants who had reported an emergency hazard or issues with damp and mould since 27 October 2025 (using topic guides in Appendix A); and
- Six focus groups with social landlords in England (using focus group guides in Appendix B).

This study adopted a purposive sampling approach for both tenants and social landlords, whereby participants were intentionally selected to ensure the study included those with the most relevant experiences and perspectives, focusing on:

- Tenants who reported qualifying hazards (using sample frame in Appendix C); and
- Social landlords involved in delivering Awaab's Law (using sample frame in Appendix D).

Overall, the evidence suggests that Awaab's Law is beginning to shift behaviours and expectations across the sector, particularly in relation to the prioritisation of serious hazards, senior oversight and organisational accountability. However, these early benefits are uneven and fragile, constrained by capacity pressures, ambiguity in guidance and limited tenant awareness of Awaab's Law in general.

## Headline findings – social tenants

### Landlord responsiveness remains variable, with inconsistent delivery across the sector

Tenant experiences of landlord responsiveness to reported hazards remain variable, with inconsistent delivery evident across the sector.

While some participants described prompt, well-managed responses and clear follow-through, others reported delays, fragmented case handling and inconsistent communication, even for similar hazards. Emergency hazards such as gas leaks and floods were often addressed quickly, but damp and mould cases frequently extended over weeks or several months, with delays linked to seasonal capacity and slippage between inspection and remedial works. Landlords did not always identify or respond to tenant vulnerability at first contact, pointing to uneven implementation of the law's intended protections. Where vulnerability was recognised, it tended to drive faster, more structured responses.

Tenants did not consistently receive written inspection summaries, reducing transparency and making it harder for tenants to track commitments, escalate concerns or seek redress where follow-through fell short.

### Tenant satisfaction is driven more by clear communication and visible progress than strict compliance with timescales

Compliance with statutory timescales was not always the primary driver of tenant satisfaction. Tenants tended to judge their landlord's performance against previous experience and expectations and were often willing to tolerate some delay where there was visible progress, credible communication and confidence that the issue would be resolved properly. Dissatisfaction was most acute where processes stalled after an initial response, where updates were lacking or where deadlines were met without a durable fix.

The quality of communication emerged as a strong influence on tenant experience. Clear, proactive and well-documented updates helped to build trust and reassurance, even where cases were complex or slow-moving. Conversely, missed appointments, a lack of updates and the absence of a single point of contact were frequently described as major sources of stress and could undermine confidence as much as the hazard itself.

Tenants placed differing levels of importance on receiving a written summary. Many were unaware they should receive one and, therefore, did not view its absence as significant at the time, particularly where they felt the resolution was progressing. Others described a written record as important for clarity and accountability, helping them understand findings and next steps, track what had been agreed and support escalation or redress if follow-through later fell short.

### Awareness and understanding of Awaab's Law is low, limiting tenants' ability to use the law proactively to challenge poor service

Overall awareness of Awaab's Law among tenants was low. Where tenants had heard of it, understanding was often limited and it was typically associated with damp and mould rather than emergency hazards more broadly. Awareness was higher among more engaged tenants, such as those involved in resident scrutiny panels.

Partly due to this low awareness, tenant behaviour and satisfaction were not primarily driven by legal knowledge. Instead, expectations were shaped by previous experiences with landlords, the severity and duration of issues and whether tenants felt listened to and taken seriously during reporting and follow-up. This suggests that improving communication and delivering durable outcomes may have a more immediate impact on tenant confidence than awareness-raising alone.

Nevertheless, many tenants responded positively when they learned about Awaab's Law, viewing it as a useful lever for holding landlords to account. Tenants with unresolved cases often said they wished they had known about the law sooner. However, this optimism was tempered by substantial cynicism about how effective the law would be in practice and concerns that it would be difficult to enforce.

## Headline findings – social landlords

### Awaab's Law is welcomed in principle, but early implementation has been uneven and constrained by practical barriers

Social landlords broadly supported the intent of Awaab's Law and recognised its role in driving faster and more consistent responses to serious hazards. However, early implementation has been uneven across the sector, shaped by differences in organisational capacity, operating context and hazard type.

Experiences of meeting statutory timescales varied accordingly, with emergency hazards generally seen as more straightforward to address than damp and mould cases, which often required more complex diagnosis and coordination. Landlords described a tension between acting quickly to demonstrate compliance and taking the time required for proper diagnosis, coordination and durable remediation.

While many felt existing emergency arrangements aligned relatively well with the 24-hour requirement, damp and mould cases were seen as more difficult to progress from inspection to effective remediation, particularly where works were complex or specialist input was needed. In response, some organisations reported shifting towards more end-to-end case management approaches to improve ownership, coordination and the likelihood of a thorough fix.

Many landlords noted that late finalisation of guidance by MHCLG limited meaningful preparation ahead of commencement particularly for larger organisations requiring extensive system changes, contractor training and cultural shift. Some had delayed investment or system changes until guidance was finalised, citing previous experience of having to reverse costly changes made based on draft guidance. By contrast, a minority of landlords had been preparing for the law months to years in advance, citing limited or no challenges with implementation.

However, most landlords described their new processes as still bedding in. Many were continuing to refine triage, escalation and record keeping arrangements, and to adapt systems and workflows to support compliance. This transition period was seen as contributing to inconsistency in how quickly and effectively cases could be progressed, particularly for damp and mould, as teams balanced new requirements alongside existing capacity and financial pressures.

## High level understanding of Awaab’s Law is strong, but unclear definitions and reliance on professional judgement complicate consistent operationalisation

At a high level, landlords reported that the purpose and core duties of Awaab’s Law were well understood. However, they also described significant challenges in translating the legislation and associated guidance into operational practice, particularly where requirements depended on professional judgement rather than clear, objective benchmarks. Given the complexity and variability of real world cases, some interpretation is unavoidable in practice and applying requirements consistently will inevitably involve a degree of subjectivity. In this context, there is a clear need for well- defined shared benchmarks and thresholds.

Against this backdrop, the distinction between emergency and significant hazards, definitions of harm and vulnerability and when statutory ‘clocks’ start were widely described as subjective or insufficiently defined. Landlords reported that this ambiguity increased the risk of inconsistent interpretation across teams and organisations and made it harder to embed clear triage pathways and compliance tracking processes. Early identification of vulnerability was recognised as critical to prioritisation and risk management, but landlords reported that vulnerability data were often incomplete, inconsistently recorded or difficult to operationalise, particularly where health information was not routinely shared or updated or where staff lacked confidence in how to weight different vulnerabilities. In the absence of clear benchmarks for damp and mould severity, many organisations developed local workarounds (for example, visual mould scales or proxy indicators), contributing to variation in practice across the sector. These uncertainties were described as driving risk-averse behaviours, including over-categorising cases as emergencies to reduce the risk of non-compliance.

## Awaab’s Law has accelerated positive organisational change, but these gains are tempered by capacity constraints and unintended pressures on delivery

Awaab’s Law has acted as a catalyst for organisational change, prompting landlords to strengthen governance and sharpen operational focus on serious hazards. However, it has also exposed and, in some cases, intensified long-standing capacity constraints across the sector, with rising demand and compliance requirements affecting how staff time and budgets are prioritised and allocated.

Landlords reported a range of positive operational changes, including the creation of specialist teams, strengthened triage and escalation processes, increased use of remote diagnostics (such as video) and a shift towards end-to-end case tracking and management rather than a purely task-based repairs model. These changes were seen as improving ownership, oversight and the consistency of follow-through for high-risk cases, supported by more active senior scrutiny. At the same time, workforce shortages (particularly surveyors and specialist trades), rising contractor costs and limitations in IT interoperability constrained the pace and consistency of delivery. Landlords described having to reallocate resources towards immediate compliance activity, in some cases slowing wider service transformation and limiting the headroom available to embed improvements at scale.

A recurring concern was the impact on planned maintenance and longer-term investment in housing stock. Participants reported that funding and capacity were frequently diverted from cyclical programmes and longer-term asset improvement to meet statutory timescales and to manage increased compliance risk. This raises questions about the sustainability of current approaches if resource pressures persist. Difficulties securing access to properties further complicated delivery and created anxiety about being judged non-compliant despite making reasonable attempts to attend. Several landlords reported being concerned about a perceived increase in ‘claims farming’, where tenants were encouraged to deny access for inspections or works and then pursue legal action against the landlord.

### Uncertainty about definitions and delivery expectations means many landlords do not yet feel prepared for wider roll out under Phases 2 and 3

Social landlords' preparedness for the expansion of Awaab's Law to additional hazards under Phases 2 and 3 was mixed and, in many cases, limited at the time of fieldwork.

Most landlords reported that meaningful preparation for future phases was constrained by uncertainty, particularly the lack of detailed, finalised guidance on how additional hazards such as excess cold, overheating, falls and structural risks would be defined and operationalised. Landlords expressed particular concern about the nature of the hazards included in future phases. Hazards such as excess heat and cold were widely viewed as more subjective than those in Phase 1, raising fears about inconsistent interpretation, expectation management and increased dispute risk. There was also concern that the expanded scope could bring a much wider range of responsive repairs into statutory timeframes, further stretching already constrained workforces and systems.

Overall, while Awaab's Law has prompted important early changes in governance, triage and case management, many landlords did not yet feel fully prepared for Phases 2 and 3. There was a strong view that without clearer guidance, realistic lead-in times and recognition of delivery capacity, future phases risk amplifying the operational, financial and workforce pressures already evident in Phase 1.

## Learnings and emerging implications for policy and delivery

From a landlord perspective, Awaab's Law has sharpened organisational focus on the importance of serious hazards and accountability, but quality of implementation depends on how far delivery models, systems and capacity can keep pace with regulatory ambition. From a tenant perspective, the effectiveness of the law depends heavily on delivery quality, particularly communication and quality of outcomes.

The findings point to a gap between the intent of Awaab's Law and the realities of execution. The section below highlights key learnings emerging from early delivery and draws out implications regarding how practice, guidance and oversight could better support consistent and sustainable implementation.

### Clarity and timing of guidance are critical to effective implementation

Late, ambiguous or internally inconsistent guidance has driven compliance anxiety, defensive practice and uneven delivery. This was particularly evident in complex areas such as no-access scenarios - where landlords are unable to obtain access to homes to conduct repair work within the statutory timeframe. More timely, stable and clearly version-controlled guidance, supported by early definitions of digital and data requirements (e.g., case stages, statutory ‘clock’ triggers, required fields/outputs and standard reporting formats including written summary templates), would enable landlords and system providers to prepare effectively.

Clearer definitions and worked examples would reduce variation in interpretation, while recognising that some professional judgement is inevitable. Alongside this, proactive validation of interpretations within and across landlord organisations would ensure consistent, robust approaches to compliance, reduce uncertainty, and support shared understanding of best practice. While clearer expectations on no-access cases, would support greater consistency in compliance.

### Greater co production with the sector could support more workable guidance

Guidance developed without early practitioner input risks misalignment with delivery realities leading to local workarounds and inconsistency. In contrast, earlier and more transparent co-production with landlords and sector bodies has the potential to improve workability across different operating contexts and strengthen confidence in the guidance. Using collaborative approaches to test assumptions and drawing on emerging evidence identified in this research, such as areas of ambiguity (e.g., thresholds and definitions, vulnerability assessment and no-access scenarios) would help ensure future guidance is both practical and consistently applied.

### Case-management has emerged as a best-practice approach for dealing with complex hazards but is resource dependent

The legislation is driving landlords to shift towards case-based approaches that better align with tenant experiences and long-term resolution. These models are, however, dependent on workforce capacity, continuity and supporting systems. Recognising and addressing these resource implications, through funding, training and workforce development, alongside proportionate assurance in early implementation phases (namely Regulator of Social Housing judgements), will be critical to sustaining this shift while maintaining a focus on resident safety and outcomes.

### The quality of triage shapes outcomes from the first point of contact

Robust, structured triage (including early identification of household vulnerability) enables proportionate prioritisation and better tenant experiences. In contrast, poor triage can lead to variable outcomes for vulnerable residents, fragmented responses, repeat reports and short-term solutions. Embedding structured triage at first contact (including routine vulnerability prompts), supported by clear explanations, training and oversight for frontline staff, would improve both efficiency and outcomes, given the significant downstream impact of early decisions.

## Communication quality and written records shape tenant confidence

Clear, timely and respectful communication is central to tenant confidence, with strong engagement mitigating dissatisfaction, even in complex or slower moving cases. Written outputs, such as inspection summaries, play an important role in accountability and clarity. They help tenants understanding findings, next steps and routes to challenge where necessary. Reinforcing expectations around communication, tenant engagement and ensuring consistent, accessible written records would support both trust and effective dispute resolution (if necessary).

## Tenant awareness remains low, creating equity risks

Low awareness of rights and processes risks uneven benefits, particularly disadvantaging more vulnerable or less engaged tenants. Clearer, more consistent tenant-facing communications about Awaab's Law are therefore essential to ensure equitable access to its protections.

## Compliance pressures can undermine sustainable resolution

In the absence of sufficient capacity and clarity, there is a risk that organisations prioritise evidencing compliance over addressing root causes, leading to repeat failures and undermining trust. At the same time, meeting Awaab's Law requirements can divert resources from planned maintenance and longer term stock investment. Ensuring compliance monitoring and assurance approaches focus on effective resolution, alongside practical support to landlords for remediation, retrofit and strategic asset decisions, would help balance short term compliance with long term sustainability and tenant outcomes.

## Preparedness for Phases 2 and 3 is limited by ongoing uncertainty

Landlords reported that preparation for later phases of Awaab's Law is constrained by uncertainty around definitions, thresholds and delivery expectations. Hazards to be introduced in Phases 2 and 3 (e.g., excess heat and cold) were seen as more subjective and harder to operationalise than Phase 1. Earlier clarity, adequate lead-in times and recognition of delivery capacity constraints will enable effective planning of systems, workforce and supply chains, and avoid amplifying pressures already evident in Phase 1.