

Renters' Rights Bill: Call for Evidence

Cats Protection Submission

About Cats Protection

Cats Protection, the UK's largest cat welfare charity, helps tens of thousands of cats every year. Our campaigns change laws to give cats more protection and we continue to call for a better deal for cats.

Summary of Cats Protection's position on the Renters' Rights Bill

- **Cats Protection has been calling for legislative reform to enable those renting in the private sector to benefit from the companionship of pets.**
- **Cats Protection's Cats and Their Stats (CATS) report 2024¹ found that over half a million households who would like a cat don't have one because their rental agreements forbid it.**
- **We welcome the proposals in the Renters' Rights Bill which would give tenants the right to request a pet in their property, which the landlord must consider and cannot unreasonably refuse.**
- **The proposal to enable landlords to require tenants to take out insurance against pet damage, will only work if the insurance market is ready to meet demand competitively once the measures come into force. We need assurances from the government that this will be the case. Additionally, where an insurance claim is made, the landlord must not be able to 'double claim' on both the security deposit and insurance for the pet-related damage**
- **The government must also commit to working with animal welfare organisations to ensure that there is suitable guidance regarding the basis on which a decision to allow a pet can be considered unreasonable.**
- **Further clarity is needed regarding the position where a landlord does not respond to a tenant's request. We believe that an absence of response should be deemed to be consent to the request.**
- **Again, further clarity is needed where for example a landlord attempts to withdraw consent already granted. We believe that once consent has been given, it cannot be withdrawn unless the legislation sets out an exhaustive list of situations where consent could be withdrawn, and one or more of those applies. Withdrawal of consent for any other reason should be unlawful.**

1) Background

- i) England is a nation of animal lovers, and the companionship offered by pets should not be a privilege limited to those who own their own homes.
- ii) In 2023, Cats Protection took in the equivalent of around three cats each day due to landlords not allowing them in their properties.
- iii) In 2018, Cats Protection launched its Purrfect Landlords campaign to help more responsible tenants in rented housing to own a pet cat. We called for a pet clause in housing tenancies; we were delighted when the Government accepted this proposal by updating their Voluntary Model Tenancy Agreement. However, only 23% of landlords are aware of this update to the Model Tenancy Agreement. Legislating will ensure that all those responsible for placing tenants are aware of the right to request a pet.

¹ [Cats Protection, Cats and Their Stats Report 2024, p67 &p73](#)

- iv) A 2021 survey of landlords, letting agents and tenants on pets and rental properties, conducted by YouGov on behalf of Cats Protection and Dogs Trust found that 33% of private landlords who don't currently allow pets in any/all of their properties say nothing would persuade them to do so. This demonstrates the need for the legal framework to actively encourage landlords to see the benefits of pet ownership for responsible tenants while also providing mechanisms to protect their investment. The survey also found that:
- 46% of landlords say they will allow pets, however, only 9% of owners say their properties were advertised as pet-friendly.
 - Damage to the property is the main reason for not allowing pets but yet 73% of landlords who allowed pets have reported no problems.
 - 94% of tenants say their cat has some form of positive impact on their life.

2) Benefits of pet-friendly private rented housing

- i) Allowing tenants in rented accommodation to keep a pet has a positive impact on the tenant's life and is likely to result in longer-term tenancies thereby benefitting landlords by increasing rental income security.
- ii) Pets can play an important role in helping their owners overcome loneliness and engage with their communities which in turn promotes social cohesion and integration.
- iii) Encouraging landlords to allow pets will also mean fewer animals will be needlessly relinquished from their loving homes to organisations such as Cats Protection due to difficulties with rented accommodation.

3) Helping Landlords understand the reality of allowing pets

- i) Some landlords may be nervous about the idea of a pet in their property, especially if they are not experienced pet owners themselves. In order to help reassure landlords about the behaviour of a cat, and the ease with which it can be accommodated without causing damage, Cats Protection has designed a 'Pet CV'. This can be filled out with information about the requested pet, references from previous landlords, details of vaccinations etc.

A new piece of legislation must deliver for pets, pet-owners and landlords

4) A right to request a pet

- i) Cats Protection supports proposals which would give tenants a right to request a pet, which should not be refused unless there are reasonable grounds for doing so. We feel this strikes the right balance for tenants, pets and landlords. Guidance will be key to assisting both tenants and landlords with interpreting what constitutes an "unreasonable" refusal.
- ii) Cats Protection believes it is important that a cat is kept in a property that is suitable for its needs but at the same time, the Charity does not believe that any property should have a blanket 'no-pet' policy because of its size, location or outdoor space as there are always cats in need of adoption with specific needs for example cats which need to be kept indoors. Rather, as the proposal is currently drafted, landlords should consider requests on a case-by-case basis. The Bill, or its accompanying guidance, must also be clear that a positive response to a pet request cannot later be rescinded.
- iii) Cats Protection believes that for those requesting to keep a single cat, that request will nearly always be reasonable unless there are specific reasons why a particular property is unsuitable for the pet requested.

5) Prospective tenants

- i) Consideration should also be given to how the proposed framework can ensure that prospective tenants are also able to request a pet. This would help those who need to move

and who already have a cat to find a new tenancy much more easily. If landlords are able to turn down tenants with pets, with no obligation to consider the request, then the private rented sector will continue to lock out pet-owners leaving charities such as Cats Protection continuing to see cats coming into care in heartbreaking circumstances simply because their owner(s) could not find a new tenancy at which the pet was welcome. Currently, the Bill does not enable provide any peace of mind, for prospective tenants, that they can bring their pet with them.

- ii) Cats Protection runs a service called Lifeline which assists those fleeing domestically abusive situations to get to safety by temporarily taking care of their cat until the time they can be reunited in safe pet-friendly accommodation. With pet-friendly accommodation so hard to find, it is taking longer than it should do, for victim-survivors and their pets to be reunited. In some heartbreaking cases, victim-survivors are making the incredibly difficult decision to relinquish their pet because they are unable to find suitable pet-friendly accommodation. This has a huge impact both on the animal and its family – In the charity’s experience the reunion can be central to healing from the trauma of domestic abuse.

6) Freeholds

- i) Cats Protection also believes that, in cases where there is a superior landlord, the right to request a pet should apply in the same way and be passed up that chain. Issues around existing building insurance which contains for example ‘no-pet’ clauses should not be considered reasonable grounds for refusal. Without requiring the same consideration from freeholders, tenants will find themselves discriminated against in relation to whether they can have a pet on the basis of whether or not they happen to be renting a property where there is a superior landlord.

7) Insurance and deposits

- i) In terms of security for the landlord, the Bill contains a provision enabling landlords to require the tenant to take out additional insurance to cover any damage caused by pets. This will only work if there are a range of suitable products on offer, ensuring a competitive marketplace, at the time this comes into force. Additionally, where an insurance claim is made, the landlord must not be able to ‘double claim’ on both the security deposit and insurance for the pet-related damage and the Bill and its accompanying guidance must be clear that double recovery is not allowed.

8) What constitutes ‘unreasonable grounds’ for refusal

- i) It will be imperative to ensure that there is suitable guidance accompanying the legislation which sets out what would constitute unreasonable grounds for refusing a request to have a pet. While it would not be possible to produce an exhaustive list, the examples must be sufficiently clear in order to assist both landlords and tenants understand what the legislation anticipates.

9) Challenging landlord decisions

- i) The Bill is unclear regarding the process for challenging decisions where a landlord has refused a pet, and the tenant believes this is unreasonable. Clause 16B(5) of the Bill refers to court proceedings rather than to the Ombudsman which is discussed throughout other sections of the Bill. Cats Protection believes the Bill must set out clearly the process for challenging a decision and this must be a swift process which does not incur costs to the tenant. Additionally, the proposals must set out the process for situations where a landlord has accepted a pet but then subsequently withdraws that consent.

10) No response should be deemed consent

- i) The Bill is silent regarding situations where a landlord fails to respond to a request to have a pet. Cats Protection believes that such situations must be treated as agreement to the request. If the landlord had any objections there is no reason why they could not make this known. The Bill must be clear on this.

11) Withdrawing consent

- i) Once a request has been made and accepted, the landlord should not be allowed to withdraw unless there are serious and compelling grounds for doing so – for example, if there has been a criminal conviction relating to the behaviour of the animal. The Bill must set out any such circumstances and be clear that they are exhaustive and that withdrawal of consent for any other reason is unlawful.

12) Commencement

- i) Cats Protection believes that it is important that the pet clause is commenced at the same time that the Bill is enacted to address the issues raised in this briefing as quickly as possible.