

Housing HHSRS Policy

Version control

Avoid referring to printed versions of this document. Printed versions may be out of date.

Owner/responsibility for compliance		Head of Housing Technical Services	
Status (draft / approved and live)		Approved and Live	
Version no:	Date approved:	Approved by:	Summary of changes made to each version:
1.1		Cabinet	New policy

1 Introduction

- 1.1 This policy is to support Swindon Borough Council ('the Council') in its function as a landlord to provide safe and effective housing management.
- 1.2 The Council is responsible for repairs and maintenance to our homes, communal blocks and other properties we own and manage. This policy sets out how the Council will identify, assess, manage, and remediate risks to residents arising from housing hazards using the Housing Health and Safety Rating System (HHSRS), the purpose is to:
 - Protect the health, safety, and well-being of tenants, residents, visitors, and members of the public.
 - Ensure compliance with legal and regulatory requirements.
 - Provide a consistent framework for identifying and addressing housing hazards.
 - Set clear responsibilities for colleagues, contractors, and residents.
 - Support transparency, accountability, and continuous improvement.
- 1.3 The Council is committed to providing and maintaining homes that are safe, healthy, and free from serious hazards. The Council recognises its statutory duties under the Housing Act 2004 and associated legislation and will ensure that all homes owned by the Council meet acceptable health and safety standards.
- 1.4 This policy is to ensure our Cabinet, Corporate Management Team, colleagues, partners and tenants are clear on our legal and HHSRS obligations. This policy provides the framework our colleagues and partners will operate to meet these obligations.
- 1.5 In developing this policy residents' and partnering agencies' views and feedback have been considered. An Equalities Impact Assessment has been carried out and there are no adverse implications.
- 1.6 The results of the Equalities Impact Assessment have been considered and there are no adverse implications or if there were these have been considered and mitigated.

2 Equality and diversity statement

2.1 Swindon Borough Council is intent on ensuring people or communities do not face discrimination or social exclusion due to socio-economic deprivation or, any of the following protected characteristics:

- Age
- Disability
- Sex
- Marriage & civil partnership
- Race
- Religion or belief
- Sexual orientation
- Gender reassignment
- Pregnancy & maternity

Legislation and guidance

2.2 The legislation and guidance applicable to this policy is the following:

- Landlord and Tenant Act 1985
- Decent Homes Standard
- The Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025
- Homes (Fitness for Human Habitation) Act 2018
- Pre-Action Protocol for Housing Conditions Claims (England), 2021
- Housing Ombudsman One Year on Spotlight Report on Damp and Mould 2023
- Housing Health and Safety Rating System introduced under Part 1 of the Housing Act 2004
- Social Housing (Regulation) Act 2023
- Awaab's Law
- Regulatory Reform (Fire Safety) Order 2005
- The Building Regulations 2010
- Construction, Design, and Management (CDM) Regulations 2015
- Defective Premises Act 1972
- Workplace (Health Safety and Welfare) Regulations 1992
- Provision and Use of Work Equipment Regulations 1998
- Data Protection Act 2018
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).
- Equality Act 2010

3 Scope

3.1 This policy applies to all assets owned by the Housing Revenue Account and managed by

Swindon Borough Council's Housing department.

- 3.2 This policy also applies to any property which is leased by or managed as social housing stock or used for the purposes of Temporary Accommodation for those experiencing homelessness, for which the Council owes a statutory accommodation duty.
- 3.3 This includes domestic dwellings (houses and flats), and communal areas of any blocks containing such properties, Sheltered Housing, Supported Housing, and Temporary Housing schemes.
- 3.4 The policy applies to all our colleagues, tenants, contractors, and other persons who may work on, occupy, visit, or use our premises, or who may be affected by our activities.
- 3.5 This policy covers the assessment and management of hazards identified under HHSRS at, but is not limited to:
 - Tenant/public reporting to the Council
 - Routine inspections and tenancy audits
 - Responsive repairs visits
 - Planned programmed maintenance
 - Health and Safety checks (gas, electric, fire etc)
 - Stock condition surveys
 - Empty homes (voids) inspections
 - Complaint investigations
 - Following disrepair claims or enforcement action.

4 Approach

The Housing Health and Safety Rating System (HHSRS) framework

- 4.1 The HHSRS is a risk-based assessment tool used to identify and evaluate hazards that may affect the health and safety of occupiers. The scores are based on the risk of harm to the occupiers of a dwelling which results from a deficiency, and the seriousness of that harm.
- 4.2 HHSRS inspections give hazard scores for 21 health and safety areas, and have been arranged into four main groups:

Protection against accidents

- 4.3 Includes:
 - Falls on the level
 - Falling on stairs etc.
 - Falling between levels
 - Fire and explosions
 - Flames, hot surfaces, etc.
 - Collisions, entrapments and ergonomics
 - Electrical hazards.

4.4 **Physiological requirements**

4.5 Includes:

- Excess cold
- Radiation
- Damp and mould growth
- Lead
- Indoor air pollutants
- Excess heat
- Asbestos and MMF (Man-made mineral fibres).

4.6 **Protection against infection**

4.7 Includes:

- Domestic hygiene
- Water supply.

4.8 **Psychological requirements**

4.9 Includes:

- Crowding by space
- Entry by intruders
- Noise
- Lighting and obstructed views.

4.10 Hazards are assessed and categorised as:

- **High Risk (previously Category 1 Hazard)** is a serious and immediate risk to health and safety.
- **Medium Risk (previously Category 2 Hazard)** is a less serious and/or less urgent risk.
- **Low Risk (previously Category 2 Hazard)** is a recommendation.

Risk assessment and prioritisation

4.11 When assessing a hazard, HHSRS assessors determine the level of harm that could occur based on the circumstances being assessed. Based on the severity of harm, the assessment classifies potential harm into one of four classes:

- Extreme harms
- Severe harms
- Serious harms
- Moderate harms.

4.12 The HHSRS formula is used to calculate the hazard score using representative scale points to denote likelihood.

4.13 The assessor uses scoring bars, one for each class of harm outcome. The spread of harm outcomes must add up to 100% across all four classes. The assessment is how likely there will be an event in the next 12 months that could lead to harm. An outcome score will be captured as:

- Very unlikely
 - Unlikely
 - Likely
 - Very likely.
- 4.14 The HHSRS uses a formula to generate the final hazard score by using, the likelihood expressed as a fraction (e.g., 1 in 100 becomes 1/100 or 0.01), the harm outcome score expressed as a percentage (e.g., 50%), and four constant weighting scores. The weighting scores are used to capture the impact that each different harm outcome class has on the level of risk. The final hazard score identifies the level of risk presented by the hazard.
- 4.15 The final rating classifies the hazard into one of three bands:
- Low.
 - Medium.
 - High.
- 4.16 Hazards scoring below 100 are banded 'low', hazard scores between 100 and 999 are banded 'medium', and hazard scores of 1000 or more are banded 'high'.
- 4.17 As defined by the Housing Act 2004, hazards are captured into two categories, referred to as Category 1 and Category 2 hazards. Hazards scoring over 1000 are classified as Category 1 hazards, and scores of under 1000 are classified as Category 2 hazards.
- 4.18 When a high-risk hazard is identified, the Council has a legal duty to resolve.
- 4.19 When a medium risk hazard is identified, the Council has discretion to resolve.
- 4.20 When a low-risk hazard is identified, the council will review and consider acting within a planned maintenance or capital programme of work.

Hazard identification

- 4.21 A hazard is any risk of harm to the health or safety of an actual or potential occupier that arises from a deficiency.
- 4.22 In some cases, as well as being a hazard in its own right, a hazard may increase the likelihood of an occurrence of, or the severity of harm likely to result from another hazard. i.e., electrical hazards can increase the risk of fire, which in itself is a serious hazard.
- 4.23 Hazards may be identified through:
- Routine and planned inspections
 - Stock condition and compliance surveys
 - Repairs reporting by residents
 - Colleague observations
 - Contractor reports
 - Complaints and feedback

- Disrepair claims or legal action
- Referrals from partner agencies or local authorities.

4.24 All colleagues have a duty to report potential hazards promptly.

When a hazard is identified

4.25 Upon being made aware of a hazard, the Council will:

- Triage to determine if the hazard is an emergency or significant in accordance with Awaab's Law.
- Consider the vulnerability of occupants (e.g. children, elderly, disabled residents).
- Schedule an assessment within statutory timescales.
- Any identified emergency or significant relevant safety works will be completed within the statutory timescales
- Any preventative works are initiated and completed within the statutory timescales
- Assess the likelihood and severity of harm.
- Prioritise actions based on risk.

4.26 HHSRS hazards and Awaab's Law are directly connected. The HHSRS identifies and categorises the hazard, while Awaab's Law sets mandatory timescales to remove the hazard and make the property safe.

Emergency Hazards – as defined by Awaab's Law

4.27 On finding emergency hazards, the council will:

- Investigate within 24 hours of becoming aware
- If emergency hazards are found we will complete repairs, or make safe, within 24 hours.
- If the repair cannot be completed within 3 days a summary report will be issued.

4.28 If the identified emergency or significant hazard cannot be removed within statutory timescales the Council will consider the individual circumstances of the household, including any vulnerabilities and will offer temporary accommodation.

Significant Hazards – as defined by Awaab's Law

4.29 On finding significant hazards, the council will:

- Investigate within 10 working days of becoming aware.
- Undertake relevant safety works within 5 working days.
- Begin or take steps to begin any further supplementary works to prevent the hazard from reoccurring within 5 working days of concluding the investigation.
- If the repair cannot be completed within 3 days a summary report will be issued.

4.30 Where further supplementary works are required and it is not possible to begin them within 5 working days, the Council will start these as soon as reasonably practicable and within 12 weeks of the investigation concluding.

- 4.31 Works undertaken in this period may be interim works (such as a mould wash) to reduce the risk, pending further works which require more time - up to 12 weeks to be completed.
- 4.32 Where extensive work may be required, the Council will consider the individual circumstances of the household, including any vulnerabilities, and may offer temporary accommodation.

No hazard (Awaab's Law)

- 4.33 If a hazard does not meet the requirements to be classed as an emergency or a significant hazard, then any remedial work required to rectify the issue will be dealt with as a routine repair.

Remedial action

- 4.34 The Council will take appropriate steps to:
- Remove or reduce hazards to an acceptable level
 - Ensure works are completed competently by our own operatives or contractors.
 - Maintain records of identified hazards and actions taken.
 - Where necessary, consider temporary measures, temporary alternative suitable accommodation, or restrictions on use.
- 4.35 All work will comply with relevant building regulations, health and safety standards, and best practice guidance.

5 Resident engagement

- 5.1 The Council will:
- Provide residents with clear information about identified hazards and proposed actions.
 - Offer advice where resident behaviour may contribute to risk (e.g. condensation management).
 - Take account of resident vulnerabilities and needs.
 - Keep residents informed of timescales and progress.
 - Provide clear routes for reporting concerns or escalating unresolved issues.
 - Take steps to ensure that any individual discretion of case handlers/investigators or anyone else in the decision-making process is not affected by conscious or unconscious bias or prejudice.

6 Access arrangements

- 6.1 For full details around access arrangements, please see the Housing Access Policy.
- 6.2 Residents are expected to allow reasonable access for inspections and repairs.
- 6.3 The Council will give 24 hours' notice in writing for any investigation or remedial works to take place.

6.4 Where access is not granted, the Council will consider enforcement action for breach of tenancy, including:

- Serving a Notice of Seeking Possession, letting residents know our intention to seek possession of their home.
- Ask the court for an injunction to allow access into the home Residents are expected to report hazards promptly. This can be done by:
- Contacting Customer Services by email, phone, post.
- Online Housing Repair Request form.
- Directly to a member of Housing Services.

7 Record keeping

7.1 The Council will maintain accurate records of:

- Property inspections and assessments
- Identified hazards and risk ratings
- Actions taken and completion dates
- Resident communications
- Enforcement or legal outcomes.

8 Monitoring and review

8.1 This policy will be reviewed every two years or sooner if legislation or regulations change.