Decent Homes Standard open consultation – social and private rented sectors

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Mike Victory-Rowe



Purpose: to summarise the proposed reforms to the Decent Homes Standard and outline key implications for landlords, tenants and the wider housing sector.

Background

The government has launched a ten-week consultation on modernising and extending the Decent Homes Standard (DHS) to both the social and private rented sectors. This follows concerns that the current DHS, last updated in 2006, no longer reflects tenant expectations, safety standards or sector best practice. The Renters' Rights Bill will underpin the legal application of DHS to the PRS for the first time.

The case for change

- 10% of social homes and 21% of private rented sector homes are currently non-decent
- The tragic death of Awaab Ishak in 2020 highlighted the urgent need for consistent action on damp and mould
- The DHS will align with wider reforms, including Awaab's Law, minimum energy efficiency standards (MEES), which are also being consulted on and a revised Housing Health and Safety Rating System (HHSRS).

Key proposed changes to the DHS

Criterion A: Hazards

No changes: homes must remain free from category one hazards, assessed via the HHSRS.

Criterion B: Reasonable state of repair

- Age removed from disrepair definition – condition only
- Proposing a more descriptive definition of 'poor condition'
- Proposed updates to definitions for 'key' components within the current DHS
- Expanded list of components to be kept in reasonable state of repair:
  - Upgrading to 'key' components: kitchens and bathrooms including freestanding showers
  - Adding to key components: lifts, internal wall and ceiling finish

- Adding under fire safety: internal doors, fire alarm systems, sprinkler systems, signage
- Adding to damp and causes of damp: damp proof courses to the definition of the wall structure components and mechanical ventilation installations (key)
- All heating systems covered as a key general component and removing references to specified systems
- 'Other' components: to include rainwater goods, stair handrails, balustrades and stair-treads and door entry systems
- To add as 'other' component for social sector only: shared outdoor spaces, including boundary walls, curtilage, pathways and steps, external lighting, bin stores.

Criterion C: Facilities and services

Taking the age requirement out of the DHS and making kitchens and bathrooms key components means that the new proposals for core facilities is that properties must provide at least three of four of the following:

- Adequate kitchen space/layout
- Appropriately located bathroom/WC
- Adequate external noise insulation
- Adequate communal entrance areas (flats).

This proposal, as written, implies that houses must meet all three applicable facilities (kitchen, bathroom/WC, noise insulation) to be decent, while flats can meet the DHS with only two of these if their communal entrance areas are adequate. This creates an apparent inconsistency, as flats could pass with deficiencies in critical facilities (eg, an inadequate kitchen or poor noise insulation) that would cause a house to fail. This seems counterintuitive to the DHS's aim of ensuring consistent, high-quality living conditions across all dwellings.

- New proposals:
  - Mandatory child-resistant overridable window restrictors on high-risk windows
  - This would align with relevant building regulations and relevant fire safety regulations and the government would state that fire risk assessments should be updated to reflect any relevant changes made to dwellings.
- Considering:
  - Minimum security standards for doors/windows at point of replacement
  - Requirement for floor coverings in all rooms at start of tenancy (from 2035 for new tenancies at earliest).

Criterion D: Thermal comfort

- Homes must meet minimum energy efficiency standards (MEES) requirements (using post reform energy performance certificates (EPC) at EPC C or equivalent by 2030) and have programmable heating
- The government is consulting on energy efficiency measures in the social rented sector in a separate consultation which was published 2 July 2025.

Criterion E: Damp and mould (new)

Standalone requirement: all homes must be free from damp and mould, enforced via the HHSRS to cover categories A-H and excluding only the mildest two categories I and J which is a higher threshold than for other hazards in the HHSRS.

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

- The government plans to extend the DHS to temporary accommodation (TA) alongside measures to apply Awaab's Law also to the sector
- The consultation paper explains how different elements of the standard will apply to TA
- The government has recently consulted on a licensing regime, forcing new national supported housing standards which may include meeting the DHS, to regulate the quality of support provided in supported housing
- The government will publish its response to feedback on the consultation in due course
- As the extension of the DHS to the private rental sector will encompass many properties that are leasehold, the government is keen to understand the cost implications of meeting the DHS for leaseholders in mixed tenure blocks.

Main differences compared to the current Decent Homes Standard

Aspect	Current DHS	Proposed DHS 2025
Applicability	Social housing only	Social and private rented sector
Disrepair assessment	Based on age and condition of components	Based solely on condition; age no longer relevant

Aspect	Current DHS	Proposed DHS 2025
Facilities	Age thresholds for kitchens and bathrooms	Age thresholds removed; must provide three of four modern facilities
Window safety	General safety requirement via HHSRS	Specific requirement for window restrictors to prevent child falls
Home security	Covered indirectly via 'entry by intruder' hazard	Potential new requirement for secure doors/windows to modern standards
Damp and mould	Covered indirectly via general hazard assessments	New standalone requirement for homes to be free of damp and mould HHSRS categories A-H
Floor coverings	No requirement	Consideration of requirement for suitable floor coverings at start of tenancy
Energy efficiency	Requirement for insulation/ heating, outdated technical standards	Aligned with modern MEES (EPC C target), programmable heating focus
Regulation and enforcement	RSH regulates social housing, no PRS equivalent	Expanded enforcement powers for PRS via local authorities

Wider reforms and context

- Awaab's Law: statutory response times for hazards, phased from October 2025
- PRS inclusion: DHS legally extended to the private rented sector via the Renters' Rights Bill
- Energy efficiency: DHS aligns with EPC C target by 2030 for social and private rented homes.

Implementation timeline

- DHS enforceable in PRS: 2035 or 2037 (pending consultation)
- Regulatory requirement in social housing: 2035 or 2037
- Floor coverings proposal (if adopted): no earlier for new tenancies than 2035.

Consultation details

- Deadline for responses: 11:45pm, 10 September 2025
- Stakeholders encouraged to respond via the online survey or by email/post
- The consultation seeks views on technical proposals, practical challenges and landlord/tenant implications.

Sector implications and key considerations

- Greater focus on condition over age may alter maintenance priorities
  - Social landlords will need enhanced stock condition data to evidence compliance
  - PRS landlords face significant new regulatory responsibilities.
- Mandatory damp and mould standards reinforce health and safety obligations but by adding in most category two levels D-H this could have a significant impact on the level of non-decency in the sector
- Changes to EPC certificates and the introduction of MEES could mean some existing EPC C homes in the social sector are no longer compliant due to the different way of measuring compliance – landlords are urged to assess the likely impact
- Potential financial impacts:
  - Increased capital costs for compliance (eg, window restrictors, heating upgrades)
  - Rent convergence policy running alongside DHS to help fund landlord investment (subject to separate consultation).
- Flexibility for hard to treat stock and proportionality in enforcement are being consulted on.

Recommended actions

- Review stock condition data for alignment with proposed DHS and MEES requirements
- Engage with tenants on DHS proposals and possible impacts
- Contribute to your organisation's formal consultation response
- Prepare to update policies on damp and mould, disrepair and tenancy management
- Plan for long-term financial modelling to address DHS compliance.

Conclusion

We welcome that the proposed DHS reforms aim to raise standards, improve tenant safety and create consistency across social and private rented homes. However, they carry significant operational and financial implications for landlords. HQN members are encouraged to engage actively with the consultation and share insight and practical concerns to help shape a fair, workable standard for all.

About the author

Mike Victory-Rowe has more than 30 years' experience of working in property and asset management in the housing sector. He works with a range of clients and partners to deliver innovative asset management solutions to the sector and has advised housing associations and charities on strategic asset management and investment, active asset management solutions, business intelligence and performance, property option appraisals and disposals and health and safety compliance. He is a chartered building surveyor. As well as a succession of managerial and executive roles (most recently Assistant Director of Asset Management at Knightstone). Mike has also held a number of non-executive positions.

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Rockingham House, St Maurice's Road, York, YO31 7JA
Tel: +44 (0)1904 557150 Email: hqn@hqnetwork.co.uk Visit: hqnetwork.co.uk

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