

Evidence submitted by CIH Scotland 28 February 2020

About CIH

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple – to provide housing professionals with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world including over 2,000 in Scotland.

Further information is available at: www.cih.org

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1. Introduction

CIH Scotland welcomes the opportunity to respond to the Scottish Government's discussion on Housing to 2040. The fact that the Scottish Government has instigated a conversation about the long-term future of the housing sector in Scotland is encouraging, but this discussion must be followed by concrete actions which can be sustained beyond five-year Parliamentary cycles. In some cases, such as the stated intention to break the link between housing and wealth, these actions may be difficult or unpopular. But, as the Scottish Government notes, radical changes are required to create the future we want to see.

Housing, first and foremost, is a human right and every person must be entitled not only to a home, but to a home that meets their needs. We are pleased that the importance of housing has been acknowledged by the Scottish Government in its commitment to rapid rehousing and Housing First with a view to eventually eradicating homelessness in Scotland. The current 50,000 affordable homes target and guaranteed funding over a five-year period also signalled a welcome change in approach to affordable housing supply.

However, the sector still has no guarantee of long-term funding beyond 2021. The Scottish Government's announcement¹ that £300 million will be made available to deliver affordable homes in 2021-22 is certainly welcome but constitutes a significant reduction in funding. Housing must be seen as an essential service and a safe investment backed by guaranteed long-term funding.

In developing this response, we gathered input from our members and our CIH Scotland Board and we listened and contributed to roundtables and discussions with our colleagues and stakeholders from across the housing sector, health and social care and the third sector. We organised workshops in Inverness, Dumfries and Fife and gathered feedback through four online surveys, each focussing on a different aspect of the draft vision. In total, through the workshops and surveys, we received over 200 responses which are reflected in this submission.

This submission is structured under the four sections of the draft vision which we used as the basis for our discussions at the workshops and for the online surveys:

- A well-functioning housing system
- High quality sustainable homes
- Sustainable communities
- Homes that meet people's needs

We note that the consultation document specifically calls for views and ideas relating to:

- The vision and principles;
- Increasing affordability of housing;
- Increasing the accessibility and functionality of housing;
- Increasing energy efficiency and reducing the carbon emissions of housing;
- Improving the quality, standards and state of repair of housing; and
- Improving the space around our homes, promoting connected places and vibrant communities.

All of these themes came through in our discussions and surveys and are covered below.

¹ <https://news.gov.scot/news/investing-in-affordable-homes>

2. The vision and principles

We welcome the Scottish Government's attempt to develop a long-term vision for housing and we hope that this will result in cross-party commitment to creating a housing sector that supports everyone, whatever their needs are now, or in the future. The consultation calls for radical ideas and solutions to the challenges being faced by the housing sector while the Scottish Government has hinted that it may be difficult to maintain current levels of investment in affordable housing supply.

While we agree that there is some scope for efficiencies within the social housing sector – better partnership working and smart procurement could help to bring down costs in some areas – we need to recognise the value of investing in our housing sector and acknowledge that the cheapest option will not necessarily lead to the best outcomes.

Keeping social housing affordable requires significant up-front investment and relatively high subsidy rates to ensure that rents can be kept as low as possible. A recent publication from the Joseph Rowntree Foundation² has shown that the higher proportion of affordable housing in Scotland compared to the rest of the UK has contributed to lower poverty rates. Continuing to invest in affordable housing will sustain and increase this positive impact.

Housing, first and foremost, is a human right and we must ensure that everyone has access to a home that they can afford and that meets their needs. As well as providing the basis for a good quality of life for everyone living in Scotland, good quality housing contributes to ambitions across Government portfolios. Investing in housing and housing services:

- Alleviates poverty and reduces inequalities;
- Helps to tackle homelessness;
- Improves health and wellbeing, saving money for the NHS;
- Helps to reduce reoffending;
- Helps to reduce fuel poverty;
- Reduces carbon emissions, contributing to climate change targets; and
- Creates skilled jobs and boosts the economy.

While there is nothing within the Scottish Government's draft vision and principles that we would fundamentally disagree with, the document lacks clarity, particularly around how these ambitions will be achieved. It is also unclear what the purpose of the vision and principles will be going forward and how they will feed into policy development.

Recommendations: the vision and principles

Housing, first and foremost, is a human right.

Housing must be seen as an investment, not a cost that should be minimised.

The Scottish Government should recognise affordable housing as “an investment in the people of Scotland”, as social security is recognised in the principles set out in the Social Security (Scotland) Act 2018.

We need all political parties to commit to long-term investment in affordable housing to create certainty for social landlords and investors.

² <https://www.jrf.org.uk/report/poverty-scotland-2019>

3. A well-functioning housing system

Continuing to invest in social and affordable housing supply

Following the loss of 500,000 homes through Right to Buy and planned demolitions and disposals of homes no longer fit for purpose, we are just beginning to see a rise in the number of badly needed affordable homes. Social housing in Scotland currently accounts for about 23 percent of all homes, a significant reduction from over 50 percent local authority housing in the 1970s³. Without a long-term financial commitment, local authorities and housing associations simply will not be able to continue building and we risk losing the progress made to date.

In the initial discussion paper, Housing Beyond 2021⁴ the Scottish Government states that:

“The current level of spend would be challenging to sustain but the delivery of more affordable homes is essential as a key part of meeting the policy challenges above. A further 50,000 affordable homes target for the next Parliament would cost £4 billion. And even this level of investment would not be sufficient to meet Scotland’s housing needs.”

The suggestion that investment in affordable housing could be cut when there is a clear need for more affordable homes is deeply concerning. The suggestion seems to be that social landlords could deliver more homes with less subsidy which risks increasing rents or possibly a shift towards tenures such as Mid Market Rent (MMR) which require less subsidy but at a higher cost to tenants.

While we agree that there is a place for MMR and other types of affordable housing, these tenures serve a different purpose than social housing and are aimed at a different type of customer, remaining out of reach for many people receiving benefits or on low income.

A recent report by the Joseph Rowntree Foundation showed that lower levels of poverty in Scotland compared to the rest of the UK can be attributed to a higher proportion of social housing⁵.

CIH Scotland, Shelter Scotland and SFHA will publish research in March 2020 setting out the number of new affordable homes required over the next five years to meet backlog and future needs.

Investing in affordable housing also generates significant benefits for the economy. Each new home built in Scotland supports four jobs across the economy (over 80,000 jobs in total each year), and home building in Scotland contributes around £570 million to government finances each year.

In addition, the cumulative impact of the 50,000 affordable homes will raise around £50 million in additional council tax revenue and £150 million in rents each year once complete. The total of social housing investment in the construction sector over the same five-year period will equal around £11 billion. In total, there are 12,000 more jobs and a £1.4 billion net economic contribution as a result of the current programme.

³ Chartered Institute of Housing (2019) *UK Housing Review*

⁴ <https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2018/09/housing-beyond-2021/documents/housing-beyond-2021-discussion-paper/housing-beyond-2021-discussion-paper/govscot%3Adocument/Housing-Beyond-2021-Sep.pdf>

⁵ <https://www.jrf.org.uk/report/poverty-scotland-2019>

Recommendations: continuing to invest in social and affordable housing supply

Subsidy levels must be maintained at least at current rates to ensure rents remain as affordable as possible.

Subsidy levels should reflect the acknowledged need for more accessible housing to support unmet need for people with mobility issues and to support our ageing population.

The Scottish Government must base affordable housing targets on need backed by evidence, not how many “units” can be delivered within a certain timescale or within a certain budget.

The Scottish Government’s Affordable Housing Supply Programme should continue to prioritise social housing and maintain at least 70% of the target as social housing.

What do we mean by ‘affordable’?

We asked our members and other stakeholders whether there is enough distinction between ‘social housing’ and ‘other affordable tenures’. The overwhelming majority thought that the use of the word ‘affordable’ is confusing, particularly for members of the public and that it is losing its meaning. A lot of homes that are defined as ‘affordable’, such as MMR homes, are not affordable for many households.

Research commissioned by CIH Scotland in partnership with Wheatley Group in 2017⁶ involved interviewing current MMR tenants and prospective tenants about their understanding of and attitudes towards MMR. The research found that most current MMR tenants who took part in the study ended up in their home by chance and had little knowledge of what MMR was before making an enquiry. MMR was not necessarily perceived as a cheaper option than private renting but as good quality new build housing. Some mistakenly thought that MMR offered greater security of tenure than private renting when in fact, MMR is let on the same tenancy as a private let.

Recommendations: what do we mean by ‘affordable’?

Members of the public need greater clarity about different housing tenures. Promoting different tenures may help people to consider different options and lead to a culture shift away from home ownership.

Ensuring private rents are affordable

The private rented sector (PRS) in Scotland has grown significantly as a proportion of the housing sector from 5 percent in 1999 to 14 percent in 2018⁷. With more people living in the PRS for longer, political attention quite rightly has focussed on increasing security of tenure through the new Private Rented Tenancy (PRT), limiting rent increases to one per year and introducing discretionary powers for local authorities to apply to cap rent increases in specified Rent Pressure Zones (RPZs).

However, the strict criteria and lack of robust data on private sector rents means that to date, no local authority has been able to make an RPZ designation.

⁶<http://www.cih.org/resources/PDF/Scotland%20Policy%20Pdfs/Mid%20market%20rent/Housing%20need%20and%20aspiration-%20the%20role%20of%20MMR%2010%2003%202017%20FINAL.pdf>

⁷ <https://www.gov.scot/publications/scotlands-people-annual-report-results-2018-scottish-household-survey/>

While the average private rent for a two-bedroom home in Scotland has increased by over 21 percent between 2010 and 2018, this increase has not been uniform across Scotland. During this time, only Lothian, Greater Glasgow and Forth Valley saw rents increase above inflation⁸. In these ‘hot spot’ areas, affordability is a real issue, but such concentrations of high rents suggest that a blanket approach to rent control may not be necessary.

The rise of online platforms, such as Airbnb, has also been recognised as contributing to affordability issues. We welcome the Scottish Government’s recent announcement introducing powers for licensing and short-term let control zones⁹. However, these can only be effective with adequate resource for enforcement.

Research first published by CIH in 2016¹⁰, and more recently updated by the Scottish Government¹¹, shows a significant affordability gap in the PRS for people claiming benefits. UK Government welfare reform measures have reduced Local Housing Allowance (LHA) from the 50th percentile to the 30th percentile of local rents and frozen LHA completely since 2016. The result has been that only 11 out of 90 LHA rates cover 30 percent of the local market and some households could experience weekly shortfalls of over £100 for a four-bedroom home. The UK Government announcement¹² that the freeze will be lifted in April 2020 will do little to bring LHA back in line with the actual cost of renting.

While we agree that slowing down or limiting rent increases in some areas is necessary, rent caps may not be the best or only answer. The Scottish Government should pursue a range of interventions.

Recommendations: ensuring private rents are affordable

A rent capping power should be available that is functional where this is deemed necessary. This could be a review of the existing RPZ rules to allow the legislation to function as intended or investment in gathering the data necessary for the current requirements to be fulfilled.

Restrictions on short-term lets must be backed by the resources to enforce them.

Scottish Government must continue to work with the UK Government to bring LHA rates back into line with the actual cost of renting.

Increasing the supply of housing, particularly social and affordable tenures, in areas of high demand, will help to reduce pressure on the housing market and bring costs down.

Housing as a home not an unearned wealth creator

Homeownership remains the largest tenure in Scotland and also the tenure that most people aspire to. However, while some people are locked out of homeownership, it can increase the divide between the “haves” and the “have nots”.

We asked our members if the Scottish Government should intervene in the owner-occupied market to slow down house price growth. Just under half who responded said “no” with a narrow majority selecting “yes” or “I don’t know”. However, a lot of comments received were tentatively supportive of an attempt to break the link between housing and wealth. Concerns were not so much aimed at

⁸ <https://www.gov.scot/publications/private-sector-rent-statistics-2010-2018/>

⁹ <https://www.gov.scot/news/regulating-short-term-lets/>

¹⁰ http://www.cih.org/publication-free/display/vpathDCR/templatedata/cih/publication-free/data/Mind_the_gap

¹¹ <https://www.gov.scot/publications/housing-social-security-second-follow-up-paper-welfare-reform/pages/2/>

¹² <https://www.gov.uk/government/news/around-900-000-could-receive-increased-housing-benefit-from-april>

the principle but the practicalities. It was acknowledged that any policy aimed at controlling or reducing housing wealth would be politically unpopular at best and, at worst, impossible to implement.

It must also be acknowledged that some people have invested in housing as part of their retirement or to enable them to pay for care as they get older. Many people may be asset rich but income poor, and they must not be unfairly disadvantaged by any changes.

Scottish Government has already taken steps to intervene in the owner-occupied market with the abolition of right to buy – a statement that said home ownership can be a good thing, but not at any cost. More bold decisions will be needed if fundamental changes to the housing market are to be achieved.

There are two approaches that could be considered. Firstly, the redistribution of wealth already accumulated in housing through taxation could produce relatively quick results, but it may be viewed as being particularly unfair to those who already own a home. Alternatively, taking steps to address inequalities by making ownership more accessible and affordable, for example through increasing supply and moving away from speculative development based on profit, would be a longer-term solution.

With either approach, the Scottish Government must ensure that other options are attractive. The PRS must be well managed with homes that are well maintained and affordable. Increasing the supply of social and affordable housing will allow more households to access good quality, secure homes.

We put forward a number of ideas below, but a common thread running through all of our recommendations is that if radical changes are to be made, the public must buy into the idea. Any attempt to break the link between housing and wealth will also require consideration of whether it is right for the Scottish Government to continue supporting first time buyers through schemes like Help to Buy and the new First Home Fund supporting current prices rather than looking to diversify the market.

Recommendations: housing as a home not an unearned wealth creator

Scottish Government should consider the use of taxation such as Capital Gains Tax to rebalance the housing sector. Proceeds could be ringfenced for spend that would easily demonstrate social benefit e.g. delivery of social and affordable housing or the provision of social care.

The potential for a form of land value tax or land value capture should be explored. This could be targeted to encourage development of derelict land as per the pilot carried out by Glasgow City Council in 2009.

National and Local Government could take more of a role in master planning e.g. acquiring land and offering serviced plots with planning permission.

We must make better use of land owned by public bodies with this being prioritised for affordable housing where appropriate.

Better partnership working

In order to create a well-functioning housing system, we need to form better links between housing, health and social care. The health benefits of access to good quality housing have been well

documented, and the role of housing in tackling loneliness and social isolation is beginning to be better recognised.

The consultation document refers to the challenges of our ageing population and we agree that this is one of the biggest challenges facing the housing sector over the 20-year timescale of this vision. However, despite recognition of the importance of joint working and the introduction of Integration Joint Boards through the Public Bodies (Joint Working) (Scotland) Act 2014, the housing sector is still not as involved as it should be.

We welcome Scottish Government's commitment to establish a working group to consider a homelessness prevention duty for Scotland¹³. Any new duty must include health and social care partners, or it will be a missed opportunity. Housing cannot address homelessness without support from health and social care partners who have a role in identifying and referring those at risk of homelessness and providing support and health services to those who do become homeless to help them settle and maintain a tenancy.

One example of where better partnership working must be developed is in supporting people to live well with dementia. Every person in Scotland who is diagnosed with dementia is entitled to at least one year of post diagnostic support provided by a dementia link worker¹⁴. While the importance of enabling people to live at home with dementia wherever possible is a key outcome of the National Dementia Strategy¹⁵, a diagnosis does not automatically trigger a conversation or assessment of the suitability of the person's home.

Recommendations: better partnership working

Housing should be seen as an equal partner in Integration Joint Boards.

Housing, health and social care staff need to build better working relationships and a better understanding of each other's roles. One example is between housing staff and post diagnostic support workers for people with dementia.

We must move towards real preventative spend where budgets are more flexible and focussed on good outcomes for people, not departmental targets.

Housing as a profession

As the body for professional standards, we believe that there is a need to continually equip housing practitioners, so they have the right knowledge, skills, values and behaviours. The CIH member code of conduct and code of ethics sets clear expectations on our members to continually reflect and update the relevant knowledge and skills they need to deliver excellent services.

However, professionalism does not exist in isolation. It is informed by the practice, the training and learning that housing practitioners demonstrate day in and day out as well as the political, regulatory and commercial environment

¹³ <https://www.crisis.org.uk/ending-homelessness/scotland-prevention-review-group/>

¹⁴ <https://www.alzscot.org/our-work/campaigning-for-change/current-campaigns/5-pillar-model-of-post-diagnostic-support>

¹⁵ <https://www.gov.scot/publications/scotlands-national-dementia-strategy-2017-2020/pages/3/>

To increase professionalism, we are currently working with practitioners and educational institutions to improve access to and content of housing education in Scotland as well as develop a competency framework for the housing workforce.

We believe these steps can further invigorate housing professionalism in Scotland. However, with around 1,900 members across Scotland, we recognise CIH members make up a minority of housing professionals across Scotland and that there is a need to communicate the value of these initiatives to non CIH members.

The Scottish Government's vision that everyone in Scotland should live in high quality, energy efficient homes that are affordable and that meet their needs is one that will only be realised if we have a high performing housing workforce.

As we look towards the challenges of the next two decades in housing, there is a need to attract, retain and develop talented people for a range of roles offered by the sector. Housing education that stretches and develops staff, supported by a competency framework can help practitioners across the sector build the homes and provide the services that tenants and customers expect.

Recommendations: housing as a profession

The Scottish Government should play a role in raising awareness about what it means to be a housing professional - recognising that decisions made by housing professionals significantly affect people's lives.

The Scottish Government should support the creation of a professional competency framework so that practitioners working across all housing tenure can uphold and visibly demonstrate their relevant knowledge, skills and behaviours on an ongoing basis.

The Scottish Government should also lead a review of the impact of mandatory qualifications for some letting agency staff and consider extending requirements for a minimum qualification across the housing sector.

4. High quality sustainable homes

Cross tenure standards

A person or household should be able to expect the same quality of building standards, safety measures and professional management regardless of what tenure they are living in or how long they are staying in a particular home. It is unacceptable that short-term lets through sites such as Airbnb do not have to meet the same safety standards as a residential let or that space and accessibility standards are often higher for tenants of social landlords than for private tenants or homeowners.

A recent example of this disparity was reported in Edinburgh when a landlord was refused a renewed HMO licence but was able to let out rooms in the same property through Airbnb¹⁶. This is not an acceptable situation for our housing sector.

¹⁶ <https://www.scottishhousingnews.com/article/edinburgh-landlord-stripped-of-hmo-licence-but-maintains-airbnb-listing>

If we are to reduce fuel poverty and climate change, minimum energy efficiency measures must be applied to all tenures. Currently, minimum energy efficiency standards apply to the social housing sector and regulations for the PRS are being introduced. However, the issue of standards for homeowners, who make up the vast majority of the housing sector, are just beginning to be considered. The issue of energy efficiency is covered in more detail below.

Recommendations: cross tenure standards

We must continue to move towards equitable building, safety, accessibility and management standards across all tenures.

Energy efficiency, fuel poverty and climate change

The Scottish Government has set ambitious statutory targets to reduce fuel poverty as far as possible (and in any case to no more than 5 percent) by 2040 and to reach net zero carbon by 2045. Housing has a significant role to play in meeting both of these targets.

To date, the social sector has invested significant amounts in improving the energy efficiency of their homes. Between 2015-16 and 2017-18, social landlords invested over £277 million from their own resources towards meeting the Energy Efficiency Standard for Social Housing (EESH)¹⁷. This accounts for around 85% of total spend on EESH. As we now move towards higher standards set out in EESH2, there is a serious risk that without increased grant funding, social tenants will be paying more through increased rents to pay for energy efficiency measures than they are saving through their fuel bills.

To tackle fuel poverty and climate change, we must ensure that our existing homes are energy efficient, that we are investing in new technology to move towards renewable heat and energy and that new homes are being built to a much higher standard. A mix of regulation alongside advice and financial support must be applied across all tenures. The Existing Homes Alliance Scotland has set out a pathway for homes to reach net zero carbon by 2040 highlighting the actions and budgets required to do so¹⁸. The report recommends increasing the budget for energy efficiency measures to at least £240 million per year in the first instance.

In one of our workshop discussions, participants spoke about lack of clear communication from the Scottish Government on the long-term future of fossil fuels. For example, whether gas boilers should continue to be replaced with like for like or alternatives. It was thought that private landlords and owners would have even less knowledge about significant changes that will need to be made over the next two decades to meet emissions targets.

¹⁷ <https://www.gov.scot/publications/energy-efficiency-standard-social-housing-eesh-scottish-government-guidance-social-landlords-revised-february-2019/pages/8/>

¹⁸ <http://existinghomesalliancescotland.co.uk/news/alliance-sets-out-pathway-to-zero-carbon-homes-by-2045/>

Recommendations: energy efficiency, fuel poverty and climate change

Regulation and support must be applied across all tenures to meet minimum energy efficiency standards.

The Scottish Government must clearly communicate future plans for minimum standards and moving away from the use of fossil fuels. People need as much lead in time as possible to be able to make informed decisions about investing in their homes.

The Scottish Government must significantly increase investment to meet statutory targets and ensure that people on low incomes are not made worse off by paying for energy efficiency measures.

Repairing and maintaining our homes

Our housing stock is not in a good state of repair. Tenements and buildings with mixed ownership and absent owners or landlords can present particular difficulties in agreeing and paying for communal repairs. Additional powers such as the power to cover the cost of a missing share included in the Housing (Scotland) Act 2014 appear to have made little difference as the latest Scottish House Condition Survey shows deterioration across all tenures between 2017 and 2018¹⁹.

Poor quality homes are bad for our health and wellbeing, particularly damp or mouldy homes which can cause or exacerbate respiratory illnesses. Poorly maintained homes also risk serious injury from falling masonry which must be addressed before an accident happens.

Under the City of Edinburgh Council's unique Statutory Notice system, the local authority could intervene to organise repairs on behalf of the owners of a shared building. Unfortunately, mismanagement led to the scheme being closed to all but emergency repairs in 2013 and the service has only partially been reinstated since. Despite the problems with Statutory Notices in Edinburgh, the principle was sound. Owners may not know how to organise a repair or be prepared to take the lead on getting quotes and arranging payments from neighbours. In such cases, intervention from the local authority could ensure that vital maintenance was carried out before a building deteriorated to a potentially dangerous state of repair. There may be a case for this system to be revisited, albeit with more stringent checks and balances in place.

The Scottish Parliamentary Working Group on Tenement Maintenance published a set of recommendations²⁰ in May 2019 to improve the condition of buildings across Scotland. Suggestions included the establishment of mandatory Owners Associations, Building Reserve Funds and regular building surveys. It is encouraging that the Scottish Government has responded positively to these recommendations and agreed to support further development of these ideas²¹.

The Value Added Tax (VAT) situation actively discourages repair and renovation of existing buildings while it does not apply to new build homes.

¹⁹ <https://www.gov.scot/publications/scottish-house-condition-survey-2018-key-findings/>

²⁰ <https://www.befs.org.uk/wp-content/uploads/2019/06/Working-Group-on-Maintenance-of-Tenement-Scheme-Property-Final-Recommendations-Report.pdf>

²¹ <https://www.befs.org.uk/policy-topics/buildings-maintenance-2/>

Recommendations: repairing and maintaining our homes

The Scottish Government should prioritise support for implementing recommendations of the Parliamentary Working Group on Maintenance of Tenement Scheme Property.

Consideration should also be given to developing a scheme similar to the Statutory Notice system that operated in Edinburgh prior to 2013.

VAT should not be applied to repairs and maintenance work.

5. Sustainable communities

Transport and infrastructure

A good housing sector extends beyond individual homes. We need to create communities that are well planned and connected, with green spaces that encourage people to be active outside their home. Doing this has the potential to boost both the economic productivity of our communities through connecting people to employment opportunities and prevent social isolation. Creating good transport links can also contribute to meeting Scotland's climate change targets through enabling people to access public transport and take advantage of active transport, including walking and cycling, for those that are able. Yet, despite these benefits, in our survey the majority of respondents felt that there was not enough focus given to active transport, community facilities and green spaces.

Recommendations: transport and infrastructure

Homes must be built with consideration to the wider infrastructure and transport facilities that will be required for the communities to thrive and grow.

Social landlords as 'community anchors'

CIH Scotland has previously written about how housing can help older people engage in communities and reduce loneliness and isolation²². Hanover Scotland's report *Connecting Communities*²³ documents several initiatives they have supported to reduce social isolation and loneliness for older people. These initiatives included arranging for a nursery and afterschool club to conduct activities with residents, creating group exercise challenges and arranging weekly coffee mornings with activities in partnership with local community projects. These initiatives helped increase people's health and wellbeing and integrate them more in their communities.

Social landlords also offer a wide range of non-statutory services to help people reach their full potential including:

²²<http://www.cih.org/resources/PDF/Scotland%20Policy%20Pdfs/Older%20People/Housing%20and%20Ageing%20January%202020%20FINAL.pdf>

[http://www.cih.org/publication-free/display/vpathDCR/templatedata/cih/publication-free/data/Scotland/CIH Scotland submission on loneliness and social isolation](http://www.cih.org/publication-free/display/vpathDCR/templatedata/cih/publication-free/data/Scotland/CIH%20Scotland%20submission%20on%20loneliness%20and%20social%20isolation)

²³ <https://www.housinglin.org.uk/assets/Resources/Housing/OtherOrganisation/Connecting-Communities-Housing-at-the-heart-of-integrated-health-and-social-care-in-Scotland.pdf>

- Training and employability services and job opportunities;
- Digital connectivity;
- Advice, information and income maximisation services; and
- Access to community spaces.

Unfortunately, when budgets are tight, non-statutory services can be the first to be cut, despite the added value they generate. Cuts to local authority budgets can have a particularly negative impact on community assets such as libraries, schools and sports facilities. While many housing associations do provide a variety of facilities and services set out above, these should not be seen as a replacement for services that were funded and provided through local authorities in the past. In order to thrive, communities need strong housing associations and local authorities.

Recommendations: social landlords as community anchors

More needs to be done to recognise the social return on investment generated by social landlords. A national review would help to make the case for continued investment in preventative spending.

Local authorities need long-term financial certainty to be able to provide essential facilities and services to support sustainable communities.

Digital connectivity and technology

The housing sector has made significant advances in recent years with technology being used to support tenants. Telecare services and equipment are now familiar but Blackwood Housing Association has taken digital care one step further with its Clever Coggs²⁴ system that allows tenants to keep in touch with friends and family or set reminders for appointments and medication. New 'Fit Homes' developed by Albyn Housing, Carbon Dynamic and the NHS which have been designed to be accessible and adaptable and incorporate a range of technologies tailored to tenants' needs²⁵. We need to continue to invest in this aspirational technology but at the same time, we cannot neglect the basics.

Approximately 13 percent of all households in Scotland do not have access to the internet from their home and this figure rises to 25 percent of social housing tenants²⁶. Access to the internet is a basic necessity, not least for everyday tasks such as shopping, banking and switching energy suppliers, but the UK Government has also made it more difficult to claim and manage benefits without easy access to the internet. All homes in Scotland should have the means to connect to the internet.

While technology is hugely beneficial, we need to ensure that new technologies are integrated safely and efficiently. In our Housing to 2040 workshops some participants noted that organisations can be risk averse for fear of "getting it wrong". Housing providers need expert help to deliver digital transformation projects both within their organisations and for their tenants. Other potential issues that were discussed included data protection and data sharing and the fact that technology should not be used to replace human contact.

²⁴ <https://www.blackwoodgroup.org.uk/clevercogs>

²⁵ <https://www.carbondynamic.com/fit-homes>

²⁶ <https://www.gov.scot/publications/scotlands-people-annual-report-results-2018-scottish-household-survey/>

Recommendations: digital connectivity and technology

Every home should have access to an internet connection. Delegates at our workshops suggested internet access being included in people's rent or council tax payments.

The Scottish Government should issue guidance on how to plan for and incorporate new technologies into our housing sector to ensure there are just transitions and no one is left out. This guidance should cover small devices up to larger interventions.

Better support for remote and rural areas

In our surveys, it was noted that to support rural communities and prevent depopulation, there needs to be better transport links and better links with economic development. Many people who live in rural Scotland are not within reasonable driving distance of key services (e.g. GPs). Additionally, there is less satisfaction with the quality of the public transport and more money spent on fuel for cars in rural areas compared to the rest of Scotland.

Rural Scotland also faces issues of housing supply and costs affordability which can be exacerbated by a high proportion of holiday lets, seasonal and low paid work. Housing stock in rural areas is also generally less energy efficient, and so there may be more challenges for rural properties to meet energy efficiency targets²⁷. It was also noted in our member workshops that it can be more expensive to develop homes in rural areas due to issues with accessing land and the cost of bringing in workers if there is no local workforce.

Recommendations: better support for remote and rural areas

The Scottish Government has committed to supporting and repopulating remote and rural areas of Scotland. If this is to be successful, there must be stronger links between housing, infrastructure and economic policies.

More affordable homes and a wider variety of housing options need to be developed to ensure people can stay in the local area if they need to move and to ensure remote and rural areas can attract more permanent residents as well as visitors.

Planning and implementing energy efficiency standards should take into account the difficulties rural and remote areas can face and try to mitigate these to ensure a just transition for rural residents.

Local authorities in rural areas should be supported to take on the role of facilitators in developing new affordable housing. This could include employing skilled staff such as architects and engineers who are familiar with the local area and can better support small developments or self-build projects.

²⁷ <https://www.gov.scot/publications/rural-scotland-key-facts-2018/>

6. Homes that meet people's needs

Housing is a human right

Housing is a human right. We welcome the Scottish Government's intention to embed human rights in Scottish law and will continue to call for housing to be a core part of any forthcoming legislation.

The right to a home does not simply mean having access to shelter. A person's home must meet their needs, enabling them to access all of the facilities inside and also allow them to access amenities and participate in the community outside their home.

While developing a paper on housing as a human right for Scottish Housing Day in 2019²⁸ and discussions contributing to this response, it is clear that the majority of our members and wider stakeholders agree that housing is a fundamental human right. However, there is some uncertainty around the practicalities of housing as a human right, particularly in relation to the 'cultural adequacy' of housing and what this actually means.

Recommendations: housing is a human right

Housing must be a core part of Scottish human rights legislation.

More work needs to be done to understand what housing as a human right means in practice and which bodies would be responsible for ensuring that rights are upheld.

The right homes in the right places

The 50,000 affordable homes target has been welcome and, while it is likely that the target will be met, reports have shown that we are not collecting enough data about what is being built and where to understand if we are building homes to meet a range of needs²⁹. Analysis carried out for the Homelessness and Rough Sleeping Action Group (HARSAG)³⁰ also suggests that the needs of homeless households are not being met, particularly with a lack of suitable one-bedroom accommodation against a backdrop of increasing numbers of single person households.

The draft vision states that older people should be able to move home if they want to. While many older people will wish to remain in their current home, many others may want to move but be prevented by a lack of suitable housing choice in the area they want to live. As part of the long-term vision for our housing sector, the Scottish Government should consider how to increase the variety of housing options available for all households.

While grant funding of up to £175,000 is available for self-build projects in urban and rural areas, it is only accessible when the applicant already owns land or has a contact in place to buy land³¹. Given that access to and cost of land is one of the significant barriers to self-build, the Scottish

²⁸ <https://www.scottishhousingnews.com/article/edinburgh-landlord-stripped-of-hmo-licence-but-maintains-airbnb-listing>
²⁹ https://scotland.shelter.org.uk/_data/assets/pdf_file/0005/1488560/Shelter_AffordableHousingReport_Feb18.pdf/_no_cache

³⁰ <https://social-bite.co.uk/wp-content/uploads/2018/06/RRTP-Analysis-and-Review-JUNE-2018-pubv1.pdf>

³¹ <https://www.mygov.scot/self-build-loan-fund/>

Government should consider ways in which it can better support self-build projects, not just for those who already have access to what may be a substantial asset in the form of land.

Recommendations: the right homes in the right places

Housing Need and Demand Assessments (HNDAs) need to be informed by robust data to make sure needs are identified.

People need a better variety of house types to meet different needs. The Scottish Government should make support for self-build projects more flexible so that it can be accessed more widely.

Making our homes more accessible

A report published in 2018³² estimates that at that point there was unmet housing need of over 17,000 homes for wheelchair users and estimated that would increase to over 31,000 homes by 2024. As set out in the draft vision document, our population is also growing older and therefore we are more likely to need more accessible homes in the future.

While building some specialist housing is necessary for people with particular needs, the majority of people will remain living in mainstream housing for as long as possible. It makes sense for all new housing to be built to better standards of accessibility.

Adaptations to existing homes can also make it easier for people to live well and independently in their home for longer, reducing the risk of trips and falls and unnecessary hospital admissions. While issues with the system for adaptations were highlighted by the Adaptations Working Group in 2012³³, the system is still complex with different routes and entitlement for people living in different tenures.

As stated previously, it is also important to consider accessibility outside. Our homes need to be well connected by public transport for those who can use it with private transport available for those who cannot.

The draft vision acknowledges that our ageing population will present challenges for the housing sector. As our population continues to age, the prevalence of dementia is expected to increase significantly. CIH Scotland has undertaken research into the role of housing in supporting people to live well with dementia with a practice guide published in 2017³⁴ and a new framework for housing and dementia published in partnership with Healthcare Improvement Scotland's Improvement Hub and Alzheimer Scotland in 2019³⁵.

Our work, and that of others, recommends that dementia friendly design should be incorporated into adaptations, cyclical maintenance and new build homes. While numerous design guides do exist, feedback from the housing sector has been that a national, overarching dementia friendly design guide would be extremely helpful. This would support social landlords with their approach to adaptations and maintenance but could also be used to influence new build design for social and private developments.

³² <https://www.horizonhousing.org/media/1522/still-minding-the-step-full-report.pdf>

³³ <https://www.gov.scot/publications/adapting-for-change-final-report-adaptations-working-group/>

³⁴ http://www.cih.org/resources/PDF/Scotland%20Policy%20Pdfs/Dementia/CIH_Dementia_pathways%20FINAL.pdf

³⁵ http://www.cih.org/resources/PDF/Scotland%20Policy%20Pdfs/Dementia/CIH_Dementia_pathways%20FINAL.pdf

Recommendations: making our homes more accessible

We should move towards accessibility by default, building all new homes to higher standards. Wheelchair users and people with other needs should be involved in developing new standards.

The process for applying for and funding adaptations needs to be simplified and more consistent across tenures and more funding needs to be made available. Relatively small investments can prevent a crisis and more costly hospital admission or move into residential care.

The Scottish Government should fund the development of national dementia friendly design guidance covering adaptations, maintenance and new build housing across sectors.

Supporting people to stay in their home

We have welcomed the Scottish Government's commitment to and investment in ending homelessness and supporting the expansion of Housing First. We also agree that homelessness should be prevented wherever possible and this should include investment in tenancy sustainment. Through our Make a Stand Campaign³⁶, CIH has been working to raise awareness of domestic abuse and the housing sector's role in tackling it. We have also developed guidance for social landlords in partnership with Women's Aid, ALACHO, SFHA and Shelter Scotland³⁷.

While progress is being made and the Scottish Government has established a working group to make recommendations to improve housing outcomes for women and children experiencing domestic abuse, we would like to highlight some of the challenges and solutions in this submission.

Under current processes, a victim of domestic abuse living with their abuser in the social rented sector usually has to make a homeless application as current legislation will not allow one member of a joint tenancy to be evicted. This can result in victims having to move away from family and friends, abandon possessions and deal with long waits for permanent accommodation. This can be disruptive and costly. When rehoused, a victim may not have the means to furnish their new home and have to rely on grant funding such as the Scottish Welfare Fund which is not guaranteed.

Furniture poverty is a much wider issue affecting many people moving home, not just victims of domestic abuse. Lack of basic furnishings can lead to tenancy breakdown and abandonment, void costs for the landlord and potentially leave the tenant homeless. The provision of furniture and white goods for all tenancies would constitute a significant expense for social landlords. However, we think it is right that all social tenancies should be furnished to a standard that allows people to live comfortably and with dignity. This is linked to the principles of housing as a human right.

Recommendations: supporting people to stay in their home

The Scottish Government should commit to reviewing tenancy law to allow social landlords to remove the perpetrator of abuse while allowing the victim to remain in their home if this is what they choose.

Scottish Government must support social landlords to end furniture poverty and ensure basic standards are provided for all social housing tenants.

³⁶ <http://www.cih.org/makeastand>

³⁷ <http://www.cih.org/resources/PDF/Scotland%20Policy%20Pdfs/Domestic%20abuse/Domestic%20abuse%20guidance%20for%20social%20landlords%20FINAL.pdf>