



HONEYCOMB
GROUP

Awaab's Law Compliance Policy



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Who's this for?	The Honeycomb Group – Staffs Housing; Concrete; Glow
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Document Revision History

Version	Date	Description of Change	Author
V.1	August 26	New Policy – to replace Damp, Mould and Condensation Policy.	Sharon Parkes Health and Safety Manager

1. Introduction and policy objectives

As a landlord, Honeycomb Group is committed to providing safe, healthy, and well-maintained homes. We will comply with Awaab's Law and all relevant housing legislation by responding promptly to reports of damp, mould, and other hazards that may affect the health and safety of residents.

- Honeycomb Group is committed to delivering management of damp and mould and other HHSRS hazards and will ensure that residents' concerns are investigated and resolved within statutory timeframes for social landlords to investigate and remedy hazards in social housing.
- The key objective of this policy is to ensure our Board, Executive Team, employees, partners and customers are clear on our legal and regulatory Awaab's obligations. This policy provides the framework our staff and partners will operate within in order to meet these obligations
- This policy forms part of our wider organisational commitment to driving a healthy and safety culture amongst staff and contractors (as detailed within our Health and Safety Policy). It will be saved on our shared drive and distributed to all relevant members of staff and contractors.
- This policy outlines how Honeycomb Group identifies, investigates, and remedies structural and environmental health hazards. It ensures total compliance with Awaab's Law.

2. Policy Purpose & Scope

This policy outlines how **Honeycomb Group** identifies, investigates, and remedies structural and environmental health hazards. It ensures total compliance with **Awaab's Law**.

This policy applies to

- All employees of Honeycomb Group, regardless of employment status, or contractual condition, including contractors
- The Board of Directors / Trustees
- All tenants and occupants of property owned or leased by Honeycomb Group as detailed in the policy.

Scope

This policy applies to all properties owned, managed, or leased by Honeycomb Group. It dictates the behaviour of all internal staff, customers, and contractors.

This policy aims to:

- Ensure compliance with Awaab's Law and associated regulations.
- Protect residents from health and safety risks
- Establish clear responsibilities and response times.
- Promote effective communication with residents.
- Provide a consistent approach to hazard reporting, investigation, and remediation.

This policy applies to:

- All housing stock owned or managed by the Housing Association.
- All employees, contractors, and agents acting on behalf of Honeycomb Group
- All residents, including tenants and leaseholders where the organisation retains repair responsibilities.

This policy is relevant to all our employees, customers, contractors, stakeholders and other persons who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services.

The policy should be used by all to ensure they understand the obligations placed upon Honeycomb Group to maintain a safe environment for customers and employees within the home of each customer, and within all communal areas of buildings and other properties we own and/or manage. Adherence to this policy is mandatory.

3. Regulatory standards, legislation and codes of practice

This policy is informed by:

- Social Housing (Regulation) Act 2023.
- Awaab's Law (Hazards in Social Housing Regulations).
- Landlord and Tenant Act 1985.
- Homes (Fitness for Human Habitation) Act 2018.
- Health and Safety at Work etc. Act 1974.
- Housing Health and Safety Rating System (HHSRS).
- Decent Homes Standard.

4. Statement of Intent

Honeycomb Group is committed to providing safe, healthy, and well-maintained homes. We will comply with Awaab's Law and all relevant housing legislation by responding promptly to reports of damp, mould, and other HHSRS hazards that may affect the health and safety of residents.

Honeycomb Group operates a zero-tolerance approach to damp, mould and HHSRS hazards. Reports will be treated as a potential health and safety risk until assessment demonstrates otherwise. The organisation will not attribute responsibility to residents without evidence and will focus on identifying and resolving root causes.

Honeycomb Group will ensure that residents' concerns are investigated and resolved within statutory timescales. Awaab's Law introduces mandatory timeframes for social landlords to investigate and remedy hazards in social housing, and these will be adhered to at all times.

5. Core Response Timeframes

Awaab's Law requires housing associations to investigate and fix reported health hazards in social housing within strict legal timeframes. Key deadlines include investigating all emergency hazards within 24 hours and assessing significant hazards within statutory timeframes.

- **Emergency Hazards:** Investigate and make safe within **24 hours** (applies to damp & mould, major leaks, dangerous electrical faults, or broken external doors/windows etc).
- **Significant Damp and Mould / Hazards:** Investigate within **10 working days** of the report.
- **Written Summary:** Provide tenants with a report of the investigation findings within **3 working days** of completion.
- **Start Repairs:** Honeycomb Group will complete remedial works as quickly as reasonably practicable and within any statutory timescales prescribed under Awaab's Law and associated regulations.
- **Alternative Accommodation:** Offer temporary housing if the home cannot be made safe within these strict limits.

6. Policy Principles and Culture

- **No-Blame Approach:** Focuses entirely on building, construction, and maintenance flaws rather than blaming tenant lifestyle or ventilation habits.
- **Vulnerability Tracking:** Prioritises responses based on household health conditions (such as respiratory illnesses or young children) rather than generic severity scores alone.
- **Clear Record Keeping:** Mandates full digital documentation and tracking of every report from initial contact to final sign-off to ensure legal compliance.

7. Covered Hazards

This policy covers hazards classified under the **Housing Health and Safety Rating System (HHSRS)**.

Immediate Scope (Phase 1)

- Any hazard posing an imminent risk to safety
- Significant damp and mould hazards

Phase 2 Expansion (Effective 30 November 2026)

In line with the Awaab's Law Phase 2 Guidance, the strict timeframes will apply to seven broader risk profiles:

- **Thermal Comfort:** Excess cold and excess heat.
- **Physical Safety:** Falls on stairs, levels, or between levels.
- **Structural Safety:** Structural collapse and falling elements.
- **System Failures:** Fire, explosions, and electrical hazards.
- **Sanitation:** Domestic hygiene, pest infestations, and inadequate refuse facilities.

Phase 3 Expansion (Effective 2027, due date to be confirmed)

This brings all remaining HHSRS hazards into the scope of Awaab's Law and this policy

8. Inspection Program - Statutory Compliance Timeframes

Awaab's Law requires social landlords to investigate and address emergency hazards and significant damp and mould hazards within prescribed timescales.

Honeycomb Group legally binds itself to the following operational intervals upon receipt of a hazard report:

Stage	Action Required	Mandatory Deadline
1. Emergency Action	Investigate and execute "make safe" actions for imminent dangers.	Within 24 Hours
2. Significant Hazard Inspection	Inspect the property and diagnose the root cause.	Within 10 Working Days
3. Tenant Written Summary	Provide the resident with a comprehensive assessment report.	Within 3 Working Days of inspection

4. Repair Commencement	Begin physical onsite work to remove or remedy the hazard.	Within 5 Working Days of report delivery
5. Full Project Completion	Conclude all structural, component, or preventative works.	Within 12 Weeks max

Household Vulnerability Triaging - Honeycomb Group will identify whether occupants include:

- Children under five years
- Pregnant persons
- Older persons
- Individuals with respiratory conditions
- Immunocompromised individuals
- Disabled persons
- Individuals receiving care or support services

Where vulnerabilities are identified, response times may be accelerated beyond statutory minimum requirements.

Escalation Cases must be escalated immediately where:

- A statutory deadline is at risk of being missed.
- A Category 1 hazard is identified.
- A resident's health is deteriorating.
- Access cannot be obtained.
- Significant structural defects are identified.
- Temporary accommodation is required.

Reporting and Investigation Process

Residents may report damp, mould or housing hazards through:

- Telephone
- Online portal
- Email
- In person
- Via support workers, advocates, staff and Contractors
- Through complaints procedures

All reports shall:

- Be logged immediately
- Receive a unique case reference
- Be risk assessed
- Include vulnerability screening
- Be tracked until closure

Access Refusals - Where access is denied:

- The 'No Access' Procedure will be followed at all times
- A minimum of three contact attempts will be made.

- Alternative appointments will be offered.
- Vulnerability concerns will be referred to Housing Teams.
- Legal remedies may be considered where health and safety risks remain.

All attempts shall be documented.

Alternative Decant Accommodation

Where a hazard cannot be sufficiently mitigated within statutory timescales or where occupation presents a significant risk to health and safety, Honeycomb Group will consider:

- Temporary accommodation
- Emergency decants
- Permanent decants
- Temporary support measures

Decisions will be risk-based and fully documented.

Where a property cannot be made safe within required timescales, suitable temporary accommodation will be considered and offered where necessary. Awaab's Law includes provisions regarding alternative accommodation when hazards place residents at risk.

9. Performance Monitoring and Compliance

The following KPIs will be monitored:

- Reports received
- Inspections completed within target
- Repairs completed within target
- Cases exceeding statutory timescales
- Repeat occurrences
- Decants required
- Complaints received
- Resident satisfaction

Performance reports will be presented:

- Monthly to Operational Management
- Quarterly to Executive Team
- Regularly to Board as part of compliance assurance reporting

Contractor performance will be monitored against:

- Compliance with statutory response times.
- Quality of completed works.
- Resident satisfaction.
- Health and safety performance.
- Repeat repair rates.

- Timeliness of reports and documentation.

Honeycomb Group reserves the right to undertake audits, inspections, and performance reviews and may take corrective action where performance falls below required standards.

Failure to Comply

Failure to comply with this policy, contractual requirements, health and safety obligations, or Awaab's Law requirements may result in:

- Corrective action plans.
- Increased monitoring.
- Suspension of work orders.
- Contractual penalties where applicable.
- Termination of contract.
- Reporting to relevant regulatory or professional bodies where appropriate.

10. Additional legislations

This policy has been developed in line with Government guidance and associated best working practices.

11. Key Roles and Responsibilities

The Executive Team

The Executive Team reviews reports and/or performance indicators to assure itself that the measures detailed in this policy are met, monitors and reviews compliance, and ensures legal requirements are met. Ensures that resources are made available to allow for the appropriate management of this policy. Is accountable for the implementation of this policy and ensures that all duty holders under the policy is managed to ensure full compliance.

Board Assurance the board will receive periodic assurance reports regarding, compliance performance, statutory timescales, damp and mould trends, high risk cases, complaints, and regulatory compliance, the board retains overall reasonability for ensuring effective governance and oversights of this policy.

The Executive Director of Operations

The Executive Director of Operations has strategic responsibility for compliance with Awaab's Law and the management of damp, mould and housing condition hazards across the organisation. They are responsible for ensuring effective arrangements are in place to achieve and maintain compliance with all statutory and regulatory requirements relating to the condition of residents' homes.

They will oversee the implementation of this policy and ensure that adequate resources, systems and processes are available to deliver the organisation's obligations under Awaab's Law.

The Head of Property

The Head of Property has operational responsibility for the management of damp, mould and housing condition compliance. They will oversee the delivery of inspections, investigations, repairs, remediation works, planned improvements and all associated compliance activities.

The Head of Property will fulfil the role of the appointed Responsible Person on behalf of the Executive Director of Operations.

Responsibilities include:

- Ensuring adequate resources are available to achieve compliance with Awaab's Law.
- Monitoring compliance performance and key performance indicators.
- Reviewing housing condition risks and implementing appropriate control measures.
- Ensuring inspections, investigations and remedial works are completed within prescribed timescales.
- Managing contractor performance and compliance.
- Ensuring actions arising from inspections, complaints, surveys and investigations are completed promptly.
- Reporting significant risks, disrepair issues and non-compliance matters to senior management.
- Ensuring effective governance arrangements are in place for damp, mould and housing condition management.

Assistant Assets & Contract Manager

The Assistant Assets & Contract Manager is responsible for the day-to-day management and delivery of damp, mould and housing condition compliance activities. They will ensure inspections, remedial works, repairs and follow-up actions are completed within required timescales.

Responsibilities include:

- Managing inspection, repair and remediation programmes.
- Monitoring contractor performance and service delivery.
- Ensuring actions arising from inspections, surveys and complaints are completed promptly.
- Reviewing reported damp, mould and housing condition defects and ensuring appropriate corrective action is taken.
- Monitoring outstanding cases and escalating delays or barriers to resolution.
- Escalating compliance concerns, risks, overdue actions and contractor issues to the Head of Property.
- Ensuring residents are kept informed throughout the investigation and repair process.
- Investigating significant incidents, complaints or compliance failures.

The Property Coordinator

The Property Coordinator is responsible for coordinating compliance activities, maintaining accurate records and supporting the scheduling of inspections, surveys and remedial works.

Responsibilities include:

- Maintaining accurate records of inspections, surveys, repairs and remediation works.
- Recording outcomes within the organisation's housing and asset management systems.
- Monitoring compliance timescales and ensuring actions are tracked to completion.
- Arranging appointments and coordinating works with residents and contractors.
- Supporting compliance monitoring and reporting activities.
- Ensuring documentation is readily available for employees, auditors, regulators and other stakeholders as required.

The Property Void Specialist

Where damp, mould or housing condition concerns are identified within void properties, the Property Void Specialist will ensure these issues are appropriately investigated and addressed before a property is re-let.

Responsibilities include:

- Reviewing any known damp, mould or housing condition defects affecting the property.
- Reporting concerns to the Property Team for investigation and action.
- Ensuring remedial works are completed prior to occupation where required.
- Liaising with the Property Team regarding outstanding repairs or compliance matters.
- Liaising with the Neighbourhoods Team regarding vulnerabilities, allocations and rehousing considerations where applicable.
- Ensuring relevant information is communicated during the handover of properties.

Property Surveyors

Property Surveyors are responsible for inspecting properties, identifying hazards, specifying works and managing repair, remediation and improvement projects relating to damp, mould and housing condition compliance.

Responsibilities include:

- Undertaking inspections and investigations into reports of damp, mould and housing condition defects.
- Identifying the root causes of issues and specifying appropriate remedial actions.
- Ensuring specialist surveys and investigations are commissioned where required.
- Instructing contractors in accordance with organisational procurement and contract management procedures.
- Ensuring work specifications clearly identify compliance requirements and expected outcomes.
- Monitoring the progress and quality of works.
- Verifying that remedial actions have been satisfactorily completed.
- Escalating significant concerns, risks or non-compliance issues to the Head of Property, Assistant Assets & Contract Manager, and Health & Safety Manager.

This provides clear ownership for:

- Property inspections and condition assessments.
- Damp, mould and hazard investigations.
- Specifying and managing remedial works.
- Commissioning specialist surveys where required.
- Monitoring compliance and escalating concerns.

The Health and Safety Manager

The Health and Safety Manager will provide professional advice, guidance and assurance regarding Awaab's Law compliance, housing health and safety risks and damp and mould management arrangements.

Responsibilities include:

- Providing competent advice on relevant legislation, regulation and best practice.
- Supporting the review and continuous improvement of damp and mould management arrangements.

- Monitoring organisational compliance and performance.
- Undertaking audits and compliance reviews.
- Reporting significant risks, trends and non-compliance matters to senior management.
- Promoting a positive culture of compliance, customer safety and accountability throughout the organisation.

Housing Teams / Neighbourhood Officers / TSO's / DA Practitioners

Housing Teams, Neighbourhood Officers, TSO's and DA Practitioners will support compliance with Awaab's Law by assisting communication with residents, identifying concerns and ensuring that vulnerabilities are appropriately considered.

Responsibilities include:

- Supporting effective communication with residents regarding damp, mould and housing condition matters.
- Reporting concerns identified during visits, tenancy management activities or customer contact.
- Identifying vulnerable residents who may be disproportionately affected by housing condition issues.
- Working collaboratively with the Property Team to facilitate access and resolution of cases.
- Supporting temporary accommodation, decant or rehousing arrangements where required.
- Working with Occupational Therapists and support services to ensure residents' individual needs are considered.
- Assisting with resident engagement and education relating to condensation, damp and mould where appropriate.

Contractors

All contractors undertaking inspections, surveys, repairs, remediation, specialist investigations and improvement work on behalf of the organisation must be suitably competent, appropriately qualified and experienced.

Honeycomb Group recognises that contractors play a critical role in ensuring compliance with Awaab's Law and in protecting residents from hazards that may impact their health, safety, and wellbeing.

All contractors, subcontractors, consultants, and specialist service providers engaged by the Housing Association must comply with this policy, contractual requirements, and all applicable legislation and regulatory standards.

Contractors are responsible for:

- Undertaking works in accordance with relevant legislation, regulations, industry guidance and organisational procedures.
- Operate a safety system of work, undertake suitable risk assessment and method statements.
- Completing inspections, investigations and remedial works within agreed timescales.
- Providing accurate reports, evidence and completion records, inspection dates, times, findings and recommendations, works completed, materials used, photographic evidence before and after works, resident communication, and follow up actions required.
- Immediately reporting serious hazards, unsafe conditions or concerns that may affect residents' health and safety. Maintain adequate insurance cover and provide evidence upon request.
- Maintaining appropriate records of works undertaken.
- Cooperating with monitoring, auditing and performance management arrangements.

- Ensuring works are completed to the required quality standard and that root causes are appropriately addressed, records to be provided to Honeycomb Group within agreed reporting timescales.
- Contractors must immediately escalate any identified Category 1 HHSRS hazard or emergency risk to Honeycomb Group, regardless of the original scope of works

Policy Statement for Contractors

All contractors acting on behalf of Honeycomb Group are expected to contribute proactively to the prevention, identification, reporting, and resolution of damp, mould, and other housing hazards. Compliance with Awaab's Law is a contractual requirement, and contractors must support Honeycomb Group in achieving full regulatory compliance and protecting residents from harm.

All Employees

All employees have a responsibility to support compliance with Awaab's Law and the effective management of damp, mould and housing condition hazards and must:

- Report any damp, mould, disrepair or housing condition concerns immediately.
- Follow relevant policies, procedures and guidance.
- Cooperate with inspections, investigations and compliance activities.
- Support residents in reporting concerns and accessing services.
- Escalate any concerns regarding non-compliance, delays or safety risks through appropriate management channels.
- Treat reports of damp, mould and housing condition issues seriously and respond in a customer-focused manner.
- Contribute to a culture of early intervention, prevention and continuous improvement.

Residents

Residents are encouraged to:

- Report damp, mould and defects promptly.
- Provide access for inspections and repairs.
- Inform Honeycomb of household vulnerabilities.
- Report deterioration of conditions.
- Cooperate with agreed appointments.

Honeycomb Group will not presume resident behaviour is the cause of damp or mould. Investigations will focus on identifying and resolving the root cause through evidence-based assessment of the property, environment and relevant contributing factors.

12. Honeycomb Group shall maintain accurate records relating to:

- Reports of damp, mould and housing hazards.
- Vulnerability assessments.
- Inspection reports.
- Risk assessments.
- Photographic evidence.
- Survey reports.
- Resident communications.

- Repair orders and completion records.
- Temporary accommodation and decant arrangements.
- Escalations, complaints and compensation claims.

Records shall be retained in accordance with the organisation's Records Management Policy and Data Retention Schedule.

13. Resident Communication

Honeycomb Group will:

- Acknowledge all reports promptly.
- Keep residents informed throughout investigations and repairs.
- Provide inspection outcomes in writing.
- Explain decisions relating to repairs or alternative accommodation.
- Provide information in accessible formats where required.
- Encourage residents to report recurring or worsening conditions.

Resident Engagement

- Treat residents with dignity, respect, and professionalism at all times.
- Clearly explain the nature of inspections and proposed works.
- Consider the needs of vulnerable residents and make reasonable adjustments where required.
- Protect residents' homes and possessions while carrying out works.

14. Complaints

Where a resident is dissatisfied with the handling of a damp, mould or housing hazard case, they may raise a complaint through the organisation's Complaints Policy.

Complaints relating to Awaab's Law cases will be monitored to identify trends, service failures and opportunities for improvement.

15. Competent persons

Honeycomb Group will ensure that all persons undertaking inspections, surveys, investigations, risk assessments and remediation activities are competent through a combination of:

- Appropriate qualifications.
- Professional knowledge.
- Relevant experience.
- Training.
- Ongoing supervision.

Specialist investigations shall be undertaken by suitably qualified and competent surveyors or contractors where necessary.

16. Training

Relevant staff will receive training covering:

- Awaab's Law requirements
- Damp and mould identification
- Vulnerability assessment
- Resident engagement
- HHSRS awareness
- Record keeping obligations

17. Equality, Diversity and Vulnerability

Honeycomb Group recognises that housing hazards may disproportionately affect vulnerable residents.

The organisation will ensure:

- Fair and equitable access to services.
- Reasonable adjustments where required.
- Accessible communications.
- Translation and interpretation services where necessary.
- Consideration of protected characteristics under the Equality Act 2010.

18. Quality Assurance

Data Protection

For processing, storing and sharing the personal data associated with this Policy, we will ensure that it is carried out in accordance with current data protection legislation (UK GDPR and Data Protection Act 2018).

Linked policies and procedures

- Health and Safety Policy
- Awaab's Law process flow chart
- No Access procedure

Review

This policy shall be reviewed every two years, and a review may be required sooner:

- Legislative changes.
- Regulatory updates.
- Learning from complaints or serious incidents.
- Changes to Awaab's Law implementation phases, or significant change.

Learning from Incidents

Honeycomb Group will review:

- Complaints.
- Ombudsman determinations.
- Regulatory findings.
- Serious incidents.

- Near misses.
- Cases that exceed statutory timeframes.

Lessons learned will be communicated across the organisation and incorporated into policies, procedures and training programmes.

19. Definitions

Awaab's Law

Legislation introduced through the Social Housing (Regulation) Act requiring social landlords to investigate and rectify prescribed housing hazards within statutory timescales.

Damp

The presence of excessive moisture within a building which may arise from penetration, rising damp, leaks, condensation, or construction defects.

Mould

Fungal growth resulting from excessive moisture which may negatively affect the health of occupants.

Hazard

Any deficiency or defect presenting a risk to health or safety as defined by the Housing Health and Safety Rating System (HHSRS).

Emergency Hazard

A defect presenting an imminent and significant risk to the health or safety of occupant

