



# NORTH STAR

Creating homes, building futures

## Awaab's Law Policy 2025

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| Title of Policy | Awaab's Law Policy              |
| Version         | V1                              |
| Created         | 27 <sup>th</sup> October 2025   |
| Next Review     | 1 <sup>st</sup> October 2026    |
| By              | Head of Property and Compliance |

## Statement of Intent

North Star is committed to safeguarding residents from serious health hazards in accordance with Awaab's Law, introduced via the Hazards in Social Housing (England) Regulations 2025. The death of Awaab Ishak was a watershed moment for the sector and requires a decisive, system-wide response.

From October 2025, Awaab's Law places statutory duties on landlords to investigate and resolve damp and mould hazards within strict timescales. These requirements may be extended in stages to cover all Category 1 hazards under the Housing Health and Safety Rating System (HHSRS), but the phased implementation will be dictated by the Government.

North Star will meet and exceed these duties, ensuring that no resident is left living in conditions that could harm their health.

In delivering this commitment, North Star will:

1. Operate robust hazard identification, triage and risk assessment aligned to HHSRS, with immediate focus on damp and mould and full readiness for staged expansion.
2. Investigate and remedy hazards within Awaab's Law timescales (24 hours / 5 working days / 10 working days), applying proportionate interim controls where full repairs cannot be completed immediately.
3. Implement timely, evidence-based remedial actions; escalate high-risk cases immediately; and provide safe alternatives or temporary measures where required.
4. Maintain accurate, auditable records for at least five years; monitor contractor performance against KPIs; and report compliance, exceptions and risks to SMT monthly and the Board quarterly.
5. Communicate findings, actions and timescales clearly in writing; support vulnerable residents; and provide follow-up confirmation on completion.
6. Ensure only trained, competent staff and contractors undertake assessments and remedial works; provide refresher training after incidents, audits or regulatory changes.
7. Review this policy and its procedures following incidents, audits or legislative changes, embedding lessons learned into practice.

This policy forms part of North Star's wider compliance framework and provides assurance to the Board, residents and regulators that hazards are managed promptly, transparently, lawfully, and in line with the staged implementation of Awaab's Law.

## Approval and Sign-Off

Approved by: Emma Speight – The Responsible Person for Health & Safety

Role: Executive Director of Assets & Growth

Signed:



Date 27.10.25

## Introduction

As a responsible landlord, North Star is committed to ensuring that every home we own or manage is safe, healthy, and fit for human habitation.

Awaab's Law introduces new statutory duties for social housing landlords to investigate and remedy serious hazards within strict timescales.

From October 2025, these duties will apply specifically to damp and mould hazards, before being extended in stages to cover all Category 1 hazards under the Housing Health and Safety Rating System (HHSRS), with phase 2 and 3 timescales, still to be outlined by the Government.

These new requirements build upon existing obligations under the Housing Act 2004, the Homes (Fitness for Human Habitation) Act 2018, and the Decent Homes Standard, reinforcing our duty to ensure safe, compliant homes for all residents.

This policy provides the framework for managing hazards in line with:

- [Hazards in Social Housing \(England\) Regulations 2025 \(Awaab's Law\)](#)
- [Housing Act 2004 - Housing Health and Safety Rating System \(HHSRS\)](#)
- [Homes \(Fitness for Human Habitation\) Act 2018](#)
- [Social Housing \(Regulation\) Act 2023](#)
- [Building Safety Act 2022 \(where relevant hazards overlap\)](#)
- Relevant British Standards and statutory guidance

## Scope

This policy applies to all North Star employees, contractors, customers, partners, and stakeholders involved in identifying, managing, or resolving hazards within our housing stock. It defines how we will discharge our duties under Awaab's Law and ensures a consistent approach across all services.

## Properties Covered

This policy applies to all residential dwellings owned or managed by North Star, including general needs housing, supported housing, and temporary accommodation. It also extends to communal areas in blocks, schemes, and estates where North Star holds landlord or maintenance responsibility.

In addition, the policy covers all associated landlord responsibilities for building structures, internal environments, and systems that could give rise to Category 1 hazards under the Housing Health and Safety Rating System.

## Hazards Covered

From October 2025, this policy applies in full to damp and mould hazards, as required by the first stage of Awaab's Law.

From 2026 (pending Government decision) onwards, it is expected that duties will be extended to all Category 1 hazards under the Housing Health and Safety Rating System (HHSRS), which may include but are not limited to:

- Excess cold and excess heat
- Fire safety risks
- Electrical safety risks
- Carbon monoxide and fuel combustion products
- Asbestos and lead
- Structural collapse and falling elements
- Domestic hygiene, pests, and refuse
- Falls, collisions, and entrapment

North Star will implement systems, processes, and training so that the staged implementation of Awaab's Law can be met seamlessly and without delay.

## Exclusions

Hazards in homes where North Star does not hold landlord repairing responsibility, such as properties where leaseholders are responsible for repairs, are excluded from the scope of this policy. In such cases, North Star will provide signposting to appropriate advice and will liaise with the responsible parties where risks are identified.

Similarly, where hazards fall under the responsibility of a third party, such as managing agents, North Star will not assume direct responsibility but will seek assurance that statutory duties are being met. Where concerns arise, these will be escalated to the relevant authority to ensure residents are not placed at risk.

## Mandatory Compliance

Compliance with this policy is mandatory. All staff, contractors, and service providers must understand and follow the requirements of Awaab's Law and this supporting framework.

## Ownership and Responsibility

North Star recognises that clear roles and responsibilities are essential to the effective and compliant delivery of Awaab's Law. Ultimate accountability rests with the Chief Executive, but responsibility for day-to-day delivery is delegated through the organisation to ensure hazards are identified, assessed, and resolved within statutory timescales.

## Chief Executive

The Chief Executive holds ultimate accountability for compliance with Awaab's Law and for ensuring that housing hazards are managed safely and effectively.

This role is responsible for making sure that sufficient resources and governance arrangements are in place to deliver all statutory duties.

The Chief Executive also provides assurance to the Board and to external regulators that North Star is compliant, proactive, and fully meeting its legal obligations.

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| Executive Director of Assets & Growth         | <p>Has been appointed as Duty holder for Health &amp; Safety by the Chief Executive.</p> <p>Key responsibilities include:</p> <ul style="list-style-type: none"><li>• Provides strategic leadership and ensures resources are allocated for effective delivery.</li><li>• Oversees policy implementation and monitors organisational performance.</li><li>• Escalates serious incidents or compliance risks to the Chief Executive and Board.</li></ul>   |
| Director of Assets, Property & Sustainability | <p>Key responsibilities include:</p> <ul style="list-style-type: none"><li>• Provides strategic oversight of hazard management across service areas.</li><li>• Ensures alignment between compliance, repairs, voids, and capital programmes.</li><li>• Oversees contractor performance and ensures robust monitoring and reporting mechanisms are in place.</li><li>• Supports continuous improvement and ensures lessons learned are embedded.</li></ul> |
| Head of Property & Compliance                 | <p>Key responsibilities include:</p> <ul style="list-style-type: none"><li>• Operational lead for Awaab's Law compliance.</li><li>• Oversees hazard triage, risk assessments, and response management.</li><li>• Ensures procedures, timescales, and escalation routes are embedded into business processes.</li><li>• Produces compliance dashboards and reports for SMT, the Board, and regulators.</li></ul>   |

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| Property and Repairs Manager   | <p>Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Co-ordinates access for inspections and remedial works.</li> <li>• Manages contractor performance on day-to-day repairs and urgent remedial works.</li> <li>• Prioritises defect reports and ensures high-risk cases are escalated immediately.</li> <li>• Ensures compliance with statutory timescales for hazard resolution.</li> </ul>   |
| Customer Services Team (CST)   | <p>Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Receiving hazard reports from residents via telephone, email, or online channels.</li> <li>• Recording all details accurately in the Housing Management System (HMS).</li> <li>• Applying the triage framework to categorise cases in line with the statutory timescales (24 hours, 5 working days, or 10 working days).</li> <li>• Booking works or repairs directly where appropriate or arranging inspections when further investigation is required.</li> <li>• Escalating urgent or high-risk cases immediately to the Property Services or Compliance Teams.</li> <li>• Supporting the effective delivery of statutory timescales by ensuring accurate, timely, and consistent triage.</li> </ul> |
| Housing Teams (Housing Officers, Scheme Managers, Service Co-ordinators) | <p>Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Act as the eyes and ears on the ground.</li> <li>• Report visible hazards such as damp, mould, leaks, or structural concerns.</li> <li>• Support residents in reporting hazards and arranging access for inspections or works.</li> <li>• Provide additional support to vulnerable tenants during hazard resolution.</li> </ul>   |
| Compliance Co-ordinators/ Compliance Case Handler                        | <p>Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Maintain central hazard registers and records.</li> <li>• Monitor case progress against statutory timescales (24 hrs / 5 days / 10 days).</li> <li>• Escalate non-compliance, missed deadlines, or contractor failures.</li> <li>• Ensure all hazard cases are auditable, closed properly, and retained for at least five years.</li> </ul>   |
| Contractors & Service Providers  | <p>Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Must comply fully with Awaab's Law timescales and reporting requirements.</li> <li>• Report hazards or unsafe conditions immediately, even if outside scope of their contracted works.</li> <li>• Ensure only trained and competent staff undertake hazard investigations and remedial works.</li> <li>• Provide North Star with accurate and timely documentation following works.</li> </ul>  |

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| Residents | <p>Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Residents play a key role in hazard management and are expected to:</li> <li>• Report hazards such as damp, mould, leaks, or other unsafe conditions promptly.</li> <li>• Provide reasonable access for inspections, assessments, and remedial works.</li> <li>• Engage with North Star's communications and follow safety guidance where hazards are being addressed.</li> </ul> |
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## Policy Statement

North Star will take all reasonable steps to identify, assess, and resolve housing hazards in accordance with Awaab's Law and the staged implementation of the [Hazards in Social Housing \(England\) Regulations 2025](#).

We will ensure that all hazards, beginning with damp and mould in October 2025 and subsequently extending to all Category 1 hazards under the Housing Health and Safety Rating System (HHSRS), are managed effectively, within statutory timescales, and with residents' health, safety, and wellbeing at the centre of our approach.

In fulfilling this commitment, North Star will comply with all statutory duties under Awaab's Law, the Housing Act 2004, and the Homes (Fitness for Human Habitation) Act 2018.

We will operate a robust triage system for all reported or identified hazards, categorising each case in line with the statutory response timescales of 24 hours for emergency hazards that pose imminent risk of serious harm, five working days for urgent hazards that could cause significant harm if not addressed, and ten working days for all other Category 1 hazards.

Inspections and assessments will be carried out by trained and competent staff, with all findings recorded and evidenced within our compliance systems.

Where hazards are identified, we will implement remedial works promptly and escalate high-risk cases immediately. In situations where full repairs cannot be completed within the statutory timeframe, appropriate temporary measures will be provided, such as dehumidifiers, safe heaters, or temporary accommodation.

Every hazard case will be logged within our Housing Management System and tracked against a central hazard register, ensuring that records remain auditable for a minimum of five years.

We will monitor and manage contractor compliance closely, with performance measured against clear key performance indicators for timeliness, quality, and accuracy.

Where contractors fail to meet these standards, escalation procedures will be triggered to secure timely resolution and maintain compliance.

Communication with residents will always be transparent, with written confirmation provided following each inspection, setting out the outcome, the actions required, who will carry them out, and the timescale for completion.

Confirmation will also be provided once remedial works have been finalised.

North Star will provide additional support to vulnerable residents, recognising that certain hazards may disproportionately affect health and wellbeing. We will ensure that all staff and contractors involved in hazard management receive appropriate training and refresher learning to maintain competence and awareness of legal duties.

Compliance performance will be reported monthly to the Senior Management Team and quarterly to the Board, with findings integrated into North Star's wider assurance framework.

Finally, we will embed lessons learned from incidents, complaints, Housing Ombudsman determinations, and audit findings into continuous service improvement, ensuring that our approach to hazard management evolves in line with regulatory expectations and resident needs.

### Statutory Inspection and Response Requirements

Under Awaab's Law, North Star must investigate and remedy serious housing hazards within prescribed timescales. These requirements will apply from October 2025 for damp and mould hazards and will be extended in stages to cover all Category 1 hazards under the Housing Health and Safety Rating System (HHSRS).

### Inspections and Hazard Assessments

All reported or identified hazards will be:

- inspected and assessed promptly by a competent person.
- Assessments will follow the HHSRS framework, determining the severity and risk level of the hazard.
- Inspection findings will be recorded in the Housing Management System (HMS) and logged against the central hazard register.



### Statutory Response Timescales

North Star will ensure that all hazards are investigated and actioned within the legal timeframes set by Awaab's Law:

| Hazard Classification  | Landlord Action | Example Response  |
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| Emergency Hazard<br>Poses imminent risk of serious harm                  | 24 hours        | Emergency repairs, system isolation, temporary decant, or immediate safety measures.                  |
| Urgent Hazard<br>Could cause significant harm if not addressed           | 5 working days  | Damp and mould remedials, urgent heating repairs, fire safety works, electrical safety rectification. |
| Other Category 1 Hazards<br>Serious but not immediately life threatening | 10 working days | Structural remedials, excess cold, persistent damp, pest infestations, asbestos removal.              |

If works cannot be fully completed within the legal timescales, North Star will ensure that proportionate interim measures are put in place to safeguard residents. These may include the provision of heaters, dehumidifiers, temporary sealing, or, in more serious cases, temporary "Alternative accommodation".

All interim measures will be properly recorded and monitored, and they will always be followed by permanent remediation as soon as practicable to ensure the underlying hazard is fully resolved.

### Escalation of Delays or Failures

Any breach of statutory timescales will be escalated immediately to the Head of Property & Compliance to ensure swift corrective action. Where persistent delays or repeated contractor failures occur, these will be escalated further to the Executive Director of Assets & Growth and reported to the Board for oversight.

In the event of serious breaches, North Star will notify the Regulator of Social Housing and, where appropriate, the Housing Ombudsman in line with our regulatory duties.

### Training, Competency and Continuous Learning

North Star recognises that the safe and compliant management of housing hazards under Awaab's Law depends on the competency and awareness of all those involved, including internal staff, contractors, and service providers. We are committed to ensuring that all personnel are appropriately trained, accredited, and confident in fulfilling their duties.

### Promoting a Safety-Driven, Skilled Culture

We will foster a proactive culture of safety and compliance by:

- Ensuring all staff understand their roles and responsibilities under Awaab's Law.
- Providing mandatory training on hazard recognition, triage, and timescales.
- Using lessons learned from incidents, complaints, Ombudsman findings, and audits to strengthen practice and awareness.

### Internal Staff Competency

North Star will ensure that all employees with responsibilities relating to hazard management receive training appropriate to their role, including:

- Induction training for all new staff in property, compliance, and housing roles, covering hazard reporting and Awaab's Law timescales.
- Awareness training for housing teams, scheme managers, and frontline staff on recognising damp, mould, leaks, excess cold, and other HHSRS hazards.
- Specialist training for compliance and property staff on HHSRS risk assessment, hazard triage, and escalation procedures.
- Refresher training at least every two years, or sooner following incidents, policy changes, or updates in regulation.

Line managers are responsible for ensuring their teams are booked onto relevant training and for verifying competence prior to assigning tasks involving hazard management or statutory compliance activities.

### Contractor and Service Provider Competency

All contractors and service providers engaged in hazard inspection or remedial works must demonstrate technical competence and compliance with Awaab's Law

- Membership of relevant professional or trade bodies where appropriate.
- Compliance with North Star's health and safety, safeguarding, and customer service standards.

Contractors must not undertake hazard assessments or complex remedial works unless competence and authorisation have been confirmed by North Star.

### Continuous Learning and Improvement

North Star will embed continuous learning into hazard management by:

- Reviewing training needs following audits, incident investigations, and Ombudsman determinations.
- Updating internal guidance and training materials to reflect regulatory changes and sector best practice.
- Sharing lessons learned across teams, contractors, and residents where relevant, to prevent recurrence and improve service outcomes.

## Performance Monitoring and Governance

North Star is committed to robust performance monitoring and transparent governance to demonstrate compliance with Awaab's Law and provide assurance to residents, the Board, and regulators.

### Key Performance Indicators (KPIs)

We will monitor and report on the following indicators:

- Percentage of hazard cases investigated within required timescales (24 hrs / 5 days / 10 days).
- Percentage of hazard cases where remedial works were completed within required timescales.
- Number of open cases.
- Number of overdue cases, split by timescale category and contractor.
- Contractor performance against agreed KPIs, including timeliness, accuracy of reporting, and resident satisfaction.
- Resident communication compliance – proportion of cases where inspection findings and actions were confirmed to residents in writing.

## Governance and Reporting Structure

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| Compliance Dashboards        | Produced monthly by the Compliance Team Manager, showing current position, overdue cases, and trend analysis.                       |
| Senior Management Team (SMT) | Receives monthly compliance updates, including exceptions, risks, and lessons learned.  |
| Board                        | Receives quarterly assurance reports, highlighting overall compliance, significant risks, and any breaches of statutory timescales. |

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| Health and Safety Steering Group | Reviews serious incidents, contractor performance issues, and systemic risks, ensuring immediate escalation where required. |
| Resident Assurance               | Residents will be updated through published performance reports, and annual summaries of compliance will be made available. |

## Escalation and Exception Management

Any case that breaches the statutory timescales will be escalated immediately to the Head of Property & Compliance to ensure prompt intervention.

Where breaches are persistent, or where contractor underperformance or systemic failures are identified, the matter will be escalated to the Executive Director of Assets & Growth and reported to the Board.

In situations involving serious or repeated breaches, North Star will notify the Regulator of Social Housing and, where appropriate, the Housing Ombudsman, in full compliance with our regulatory obligations.

## Continuous Oversight

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| Internal Audit                         | Periodic audits will review compliance processes, data accuracy, and governance controls.                               |
| External Audit/Independent Review      | Commissioned where necessary to provide assurance on performance and regulatory compliance.                             |
| Learning from Incidents and Complaints | Outcomes of investigations, Ombudsman determinations, and complaints will be integrated into service improvement plans. |

## Resident Engagement and Transparency

North Star recognises that open, honest, and timely communication with residents is central to the effective delivery of Awaab's Law. We are committed to ensuring that residents are fully informed about hazards in their homes, the actions we will take, and the timescales within which those actions will be completed.

## Resident Rights and Expectations

North Star recognises that residents have a fundamental right to live in a home that is safe, healthy, and free from serious hazards. In line with Awaab's Law, we will ensure that residents are kept fully informed whenever a hazard is identified in their home.

Residents will receive clear information, which will include:

- The findings of any inspection or assessment.
- The actions required to remedy the hazard.
- The statutory timescales for completion of works (24 hours, 5 working days, or 10 working days depending on risk).
- Any temporary measures being put in place until permanent works are completed.

Once remedial works have been completed, residents will also receive written confirmation, setting out the actions taken and the final resolution of the case.

## Communication Standards

All information provided to residents will be communicated in plain English to ensure it is clear and accessible. Where required, alternative formats such as large print, braille, or translated versions will be made available to meet individual needs.

Updates will be provided through a range of channels, including letters, text messages, emails, phone calls, and face-to-face visits, with the method of communication tailored to the residents' preference and level of vulnerability.

Throughout the process, residents will be kept informed of progress, and particular care will be taken to provide timely updates if works are delayed or if further action becomes necessary.

## Support for Vulnerable Residents

North Star recognises that some residents may require additional support to fully engage with the process of hazard identification and remediation. Extra assistance will be provided to those with vulnerabilities, including residents

with health conditions, disabilities, or language barriers. Where a hazard poses a significant risk to health, immediate action will be taken to mitigate harm.

This may involve temporary relocation, or the provision of measures such as dehumidifiers, heaters, or other interim solutions until permanent works are completed. Housing Officers and Scheme Managers will play a central role in supporting vulnerable residents during inspections and throughout the course of remedial works, ensuring their needs are met at every stage.

### Resident Feedback and Complaints

Following the completion of remedial works, residents will be invited to provide feedback to confirm their satisfaction with the outcome and to raise any ongoing concerns.

Where residents are dissatisfied with the way their hazard report has been managed, they will have access to North Star's Complaints Policy, which includes clear escalation routes up to and including the Housing Ombudsman.

All feedback and complaints will be reviewed regularly, allowing North Star to identify trends, strengthen services, and demonstrate compliance with Awaab's Law.

### Transparency and Assurance

North Star is committed to being open and transparent with residents about how hazards are managed. We will publish annual performance updates that include statistics on compliance with Awaab's Law timescales and hazard response performance.

In addition, residents may request access to relevant records relating to their home, such as inspection reports or remedial action logs, subject to the requirements of data protection legislation. This approach ensures residents can see clear evidence of the steps being taken to keep their homes safe and healthy.

## Audit, Review and Continuous Improvement

North Star is committed to maintaining robust assurance arrangements to ensure ongoing compliance with Awaab's Law and to embed continuous improvement across all areas of hazard management.

### Internal Monitoring

The Head of Repairs and Compliance will:

- Review hazard registers, case progress, and timescale adherence monthly, reporting exceptions through the compliance dashboard.
- Oversee internal monitoring, ensuring that cases are investigated, actions are proportionate, and statutory timescales are met.

### Quarterly Reporting

A compliance report will be collated for each Senior Management Team (SMT) meeting. This report will provide a clear summary of compliance performance, highlight open cases, identify overdue actions, and capture lessons learned during the period. In addition, high-level updates will be shared with the Board to ensure ongoing assurance and oversight of North Star's compliance with Awaab's Law.

### Independent Assurance

Independent assurance will play an important role in testing the effectiveness of North Star's approach to Awaab's Law. Internal Audit will carry out periodic reviews to assess compliance, focusing on the accuracy of data, the performance of contractors, and the robustness of escalation procedures.

Where additional assurance is required, external independent audits may be commissioned to validate North Star's arrangements and to provide further confidence to both the Board and regulators that statutory obligations are being met in full.

### Policy Review

This policy will be reviewed:

- Annually - as part of the scheduled policy review cycle.
- Following any significant incident, Ombudsman determination, or regulatory finding.
- When legislation, guidance, or sector best practice changes including staged extensions of Awaab's Law to cover additional HHSRS Category 1 hazards.



## Learning and Continuous Improvement

North Star will ensure that lessons learned from incidents, complaints, audits, and resident feedback are captured and embedded into practice. This will include:

- Updating training programmes and operational guidance.
- Strengthening contractor performance frameworks.
- Improving communication standards with residents.
- Enhancing data quality and reporting systems to support accurate compliance monitoring.

## Appendices

A – Emergency Hazard process flow

B – Urgent/Significant Hazard process flow

C – Example written report