Data challenges implementing Awaab's Law: Emerging insights and hypotheses

June 2025

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What this pack contains

This pack contains a set of early insights and hypotheses about data challenges housing providers face preparing for Awaab's Law.

The challenges are grouped under three headings, relating to efficiency, readiness and effectiveness.

There is also a further category of early insights that were not validated when taken to a roundtable of housing providers in June 2025.

In the appendix, you will find a helpful summary of different types of data standards developed by the Open Data Institute. Many slides are tagged with the relevant standards types based on this diagram.

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Challenges relating to efficiency

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Councils respond to regulations individually

When new regulations are introduced for social housing, each council and provider responds individually to implement the required changes to data and process. This is an inefficiency. This could mean:

- Time spent interpreting the policy and associated guidance
- Additional cost of change requests to systems
- Lessons learned are not always shared across the sector

A housing provider said: "With the Tenant Satisfaction Measures (TSMs) there were no standard definitions. We burnt a lot of time across Housing Associations interpreting this."

Hypothesis: If councils are provided with a data standard and common service patterns to follow, these inefficiencies could be reduced

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Councils are paying for software change requests individually because each has bespoke data

A council said:

"We've made changes to our housing system to accommodate the new processes required to better track our customer journey. We've developed a damp & mould dashboard which improves visibility of performance across the service."

Hypothesis : If councils could pay as a collective for one change across the sector then it would reduce cost for all

6- Ongoing operations are simplified through standard taxonomies like Schedule of Rates

Councils use a standard proprietary codelist called Schedule of Rates,to manage standard repair requests with contractors. A code defines what work needs to be done at a standard rate.

One organisation decided they needed to create a new code for an activity not currently covered in the standards for Awaab's Law. This could create problems down the line if, for example, they wanted to integrate other software or processes reliant on the standard Schedule of Rates code, particularly if new hazards added to the regulations require new codes. A software provider previously told us this delayed scaling their innovative product.

Hypothesis: leaning on managed processes around standards and codelists by requesting changes through a central body ensures efficiency and scalability

Challenges relating to readiness

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Housing providers have struggled with previous regulation, needing more help to prepare their record keeping

A civil servant in the MHCLG Social Housing team working with the Regulator of Social Housing, advised there was a high failure rate (circa 40%) of councils meeting the new Tenant Satisfaction Measures (TSMs) regulations - councils were not prepared and data was problematic. Record keeping was often cited by the regulator as an issue.

Hypothesis: more investment in good data design, standard processes and guidance and better software support will help the sector and ensure the regulations can be complied with.

Housing providers may be putting off making changes to systems awaiting guidance

Some housing providers may be holding off commissioning changes to their software while they await the full implementation guidance to comply with Awaab's Law.

One council told us: "We are viewing updates but I suspect we are reliant on clarity being provided through regulation implementation guidance, including practical end-to-end example solutions to meet regulations."

Hypothesis: more time is needed for housing providers to prepare their data and software between the publication of policy guidance and the regulations coming into force

Housing providers struggle with the long lead time needed for software changes

Councils say that it takes software suppliers a long time to implement changes they request in response to the new regulations. This has raised concerns about readiness for some.

One council told us: "We don't have a significant cost implication for change requests, our challenge is around the length of time suppliers take to respond/deliver."

Hypothesis: a data standard and common patterns developed centrally with software suppliers could reduce the lead time for councils to put in place the adaptations they need to comply with the new regulations

The burden of new regulations and policy change impact on data and technology readiness

Councils express concerns about adapting to the new regulations in the context of other policies being introduced. For example, devolution may be leading some to hold off on commissioning software changes or introducing longer term solutions for meeting Awaab's Law regulations.

One council said: Our software for data collection is old and out of date, so constantly trying to repair it and fix it. Devolution means there is less impetus for big changes. Anything we do is a sticking plaster fix. Really struggling for accurate reporting. Bringing in new changes for the new law is really challenging.

Hypothesis: a data standard developed with suppliers could reduce the burden that councils face preparing, whilst also allaying fears over the devolution schedule

Challenges relating to effectiveness

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Data transfer   Identifiers

Connecting data on vulnerabilities with properties is challenging

These data are often held in different teams, different services in Local Authorities or by entirely different bodies (eg. NHS services).

A council said: "Connecting data on housing stock, repair history, vulnerabilities, and health data, that is stored in different sources is complex. For example, NHS data, ONS data, and supplier data. Connecting data without a unique person or property identifier can be challenging."

Hypothesis: Using data standards (eg. SAVVI or the PRSB Core Information Standard) could help housing providers gather critical vulnerability data on tenants. API standards could help ensure interoperability between systems holding this data

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It's something a lot of housing providers mention to me: it's hard for housing staff to know the full breadth of factors that could make residents vulnerable to hazards, as they aren't health professionals. Any health data stored needs to be in compliance with GDPR, updated when circumstances change (which is hard for the landlord to know). Lots of challenges here.

Stakeholder from a representative body for the housing sector

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Without data modelling skills, councils risk creating cumbersome data schemas that are hard to maintain and complex to query

A council told us they struggle with data quality and structure. For example, their data contained attributes from different domains assigned to single entities revealing poor "separation of concerns". A lack of modularity in data models can mean you have to use complex query logic to answer core questions on compliance.

One council said: 'There are only 1 or 2 people in the organisation who have the knowledge to interrogate our data system, they are overloaded already so there is limited capacity for new systems changes/ reporting.'

Hypothesis: A data standard can provide a coherent, modular structure for data that councils and software suppliers can use to avoid complexity and confusion.

Responding to new regulation with workarounds can lead to entity duplication

One organisation told us they had begun to use a new data entity through their Compliance Manager software, called "Hazard Case". This would allow a tenant or housing officer to raise a case for investigation, assign an urgency status and manage to completion.

However this "Hazard Case" record created a duplicate of the "Hazard Component" captured by surveyors, with the two having to be reconciled manually by staff.

Hypothesis: Duplication of overlapping entities can be avoided by using a standard data model.

One council said: 'We'd like to see this to avoid data sharing issues externally, as well as supporting system integration internally. Focusing on this would be necessary to reduce data quality management burden which would otherwise grow.'

Lower priority challenges

Areas that were not validated by housing provider stakeholders at the June 2025 roundtable

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Agreeing definitions across many teams takes time

A housing association wanted to ensure that key terms were understood across the business. It had no data dictionaries in place.They worked to produce a data dictionary bringing stakeholders together to agree definitions. This required a lot of time and patience to achieve.

We've heard councils have had the same issues with property hierarchy. However at a roundtable, housing stakeholders argued this was an issue to do more with policy design and guidance than data standards

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Interpreting the legislation and then changing processes creates additional cost to the sector

A housing provider data leader at the G15 Data Forum said "We need definitions standards. With the Tenant Satisfaction Measures (TSMs) there were no standard definitions. Will burn a lot of time across Housing Associations interpreting this. For example, with complaints response times everyone is counting it slightly differently. We create policy and then throw over the fence for everyone to interpret."

However, at our roundtable in June 2025 it was felt this was more a challenge for policy guidance development than data standards.

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Appendix

Types of data standards

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Types of standards

We'll use this list to tag insights with the relevant standards they may relate to