lisabel.miles@ageuk.org.uk

Age UK
7th Floor, One America Square
17 Crosswall
London
EC3N 2LB
T 0800 169 87 87 **F** 020 3033 1000
E policy@ageuk.org.uk
www.ageuk.org.uk

Response

This is Age UK's written response to proposed changes to the following elements of criterion C of the Decent Homes Standard:

By accessibility we mean the accessible features that are part of the basic structure of a home, for example walls strong enough to hold a grab rail, plumbing that can take a shower as well as a bath or stairs wide enough to take a stair lift.

Adaptations are the features added to a home to suit a person's particular disability

Given the current shortage of accessible homes, the requirement for homes to be accessible would have to be introduced through retrofit over a period of time. The requirements would have to be practical and take into account the limitations of our existing housing stock. There is no point making a top floor flat with five flights of stairs accessible but equally the requirements need to be sufficiently robust to make a real difference.

Adaptations

Age UK would also like to see adaptations as a requirement of the DHS standard and not just dealt with in the guidance.

The Fairer Private Rented Sector policy paper published by DLUHC in June 2022 sets out several types of landlord. 30% are thought to demonstrate good practice; 24% mixed compliance, 35% meeting the legal requirement; 11% with lower compliance and awareness[ii]. One can assume that the good practice group are likely to follow any good practice guidance on the DFG and adaptations. The Mixed Compliance and the lower compliance groups are characterised in the paper as follows:

Mixed Compliance - 24% of the private landlord population

> *Landlords likely to report mixed compliance with legislation, though many comply with good practice indicators*
>
> *Has some awareness of regulation changes but overall do not feel as though they have a good understanding of these*
>
> *Property is seen as a rental income and pension contribution.*
>
> *May not have carried relevant document checks but would have carried out safety checks.*
>
> *A bit more hands-off and may not know all the details of their property.*
>
> *Not a member of a landlord association and rely on GOV.UK and other online media and their letting agents for information.*

Meeting Legal Requirement - 35% of the private landlord population
> *Landlords likely to be compliant with most legislation, though less likely to be compliant with good practice indicators.*
>
> *Engaged and responsible, ensuring all legal and safety requirements have been carried out, especially relating to EPC and safety.*
>
> *Aware of upcoming changes that might affect letting practices and have some concerns about legislative changes.*
>
> *Property is viewed as source of investment income alongside other economic activities.*
>
> *Get information from GOV.UK, online forum and letting agents[iii]*

Looking at these characteristics, we can assume that addressing adaptations through non-statutory guidance is likely to impact some of the Mixed Compliance group and rather less of the Meeting Legal Requirement group. Together with the Low Compliance group, these groups account for 70% of landlords. This will mean that if supporting a DFG application is only a guidance requirement, a substantial

In addition to what is in the existing NRLA guidance it would be good to include:

Time scales – how long should it take to complete various stages in the process so that support is timely
Examples of good design – images of what is achievable
Clear definitions and explanations of what the key words mean so that the