

Meeting Cabinet
Portfolio Area Housing and Housing Development
Date 9 July 2025



HOUSING HEALTH AND SAFETY NEW LEGAL AND REGULATORY REQUIREMENTS

LEAD OFFICER: DENISE LEWIS

NON-KEY DECISION

1 PURPOSE

- 1.1 Stevenage Borough Council is committed to providing warm, safe and sustainable homes. This commitment is reflected in the Council's 'Making Stevenage Even Better Corporate Plan', through budget commitments and a programme of work to continue investment into current and new social housing. The purpose of this report is to set out the implications of and the Council's approach to meeting new legal and regulatory requirements in respect of housing health and safety hazards. A number of actions are proposed, which are to be implemented through a phased approach from October 2025.
- 1.2 The report also advises on the proposed introduction of of electrical safety regulations for the social housing from November 2025 and the actions being taken to ensure compliance.

2 RECOMMENDATIONS

- 2.1 To note the new legal and regulatory requirements in relation to housing health and safety hazards as set out in the Social Housing Regulation Act

2023 which are due to be implemented by way of secondary legislation with the initial phase to come into effect from 25 October 2025.

- 2.2 To note the planned introduction of new electrical safety standards for the social housing sector in November 2025.
- 2.3 To endorse the work being carried out to ensure compliance with the new requirements in relation to damp, mould and condensation and all types of emergency hazards.
- 2.4 To note that the Executive Housing Working Group (EHWG) will receive regular updates on compliance with the new housing health and safety legal requirements both prior to and following their introduction in October 2025. These updates will include implications of the planned widening of the scope of the new legal requirements during 2026 and 2027 and actions required to ensure compliance once known.
- 2.5 To approve the amended Repairs and Maintenance Policy as attached at **Appendix 1**.
- 2.6 To delegate authority to the Strategic Director (Richard Protheroe) to agree any further minor changes to the Repairs and Maintenance Policy and/or Damp and Mould Policy after consultation with the Housing Portfolio Holder.
- 2.7 To note the potential resourcing implications for the proposed extension of the new legal and regulatory requirements to other Housing Health and Safety Rating System (HHSRS) hazards in 2026 and 2027.

3 BACKGROUND

- 3.1 The Making Stevenage Even Better Corporate Plan 2024-27 includes a commitment to maintaining good quality homes. The Regulator of Social Housing (RSH) inspection against the Consumer Standards in September 2024 recognised the work the Council already does to ensure tenant's homes are safe and well maintained through the C2 grading awarded. The Council is fully committed to doing the right thing to support tenants and residents, and being a C1 social housing landlord and, in that context, the new legal housing health and safety requirements outlined in this report are to be welcomed.
- 3.2 Following the tragic death of 2-year-old Awaab Ishak in December 2020 because of prolonged exposure to damp and mould in his social rented home in Rochdale the Social Housing Regulation Act 2023 provides for the implementation of 'Awaab's Law' by effectively inserting into social housing tenancy agreements an implied term that will require landlords to comply with new requirements, as set out in detail through secondary legislation.
- 3.3 A consultation on the key proposals to be included within Awaab's Law was carried out between 9 January and 5 March 2024. The Ministry of Housing, Communities and Local Government (MHCLG) confirmed in February 2025 that Awaab's Law will come into place in a phased approach as set out in the table below. The phased introduction of Awaab's Law is designed around a 'test and learn' approach to ensure that the reforms are delivering benefits for tenants.

Timeline	New Legal and Regulatory Obligations
October 2025	Address the following: 1. Damp and mould hazards that present a significant risk of harm to tenants within fixed timescales. 2. All emergency repairs including but not limited to damp and mould hazards as soon as possible and within no longer than 24 hours.
2026	Requirements will be expanded to a wider range of hazards including: - excess cold and excess heat - falls - structural collapse - fire, electrical and explosions - hygiene hazards.
2027	Requirements will extend to include all remaining hazards as defined by the HHSRS (excluding overcrowding). The full list of hazards can be found in schedule 1 to the Housing Health and Safety Rating System (England) Regulations 2005.

- 3.4 The HHSRS is a risk-based evaluation tool to help identify and protect against potential health and safety related risks and hazards introduced under the [Housing Act 2004](#) and applies to residential properties in England and Wales.
- 3.5 A hazard is any risk of harm to the health or safety of an actual occupier of accommodation that arises from a deficiency in the dwelling.
- 3.6 Category 1 hazards are those where the most serious harm outcome is identified, for example, death, permanent paralysis, permanent loss of consciousness, loss of a limb or serious fracture. If a hazard is less serious or less urgent, this is known as a category 2 hazard.

4 CONSIDERATIONS

- 4.1 On 25 June 2025 in a letter received from Matthew Pennycook MP, Minister of State for Housing and Planning it was confirmed that the regulations had been laid on that date to enable introduction of phase 1 of Awaab's Law from 25 October 2025.
- 4.2 This initial phase will require social landlords to investigate and fix dangerous damp and mould hazards within set time periods as well as repair all types of emergency hazards within 24 hours. Social landlords who fail to comply face

being taken to court by tenants who will be able to hold them to account by taking legal action for a breach of contract.

4.3 The key provisions within the final proposals reflect feedback provided through the Government's consultation process and are summarised as follows:

1. Within 10 working days of becoming aware of a potential hazard investigate whether such a hazard exists.
2. Produce a written summary of the findings of the investigation (in most circumstances) and provide this to residents within 3 working days of the investigation concluding.
3. If the investigation finds that a hazard presents a significant risk of harm to the health or safety of a resident, the social landlord must, in most circumstances, within 5 working days of the investigation concluding, make the property safe (using temporary measures if necessary) and begin any other work needed to stop the problem coming back as soon as possible, and no later than 12 weeks after the end of the investigation. The social landlord must satisfactorily complete repair works within a reasonable time period.
4. In an emergency situation, investigate and action any emergency repairs as soon as reasonably practicable and, in any event, within 24 hours.
5. If the property cannot be made safe within the specified timescales for Awaab's Law, offer to arrange for the residents to stay in suitable alternative accommodation, at the social landlord's expense, until it is safe to return.

Examples of an 'emergency hazard' as set out in the consultation document include:

- gas leaks.
- broken boilers.
- lack of water supply.
- electrical hazards such as exposed wiring.
- significant leaks.
- broken external doors or windows that present a risk to home security.
- prevalent damp and mould that is impacting a resident's ability to breathe.

4.4 Awaab's Law implements significant changes for social landlords and all frontline staff, not just Repairs teams, will need to familiarise themselves with the 28 relevant HHSRS hazards, as well as ensuring that they can identify an emergency repair under the new legislation. Emergency hazards will need to be prioritised and escalated appropriately.

4.5 Achieving required response times and being able to evidence compliance with the new requirements will necessitate clear and accurate records to be

maintained of all interactions with tenants and contractors regarding any hazards which will be challenging.

- 4.6 All attempts at access will need to be documented. Whilst it will be important to understand tenants' concerns and individual circumstances including any vulnerabilities it will be important to take a robust approach so that inspections and subsequent repair work can proceed. Where access is denied, or a tenant fails to respond to requests, access injunctions will need to be considered.
- 4.7 The new requirements are likely to lead to further pressure on Repairs and Maintenance services and associated budgets.

5 IMPLEMENTATION PLAN

- 5.1 In relation to Damp and Mould hazards having a dedicated team responsible for managing such cases mitigates the potential pressures and risk of non-compliance. However, the service is currently reliant on agency staffing resources and as presents a risk a transition to a permanent staffing structure is in progress. A review of processes and resourcing has also taken place to ensure that the prescriptive timescales for carrying out investigations and commencement of works can be met. In 2024/25 the performance targets were aligned with those expected to be introduced under Awaab's Law.
- 5.2 The following table summarises the various actions and activities that have been completed or are planned to ensure SBC are well prepared for the implementation of Awaab's Law in relation to Damp and Mould:

Activity/Action	Description	Status
1. People	Conclude recruitment to vacant and agency filled roles in the Damp and Mould team to ensure a permanent staffing establishment is in place to deliver and embed improvements.	Estimated completion 31 July 2025
	Recruit to an additional 1 x FTE Business Support Officer role to ensure robust and up to date performance data is available to demonstrate compliance. This post is to be funded within existing budgets.	Estimated completion 31 July 2025
	A programme of HHSRS training delivered for all front-line teams.	Completed 2024/25
	HHSRS training to be included on induction plan for new starters.	2025/26
	Mandatory refresher training to be provided for all relevant staff at an agreed frequency.	2025/26
2. Processes	Review and update processes to reflect	Estimated

Activity/Action	Description	Status
	target timescales for completion of: - Inspections - Issuing a report to the tenant - Completing works.	completion 31 July 2025
	A workshop with relevant staff held on 15 May to identify issues within the current processes and an action plan developed. Follow-up workshops planned to finalise processes and embed change.	Estimated completion 31 July 2025
	No-access process in place across the wider Housing service which has been informed by relevant teams.	Completed
3. Procurement	Appoint support contractors to carry out specialist damp and mould related works. A report on the procurement of support contractors for Repairs and Voids was presented to Cabinet for approval in February 2025. The associated contract awards were approved by the Strategic Director (Richard Protheroe) in March 2025 and mobilisation commenced in late May/early June 2025.	Completed
4. Policy	The Damp and Mould Policy has been reviewed and an updated version is available on the website Damp, Condensation and Mould	Completed
	However, the Policy will be further reviewed to ensure it is consistent with the secondary legislation and associated guidance.	In progress
	The current Repairs and Maintenance Policy was approved by Cabinet in December 2024. In light of Awaab's Law and in response to some recent Housing Ombudsman Service determinations the Policy has been updated to include the following:	Completed

Activity/Action	Description	Status
	1. Definition of a routine repair and where a repair falls outside of that definition the target timescale(s) for completion. 2. Reference to vulnerabilities being reflected in the assessment of the priority to be awarded to a repair. An amended version of the Policy which highlights the proposed amendments is attached as Appendix 1 for approval. The Policy will be further reviewed to ensure it is consistent with the secondary legislation and associated guidance.	In progress
5. Performance	In 2024/25 Damp and Mould KPI's were introduced as part of the corporate quarterly performance suite. The KPI's reflected the target timescales expected to be introduced under Awaab's Law. Some data integrity issues have been identified due to historic inspections not being closed and/or updated in a timely manner.	Completed
	For 2025/26 the KPI definitions and parameters are being reviewed to ensure reporting reflects current performance and is aligned with the prescribed target timescales as set out in the secondary legislation.	To be agreed by Cabinet in July 2025
6. Technology	To enable inspection reports can be provided to tenants within the 3 working day target following an investigation/inspection an app is being utilised as an interim solution.	Completed
	In the longer term the plan is to have a system-based solution which will enable a case management approach to be more effectively implemented in accordance with the recommendations of the CSC following their scrutiny review of damp and mould. This is included on the Housing Systems road map which will be implemented once	Estimated completion 2026/27

Activity/Action	Description	Status
	the NEC migration to the Cloud project has been completed and the necessary system upgrades carried out.	

- 5.3 Whilst planning for the implementation of Awaab's Law in respect of Damp and Mould is well underway performance in Q1 of 2025/26 has been impacted by capacity issues due to agency staff leaving. New interim cover arrangements have been put in place pending completion of the recruitment processes referred to above.
- 5.4 With regards to all types of emergency hazard the Repairs and Maintenance Policy already includes a target for emergency repairs to be completed within 24 hours.
- 5.5 However, following the publication of the supporting guidance the Repairs and Maintenance Policy and associated procedures will be further reviewed and staff made aware of any changes needed to ensure compliance. This will include how we record and monitor such repairs to ensure that we can evidence and report on compliance as required.
- 5.6 As referenced in the summary table above the Repairs and Maintenance Policy has been reviewed and it has been identified that it would benefit from the inclusion of a definition of 'routine' repairs which can be completed within 20 working days and 'other' repairs which will have longer timelines for completion for reasons as set out in the proposed definitions.

Repair priority category	Definition
Routine	Routine repairs are completed within 20 working days if it causes only minor inconvenience and tenants can reasonably live with for a period and will have no impact on the health and/or safety of a person or property if completed within 20 working days. Examples of routine responsive repairs to tenant properties include: • ease and adjust windows or doors • bath panel repair/replace • non urgent roof leak or defective roof covering • door entry phone not working (except in Independent Living) • mechanical extractor fan not working • single light failure in communal areas • re-glazing in communal areas following making safe • repairs to communal TV aerials

Repair priority category	Definition
	• blocked or broken gutters or downpipes • remedial works to wall/ceiling plaster and finishes (if safe).
Other	A repair that does not cause immediate inconvenience or pose any health and/or safety risk to tenants or the public but cannot wait for programmed maintenance including: Complex repairs: • Special or bespoke materials such as windows and doors are required, and these are only supplied by a specific manufacturer with a long lead-time and/or delivery period. • Specialist work is required which requires further investigation such as dampness or invasive structural repair, telecommunications, drainage faults that require extensive excavations. • The repair is a one-off major component repair or replacement, or higher value works that are subject to contract procedure rules, for example the replacement of a roof covering or repairs that involve utility companies (electricity, gas, and water). Planned repairs: can consist of a replacement rather than a repair of a component, examples include: • Fencing repairs or replacement • Bricklaying work • Renewing joinery • Plastering large areas • Kitchen or bathroom full or partial replacements Small works: non-urgent repairs which can be undertaken in batches, to ensure that the Council can secure the best price for the works. Examples include: • Repairs to footpaths, steps, etc. where there is no immediate health and safety risk. • Remedial works to the external fabric of the building such as render. • Rising damp treatments • Gutter clearance and/or maintenance • Repairs to fencing, gates that are near busy or main roads. Specialist repairs and complete replacements may take longer due to the need to measure, source, and manufacture specific components or equipment. Changes in regulations may also require extra building

Repair priority category	Definition
	work. Repairs in this category will be completed within a target timescale of between 12 and 26 weeks depending on the nature of the works – tenants will be advised of expected timeline for completion and kept up to date on progress.

- 5.7 To ensure there is an explicit link between the repairs category allocated and the needs of the tenant it is also proposed that the following wording is inserted into the Repairs and Maintenance Policy:

There may be instances (such as a disability or vulnerability) where the repairs category applied should be enhanced. This will be assessed on a case-by-case basis and consideration will be given to the individual circumstances and the repair.

In assigning the repair priority, the effect of delay on particular occupants should be considered. For example, a repair that may normally be categorised as routine should be upgraded to urgent if an occupant has a vulnerability such as age or ill health where a delay could have a particularly adverse effect.

- 5.8 There may be other amendments required to policies to ensure these are aligned with the regulations as laid down and/or supporting guidance in which case it is proposed that these be agreed by the Strategic Director (Richard Protheroe) after consultation with the Housing Portfolio Holder.
- 5.9 There is already a process in place for capturing and monitoring work to address notified HHSRS category 1 and 2 hazards. This process will, however, need to be reviewed to enable the relevant priority to be attached to hazards and associated works such that hazards can be addressed within the required timeframes. An HHSRS hazard can be reported from various sources including a tenant, a member of staff or a contractor.

6 CONSULTATIONS

- 6.1 The Community Select Committee (CSC) carried out a scrutiny review of how the Council manages damp and mould issues in its homes in 2017 which resulted in a new Policy being adopted in 2020, the appointment of specialist contractors and a new case management approach was proposed to enable more effective handling of damp cases and new contract specifications to take a holistic approach.
- 6.2 The CSC have since received updates on progress with improvements to the management of damp and mould cases the most recent being in January 2023 and November 2024.
- 6.3 A further update has been requested by the CSC for inclusion on their programme for the current municipal year. It is proposed that this be

scheduled for September 2025 subject to the CSC agreement for inclusion on their work programme at their meeting on 3 July. This will provide an opportunity for the CSC to consider progress against implementation plans and assess the Council's readiness for implementation of Awaab's Law in October.

- 6.4 A draft of this report was included on the agenda for the Executive Housing Working Group (EHWG) meeting on 24 June.
- 6.5 The EHWG will continue to receive updates on progress with the implementation plans for Awaab's Law to provide assurance on the effectiveness of actions that have and/or will be taken to ensure compliance with these new legal and regulatory requirements. These updates will include implications of and plans to ensure compliance with the extension of the scope of Awaab's Law to other hazards during 2026 and 2027 as and when details are made available.

7. ELECTRICAL SAFETY

- 7.1 In the letter received on 25 June 2025 it was also confirmed that following a consultation in 2022 new electrical safety standards are to be introduced for the social housing sector from November 2025. These new standards will mean the existing best practice of carrying out an electrical safety check every five years becomes a legal requirement and mirror regulations already in place in the private rented sector.
- 7.2 There are no significant implications arising from the introduction of the new electrical safety standards as SBC has a 5-year electrical safety testing programme in place with an associated budget. However, the guidance published alongside the new regulations will be reviewed to ensure that SBC is fully compliant and can demonstrate such compliance.

8 REASONS FOR RECOMMENDED COURSE OF ACTION AND OTHER OPTIONS

- 8.1 The Regulator of Social Housing (RSH) Consumer Standards set out expectations on health and safety, repairs and providing homes that are decent, safe and well-maintained. Social landlords (stock owning local authorities and housing associations) are required to inform the RSH of any material actual or potential non-compliance with the consumer standards. This would include any breaches of Awaab's Law. The implications for SBC of the implementation of Awaab's Law were assessed in advance of the secondary legislation being laid before Parliament to ensure that SBC is well placed to comply with the new legal requirements in relation to the management of damp and mould cases and dealing with emergency hazards of all types.
- 8.2 Following the letter received from the Matthew Pennycook MP, Minister of State for Housing and Planning on 25 June announcing that the regulations to introduce phase 1 of Awaab's Law had been laid alongside publication of guidance to support social landlords with implementation preparations

outlined in this report are being reviewed to ensure these are aligned with the new legal and regulatory requirements. Further updates will be provided to the Executive Housing Working Group (EHWG) to ensure effective oversight is provided prior to and post implementation.

- 8.3 The widening of the scope of the new legislation during 2026 and 2027 will mean the Council will need more oversight and likely require more officers to be able to demonstrate compliance. A growth bid will be submitted once additional resourcing needs are known which will be informed by experience of the implementation process for the initial phase of introduction and learning from others to ensure emerging best practice is embedded alongside compliance.
- 8.4 The planned introduction of electrical safety standards from November 2025 will place current best practice on a statutory footing. The Council is well placed to demonstrate compliance with these new regulations with a related KPI included in the current corporate performance suite which is reported to Cabinet on a quarterly basis.

9 IMPLICATIONS

Financial Implications

- 9.1 The estimated additional costs associated with implementation of the initial phase of Awaab's Law from October 2025 are to be met within existing budgets. These include the estimated cost in 2025/26 of an additional FTE business support role which will be met within the approved budget through a virement or underspends within the wider service staffing budgets due to vacancies.
- 9.2 The planned widening of the scope of Awaab's Law to the other HHSRS hazards over the next 2 years will mean that the Council needs more oversight of compliance, and this will likely require additional staffing resource, for example surveying and/or business support roles. A growth bid will be submitted once detailed requirements are known.

Legal Implications

- 9.3 The new legal and regulatory requirements to be introduced through Awaab's Law in a phased approach from October 2025 will enable tenants to hold social landlords to account through the introduction of a statutory framework for the completion of repairs within set timescales. The RSH will also expect landlords to demonstrate compliance through the Consumer Standards.
- 9.4 The introduction of electrical safety standards for social housing will place current best practice on a statutory footing and mirror those already in place within the private rented sector.

Risk Implications

- 9.5 The key risks are summarised in the table below:

Risk Description	Rating before mitigations	Mitigations	Rating after mitigations
Insufficient staffing capacity and skills to ensure compliance with new legal and regulatory requirements	Medium	Review of staffing resources in Damp and Mould team completed. Additional 1 x FTE role to be established in the Business Support team funded within the 2025/26 budget. Recruitment to vacant and agency filled roles in progress.	Low
Policies and processes do not align with new statutory requirements	Medium	All related policies have been reviewed and updated as appropriate as set out in this report.	Low
Lack of staff awareness and understanding of HHSRS hazards	Medium	Staff training on HHSRS was carried out with all front-line teams in 2024/25. Further training will be arranged for new starters and refresher training will be provided on an agreed frequency which will be mandatory for all staff in relevant teams.	Low
Inability to demonstrate compliance with new statutory timescales for completion of repairs	Medium	KPI's introduced from 2024/25 which track performance against the proposed new statutory timescales. These will be reported to Cabinet as part of the quarterly performance report.	Low

Risk Description	Rating before mitigations	Mitigations	Rating after mitigations
Additional costs associated with an increase in legal claims against the council as ambulance-chasing solicitors may look to take advantage of the enforcement powers available to tenants for failure to meet the new statutory timeframes.	Medium	Effective implementation of and compliance with Awaab's Law to avoid potential legal claims against the Council. MHCLG are working with the Ministry of Justice to tackle claims farming on housing disrepair cases as it is recognised that this is a rising concern for landlords and tenants.	Medium

Policy Implications

- 9.6 The following related policies have been and will be further reviewed as necessary to ensure alignment with the new legal and regulatory requirements as set out in regulation laid on 25 June 2025:

Policy	Date Approved	Comments and actions required
Repairs and Maintenance	December 2024	Proposed minor amendments: - Include a definition of 'routine' repair and for types of works which fall outside of that definition a target timescale for their completion. - Make clear that vulnerabilities will be taken into consideration when assigning the priority for a repair. For example, upgrading the priority where a delay could have an adverse impact on the individual due to age, disability or medical condition. An updated version of the policy which incorporates the above is attached for

Policy	Date Approved	Comments and actions required
		approval at Appendix 1 . Should any further amendments be required to ensure this policy is consistent with the secondary legislation and associated guidance as published on 25 June 2025 it is proposed that delegated authority be awarded to the Strategic Director (Richard Protheroe) to approve such changes after consultation with the Housing Portfolio Holder.
Damp and Mould	April 2024	The updated Policy reflects the proposed new legal and regulatory requirements as set out in the Government consultation document. However, following the publication of the regulations and associated guidance on 25 June 2025 checks will be made to ensure full alignment with the detailed provisions. Should any further amendments be required it is proposed that delegated authority be awarded to the Strategic Director (Richard Protheroe) to approve such changes after consultation with the Housing Portfolio Holder.
Decants	February 2025	The updated Policy aligns with legal and operational requirements.

Climate Change Implications

9.7 None.

Staffing and Accommodation Implications

9.8 The proposed introduction of Awaab's Law has necessitated a review of staffing resources within the Damp and Mould team to ensure that the Council is well placed to demonstrate compliance. As maintaining accurate records and communicating well with tenants will be critical to successful implementation it has been agreed to increase the level of business support within the Repairs and Voids service by 1 x FTE. An appointment to the proposed new role is anticipated to be made ahead of the implementation date.

Equalities and Diversity Implications

- 9.9 The government published an equalities impact analysis with the consultation document which, based on the demographic data available on social renters, indicates that any policy affecting the social rented sector as a whole is likely to have a particular impact (whether positive or negative) on women, older people, people with disabilities and people of ethnic minorities, because these groups are all disproportionately likely to live in the social rented sector.
- 9.10 Awaab's Law is expected to have a net positive beneficial impact on social housing tenants, and as such will have a disproportionately positive impact on those groups from protected characteristics which are disproportionately represented in social housing in general.
- 9.11 There is no evidence to suggest that the new regulations would have a substantial adverse equality impact on any of the protected groups.

Service Delivery Implications

- 9.12 The implementation of Awaab's Law has required processes to be reviewed and resources aligned with the new statutory timescales for completion of repairs.
- 9.13 All frontline services will need an awareness of the new statutory responsibilities and ensure that any relevant hazards are reported so they can be dealt with in accordance with the internal referral processes.
- 9.14 It will not only be important to comply with the new statutory timeframes but evidence compliance so ensuring robust records and reporting is in place are key elements of the implementation plan.

Information Technology Implications

- 9.15 An application is being used to support with the inspection of damp and mould cases and production of the report on outcomes that has to be provided to the tenant within 3 working days of an investigation being concluded. This is an interim solution pending a system-based option being investigated once the housing system (NEC) has been migrated to the Cloud and upgraded to the latest version.
- 9.16 For reporting purposes NEC is already being used to hold data on inspections and works completions.

BACKGROUND DOCUMENTS

1.1 All documents that have been used in compiling this report, that may be available to the public, i.e. they do not contain exempt information, should be listed here:

- BD1 [Damp and Mould Policy - April 2024](#)
- BD2 [Awaab's Law: Consultation on timescales for repairs in the social rented sector - GOV.UK](#)
- BD3 [Awaab's Law: Consultation on timescales for repairs in the social rented sector - government response - GOV.UK](#)
- BD4 [Social Housing quality reforms: Letter to chief executives and council leaders - GOV.UK](#)

APPENDICES

- 1 Amended Repairs and Maintenance Policy