



Glasgow and West of Scotland
Forum of Housing Associations

Name:	Colleen Rowan
Organisation:	Glasgow & West of Scotland Forum of Housing Associations
Email address:	colleen.rowan@gwsf.org.uk
Phone number:	0141 271 2325
Would you like us to keep your response confidential:	No

The Glasgow and West of Scotland Forum of Housing Associations (GWSF) is the leading membership and campaigning body for local community-controlled housing associations and co-operatives (CCHAs) in the west of Scotland. The Forum represents 69 members who together own around 75,000 homes. As well as providing decent, affordable housing for nearly 75,000 households in west central Scotland CCHAs also deliver factoring services to around 20,000 owners in mixed tenure housing blocks. For almost forty years CCHAs have been at the vanguard of strategies which have helped to improve the environmental, social and economic well-being of their communities.

The Forum's key objectives are: to promote the values and achievements of the community-controlled housing movement; and to make the case for housing and regeneration policies that support our members' work in their communities.

We welcome the opportunity to contribute to the Commission on Housing and Wellbeing's consultation. Our response has been developed by members of the Forum and reflects their experiences of working alongside local people in their communities for the past four decades.

Please note that throughout our response we refer to various documents which are all available on the GWSF website and we have supplied the links to these in the further comments section at the end.

Section 1: Our assessment of the importance of housing for wellbeing in Scotland

Q.1. Has our assessment of housing and wellbeing missed any important benefits and, if so, which benefits and what is the evidence for this?

Firstly, we commend the Commission for examining the role of housing in a holistic manner, since only by considering the connections between housing and a wide range of other factors, can we hope to evaluate the relationship between housing and well-being. We also think that the Carnegie Trust's research which suggests eight types of well-being offers a robust frame-work for examining the benefits of 'good housing' on well-being. It is also

helpful to have the over-arching question “How might good housing contribute to this wider concept of well-being – to human flourishing?” set out at the beginning of the consultation document. (Section 1.5)

We agree that the eight types of well-being identified by the Commission are key influences on the relationship between housing and well-being. However, we would argue that under the ‘Health’ heading the potential impacts of housing on both physical and mental health as well as on an individual’s sense of well-being should be emphasised.

Additionally, we believe that Section 1.4 ‘What constitutes good quality housing?’ is too limited as it focuses solely on the physical aspects of good quality housing. In our opinion the section should be extended to incorporate other aspects of good housing which contribute to psychosocial benefits for individuals, such as security of tenure and the quality of the neighbourhood environment.

Q.2. Has our assessment exaggerated any of the benefits of housing for wellbeing and, if so, in what respects and what are your reasons for saying this?

We do not believe that the Commission has exaggerated the benefits of housing for well-being but as it notes in the consultation document ‘...it is difficult to disentangle the role of housing from the many other social and economic disadvantages...’ (Section 6.1.1.)

We passionately believe that good housing is one of the essential lynchpins for good health and well-being. However, we would emphasize that the health and well-being of individuals is influenced by a range of different factors including: individual health behaviours; genetic pre-disposition to certain diseases; local communities; and by structural factors such as economic and environmental conditions prevalent in the society in which they live, and which they often have little or no control over.

The impacts of the social determinants of health have been well-documented (Evans and Stoddart, 1990; Dalghren and Whitehead, 1991; Marmot and Wilkinson, 2006) and remain just as relevant today. Whilst the various health pathways - physical, social and psychosocial – often converge to influence individuals’ health and well-being at a neighbourhood level, good housing is only one piece of the ‘jigsaw’.

We therefore want to see Scottish Government policy which: firstly, makes the links between housing and other policy areas such as health; and secondly, which embraces ‘bottom-up’ approaches which draws upon the knowledge and experience of our members and other community anchor organisations, and crucially upon that of local people. (The list of documents on regeneration which are included at the end of our response provide more information on how we think this can be achieved).

Section 2: Does Scotland invest enough in housing?

Q.3. Do you agree with our assessment of the current position on investment in housing?

Overall, we agree with the Commission’s assessment and we welcome the fact Section 2.1 reiterates the message about the housing ‘haves’ and ‘have nots.’

In 2013 GWSF (along with other housing sector representatives) was a member of the Scottish Government’s Short Life Financial Capacity, Affordability and Development Subsidy

Working Group. The group was set up to collectively consider issues such as affordable rents, financial capacity and subsidy rates. Our views on all of these key issues are set out in detail in the Working Group's report to Scottish Ministers. We have included the link to the report in the final section.

Our comments on investment in existing stock are contained in our answers to Section 8 on the private rented sector.

Q.5. Do you agree with our suggestions for further action in the area of investment in housing?

We recognise that the Wheatley Group does provide a 'platform' for obtaining finance for new housing, but this applies to the housing associations that are under the Wheatley umbrella; in reality they are all members of the one housing group.

We are all for thinking about innovative ways forward but as autonomous, community-based and community controlled housing associations we value all the things about us that make us such strong community anchors. Indeed, it is *because* our members are community-based that they are able to respond so effectively to the regeneration needs within their neighbourhoods. This often means combining new build programmes with social regeneration initiatives.

We have set out the case for why our model works at the community level elsewhere in our response. Therefore we have serious reservations about endorsing an approach which appears to suggest that 'big is beautiful' and the only way to progress.

We would also emphasise that our members are not 'anti-aggregation' per se. For instance, our members often work together to share development costs.

Section 4: Getting a better fit between housing and welfare policy

Q.10. Do you agree with our assessment of the current position regarding housing and welfare benefits? What more would you add?

On the whole, we agree with the Commission's overall assessment of the current position regarding housing and welfare benefits. However, we would point out that Section 4.1 headed 'why do we think this is important' focuses solely on Housing Benefit. Although Housing Benefit costs and the implications of this on the housing sector are undoubtedly important we think that the impacts of the Westminster Government's welfare cuts, on already struggling households and families, are equally important and should have been included in this section.

The Commission notes that 'almost two-thirds of tenants in the social rented sector in Scotland receive Housing Benefit'. As social landlords who are based in some of the most disadvantaged neighbourhoods in Scotland, our members know that a great many of these tenants are vulnerable individuals. We would therefore take a very cautious approach to the suggestion that these 'resources should be used to fund additional housing rather than subsidies to individuals'. In our opinion, this could lead to even more poverty and hardship for this already vulnerable group.

Q.11. Do you agree with our assessment of the current situation of government policy at UK levels and the possible outcomes post-referendum? What more would you add?

With regard to UK Government policy on welfare reform GWSF set out members concerns in our 'Home Truths' document in June 2013 (link included in final section).

Our committee member led welfare reform group campaigned alongside other groups against the 'Bedroom Tax'. Whilst we welcome the Scottish Government's Discretionary Housing Payment mitigation funding we are acutely aware that the 'Bedroom Tax' itself remains on the statute books. We have recently written to the Minister for Housing and Welfare to seek assurance that the funding will remain in place for the next financial year.

As social landlords based in some of the most disadvantaged communities in the west of Scotland our members are particularly concerned about the impact that Universal Credit will potentially have on vulnerable people who already find it challenging to manage their financial affairs.

Two aspects of Universal Credit are of particular concern: firstly, that anyone wishing to apply for benefits in future or having to report a change of personal circumstances, will be expected to do this on-line as the new system will be "digital by default"; secondly that Universal Credit will be paid into a bank account by way of a Direct Payment.

Surveys of tenants carried out by GWSF members in 2013 indicated that:

- 25% of tenants do not have bank accounts
- 33% of households do not have internet access

In light of these facts, the advent of Universal Credit will therefore place an increased pressure on Housing Association staff to help tenants (and especially vulnerable tenants) to navigate the system and to manage their money.

Q.12. What are your views about the medium term policy options presented here? What other ideas and issues strike you over this time frame?

GWSF does not support the devolution of Housing Benefit on its own, separated out from the rest of the social security system. We think this would prove to be unworkable. Our reasons are outlined in our response to the Smith Commission (See link in final section).

Q.13. Do you agree that we have a unique opportunity to consider longer term policy options over the next key period in Scotland's history? How do you respond to the options proposed here? Are there other options that should be considered?

We remain open-minded on longer term policy options and we are willing to work with the rest of the housing sector, government at both local and national level, public bodies and the third sector to consider new ways of thinking and policy approaches as we move forward.

Section 6: Housing and Health and Education

Q.18. Do you agree with our on our assessment of the importance of housing to health and education?

Overall, we do agree with the Commission's assessment of the importance of housing to health and education. However, we would emphasise the caveats that we discussed in our response to Section 1 - Q.2.

Q.19. Do you agree with our brief assessment of current policy on housing and health and education?

We agree with the brief overview of current policy on housing and health and education.

Q.20. Do you agree with our suggestions for further action in the area of housing and health and education?

Although, we agree with the Commission's suggestions for further action we also have some additional recommendations to offer in relation to homelessness and older households.

Homelessness

We agree that a focus on prevention is the best way to tackle homelessness. The Housing Options model which has been piloted in Glasgow (by THE Wheatley Group and Queens Cross Housing Associations) has shown some positive results.

The service is available to every individual who makes a housing enquiry and aims to 'sustain housing status and prevent housing crisis.' Wraparound services are provided depending on the individual's needs and to be effective there needs to be real commitment to a multi-agency approach amongst the key partners. In Glasgow this includes various departments of Glasgow City Council including Social Work Services, the housing providers, and NHS GGC.

Older households

As far as we are concerned, a real commitment to shifting the balance of care away from acute services delivered in hospitals, to preventative services which enable older people to remain in their own homes and communities for as long as possible, is the ultimate aim.

It is an aim which underpins the key policies which the Commission highlights – Age, Home and Community and the Public Bodies (Scotland) Act, as well as the Reshaping Care for Older People policy. We strongly believe that the housing sector can play a key role in this agenda; indeed our members *already* provide a whole range of preventative services for older people and the 'low-level support' that promotes health, well-being and quality of life in the communities where people live. (JRF, Older People's Inquiry, 2006) We have carried out some research amongst members on the services they provide for older people and have included a link to this in the final section of our response.

Health and Social Care Integration

In our opinion, the biggest opportunity afforded by integration will be the chance for the housing sector to engage with, and influence, the scope and shape of integrated health and social care at the local level as the new integrated bodies are established.

Health and social care integration offers unique opportunities to put in place innovative and progressive approaches to ensure that home and neighbourhood take their central place in improving health and wellbeing, and that the housing sector plays its full part.

As we have stated above the housing sector already makes a real and tangible difference to people's health and well-being through a range of activities which enable them to stay at home and in their communities for as long as possible. However, it is vital that at the locality planning level all the key players in the integration process acknowledge that the housing sector is a key strategic partner and subsequently that it is 'given a seat at the table'.

Section 7: Housing and Community Regeneration

Q.22. Do you agree with our assessment of the importance of community regeneration?

We agree that community regeneration is of the utmost importance. For our members physical, social and economic regeneration in their communities are closely intertwined and they have been pioneers of this holistic approach to regeneration over the last 40 years.

We welcome the fact in Section 7.2 the Commission acknowledges this 'wider role' work. We would like to reiterate that Community Controlled Housing Associations (CCHAs) are based in local communities and are governed by local people who make decisions based on their knowledge and experience of what their local neighbourhood needs. We believe that these factors are key to the success of the CCHA model.

Well-rehearsed discourses over the last few decades have placed increased emphasis on the impacts of neighbourhoods and communities on a person's life chances. These impacts cover a range of spheres, including social, economic and health outcomes and embrace aspects of the *physical, social/cultural* and *service environments* within communities.

All of the above are closely interconnected and cannot be understood out-with the structural economic and social processes which sustain them. It is clear to us that regeneration activities which seek to tackle these issues must also be 'joined-up' in order to effect real, long-term change. We welcome the fact that the Scottish Government's regeneration strategy emphasises the importance of a holistic approach and its acknowledgement that these 'elements cannot be delivered in isolation'.

CCHAs' 'bottom-up' approach and the services and projects that they operate on the ground in their communities can help to meet or operate in tandem with bigger picture 'top-down' structural policy messages and initiatives. Strategies which encourage a two-way 'flow' between the two can only lead to improvements in the delivery of regeneration.

The myriad of projects, initiatives and services that our members deliver (either alone or in partnership) in their communities are examples of joined-up, holistic regeneration in practice. The sheer range of CCHAs' activities illustrates two key positive factors: firstly, CCHAs' commitment to improving their communities; secondly, their appetite for innovation.

We have already shared with the Commission two GWSF publications (More Than Bricks and Mortar and CCHAs – Still Transforming Local Communities) which document the range of our members' wider role activities. We have also included links to the publications in the final section of our response.

Q.23. Do you agree with our brief assessment of current policy on community regeneration?

In relation to current policy on regeneration we believe there are three different levels where policies and strategies operate. The first or 'top-level' is the Scottish Government where policies are formulated. The second is the 'inter-mediate' local authority level where Community Planning Partnerships sit; and the third is 'ground' level which incorporates community organisations and communities themselves. In our view, to create genuine collaboration and synergy between the three the over-arching policy vision needs to be clear and consistent and support needs to be given to shift the focus onto community-led regeneration.

This does not necessarily mean that the structures or framework need to be altered. It is more about effecting a culture change. This involves public bodies being prepared to adopt different and more flexible approaches and community organisations also thinking about new ways of working, and new partnerships. Essentially, our thinking on regeneration needs to be recalibrated in order to achieve better outcomes in the most disadvantaged communities.

As we have previously indicated GWSF welcomes a discussion about how housing associations can contribute more to local regeneration structures and processes, we believe that tensions exist between a 'community' and 'strategic' focus. The 'geography of decision making' is important here and many CPP areas are too large to be relevant to local people.

There has always been a serious mismatch between the scale of community planning and the scale at which community engagement is likely to be effective. In our view, there needs to be a recognition that it is not realistic for Community Planning Partnerships to have a neighbourhood focus and that effective community engagement only happens at the grass-roots level.

For further information we have included the link to our response to the latest Scottish Government consultation on the Community Empowerment Bill in the final section.

Q.24. Do you agree with our suggestions for further action in the area of community regeneration?

We strongly believe that *true* community empowerment can only be achieved as a result of action taking place at local level with local people leading, supported by trusted community anchor organisations. As the community controlled housing model demonstrates, when community empowerment happens in this way it leads to sustainable and enduring physical and social regeneration within communities. We have therefore highlighted in all of our responses to the various iterations of the Community Empowerment Bill the important role of community anchor organisations, and community controlled housing associations specifically.

However, we would like to reiterate here our concerns (as stated in our previous consultation responses) that the Bill does not develop thinking about how to support the role of CCHAs and other important community anchors (e.g. Community Development Trusts). We would like to see the Scottish Government more clearly setting out the key characteristics of

community anchors, and to use this as a platform for promoting innovative and collaborative approaches to public service planning and delivery in our most disadvantaged neighbourhoods. GWSF's working definition of a community anchor is an organisation that:

- Operates within a particular neighbourhood;
- Has the interests of the community in that neighbourhood at the core of its purpose and activities;
- Operates at a local level and is both trustworthy and stable;
- Has a governance structure based on control by local residents and accountability to them.

The potential savings to public sector budgets of the early prevention and intervention activities which community Controlled Housing Associations are involved in are huge. Our model is based on *real* community empowerment which has stood the test of time over the last 40 years.

The Scottish Government's Third Sector Directorate has recently provided funding for one year for a GWSF post of Regeneration Partnership Consultant. The aim of this post is to support CCHAs who wish to further develop their role as community anchors, improving on the social, economic and physical outcomes for their tenants and local areas. This type of formal acknowledgement and support will help to underpin our members' work in their communities as we move into the next 40 years.

Section 8: Do we need a more robust private rented sector?

Q.26. Do you agree with our views on the need for a more effective private rented sector which can make a greater contribution to meeting housing needs?

We would argue that, at the heart of the matter, there are bigger questions around what kind of housing system we want in Scotland across the social rented, owner-occupied and private rented sectors.

Policy over an extended period has resulted in us having a 'silo' type system. For example, social landlords have comprehensive statutory obligations to meet and are intensively regulated. By contrast, successive governments have adopted a largely laissez-faire approach to the rapid growth of private renting, created initially by the buy to let market and now sustained by the stagnation of the housing market after the credit crunch.

Scotland's poorest quality housing is found primarily in the private sector. The simple fact is that some neighbourhoods with older, poor quality PRS stock require significant investment in physical fabric, and even willing private landlords may not be able to make this investment without public funding support. There is little sense that this is seen as a significant priority for Government investment, as it was at previous times of crisis in older private rented housing stock in the 1970s and 1980s. Much stronger connections need to be made between investing to address poor housing quality, regulation and the future management of the housing stock.

As the Commission notes in Section 8.1, another issue which compounds the problems in the PRS is that it is composed of mostly small, individual landlords and therefore is extremely fragmented. This has created problems with regard to standards, so GWSF

welcomes any measures that seek to ameliorate this situation, for the benefits of tenants and communities.

CCHAs already play an important role in property factoring, maintaining neighbourhood quality where there are often absentee private landlords or landlords lacking property management expertise. We believe many CCHAs would be interested in exploring how their role as neighbourhood managers could be further developed, for example by becoming local letting agents for private landlords for the benefit of their local communities.

Our key message here is that the desire to promote further growth must be accompanied by effective action to improve physical quality and standards of management in *existing* PRS housing.

We would also strongly caution against seeing the expansion of the PRS as the only way forward. In the present economic climate, social landlords are not receiving the investment they need to build new housing. While the PRS will undoubtedly play an important part in providing housing solutions, we strongly believe it must not be promoted by government as being the only option and that housing policy must continue to give priority to meeting the needs of those who require genuinely affordable housing.

As the Commission notes in Section 8.1 there has been a shift in the demographic group who now live in the PRS and more families are now staying (and staying for longer) in the sector. We believe it is worth highlighting two important issues here. Firstly, poor quality PRS housing is often occupied by vulnerable households who have no other choices within the housing system. Secondly, as a wealth of recent research into 'Generation Rent' has shown many young people are 'stuck' in the PRS because they have no hope of getting on the property ladder. (See 'Mind the (Housing) Wealth Gap: Intergenerational Justice and Family Welfare research project).

We welcome the fact that the Commission encourages developing our thinking about a 'more robust private rented sector on the model of some European countries'. (Section 8.1) We believe however, that whilst the German private-rented model can be considered an exemplar it is far removed from the Scottish system and therefore it is difficult to envision how it might be transferred 'wholesale' to the Scottish context without a major cultural shift and associated shifts in taxation policy and in the motivation of many small Scottish private landlords who have entered the business in the expectation a revenue stream and continued growth in house prices.

In Germany renting has become the norm because of cultural precedents which are historically embedded in German society which support a strong regulatory framework, security of tenure, and long-term tenancies as standard.

Q.28. Do you agree with our suggestions for further action in the private rented sector?

In general we agree with the Commissions suggestions for further action in the private rented sector. We would also ask the Commission to consider our comments above.

Do you have any further comments in relation to the Commission on Housing and Wellbeing's consultation paper?

We have included links to a number of documents below. These expand on our response and we hope they are useful to the Commission in its consideration of written evidence to

the consultation. If the Commission wishes to follow up on any of the issues we have discussed we will be happy to provide further information.

Scottish Government - Local Government and Regeneration Committee
Delivery of Regeneration in Scotland Inquiry - GWSF Response to Call for Written Evidence
<http://www.gwsf.org.uk/assets/files/publications/GWSF%20Response%20Delivery%20of%20Regeneration%20in%20Scotland%20Inquiry%20.pdf>

Home Truths about Welfare Reform -The impact on our tenants and communities
<http://www.gwsf.org.uk/assets/files/Home%20Truths/Home%20Truths%20booklet.pdf>

GWSF Submission to Smith Commission
<http://www.gwsf.org.uk/assets/files/publications/Smith%20Commission%20final%2031%20Oct.pdf>

Reshaping Care for Older People – Briefing Note
<http://www.gwsf.org.uk/uploads/rcopconfmay12/delegatepack.pdf>

More Than Bricks and Mortar Report
<http://www.gwsf.org.uk/assets/files/publications/More%20than%20Bricks%20&%20Mortar.pdf>

CCHAs – Still Transforming Local Communities
<http://www.gwsf.org.uk/assets/files/Brochure%20final%204%20Nov.pdf>

GWSF Response – Community Empowerment Bill
<http://www.gwsf.org.uk/assets/files/GWSF%20CEB%20Response%20Jan%202014.pdf>

Report of the Financial Capacity, Affordability and Development Subsidy Working Group.
<http://www.gwsf.org.uk/assets/files/publications/Final%20Report%20of%20the%20Financial%20Capacity%20Working%20Group%20-%2026%20June%202013.pdf>