

HHSRS Made Simple

The Essential Escalation Framework Every Property Manager Must Know

Updated for the reformed Housing Health and Safety Rating System, in force from 23 June 2026, and the Renters' Rights Act 2025 changes now live.

21

hazard categories

3

risk bands: High, Medium,
Low

4

escalation questions

A free guide for property managers, letting agents, build-to-rent operators and inventory clerks

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Why we've updated this guide

The reformed HHSRS has been in force since 23 June 2026, so the questions have moved on from “what’s coming?” to “what do we do now?” Our March 2026 edition looked ahead to the reform. This edition reflects the framework as it actually landed, and the parts of the Renters’ Rights Act 2025 that are now live.

The headline hasn’t changed: lettings staff don’t need to be HHSRS assessors. What they need is a reliable way to recognise, record and escalate issues that could affect someone’s health or safety. That’s what the escalation framework in this guide is for.

Who this guide is for: property managers, letting agents, build-to-rent operators and inventory clerks working in England’s private rented sector.

What’s different from the March 2026 edition

March 2026 edition said	Position at October 2026
HHSRS covers 29 hazards, reform expected	21 hazard categories, in force since 23 June 2026
A Red / Amber / Green traffic light system was expected	Hazards are now banded High, Medium or Low (with colour coding in the official guidance)
Mandatory timeframes expected across all hazards	Awaab’s Law timeframes still apply to social housing only. Extension to the PRS is a future commitment with no confirmed date
Reformed system estimated for 2028	Already in force. “HHSRS 2” is informal shorthand, not an official name
Section 21 abolition coming	Section 21 abolished for the PRS from 1 May 2026
No formal tool for non-assessors	Official baseline indicators checklist now published for landlords and agents

Where things stand: October 2026

Some of the changes are live, some are law but not yet switched on, and some are still only commitments. Mixing these up is the most common mistake we see in sector content, so here's the status of each.

Change	Status	What it means in practice
Reformed HHSRS (21 hazards, High / Medium / Low)	In force From 23 June 2026	Councils now assess and enforce using the new framework, guidance and case studies
Section 21 abolished, periodic tenancies, reformed Section 8	In force For the PRS from 1 May 2026	Tenants have more security, so they're more likely to report problems
Higher civil penalties (maximum up from £30,000 to £40,000)	In force From 1 May 2026	Bigger financial exposure for serious or repeat breaches
Rent Repayment Orders: cap doubled from 12 to 24 months' rent	In force From 1 May 2026, for offences on or after that date	Greater tenant-led financial risk for landlords
New standalone civil penalty for a Category 1 hazard	In force Reported from 22 June 2026: check current GOV.UK guidance	Councils may be able to fine without first serving an improvement notice
PRS Landlord Database	Enacted, not yet live Rollout targeted from late 2026	Councils will gain a searchable picture of local private rented stock once it's live
PRS Landlord Ombudsman	Enacted, not yet live Mandatory sign-up targeted around 2028	A future redress route for tenants, separate from council enforcement
Awaab's Law timeframes	Social housing only Since October 2025	Not a legal requirement for private landlords. Useful as a good practice benchmark
Awaab's Law extended to the PRS	Proposed Government commitment, no confirmed date	Watch this space, but don't present it as current law
Decent Homes Standard extended to the PRS	Enacted, not yet live Standard not yet made: targeted 1 April 2035	The future lettable baseline, not a current requirement

One thing hasn't changed: there's still no fixed statutory frequency for HHSRS inspections of private rented homes. Inspections are usually triggered by a tenant complaint, a referral, licensing or a council's own inspection programme.

What the reformed HHSRS actually changed

The system is simpler to read, but the underlying method is the same: a trained assessor judges the likelihood of harm over the next 12 months, and the likely spread of harm, for the most vulnerable age group.

Fewer hazards: 29 down to 21

Several categories were merged:

Old categories	Now combined as
Falls on level surfaces, and falls associated with baths	Falls on the level
Fire, and explosions	Fire and explosions
Collision and entrapment, and position and operability of amenities	Collisions, entrapment and ergonomics
Uncombusted fuel gas, biocides, carbon monoxide and fuel combustion products, volatile organic compounds	Indoor air pollutants
Food safety, domestic hygiene, pests and refuse, personal hygiene, sanitation and drainage	Domestic hygiene

Simpler bands: High, Medium, Low

The old ten bands (A to J) have gone. The Category 1 and 2 duties themselves are unchanged, and only a trained assessor can place a hazard in a band.

High

Score 1,000 or more

Category 1 hazard

Council has a duty to act

Medium

Score 100 to 999

Category 2 hazard

Council has discretion to act

Low

Score below 100

Category 2 hazard

Council has discretion to act

The 21 hazard categories

The full list, in the four official groups:

Protection against accidents

- 1 Falls on the level
- 2 Falling on stairs etc.
- 3 Falling between levels
- 4 Fire and explosions
- 5 Flames, hot surfaces etc.
- 6 Collisions, entrapment and ergonomics
- 7 Structural collapse and falling elements
- 8 Electrical hazards

Physiological requirements

- 9 Excess cold
- 10 Radiation
- 11 Damp and mould growth
- 12 Lead
- 13 Indoor air pollutants
- 14 Excess heat
- 15 Asbestos and MMF

Protection against infection

- 16 Domestic hygiene
- 17 Water supply

Psychological requirements

- 18 Crowding and space
- 19 Entry by intruders
- 20 Noise
- 21 Lighting and obstructed views

Plain-English likelihood terms

Likelihood is now described as very likely, likely, unlikely or very unlikely alongside the ratio, to help people without formal training follow an assessment.

Baseline indicators: the biggest practical change for lettings teams

The guidance now includes baseline indicators of reasonable standards, plus an abbreviated self-assessment checklist for landlords and agents. Anything below a baseline indicator is a deficiency that should be considered for assessment. They're not minimum standards and they don't replace the risk assessment.

New case studies replace the old worked examples, and a new tenant guide has been published alongside a redrafted landlord and agent guide and enforcement guidance.

A note on wording: the Operating Guidance calls the middle band "Medium", while the landlord and agent guide describes Category 2 as split into "low risk and moderate risk". The Operating Guidance is the higher source, so we use High / Medium / Low throughout.

The line that matters: recognise, record, escalate

The reformed guidance draws the line more clearly than ever. Spotting and recording deficiencies is open to everyone. Scoring a hazard is for trained assessors only.

“Full assessments involving scoring should only be carried out by those trained in the HHSRS assessment process, however, preliminary property safety assessments can be completed using the HHSRS baseline indicators checklist.”

HHSRS Operating Guidance Part 1, June 2026

“There is no requirement for landlords and property agents to become trained HHSRS assessors, but landlords need to keep their homes free of Category 1 hazards.”

Landlord and agent guide to the HHSRS, GOV.UK, June 2026

That second quote is addressed to landlords and property agents specifically. The guidance doesn't name inventory clerks, but the same logic applies to anyone inspecting on a landlord's or agent's behalf: record what you see, don't rate it.

In scope for lettings staff and clerks	Out of scope without HHSRS training
Recording what's visible, with dated photos and notes	Deciding the likelihood of harm ("1 in 100")
Checking against the official baseline indicators	Estimating the spread of harm across the four classes
Noting that something falls below a baseline indicator	Calculating a hazard score
Flagging that a hazard category may be relevant	Saying a hazard is High, Medium, Low, Category 1 or Category 2
Escalating promptly to the right person	Telling a landlord a property "passes" or "fails" HHSRS

This boundary isn't about how much information you have. Even with full measurements, photos and occupancy details, likelihood and harm judgements need assessor training. Better data makes your escalation stronger: it doesn't turn an inspection into an assessment.

Who can carry out a formal assessment?

The Housing Act 2004 doesn't prescribe a single qualification. Councils use Environmental Health Officers or other appropriately trained officers for enforcement, and the reformed guidance notes that training requirements for assessors have been updated.

Recognised training routes have included ABBE-accredited HHSRS qualifications and CIEH programmes. Check the current offer from any provider before recommending it.

The landlord's duty stays with the landlord

HHSRS-related duties, along with gas, electrical, alarm and fitness-for-habitation duties, sit with the landlord and can't be passed on by appointing an agent. A fully managed service doesn't change that.

What an agent can do, such as instructing contractors, spending money or arranging specialists, depends on the management agreement, so check it before acting.

In short

There's no single qualification required by law, but there is a clear expectation of competence.

Lettings staff and clerks recognise, record and escalate.
Trained assessors score.

Why professional judgement still matters

What you can see is often a symptom, not a cause. Here's what a lettings professional can reasonably record for some of the most common hazards, and what needs a specialist.

Hazard	What you can record	Why it needs a specialist
Damp and mould growth	Location and extent of mould, staining, condensation, missing or broken extractor fans, tenant reports	The cause could be condensation, penetrating or rising damp, or a leak. Treating the wrong one leaves the hazard in place
Excess cold	Heating not working, rooms reported as cold, single glazing, visible draughts	Cold can come from the heating, insulation, glazing or thermal bridging. Assessment looks at the whole thermal envelope
Fire and explosions	Missing or failed alarms, blocked escape routes, damaged or propped fire doors	Compartmentation, escape routes and detection need fire safety expertise. The reformed guidance has a separate fire safety part
Electrical hazards	Damaged sockets or fittings, scorch marks, exposed wiring, missing or out-of-date EICR	Concealed wiring and overloading can't be judged by eye
Structural collapse and falling elements	Cracks, sagging ceilings, loose render or roof tiles, uneven floors	Telling cosmetic movement from structural risk needs a surveyor or engineer
Asbestos and MMF	Textured coatings, older floor tiles, pipe lagging or boards in a property of known older age	Asbestos can't be identified by appearance. Disturbing it can create a bigger risk
Indoor air pollutants (now includes carbon monoxide and fuel gas)	Missing CO alarms, sooting around appliances, no gas safety record, tenant reports of fumes or headaches	Carbon monoxide is invisible and odourless. Appliances and flues need a Gas Safe engineer
Radiation (includes radon)	Property location, tenant questions about radon	Radon can only be confirmed by testing

If you've recorded something in the second column, your job is done well when it reaches the right person quickly with good evidence. You don't need to fill in the third column yourself.

What this means for your role

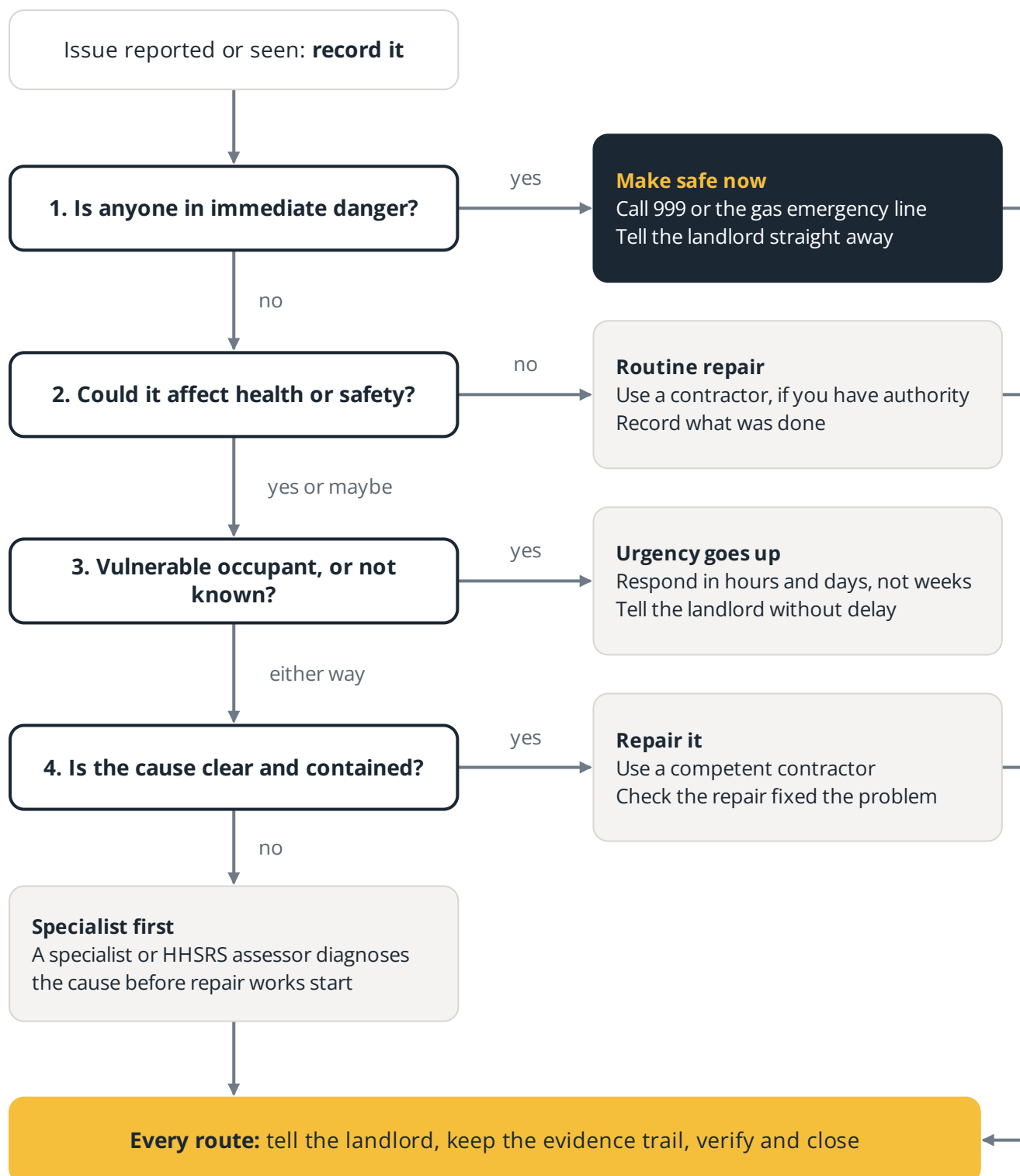
Everyone in the chain has a part to play, but the parts are different. Authority to act always depends on your contract, terms of business or management agreement.

Role	Your part	Watch out for
Property managers	Run the triage, route issues to the right contractor or specialist, keep the landlord informed, track issues to closure	Acting beyond your spending or instruction limits. If the agreement doesn't give authority, get the landlord's instruction in writing
Letting agents (let only or managed)	Advise landlords on their duties, use the baseline indicators at pre-let and during tenancy, pass on hazard reports promptly	Describing a property as "HHSRS compliant" or giving a hazard rating. That's an assessor's call
Build-to-rent operators	Usually you're the landlord, so the duty sits with you directly. Build inspection and escalation into your operating procedures across the portfolio	Assuming on-site teams can score hazards. Use the same recognise, record, escalate approach and commission assessors where needed
Inventory clerks	Record condition accurately and consistently, flag possible health and safety issues clearly in the report, note what you couldn't inspect	Rating hazards in the report, or contacting the council yourself. Your client decides on escalation, unless your terms say otherwise

None of these roles should assume that the council or Environmental Health needs to be involved. Most issues are resolved by the landlord acting promptly once they're properly reported.

The Simple Escalation Filter, updated for 2026

Four questions, danger first. Work down the left-hand column: a “yes” sends you right. Question 3 raises the urgency, then you carry on to question 4.



Working through the four questions

✓ Before you start: record it

Write down what you saw, where, when and who reported it, with dated photos. If an official baseline indicator applies, note whether it's met. Don't wait until you know the cause before recording.

1 Is anyone in immediate danger? New

Think: a smell of gas, a CO alarm sounding, exposed live wiring, something at risk of falling, or a serious fire risk. If yes, the priority is safety, not paperwork.

- Call 999 if there's a risk to life. For a suspected gas leak in England, call the National Gas Emergency Service on 0800 111 999.
- Tell the landlord straight away and record the times.
- Only arrange make-safe works yourself if your management agreement gives you emergency authority. If it doesn't, get the landlord's instruction.

2 Could it affect someone's health or safety?

Not just "is it broken?" but "could this hurt, sicken or distress someone?" A dripping tap is a repair. Persistent mould in a bedroom is a health risk. A loose door handle is a repair. A front door that won't lock is a safety issue.

- **No:** treat it as a routine repair. Instruct a contractor if you're authorised, otherwise pass it to the landlord, and record what was done.
- **Yes, or possibly yes:** go to question 3. If a baseline indicator isn't met, treat it as "possibly yes".

3 Are vulnerable people living there, or don't you know?

Young children, older people, and people with respiratory, heart or other health conditions or a disability can be more at risk. Unknown vulnerability should make you more cautious, not less.

- **Yes or unknown:** respond in hours and days, not weeks, and tell the landlord without delay.
- **No:** carry on to question 4 at normal priority.

Two things to know. A formal HHSRS assessment always assumes the most vulnerable age group for that hazard, whoever actually lives there. The actual occupants affect how fast you respond, not the hazard's rating. And information about health or disability is sensitive personal data: record only what you need (for example "vulnerable occupant: yes / no / unknown") and follow your data protection policy.

In the most serious cases, the landlord may need to consider temporary alternative accommodation while the problem is fixed. That's the landlord's decision: agents should take advice before arranging it.

4 Is the cause clear and contained?

A property manager can reasonably oversee a repair when the cause is obvious: a leaking pipe, a broken extractor fan, a failed window seal. If the cause is unclear, recurring or possibly structural, such as mould with no obvious leak, or a room that stays cold with the heating on, a visual check isn't enough.

- **Yes:** repair it with a competent contractor, check the repair has fixed the problem, and tell the landlord the outcome.
- **No:** commission a specialist (or, where the landlord wants an independent view of the risk, an HHSRS assessor) before repair works start. Repairing without knowing the cause risks treating the symptom and leaving the hazard in place.

When the landlord doesn't act

If a landlord won't deal with a health or safety issue, take advice on your options under the management agreement and your redress scheme's code of practice. Don't assume the council or Environmental Health needs to be involved, and don't contact them on the landlord's behalf without authority. Tenants can always contact their council themselves.

What a solid professional process looks like

If a tenant complains to the council, or a dispute reaches a tribunal, your records are what show the issue was taken seriously. Build them as you go.

- Before, during and after tenancy reports that show the property's condition consistently over time.
- Well-lit, dated and time-stamped photos that clearly show change, deterioration or repair.
- Structured checks against the official baseline indicators at each milestone, without attempting diagnosis.
- A triage process that routes each issue to the right contractor or specialist and records every step.
- Fast escalation when something may affect health, safety or a vulnerable occupant.
- Access to qualified specialists (surveyors, damp specialists, electricians, Gas Safe engineers, fire safety professionals, HHSRS assessors) when the cause is unclear or recurring.
- Clear tenant reporting channels, with acknowledgement and updates.
- A review of repeat observations across inspections, so patterns are spotted early.

The evidence trail for each issue

For anything that might be a hazard, aim to hold these records, in date order:

Stage	Evidence
1. First report	Who reported it, date and time, original wording, photos
2. Inspection	Inspection notes, dated photos, any measurements taken by someone qualified to take them
3. Landlord notified	Date, method and content of notification
4. Instruction	Landlord's instruction or authority under the management agreement, works order
5. Specialist or contractor	Specialist findings, contractor report, cause identified
6. Works	Dates attended, works completed, invoices
7. Verification	Follow-up photos or inspection confirming the issue is resolved
8. Closure	Tenant informed, issue closed, review date if it could recur

A note on timeframes

Awaab's Law timeframes are not yet law for private landlords. Many agents are choosing to use them as a voluntary benchmark, which is reasonable good practice, but don't tell landlords or tenants they're a legal requirement.

For smoke and CO alarms, the legal standard is repair or replacement as soon as reasonably practicable once reported.

How Inventory Hive helps

Inventory Hive is built around the recognise, record, escalate workflow, giving you a clear, evidence-based audit trail without asking your team to act as assessors.

- ✓ Structured reports before, during and after tenancy.
- ✓ Report templates aligned to the reformed 21 hazard categories and the official baseline indicators, designed for awareness-level screening, not scoring.
- ✓ Detailed, time-stamped photographic evidence, with optional 360° camera integration.
- ✓ Tenant photo and comment feedback.
- ✓ Issue flagging and export, or routing straight into maintenance through our Fixflo integration.



Legal disclaimer

This guide gives general information about the Housing Health and Safety Rating System and related private rented sector changes in England. It's accurate to the best of our knowledge as at October 2026. Housing law, guidance and implementation dates change, sometimes without notice, and several Renters' Rights Act 2025 measures are still being brought in by stages.

Nothing in this guide is legal advice, and it isn't a substitute for professional legal or regulatory guidance. It doesn't determine how any property should be assessed under the HHSRS. Always consult qualified professionals or take independent legal advice before making decisions with legal or financial consequences.

Sources

HHSRS Operating Guidance, Parts 1 to 3 (GOV.UK, June 2026)

www.gov.uk/government/publications/housing-health-and-safety-rating-system-hhsrs-operating-guidance

Landlord and agent guide to the HHSRS (GOV.UK, published 23 June 2026)

www.gov.uk/government/publications/housing-health-and-safety-rating-system-hhsrs-landlord-and-agent-guide

HHSRS Enforcement Guidance (GOV.UK, June 2026)

HHSRS 2026 case studies (GOV.UK)

Renters' Rights Act 2025 and the Renters' Rights Act 2025 (Commencement No.2 etc.) Regulations 2026 (SI 2026/421)

GOV.UK Renters' Rights Act implementation roadmap

GOV.UK Awaab's Law guidance for social landlords

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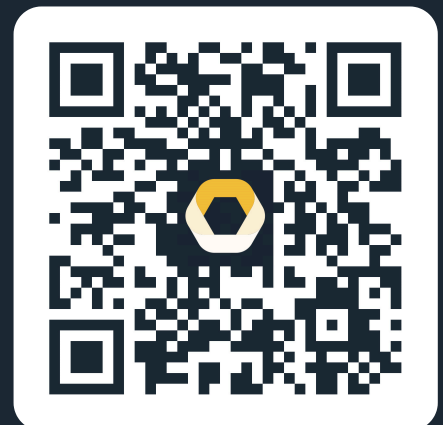
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