

Hazards, Damp and Mould Policy

Document Owner	Head of Property and Building Safety
Prepared by	Head of Property and Building Safety
Approved by	Board
Approved date	September 2026
Date of next review	September 2029
Monitoring, Auditing and Reporting	1. Regular KPI reporting to Board 2. Reviewed via Hexagon's internal audit programme

Version	Date	Updates
1	Aug 2023	Damp and Mould Policy introduced
2	Sept 2026	Complete revision to consider new legal framework and timescales.

1. Scope and Aims

1.1. In October 2025, the Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 came into force. These Regulations are commonly known as Awaab's Law, introduced following the death of two-year-old Awaab Ishak, who died as a result of prolonged exposure to damp and mould in his home.

1.2. Awaab's Law introduces legally prescribed requirements and timescales (implied terms in relevant social housing tenancies) requiring social landlords to:

- Investigate notified hazards, and
- Make emergency and significant hazards safe within legally prescribed timeframes.

1.3. This Policy applies where we are notified of, or otherwise become aware of, a hazard on or after 27 October 2025.

1.4. This does not prevent hazards identified before this date from being managed in line with the principles, protections, and timescales set out in this policy where reasonably practicable.

1.5. This Policy applies to:

- Damp and mould; and
- Emergency hazards.

1.6. A hazard is anything with the potential to cause harm, damage, or adverse health effects.

1.7. Awaab's Law initially covers damp and mould, and emergency hazards. In October 2026, the legal requirements will expand to include the following hazards where they present a significant risk of harm:

- Excess cold
- Excess heat
- Falls associated with baths etc. on level surfaces, on stairs, and between levels
- Structural collapse
- Fire
- Electrical
- Explosions
- Domestic and personal hygiene and food safety.

- 1.8. In October 2027, the requirements will expand again to include all the remaining hazards (excluding overcrowding) listed in the Housing Health and Safety Rating System (HHSRS). This includes emergency hazards in Higher-Risk Buildings as defined in the Building (Higher-Risk Buildings Procedures) (England) Regulations 2023.
- 1.9. This Policy applies to all homes, buildings, land, and communal areas for which we are responsible under tenancy agreements, including temporary and supported accommodation. This includes communal areas if we're responsible for repairs.
- 1.10. It does not apply to:
- Leasehold homes.
 - Owner-occupied or shared ownership homes.
 - Homes occupied solely under licence (unless otherwise required by law).
- 1.11. While Awaab's Law and the statutory requirements reflected in this policy do not directly apply to leaseholders or homeowners, Hexagon will apply the same risk based, health led principles when responding to reports of damp and mould in those properties. Reports will not be dismissed without appropriate investigation. In each case, Hexagon will review the relevant lease to determine responsibilities and ensure that any response is fair, proportionate, and informed by the circumstances of the property and household.
- 1.12. Even where Awaab's Law does not apply (for example, in leasehold, shared ownership, or licence-only occupation), this does not remove Hexagon's wider legal, contractual, and regulatory responsibilities. Where we have responsibility for the defect or the relevant building element (including communal areas), or where our works, installations, or repairs have contributed to a leak, inadequate ventilation, damp, mould, or any other hazard, we will investigate, take proportionate action to make safe, and complete remedial works as promptly as reasonably practicable in line with applicable legislation, our repairing obligations, and regulatory standards.
- 1.13. Where hazards occur in properties or areas not owned or directly controlled by us (e.g. managing agents or neighbouring properties), we will take all reasonable steps to work with responsible parties to resolve the hazard as swiftly as reasonably practicable.
- 1.14. Where the defect is within our responsibility and it's affecting neighbouring properties for which we're not responsible, we may need to fix these hazards even if they're not in the scope of Awaab's Law. For example, if a burst pipe

within one of our homes is leaking and causing a hazard in a neighbouring private residence.

- 1.15. Hexagon will comply with all statutory requirements relating to damp, mould and housing hazards, including the requirements of Awaab's Law. We will investigate, assess and remedy hazards within the prescribed timescales and maintain clear records demonstrating compliance.
- 1.16. This policy supports Hexagon's quality management system by ensuring statutory compliance, service consistency, and continual improvement in the management of housing hazards.

2. Policy Statement

- 2.1. We recognise that damp, mould, and other hazards cause real harm, including to physical health, mental wellbeing, educational outcomes, and safety.
- 2.2. Our approach will always be:
 - Resident-focused
 - Non-judgemental
 - Empathetic
 - Solution-led
- 2.3. We will not place sole or unreasonable responsibility on residents for hazards arising in their homes, particularly where factors such as fuel poverty, overcrowding, building design, or ventilation limitations contribute.
- 2.4. Where health risks are identified, protecting life and wellbeing overrides convenience, cost, or programme considerations.
- 2.5. Hexagon will adopt a proactive approach to identifying and preventing damp, mould and other housing hazards through stock condition information, property inspections, resident reports, learning from complaints and risk-based monitoring of homes.
- 2.6. Hexagon will promote the benefits of the Complaints process and the Housing Ombudsman to residents as an appropriate and effective route to resolving disputes. Hexagon will continue to take action to resolve the damp and mould issue when a complaint is raised, without waiting for the complaints procedure to be completed, to ensure that raising a complaint does not cause delays to repair.
- 2.7. Where a resident is pursuing a disrepair claim in relation to a damp and mould issue in their home, Hexagon will continue to attempt to resolve the repair until or unless legally required to cease repair works.

3. Identifying Hazards

3.1. We will actively identify hazards through:

- Resident reports (or on their behalf).
- Notifications from third parties (e.g. GPs, local authorities).
- Repairs, voids, and safety inspections.
- Stock condition surveys.
- Estate and home visits.
- Observations during other repair works.

3.2. All staff and contractors have a responsibility to identify, report, and escalate hazards immediately.

4. Assessing Hazards

4.1. When a potential hazard is identified, we will take all reasonable steps to establish:

- The nature and location of the hazard.
- Whether it falls within our responsibility.
- Who is, or may be, at risk.
- Whether household vulnerabilities exist and whether these increase risk.

4.2. We will assess hazards using our Hazard Impact Guidance, informed by HHSRS and Awaab's Law requirements.

5. Hazards Definitions and Legal Timescales

5.1. All staff and contractors involved in repairs and inspections must act in accordance with this policy and related procedures.

5.2. Emergency Hazards

5.3. An emergency hazard is one that:

- Poses an imminent and significant risk to health or safety; and
- Requires immediate action.

5.4. Legal duty:

- We will investigate potential emergency hazards as soon as reasonably practicable and within 24 hours and, where confirmed, complete relevant safety works as soon as reasonably practicable and within 24 hours of becoming aware.

5.5. Household vulnerabilities may escalate otherwise non-emergency hazards into emergency hazards.

5.6. **Significant Hazard**

5.7. A significant hazard is one that:

- Poses a serious risk to health or safety; and
- Requires urgent investigation and remediation.

5.8. Legal duties:

- Investigate any potential significant hazards within **10 working days** of awareness.
- Produce a written summary of investigation findings and provide this to the named tenant within **3 working days** of the conclusion of the investigation.
- If the investigation identifies a significant hazard, we will complete relevant safety work **within 5 working days** of completing the investigation.

5.9. **Supplementary Preventative Works**

5.10. We will aim to begin, or take steps to begin, any required supplementary preventative works to prevent a significant or emergency hazard recurring within **5 working days of completing the investigation**. In circumstances where it is not reasonably practicable to begin further work within 5 working days, we must ensure we begin works as soon as reasonably practicable and work must be physically started **within 12 weeks**.

5.11. **Alternative Accommodation**

5.12. We will offer residents suitable alternative accommodation for the household if relevant safety work cannot be completed within the specified timeframes set out in this policy; in line with our Alternative Accommodation Policy.

5.13. **Vulnerability Based Escalation**

5.14. Where vulnerabilities are present, we may need to escalate priorities, including escalation from:

- Minor → Significant
- Significant → Emergency

5.15. Vulnerabilities include (but are not limited to):

- Children under five.
- Pregnant residents.
- Older residents.
- Respiratory, cardiovascular, immune-compromised, or skin conditions.
- Physical or sensory disabilities.

5.16. Where household vulnerabilities are identified, the case must be reviewed for escalation. Where the vulnerability increases the likelihood or severity of harm, the case will be escalated accordingly.

6. Damp and Mould – Enhanced Protections

6.1. Given the origin of Awaab's Law, damp and mould cases will receive heightened scrutiny.

6.2. All damp and mould reports will trigger:

- A property inspection (specialist or surveyor),
- Identification of root cause (e.g. penetrative, rising, condensation),
- Immediate mitigation actions where risk is identified.

6.3. We will avoid approaches that:

- Delay action pending lifestyle advice.
- Blame resident behaviour.

6.4. Advice will be supportive and supplementary, not a substitute for remedial works.

6.5. Where mould presents a health risk, we will act as either a significant or emergency hazard, regardless of traditional repairs categorisation.

7. Communication and Resident Assurance

7.1. We will:

7.1.1. Keep residents informed at every stage.

7.1.2. Provide clear explanations of findings, actions, and timescales.

7.1.3. Communicate with residents at least every 2 weeks until the issue is fully resolved.

7.2. Following the conclusion of any investigation under this policy, including a standard, emergency, renewed or further investigation, we will provide the resident with a written summary within three working days.

7.3. The written summary will include:

- whether the investigation identified a significant hazard, emergency hazard, or no hazard requiring action under Awaab's Law;
- the findings of the investigation;
- the identified risks;
- the reasons for the decision reached;
- any actions already taken;
- any further actions required;
- target timeframes for beginning and completing those actions;
- any interim safety measures;
- any further or specialist investigations required;
- any supplementary preventative works required;
- any alternative accommodation requirement;
- relevant safety advice; and
- Hexagon's contact details.

7.4. Where no action is required under Awaab's Law, the written summary will explain the reasons for that decision.

7.5. Where more than one investigation is required for the same issue, we will usually provide a written summary after each investigation.

7.6. Where delays occur, we will:

- Explain the reasons in writing;
- Set out mitigation measures;
- Confirm any alternative accommodation arrangements, where required; and,
- Escalate internally for management oversight.

8. Renewed and Further Investigations

8.1. Where an initial investigation is completed remotely, using information provided by the resident, photographs, video, telephone assessment, repair records, stock condition data or other available information, and the resident requests an in-person inspection, we will carry out a renewed in-person investigation.

8.2. A renewed investigation will be completed in line with the applicable Awaab's Law timescale. Where the renewed investigation relates to a potential significant hazard, it will be completed within 10 working days of the resident's request. Where the information available indicates a potential emergency hazard, we will treat the matter as an emergency and investigate within 24 hours.

8.3. Where an investigation identifies that further or specialist investigation is required to determine the cause, extent, risk level or appropriate remedial solution, this will be arranged as promptly as reasonably practicable. This may

include, for example, specialist surveys, drainage inspections, structural assessments, ventilation assessments, intrusive investigations, or other technical inspections.

- 8.4. The need for a further investigation will not delay any relevant safety works, interim mitigation, safeguarding action, or alternative accommodation required to protect the resident's health and safety.
- 8.5. Where a further investigation is required, we will explain this to the resident in writing, including why the further investigation is needed, what it will involve, the expected timescale, any interim safety measures, and any works or support that will be provided while the further investigation is outstanding.
- 8.6. Following the conclusion of a renewed or further investigation, we will provide the resident with a written summary within three working days, in line with section 7 of this policy.

9. Timeframe Exceptions and Oversight

- 9.1. Relevant safety works required to make a property safe must be completed within the applicable Awaab's Law timeframe, unless Hexagon is prevented from doing so despite taking all reasonable steps.
- 9.2. Where relevant safety works cannot be completed within the required timeframe, the case must be escalated for senior management oversight, interim controls must be documented, and suitable alternative accommodation must be offered where the property cannot be made safe within the required period.
- 9.3. Where supplementary preventative works cannot begin within five working days, senior management escalation is required. The reasons must be documented, interim controls must be recorded, the resident must be updated regularly, and the works must physically start as soon as reasonably practicable and within 12 weeks.
- 9.4. Any failure to meet statutory or policy timescales will be treated as a compliance exception. The exception will be recorded, reviewed, and subject to corrective action to address the immediate issue and prevent recurrence.

10. Access

- 10.1. Residents must provide access to allow us to investigate and rectify hazards.
- 10.2. We will make all reasonable efforts to secure access, including flexible appointments, before using formal access powers under our No Access Policy.

11. Monitoring, Governance and Assurance

11.1. **Accountability and remedial action**

11.2. Overall accountability for compliance with this policy and the requirements of Awaab's Law sits with the Director of Operations.

11.3. Risk based prioritisation is applied to ensure resources are directed to areas of greatest risk to health and safety.

11.4. Compliance with statutory timescales and policy requirements will be monitored through established performance and governance arrangements. Where monitoring identifies non-compliance, this will be escalated for senior management oversight, and appropriate corrective actions will be agreed, implemented, and monitored through existing assurance and reporting mechanisms to address the immediate issue and prevent recurrence.

11.5. We will:

- Monitor compliance monthly at Executive level,
- Report performance quarterly to the Board,
- Track completion against Awaab's Law timescales.

11.6. We will:

- Review complaints, missed appointments, and outcomes.
- Undertake regular quality assurance audits.
- Use learning to drive continuous improvement.

11.7. The Hazards, Damp and Mould Policy is aligned with ISO 9001:2015 principles, demonstrating clear leadership accountability, risk-based planning, controlled operational processes, performance monitoring, and continual improvement through established governance and assurance arrangements.

11.8. Damp and mould cases will be managed in line with the organisation's Disrepair, Damp and Mould Resolution Policy, which adopts an Alternative Dispute Resolution (ADR)-led approach. Complaints and escalation routes are used as formal dispute resolution mechanisms and do not delay investigation, remedial works, or hazard mitigation.

11.9. Raising a complaint, legal correspondence, or external escalation will not delay inspection, investigation, remedial works, or safeguarding actions. Repairs and hazard mitigation will continue while any dispute is being resolved.

11.10. Where residents are dissatisfied with our response, we will engage constructively through our complaints process and, where appropriate, with independent bodies such as the Housing Ombudsman. Hexagon recognise the Housing Ombudsman as an independent dispute-resolution body and will

cooperate fully with investigations and implement any orders or recommendations promptly.

11.11. Learning from complaints, repeat damp and mould cases, and external findings will be used to improve services, prevent recurrence, and strengthen our approach to managing health-related hazards in the home.

11.12. This policy supports a health-led, resident-focused approach to damp and mould management. By aligning with the organisation's ADR-Led Disrepair Policy, it ensures that disputes and complaints do not delay action, that residents are treated fairly, and that continuous improvement is embedded in line with regulatory expectations and ISO 9001:2015 principles.

12. Related Hexagon policies, strategies, and procedures

- Complaints Policy and Procedure
- Mutual Exchange Policy
- Compensation policy
- No Access Policy
- Repairs Priority Policy
- Alternative Accommodation Policy
- Hazard Impact Guidance
- Tenancy Management Policy

13. Related Guidance and Legislation

- Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025
- Housing Health and Safety Rating System (England) Regulations 2005
- Building (Higher-Risk Buildings Procedures) (England) Regulations 2023.
- Regulator of Social Housing Consumer Standards
- Social Housing (Regulation) Act 2023
- Equality Act 2010
- Landlord and Tenant Act 1985
- Housing Ombudsman Damp and Mould Spotlight Report 2021
- Housing Ombudsman Complaint Handling Code
- The Homes (Fitness for Human Habitation) Act 2018
- Housing Act 2004
- Decent Homes Standard 2006
- Building Act 1984
- Regulator of Social Housing Home Standard
- Building Regulations 2010 and Ventilation: Approved Document F

14. Consultation

- 14.1. The Hexagon Resident Advisory Group, the Hexagon Resident Repairs Group, and the Hexagon Resident Disability Inclusion Group were consulted on a previous version of this policy in March 2023.
- 14.2. Resident feedback highlighted concerns that Hexagon does not currently hold sufficient data on resident vulnerabilities. Hexagon is undertaking a Resident Profiling programme to improve the accuracy and completeness of the data we hold on our residents.
- 14.3. In cases of damp and mould, when a resident reports an issue, Hexagon will ask whether they meet the vulnerability criteria set out in this policy. This will ensure we capture relevant information for each reported case, enabling appropriate prioritisation, support, and reasonable adjustments and supporting compliance with the Equality Act 2010.

Appendix 1: Equality Impact Assessment

Hexagon's Vulnerable Residents and Reasonable Adjustments Policy commit the organisation to understanding the diverse needs of residents and, where there are any barriers to accessing the service or any disproportionate negative impact, considering reasonable adjustments to ensure a fair and equitable outcome for all residents.

Characteristic	Impact	Explanation of Impact	Reasonable Adjustments Considered	Consideration of effectiveness, practicality, cost/availability of resources and any disruption to service	Decision on whether to implement the Reasonable Adjustment
Age	Positive	Potential positive impact, subject to effective identification of age-related vulnerability, including older residents and households with children under five.	Prioritisation where age increases risk; flexible appointments; clear communication with carers, advocates or representatives where authorised; consideration of alternative accommodation where the household cannot safely remain in the home.	Adjustments are practical and proportionate and can be accommodated within business-as-usual processes; prioritisation/escalation supports safety and equitable outcomes.	Implement where required on a case-by-case basis in line with the Vulnerable Residents and Reasonable Adjustments Policy.
Pregnancy/ Maternity	Positive	Potential positive impact, subject to effective identification of pregnancy or maternity-related vulnerability where damp, mould, cold, heat, access issues or other hazards may increase risk.	Prioritisation where pregnancy increases risk	N/A.	N/A.

Disability: Physical health and mobility	Positive	Potential positive impact, subject to effective identification of vulnerability and reasonable adjustment needs.	Offer flexible appointments and communication methods; capture vulnerability criteria at first contact; consider support with access/decant where required.	Adjustments are practical and proportionate and can be accommodated within business-as-usual processes; prioritisation/escalation supports safety and equitable outcomes.	Implement where required on a case-by-case basis in line with the Vulnerable Residents and Reasonable Adjustments Policy.
Disability: Learning and neurodiversity	Positive	Potential positive impact, subject to effective identification of vulnerability and reasonable adjustment needs.	Provide information in plain language; confirm understanding; offer verbal updates; allow advocate/representative involvement; offer appointment reminders.	These adjustments are low cost, practical, and reduce the risk of missed appointments and misunderstanding of advice/actions.	Implement where required on a case-by-case basis.
Disability: Vision and hearing	Positive	Potential positive impact, subject to effective identification of vulnerability and reasonable adjustment needs.	Offer alternative formats and channels (e.g. verbal updates, text); allow a representative to liaise; confirm appointments and outcomes in the resident's preferred method.	Practical and low cost; improves accessibility and reduces risk of residents missing key information.	Implement where required on a case-by-case basis.
Disability: Mental health	Positive	Potential positive impact, subject to effective identification of vulnerability and reasonable adjustment needs.	Provide clear, reassuring communication; offer a consistent point of contact where possible; schedule appointments with notice; consider support referrals where appropriate.	Practical and proportionate; helps ensure residents can engage with the process and reduces risk of complaints/escalation.	Implement where required on a case-by-case basis.
Sex	Monitoring Required	Monitoring required. Current reporting data indicates a higher proportion of reports from women than men. Further analysis is	Monitor reporting patterns and outcomes by sex where data is available; ensure proactive identification and	Monitoring is practical within existing performance reporting. Any process changes would be considered at review if a	Monitor and reassess at next policy review.

		required to understand whether this reflects household composition, reporting behaviour, caring responsibilities, time spent in the home, vulnerability, or differential service outcomes.	consistent responses to all reports.	disproportionality is confirmed.	
Gender reassignment / Transgender / Non-binary identity	None	No impact identified.	None identified at this stage.	N/A.	N/A.
Race or nationality	None	No issues currently identified.	Ensure residents can access information and report issues via preferred channels; signpost interpretation support if required.	Practical within existing communications arrangements.	Implement where required on a case-by-case basis.
Religion or belief	None	No impact identified.	None identified at this stage.	N/A.	N/A.
Sexual orientation	None	No impact identified.	None identified at this stage.	N/A.	N/A.
Socio-economic status	Positive	Damp and mould is likely to disproportionately impact residents experiencing fuel	Adopt a holistic approach to damp and mould cases, including signposting/referrals for financial inclusion, energy	Referrals are practical and support residents to sustain a healthy home environment alongside	Implement referrals/support on a case-by-case basis where need is identified.

		poverty, where heating and ventilation may be constrained.	advice and support via the Community Investment Team where appropriate.	remedial works, reducing risk of recurrence.	
Language	Positive	Potential positive impact, subject to effective identification of communication needs and provision of interpretation, verbal explanations or translated information where required..	Information can be provided verbally at the resident's request; consider interpretation support where needed.	Practical within existing communications arrangements.	Implement where required on a case-by-case basis.
Literacy	Positive	All information about the damp and mould policy, appointment times and survey results can be provided verbally at the resident's request.	Offer verbal explanations; use plain language; confirm understanding; offer follow-up call if needed.	Low cost and practical; supports equitable access and reduce the risk of missed appointments or misunderstanding.	Implement where requested/required.
Where any negative impact is identified, have changes to the policy or sufficient reasonable adjustments been proposed to mitigate the impact?					
No negative impact identified					
How will the reasonable adjustments be facilitated and communicated to residents?					
Implement where required on a case-by-case basis in line with the Vulnerable Residents and Reasonable Adjustments Policy.					
Are you satisfied that we have met our duties under the Equality Act 2010 and the Consumer Regulations?	☒ Yes		Name and Job Role:	Lysa Nicely, Head of Property and Building Safety	