

## Overview

- **Electrical Safety First is the consumer charity dedicated to preventing deaths, injuries and fires caused by electricity. We work with tenants, landlords and homeowners to reduce deaths and accidents in the home.**
- We welcome the opportunity to respond to the Scottish Government's consultation on short-term lets. Whilst we recognise the value that short-term lets provide to the economy, it's not surprising that many communities in Scotland are concerned by the relentless rise of this new accommodation model. **Last year, a report prepared for the Scottish Government showed that Airbnb listings for whole properties alone had almost tripled in 12 months.**
- The rapid development of internet platforms has allowed landlords to establish new ways of maximising rental incomes. But in some areas, local residences will soon be outnumbered by the number of short-term lets available. This can not only have a profound impact on the cultural, social and economic aspects of many communities – from rising house prices to anti-social behaviour - **it also raises significant safety issues.**
- We therefore concentrate our comments to Question 11 of the consultation paper which specifically asks about safety issues relating to short-term lets, and relates to the remit of Electrical Safety First.

## Question 11: Do you have any comments on safety issues related to short-term lets?

- **Electrical Safety First believes that short-term lets should be required to meet the Repairing Standard which includes a requirement to complete mandatory five-yearly electrical safety checks.**
- During 2017-18, official statistics show there were nearly **ten fires a day caused by an electrical source - 3,426 in total, accounting for 75% of all house fires.** This percentage has remained at similar levels over the last five years whilst the overall number of domestic fires has slowly fallen.
- In the last couple of years, the Scottish Government has led the UK in protecting private tenants by requiring regular electrical checks, by a registered electrician, in all privately rented homes. **But the legislation doesn't cover social housing or owner occupied properties. And the situation becomes even more complex when looking at short-term lets.** For example, Airbnb and similar platforms offer a range of rentals with different tenures, from those where the owner-occupier is still in residence, to 'whole home' lets.
- In Scotland, the Tolerable Standard is the absolute minimum standard for all housing. It requires a house to have an 'adequate and safe to use' electrical installation (i.e. the wiring and fittings). But privately rented homes are subject to the Repairing Standard, **which involves a compulsory electrical safety inspection and a requirement that any furnishings and appliances supplied by the landlord are safe.**
- **However, these legal obligations are not necessarily undertaken, or enforced, when a property is rented through a series of short-term lets** which is worrying given the growth of the sector, and evidence pointing to private landlords choosing it as a more viable rental option.

- **Our campaign *Inequality Street* aims is to ensure that everyone in the country, no matter what type of accommodation they live in, is electrically safe in their own home.** We want to see a common electrical safety standard for all Scottish housing, as ‘Inequality Streets’ really do exist - where one resident might be much better protected from electrical risk than their neighbour next door.
- And while owner-occupiers can choose the level of risk in their homes the decision doesn’t exist in isolation – particularly when considering tenements and flats, as the tragedy of Grenfell clearly illustrates. **The risk of fire is also likely to be increased if a property has a high turnover of residents and lacks regular electrical safety checks.**
- **We believe that short-term lets should be required to comply with the requirements of the Repairing Standard which would provide a fair and consistent level of electrical safety across all private lets.** Enforcement of the measure could be undertaken by the First-tier Tribunal Housing and Property Chamber.

**For further information, please contact:**

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