



Awaab's Law Phase 2: From Rules to Reality

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Why Awaab's Law matters to Co-ops

- Named after Awaab Ishak, who died in 2020 after prolonged exposure to mould in his home.
- Introduced by section 42 of the Social Housing (Regulation) Act 2023 and given effect by SI 2025/1042.
- Terms are implied into every social tenancy — they are legally binding, not best practice.
- Enforced by the Regulator of Social Housing, the Housing Ombudsman and local authorities.
- Applies to ALL registered providers in England of every size — small co-ops are not exempt.

No size threshold: a 30-home co-op carries the same duties as a 30,000-home landlord.



The three-phases

Phase 1

27 Oct 2025

All emergency hazards, plus damp and mould posing a significant risk of harm.

Phase 2

30 Nov 2026

Adds seven HHSRS hazard categories, including excess cold, fire and electrical.

Phase 3

Expected 2027

Extends to all remaining HHSRS hazards, except overcrowding.

Each phase widens the hazard scope — the statutory timescales themselves stay the same.

Phase 1: 27 October 2025

What's covered

- All emergency, damp, mould and condensation hazards.
- All damp and mould hazards presenting a significant risk of harm (exc. overcrowding)
- Hazards reported by tenants or identified by the co-op itself.

Statutory time limits

24 hours

Investigate an emergency hazard and make the property safe

10 working days

Investigate a reported significant hazard

3 working days

Issue a written summary of investigation findings, unless works have been completed

5 working days

Begin works to make the property safe

Where safety works cannot resolve the hazard, further preventative works follow within a reasonable period.

Phase 2: 30 November 2026

New guidance issued.

Important changes to the definitions of Emergency and Significant Hazards.

Seven further HHSRS hazard categories come into scope where they present a significant risk of harm.

Excess cold

Excess heat

Falls — level, stairs, baths, between levels

Structural collapse and falling elements

Fire and explosions

Electrical hazards

Domestic and personal hygiene, pests and refuse

What co-ops need to do to comply



1. Record every report

Log all hazard reports from any channel — phone, email, WhatsApp, committee meetings, repairs visits — with a date-stamp that starts the clock.

2. Triage against HHSRS

Assess whether a report is an emergency or a significant hazard, and evidence how that judgement was reached.

3. Meet the timescales

Track 24-hour, 10-day, 3-day and 5-day deadlines with alerts, not memory. Late is a breach.

4. Write to the tenant

Send a written summary of findings within 3 working days, in plain language, and keep a copy.

5. Offer alternative accommodation

Where the hazard cannot be made safe in time, offer suitable alternative accommodation at the co-op's cost.

6. Keep the audit trail

Retain records of reports, inspections, notices, works and tenant contact — the defence to any claim is documentary.

Where co-ops are most exposed



Out-of-hours cover

Volunteer-run co-ops may not have a route for an out of hours emergency report — yet the 24-hour duty still applies for emergency repairs.

Informal reporting

Hazards raised in conversation or at a meeting never enter a system, so the clock runs unrecorded.

Contractor capacity

Small contracts rarely guarantee a 5-working-day repair; Phase 2 volumes will test this hardest.

Record keeping

Without a documented trail, the co-op cannot demonstrate compliance even where it acted promptly.

Each of these is fixable with process, not capital spend.

Practical steps for a small co-operative



Policy

Adopt a written Awaab's Law / hazards policy approved by the committee, covering triage, timescales and escalation.

People

Name a responsible officer and a deputy. Cover holidays and evenings — the 24-hour clock does not pause.

Contractors

Update contracts and call-out arrangements so response times match the statutory deadlines.

Systems

Use a shared log or repairs system that date-stamps reports and flags approaching deadlines.

Training

Brief committee members, contractors and volunteers on spotting and reporting hazards, not just staff.

Tenants

Tell residents how to report hazards and what response they can expect, in writing. Know your tenants – develop your understanding of household vulnerabilities.

Shared services and consortium arrangements can carry much of this load for smaller co-ops.

Next steps and timeline



Now

Confirm Phase 1 processes are live and evidenced: logging, triage, written summaries, deadline tracking.



Now

Gap-analysis against the seven Phase 2 hazards; renegotiate contractor response times.



By 30 Nov 2026

Phase 2 duties in force — staff and committee trained, tenant communications reissued.



Into 2027

Prepare for Phase 3: assume every HHSRS hazard except overcrowding is in scope.

Compliance is a system, not a one-off project — build it once, then widen the hazard list at each phase.

What we've learned



1. Emergencies are not common

Our experience has been a very low number of emergency hazards. If you know & maintain your properties issues should only become emergencies in exceptional circumstances.

2. Get to the root of the issue

By identifying the root cause of an issue (esp. mold) you can prevent it from recurring. Don't be tempted to treat the symptoms but not the cause.

3. Regular repair surveys

Pro-actively undertaking repairs surveys can help to identify problems, prevent emergencies from occurring, and avoid complex claims later.

4. Preventative programmes can help

Regular and preventative measures such as clearing gutters and gullies, servicing fans, drip grooves in bay windows or water proofing external brickwork can prevent issues arising.

5. Consider ADR

Where a report becomes a claim, consider Alternate Dispute Resolution (ADR). The process allow landlords to reach a negotiated resolution with tenants avoiding protracted disputes and high legal costs.

6. Embed AL in your repairs processes

As AL takes more hazards into account it becomes more mainstream, raising the question whether it should simply be embedded in standard repairs policies, rather than alongside them?

Phase 3: the remaining hazards

- Extends the framework to all remaining HHSRS hazards, except overcrowding.
- Government has signalled 2027 for this final extension; the commencement date is confirmed by later regulations.
- Covers areas such as noise, lighting, water supply, sanitation, ergonomics and lead or radiation risks.
- In practice, effectively every serious housing condition issue becomes time-bound.

Build once, scale later: systems designed for Phase 1 should be able to applied to later phases.



More information...

[Member forums WATCH | CCH Confederation of Co-operative Housing](#)

[National Housing Federation - Awaab's Law](#)

[Awaab's Law: Guidance for social landlords - Timeframes for repairs in the social rented sector - GOV.UK](#)

