

Demography Questions

1. **In which capacity are you completing these questions?** (Select all that apply)
 - Charity (providing support services and advice)
2. **If responding as an individual, where do you live?** (Select one)
 - Not applicable
3. **Landlords and estate/letting agents only: Where are the majority of properties you let located?** (Select one)
 - Not applicable
4. **Landlord only: How many rental properties do you own or manage?** (Select one)
 - Not applicable
5. **Landlord only: Which of these options best reflects how you would describe yourself or organisation?** (Select one)
 - Not applicable
6. **Landlord only: Do you provide supported housing?**
 - Not applicable
7. **Landlord only: Do you provide temporary accommodation?**
 - Not applicable
8. **Tenant only: Is anyone living in your property under the age of 5?**
 - Not applicable
9. **Tenant only: Is anyone living in your property over the age of 65?**
 - Not applicable
10. **Tenant only: Do you live in a House in Multiple Occupation (HMO)?**
 - Not applicable

Question 11:

Do you agree that age should be removed from the definition of disrepair?

Yes

Question 12:

Do you agree that the thresholds used to define disrepair for each component should be updated to reflect a more descriptive measure as proposed?

Yes

Question 13:

Do you agree that the number of items or components which must require major repairs for the component to be considered in disrepair should be reduced?

Yes

Question 14 (Landlords only):

Do you think that removing age as a consideration from disrepair would lead to less planned maintenance of your properties and more reactive repairs carried out in response to issues raised by tenants?

Not applicable

Question 15:

Do you agree that kitchens and bathroom components should be considered as “key” i.e. one or more in disrepair would cause a property to fail the DHS?

Yes

Question 16:

a) Do you agree with the proposed list of building components that must be kept in good repair?

Yes

b) If you have any views on this specific question you would like to share, please do so here

The proposed list is comprehensive, and we welcome the clarity it provides. However, it is essential that requirements are applied in a way that is proportionate and practical. Overly prescriptive detail could risk turning the DHS into a 'tick-box exercise' rather than a meaningful measure of housing quality. For example, items like external lighting or bin store doors should be judged in context, with compliance linked to timely repair rather than continuous perfect condition which could detract significant resources away from other priorities.

Instead, we suggest that the additional requirements are considered as proportional elements – for example, instead of non-compliance if 2 or more external lightbulbs are not working, compliance could be judged according to the overall level of lighting provision in external areas and the promptness of repairs. This would ensure that requirements focus on outcomes for residents, rather than rigid thresholds, and avoid penalising housing providers where issues are minor, temporary, or beyond their immediate control. A similar approach could apply to other components such as bin store doors or fire exit signs, where the standard should reflect reasonable landlord responsibilities rather than creating unrealistic continuous compliance obligations.

We also emphasise the importance of flexibility for heritage properties, where certain modern interventions may not be possible or appropriate. Equivalent outcomes should be allowed through sensitive alternatives, and heritage-sensitive guidance for listed buildings and conservation areas should be provided.

Question 17:

Do you agree with the proposed “key” components and “other” components as listed?

No

Question 18:

a) Do you agree that the suggested additional components that relate to the public realm (boundary walls, curtilage, pathways and steps, signage, external lighting, bin stores) should only apply to the social rented sector?

Yes

b) If you have any views on this specific question you would like to share, please do so here

Whilst we agree these requirements are more suited to the social rented sector, where providers are often responsible for wider estate management - however, we recognise concerns about proportionality and practicality raised by providers. Requirements relating to elements such as boundary walls, lighting, or bin store doors should be framed to focus on outcomes for residents and allow for reasonable timeframes for repair, rather than mandating continuous compliance. For almshouses and other charitable housing providers, similar principles are often voluntarily upheld to ensure residents have safe, dignified, and accessible external spaces, but it is important that compliance expectations remain achievable and proportionate across the sector.

Question 19:

If you have any views on these specific questions you would like to share, please do so here

We support the principle of updating the DHS to reflect modern expectations of housing quality, but stress that heritage and charitable housing providers may face unique challenges. Guidance should therefore explicitly recognise the need for flexibility in meeting requirements where listed building status, planning restrictions, or conservation values apply. This should not mean lowering standards but allowing different ways of achieving the same outcomes. A “best practice” set of case

studies would help housing providers understand how others in similar circumstances have delivered compliance.

Proposal 2: Facilities and services (Criterion C)

Question 20:

a) Do you agree that under the new DHS landlords should be required to provide at least three out of the four facilities listed?

Yes

b) If you said No, are there any of the facilities that you would prioritise?

N/A

c) Do you believe that the “multiple choice” nature of Criterion C (i.e. landlords must provide at least three out of the four facilities listed) could lead to any practical implications for tenants, landlords and/or organisations responsible for regulating/enforcing the standard?

Yes

If you responded Yes, please provide supporting details.

There is a risk that housing providers may choose to prioritise the least costly facilities rather than those of greatest benefit to tenants. Clear guidance and regulatory oversight will be essential to ensure housing providers make decisions in residents’ best interests. For older residents, facilities like noise insulation and accessible communal areas can have particularly positive impacts. Without safeguards, some residents may be left without the most essential facilities, which would undermine the policy intent.

d) If there is anything else you would like to add on this specific proposal, please do so here

Flexibility is helpful, but there should be safeguards to ensure all residents have access to the most essential facilities over time. For example, bathrooms and kitchens should never be omitted in practice. Regulators should monitor how housing providers apply the “three out of four” rule to ensure fair and consistent outcomes across the sector.

Proposal 3: Window restrictors (Criterion C)

Question 21 (Landlord only):

Do you currently provide child-resistant window restrictors that can be overridden by an adult on dwellings with windows above ground floor?

not applicable

Question 22:

a) Do you agree with the proposal that all rented properties must provide child-resistant window restrictors that can be overridden by an adult on all windows which present a fall risk for children (as defined above including a recommended guarding height of 1100mm)?

Yes

b) If there is anything else you would like to add on this specific proposal, please do so here

We support this as an important safety measure. While almshouse residents are typically older, safeguarding children in intergenerational or visiting contexts is vital. Implementation should take account of building types where restrictors may need specialist fitting, and guidance should recognise the constraints of heritage buildings where window design may differ from modern standards.

Existing best practice should be updated. In addition, if any conflict arises with existing Care Quality Commission or Health and Safety Executive advice regarding window restrictors in health and social care settings, it will be important that government guidance sets out clearly which advice takes precedence and where regulatory responsibility lies.

Proposal 4: Home security measures (Criterion C)

Question 23:

The following questions relate to additional home security requirements in the DHS:

- a) Do you think that home security requirements in relation to external doors and windows are sufficiently covered in the Decent Homes Standard? No**
- b) If you responded No to part a), should we consider additional security requirements in relation to external doors and windows in the Decent Homes Standard? Yes**
- c) If you responded Yes to part b), should we consider giving landlords the option to comply with Part Q requirements in Building Regulations? Yes**
- d) If there is anything else you would like to add about the impact of introducing additional home security measures (such as challenges, costs), please provide detail here**

Security is essential for residents' sense of safety and wellbeing. However, applying additional requirements should balance cost and feasibility, particularly in heritage buildings where modern security standards may need adaptation. Government guidance should ensure proportionate, practical solutions, and should also highlight the importance of avoiding unintended consequences such as reduced natural ventilation or restricted emergency access.

In addition, older and heritage housing with care settings, including many almshouses, may not be able to comply with specific modern requirements regarding doorsets and window fittings where these would conflict with planning restrictions or listed building status. In such cases, exemptions should be permitted provided that reasonable alternative measures to ensure security have been taken. This should also apply to properties in conservation areas, where changes to the external appearance may be restricted.

Proposal 5: Suitable floor coverings (Criterion C)

Question 24:

- a) Do you think that landlords should provide suitable floor coverings in all rooms at the start of every new tenancy from an agreed implementation date?**

No

- b) If you have any views on this specific question you would like to share, please do so here**

Whilst floor coverings contribute significantly to safety, comfort, and hygiene, it must be emphasised that this policy should also balance cost and feasibility. In many cases, the wishes of the residents should be made priority as many may prefer to remove floor coverings and install their own or have uncovered flooring. If it is a resident's choice to remove or alter floor coverings, the housing provider should not be penalised.

For older residents, slip-resistant, well-fitted flooring is often necessary in preventing falls. However, support should be provided through adequate funding as any provision to mandate flooring will incur significant costs to small housing providers. Guidance should recognise the differing circumstances of housing providers and allow appropriate phasing to avoid sudden cost burdens.

Questions 25 (Landlords only): To help us better assess the impact and know more about the detail of how you currently operate in the relation to providing floor coverings, we are interested in the following:

- a) Do you provide floor coverings in any of your dwellings? Not applicable**
- b) If you responded Yes to part a) to providing floor coverings, can you provide details of costs here?**
- c) If you responded Yes to part a), in regard to responsibility of repair and maintenance for floor coverings do you: (please select one)**
 - Not applicable

d) If you answered Yes to part a) to providing floor coverings, in the dwellings you let, which rooms do you currently provide them in? (select all that apply)

- Not applicable

e) When or if you replace floor coverings in the dwellings you let, do you? (select one)

- Not applicable

f) What proportion of your new lettings do you expect would require new floor coverings (including replacements) each year?

- Not applicable

g) What proportion of your new lettings do you expect to reuse and clean existing floor coverings (rather than provide new replacements) each year?

- Not applicable

h) If floor covering were to form part of the DHS, do you agree with the proposed measurement approach for whether a dwelling passes or fails the suitable floor coverings element of the standard?

Not applicable

Proposal 6: Streamline and update thermal comfort requirements (Criterion D)

Question 26:

Do you agree with the proposal that the primary heating system must have a distribution system sufficient to provide heat to the whole home?

Yes

Question 27:

Are there other thermal comfort requirements that you think should be included in the DHS beyond current MEES proposals?

No

Question 28:

If there is anything else you would like to add on this specific topic please do so here

Adequate heating is vital for health and wellbeing, particularly for older residents vulnerable to cold. Systems should be efficient, safe, and reliable. Ventilation should be emphasised alongside heating to prevent condensation and damp. Temperature controls should also be accessible and easy to use, especially for older people.

We support alignment with wider government energy efficiency and decarbonisation goals. However, implementation must recognise the financial and technical challenges for heritage and charitable providers. Flexibility, transitional funding, and clear guidance will be crucial. Future revisions should also address overheating in summer, ensuring homes are resilient to climate change as well as winter cold.

Proposal 7: Properties should be free from damp and mould (Criterion E)

Question 29:

a) Our expectation is that, to meet the DHS, landlords should ensure their properties are free from damp and mould. Do you agree with this approach?

Yes

b) Criterion E will be in addition to the requirements under Awaab's Law as it aims to prevent damp and mould reaching a level that is hazardous. If, however, damp and mould in a property were to become severe enough to cause 'significant harm', landlords would have to comply with Awaab's Law to ensure prompt remediation and, if they do not, tenants will be able to take action in the courts. The damp and mould standard in the DHS should however help to prevent damp and mould getting that severe. Do you agree with this approach?

No

Question 30:

To ensure the standard is met, regulators and enforcers will consider whether the home is free from damp and mould at bands A to H of the HHSRS, excluding only the mildest damp and mould hazards? Do you agree with this approach?

No

Question 31:

If there is anything else you would like to add on this specific proposal please do so here.

Whilst we support the intention of the criteria, we are concerned that implementation of this policy will confuse and delay remedial work. The guidance on HHSRS assessments is highly subjective, and if housing providers are advised to act without completing these assessments, they may struggle to understand what is required to remain compliant. It also risks providers being in breach of the regulations in the assessments if they are working outside of the assessment standards. This could make it difficult for providers to understand what the regulator expects and to maintain their housing stock to this standard.

Clear enforcement guidance will be essential to ensure consistency and avoid unintended non-compliance. To prevent overlapping regulations, Awaab's Law should take precedence and support the highest standards. We would suggest that Criterion E be removed from the Decent Homes Standard or, alternatively, aligned explicitly with Awaab's Law. Adding a separate regulatory layer years after Awaab's Law comes into force is likely to confuse providers and has the potential to reduce compliance or enforcement.

Support should also be available for smaller or charitable housing providers to help them remediate issues quickly, given their more limited resources. Additional advice should cover preventative measures such as ventilation, heating, and tenant education, so damp and mould problems can be addressed before they escalate.

Section 4 – Application of the DHS to temporary accommodation and supported housing and implications for leasehold and commonhold tenants and landlords

Temporary accommodation

Question 32:

Do you agree all other aspects of the DHS in relation to bathrooms and facilities should still apply to temporary accommodation which lacks kitchen and cooking facilities and/or separate bathroom facilities?

Not applicable

Question 33:

a) Are there any other elements of the DHS which have not already been identified which are likely to be challenging to apply to temporary accommodation?

Not applicable

b) If answered yes to Q33a), please give details

Not applicable

Question 34:

Do you think the proposed DHS requirements will impact temporary accommodation supply?

Not applicable

Supported housing

Question 35:

a) Are there any challenges you foresee in applying the outlined DHS proposals in Supported Housing?

Yes

b) If you have any views on this specific question you would like to share, please provide details

Supported housing often serves highly vulnerable residents with complex needs. Standards must be applied in a way that does not inadvertently reduce supply by imposing impractical costs. Flexibility, additional funding, and tailored guidance will be important to ensure compliance without undermining the viability of provision. Any new requirements should be tested with providers of supported housing to confirm they are deliverable and sensitive to resident needs.

The Almshouse Association is also concerned that the increasing regulatory complexity in supported housing, alongside the Supported Housing Regulator requirements, the Renters' Rights Bill, and other legislation affecting care providers will add financial and administrative pressures that may render some supported housing services unsustainable.

Leasehold and commonhold

Question 36:

a) Do you agree with the proposed approach to enforcement for rented properties that are leasehold?

Not applicable

b) Do you see any unintended consequences or risks with this approach, including for resident-owned blocks?

Not applicable

Question 37:

a) Do you feel that any of the proposed policies create costs for leaseholders (including owner occupiers who live in mixed-tenure buildings) that go beyond what they would expect to cover currently in terms of repair and maintenance liabilities?

Not applicable

b) If you have any views on this specific question you would like to share, please do so here

Not applicable

Section 5 – Guidance

Question 38:

a) What information and/or topics would you like included in the proposed additional best practice guidance for social and private landlords and tenants? (Select all that apply)

Please select what you would like to include:

- **Accessibility**
- **Additional home security measures e.g. external lighting and CCTV**
- **Adaptations to climate change**
- **Digital connectivity**
- **Electrical Vehicle Charging**
- **Furniture provision**
- **Water efficiency measures**
- **Other**

b) If you have selected 'Other', please say what you would like to be included

Heritage-sensitive compliance measures - guidance should include examples of how providers based in heritage and other specialist properties can meet requirements in ways that respect conservation needs. It should also cover low-cost, practical solutions suitable for smaller housing providers and charities. This will make compliance more realistic and avoid unintended loss of housing supply from providers unable to afford inappropriate or overly-complex measures.

Question 39:

If you have any other views on this specific topic you would like to share, please do so here

Best practice guidance should be co-designed with the sector, including smaller and charitable providers. Case studies and practical examples will be particularly helpful in ensuring standards are achievable across varied housing contexts. A focus on low-cost, proportionate, and phased approaches would ensure the guidance is relevant not just for large housing associations but also for smaller housing providers and charities.

Section 6 – Implementing the Decent Homes Standard

Questions

Question 40 (All):

a) What do you think the implementation date for the DHS should be in the SRS?

Other

b) If Other – What do you think the implementation date should be? (Please select one)

Don't Know

Question 41 (All):

a) What do you think the implementation date for the DHS should be in the PRS? (Please select one)

Other

b) If Other – What do you think the implementation date should be? (Please select one)

Don't know

Question 42 (All):

a) Do you support phasing in some elements of the new Decent Homes Standard ahead of the proposed full implementation dates (2035/2037)?

Yes

b) If Yes – Which elements of the new DHS do you think should be introduced ahead of the proposed full implementation dates (2035/2037)?

We support earlier implementation where possible, provided adequate funding and transitional support is in place. Phasing in measures such as damp and mould prevention, safety standards, and heating system requirements ahead of 2035/37 would deliver earlier benefits for residents, as well as balancing obligations towards existing legislation such as Awaab's Law. However, heritage and charitable providers will require flexibility and financial assistance to achieve compliance.

Appropriate implementation dates are dependent on the final agreed DHS. If the obligations of the DHS are vast – and anticipated to require expensive changes to existing housing stock – charities and small providers should be supported in compliance by extending deadlines and providing adequate funding.

Question 43 (For SRS and PRS landlords only):

Are you confident in your ability to deliver works to meet the updated Decent Homes Standard by the proposed implementation dates (2035/2037)?

a) For Social Housing Landlords only: Within current income forecasts in the SRS?

Not applicable

b) For all Landlords: Alongside other regulatory requirements including Awaab's Law and MEES?

Not applicable

c) Please give supporting details?

Question 44 (For SRS and PRS landlords only):

Considering the need to meet both Minimum Energy Efficiency Standards and the Decent Homes Standard, do you plan to deliver savings by:

a) Prioritising measures which will both improve a property's energy efficiency and help meet the DHS?

Not applicable

b) Reducing overhead costs by programming combined works to meet both standards?

Not applicable

c) Please give supporting details

Question 45 (SRS landlords only)

Will achieving the updated Decent Homes Standard by the proposed implementation dates (2035/2037) only be achievable by reducing discretionary spending compared to your current plans? (Select one)

a) Not applicable

b) Please providing supporting detail

Question 46 (For PRS landlords and tenants):

a) Do you agree that only criterion A should be a Type 1 DHS requirement?

Not applicable (Select one)

b) If No – which other criteria do you think should be a Type 1 DHS requirement?

/ Not applicable (Select all that apply)

c) Please give supporting details

Question 47: (For All)

If there is anything else you would like to add on this specific section? If so, please do so here

Clear communication of timelines and expectations will be vital to help smaller housing providers and charities plan works – as such we would recommend that the Minimum Energy Efficiency Standard and the DHS are implemented simultaneously and without unnecessary legislative duplication. Consistency across government housing standards will also help minimise duplication of effort or expense. Implementation should be phased in line with available funding programmes to avoid pushing providers into financial difficulty.

Section 7 – Meeting the Standard

Social Rented Sector

Question 48:

a) Do you agree that providers should be given flexibility from meeting the DHS where tenants refuse access? Yes

b) Do you agree that there should be additional guidance issued by the government to provide more detail on tenant refusals? Yes

c) Do you agree that providers should be given flexibility from meeting the DHS where there are physical or planning factors preventing compliance? Yes

d) Do you agree that providers should be given flexibility from meeting the DHS for non-compliance due to sale, demolition, or planned regeneration of properties? Yes

e) If there is anything else you would like to add on this specific question please do so here.

Although all efforts should be made to support tenants in their homes, providers should not be penalised when the resident does not want to engage, does not inform the provider of disrepair, or the action is the result of an unauthorised tenant modification. Priority should instead be focused on empowering the resident and encouraging them to engage with suitable services. Flexibility for physical or planning barriers is particularly important for almshouses, many of which are listed buildings. Guidance should clearly define the circumstances under which exemptions apply to prevent uncertainty.

Private Rented Sector

Question 49:

a) Do you agree that statutory enforcement guidance should specify that local authorities should exercise discretion on enforcement when physical or planning factors prevent compliance with a DHS requirement? Yes

b) Should statutory enforcement guidance specify that local authorities exercise discretion on enforcement in situations of tenant refusal? Yes

c) If there is anything else you would like to add on this specific question please do so here.

We agree local authorities should exercise discretion where compliance is prevented by planning or tenant refusal. Statutory guidance should ensure consistent and fair application of enforcement powers. This will also prevent discouraging good housing providers from remaining in the sector. Overly rigid enforcement could reduce housing supply, which would be counterproductive to residents' interests.