

## **Consultation on the Home Report**

**The Scottish Disability Equality Forum (SDEF) works for social inclusion in Scotland through the removal of barriers to equality and the promotion of independent living for people affected by disability.**

**We are a membership organisation, representing individuals affected by disability, and organisations and groups who share our values. Our aim is to ensure that the voices of people affected by disability are heard and heeded within their own communities and at a national and political level.**

**Our Respondent Information Form can be found at the end of the document.**

### **General points:**

- We were surprised that the List of Consultees in the consultation document does not include any disability organisations, particularly given the accessibility audit included within the Single Survey.
- We were disappointed to see so little focus on the accessibility audit element of the Single Survey. 29% of those owning a home have a long standing limiting illness, health problem or disability according to 2012 Scottish Household Survey figures. With an ageing population, the demand for information about property accessibility is likely to grow significantly.

## **Answers to individual consultation questions**

**Before completing this response, SDEF polled its members with a shorter version of this consultation. 32 members responded and we have used these as the basis of our response.**

### **SECTION 1**

**Q1) Do you think the Home Report is meeting its original objectives?**

Yes.

It is impossible to tell what the housing market would have looked like if the Home Report had not been introduced in Scotland. The property condition issues remain, and the issues of low upset prices and multiple surveys could well have returned as the market heated up if the Home Report had not been in place.

**Q2) Are the original Home Report objectives still appropriate?**

Yes.

Nine out of ten (91%) SDEF members who responded to our survey thought the objectives were still appropriate.

The issue of poor home condition remains and will not have disappeared in the 5 years the survey has been in place. Arguably, it will have worsened during a recession as people lack money to invest in their property.

The survey element of the Home Report continues to play a valuable role in highlighting issues that must be addressed, ensuring that a seller is aware of the costs they face if they purchase it. It should also be encouraging maintenance but evidence of this would be hard to gather.

Whilst the retraction in the housing market clearly changed the way it operates, the same challenges would undoubtedly return without the Home Report. For example, without the Home Report valuation the temptation would be to return to low upset prices as demand increases.

### **Q3) Should the Home Report play a more central role in promoting energy efficiency and property condition improvements among home owners?**

Yes.

We asked SDEF members if they thought energy efficiency should have a greater prominence in the report and 78% thought it should.

Those who responded 'yes' gave opinions such as

- 'If people have gone to the expense in both finance and time to improve their property's energy efficiency then it is important that this is recorded'
- 'Keeping warm is an essential when disabled, yet with heating costs increasing, insulation is vital'
- 'It will be the [main] ongoing cost of running house'

One respondent who answered 'no' thought that energy efficiency 'is already strongly promoted in the home report and in many schemes'.

The issues raised in the consultation document regards sustainability seem to relate solely to energy efficiency. SDEF believes that for a house to be sustainable it must meet the needs of all buyers. With an increasingly older and more disabled population we believe access should also be a higher priority.

We also, therefore, asked whether the accessibility audit should be promoted more strongly in the Home Report. Nine out of ten (89%) respondents thought it should be, with comments including:

- 'Access parts do not necessarily stand out to people in the Report. Lots of awareness in public about the energy efficiency parts and why that is being promoted, but much less info about why access is important!'
- 'If a house is not access able then the purchase of such a property could become a liability in time.'
- 'It is very important for disabled people to know if a home will be accessible for them to live in.'
- 'Owners don't [enough] give weight to it!'

#### **Q4) Should a national register of Home Reports be established?**

Yes.

86% of the respondents to our survey thought a national register should be produced.

SDEF believes that a national register would be an invaluable tool for assessing the accessibility of Scotland's private sector housing stock. Social housing accessibility is currently monitored, for example, through the APSR process for RSLs. No similar process exists for private housing; such a resource would be of great value to local authorities performing their housing need and demand assessments.

What little evidence there is suggests a problem exists relating to housing accessibility. We know, for example, from Scottish House Condition Survey 2012 findings that one in five disabled people who require adaptations live in a home that is not very, or not at all, suitable for them. This survey is not, however, sufficiently detailed or robust to identify why this may be and in what sector the main issues lie.

## **SECTION 2**

#### **Q5) Do you think the upfront cost of Home Reports is preventing potential sellers from putting their property onto the market?**

Yes.

Three in five (59%) of those responding to this question thought that the cost could be an issue. One person reported having been discouraged from selling in the poor housing market because of the cost. Others were simply concerned about it deterring people from marketing a home, particularly those selling due to financial problems.

There was also an opposing view that it was just one of many costs that had to be budgeted for when buying a home. There was support for measures that would see the cost recouped from the sale price.

One respondent thought that 'the home report is expensive - years ago you would have paid that price for a full surveyors report with an actual valuation costing much less. If a category 3 is on the report a potential

buyer may have to pay out even more money to find out how much work needs done before they can decide whether to buy.'

**Q6) Are you aware of any schemes available (e.g. deferred payment) to help potential sellers to pay for home reports?**

No.

**Q7) Are there any issues with the majority of Home Reports being commissioned through selling agents?**

No.

**Q8) Should other organisations be allowed to carry out the Single Survey (including valuation) and/or the Energy Report?**

No.

Seven out of ten (70%) respondents thought the existing arrangements were sufficient. There was some support for independent access auditors performing the accessibility audit. SDEF recognises the value in this, but also that this could increase costs as the chartered surveyor, who currently performs the assessment, would still need to access the property.

**Q9) In your experience is the requirement for a home report before marketing a property leading to delays in properties coming onto the market?**

No.

**Q10) Are home reports a useful marketing tool for sellers?**

Yes.

The Home Report has a particularly valuable role in relation to the marketing of the accessibility of homes. Anecdotal evidence suggests that estate agents and solicitors are wary of highlighting a property's accessibility. This is due to a fear that when they are trying to sell a dream of future happiness and wellbeing, highlighting accessibility could focus a seller on illness and disability.

The Home Report requires that all properties have an accessibility audit so no single property can be seen in a negative light due to it having more features useful to a disabled or older person.

**Q11) Is the 12 week deadline for marketing a property after completion of a home report appropriate and reasonable?**

Yes.

**Q12) Is the 28 day provision for removing a property from the market without requiring a new home report appropriate and reasonable?**

Yes.

**Q13) Are there any issues with potential buyers accessing home reports?**

No.

Two-thirds (64%) of the respondents to our survey thought that there were no issues.

**Q14) Is [the enforcement by Trading Standards Officers] the most appropriate way to enforce home report legislation?**

Yes.

**Q15) What are your views on mortgage lenders' acceptance of home report valuations?**

None.

**Q16) Are the re-dress options available to buyers reasonable and appropriate?**

Yes.

**Q17) Do [the exceptions to the need for a Home Report] need to be amended?**

No.

### **Section 3**

#### **Q18) Does the single survey element of the home report provide an appropriate and useful level of information?**

Yes.

We asked our members about both the house condition survey and accessibility audit. We were disappointed to see that the general public were not asked their views on the latter whilst being asked their views on all other sections of the Home Report.

In relation to house condition survey, two thirds of SDEF members (65%) thought the information was sufficient to support a purchase. SDEF is particularly supportive of one member's comment that 'There needs to be an Executive Summary/Easy Read summary of the main areas for buyers to review (the whole document is very difficult to access quickly). Maximum one A4 sheet with Main points as follows: - valuation - major defects/repairs (category 2&3) - energy overview - disability access overview.'

Those who answered 'no' to this question gave comments including:

- 'The age of all integrated appliances central heating and boiler should be included.'
- 'Information is useful to a limited extent, as survey is too superficial.'
- 'There are cases where opinions are given only vague and you still have to get specialist report.'

In relation to the sufficiency of the accessibility audit, again two thirds (63%) thought it provided an appropriate and useful level of information. Comments included:

- 'The information given is practical, useful, stuff for the majority of people. However the access parts are not marketed enough to the public in the way that energy efficiency is - the value of the access info should be more widely promoted as useful.'
- 'This is a necessity for all buyers who need to think for the future as well as the present when some of the [accessibility audit items] may become a priority'

- ‘Yes, the questions asked are very relevant!’

Those who thought more information was needed suggested the following:

- ‘Specify one step rather than three’ [in the question ‘Are there three steps or fewer to a main entrance door of the property?’]
- ‘Should also ask whether there is a designated disabled parking space within a certain distance of the main entrance door.’
- ‘More specific information should be provided for the access into the specific house/flat and not to an external door.’
- ‘Needs more info regards wheelchair accessibility & space for a wheelchair in a bathroom.’
- ‘More information about the cost of parking and whether motion detected public lighting is installed.’

**Q19) Should the repairs categories in the single survey be amended to make them consistent with the categories used in the Scottish House Conditions Survey?**

Yes.

As with the answer to question 4, we believe Home Report data should be used to develop a statistical resource where possible. Aligning repair categories therefore makes sense.

Unfortunately, the Scottish House Condition Survey does not collect useful information about accessibility. Unlike the Home Report, the information gathered primarily covers adaptations. For this reason, the Home Report accessibility categories should not be changed to match the Scottish House Condition Survey as this would downgrade the value of the information provided.

**Q20) Is the valuation element of the single survey a useful element of the home?**

Yes.

**Q21) Is the information provided in the energy report appropriate and useful?**

Yes.

One of those responding to our survey commented that the 'Energy Efficiency Report in practice, lacks detail - it is not extensive enough and owners seem unable to provide a fair survey.'

**Q22) Is the information provided in the property questionnaire appropriate and useful?**

Yes

There were, however, concerns about the reliability of the information contained within it that related to fear that sellers could be less than truthful.

**Q23) Should an additional question on land maintenance fees be added to the Property Questionnaire?**

Yes.