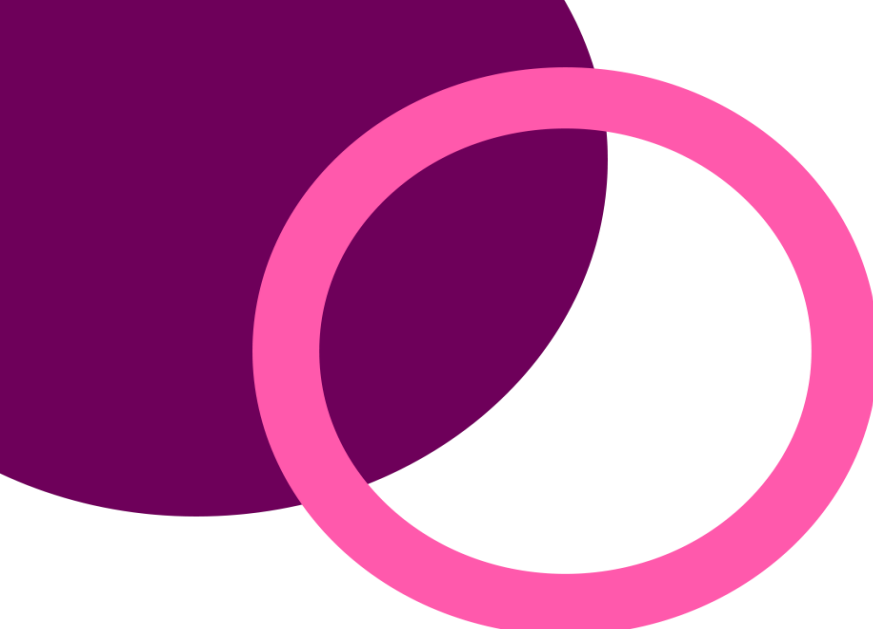




Homeless Link response to the consultation on a reformed Decent Homes Standard for social and privately rented homes

September 2025

Demography Questions

1. In which capacity are you completing these questions?

Other (please specify):

Membership charity for homelessness services

Proposal 1: Updating the definition of disrepair (Criterion B)

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

Yes

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

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

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

16a. Do you agree with the proposed list of building components that must be kept in good repair?

Yes

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

Homeless Link is the national membership organisation for frontline homelessness services. Representing over 700 organisations ranging from Housing Associations, supported accommodation providers and hostels to day centres, night shelters and outreach, we work to improve services and campaign for policy change that will ensure everyone has a place to call home and the support they need to keep it.

We are responding to the consultation on the new Decent Homes Standard as many of our members providing homelessness accommodation services are Registered Providers and are therefore currently subject to the existing DHS, and many more of our members will fall

within scope if and when the Renters Rights Bill passes, linked to the Supported Accommodation (Regulatory Oversight) Act coming into effect.

It is our understanding that the Renters' Rights Bill will apply the Decent Homes Standard to all privately rented supported exempted accommodation housing (including that occupied both under tenancies and licences). The definition of 'supported exempt accommodation' for the purposes of this legislation is the same as in section 12 of the Supported Housing (Regulatory Oversight) Act 2023 so includes, for example, local authority hostels.

We are clear that residents of all tenures deserve to live in safe, functional, decent homes that meet their needs, and are extremely supportive of the Government's efforts to improve standards for tenants, update the DHS in line with modern requirements, and extend it to apply to all forms of rented accommodation.

However, some types of supported accommodation and hostels require further mitigations. The new DHS must give further consideration to the fact that the people living in some forms of privately rented supported exempted accommodation housing may have very high support needs which could cause them to exhibit challenging behaviour that makes damage more likely and has an impact on the landlord's ability to maintain the property. Such services should not be penalised for the nature of the work they carry out and should be supported with those costs.

The specific impact of the new Decent Homes Standard on supported accommodation, in the context of much increased forthcoming regulatory requirements, needs further consideration. We support the proposals around updating the definition of disrepair, but many of these will come at increased cost to some services. Without mitigations, and funding for compliance with a swathe of new regulatory requirements, there is a real risk that the sector could collapse. Preserving the supply of decent supported accommodation must be at the forefront of the Government's mind.

Homelessness services have suffered from years of funding cuts and an increasingly fragmented and short-term funding system. Since the end of the Supporting People ringfence in 2009 there has been a 47% decrease in local authority commissioned contracts for homelessness accommodation providers. This underfunding of the sector over the last 15 years has meant that many good providers face extreme financial challenges and viability is increasingly difficult. We are mindful that, cash poor and focused on survival and delivery, some providers are behind where they would like to be in terms of their physical environments. The Government is making extensive new demands of supported accommodation providers, particularly through the upcoming implementation of the Supported Housing (Regulatory Oversight) Act, and has so far offered no additional funding to support with this transition. This is at the same time as local authorities are squeezing contracts and asking providers to do more with less as a result of their own financial challenges – or in some cases, decommissioning essential services completely, or doing so by stealth via the withholding of payment of Enhanced Housing Benefit.

It is in this context that any new costs to supported accommodation services could result in the reduction of provision or closure of services as they become unviable. We therefore call on the Government to provide funding to support services to comply with an increasingly robust regulatory landscape, including the new Decent Homes Standard.

Quote from a Homeless Link member: *"The response times and repairs obviously link in with other regulation that's coming in, things like Awaab's law coming in later in the year making 24-hour repairs compulsory, emergency repairs being done in 24-hours ... Like with everything, we wish to provide these really comfortable therapeutic environments, but we don't have it 100% at the moment, and there's always that cost element. I'm just aware of that as well - what we would like to in an ideal world and what we actually can afford to do with our funding."*

Quote from a Homeless Link member: *“It’s challenging where residents are higher risk – we had a referral for a young person who is known to break stuff. So then I’m having to scrabble around to think, what do I have in place for repairs?”*

Proposal 2: Facilities and services (Criterion C)

20d. If there is anything else you would like to add on this specific proposal, please do so here

The Government needs to give further consideration to how Criterion C might apply to supported accommodation, particularly hostels. We are mindful that this tenure type may not always have the following:

- a kitchen with adequate space and layout
- adequate size and layout of common entrance areas for blocks of flats
- an appropriately located bathroom and WC

The Government has already proposed certain exemptions and mitigations for Temporary Accommodation. Some types of supported accommodation and hostels share similar characteristics to forms of temporary accommodation, in that there may be limited cooking facilities, or, more rarely, a lack of private bathroom facilities. As a minimum, the same mitigations that the Government propose to apply to Temporary Accommodation in relation to kitchen and cooking facilities should also apply to supported accommodation and hostels.

Hostel provision that is intended to be very short term and is delivering support to keep a person safe until they can be moved to more suitable accommodation may be a very communal setting. The DHS as applied to mainstream housing may consider that there are too few communal kitchen or, more rarely, bathroom facilities per person, or kitchen appliances could be limited to that of a kitchenette.

There are legitimate questions to be asked about whether such settings are the most appropriate for supporting and aiding recovery and successful move-on. However, with all forms of homelessness rising and the capacity of homelessness services static at best, we cannot afford to lose otherwise decent provision in the short term.

Beyond hostels, it may be that the nature of the building prevents supported accommodation services from meeting the requirement around the size and layout of common entrance areas. When we consulted with members about the Government's supported accommodation regulations proposals, some providers had concerns about the physical limitations of the buildings in which they currently operate, which may be safe and functional but not, for instance, set up to facilitate visits from friends or family. Equally, we are aware of examples of innovative, award-winning services that have provided high quality supported housing by converting buildings originally designed for another use, which could fall down on this standard on a technicality.

The Government should revise the DHS so that it takes specific consideration of how it will apply to supported accommodation and hostels, and as a minimum should apply the same mitigations that it is proposing to apply to Temporary Accommodation to supported accommodation and hostels. These mitigations should be expanded for supported accommodation, to include flexibility around the amount of communal space/size of common entrance areas, and to reflect the fact that damage and wear and tear may be more likely as a result of the needs of the residents housed. Services that struggle to meet these aspects of the DHS and are willing and able to improve should be supported to do so with guidance and funding.

Proposal 5: Suitable floor coverings (Criterion C)

24a. 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?

Yes

24b. If you have any views on this specific question you would like to share, please do so here

All residents should be provided with a clean, suitable floor covering by their landlord when they begin a tenancy. We agree that landlords should use floor coverings from a previous tenancy if they are clean, free from hazards and in a reasonable state of repair at the start of the tenancy. The Government should be mindful that for some types of supported accommodation and hostels, the accommodation provided may be very short term and experience a high turnover of residents. People living in such accommodation may exhibit challenging behaviours and the floor coverings could be subject to higher than average wear and tear. Some flexibility may need to be applied as to the quality of the floor coverings in short term supported accommodation. It would not be practical or necessary for the providers of such accommodation to replace the floor coverings with the arrival of every new resident, if each resident was only staying a matter of weeks, as long as the landlord was making appropriate efforts to ensure that existing floor coverings were cleaned and maintained to decent condition. The DHS should apply flexibility here for the specific circumstances of supported accommodation.

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

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

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

29a. 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

29b. 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?

Yes

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?

Yes

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

We would reiterate the points made in response to question 19. We support the addition of Criterion E to the DHS, but these new requirements may well come at increased cost to some supported accommodation services/hostels.

Homelessness services have suffered from years of funding cuts and an increasingly fragmented and short-term funding system. Since the end of the Supporting People ringfence in 2009 there has been a 47% decrease in local authority commissioned contracts for homelessness accommodation providers. This underfunding of the sector over the last 15 years has meant that many good providers face extreme financial challenges and viability is increasingly difficult. We are mindful that, cash poor and focused on survival and delivery, some providers are behind where they would like to be in terms of their physical environments. Any new costs to supported accommodation services could result in the reduction of provision or closure of services as they become unviable due to unaffordable costs with no available resource. We therefore call on the Government to provide funding to support services to comply with these enhanced requirements around damp and mould.

The Government should bear in mind that some supported accommodation providers may support residents with high needs and challenging behaviours, which could make it more difficult to encourage habits that help keep damp and mould to a minimum.

There is also the possibility, particularly in more communal hostel settings, that there could be a serious damp or mould issue confined to one room. We fully agree that a home should be considered non-decent if there are Category 1 health and safety hazards or other issues of concern in any room/space where a resident would be living/residing. However, we have spoken to providers about the scenario of there being serious damp and/or mould somewhere in the building which could in theory be closed off and managed while the rest of the building is still in use. For instance, if there is mould contained in one room, the service is taking action to address it and that room is shut off in the meantime, this should not necessarily be grounds for all dwellings within the accommodation being considered non-decent. The Government should publish clear guidance on this to ensure a pragmatic approach is applied to supported accommodation settings.

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

32. This question relates to Temporary Accommodation: 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?

Yes

35a. This question relates to Supported Housing: Are there any challenges you foresee in applying the outlined DHS proposals in Supported Housing?

Yes

35b. If you have any views on this specific question you would like to share, please provide details

The Renters' Rights Bill will apply the Decent Homes Standard to all privately rented supported exempted accommodation housing (including that occupied both under tenancies and licences). The definition of 'supported exempt accommodation' for the purposes of this legislation is the same as in section 12 of the Supported Housing (Regulatory Oversight) Act 2023 so includes, for example, local authority hostels.

We are clear that residents of all tenures deserve to live in safe, functional, decent homes that meet their needs, and are extremely supportive of the Government's efforts to improve standards for tenants, update the DHS in line with modern requirements, and extend it to apply to all forms of rented accommodation.

The Government has already proposed certain exemptions and mitigations for Temporary Accommodation. Some types of supported accommodation and hostels share similar characteristics to forms of Temporary Accommodation, in that there may be limited cooking facilities, or, more rarely, a lack of private bathroom facilities. As a minimum, the same mitigations that the Government propose to apply to Temporary Accommodation in relation to kitchen and cooking facilities should also apply to supported accommodation and hostels.

We are clear that some types of supported accommodation and hostels require mitigations that go beyond what has been suggested for Temporary Accommodation. The new DHS must give further consideration to the fact that the people living in some forms of privately rented supported exempted accommodation housing may have very high support needs which could cause them to exhibit challenging behaviour that makes damage more likely and has an impact on the landlord's ability to maintain the property. Such services should not be penalised for the nature of the work they carry out and should be supported with those costs. It must also consider that communal space may be limited in some types of

supported exempted housing. It may not always be feasible or necessary for one of these services to invest in adapting their entire building.

The specific impact of the new Decent Homes Standard on supported accommodation, in the context of much increased forthcoming regulatory requirements, needs further consideration. We broadly support the proposals, but many of these will come at increased cost to some services. Without mitigations, and funding for compliance with a swathe of new regulatory requirements, there is a real risk that the sector could collapse. Preserving the supply of decent supported accommodation must be at the forefront of the Government's mind.

Homelessness services have suffered from years of funding cuts and an increasingly fragmented and short-term funding system. Since the end of the Supporting People ringfence in 2009 there has been a 47% decrease in local authority commissioned contracts for homelessness accommodation providers. This underfunding of the sector over the last 15 years has meant that many good providers face extreme financial challenges and viability is increasingly difficult. We are mindful that, cash poor and focused on survival and delivery, some providers are behind where they would like to be in terms of their physical environments. The Government is making extensive new demands of supported accommodation providers, particularly through the upcoming implementation of the Supported Housing (Regulatory Oversight) Act, and has so far offered no additional funding to support with this transition. This is at the same time as local authorities are squeezing contracts and asking providers to do more with less as a result of their own financial challenges – or in some cases, decommissioning essential services completely, or doing so by stealth via the withholding of payment of Enhanced Housing Benefit.

Providers have also faced increasing cost pressures from rocketing inflation alongside energy price increases and the impact of the increased employer contributions to national insurance. Many decent, well-meaning providers will need to make significant investments in order to ensure that all the schemes they are responsible for can comply with new regulatory requirements, and that they have the necessary staff, buildings and reporting systems to demonstrate compliance. At present, it's unclear where money for those investments would come from.

It is in this context that any new costs to supported accommodation services could result in the reduction of provision or closure of services as they become unviable. We therefore call on the Government to provide funding to support services to comply with an increasingly robust regulatory landscape, including the new Decent Homes Standard.

We also call on the Government to give specific consideration to how the Decent Homes Standard might apply to the different forms of privately rented supported exempted accommodation housing, and provide supported accommodation with flexibility and exemptions, in line with and beyond what has been proposed for Temporary Accommodation. Throughout this response we have detailed the legitimate reasons as to why certain proposals may not be appropriate to apply to supported accommodation.

This is particularly true for supported accommodation or hostels that are quite short-term and have a high turnover of residents, those that house people with high needs who may exhibit challenging behaviours, or innovative, unconventional supported housing models. Such services should not be penalised for the nature of the work they carry out and should be supported with those costs.

As part of our engagement around supported accommodation regulations, we ran a survey of Homeless Link members on their estimated cost of complying with the new licensing regime, which would include needing to meet all the existing accommodation requirements

and standards relevant to their housing tenure, which will include the updated DHS. These examples give a sense of the tangible financial impact on services of complying with new requirements if additional funding is not made available:

- One respondent, a supported accommodation provider in the North West with an annual turnover of £2.3 million and 70 bedspaces, estimated that £50-100,000 would be required in capital investment to meet the licence conditions for all their schemes.
- One respondent, an organisation in the South East providing wraparound services for young people, including 1 supported accommodation project with 9 bedspaces, with an annual turnover of £800,000, estimated that they would need to spend £20,000 on painting external walls and addressing damp and mould in certain rooms in order to meet the licensing conditions.
- One respondent, a supported housing organisation in Yorkshire and the Humber with a £7.2 million turnover and 400 bedspaces, estimated that they'd have to invest £500,000 in building/accommodation upgrades/repairs in order to meet the conditions of the licensing regime.
- One respondent, a supported accommodation provider operating in the South West, with an annual turnover of £1 million and 75 bedspaces, flagged that their properties are small schemes in local communities and had been acquired in an ad hoc way. Some do not have communal living rooms as these have had to be turned into bedrooms. They said that if they had to lose bedrooms in schemes in order to create communal space, this could cost them £221,000 plus support income lost on bedspaces – as well increasing homelessness. Such a loss would cause them to have to review their whole service.

The Government should also be mindful of models of supported accommodation where the landlord is not the same as the support provider. Scenarios could arise where the support provider is providing an excellent service but is held back by a less diligent landlord who fails to carry out the necessary repairs and maintenance in the required timescales and jeopardises the decency of the home. For the purposes of the forthcoming supported accommodation regulations, a support provider should not be penalised for the actions of a landlord meaning that the DHS is not met. The Government should outline how the licensing authority will work with and, where necessary, enforce against landlords while maintaining the supply of supported accommodation in such scenarios.

Quotes from Homeless Link members:

“The new regulations would likely require physical upgrades to properties (e.g. improved fire safety, accessible features, enhanced staffing ratios), and without funding, we would be unable to meet compliance requirements in all current locations. As a result, some units would need to be temporarily or permanently decommissioned.”

“We have already had to find almost £400k in the current budget year due to the increase in NI and county council cuts. If no additional funding is available to support the implementation of these requirements we would need to cut posts which would impact upon the quality of service the people we support would receive - this could reduce visits for support planning and welfare checks.”

“We are not a registered provider and our authority has already stated that they will not work with non-RPs in the future due to subsidy rules. The costs of complying with more licensing

on top of commissioning demands/local licensing/mandatory requirements will make it impossible for small providers to continue.”

“We would need to increase the IHM element of our Housing Benefit claims to cover the cost of the extra staff hours as the current team don’t have capacity to do the following, building risk assessments, photos of properties, monitoring maintenance & repairs, applying for the licence’s etc. Therefore, the cost would be carried by the local authority through increased housing benefit claims.”

“It’s challenging when we aren’t the ones in control of repairs – if we lease a building it can be really challenging to get the local authority out to conduct repairs on time. And they have a repairs policy, so that obviously doesn’t fix everything! We end up paying for it, so that’s even worse if there’s then a risk to us meeting the [National Supported Housing] standards – it needs to be everyone held to account.”

“In some cases it might be someone else actually managing the property, and we’ve been on at them for absolutely ages to do certain repairs and they haven’t. So then would you potentially lose a license due to someone else not doing what they’re meant to be doing? Or even if we do run it, if there just hasn’t been running budget to do every single repair or, you know, multiple different reasons where with the best of intentions we might be struggling to do it. So I guess one of my questions would be, is there going to be support, particularly when it comes to expensive things like repairs, to help legitimate providers get everything up to an acceptable standard?”

Section 5: Guidance

38a. 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)

Other

38b. If you have selected ‘Other’, please say what you would like to be included

The Government should issue specific guidance on how the DHS will apply to the different types of privately rented supported exempted accommodation housing, including homelessness supported accommodation and hostels, and where flexibility or exemptions may apply if there are legitimate reasons that DHS criteria cannot be met.

Section 7: Meeting the Standard

48c. These questions relate to the social rented sector. Do you agree that providers should be given flexibility from meeting the DHS where there are physical or planning factors preventing compliance?

Yes

48e. If there is anything else you would like to add on this specific question please do so here.

Any flexibility afforded to RSLs in relation to legitimate factors preventing compliance should also be granted to licensed supported housing providers, whether or not they are RSLs.

What We Do

Homeless Link is the national membership charity for frontline homelessness services. We work to improve services through research, guidance and learning, and campaign for policy change that will ensure everyone has a place to call home and the support they need to keep it.

Homeless Link

Minories House
2-5 Minories
London
EC3N 1BJ

www.homeless.org.uk
@HomelessLink

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