



# Awaab's Law 6-months in: how housing associations are coping and readiness for Phase 2



# Legislation is never just a fix

**Like all legislation, it is never as simple as looking at what is being asked of organisations, creating a fix and forgetting about it. It requires planning, testing and constant refinement, and the solution is rarely one size fits all. Awaab's Law is no exception.**

Six months in, housing providers are not only dealing with new expectations around damp and mould; they are also rethinking how they triage risk, gain access to homes, evidence action and prepare for a much wider set of hazards coming into scope.

As we approach the next phase of Awaab's Law, FourNet gathered a group of housing providers from across the UK to discuss their experiences since the legislation launched, including the challenges they have faced, the successes they have seen and the concerns they are now working through.



**In this article, we share some of the key themes that came out of the session, including:**

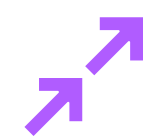
- How Awaab's Law is changing the mindset around damp and mould
- Why no access is becoming one of the biggest compliance risks
- Where technology can support better evidence and faster triage
- Why data and case management are now central to compliance
- What concerns housing providers are raising about the next phases
- What providers should prioritise before the next phase of Awaab's Law





# A quick look at the impact of Awaab's Law

Ahead of the discussion, we asked attendees to share some insights on a handful of questions, which uncovered:



## Very significant impact

Awaab's Law has had a very significant impact on their organisation.



## Teams reprioritised, not grown

Most organisations have reprioritised existing teams rather than significantly increasing headcount.



## 10% to 25%

10% to 25% of tenant interactions are now affected by Awaab's Law.



## Somewhat prepared at launch

Organisations felt somewhat prepared when Awaab's Law went live.



## More than expected

The impact has been more than expected.



## Confident on compliance

Attendees were fairly confident in their organisation's ongoing compliance.



## Positive for tenants

Awaab's Law has had a positive impact on tenant outcomes so far.



## Confident on data and visibility

Attendees were fairly confident they currently have the right data and visibility to manage Awaab's Law.



## Pressure up slightly

Operational pressure has seen a slight increase.



## Reporting most impacted

Reporting and compliance monitoring was identified as the area most impacted in the first six months.



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# How is Awaab's Law changing the mindset around damp and mould?

**For organisations that are doing well when it comes to Awaab's Law compliance, there are clear similarities with organisations responding well to regulations such as the FCA Consumer Duty. They are not treating it as a checkbox task, and they are not assuming that a policy update is enough. They are embedding the change at a cultural level and rethinking their processes around the outcomes expected of them.**

A really interesting example raised in the session was how one housing provider has shifted its mindset around damp and mould reports. Traditionally, damp and mould reports have firstly looked at lifestyle behaviours that might be causing the issue, such as property overcrowding, shower use or poor ventilation habits.

That distinction matters because it moves the organisation away from debating responsibility at the first point of contact and towards asking what needs to happen now to make the home safe. The government guidance also makes clear that everyday activities such as cooking, bathing and drying laundry should not be used as a reason to avoid taking action under Awaab's Law.

Some providers have created designated damp and mould teams, which gives these cases clearer ownership and helps build specialist knowledge quickly. But the wider point from the discussion was that damp and mould cannot sit in a silo, because the tenant journey touches the contact centre, repairs, housing teams, surveyors, compliance, data, technology and contractor management.



## Teams reprioritised, not grown

Most organisations have reprioritised existing teams rather than significantly increasing headcount.

That is why Awaab's Law needs to be treated as a cultural shift, as much as a compliance change. Updating a process is one thing, but getting every team to recognise risk, ask the right questions, capture the right information and escalate at the right point is much harder. If that consistency is missing, the organisation becomes too dependent on individual judgement, and that makes compliance harder to evidence when cases become complex.



## Positive for tenants

Awaab's Law has had a positive impact on tenant outcomes so far.



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# Why is 'no access' becoming one of the biggest compliance risks?

**No access (being unable to gain access to a property to investigate or repair issues) came up repeatedly throughout the session, and it is one of the clearest examples of where legal obligations meet messy operational reality.**



## Pressure up slightly

Operational pressure has seen a slight increase.

If a provider cannot get into a property, it may struggle to investigate the hazard, make the home safe, complete works or prove it has taken reasonable steps. That creates delay for the tenant, wasted cost for the organisation and a compliance risk if the case later comes under scrutiny.

One of the challenges raised was the lack of absolute clarity around what counts as a reasonable attempt to gain access. Some providers are already formalising this through no access policies, where repeated attempts are made at different times and through different channels, rather than relying on a single letter, text or phone call.

The important shift is moving from "we sent a message" to "we can evidence meaningful attempts to engage the tenant". That might include outbound calls, different appointment times, multilingual communications, accessible formats and a clear record of how the tenant responded. This becomes even more important where vulnerability, language barriers or working patterns may affect a tenant's ability to engage.

This is also where no access becomes more than a compliance issue. Every missed appointment has a cost attached to it, especially where surveyors, repairs teams or contractors have been scheduled and the visit cannot go ahead. Reducing no access protects tenants, but it also helps providers reduce avoidable waste in an already stretched repairs environment.

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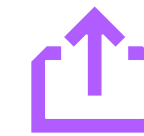
# Where can technology support better evidence and faster triage?

**Technology was discussed most positively where it helps teams solve practical problems, rather than adding another layer of admin. No access is a good example because pre-appointment calls, automated reminders, call records and interaction histories can all help reduce missed visits and create a clearer audit trail.**

This matters because Awaab's Law is not only about whether the repair was completed. It also raises questions about the journey, including when the tenant was contacted, what channels were used, whether they responded, whether another appointment was offered, whether vulnerability was considered and whether the case was escalated when access failed.

These are simple questions, but they can be difficult to answer when information sits across multiple systems. If call notes are in one place, repair records in another, appointment history somewhere else and case ownership in a spreadsheet, the organisation may technically have the information, but still struggle to tell the full story quickly.

Video calling was one of the biggest technology themes in the session. Some providers are already using it to help diagnose issues, assess the seriousness of a case and decide whether an in-person visit is needed urgently.



## 40%

One provider said video is now used on around 40% of their repair calls, with tenants responding positively, and they had rolled it out across all repair types rather than keeping it only for damp and mould or Awaab's Law cases.

That wider rollout is important because it makes video part of the normal repairs journey, rather than a special process that staff and tenants only encounter in high-pressure situations. It can help teams understand what is happening in the property, send the right person first time and reduce avoidable follow-up.

However, the session also made it clear that video is not the answer for everyone. Some tenants may not be comfortable using video due to a number of reasons (digital access, privacy concerns), and others may not be at home when the call takes place. The strongest position is to offer video as a tenant-friendly option that improves triage and speeds up diagnosis where appropriate, not as a replacement for in-person support where a visit is needed.



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# Why are data and case management now central to compliance?

**Awaab's Law is exposing the importance of good data and clear case ownership. Providers need to know where information gaps exist, how datasets connect and whether they can see the full journey from first report to resolution.**

This is already difficult with damp and mould, but it becomes much harder when more hazards come into scope. Attendees raised questions about whether cases should sit in repairs systems, CRM, a dedicated case management system or across more than one platform. One provider said they now put relevant cases through CRM because it gives them better auditability.

That word matters because compliance is not just about the action taken. It is about whether the organisation can show who owned the case, what decision was made, what evidence was captured and what happened next. The Regulator of Social Housing has previously highlighted weaknesses where landlords could not demonstrate a comprehensive understanding of damp and mould across their homes, including gaps in stock data, unclear processes and limited visibility of case volumes.

As with almost all industries these days, housing providers are not short of data, the challenge is whether that data is accurate, connected and visible to the teams that need it at the point they need it.



## Somewhat prepared at launch

Organisations felt somewhat prepared when Awaab's Law went live.

A contact centre agent, repairs planner, surveyor, compliance lead and housing officer may all need to understand the same case, but if each team is looking at a different version of the truth, delays and gaps become more likely.

This is also why triage is becoming one of the most sensitive parts of the process. Teams need to decide whether something is an emergency, whether it presents a significant risk of harm, whether vulnerability changes the level of response, and how the hazard aligns with the repair category. Those decisions need to be fair, consistent and easy to evidence, especially as more tenants become aware of Awaab's Law and use that language when reporting issues.

Clear definitions will become even more important as the next phases arrive. Terms such as urgent, emergency, significant hazard and reasonable access attempt need to mean the same thing across teams, because without that shared understanding it becomes harder to train new people, manage performance and explain why decisions were made.



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# What concerns are housing providers raising about the next phases?

## The next phases are causing concern because they bring more complexity, not just more volume.

Damp and mould has had dedicated focus, clearer ownership and, in some cases, specialist teams. Future phases will bring a wider set of hazards with different risk indicators, different response requirements and different evidence needs, which means the current model may need to stretch much further than it does today.

Attendees questioned how these cases should be managed. Should some hazards remain in repairs while others become formal cases? Will providers need dual management across repairs and CRM? How should cases be handled where a resident may have caused or contributed to the hazard, but the risk still needs to be addressed?

There was also discussion about grouping hazards into broader categories to make them easier to manage. That could help with training, triage and reporting, as long as the categories remain specific enough to reflect the actual risk.



# 7,082 / 30%

The wider pressure is already visible across the sector. In its 2024 to 2025 Annual Complaints Review, the Housing Ombudsman made 7,082 determinations, a 30% increase on the previous year, which shows the level of scrutiny now placed on landlords' ability to resolve issues and evidence their response.

The key point is that the next phase cannot simply be bolted onto current processes. Providers need to test now whether their operating model can handle more hazard types, more judgement calls and more evidence requirements, before those cases start moving through live operations at greater scale.



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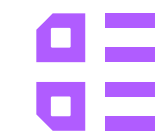
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# What should providers prioritise before the next phase of Awaab's Law?

**The clearest advice from the discussion was not to wait. Some providers are already making changes now so they are ready before the next phase arrives, which feels like the right approach when the next stage will require teams to manage more hazards, more definitions and more case complexity.**

Clearer internal definitions should sit high on the priority list, because teams need shared guidance on urgent and emergency repairs, significant hazards, vulnerability, reasonable access attempts and the evidence required at each stage. This is where there may also be value in sector benchmarking, because many providers are trying to answer the same questions in slightly different ways.

Visibility should be another priority. Providers need to see case progress, access attempts, appointment status, outstanding works, tenant communication and ownership in one joined-up view, or as close to that as possible. Without that visibility, even well-designed processes become difficult to manage in practice.



## Confident on data and visibility

Attendees were fairly confident they currently have the right data and visibility to manage Awaab's Law.

Training and communication between teams also need proper attention, because Awaab's Law cases often move between contact centres, repairs planners, housing officers, surveyors and compliance teams. If handoffs are unclear, delays become more likely and tenants are left repeating themselves, which weakens both the service experience and the evidence trail.

The final priority is to take stock, in order to highlight where the potential risks lie. If providers are aware of potential hazards in any of their homes, they should get ahead of it and make repairs now to ensure hazard calls don't arise in the first place.

The next phase will test how well providers can apply the lessons from damp and mould to a much wider set of hazards. Those best placed to respond will not necessarily be the organisations with the longest policy documents, but the ones that can show, clearly and consistently, how they identify risk, act on it, evidence their decisions and keep tenants safe.