



DCHI response to the guidance on Buying and Selling Homes during this stay-at-home period

Finally, a glimmer of light from the Ministry of Housing, Communities and Local Government, (MHCLG) but it is still just a glimmer. This guidance is rather late in coming, doesn't go far enough and indicates limited concern for the health risks to energy assessors whose industry sector they are responsible for. I suppose this is partly because they have been challenged as a department by so many leadership changes. It seems they have never been able to keep anyone at the helm long enough to get to fully understand all the services they are responsible for.

Still, progress is progress, however small.

I am referring to the "Government advice on home moving during the coronavirus (COVID-19) outbreak". Whilst I am addressing this in the specific context of energy assessors, the same principles apply to anyone whose job requires them to carry out work in other peoples' properties. For other trades and professions different regulations will be applicable.

<https://www.gov.uk/guidance/government-advice-on-home-moving-during-the-coronavirus-covid-19-outbreak>

I will start by addressing the "Advice to the public"

The nearly good bit is

Getting your home onto the market may be more challenging than usual in this period. There should be no visitors to your home. You can speak to Estate Agents over the phone and they will be able to give you general advice about the local property market and handle certain matters remotely but they will not be able to start actively marketing your home in the usual manner.

If you are thinking about selling, you can use this time to start gathering together all of the information you will need to provide to potential purchasers.

Advice for people to stay at home and away from others means you should not invite unnecessary visitors into your home, including: Property Agents to carry out a market appraisal or take internal photographs prior to marketing your home; and Energy Performance Certificate assessors.

Unfortunately, the above advice is given in the context of "If your home is not yet on the market". This completely misses out homes already on the market without an Energy Performance Certificate (EPC), non-marketed sales and EPCs required for other purposes such as refinancing or compliance with the Private Rented Property (PRS) regulations. It also completely ignores EPCs for non-domestic properties.

The DCHI view is that for the duration of the crisis, the guidance above should apply to all existing buildings, domestic or non-domestic. Also, it should apply whether or not the property is on the market. The only EPCs that can currently be produced safely are newbuild / Part L compliance ones which do not require a site visit.

What MHCLG needs to do, and should do without further delay, is to initiate temporary legislation that suspends the need to comply with the Energy Performance of Buildings (EPB) Regulations for existing buildings during the peak of the pandemic. This should not be a get out of jail free card, it should be a clear deferment of the requirement so that the compliance has to be achieved retrospectively within (say) 28 days of lifting the suspension. The EPCs will still be required as soon as it is safe to do the surveys required to produce them.

This needs to be supported by a similar deferral of the requirements of the PRS regulations which means cooperation between MHCLG and the Department for Business, Energy and Industrial Strategy (BEIS). We live in hope that one day this sort of cooperation will happen and today should be that day.

To put this into context

The government claims to be intent on taking firm action to stop as many interactions as possible that have the potential to transfer infection from one household to another. Energy assessors are people with homes and families.

An energy assessor can carry the infection for 5 days (apparently) without having any knowledge of it. During that time, they can visit multiple homes and/or businesses transferring the infection as they go. Let us not lose sight of the fact that we are not leaving a parcel on the doorstep, we are going into the building for a significant period of time and we are entering every room in the building.

Even if the assessor left home without the infection, by the end of the day they could have picked it up somewhere, transferred it to somewhere else and brought it home with them. We can easily hit our quota of passing it on to 3 people in just one day. That is why we should be staying at home, protecting the NHS and saving lives. (Or as many of our members have already done, signing up for the NHS Volunteer Responders or other local support groups so we can provide a service that is essential now; but one that can be done maintaining social distancing, including not unnecessarily entering other people's homes or business premises).

Looking at the “Advice to industry” section

Although the above mentions Energy Performance Certificate assessors there is no specific guidance for us. There is guidance for “surveyors” which we assume is supposed to include us. It is however a term that MHCLG has always avoided using for energy assessors so we cannot be sure.

Surveyors should not expect to carry out non-urgent surveys in homes where people are in residence, and no inspections should take place if any person in the property is showing symptoms, self-isolating or being shielded. It may be possible to carry out some of your work online and also carry out urgent surveys on empty properties, or those where the occupants are out of the property or following guidance to stay at home and away from others.

Surveyors should follow the latest Government guidance which currently (26 March 2020) states that work carried out in people's homes can continue, provided the tradesperson is well and has no symptoms of coronavirus (COVID-19).

It is important to ensure Government guidelines are followed, including maintaining a 2 metre distance from others, and washing their hands with soap and water often for at least 20 seconds (or using hand sanitiser gel if soap and water is not available).

No work should be carried out by a person who has coronavirus (COVID-19) symptoms, however mild.

The obvious bit of nonsense is “*should not expect to carry out non-urgent surveys in homes where people are in residence*”.

- 1) What we “expect” is irrelevant. Either we should or we shouldn't – and clearly we shouldn't.
- 2) A “*non-urgent survey*” is a meaningless expression unless there is clarity over what is urgent. Producing an EPC during a pandemic is not necessary unless the government choose to make

it so. If no new marketing can occur, then relaxing the requirement to comply with the Energy Performance of Buildings Regulations (EPB) for properties already marketed for the duration of the peak of the pandemic temporarily would make many EPC surveys non-urgent. Delaying the compliance date for the PRS regulations from 1st April would deal with the rest. This would allow us to stop being part of the mechanism for spreading the virus.

- 3) We cannot agree with the advice that “*work carried out in people’s homes can continue, provided the tradesperson is well and has no symptoms of coronavirus (COVID-19)*”. Our assertion is that this advice is at least 10 days out of date.

This is because a) the tradesperson can (apparently) be spreading the virus for around 5 days before becoming symptomatic and b) the figures the government are using are today’s.

As an outsider looking in, it seems clear that the “true” number of cases includes around 5 days of infections that are not as yet showing symptoms, so are not yet being picked up anywhere. The forthcoming deaths from existing infections will be proportional to that higher figure, but many will not be occurring for at least another 5 days. To prevent a death on any given day, you would need to have stopped the contact that transmitted the infection at least 10 days earlier.

The government appears to be introducing preventative measures timed to match the curve of the disease in the UK. To impact the spread appropriately we need to be introducing measures timed to match the curve of the disease in a country at least 10 days ahead of us. Essentially, most of the infections that will put us where Italy and Spain are now, have already happened. Contact we stop now will be preventing it getting worse than that.

We should have stopped all travel to all non-essential work 2 weeks ago. We need to stop it now to protect the NHS from further overload in 10 to 14 days’ time when it will already be stretched beyond capacity. This is not “science” and I may be misjudging the time frame by a few days. It is however “common sense”. You start slowing down when you see the brake lights of the cars in front. You don’t wait until you can see what they can see because by then it is too late to avoid crashing into the back of them.

It seems unconscionable for the government to still be allowing anyone to enter multiple homes and/or workplaces for anything other than essential and time critical reasons. (This is not just energy assessors but all trades and professions that require property visits).

In summary

The government advice that people should stay at home except for a specific set of circumstances which includes essential travel only, is good advice. It is however time for them to wake up to the fact that travel to non-essential work is non-essential travel and that what is essential during the crisis is a lot less than was essential before it, and will become essential again afterwards.

The fundamental principle here is simple. If you need us to “*stay at home, protect the NHS and saves lives*” then stop perpetuating a need for us to go out and do what at the height of a pandemic is work that can wait until later.

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DCHI is a leading association for Energy Assessors, Green Deal Advisors & Residential Property Surveyors
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