

A Decent Homes Standard in the private rented sector: consultation – UK Government

Response from Propertymark

October 2022

Background

1. Propertymark is the UK's leading professional body of property agents, with nearly 18,000 members representing over 12,800 branches. We are member-led with an executive Board of practicing agents who we work closely with to ensure that we uphold high-standards of professionalism and are able to advocate for legislative change on behalf of the sector.

Questions

Question 1: In which capacity are you completing these questions?

- Tenant
 - Landlord operating as an individual or group of individuals (e.g. couple)
 - Landlord operating on behalf of an organisation
 - Letting agent
 - Local council
 - Tenant representative group
 - Landlord representative group
 - Financial institution
 - Industry body
 - Other (please specify) [free text]
2. We are responding in the capacity of a property agent representative body, with our letting agent members spread across multiple regions.

Question 2: If responding on behalf of an organisation, please specify which organisation:

3. Propertymark

Question 12: Do you support bringing in and enforcing the Decent Home Standard, as set out above, in the private rented sector?

- **Yes**
 - **No**
 - **Don't know**
4. Yes. We support the bringing in and enforcing the Decent Homes Standard in the Private Rented sector, but have concerns about the specific ways in which the Standard will be enforced, and which parties will be held accountable if breaches are identified.

Question 13: How clear is the Standard as set out?

- **Very clear**
 - **Quite clear**
 - **Neither clear nor unclear**
 - **Quite unclear**
 - **Very unclear**
 - **Don't know**
5. Neither clear nor unclear. There are elements within the Standard that leave substantial room for interpretation which will lead to inconsistent compliance. In order to ensure consistent compliance, agents and landlords will require clear definitions of the following: what constitutes "major repair", the categories of "adequate and inadequate" for Criterion C and what is a "reasonable" degree of thermal comfort. The same definitions should be provided to local authorities to ensure consistent understanding of the Decent Homes Standard.

Question 14: How difficult do you believe the Standard will be to meet?

- **Very easy**
 - **Quite easy**
 - **Neither easy nor difficult**
 - **Quite difficult**
 - **Very difficult**
 - **Don't know**
6. Neither easy nor difficult. The difficulty entirely depends on the type and value of the property. For example, there will be difficulties for landlords to meet the Standard for low-value homes. If homes require large-scale repairs or have appliances that need replacing, the cost of meeting

the Standard could be the equivalent to multiple months' worth of rent compared to higher-value property where only a portion of a single months' rent could cover the costs. This will make meeting the Decent Homes Standard difficult for landlords with fewer properties or who own low-value properties as they will not have the disposable income to invest in the property. As a result, it is likely that these landlords will sell their properties in the short-term, we will see rents rise as a result, or these properties continue to not meet the Standard.

Question 15: Currently, a property will fail the Decent Homes Standard if a 'key building component' (e.g. wall, window, roof) is both old and in poor condition. Should we change the Standard to remove 'old' so only the condition is relevant?

- Yes
- No
- Don't know

7. Yes. A key building component should only fail the Decent Homes Standard if the component is in poor condition, as the age of the component is rarely relevant. Age should not be considered unless an appliance, such as a boiler, is required to be replaced after a certain number of years according to the manufacturers' guidelines.

Question 16: Do you think that a landlord's failure to meet the Decent Homes Standards should be a criminal offence?

- Yes
- No
- Unsure/Don't know

8. No. The aim of the Standard should be to raise standards within privately rented accommodation. Enforcement should therefore focus on prevention and incentives for agents and landlords to meet the Standard. Our concern is that if enforcement largely focuses on incarceration, you could see more landlords leave the sector in the short-term and action taken against landlords being unjustly penalised for breaching standards when an alternative approach would have been more effective at raising standards. That being said, criminal prosecution should remain an option only as a last resort when breaches remain after several methods of enforcement have been pursued or when a landlord fails to respond to rent repayment orders.

Question 17: Should local councils have the option to issue civil penalties or prosecute for Decent Homes Standard offences?

- **Local councils should only issue civil penalties**
- **Local councils should only prosecute**
- **Local councils should have the option to issue civil penalties or prosecute**
- **Local councils should not be able to issue civil penalties or prosecute**
- **Unsure/Don't know**

9. Local Councils should have the option to issue civil penalties or prosecute, but we encourage that civil penalties should be pursued in most cases. This will provide Councils with a wide range of enforcement options which they can use depending on the circumstances of the breach in Standards.

Question 18: Do you think rent repayment orders should be extended to include Decent Homes Standard offences?

- **Yes**
- **No**
- **Unsure/Don't know**

10. Yes. We think rent repayment orders should be pursued in the majority of cases. Ultimately, it is the tenant(s) who suffers when their home does not meet the proposed Standard and thus, they should benefit from any action taken against those who do not meet their obligations.

Question 19: Do you think that a landlord's failure to meet their duty to keep a property at Decent Homes Standard should be included as a banning order offence?

- **Yes**
- **No**
- **Unsure/Don't know**

11. Yes. This should only be a last resort due to repeated offences or based on the severity of the offence. Guidance regarding when it is suitable to take this action should be made very clear.

Question 20: Do you think that local councils should have the discretion to make properties temporarily exempt from the duty to meet the Decent Homes Standard on a case-by-case basis (with regard to statutory guidance)?

- Yes
- **No, exemptions should exist but not at the discretion of local councils**
- **No, there should be no exemptions**
- **Unsure/Don't know**
- **Other, please specify [free text]**

12. Yes. However, while local authorities require flexibilities to make decisions at a local level, there has been inconsistencies in how current rules and regulations are applied. In order to provide consistency, while retaining flexibility at a local level, national guidelines should be produced that cover examples of when a property should be exempt. Councils should still ultimately have the final say, as they understand the needs of their local area and the specifics of each case they will be dealing with, but this should be informed by standard and detailed guidance issued to all local authorities.

Question 21: In some instances, carrying out Decent Homes Standard work or repairs without permission would put the landlord in breach of a statutory obligation, such as in the case of listed buildings. We are proposing to exempt landlords where they have attempted to obtain permission to carry out the works and been refused. Do you think it would be appropriate for this exemption to the Decent Homes Standard to be set out in legislation?

- Yes
- **No, these should be discretionary exemptions issued by the local council**
- **No, this should not be an exemption**
- **Unsure/Don't know**

13. Yes. This is appropriate since if the landlord has taken the necessary steps needed to conduct repairs but has been refused, they wouldn't be able to carry out improvements to their property. If, however, the landlord has been issued guidance on why they were refused and that they can take steps in order to obtain permission, then they should be expected to take those steps. They should not be exempt from meeting the Standard if they continue to be in breach but there are options available for the landlord to obtain permission. It is particularly important

for guidance to be issued to local authorities in this instance, to prevent landlords and local authorities from breaching current laws around listed buildings.

Question 22: Do you think local councils should have the discretion to temporarily exempt a landlord from the duty to meet the Decent Homes Standard where the landlord has bought a property with sitting tenants that does not meet the Standard?

- Yes
- No, this exemption should be set out in legislation
- No, this should not be an exemption
- Unsure/Don't know

14. Yes. As long as the landlord can provide evidence that they are currently taking steps to ensure the home meets the standard, and they have informed the tenants, they should be exempt. Local authorities should be given the discretion on what constitutes a breach if a landlord is not taking the necessary steps to meet the Decent Homes Standard, including the time that is considered reasonable to address any breach in the Standard.

Question 23: Do you think local councils should have the discretion to temporarily exempt the personal representatives of a landlord from meeting the Decent Homes Standard where a letting property is under probate?

- Yes
- No, this exemption should be set out in legislation
- No, this should not be an exemption
- Unsure/Don't know

15. Yes. We understand that letting under probate is often done on a temporary basis and it would not be in the best interests of all involved to enforce the Standard in this instance. When the property is no longer under probate, the exemptions should be lifted.

Question 24: Do you think local councils should have the discretion to temporarily exempt an incoming manager from the duty to meet the Decent Homes Standard where a landlord has either lost their HMO licence or is not fit and proper, so a new company or person is managing the property?

- Yes

- **No, this exemption should be set out in legislation**
- **No, this should not be an exemption**
- **Unsure/Don't know**

16. Yes. However, the length of time that the exemption is in place should be made clear to the incoming manager so that they can ensure the property meets the Standards without the threat of prosecution.

Question 25: Do you think local councils should have the discretion to temporarily exempt someone from the duty to meet Decent Homes Standard where they are taking over the property on a temporary basis due to the landlord being incapacitated?

- **Yes**
- **No, this exemption should be set out in legislation**
- **No, this should not be an exemption**
- **Unsure/Don't know**

17. Yes. This will prevent prosecutions against the individual taking over the property temporarily. We would also urge caution against taking action against an incapacitated landlord until they are able to respond to any initial warning. Otherwise, you risk taking a landlord to court who would have been able to resolve the breach in Standards if they were not incapacitated.

Question 26: Do you think local councils should have the discretion to temporarily exempt a landlord from the duty to meet the Decent Homes Standard where accidental damages have occurred (e.g. fires, floods, storms, etc.)?

- **Yes**
- **No, this exemption should be set out in legislation**
- **No, this should not be an exemption**
- **Unsure/Don't know**

18. Yes. Discretion should be used to understand the amount of damage that has occurred and to provide a reasonable timeframe for the landlord to resolve the breach. Otherwise, you could risk tenants living in or being unable to move back into damaged property for unreasonable periods of time.

Question 27: Do you have any further comments on exemptions from the landlord duty to meet the Standard?

19. There is currently a significant shortage of environmental health and other professionals within the industry.¹ If a landlord or managing agent is unable to meet the Standard in a given time frame but can prove they have been in contact with relevant professionals who have issued when they can deliver necessary works, they should be exempt temporarily from their duty to meet the Standard.
20. If exemptions are to be made, it is vital that guidance from central government is issued to all local authorities, with a clear communication campaign to local authorities, agents, landlords and tenants. This will prevent instances where the intent of the Standards is undermined by a misunderstanding of the enforcement procedures. Alongside guidance on exemptions, this communication campaign should apply to all aspects of the Standard, especially enforcement and accountability.

Question 28: Who do you think should be responsible for a Decent Homes Standard failure? Please select one or more responses.

- **The immediate landlord - the person who receives the rent from those living in the property. Although this person has a direct relationship with the tenants they may not have sufficient control over the property to ensure it meets the Decent Homes Standard.**
- **The person with “control” over the property - this may not be the immediate landlord if in order to comply with the Decent Homes Standard they need consent from a superior landlord. A person would have “control” if they can make decisions about the property to ensure the Decent Homes Standard is met without having to seek consent from a superior leaseholder or freeholder.**
- **The freeholder of the property or the leaseholder with a lease of more than 21 years - which party is responsible for the relevant criterion of the Decent Homes Standard will depend on the rights and responsibilities as set out in the terms of individual leases.**
- **Other [free text]**

21. The person with control over the property to make decisions which relates to compliance with the Decent Homes Standard is the person responsible. We would, however, point out that there

¹ <https://www.propertymark.co.uk/resource/a-shrinking-private-renter-sector.html>

needs to be an acknowledgement of a tenant's role and responsibility and behaviour in maintaining Standards, especially in light of the current cost of living crisis. For instance, extreme mould is often caused by the lack of ventilation and heating within a home, and landlords should not be penalised for actions their tenants make.

22. This is one of the reasons why Propertymark is arguing for prosecution to be limited, and for greater mediation to ensure that breaches can be resolved with the lowest cost for all parties involved.

23. We urge that the UK Government issues guidance for the process that tenants, landlords and agents must follow when identifying, reporting, and resolving a breach. This guidance should establish who is responsible at each step. That way, the party who has not followed this process can be held responsible. This process can be easily displayed on the Property Portal or become part of a regulated Code of Practice for letting agents.

Question 29: Do you think that landlords should use the Property Portal to register Decent Homes Standard compliance of their properties or record where there is an agreed exemption?

- **Yes**
- **No**
- **Unsure/Don't know**

24. Yes. We see no issue with this, but we urge that the Property Portal should only be accessible to current tenants and the managing letting agent. Any other party that wishes to have access to a specific landlord's Property Portal information should require approval via the regulatory body responsible for the Portal.

Question 30: Tenants only: Would you find it helpful to be able to view whether your current or prospective property had been declared Decent Homes Standard compliant by the landlord or whether an exemption was in place?

- **Yes**
- **No**
- **Unsure/Don't know**
- **Not applicable**

25. Not applicable.

Question 31: Do you think it should be an offence to provide false or misleading information regarding Decent Homes Standard compliance and exemptions?

- Yes
- No
- Unsure/Don't know

26. Yes. This will ensure that the information provided on the Portal or elsewhere is accurate.

Question 32: Duplicative burdens on landlords at local and national level are undesirable where they can be avoided. We want to work with local councils and other stakeholders to ensure that the transition to a Privately Rented Property Portal is as seamless as possible, including looking at how it can integrate with licensing schemes where practicable. We will also work to streamline requirements for landlords, such as by working with BEIS on synchronising guidance on minimum energy efficiency. It is imperative that the system meets the needs of landlords, tenants, agents and local councils. Please share thoughts on how we can streamline requirements and support compliance.

27. As the professional body for property agents, Propertymark is dedicated to providing guidance for our members to improve compliance and to ensure members have one place in which they can access guidance. We will be keen to work with the Department for Levelling Up, Housing and Communities to ensure we can disseminate guidance, provide feedback on the system and ensure compliance where we can.

Question 33: Do you think local councils should have a duty to investigate complaints of properties that fail to meet the Standard in their area?

- Yes
- No
- Unsure/Don't know

28. Yes. However, it must be noted that recent UK Government reports have highlighted the inconsistent use of enforcement tools to enforce current regulations on the private rented sector and how the enforcement capacity is so limited in some cases that it has been described as 'fire-fighting'². If local authorities are to be expected to investigate additional complaints or

² [Local authority enforcement in the private rented sector: headline report - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/local-authority-enforcement-in-the-private-rented-sector-headline-report)

are required to carry out additional inspections, they will need to receive an increase in funding. If they do not receive this, our fear is that non-compliant landlords and agents will continue to provide sub-standard housing and the new Standard will have little impact on the quality of homes.

Question 34: Should local councils be required to report activity related to addressing properties that fail to meet the Standard in their area?

- **Yes**
- **No**
- **Unsure/Don't know**

29. Yes. This will help hold non-compliant actors to account. It will benefit compliant agents by showing that they have never had homes that breached the Standards, and it will help tenants make more informed choices about renting property from those who have breached the Standards in the past.

Question 35: If local councils were required to report their Decent Homes Standard activity, to whom should they provide the information?

- **To their local community**
- **To central government**
- **Both their local community and central government**
- **Unsure/Don't know**

30. Both their local community and central government. This could be done by local authorities producing an annual report that is publicly available. We would support any reporting on Decent Homes Standard activity to be as transparent as possible. This would provide both the local community and central government a clear understanding of any activity that has taken place, either to judge the effectiveness of the local authority's approach or the understand when breaches have occurred.

Question 36: [For local councils only] How important would standalone enforcement guidance be to assist local councils in enforcing the Decent Homes Standard?

- **Very important**
- **Moderately important**

- Not important
- Unsure/Don't know
- Not applicable

31. Not applicable

Question 37: Do you have any further comments on the proposal to put a duty on local councils?

32. Yes. In the experience of our members, when local authorities have conducted inspections through the use of Environmental Health Officers, the advice provided and potential risks at a property identified have been far more useful. We would encourage promoting the use of sufficiently qualified professionals to investigate complaints and provide advice on how to resolve or prevent breaches.

Question 38: Do you think Decent Homes Standard failure awareness notices are a useful part of Decent Homes Standard enforcement?

- Yes, they are useful
- No, they are not useful
- Unsure/Don't know

33. Yes, they are useful. If the goal of the Standard is to raise the quality of homes in England, then having a failure awareness notice enables the property manager to respond and improve the property without the need for prosecution. An approach that focuses on prevention and mediation to support a reduction in breaches is more effective than an approach that focuses on prosecution.

Question 39: Do you think local councils should have the power to serve Decent Homes Standard improvement notices?

- Yes
- No
- Unsure/Don't know

34. Yes. These should clearly indicate the nature of the breach and how it can be resolved. We would also encourage mediation between the landlord or managing agent to discuss reasonable timescales to ensure that the breach is resolved as soon as feasibly possible.

Question 40: Do you think local councils should have the power to undertake emergency remedial works?

- Yes
- No
- Unsure/Don't know

35. Yes. In the case where a landlord or property manager continues to refuse to resolve the breach or does not respond to awareness or improvement notices. This should only be pursued as a last resort as the Standard should focus on prevention and swift resolution rather than prosecution.

Question 41: Do you think local councils should have the power to issue Decent Homes Standard failure prohibition orders?

- Yes
- No
- Unsure/Don't know

36. Yes. As with the power to undertake emergency remedial works, this should only be considered as a last resort.

Question 42: Should we amend legislation to make it explicit that a landlord does not have a right to attend inspections [by virtue of receiving notice to that effect]?

- Yes
- No
- Unsure/Don't know

37. No. We would highly recommend that landlords, or their representative such as a letting agent if they are unable to attend, should attend all inspections in most if not all instances. This would enable the local authority and inspectors to provide.

Question 43: Do you think that there is a role for other providers (not just the local council) in providing advice to landlords on whether their properties meet the Decent Homes Standard?

- Yes
- No
- Unsure/Don't know

38. Yes. There is certainly a role for professional and membership bodies such as Propertymark to help disseminate information, provide guides and provide advice for meeting the Decent Home Standard. Through membership Propertymark members have access to key industry information. This includes regular newsletters, Fact Sheets, guides, FAQs, Toolkits on legislation and Primary Authority Assured Advice. members receive discounts on events, training, industry suppliers and qualification workbooks. Our members are also provided with legal documents and templates including a Property Information Questionnaire and tenancy agreements. Members have unlimited access to legal helplines as part of their membership and Propertymark also provides training through online and classroom courses. The training is offered at foundation, intermediate and advanced levels, catering for everyone at different stages of experience and covering all areas of property related subjects. Our training courses do not equate to a qualification but a certificate of attendance. We also provide training through a series of regional meetings and workshops across the UK, national conferences, road show events and webinars. The training is provided face to face and online.

Question 44: Do you think local councils have a role in providing advice to landlords on pre-emptive work to prevent properties failing to meet the Standard in the near future?

- Yes
- No
- Unsure/Don't know

39. Yes. Local Councils do have a role in providing advice for landlords on pre-emptive work to prevent properties failing to meet the Decent Homes Standard.

Question 45: Where local councils provide this advice, should they be able to charge for this service?

- Yes
- No

- **Unsure/Don't know**

40. No. We do not feel that it is reasonable for local authorities to charge for advice that members of the public are legally required to follow.

Question 46: Should the Decent Homes Standard apply to all privately rented accommodation let on a tenancy?

- **Yes**
- **No**
- **Unsure/Don't know**

41. Yes. It is imperative that a level-playing field is created when the Decent Homes Standard is introduced. Otherwise, this may risk some landlords changing to alternative lettings, such as short-term lets, in order to escape their responsibilities.

Question 47: Should the Decent Homes Standard apply to residential temporary accommodation provided by local councils to homeless households?

- **Yes**
- **No**
- **Unsure/Don't know:**

42. Yes. We see no reason why homeless individuals should not have access to accommodation that meets minimum standards.

Question 48: Should the Decent Homes Standard apply to purpose-built student accommodation (e.g. halls of residence owned by universities or other providers)?

- **Yes**
- **No**
- **Unsure/Don't know**

43. Yes. We see no reason why student accommodation should be exempt from meeting the Decent Homes Standard.

Question 49: Should the Decent Homes Standard apply to property guardians, where empty buildings are temporarily used for accommodation to provide security?

- Yes
- No
- Unsure/Don't know

44. Yes. We see no reason why the Decent Homes Standard should not apply here.

Question 50: Should the Decent Homes Standard apply to lodgers, where a tenant lives in the property with the landlord?

- Yes
- No
- Unsure/Don't know

45. Yes. This will prevent landlords taking advantage of the exemption and breaching the standard while stating that they live at this address. We feel that it is a better approach to extend the Standard to homes with lodgers, rather than spending time and resources in order to understand if the home is the landlord's primary address.

Question 51: Should the Decent Homes Standard apply to non-traditional accommodation such as house boats or caravans?

- Yes
- No
- Unsure/Don't know

46. Don't know. We have insufficient knowledge of this type of accommodation to provide an evidence-based response.

Question 52: Should the Decent Homes Standard apply to 'tied' accommodation, which is where an individual is required to or has the option to live in certain accommodation for the purpose of their employment?

- Yes
- No
- Unsure/Don't know

47. Don't know. We have insufficient knowledge of this type of accommodation to provide an evidence-based response.

Question 53: Should the Decent Homes Standard apply to farm business tenancies and agricultural holdings?

- Yes
- No
- Unsure/Don't know

48. Don't know. We have insufficient knowledge of this type of accommodation to provide an evidence-based response.

Question 54: Do you have any other comments on the scope of the Decent Homes Standard, including other types of accommodation that you think should or should not be included in scope?

49. Local authorities will need to assess the different types of properties (Q.51-53) and potentially deliver separate guidance for each. A one-size-fits-all approach should be avoided, and exemptions made under the direction of organisations or individuals who are knowledgeable about these types of properties. If the UK Government introduce the Decent Homes Standard to the Private Rented Sector, it should also apply to short-term lets and non-Housing Act tenancies.

Question 55: What do you think will be the main impacts from bringing in a Decent Homes Standard in the private rented sector for both tenants and landlords? Please provide any evidence and further comments on impacts in the free text box.

- Improved tenant/landlord relationship
- Fairer competition in the rental market
- Improved health for tenants
- Improved wellbeing for tenants
- Increase in tenants' pride in their home
- Improved communities
- Financial cost for landlords to make changes
- Landlords reducing their portfolio size
- Increased rents

- **Increased property values**
- **Disruption for tenants whilst works are being undertaken**
- **Disruption for landlord whilst works are being undertaken**
- **Other (if you have evidence or further thoughts, please include here) [free text]**

50. We believe that there will be three main impacts from bringing in the Decent Homes Standard in the private rented sector for tenants and landlords. Firstly, financial costs for landlords to make changes. Secondly, improved communities. Thirdly, disruption for tenants whilst works are being undertaken. The UK Government will need to consider support options available, especially for lower-value homes, as landlords may be unable to resolve multiple breaches as the Standard is introduced. We do believe however that the additional homes meeting the Standard will improve the health and wellbeing of tenants which will lead to improved communities. That being said, some works that are required may mean that tenants will need to vacate their property. This should be acknowledged as a potential impact and therefore clear guidance must be issued in order for agents and landlords to understand how best to resolve potential breaches in the Standard.

Question 56: There are risks that bringing in the Decent Homes Standard means landlords exit the market or that they pass costs on to tenants. Which of the below would you support to mitigate the risks of any negative impacts of introducing a Decent Homes Standard in the private rented sector? Choose as many as you would like.

- **Cost caps**
- **Extended implementation timeline**
- **None**
- **Other [free text]**

51. Other. Due to the current pressure on the private rented sector, landlords should be able to claim any improvements or repairs needed to meet the Standard against their tax liabilities This will incentivise landlords to not only meet the Standard, but it will encourage landlords to improve the quality of housing they provide.

Question 57: To what extent would you support bringing in a cost cap on criteria B, C and D of the Standard (e.g. on the non-safety elements of the Standard)?

- **Strongly supportive**

- **Quite supportive**
- **Neither supportive nor unsupportive**
- **Quite unsupportive**
- **Strongly unsupportive**
- **Unsure/Don't know**

52. Strongly supportive. This will limit the number of landlords who cannot afford to meet the Standard when it is introduced.

Question 58: Do you think there should be a transitional 'grace' period before the Decent Homes Standard becomes a requirement, and when enforcement action can be taken?

- **Yes, there should be a grace period**
- **No, there should be no grace period**
- **Unsure/Don't know**

53. Yes, there should be a grace period. This will provide sufficient time for agents and landlords to understand what they need to do, and it will ensure that landlords of low-value property are able to resolve potential breaches over a longer period of time before enforcement action can be taken.

Question 59: If there were to be a grace period, what length of grace period should there be before the Decent Homes Standard becomes a requirement?

- **Less than 12 months**
- **12 months**
- **18 months**
- **Longer than 18 months**
- **There should not be a grace period**
- **Unsure/Don't know**

54. There should be a grace period of 12 months before the Decent Homes Standard becomes a requirement.

Question 60: Do you think that we should phase in parts of the Standard. For example, to bring in criteria A and B in the first instance, before including criteria C and D at a future point.

- **Yes, the elements of the Standard should be phased**
- **No, all elements of the Standard should come in at the same time.**
- **Unsure/don't know**

55. Yes, the elements of the Standard should be phased in. Phasing of the Standard will allow the Department for Levelling Up, Housing and Communities to assess the effectiveness of the introduction of the Standard and make changes to how the other phases are introduced.

Question 61: If elements of the Standard were to be phased in, please rank the order you would want them to be brought in from first to last.

- **Criterion A: Meets current statutory minimum standard for housing (free from category 1 hazards under HHSRS).**
- **Criterion B: Reasonable state of repair (Key building components age so 'old', condition, replace or repair – windows, doors, walls, roof structure, central heating appliances, gas fires, storage heaters, plumbing and electrics.**
- **Criterion C: Reasonable facilities and services (kitchen with adequate space and layout, appropriately located bathrooms and toilet, adequate external noise insulation e.g. traffic double glazing and adequate size and layout of common entrance areas for flats)**
- **Criterion D: Provides a reasonable degree of thermal comfort – efficient heating sources – MEES links ups/could be an exemption for e.g. listed buildings.**

56. We would recommend the order be: Criterion A, Criterion B, Criterion C and then Criterion D.

Question 62: If elements of the Standard were to be phased in, how long would you like to see between phases?

- **Less than 6 months**
- **6-12 months**
- **12-18 months**
- **More than 18 months**
- **There should not be any phasing**
- **Unsure/don't know**

57. We would like to see 6-12 months between the phasing in of the Decent Homes Standard requirements.