

BRIEFING · AUGUST 2026

Artificial Intelligence in *UK Social Housing*

Repairs, damp and building safety. What the evidence says, what the regulator expects, and what can safely be done before 30 November.

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Prepared as a market briefing. Every figure is traced to a regulator, a government department, the Housing Ombudsman, published legislation, or named academic research.

A note on the numbers

Most published statistics about AI in social housing are produced by companies selling AI into social housing.

Repeating those figures is the fastest way for a briefing to lose its authority. They are precise, quotable and almost never sourced. Trace them back and they end at a marketing page with no methodology and no named organisation.

So this document sets a rule for itself. Everything here is traced to a regulator, a government department, the Housing Ombudsman, published legislation, or named academic research. Where a figure could not be traced to one of those, it has been left out — including two that would have made the argument look stronger.

INCLUDED

Named, primary sources

MHCLG, the Regulator of Social Housing, the Housing Ombudsman, statutory instruments, and research from Leeds University Business School.

EXCLUDED

Two headline figures

A widely-quoted “98% accuracy” claim, and a “90% of providers” adoption figure that does not appear in the research it is attributed to.

NAMED

Only regulatory findings

Landlords are named only where the source is a published regulatory judgement or Ombudsman finding — never press reporting.

The two figures that were left out

The first is the accuracy claim attached to the sector's best-known damp and mould prediction project. It circulates as “98% accuracy”. The supplier's own published case study is titled 70–97%, and the reason for the range is the point: accuracy was high where the data was high quality, and fell to around 70% where the data was incomplete. Quoting the ceiling and dropping the condition inverts the finding. Section 11 uses the range.

The second is more instructive. A figure stating that over 90% of housing providers have begun experimenting with generative AI is widely attributed to research published by Leeds University Business School. It does not appear in that research. The study's actual figures are 22% and 31%, and they say something considerably more interesting. Section 6 uses the real ones.

THE POSITION

Stated as at 3 August 2026. Phase 2 of Awaab's Law comes into force on 30 November 2026 and remains subject to parliamentary approval.

The sector

This is not a sector short of money or intent. It is a sector against a clock.

4 million

social housing tenants in England

4.5m

social homes, held by around 1,580 registered providers

£39bn

government social and affordable homes programme

30 Nov

Awaab's Law Phase 2 comes into force, adding seven hazard types

Sources: MHCLG, 13 July 2026; Regulator of Social Housing stock and rents statistics 2024-25.

Stock is growing, with a net increase of close to 38,000 social homes in the most recent year. A £39bn programme is running behind it, alongside a Social Housing Bill and a £2m innovation fund aimed at strengthening tenants' voices. By the measures a board usually watches, the direction is positive.

What has changed is the law. Since October 2025 a landlord in England has been subject to fixed statutory timeframes for dealing with hazards in a tenant's home. From 30 November 2026 those timeframes apply to seven further categories of hazard, and in 2027 to almost all of them. The obligation is not to intend well or to invest. It is to act within a defined number of days from a defined starting point — and to be able to show that you did.

WHY THIS FRAMING MATTERS

A briefing that opens on crisis invites scepticism, because the sector data does not support it. A briefing that opens on a well-funded sector facing a hard, near-term legal deadline is both accurate and more useful, because it points at where the work actually is.

Awaab's Law

The law attaches a clock to a hazard, and the clock starts earlier than most landlords assume.

Awaab's Law came into force for the social rented sector in England on 27 October 2025, following the death of two-year-old Awaab Ishak in December 2020. Phase 1 covers significant hazards relating to damp and mould, together with all emergency hazards.

TIMEFRAME	REQUIREMENT
24 hours	Investigate any potential emergency hazard and, where confirmed, complete relevant safety work. If the home cannot be made safe within 24 hours, the landlord must offer suitable alternative accommodation.
10 working days	Investigate any potential significant hazard, from the point of becoming aware of it.
3 working days	Provide the tenant with a written summary of the investigation and its findings.
5 working days	Complete relevant safety work where the investigation identifies a significant hazard – meaning the home is made safe within 15 days or less.
12 weeks	Begin, or take steps to begin, longer-term and supplementary preventative works.

What Phase 2 adds

The Phase 2 regulations were laid in Parliament on 13 July 2026 and come into force on 30 November 2026, subject to parliamentary approval. They extend the same framework – the timeframes do not change – to seven further hazard categories: electrical hazards; falls, including on the level, on stairs and between levels; fire and explosions; excess cold; excess heat; structural collapse and falling elements; and domestic hygiene. In 2027 the regime extends to all remaining hazards under the Housing Health and Safety Rating System, except overcrowding.

The rating system itself was recently updated for the first time in twenty years, which means the categories a landlord is being measured against have moved at the same time as the duties attached to them.

A LIABILITY THE SECTOR HAS NOT FULLY ABSORBED

MHCLG's guidance is explicit that liability for a contractor's actions "is likely to depend on whether the contractor is, legally, acting as an agent of the landlord", and advises landlords to take legal advice. For a landlord operating through contractors, managing agents or Tenant Management Organisations, awareness held by a third party may be awareness held by the landlord.

Source: MHCLG, Awaab's Law: Guidance for social landlords – Timeframes for repairs in the social rented sector, updated 27 October 2025; MHCLG press release, 13 July 2026. The instrument is the Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025.

The clock starts when you become aware

Not when a repair is raised. Not when a survey is booked.

Day zero in the Awaab's Law timeline is the moment the landlord becomes aware of a potential hazard and makes an initial assessment of whether it is significant, an emergency, or out of scope. Everything downstream is measured from that point.

That single word turns a repairs problem into a detection, routing and record-keeping problem. Awareness rarely arrives through the repairs line in a form that starts a timer cleanly. It arrives when a tenant mentions damp during a call about rent arrears. When a contractor notices mould while fixing something else. When a housing officer writes an observation into a visit note. In a text message, an email, a complaint about something adjacent, or through a Tenant Management Organisation delivering services on the landlord's behalf.

What a landlord now needs to be able to produce, for any property and any hazard, is a record of when awareness began, what was done, when it was done, and what the tenant was told. From 30 November that applies across seven more hazard types, on an estate of four million homes.

THE PARALLEL WORTH DRAWING

This is the same shape of problem that section 80 of the Data (Use and Access) Act created in financial services. The legal threshold moved, and the evidential burden moved with it. Detection and record-keeping stopped being operational hygiene and became a statutory obligation.

It is also, unusually, a problem that AI is genuinely well suited to. Finding a mention of damp inside an unstructured conversation, an email thread or a case note is exactly the kind of task current systems do well, and exactly the kind of task that does not require a machine to decide anything. The decision — is this a hazard, and how serious — remains with a person. What changes is whether that person ever sees the signal.

The conduct picture

Property condition dominates the Ombudsman's casework, and the rate is not improving.

71%

overall maladministration rate,
down two points on the year

+43%

increase in property condition
findings, with no improvement
in the rate

40%

of compensation related to
leaks, damp and mould

131

landlords received at least one
severe maladministration
finding

Source: Housing Ombudsman, Annual Complaint Review 2024-25, published 23 September 2025 – the latest available at the time of writing. 26,901 interventions were made during the year, and 120 landlords had 75% or more of complaints upheld.

There are encouraging signs in the same review. The overall rate fell two percentage points, complaint handling findings fell seven, and sixteen landlords significantly improved their performance. Two – North Devon Homes and Pickering and Ferens Homes – had several complaints investigated with no failings found at all. The direction of travel in complaint handling is upward.

Property condition is the exception. Findings rose 43%, far above the overall rise in investigations, and the maladministration rate did not move. Local authority landlords and medium-sized housing associations are under the most acute pressure.

What the Ombudsman says the cause is

Culture, communication, and data integrity are pivotal to the outcome of a complaint.

That is Richard Blakeway, the Housing Ombudsman, in September 2025. His service has a settled term for the third of those – Knowledge and Information Management – and a Spotlight report behind it. The Ombudsman's own description of what good looks like is that landlords have a single version of the truth. Where that does not happen, the reported consequences are multiple inspections of the same problem, works incorrectly closed, and indefinite delay.

Those three failure modes are worth reading against the Awaab's Law timeframes. Each of them is a failure to know what the organisation already knows.

What Phase 2 will mean in practice

The Ombudsman published three cases in its 2024-25 review to illustrate the effect of poor conditions on residents' lives. They are worth setting out in full, because of what they become on 30 November.

TWO YEARS

A household living with bin bags covering a hole in their living room ceiling, with the risk of asbestos. **Structural collapse and falling elements — a Phase 2 hazard.**

THREE YEARS

A resident living without functioning heating and hot water. **Excess cold — a Phase 2 hazard.**

FOUR YEARS

A child whose bedroom window was boarded up, with the family worried about excess cold. **Excess cold — a Phase 2 hazard.**

None of these was a damp and mould case, so none fell within Phase 1. Each ran for years. Each will, from 30 November, sit inside a statutory framework requiring investigation within ten working days of the landlord becoming aware, a written summary to the tenant within three, and safety work within five.

The argument does not need to be constructed. The Ombudsman's own worst published cases from last year are precisely the failures that become legally timebound in under four months.

The capacity constraint is in assessment

It is tempting to read this as a shortage of repair operatives. The evidence points somewhere more specific. The binding constraint is the availability of people who can assess a home, categorise a hazard correctly under the rating system, and record it in a way that survives scrutiny.

Industry estimates put the shortfall in London's social housing sector alone at around 2,600 skilled people, against a construction-wide picture of roughly 140,000 vacancies and more than a third of the workforce due to retire by 2035, with shortages concentrated in technical assessment roles. These are industry figures rather than official statistics and should be read as such. The regulator-verified evidence in the next section is more telling.

Sources: Housing Ombudsman, Annual Complaint Review 2024-25. Workforce estimates from Peabody and construction sector research – industry figures, not official statistics.

The duty to hold accurate data already existed

Awaab's Law did not create it. It attached a clock to it.

The Regulator of Social Housing's Safety and Quality Standard requires landlords to maintain an accurate, up to date, and evidenced understanding of the condition of their homes and communal areas — knowledge which must reliably inform their ability to provide good quality, well-maintained and safe homes.

That duty predates Awaab's Law. What has changed is that a landlord which cannot describe the condition of its stock now also cannot reliably detect a hazard, cannot categorise it, and cannot evidence when it became aware of it.

A worked example from a regulatory judgement

In May 2026 the regulator published its first consumer grading for the London Borough of Islington, which owns 25,700 homes. The judgement is a C3: serious failings in delivering the outcomes of the consumer standards, with significant improvement needed.

- The majority of its homes have a stock condition survey more than ten years old, with no formal hazard assessment under the rating system.
- As a result the regulator has no assurance that the homes meet the Decent Homes Standard.
- The council provided limited assurance on the accuracy of its health and safety compliance data, which the regulator records as a serious failing in its own words.
- Internal audits gave limited assurance on compliance information for lifts, asbestos and fire safety.
- The council reported over 1,000 overdue lift remedial actions, with up to 500 overdue for more than a year.
- It did not fully meet Tenant Satisfaction Measure requirements in its 2024/25 return, because of system issues affecting its complaints information.

Two things make this the right example rather than an unfair one. First, Islington's repairs service met regulatory requirements — 76% of non-emergency and 95% of emergency repairs completed within target in 2024/25. The failing is not the ability to fix things. It is the record of what needs fixing.

Second, Islington is doing the right thing. It has begun an accelerated survey programme incorporating formal hazard assessments, is engaging constructively with the regulator, and has a plan. At the time of inspection that programme had covered around 13% of homes, and the council expects to complete it by the end of 2028.

THE GAP, STATED PLAINLY

A landlord acting in good faith, with a funded plan and regulatory engagement, expects to understand the condition of its own stock by the end of 2028. The duty expands on 30 November 2026.

The Tenant Satisfaction Measure failure is the same point in miniature. A system issue affecting complaints information became a regulatory failure. The data was not a reporting inconvenience; it was the obligation.

Source: Regulator of Social Housing, regulatory judgement for London Borough of Islington (00AU), published 13 May 2026. Basildon Borough Council received a C4 grading following an inspection which found a lack of accurate information on the quality of tenants' homes, particularly the recording and monitoring of potential hazards.

More staff are using AI than are authorised to

The sector's own research found adoption running ahead of governance.

Research published in November 2025 by Service Insights Ltd with academics from Leeds University Business School, sponsored by the technology company BCN, surveyed 220 staff and conducted 50 in-depth interviews across ten housing associations in England. It is the clearest measured picture of AI in the sector, and it should be read with its sponsorship in mind.

22%

report AI tools being made available for staff in specific roles

31%

are actually using AI in their working roles

93%

of those using it are positive about the benefits

220

staff surveyed, with 50 interviews across ten housing associations

The gap between 22 and 31 is the finding. More people are using AI than have been given it. In a regulated service where decisions affect tenants' homes, that is shadow adoption, and it is measured rather than asserted.

What it is being used for is mundane and revealing: writing letters to tenants, generating meeting minutes, and — the researchers note with evident amusement — on occasions generating AI policy. Aspirations run to predictive models for core services such as preventative maintenance. The distance between those two things is the distance this sector has to travel.

What the researchers concluded

Policy and strategy are not keeping pace with practice.

The impetus for adoption has come largely from middle management and front-line staff rather than from strategy. AI is often not being treated as an explicit strategic choice, which means organisations may lack a clear policy and governance framework for it. The researchers expect this position of policy catch-up to persist for a decade.

Three further findings deserve a board's attention. Staff interviewed believed human oversight would always be required — but the researchers note that as processes speed up and AI becomes embedded in applications, scrutiny of automated decisions tends to fall away. They raise concerns about deployments where the reasoning behind an outcome cannot be scrutinised at the point of use or in retrospect. And they offer a worked example of the risk: maladministration adversely affecting outcomes for tenants following a prediction of rent arrears.

They also warn about something a technology briefing would usually skip. Core sector values — equality, diversity and inclusion — risk being overlooked in the enthusiasm. Replacing conversations with chatbots reduces human contact. Digital-only services disadvantage those without online access. In a sector that exists to house people who have often been failed by other systems, efficiency and equity are not the same measure.

Source: Service Insights Ltd with Leeds University Business School, Aspirations and applications of AI in social housing, published 10 November 2025, sponsored by BCN.

The asymmetry has flipped

The people making claims are better equipped than the people receiving them.

In other sectors the AI threat is straightforward: someone fabricates evidence. In social housing it is more uncomfortable, because nobody is doing anything wrong.

Landlords work in a complex and changing environment. This will include more use of Artificial Intelligence by both landlords and residents in the complaints process.

That is the Housing Ombudsman, on the record, in September 2025. The resident side of that sentence is the one landlords have not planned for.

Practitioner accounts describe complaints now arriving that cite section 11 of the Landlord and Tenant Act 1985 and the pre-action protocol for housing disrepair, and that reference the Ombudsman's complaint-handling code clause by clause. They are copied to no-win-no-fee firms which use AI to pre-screen the claim for viability before taking it on. The effect described is a rise in the documentary and procedural burden of every case, with staffing that has not moved to match. This is practitioner commentary rather than measured data, and should be presented as such — but it is consistent with what the Ombudsman anticipated.

THIS IS NOT FRAUD, AND MUST NOT BE WRITTEN AS THOUGH IT WERE

A resident using AI to put a legitimate complaint into the language the system responds to is doing something entirely reasonable. It is arguably something the sector should welcome, since the alternative is a system that responds better to articulate complainants than to the people with the worst homes.

The problem is one-sided capability. The complaint arrives legally precise and pre-screened. It lands on a service that often cannot evidence when it first became aware of the issue, because that awareness was a sentence in a call about something else eighteen months ago.

The commercial consequence is that a landlord cannot externalise this. There is no bad actor to point at, no fraud team to escalate to. The only available response is to be able to answer the question the complaint asks: what did you know, and when did you know it.

Sources: Housing Ombudsman, Annual Complaint Review 2024-25, September 2025. Practitioner accounts reported in Inside Housing — commentary, not measured data.

Four regimes, one piece of evidence

There is no AI-specific rulebook for social housing and none is expected. That is not a lighter burden. It means every existing duty applies in full to an AI-assisted decision, and the evidence a regulator or ombudsman asks for is the same evidence either way.

Awaab's Law	Fixed timeframes running from the point of becoming aware. Phase 2 from 30 November 2026; Phase 3 in 2027. Contractor awareness may be landlord awareness, depending on agency.
Consumer standards	The Safety and Quality Standard requires an accurate, up to date and evidenced understanding of stock condition, and that all actions from legally required health and safety assessments are carried out within appropriate timescales.
Complaint Handling Code	Complaints must be addressed fairly, effectively and promptly, with the Ombudsman able to examine the whole record of what the landlord knew and did.
Data (Use and Access) Act 2025	Section 80, in force 5 February 2026, permits solely automated decisions with significant effects only where four safeguards are met: inform the person, allow representations, provide genuine human intervention, and allow the decision to be contested.

Why section 80 matters here specifically

Section 80 replaced Article 22 of the UK GDPR and moved solely automated decision-making from prohibition to a safeguards regime. A decision is solely automated where there is no meaningful human involvement, and what counts as meaningful has not yet been defined.

For a landlord the exposure is not in hazard detection, where a person still decides. It is in the adjacent processes where automation is most tempting and least visible: arrears prediction, allocations, tenancy sustainment triage, and prioritisation of who gets a survey first. The Leeds research names arrears prediction explicitly as a route to maladministration affecting a tenant.

Special category data — which in this sector means health and vulnerability information — remains subject to stricter control. A great deal of what makes a hazard urgent is precisely that kind of data.

Sources: MHCLG; Regulator of Social Housing consumer standards; Housing Ombudsman Complaint Handling Code; Data (Use and Access) Act 2025, section 80.

What can be done now

Seven things that are deployable under current duties, ordered by regulatory friction, lowest first.

01	Awareness detection across every channel	Finding the mention of damp in an arrears call, a visit note, a text message or a contractor's report. The highest-value use in this sector, because it maps directly onto the legal trigger.
02	Triage against the statutory clocks	Categorising a report as emergency, significant, or out of scope, and starting the correct timer. A person still makes the categorisation; the system makes sure it happens and is recorded.
03	The evidence trail	Assembling, for any property and hazard, when awareness began, what followed and what the tenant was told. Built for an Ombudsman investigation rather than for a dashboard.
04	Stock condition data remediation	Reconciling survey records, repairs history, complaints and compliance data into one account of a home. Unglamorous, and the prerequisite for everything else.
05	Surveyor and inspector assistance	Drafting the written summary the tenant must receive within three working days, from the inspector's own findings, in language the tenant can act on.
06	Complaint and vulnerability signals	Detecting the complaint about to escalate and the household that needs a different response — turning a regulatory expectation into an early-warning system.
07	Contractor and TMO oversight	Seeing what agents and managing organisations know, given that in law their awareness may be the landlord's awareness.

THE COMMON FEATURE

None of these decides whether a hazard exists, or how serious it is. Each makes sure that a person can decide, in time, with the right information in front of them, and that the decision leaves a record. That is why they are defensible today — and why they build the governance habits needed before anything more ambitious.

Three levels of accountability

Assistive, augmentive, adaptive – defined by who answers for the outcome, not by how clever the system is.

LEVEL ONE	
Assistive	
The system finds, summarises and surfaces. The surveyor or housing officer decides. Accountability is unchanged, and almost all defensible value in this sector sits here today.	
LEVEL TWO	
Augmentive	
The system proposes a hazard category and the applicable timeframe, with its reasoning, inside defined bounds. A person confirms, overrides or escalates, and the override is recorded. The review has to be demonstrably meaningful – which is both the section 80 test and the standard an Ombudsman investigation will apply.	
LEVEL THREE	
Adaptive	
The system prioritises and routes work across the stock within a defined envelope, adapting as conditions change. Oversight moves from the individual decision to the envelope. Accountability moves to whoever sets and monitors that envelope – which makes it a board decision rather than a service one.	
Near, medium and long term	
HORIZON	WHAT BECOMES POSSIBLE
Now before 30 November	Awareness detection across channels, triage against the statutory clocks, and the evidence trail. Stock data reconciliation started, because everything else depends on it. Written summaries drafted from the inspector's findings.
Next 12–36 months	Hazard categorisation proposed by the system inside defined bounds, with human confirmation and the override captured. Predictive condition modelling – once the underlying record is good enough to carry it, and not before.
Later 36 months +	Prioritisation and routing of planned work across the stock under a board-set envelope, with assurance reporting built in rather than retrofitted.
AN HONEST CAVEAT	
No UK landlord is publicly operating at the adaptive level, and the sector's own research found most current AI use is staff writing letters and generating minutes. The third horizon is a reasoned projection, not an observation.	

The number everyone quotes

And what it actually says.

The sector's best-known AI project set out to predict which homes were at risk of damp and mould. A council housing organisation of around 21,000 homes worked with a software supplier, using property condition records, maintenance history, prior damp and mould complaints, and environmental factors including local flooding and weather patterns.

The figure quoted across the sector is 98% accuracy. The supplier's own published case study is titled 70–97%. The reason for the range is that accuracy was high where the data was high quality, and fell to around 70% where the information was incomplete.

WHY THE RANGE MATTERS MORE THAN THE HEADLINE

The gap between 97% and 70% is the argument of this document. The model works when the data is good. The regulator has said, in judgement after judgement, that the data is not good.

Note also what the source is. This is a supplier case study naming its client — a materially higher standard than an anonymous vendor claim, and materially lower than an independent evaluation. There are no independent UK benchmarks for AI in social housing repairs. Anyone offering you one should be asked where it came from.

What to measure, before deploying anything

- **Time from awareness to investigation**, and from awareness to made safe — measured against the statutory timeframes, not against internal targets.
- **Detection rate** — hazards identified through channels other than a repair request. If this number does not move, nothing has changed.
- **Evidence completeness** — can the full record for a property and hazard be produced on demand.
- **Written summaries issued within three working days**, as a proportion of investigations concluded.
- **Complaint and Ombudsman outcomes**, including severe maladministration exposure.
- **False positives, and their cost to a tenant** — an unnecessary inspection is an intrusion into someone's home, not a rounding error.
- **Survey backlog closed and records reconciled** — the leading indicator for everything above.

The sixth of these is the one most likely to be left out, and the one an Ombudsman is most likely to ask about.

Eight pieces of work

In the order in which they make sense.

This is written so that it could be acted on without outside help. The sequencing matters more than the labels: the first three establish where the organisation actually stands, and everything after follows from what they find.

#	WORKSTREAM	OUTPUT	DURATION
01	Readiness assessment	A scored baseline across stock condition data, awareness channels, governance, skills and the supplier and contractor estate, with prioritised gaps.	4–6 weeks
02	Use case identification and triage	Candidate uses mapped to the three levels and to hazard risk, producing a ranked portfolio and a defensible “not yet” list.	3–4 weeks
03	Regulatory and legal position paper	Awaab's Law, the consumer standards, the Complaint Handling Code and section 80, with named accountabilities and the contractor agency question resolved.	3–4 weeks
04	Board and executive governance	Decision rights, risk appetite by hazard type, escalation routes, and the assurance reporting a board must be able to evidence.	4 weeks
05	Awareness and evidence integrity	Design of the capability to prove what was known and when, across every channel including contractors and managing organisations.	4 weeks
06	Benefit realisation framework	The measures above, instrumented and baselined before deployment rather than reconstructed afterwards.	3 weeks, parallel
07	Build, buy or partner evaluation	Supplier assessment including concentration risk, exit and lock-in, and how a supplier's model would be explained to an Ombudsman.	4–6 weeks
08	Twelve-month mobilisation roadmap	Sequenced against the Phase 2 and Phase 3 dates, with decision gates and no-regrets moves first.	2 weeks

WHERE TO START

Workstreams one to three form a natural first step of six to eight weeks, and can be run without committing to any technology decision. Six to eight weeks fits inside the window before 30 November. They answer the three questions a board will ask before funding anything: what do we already have, what could we safely do, and who answers to the Ombudsman if it goes wrong.

About the author

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Neil Catton is an independent technology strategist with more than thirty-eight years of technology leadership across more than twenty UK sectors, having begun as a computer operator at British Nuclear Fuels and progressed through Oracle engineering and systems architecture into technology leadership.

He has held CTO and Director-level roles at BT, Wipro, Fujitsu, Sopra Steria and Capita. At BT he was one of three architecture directors over a practice of more than a hundred architects, and led a £1.5bn transformation programme. He was previously CISO at Capita.

His public sector experience includes CTO for Home Affairs and Criminal Justice at Fujitsu, covering the Home Office, Ministry of Justice, HM Courts and Tribunals Service, HM Prison Service and UK policing; local government technology strategy and smart infrastructure work at Capita; a probation management platform at Sopra Steria; and, currently, Group CTO/CIO advisory to the Global Consortium Group on AI and data strategy for public safety.

He now works across a fractional portfolio — fractional CTO and CIO, non-executive and board advisory, AI board briefings and readiness reviews, technology due diligence, data strategy, and interim and programme recovery.

He is the author of four books — the trilogy *The Next Evolution*, *The Cognitive Crucible* and *The Shadow System*, and the standalone *Working as Designed: Why systems that work still fail the people inside them* — and writes at *The Next Evolution*. The writing informs the advisory work, and the advisory work informs the writing.

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How this briefing was produced

Every figure in this document is traced to a regulator, a government department, an ombudsman, published legislation, named academic research, or an operator speaking on its own record. Where a claim could not be traced to one of those, it was excluded and the exclusion recorded in section one — including figures that would have made the argument look stronger. Primary documents were read in full where the figure mattered; a secondary summary was treated as sufficient to locate a fact and never sufficient to publish it.

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