

Response ID ANON-VARZ-UUKG-Y

Submitted to Awaab's Law: Consultation on timescales for repairs in the social rented sector
Submitted on 2024-03-05 15:19:11

Demographic Questions

1 In which capacity are you completing these questions?

Other

If other, please specify: :

Coalition of charities and campaign groups

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

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End Fuel Poverty Coalition

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

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

Not Answered

Scope of Awaab's Law: Hazards

5 Do you agree that Awaab's Law should apply to all HHSRS hazards, not just damp and mould?

No

6 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?

Yes

7 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.

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:

The concern of our members is that extending Awaab's Law to all HHSRS hazards is not practicable, as it includes like noise and overcrowding that landlords can't reasonably fix in a specified timeframe.

However, equally we do not support the Law only applying to damp and mould only and not to any of the other hazards.

We are particularly keen to stress that it should extend to excess cold.

If Awaab's Law was to extend to excess cold, it would give social landlords a legal requirement to (e.g.) fix broken boilers in certain timeframes. Our members have seen far too many examples of people having broken boilers for months on end and therefore it is our view that excess cold would be a vital hazard to include.

Proposal 1: Initial investigations of potential hazards

8 Do you agree with the proposal that social landlords should have 14 calendar days to investigate hazards?

Yes

9 Do you agree that medical evidence should not be required for an investigation?

Yes

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.

?:

Proposal 2: Written summaries of investigation findings

11 Do you agree with the proposal for registered providers to provide a written summary to residents of the investigation findings?

Yes

12 Do you agree with the minimum requirements for information to be contained in the written report?

Yes

13 Do you agree registered providers should have 48 hours to issue the written summary?

Yes

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

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:

Proposal 3: Beginning repair works

15 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 seven days of the report concluding?

Yes

16 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?

Yes

17 Do you agree with the proposed interpretation of 'begin' repair works?

Yes

18 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

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:

Proposal 4: Completing repair works

19 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?

Yes

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

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

Proposal 5: Timescales for emergency repairs

21 Do you agree that timescales for emergency repairs should be set out in legislation?

Yes

22 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?

Yes

23 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

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:

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

24 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?

Yes

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

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:

Proposal 7: Record keeping

26 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?

No

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

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

Broadly we understand the need for this clause. However, for vulnerable groups it may not be enough to rely on direct contact between the landlord and the occupants (or their appointed representative).

If normal channels have not been successful, the landlord should also be expected to attempt other proactive methods of communication, for example via neighbours or community groups.

We are also concerned that three attempts may not be sufficient. In the recent Ofgem work on energy firms contacting vulnerable groups before taking alternative action, 10 attempted contacts - by varied methods of communication - was accepted as good practice.

It is also vital that the varied methods of communication are included in the guidance. Electronic correspondence or phone calls may not be suitable for some groups.

Impact Assessment - assessing the costs and benefits of Awaab's Law

28 Do you agree with the assessment that proposals 1, 3, 4, 5, 6 and 7 will create small net additional costs to the sector?

No

29 If not, please can you provide additional information?

If not, please can you provide additional information?:

N/A not an area of expertise.

30 Do you agree with the assessment of the net additional costs of proposal 2?

No

31 If not, please can you provide additional information?

If not, please can you provide additional information?:

N/A not an area of expertise.

32 Do you agree with the assumptions we have made to reach these estimates?

No

33 If not, please can you provide additional information?

If not, please can you provide additional information?:

N/A not an area of expertise.