HARROW MONITORING GROUP

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Extending Awaab's Law to private rented tenancies and residential licences

Harrow Monitoring Group consultation response, submitted by the Group's coordinator Husain Akhtar

13 October 2026 | Response to the Ministry of Housing Communities and Local Government

Executive summary

Harrow Monitoring Group supports extending Awaab's Law to private rented tenancies and to all supported housing, temporary accommodation and care leaver accommodation occupied under licence. Residents' safety should not depend on the legal form of their occupation. We favour common hazard thresholds and core deadlines, with additional safeguards where residents depend on support or face insecure placements.

Our preferred approach retains maximum periods of ten working days to investigate potential significant hazards, five working days after the investigation to make safe, and twenty-four elapsed hours to investigate and make safe emergency hazards. Deadlines must not become routine waiting periods. Where safety work cannot be completed in time, the responsible provider should secure suitable alternative accommodation at its expense, with essential support maintained.

The Harrow examples show why legal rights need accurate information, credible records and effective oversight. Published repair and tenant-satisfaction figures raise concerns about delivery, while outdated Repairs Charter wording risks confusion over statutory deadlines. These indicators do not establish breaches of Awaab's Law. They support a requirement to publish actual compliance evidence and ensure residents can understand and use their rights.

We recommend commencement in 2027 following a defined preparation period, without waiting for the new private rented sector Ombudsman. Government should ensure accessible interim redress, protection against retaliation, implementation support and monitoring of supply and costs. Question 64 draws together our recommendations on Access, Governance, Transparency, Accountability and Assurance, including the need to measure whether homes have actually been made safe.

Scope and approach

This response addresses the consultation published on 9 October 2026, which closes on 18 December 2026. Question headings below summarise the topics; the numbering follows the official consultation. Conditional questions are identified, and provider-only questions are marked not applicable.

Qualitative ratings express HMG's policy assessment and are not statistical estimates. References identify the published evidence used. [1]

Awaab's Law already applies to relevant social housing tenancies from 27 October 2025. Phase 2 is due on 30 November 2026. The present consultation concerns future extension to private rented tenancies and specified licences; this response does not suggest that those proposed deadlines already apply to private tenants. Existing repair, fitness and housing enforcement protections continue to matter. [1–3]

Harrow evidence and its relevance

Harrow's Homelessness and Rough Sleeping Strategy describes approximately 4,800 council-rented homes and a similar number of housing-association homes, giving an approximate borough-wide total of 9,600 social homes. It also describes around 30 per cent of homes as privately rented. These are the strategy's contextual estimates, rather than a fresh stock count. Extending the law is therefore relevant to a substantial part of the borough's housing, and awareness work should reach beyond council tenants. [7]

Harrow's published 2025–26 indicators report 68.7 per cent of non-emergency repairs and 87.7 per cent of emergency repairs completed within target. Satisfaction with the overall repairs service was 59.4 per cent, with listening and acting on tenant views 41.1 per cent, and with complaint handling 17.3 per cent. General repair targets and survey results are not a measure of compliance with Awaab's Law, but they explain the need for statutory deadline reporting and accessible escalation. [5]

The council's Residents' Annual Report 2024–25 reports 14 Housing Ombudsman determinations, 22 maladministration findings and a rounded maladministration rate of 79 per cent, compared with 93 per cent the previous year. These findings relate to complaints escalated to and determined by the Housing Ombudsman; they do not reflect the outcome of all housing repairs carried out by Harrow Council. The report includes an explanation of Awaab's Law and promises more detail in future reports. It does not establish when each tenant first received or understood that information. [6]

The Repairs Charter available during preparation of this response still describes government consultation on Awaab's Law timescales as underway. It also says its internal Priority 2 twenty-four-hour period begins at 9 am the next day if a repair is reported after 3 pm. Internal categories cannot postpone an applicable statutory emergency deadline. This demonstrates the need to distinguish internal service standards from enforceable legal requirements and to update all resident-facing documents together. It does not establish how an individual report was handled. [2,4]

About HMG

Question 1 Respondent capacity

Other: Harrow Monitoring Group, an independent community organisation concerned with inclusion, safeguarding, accountability and value for money. This is an organisational public-interest response drawing on published evidence and our scrutiny of local services; it is not a claim to speak for every tenant or to report a new representative survey.

Question 1A Provider category

Not applicable. HMG is not responding as a landlord or licensor.

Question 1B Accommodation categories

Not applicable. HMG is not an accommodation provider.

Question 1C Portfolio size

Not applicable. HMG does not submit a property portfolio return.

Question 2 Individual location

Not applicable as an organisational respondent. Our local focus is Harrow, London, and the recommendations have wider relevance across England.

Question 3 Property location

Not applicable. HMG is not responding as a landlord or letting agent.

Part 1 Private rented tenancies

Question 4 Hazards covered

Yes. Protection should cover all Housing Health and Safety Rating System hazards except overcrowding. The consequences of unsafe conditions do not become less serious because a household rents privately. Excluding overcrowding from this repair regime must not weaken separate overcrowding, licensing or homelessness protections.

Question 4A Alternative hazard scope

Not applicable because our answer to Question 4 is yes.

Question 5 Tenant breach exclusions

Yes, subject to a tightly defined and evidenced exclusion. A landlord alleging that a tenant's contractual breach wholly or mainly caused the hazard should have to substantiate that allegation. Ordinary occupation, poverty, inability to afford heating, disability or assumptions about cultural practices must not be treated as proof. Disputed causation should not postpone urgent safety assessment or action required under other duties.

Question 6 Leasehold responsibility

Include these hazards, with a legal requirement for the leaseholder landlord to take reasonable steps to secure action from the freeholder. Those steps should include prompt notification, documented escalation, updates to the resident and use of available contractual remedies. The tenant should not have to resolve ownership disputes. Regulations should clarify feasible interim protection and alternative accommodation where the letting landlord cannot lawfully undertake the underlying repair.

Question 7 Hazard thresholds

Use the significant-hazard and emergency-hazard thresholds adopted for social housing. Common thresholds will help residents, contractors and advisers understand the protection and reduce opportunities for inconsistent classification. An internal repair priority should never determine whether the statutory threshold is met.

Question 7A Alternative threshold

Not applicable because we support the social housing thresholds.

Question 8 Occupant circumstances

Assess both the hazard and its effects on actual occupants, including age, health and disability. The same defect can expose different households to different risks. Residents should not have to produce a medical report before obvious danger is recognised, and absent personal information must not be interpreted as absence of vulnerability.

Question 9 Assessment challenges

We regard insufficient information about residents, reluctance to disclose personal information, discrimination and management of sensitive data as major challenges requiring safeguards, rather than reasons to abandon individual assessment. These are qualitative policy judgements, not measured prevalence estimates. Collect only relevant information, explain its use, restrict access and prevent its use to screen out applicants. Allow information to be supplied through an advocate or professional with appropriate authority.

Question 10 Further views on scope

Scope must be understandable to residents who cannot identify a technical hazard category. Reports describing symptoms or conditions should trigger assessment without requiring legal terminology. HMG recommends a national plain-language guide, with examples of significant and emergency hazards and an explanation of how existing housing duties continue alongside Awaab's Law.

Question 11 Investigation deadline

Ten working days as the maximum for completing an investigation, consistent with social housing. Immediate triage should determine whether an emergency response or earlier inspection is necessary. A requirement merely to book an investigation within ten days would be inadequate; guidance and regulations should distinguish arranging an appointment from completing a competent assessment.

Question 12 Inspection competence

Other: a person with demonstrable competence appropriate to the hazard, supported by clear national standards and mandatory specialist referral where necessary. A landlord's own assurance of competence should not be sufficient where a diagnosis is complex or disputed. Initial assessment must not become a second waiting period before the statutory investigation, and residents should be able to request a physical inspection where remote assessment is inadequate.

Question 13 Investigation challenges

We assess investigation costs as a moderate challenge, competent-person availability as a major challenge and disputes over outcomes as a major challenge. These are planning judgements rather than quantified findings. Shared inspection services, recognised training and transparent assessment records would help; independent reassessment should be available where a landlord rejects credible evidence of risk.

Question 14 Written summaries

Yes. A written summary gives the resident a usable record and makes it possible to challenge an incorrect decision. It should be provided in an accessible format, with an explanation in the resident's preferred communication channel where necessary.

Question 15 Summary deadline

Three working days after the investigation concludes. This should be a maximum, with immediate communication of urgent findings and safety advice. Producing or sending the summary must not delay work to make the home safe.

Question 16 Summary content

Require all five proposed information categories: the hazard decision, intended action, reasons for taking no further action, action deadlines and contact details. Also require the assessment date, relevant household circumstances, interim precautions, responsible officer or agent, and routes to challenge the decision. The summary should distinguish making safe from permanent preventive work and avoid unexplained technical language.

Question 17 Further views on investigations

Records should preserve the first awareness date, assessment evidence, decisions, communications and subsequent action. Residents should receive a reference and be able to correct relevant factual errors. Harrow's outdated Repairs Charter wording demonstrates why guidance must be version-controlled and checked against legislation, rather than left beside newer explanations that residents must reconcile themselves. [4]

Question 18 Making safe

Five working days from the conclusion of the investigation, as a maximum. Earlier action is necessary where the assessed risk requires it. Temporary treatment should count as making safe only where there is a defensible assessment that the significant risk has actually been removed.

Question 19 Starting preventive works

Five working days from the investigation concluding to begin supplementary preventive works, or to take the permitted steps towards starting where beginning is genuinely impracticable. The requirement should operate alongside, rather than after, the separate obligation to make safe.

Question 20 Exceptional delay to preventive works

Yes, with safeguards. Twelve weeks should be an outer limit for physically starting works, not a routine allowance. The landlord should document why an earlier start is impracticable, show the steps taken within the initial deadline, keep the resident informed and reassess any interim solution. Booking a contractor must not leave a household exposed to an unresolved significant hazard.

Question 21 Repair delivery challenges

We assess availability of general tradespeople as a moderate challenge and specialist availability as a major challenge. We do not have evidence to rate geographical variation nationally and select don't know for that item. Access is a moderate challenge requiring flexible appointments, interpreters and reasonable adjustments. Contractor management and weak record systems are additional concerns; landlords should plan for foreseeable demand rather than rely on repeated extensions.

Question 22 Separate emergency requirements

Yes. Emergency hazards need a separate accelerated requirement. Residents and reporting staff should have clear examples and a route for immediate escalation where a routine repair classification understates the danger.

Question 23 Emergency deadline

Twenty-four elapsed hours for both investigation and making safe, measured from awareness of the potential emergency hazard. This must include evenings, weekends and bank holidays. It is a maximum rather than permission to wait where immediate action is needed. Harrow's published rule starting its internal Priority 2 period the next morning after a late report illustrates why administrative clocks must be clearly distinguished from statutory deadlines. [4]

Question 24 Emergency response challenges

We assess clarity about emergencies, urgent contractor availability and evening or weekend response as major challenges; access and call-out costs are moderate challenges. Landlords should have an emergency contact and contingency arrangements before letting. A small portfolio does not make an imminent health risk less urgent, although shared services and appropriate insurance can help landlords meet their responsibilities.

Question 25 Alternative accommodation

Strongly support. If the home cannot be made safe within the statutory deadline, suitable alternative accommodation should be secured at the landlord's expense. This must preserve the household's tenancy and account for disability, children, caring responsibilities and access to essential services. A landlord should not be able to transfer the financial consequences of its failure to the resident or council.

Question 26 Benefits of alternative accommodation

We anticipate major positive impacts on health and wellbeing, reduction of serious harm and incentives for preventive maintenance. A further benefit is preventing tenants from having to choose

between remaining in danger and incurring unaffordable accommodation costs. These are expected benefits, not quantified impact estimates.

Question 27 Risks of alternative accommodation

We assess additional landlord costs, availability of suitable accommodation and disruption as major risks requiring mitigation. Rent increases are a potential major risk, although we cannot predict their extent or assume automatic cost pass-through. National arrangements for emergency accommodation, insurance and shared procurement should be explored. Safeguards should prevent unsuitable distant placements and pressure on tenants to surrender their tenancy.

Question 28 Further views on remedial action

The landlord should remain responsible for coordinating the response when agents or contractors are involved. Residents should not have to repeat the same report across organisations. Acceptance or refusal of a proposed move should be recorded without treating refusal as a blanket waiver of repair rights. Safety advice, suitable alternatives and continuing repairs remain essential.

Question 29 Phased implementation

No. Our preferred approach is commencement of the full regime following a defined preparation period, using experience already gained in social housing. If government nevertheless phases implementation, it should publish binding dates for the remaining hazards rather than leave the later stages open-ended.

Question 29A First phase coverage

Not applicable to our preferred answer. If phasing is adopted, significant damp and mould and all emergency hazards must be covered from the first day.

Question 29B Priorities if phased

Not applicable to our preferred answer. As a fallback, prioritise excess cold, excess heat, electrical hazards, fire and explosions, and structural collapse and falling elements for early coverage as significant hazards. This does not diminish the need to cover every emergency hazard from commencement.

Question 30 Commencement year

2027. Publish regulations, guidance, training and communication materials early enough for a practical preparation period. Government should explain any delay by reference to a specific implementation obstacle and its remedy; residents should not face an indefinite wait for enforceable deadlines.

Question 31 Ombudsman timetable

No. Establishing the private rented sector Ombudsman should proceed urgently, but its timetable should not postpone safety protection. There must nevertheless be workable interim access to advice, urgent court remedies and existing local authority housing enforcement. Government should publish a clear redress map so tenants know which route can secure which remedy.

Question 32 Further views on implementation

Require a readiness assessment covering reporting channels, trained staff, contractor arrangements, resident information and emergency contingencies. Local authorities should coordinate borough-wide awareness with landlords, housing associations and community organisations. Harrow's approximately 4,800 council homes and similar number of housing-association homes show why campaigns must reach residents beyond council-owned housing. [7]

Part 2 Accommodation occupied under licence

Question 33 Supported housing coverage

Yes, to all types of supported housing occupied under licence. The need for support strengthens the case for protection. Regulatory definitions should capture the actual accommodation arrangement and avoid exclusion simply because housing and support are supplied through separate organisations.

Question 33A Supported housing exclusions

Not applicable because we support coverage of all types.

Question 34 Supported housing benefits

We anticipate major positive impacts on accommodation quality, health and wellbeing, and a minor positive impact on resident-provider relationships. Better relationships depend on respectful handling of reports, not legislation alone. Reliable repair responses can also support stability and continuity of care.

Question 35 Supported housing challenges

We assess complex needs, staff availability, provider costs and disruption as major challenges. Supply reduction and increased charges are potential major risks requiring evidence and monitoring. Funded contingency planning, coordinated support during moves and accessible reporting would reduce these risks. Residents should not lose necessary support when a housing hazard requires relocation.

Question 36 Supported housing requirements

Apply the social rented tenancy requirements to all supported housing as a common minimum. HMG supports additional operational safeguards for support continuity and communication, rather than weaker deadlines for one funding or ownership model. The conditional responses below clarify our position on each proposed modification.

Question 36A Hazard scope

Requirements should remain the same. Support needs should inform risk assessment and suitable remedies, rather than narrow the hazards covered.

Question 36B Trigger threshold

Requirements should remain the same, with actual occupants' vulnerabilities fully considered. No higher threshold should apply because a resident occupies under licence.

Question 36C Investigation requirements

Requirements should remain the same. Providers should maintain enough knowledge of residents and premises to act sooner where risk warrants it.

Question 36D Written summary requirements

Requirements should remain the same, with accessible explanations and authorised advocates involved where appropriate.

Question 36E Repair requirements

Requirements should remain the same. Specialist support arrangements must be coordinated while repairs proceed, rather than used to justify longer exposure.

Question 36F Emergency requirements

Requirements should remain the same, retaining a separate twenty-four-hour emergency requirement and immediate action where needed.

Question 36G Alternative accommodation requirements

Requirements should remain the same. Suitable alternative accommodation must include arrangements for continuing essential support and care.

Question 37 Further views on supported housing

Commissioning contracts should identify who receives reports, undertakes inspections, organises repairs and protects residents if the accommodation becomes unsafe. Commissioners should test these arrangements through case audits and resident feedback. A licence must not become a mechanism through which responsibility is divided until no organisation accepts it.

Question 38 Temporary accommodation coverage

Yes, to all types of temporary accommodation occupied under licence. Families should not have weaker protection because they are homeless or placed in a hotel, hostel or nightly-paid unit. A short booking should not remove responsibility for a serious hazard.

Question 38A Temporary accommodation categories

Not applicable because we support coverage of all types, including the categories listed in this question.

Question 39 Temporary accommodation benefits

We anticipate major positive impacts on accommodation quality, health and wellbeing, and a minor positive impact on resident-provider relationships. Reduced uncertainty and a reliable reporting route would be particularly valuable for households already facing the disruption of homelessness.

Question 40 Temporary accommodation risks

We regard short-stay effectiveness, fragmented repair responsibility, retaliatory cancellation, supply reduction, additional provider and council costs, and disruption as major risks requiring active design measures. This is a precautionary assessment, not evidence that each outcome will occur. National model contracts, rapid relocation and safeguards against cancellation should accompany implementation.

Question 41 Short stay effectiveness

Effective for both emergency and significant hazards if the regime includes pre-placement checks and a continuing duty to act on reports. For very short stays, repair deadlines alone may not protect the current occupant; immediate suitability assessment and safe relocation are also necessary. Moving one household must not erase the hazard record or permit another to be placed in the same unsafe room.

Question 42 Superior landlord action

Yes. Require all reasonable steps, including enforceable terms, prompt notification, active follow-up and escalation. The licensor should also secure the resident's safety where the superior landlord does not act. Sending one email should not ordinarily constitute a complete response to a persistent serious hazard.

Question 43 Contractual repair arrangements

Mixed. Authorities' bargaining power, contracts and local supply conditions vary. Government should provide model clauses and support for renegotiation, while requiring evidence that new arrangements can deliver the statutory deadlines. HMG cannot verify the adequacy of every authority's existing contracts.

Question 44 Protection against cancelled bookings

Mixed. Contracts can help but may not prevent withdrawal by every provider. Protection should combine contractual restrictions on retaliatory cancellation with monitoring, alternative provision and appropriate enforcement. A cancellation should be investigated and recorded rather than automatically accepted as an unavoidable market response.

Question 45 Contract preparation period

Yes, local authorities should be supported to establish these arrangements within one year and ahead of implementation. This is HMG's recommended preparation standard, not a finding that every authority currently has the capacity. Where genuine barriers remain, government should identify and

resolve them through targeted support rather than grant a general twelve-to-twenty-four-month delay.

Question 46 Supply impacts

We select don't know for the scale of each listed supply impact because HMG has no reliable causal estimates. Withdrawal of unsafe accommodation may improve safety, but replacement capacity is necessary. Monitor whether sound accommodation also leaves, hotel reliance rises or placements become more distant, and publish disaggregated evidence rather than treating every withdrawal as an unavoidable cost of protection.

Question 47 Temporary accommodation requirements

Modify some requirements to account for short stays and fragmented repair responsibility, while retaining social housing protections as the minimum. The modifications should strengthen pre-placement checks, timely information and relocation. They should not make temporary accommodation a lower tier of safety protection.

Question 47A Hazard scope

Requirements should remain the same. Separately enforce existing suitability and overcrowding requirements, which this repair regime should not displace.

Question 47B Trigger threshold

Requirements should remain the same, assessed against the actual household and all relevant vulnerabilities.

Question 47C Investigation requirements

Shorter timescales for investigations: initial physical safety checks before placement wherever practicable and investigation of reported potential significant hazards within five working days at most. Emergency cases retain their faster deadline. These checks must not be used to certify a property indefinitely without responding to new reports.

Question 47D Written summary requirements

Shorter timescales for producing the written summary: one working day after the investigation concludes, alongside immediate communication of any urgent finding. Short stays make delayed information less useful.

Question 47E Repair requirements

Requirements should remain the same as a maximum, with earlier action or relocation whenever safety or the length of the placement requires it.

Question 47F Emergency requirements

Requirements should remain the same, including the separate twenty-four-hour emergency requirement. Very short stays require immediate protective action rather than waiting for the outer limit.

Question 47G Alternative accommodation requirements

Requirements should remain the same. Alternative accommodation must be suitable for the household, preserve relevant homelessness duties and avoid avoidable disruption to schooling, health care and support.

Question 48 Further views on temporary accommodation

Harrow's homelessness strategy acknowledges that emergency accommodation may have to be sourced outside the local area and sets out inspection arrangements. [7] This makes responsibility across borough boundaries a practical issue. The placing authority should retain a named contact and share hazard information with the host authority and provider. Residents must not be told to resolve a jurisdictional dispute before receiving help.

Question 49 Care leaver accommodation coverage

Yes, to all types of care leaver accommodation occupied under licence. Care leavers should have clear protection across supported lodgings, transitional arrangements and emergency placements. Interface guidance should prevent gaps between housing obligations and other safeguarding or regulatory responsibilities.

Question 49A Care leaver accommodation categories

Not applicable because we support coverage of all types listed, subject to precise legal definitions and coordination with any specialist regime already governing the setting.

Question 50 Care leaver accommodation benefits

We anticipate major positive impacts on accommodation quality, health, wellbeing and reduced likelihood of leaving unsafe or unsatisfactory accommodation. Improved relationships with providers are a minor positive impact dependent on implementation. Stable, safe housing can support education, employment and the transition to independent living.

Question 51 Care leaver accommodation challenges

We regard provider costs and disruption as major challenges, with supply reduction and rent increases as potential major risks requiring evidence and mitigation. An additional major concern is the young person being left to challenge a provider without independent support. Commissioning and corporate parenting arrangements should provide advocacy, contingency accommodation and protection from retaliatory moves.

Question 52 Care leaver accommodation requirements

Apply the social rented tenancy requirements to all care leaver accommodation as a common minimum. Personal advisers and relevant commissioners should assist with reporting and follow-through, with the young person's involvement and appropriate information-sharing safeguards. The responses below reject weaker substantive protection.

Question 52A Hazard scope

Requirements should remain the same. Care leavers should not receive a narrower set of hazard protections.

Question 52B Trigger threshold

Requirements should remain the same, with an assessment of the young person's actual circumstances and relevant vulnerabilities.

Question 52C Investigation requirements

Requirements should remain the same, alongside pre-placement safety checks and earlier investigation where circumstances warrant it.

Question 52D Written summary requirements

Requirements should remain the same, with a clear explanation and independent support to understand or challenge the findings.

Question 52E Repair requirements

Requirements should remain the same. The responsible authority should track progress rather than assume that a contractor referral has resolved the hazard.

Question 52F Emergency requirements

Requirements should remain the same, including the separate twenty-four-hour emergency protection and a working out-of-hours contact.

Question 52G Alternative accommodation requirements

Requirements should remain the same. Alternative accommodation should preserve support, education and personal connections and must not amount to an unplanned withdrawal of the placement.

Question 53 Further views on care leaver accommodation

Corporate parenting should include verification that care leavers understand their housing rights and can obtain assistance without fear of losing accommodation. Housing, children's services and providers should maintain a shared escalation protocol and review unresolved hazards. Young people's accounts of unsafe conditions should be considered evidence requiring assessment, rather than dismissed because they lack technical knowledge.

Question 54 Other residential licences

Yes. Government should examine comparable residential licence arrangements where occupants use the accommodation as their home and have limited control over repairs. Any exclusions need a clear safety rationale and an assessment of whether an equivalent enforceable protection exists.

Question 54A Additional settings

Consider residential asylum accommodation, domestic-abuse refuges not already captured by the proposed definitions, and residential accommodation supplied with employment. Residents may face dependence on providers or barriers to complaining. These are recommendations for legal and policy assessment, not claims that the current enabling powers cover every setting. Distinguish residential occupation from ordinary holiday or commercial visitor use.

Part 3 Costs and impacts

Question 55 Provider significant hazard performance

Not applicable. This question seeks operational evidence from landlords, licensors and agents. HMG does not hold a property-management dataset and does not substitute Harrow's general repairs indicators for evidence of statutory compliance.

Question 55A Provider significant hazard timescale

Not applicable. HMG has no provider-specific investigation and repair timescale return.

Question 56 Provider emergency hazard performance

Not applicable. HMG is not a landlord, licensor or agent and cannot provide an operational emergency-hazard return.

Question 56A Provider emergency timescale

Not applicable. HMG has no property-management timescale dataset.

Question 57 Landlord repair arrangements

Not applicable. HMG does not commission repairs for a rental portfolio.

Question 58 Agent repair arrangements

Not applicable. HMG is not a managing agent.

Question 59 Provider cost estimates

Not applicable as a provider cost return. We address public-interest costs and benefits in Question 64 without inventing expenditure estimates.

Question 60 Existing alternative accommodation provision

Not applicable. HMG does not offer accommodation as a landlord or licensor; our policy position is set out in Questions 25 and 64.

Question 61 Temporary accommodation licence proportion

Not applicable. HMG does not provide temporary accommodation and has no verified portfolio proportion to report.

Question 62 Supported housing licence proportion

Not applicable. HMG does not provide supported housing and has no verified portfolio proportion to report.

Question 63 Care leaver accommodation licence proportion

Not applicable. HMG does not provide care leaver accommodation and has no verified portfolio proportion to report.

Question 64 Overall costs impacts and HMG conclusions

HMG supports extending Awaab's Law because the public cost of unsafe housing includes preventable illness, disruption to education and employment, care needs, homelessness, complaints and litigation. Evaluation must distinguish the cost of meeting existing repair duties from additional costs attributable specifically to statutory deadlines, record-keeping and alternative accommodation. It should also recognise savings from timely preventive work, while avoiding unsupported claims about their size.

The Harrow evidence illustrates the importance of delivery and trust. Its published repair and tenant-satisfaction indicators show why residents need a route to challenge delay, while the outdated Repairs Charter wording illustrates how information can fall behind enforceable rights. These are grounds for stronger scrutiny and communication, not proof that every repair failed or that the council breached Awaab's Law in a particular case. [4–6]

Government should fund implementation support proportionate to need, including environmental-health capacity, competent inspection, independent advice and emergency accommodation arrangements. Local authority housing enforcement and contractual enforcement of Awaab's Law serve different functions. The proposed reliance on court action will not offer an equal remedy unless people with low incomes, limited English, disability or insecure accommodation can obtain timely assistance. Redress for licensees must be settled before commencement, with urgent safety help available without waiting for a lengthy complaint process. [1]

Protection against retaliation is particularly important where a provider can end a licence or booking. Residents should not be made homeless for reporting danger. Commissioning bodies should maintain contingency capacity, monitor cancellations following complaints and verify that households are safely rehoused. Government should track rents, supply, provider withdrawals and out-of-area placements, distinguishing observed changes from changes demonstrably caused by the policy.

Every borough should have a visible awareness programme reaching council, housing-association and private tenants and people occupying under licence. Landlords remain responsible for their own obligations; local coordination should explain who repairs the home, who can investigate dangerous conditions and where independent redress is available. Information should be available through letters, telephone and face-to-face channels as well as online, with translation and accessible formats where needed. Public reporting should measure reach and understanding, not merely count website visits.

Accountability requires named operational and senior responsibility, clear political or governing-body oversight, auditable awareness dates, recorded risk assessments and evidence that safety work was effective. Published performance should identify the number of relevant cases, deadline compliance, exceptions, repeat hazards and alternative accommodation outcomes. Independent sampling and resident feedback should test whether recorded completion corresponds to a home made safe.

The consultation's detailed structure is useful for providers, but lengthy technical questions and commercial cost returns can discourage participation by residents and community organisations. A short accessible companion version, supported participation and outreach through trusted organisations would improve the evidence. Analysis should preserve qualified support and minority concerns rather than reduce them to a simple count of agreement.

Our central recommendation is a common, enforceable safety floor across tenancies and the proposed residential licences, supported by clear information, competent assessment, realistic delivery arrangements and usable redress. Harrow's experience reinforces the national lesson: publishing a legal protection is only the beginning. Residents must be able to recognise a hazard, report it, obtain prompt action and have confidence that someone independently checks the outcome.

References

Sources checked on 13 October 2026. Page references use the page numbers printed in the documents. Local figures are attributed to the relevant published source and retain its reporting period.

1 MHCLG. Extending Awaab's Law to private rented tenancies and to licences.
https://www.gov.uk/government/consultations/extending-awaabs-law-to-private-rented-tenancies-and-to-licences/extending-awaabs-law-to-private-rented-tenancies-and-to-licences

2 MHCLG. Awaab's Law guidance for social landlords.
https://www.gov.uk/government/publications/awaabs-law-guidance-for-social-landlords/awaabs-law-guidance-for-social-landlords-timeframes-for-repairs-in-the-social-rented-sector

3 MHCLG. Awaab's Law Phase 2 guidance for social housing landlords.
https://www.gov.uk/government/publications/awaabs-law-phase-2-guidance-for-social-housing-landlords

4 London Borough of Harrow. Repairs Charter pages 15 and 18.
https://www.harrow.gov.uk/repairscharter

5 London Borough of Harrow. Performance and Regulation 2025 to 2026 indicators.
https://www.harrow.gov.uk/housing-property/performance-regulation

6 London Borough of Harrow. Residents' Annual Report 2024 to 2025 pages 7 and 12.
https://www.harrow.gov.uk/downloads/file/33517/residents-annual-report-2024-25

7 London Borough of Harrow. Homelessness and Rough Sleeping Strategy 2025 to 2030 pages 3 and 28 to 30.
https://www.harrow.gov.uk/downloads/file/26994/harrow-council-homelessness-and-rough-sleeping-strategy-2025-30