



## **G15 Residents' Group**

*A forum to unify and promote the resident voice to influence, reform and celebrate social housing*  
**Raise the Views of residents - Promote Quality social housing - Advocate for the Future of social housing**

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### **G15 Residents Group Response – Decent Homes Standard**

Submitted by: G15 Residents' Group

Date: 10 September 2025

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#### **Introduction**

The G15 Residents' Group (G15RG) is made up of residents from London's largest housing associations, collectively housing 1 in 10 Londoners in social and affordable homes. We welcome the opportunity to respond to the government's consultation on the proposed reforms to the Decent Homes Standard (DHS), and we remain committed to amplifying the voices of our communities.

Our response is informed by:

- The urgent need for high-quality social and private rented homes
- The importance of aligning standards across all housing tenures
- The lived experiences of G15RG members, representing diverse demographics and tenure types across London
- Key concerns raised in the media and elsewhere about social housing conditions
- Ongoing feedback from residents through our engagement forums

We strongly support the proposed expansion of the DHS to include both social and private rented homes in England. This is particularly important given the increasing reliance on temporary accommodation (TA), which often falls below acceptable standards. Many residents in TA are vulnerable individuals and families with young children, and they deserve safe, secure, and dignified living conditions.

We welcome the introduction of new standards addressing damp and mould, the modernisation of kitchen and bathroom criteria, the mandatory introduction of flooring for new tenancies, and the inclusion of thermal comfort for social homes. These reforms are essential to improving the safety and quality of housing in England.

We also recognise the cost and complexity of delivering these changes. Social landlords are navigating a rapidly evolving legislative landscape that is welcome and necessary, but which also require significant investment, time, and resources. We therefore urge the government to put in place a rational, phased approach to implementation by 2037. This would mean that landlords' first priority for investment from now will need to be on safety and decency if they are to comply with the new standards, which we would welcome.

The reforms must rebalance housing providers' focus on existing homes, and we believe rental income should be ring-fenced for investment in safety and decency rather than for the delivery of new homes. New standards should also enshrine excellent resident services built on communication, respect, and trust. We refer to our STAIRs consultation response, which highlights the intricacies of the resident-landlord relationship, and our Rent Convergence consultation response which sets out our position in respect of rents and decency.

- [202407\\_G15-Residents-Group-response\\_Social-Tenant-Access-to-Information-Requirements-STAIRs-consultation.pdf](#);
- [G15RG-rent-convergence-response-to-Angela-Rayner.pdf](#)

We believe that social rents should remain as affordable as possible in perpetuity. But we also recognise that there are major costs associated with new decent homes standards. It is therefore essential that government provides long-term sustained funding to drive up standards, support landlords' investment and ensure that social housing residents live in a good quality decent home.

## **General Comments**

### **Clarification Needed:**

A clear distinction must be made between what is covered under Awaab's Law and the Decent Homes Standard (DHS). Awaab's Law primarily addresses urgent health and safety concerns, such as damp and mould, which require immediate action, whereas the DHS provides a broader, proactive framework for long-term housing quality. Clear guidance is needed to help residents and landlords understand their respective rights and responsibilities, and to explain how these different policies intersect.

Particular attention should be given to the inclusion of damp and mould as an additional DHS criterion (E). Under the Housing Health and Safety Rating System (HHSRS), Category 2 hazards include situations that may fall outside landlords' direct control. This creates a risk of disrepair issues being reported to the regulator, even where housing associations have limited or no ability to take corrective action. It may be that this is an undeliverable aspect of the proposed standard and one that is adequately covered by the provisions in Awaab's Law.

### **Capacity Considerations:**

A phased and measured approach is needed to reflect landlords' current capabilities, ensuring they are not set up to fail from the outset. Workforce shortages, supply chain pressures, and wider economic challenges must also be factored into delivery. There is a significant role for government in helping industry navigate these challenges.

### **Funding Access for Registered Providers (RPs):**

Future funding mechanisms must recognise the significant challenges faced by larger housing associations, which manage extensive and often complex stock portfolios in London. As discussed, the principle behind Decent Homes is that the absolute priority for landlord's investment should always be safety and quality in homes to support existing residents. Only what is left over or supported by cross-subsidy and private borrowing by landlords should be used for new homes – as much needed as they are.

The new Social and Affordable Homes Programme funding for development is obviously welcome, but from the residents' perspective what is required, given the scale of the investment challenges after many years of public funding cuts, is financial support for warm and decent homes as it was in Decent Homes 1. Sustained, equitable funding across the social housing system is essential to ensure both the improvement of existing homes and the continued delivery of much-needed new housing.

### **Service Charges:**

We recognise that the costs of meeting new legislative requirements may be passed on to leaseholders, shared owners, and private renters. This risks creating further affordability pressures at a time when many households are already struggling with rising living costs.

To ensure fairness and transparency, service delivery models must be developed collaboratively with residents, taking a needs-based approach that balances compliance with affordability. Clear communication, transparency in cost breakdowns, and resident involvement in decision-making are critical to building trust and ensuring charges remain proportionate and justifiable.

We also urge the government to provide guidance and financial support to limit the extent to which compliance costs are passed on to residents. Without such safeguards, higher service charges could undermine the affordability of social and affordable housing. This aligns with our Rent Convergence consultation response, where we emphasised the need for rents and related charges to remain fair, proportionate, and consistent with the quality of homes provided.

## **Resident Involvement:**

G15RG continues to promote the inclusion of meaningful resident perspectives in shaping housing policy. We welcome the MHCLG's promotion of the Social Residents Panel as a platform for residents' voices and encourage the creation of more resident-led groups. Engagement must be structured, using independent panels, digital tools, and in-person forums to ensure diverse experiences and viewpoints are heard, valued, and acted upon.

## **Modernising Disrepair Assessments**

- **Intent Supported:** We agree with the sustainability focus of replacing items based on condition rather than age.
- **Clarity Required:** Definitions of "poor condition" must be clear. For example, a kitchen worktop may not be broken but worn seals could lead to water ingress and further damage.
- **Data Systems:** We support the updating of data systems to monitor home standards. Residents should be utilised as a knowledge base, drawing on their experience of past cyclical works and home surveys. Feedback loops must be created so residents can track reported issues and outcomes.
- **Professional Training:** Surveyors and contractors should receive training on identifying hidden disrepair, such as condensation and mould behind fitted units.

## **Removing Age Limits for Kitchens and Bathrooms**

- **Sustainability and Fairness:** We support this approach which looks at condition of kitchen and bathrooms rather than age.
- **Flexibility in Cyclical Works:** Renewal policies should allow for partial replacements rather than full refurbishments to avoid waste.
- **Consistency and Transparency:** Policies must be applied consistently to avoid the pitfalls of an approach that relies much more on subjective decisions. Co-design with residents should guide refurbishment priorities.

## **Window Safety**

**Support with Caution:** While we agree with enhanced window safety, consideration must be given to maintaining access to fresh air, especially during increasingly hot weather. Government guidance should promote designs that combine safety with effective ventilation, such as restrictors that allow airflow. We would also welcome the introduction of security and locks as key safety components for windows.

## **Floor Coverings at Start of Tenancy**

- **Equity and Dignity:** Providing flooring at the start of tenancy is essential, particularly for residents transitioning from homelessness or TA.
- **Child Development:** We strongly support this measure for families with young children, as it contributes to a safe and nurturing environment.
- **Fit for Immediate Use:** Homes should be ready for immediate occupation, reflecting dignity and respect for new tenants.
- **Health and Wellbeing:** Flooring reduces respiratory risks, prevents slips, and provides mental health benefits. Durable and recyclable materials should be encouraged to promote sustainability.

## **Conclusion**

The G15 Residents' Group strongly supports the government's ambition to modernise and extend the Decent Homes Standard. To succeed, reforms must be delivered with adequate funding, clear communication with residents, and stronger accountability measures for landlords. Government should also work in partnership with resident-led groups to monitor and evaluate progress, ensuring reforms deliver tangible improvements for communities across London and beyond.