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5 March 2024

Dear Awaab's Law Consultation team,

## **NFCC Response to Awaab's Law: Consultation on Timescales for Repairs in the Social Rented Sector**

The National Fire Chiefs Council (NFCC) welcomes the opportunity to respond to this consultation on timescales for repairs in the social rented sector. NFCC is the professional voice of the UK fire and rescue services (FRS) and is comprised of a council of UK Chief Fire Officers. This response was collated by NFCC's Protection Reform Unit and Strategy and Policy Team. Our response reflects their expertise and competence with the subject matter.

NFCC is committed to creating safer, healthier, and more resilient communities and to reducing the risk to people, including vulnerable people, within the home environment. Creating safer homes for people is also a central aim of the varied Protection and Prevention activities undertaken by FRS across the UK.

Every individual should feel protected and secure in their homes, and standardised timescales for repairs in the social housing sector will help to achieve this. It is, however, crucial that identifying and remedying hazards, or increased pressure to meet new timescales, do not have a knock-on impact on other safety measures in buildings and put residents at risk.

### **Timescales for Repairs**

NFCC recognises the need for residents' complaints around health and safety to be resolved by landlords within clearly established timeframes. The proposed Awaab's Law timescales are reasonable, taking into account that in some situations they may not be achievable for reasons beyond the landlord's control, including difficulty in finding competent assessors or accessing the property. Formalising the timescales will create a consistent set of expectations among social housing residents and landlords, strengthen

protections for social housing residents against poor health outcomes, and ensure that social housing residents feel safe in their homes. It is, however, crucial that any work to identify and remedy risks and hazards, or increased pressure to meet new timescales, do not compromise fire safety measures within buildings and put residents at risk.

## **Hazards in Scope**

NFCC is pleased to see that the Government plans to extend the scope of Awaab's Law beyond damp and mould to cover all 29 Health and Housing Safety Rating System (HHSRS) health and safety hazards. This is particularly important as some of the HHSRS hazards, while not being a category 1 hazard, may indirectly impact and accentuate another hazard. For example, damp and mould or cold conditions could encourage the use of portable heaters in the home, which increase the risk of fire. The proposed threshold of "significant risk" to the health or safety of the resident also improves on the limitations of the HHSRS rating system by reflecting how residents' vulnerabilities and risk can vary on an individual basis.

NFCC would, however, like clarity around how the introduction of Awaab's Law will interact with the proposals emerging from the Government's review of the HHSRS rating system, Decent Home Standard reviews, the implementation of the Building Safety Act 2022, the Fire Safety (England) Regulations 2022, and the Regulatory Reform (Fire Safety) Order 2005.

## **Fire Safety**

The Government must approach social housing reforms holistically, and be mindful of the potential unintended consequences that any action may have on fire safety. For example, the presence of damp and mould encourages people to use alternative heating sources, such as portable heaters, to tackle the problem, and these pose a fire risk. NFCC have previously recommended that landlords are encouraged to implement measures to prevent mould and damp within the home, as these measures result in reduced reliance on heating methods that may pose a greater comparative risk of fire. By introducing requirements for social landlords to address damp and mould within a fixed time period, the Government's proposals will help to achieve this.

However, the Government and landlords must also recognise that actions to resolve problems with damp and mould can also impact fire safety measures. The installation of intermittent extract fans, ventilation, or any other measures to prevent damp and mould can compromise compartmentation and other fire safety provisions. Efforts should be made to ensure that systems do not vent into service ducts or lift shafts, which can provide a path for the spread of smoke and fire. Vents need to be appropriately fire stopped wherever they pass through any compartment lines, for example via the use of intumescent collars.

Furthermore, the introduction of timescales for identifying and repairing hazards will inevitably and rightly increase pressures on landlords to repair hazards. This may encourage, even unintentionally, landlords to neglect or overlook other aspects of a property's safety when identifying or undertaking repairs, which could have a knock-on effect on the safety of residents, placing them at risk from another hazard. Any regulations must be introduced in a proportionate way to limit the potential for landlords to make

unintentional compromises to fire safety and other life safety measures. It is also imperative that risks are properly investigated and addressed and a culture of ‘closing the complaint’ within the set timeframe does not emerge.

The proposed new timescales may unintentionally encourage changes in behaviour whereby landlords are less willing to proactively identify hazards, thereby placing burdens of identifying hazards exclusively onto the resident. While residents are of course best placed to identify a range of hazards within in their own homes, other hazards, particularly those relating to fire risks, are not easily identifiable, for example issues with cladding or cavity barriers or faults with key safety systems such as smoke control systems. The burden of identifying risk cannot fall entirely on residents. It is essential that new regulations do not encourage a shift in behaviour whereby landlords scale back from their duties to identify and resolve these risks or create a situation of overlapping priorities to comply with different legislative requirements that means that none are addressed efficiently or effectively.

### **Written Summary of Investigation Findings**

NFCC welcomes the proposals for landlords to provide a written summary of investigation findings and the proposed timescales, which offer further protection to residents. Clear, open, and effective communication between landlords and residents is fundamental to improving people’s safety within their homes and aligns with existing legislative requirements for resident engagement and the provision of information to residents and relevant persons.

NFCC agrees that landlords must consider the accessibility and language needs of the resident when compiling the written summaries. Clarity in format of these summaries and the language used is crucial, including making allowances where English is not the resident’s primary language, given the distressing situations that residents may find themselves in and the potentially serious impact on their health and well-being.

We agree with the list of information to be provided in the written report, with some additions. The written report should, where applicable, detail whether temporary repairs will impact on any other safety features that could either indirectly affect residents’ health and safety or expose residents to a different risk. The report should also include information on what the resident can and should do, firstly, in the interim period whilst any temporary hazard mitigations might in place, and, secondly, once the permanent repairs have been completed to avoid reoccurrence of the hazard. The Government could also ensure that the reports include information on how residents can challenge a landlord’s assessment of a hazard or timeline for repairs if necessary.

NFCC recommends that the Government produce a template written summary report to assist landlords and ensure they provide all the required information to residents. This will help clarify expectations between landlords and residents.

### **Regulation and Enforcement**

One of the NFCC’s overarching objectives is the promotion of a consistent and coordinated approach to fire safety regulation. The Regulatory Reform (Fire Safety) Order 2005 (as amended 2023), the Building Safety Act 2022, and the Social Housing Regulation Act 2023

place overlapping requirements and responsibilities on social housing landlords and residents, as well as burdens on enforcing authorities such as FRS and local authorities. Awaab's Law adds further requirements and responsibilities for landlords. The various pieces of legislation and regulations create an opaque regulatory framework which can mean that residents and landlords are unsure what is expected of them and that enforcing authorities are unsure of which legislation takes precedence or has suitable powers to ensure improvements to the safety of residents.

Guidance should clearly signpost landlords and residents to the relevant regulations and other pieces of statutory and non-statutory guidance to ensure responsibilities for landlords, Responsible Persons, and residents are clear, and that all parties are aware of any other resources that may be available to them. NFCC also recommends that the Government clarifies which regulation and legislation takes precedence where there is an overlap.

### **Equity Between the Social Housing and Private Rented Sectors**

NFCC recommends a cohesive and consistent set of regulations and expectations across both the social housing and private rented sectors to mitigate social inequities and help make safe housing a right to all members of society rather than a privilege to some. Setting timescales for emergency repairs in social housing will help to establish consistent expectations for residents and landlords in this sector, which is positive, but introduces a disparity between social housing and private rentals. We recommend these proposals are extended to the private rented sector and ask for greater clarity on how these proposals would be applied to the private rentals alongside the Government's plans to extend the Decent Homes Standard to the private rental sector. As NFCC's responses to various Government consultations have highlighted, establishing a unified and uniform set of standards for residents, irrespective of their housing situation, is crucial in avoiding a two-tier system for safety between private rentals and social housing.

NFCC welcomes further opportunities to inform updates and improvements relating to homes being free from serious hazards and risks.

Yours sincerely,

**Tim Broom**  
Head of the Protection Reform Unit  
National Fire Chiefs Council

**Sarah Brown**  
Head of Prevention  
National Fire Chiefs Council

## Demographic Questions

### Question 1. In which capacity are you completing these questions?

Other (professional membership organisation).

### Question 2. If responding on behalf of an organisation, please specify which organisation:

National Fire Chiefs Council Ltd.

### Question 3. Social landlords only: where are the properties you manage primarily based?

Not applicable.

### Question 4. Social landlords only: How many rental properties do you manage?

Not applicable.

## Scope of Awaab's Law: Hazards

### Question 1. Do you agree that Awaab's Law should apply to all HHSRS hazards, not just damp and mould? (Y/N)

NFCC agrees that that Awaab's Law should be extended beyond damp and mould and apply to all 29 HHSRS health and safety hazards that pose a risk to residents' health and safety. This is particularly important as some of the HHSRS hazards, while not being a category 1 hazard, may indirectly impact and accentuate another hazard. For example, damp and mould or cold conditions could encourage the use of portable heaters in the home, which increase the risk of fire.

Many of the HHSRS hazards cover issues that are relevant to fire and rescue services' (FRS) prevention, protection, and response work, including fire, electrical hazards, flames and hot surfaces, explosions, structural collapse, un-combusted fuel gas, and carbon monoxide and fuel combustion products. If the Government decides not to apply Awaab's Law to all 29 HHSRS hazards, NFCC will need reassurance that fire safety is still considered on an equal footing as a risk to resident safety.

NFCC would like clarity around how Awaab's Law proposals interact with the Government's review of the HHSRS rating system, for example the proposal [announced in September 2023](#) to amalgamate the "fire" hazard with the "explosions in dwellings" hazard.

In order to make safe housing a right to all members of society, these proposals should be extended across all tenures and should not be exclusive to the social housing sector.

### Question 2. Do you agree the right threshold for hazards in scope of Awaab's Law are those that could pose a significant risk to the health or safety of the resident? (Y/N)

NFCC agrees with the proposed threshold for hazards in scope of Awaab's Law, as this reflects how residents' vulnerabilities and risk can vary on an individual basis. The proposed threshold is also an improvement on the limitations of the HHSRS rating system.

In NFCC's response to the review of the HHSRS rating system in 2021, we raised serious concerns around the principles underpinning the evaluation of risk and the hazard scoring mechanisms in the HHSRS system. From the perspective of FRS, vulnerability and dependencies are considered when looking at the risk of fire to persons. The only vulnerability factor that can be applied in the HHSRS scoring process is age. This could result in some of the most vulnerable members of society remaining at a disproportionately high risk from injury and death from fire in their own dwellings, particularly in multi-occupied properties. The HHSRS scoring systems discounts or ignores increased risks within multi-occupied properties, such as supported living, sheltered, hostel accommodation, and houses of multiple occupation (HMOs), where many residents have vulnerabilities that make them dependent on others (staff or FRS personnel) and effective management arrangements in the event of a fire.

It is important for the Government to clarify what constitutes a significant risk, as this will be variously interpreted by different people in different situations. Any definition of significant risk must also be proportionate in terms of the actual risk versus the perception of risk and clarify how landlords make judgement in these situations. Proportionality is important in terms of the costs and benefits to landlords and residents, taking into account the potential for knock-on impacts that any repair work may have on other safety measures. Due regard must be also given to ensure that residents and leaseholders are not being burdened with costs for rectifying health and safety hazards that are beyond their control.

Though landlords are required to factor evidence from third parties into their assessment of hazards, and are encouraged to utilise a range of Government guidance, the landlord's judgement will be the determining factor in whether repairs are undertaken. Relying on landlords' judgement to determine a significant risk could lead to negative outcomes in terms of residents' health and safety, as a landlord's assessment of risk may differ from that of residents who are often better placed to identify the impact of certain hazards on their health and wellbeing. It is crucial residents are informed of the routes through which they can challenge a landlord's assessment of a hazard or their proposed timeline for repairs if necessary.

**Question 3. If you have answered 'no' to any of the questions in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text).**

Not applicable.

## **Proposal 1: Initial investigations of potential hazards**

**Question 4. Do you agree with the proposal that social landlords should have 14 calendar days to investigate hazards? (Y/N)**

NFCC recognises the need for residents' complaints around health and safety to be resolved by landlords within set timescales, as this will ensure that social housing residents are safer and healthier in their homes. NFCC supports the 14-day timescale to investigate hazards, and welcomes the enhanced safeguards which will reduce the burden on social housing residents and the NHS. However, we recognise that sometimes this timescale will not be achievable due to factors beyond a landlord's control. For example, in certain

circumstances, it may be difficult to secure the services of someone with the appropriate competency to undertake the initial investigation within 14 calendar days, as not all landlords will have the required competency to do this.

The Government must approach these reforms holistically, and be mindful of the potential unintended consequences that any action may have on fire safety. It is crucial that increased pressure to meet new timescales to identify and remedy hazards does not result in compromises to other safety measures within buildings, placing residents at risk.

The new timescales may encourage changes in behaviour where landlords are less willing to proactively identify hazards, thereby placing the burdens of identifying risk exclusively onto the resident. While residents are of course best placed to identify a range of hazards within in their own homes, other hazards, particularly those relating to fire risks, are not easily identifiable, for example issues with cladding or cavity barriers or faults with key safety systems such as smoke control systems. It is essential that new regulations do not encourage a shift in behaviour whereby landlords scale back from their duties to identify and resolve these risks or create a situation of overlapping priorities to comply with different legislative requirements that means that none are efficiently and effectively addressed.

Further, the increased time pressures could lead landlords to overlook other aspects of a property's safety when identifying or undertaking repairs, which could have a knock-on effect on fire safety and life safety. This may be exacerbated where multiple hazards are identified, for example issues with both damp and fire compartmentalisation, as landlords may struggle to identify which risk is greater and needs addressing first. Indeed, the proposals do not fully clarify how landlords prioritise multiple issues in the homes they manage in relation to the Awaab's Law timescales. Any regulations must be introduced in a proportionate way to limit the potential for landlords to make unintentional compromises to fire safety and life safety. It is also imperative that risks are properly investigated and addressed and a culture of 'closing the complaint' within the set timeframe does not emerge.

The presence of hazards in the home cannot be dismissed by landlords as their resident's "lifestyle choice". Nonetheless, education about the role that landlords and residents play in reducing hazards is important, for example the imperative of residents informing landlords of their concerns as early as possible and not at the point when a hazard has become a significant risk to health and safety.

**Question 5. Do you agree that medical evidence should not be required for an investigation? (Y/N)**

NFCC agrees that medical evidence should not be required for investigations into hazards, recognising that mandating this will increase burdens on GPs. However, there may be occasions where medical evidence is necessary, such as with repeat incidents. Medical information could also assist the landlord in identifying other safety concerns that place the resident at risk beyond what has been reported as a hazard under Awaab's Law. For example, if the resident requires medical oxygen and has a disability or mobility issue, it is important that medical verification is obtained as the landlord may need to consider whether this has an indirect consequence on the risk of fire in the property and whether a person-centred fire risk assessment is required. Medical evidence should not be required

as standard, but may also provide landlords with important information to feed into the repair plans, for example decision making surrounding how to fix issues with damp and mould in a way that does not impact negatively on residents' health and safety or compromise other safety measures, for example fire compartmentation. Where medical evidence is presented, safeguarding and GDPR rules must be followed.

**Question 6. If you have answered 'no' to any of the questions in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text)**

Not applicable.

## **Proposal 2: Written summaries of investigation findings**

**Question 7. Do you agree with the proposal for registered providers to provide a written summary to residents of the investigation findings? (Y/N)**

NFCC agrees with the proposals for landlords to provide a written summary of investigation findings and the proposed timescales, which offer further protection to residents. Clear, open, and effective communication between landlords and residents is fundamental to improving people's safety within their homes and aligns with existing legislative requirements for resident engagement and the provision of information to residents and relevant persons under the Building Safety Act 2022, the Fire Safety Order 2005, the Fire Safety England Regulations 2022, the Housing and Regeneration Act 2008 and the Social Housing (Regulation) Act 2023. The benefits of improved resident–landlord engagement and greater resident safety outweigh the expected increased costs to landlords.

NFCC agrees that landlords must consider the accessibility and language needs of the resident when compiling the written summaries. Clarity in format of these summaries and the language used is crucial, including making allowances where English is not the resident's primary language, given the distressing situations that residents may find themselves in and the potentially severe risks to residents' health and well-being.

NFCC believes the Awaab's Law proposals should be extended to the private rented sector, as a cohesive and consistent set of expectations for residents and landlords across both the social housing and private rented sectors will mitigate social inequities and help make safe housing a right to all members of society.

**Question 8. Do you agree with the minimum requirements for information to be contained in the written report? (Y/N)**

Clear communication between landlords and residents and a shared understanding of each other's responsibilities for safety in the home is important to ensure safe housing, but especially to build awareness of the knock-on impacts any action taken by residents or landlords may have on other safety measures. NFCC supports the inclusion of information on the investigation and any follow-up investigations, details of any identified hazards and whether they pose a significant risk to residents, the temporary repairs and permanent repairs required and likely timescales, and contact details for the registered provider. We recommend further information is included as standard.



The written report must, where applicable, detail if temporary repairs will impact on any other safety features that could either indirectly affect residents' health and safety or expose residents to a different risk. For example, if portable heaters are used as a temporary measure to dry out damp and mould, this would increase the fire risk to residents. The written report must also include information on what the resident can and should do, firstly, in the interim period whilst any temporary hazard mitigations might in place, and, secondly, once the permanent repairs have been completed to avoid reoccurrence of the hazard. The Government could also ensure that the reports include information on how residents can challenge a landlord's assessment of a hazard or timeline for repairs if necessary.

NFCC recommends that the Government produce a template written summary report to assist landlords and ensure they provide all the required information to residents. This will help clarify expectations between landlords and residents.

**Question 9. Do you agree registered providers should have 48 hours to issue the written summary? (Y/N)**

Please see our response to question 7 above.

**Question 10. If you have answered 'no' to any of the questions in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text)**

Not applicable.

### **Proposal 3: Beginning repair works**

**Question 11. Do you agree with the proposal that if an investigation finds a hazard that poses significant risk to the health or safety of the resident, the registered provider must begin to repair the hazard within 7 days of the report concluding? (Y/N)**

There are other organisations that are better placed to determine whether beginning repairs works within seven days of the report is a realistic timescale. However, NFCC recommends that due consideration is given to the lessons learned from the experience of remediating unsafe cladding across the built environment post-Grenfell. From this experience, we have found that even where there are good intentions to remediate, it is not always possible or practical to remediate according to strict timescales due to difficulties appointing a competent person to undertake the work, lengthy procurement processes, necessary risk assessments, or the decanting and rehousing of residents if required.

In the context of Awaab's Law, these timescales are further complicated by the potential emergence during repair work of other, potentially more urgent hazards that registered providers may be required to deal with in other properties. For example, there may be situations where an in-house repair worker or contractor is reassigned from work on a fire or building safety risk under the Building Safety Act or Fire Safety Order to attend urgent hazards under Awaab's Law. Further clarity is needed on how landlords manage these situations, as the landlord may be deemed non-compliant under the Building Safety Act or

Fire Safety Order, as well as how this is communicated to affected residents and relevant regulatory bodies such as the FRS and the Building Safety Regulator.

Consideration is required of how new provisions under Awaab's Law will impact any contingency arrangements if repair works do not go according to plan or uncover other, previously unknown risks to resident safety.

**Question 12. Do you agree that in instances of damp and mould, the registered provider should take action to remove the mould spores as soon as possible? (Y/N)**

NFCC agrees that registered providers should take action against damp and mould as soon as possible. Nonetheless, it is crucial that efforts to address damp and mould do not place residents at risk of a different hazard, for example by increasing the fire risk. The installation of intermittent extract fans, ventilation, or any other measures to prevent damp and mould can compromise compartmentation and other fire safety provisions. Efforts should be made to ensure that systems do not vent into service ducts or lift shafts, which can provide a path for the spread of smoke and fire. Vents need to be appropriately fire stopped wherever they pass through any compartment lines, for example via the use of intumescent collars. An assessment, in agreement with the resident, is necessary to ensure a proportionate approach to damp and mould is taken and that appropriate impact assessments that consider other risk factors such as fire and building safety are undertaken.

NFCC highly recommends that registered providers take active preventive measures to avoid the growth of mould and damp in households. This approach can ultimately lead to a decreased dependence on alternative heating methods that pose a higher risk of fire.

**Question 13. Do you agree with the proposed interpretation of 'begin' repair works? (Y/N)**

NFCC agrees defining "begin repair works" will clarify expectations around repair work for residents and landlords, but notes that other organisations are better placed to comment on this specifics of any definition.

**Question 14. If you have answered 'no' to any of the questions in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text)**

Not applicable.

## **Proposal 4: Completing repair works**

**Question 15. Do you agree that the registered provider must satisfactorily complete repair works within a reasonable time period, and that the resident should be informed of this time period and their needs considered? (Y/N)**

NFCC agrees with this proposal, noting that it is also important that any delays or changes with the repair works should be clearly communicated to the resident. This is the approach taken by insurers and home maintenance service providers.

**Question 16. If you have answered 'no' to the question in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text)**

Not applicable.

## **Proposal 5: Timescales for emergency repairs**

**Question 17. Do you agree that timescales for emergency repairs should be set out in legislation? (Y/N)**

NFCC agrees with this proposal but asks for clarity over whether this will include fire safety repairs that are deemed as an emergency and are considered a significant risk to residents. We also recommend the Government draws on the lessons learned from the cladding remediation across the built environment after the Grenfell Tower fire. The experience of cladding remediation has demonstrated that short timeframes are not always possible when addressing critical life safety issues, leading to expensive interim measures such as temporary accommodation to rehouse residents or waking watches. There are also situations where a short timescale may not be practical for other reasons, for example, where the risk was reported late at night or over the weekend and there was no emergency out-of-hours service provision in place. Implementing out-of-hours services is very costly, and would create an undue financial burden on the resident if the costs are passed on to them. It is also important that residents are aware of the role they play in meeting the proposed timescales, especially regarding providing access to the property.

The Government notes that the majority of social landlords have policies in place stipulating different timeframes for emergency or urgent repairs (paragraph 99), but does not provide evidence for this claim – it is unclear whether these timeframes are consistently adhered to in practice.

**Question 18. Do you agree that social landlords should be required by law to action emergency repairs as soon as practicable and, in any event, within 24 hours? (Y/N)**

Please see the response to question 17 above.

**Question 19. If you have answered 'no' to any of the questions in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text)**

Not applicable.

## **Proposal 6: Decanting if the property cannot be made safe immediately**

**Question 20. Do you agree that landlords should arrange for residents to stay in temporary accommodation (at the landlord's expense) if the property can't be made safe within the specified timescales? (Y/N)**

NFCC agrees that landlords should arrange for residents to stay in temporary accommodation at the landlord's expense. It is, however, crucial that the process of decanting and relocating residents does not have any knock-on impacts on fire safety.

The efforts to remediate unsafe cladding, structural defects, and fire safety issues across the built environment have raised a number of important lessons around decanting processes that we recommend the Government takes on board when implementing Awaab's Law. For example, there have been situations where landlords have been unable to find suitable alternative accommodation (e.g., where resident households have specific need or in areas of high demand for social housing). There have also been situations where suitable alternative accommodation has been provided but residents have, for understandable reasons, refused to leave their home, limiting the ability of landlords to address hazards, and potentially making the situation worse, e.g., by encouraging the spread of damp and mould, which can also impact fire safety. There have also been situations where repair work for damp and mould has identified other health and safety risks, increasing the cost of repairs and the length of time residents are displaced, or where the cost of repairs is so high that demolition of the building is the only economically viable option.

We recommend the Government builds on the wealth of experience of these issues within NFCC, the Department for Levelling Up, Housing, and Communities, Local Authorities, FRS, and the Building Safety Regulator.

**Question 21. If you have answered 'no' to the question in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text)**

Not applicable.

## **Proposal 7: Record-keeping**

**Question 22. Do you agree that Awaab's Law regulations should include provisions for a defence if landlords have taken all reasonable steps to comply with timeframes, but it has not been possible for reasons beyond their control? (Y/N)**

NFCC supports this proposal, though further clarity is needed regarding the considerations and procedures where residents fail to engage on matters relating their health and safety. Clarity is also needed regarding how or if residents will be held accountable if the hazard remains despite a landlord taking all reasonable steps to resolve this in compliance with Awaab's Law but there has been a lack of engagement from the resident. This is particularly important if the hazard has the potential to impact the health and safety of neighbours, putting others at risk. It is crucial that residents are aware of their role and responsibility in keeping themselves and other residents safe.

**Question 23. If you have answered 'no' to the questions in this section, please provide an explanation (with evidence where possible) and/or an alternative suggestion (free text)**

Not applicable.

## Impact assessment

**Question 24. Do you agree with the assessment that proposals 1, 3, 4, 5, 6 and 7 will create small net additional costs to the sector? (Y/N)**

NFCC believes there is considerable economic value in preventing harm before it has occurred. Whilst it has been difficult to calculate this in monetary value, the existence of fire safety standards and legislative requirements in consumer goods, which reduce the number of fires, have large potential benefits in terms of a reduced prevalence of fire-related injuries and fatalities. These principles can be extended to the hazards in scope of Awaab's Law, and suggest that the additional costs to the sector, which are small and will fall mostly on landlords, will be outweighed by the benefit of preventing harm to large numbers of social housing residents, many of whom are vulnerable members of communities.

**Question 25. If not, please can you provide additional information? (Free text)**

Not applicable.

**Question 26. Do you agree with the assessment of the net additional costs of proposal 2? (Y/N)**

Please see our above response to question 24.

**Question 27. If not, please can you provide additional information? (Free text)**

Not applicable.

**Question 28. Do you agree with the assumptions we have made to reach these estimates? (Y/N)**

Please see our above response to question 24.

**Question 29. If not, please can you provide additional information? (Free text)**

Not applicable.