FEEDBACK TEMPLATE

The Chartered Institute of Housing is the independent voice for housing and the home of professional standards. 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. This response has been informed through discussion with our Board and our members. We also invited comments from our members via an online survey.

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General feedback

Housing is a human right. Ensuring that every person in Scotland is living in a good quality home that meets their needs and that they can afford should be the overarching ambition of the Scottish Government. This requires a dedicated new supply programme as well as investment in improving the condition of our existing homes and ensuring people have access to support when and where they need it.

Our diverse population has a wide range of housing needs and aspirations and so we must provide a range of options taking into account the needs of older people, people with mobility issues or other special needs, younger people, renters and those who want to buy a home.

Regardless of tenure or design, good quality homes need to be located in good quality communities, with access to amenities, green spaces and transport links.

Affordability is a central issue across the sector. While private rents are not rising uniformly across Scotland, clear affordability hotspots are emerging in cities such as Edinburgh and Local Housing Allowance (LHA) has not kept pace with rents in any area of Scotland. Home ownership remains out of reach for many but we know this is still where most people aspire to be.

It would be complacent to suggest that affordability is only an issue in the private sector. Social housing rents have been increasing to pay for new homes, maintenance and improvements and services for tenants. Additional pressures have been created by the UK Government's austerity agenda and welfare reform. While social housing remains by far the most affordable tenure, we must make sure that it remains so.

The social security system also has a vital role to play in ensuring that people who need support can afford to pay for their housing and other essentials and maintain a good quality of life. UK Government welfare reform measures have had a significant impact on housing providers and tenants. We welcome the Scottish Government's efforts to mitigate the worst of these impacts, but we must continue working to assess and highlight the impacts of policies which remain reserved to Westminster.

In recent years we have seen a growing body of evidence about the wider benefits of housing in supporting better health and wellbeing, education and employment opportunities and reducing inequalities¹. These benefits are tangible and can be built

¹ https://www.gov.scot/publications/health-homelessness-scotland/ http://housingandwellbeing.org/

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on over the next Parliamentary term, if there continues to be a substantial financial commitment from the Scottish Government.

Theme:	Accessible homes for disabled people
Ideas:	Key messages:
(Suggestions for the future vision, themes or interventions – start, stop or modify.)	We need more robust evidence to inform new housing development and ensure that accessible or specialist homes are available where they are needed. We must also ensure that people can access adaptations when they need them – funding and tenure should not be barriers.
	Still Minding the Step? published by Horizon Housing Association identified a shortfall of 17,200 wheelchair accessible homes and predicted a significant increase in demand in future years.
	A review of strategic housing investment plans commissioned by SFHA and Shelter Scotland showed that the current affordable housing supply programme is delivering a wide variation in the supply of specialist housing between local authority areas ranging from below 10% to over 20%.
	A review of accessible housing by the EHRC in May 2018 found that there is poor systems in place to understand demand for accessible housing and that only ¼ of local authorities set targets for accessible housing
	Currently the Scottish Government provide a "greener" housing subsidy, recognising the additional costs of building these homes. No such automatic subsidy exists for accessible housing.
	Further comments:
	 Supply of accessible or specialist housing: There is a need for more robust assessment of need for accessible and specialist housing. Specialist housing provision should take account the range of needs of people who are disabled, not just older people. This should include people with learning difficulties, younger disabled people and people with conditions such as dementia.
	 There is a need to consider the wider environment around the home. Accessible housing should also have easy

 $\underline{\text{https://scotland.shelter.org.uk/}} \underline{\text{data/assets/pdf_file/0009/1218609/Economic_impact_of_housing_investment.pd}} \underline{\text{f/}} \underline{\text{nocache}}$

 $\frac{\text{https://www.scotphn.net/wp-content/uploads/2015/11/2017 06 27-FINAL-SHIIAN-50-000-New-Homes-HIA-Report-ES.pdf}{}$

- access to local facilities and transport links to reduce social isolation.
- Homes should be flexible and adaptable to meet people's needs, they should be integrated with communities, not separate.
- The private rented sector has a role to play in delivering accessible homes for older and disabled people and private landlords should be encouraged and supported to provide accessible housing wherever possible.

Adaptations for mainstream housing:

- There are recognised issues with funding for adaptations within the social housing sector and access for private tenants and homeowners. While progress has been made following the Adapting for Change report, this issue needs further attention.
- The amount that the Scottish Government provide annually to fund adaptations by RSLs has, for some years, been static at around £10 million.
- With the transfer of council adaptations budgets to the integrated joint boards there is no longer any clarity on strategic leadership and the adaptations programme is run wholly separately from other adaptations processes.

Recommendations

- Consider the case for all new supply to be built to inclusive/universal design standards across all tenures.
- Introduce a national target for 10% of new homes to be to wheelchair user standard, which is monitored by councils and referenced in Local Housing Strategies
- Government establish financial incentives for construction of accessible/smart/lifetime homes. This will reduce the cost of residential and hospital care in the long-term.
- A review of Housing for Varying Needs, ensuring inclusive design and wheelchair-accessible design standards to apply across all tenure types.
- Greater parity for home owners and tenants requiring adaptation services

Concerns:

trends.)

(... about current or future policy, challenges,

Funding

- Lack of funding for adaptations or specialist housing can result in people reaching a crisis or perhaps having to move into residential care which could have been prevented
- Lack of funding in recent years has led to some cases of 'making do' rather than funding the adaptation that is actually needed. One member used the example of providing a commode rather than funding the installation of a downstairs toilet.

	 There is a need to balance investment in new mainstream supply (recognising that there is a shortfall) and specialist developments A similar comment pointed out the conflict between volume of supply (having to build flats to increase the supply) and the need for ground floor access or bungalows which would provide fewer units.
Questions: (about the process of developing the vision or route map or policy questions for SG to consider.)	What existing data do we have to inform housing needs assessments and where are the gaps?
	How will the views of disabled people be taken into account when developing a vision or policy for specialist housing?
	How do we ensure adequate funding is available to achieve long term visions?
	How are we reviewing the delivery of adaptations services provided by joint boards?

Theme:	Affordability and supply
Ideas:	Key messages:
(Suggestions for the future vision, themes or interventions – start, stop or modify.)	Our members have shown strong support for continuing to invest in affordable rented homes but have also called for mixed communities to cater to a range of needs.
	Sustained investment from the Scottish Government is required to maintain the supply of affordable housing and keep rents affordable.
	Social landlords are facing ever increasing financial pressures including: • Funding new supply programmes • Meeting EESSH and EESSH2 commitments • Meeting new fire safety standards • Dealing with increased rent arrears resulting from the roll out of Universal Credit • Dealing with the wider impacts of welfare reform including provision of additional support services for claimants These pressures need to be recognised within the context of continuing to deliver new affordable homes while keeping rents affordable. Further comments:

Investing in new affordable homes

- Subsidy levels need to be maintained at least at current levels, if not increased, to ensure rents remain affordable
- Investment in affordable housing should be linked with developing local economies so that we develop more skilled and better paid work
- There is a need to explore a range of affordable rented options beyond social and Mid Market Rent. The Scottish Government should consider the rent to buy model.
- Investment in new homes must be maintained but we need to make sure we are building the homes we need in the places we need them
- A new assessment of need (similar to the research carried out by ourselves, Shelter and SFHA in 2015) would help to inform the way forward after 2021
- We want long term financial commitment to affordable housing – social landlords need to be able to plan ahead and invest in skilled development workforce

Affordability in the private sector

- While private rents are not increasing in every area across Scotland, there are clear affordability issues in high demand markets such as Edinburgh.
- Local Authorities are finding it difficult to make use of Rent Pressure Zone powers due to a lack of data and the strict evidence requirements set out in the regulations.
- <u>CIH research</u> has shown that Local Housing Allowance (LHA) rates are not keeping pace with actual private rents creating affordability issues for low income households across Scotland.

Concerns:

(... about current or future policy, challenges, trends.)

Affordability

- Financial pressures on social landlords have resulted in rent increases in recent years and there is a risk that social rents could become unaffordable without adequate investment
- There is a lack of investment in rural communities leading to shortfalls in housing supply.

Funding for new homes

- There is a lack of consistency in the application of S75
 across different local authority areas. While there are
 measures within the Planning Bill which are intended to
 address this issue (powers to introduce an infrastructure
 levy) it is not yet clear how this will work in practice.
- Steps need to be taken to rebalance the housing sector and the way in which profits are made. Access to and the cost of

	land can be a significant barrier to delivering affordable homes. CIH Scotland has called for exploration of land value tax or land value capture models. Housing can fuel social divides
	 Attitudes to different housing tenures can lead to social divides, especially if the perception of 'success' remains linked to home ownership.
	 High private rents can make it difficult to save for a deposit, putting home ownership out of the reach of many while home owners continue to benefit from increasing equity.
	 We need to do more to help people understand the range of housing options that are available and dispel some myths.
Questions: (about the	How will the Scottish Government balance the need for short term and holiday lets (which are good for the economy) and student
process of	housing with the need for residential accommodation?
developing the vision or route map or policy questions for	How do we change the narrative around housing so that homeownership isn't always seen as the most attractive option?
SG to consider.)	Will there be modelling about cross tenure need and where to inform 2040 vision?

Theme:	Ageing population
Ideas:	Key messages:
(Suggestions for the future vision, themes or interventions – start, stop or modify.)	We need to develop a range of housing options for older people and ensure that they have the right information, advice and support to choose a home that will meet their current and future needs.
	People who live in social housing may have better access to advice and information about their housing options and help to move if they need to. However, 72% of people over the age of 60 are home owners (compared to 62% across the whole population) and 4% are private renters and it is vitally important that they are not overlooked.
	It is estimated that there are around 90,000 people living with dementia in Scotland and this number is expected to increase significantly as our population ages. CIH Scotland's dementia programme has set out the housing sector's role in supporting people to live well with dementia. Recommendations include: • Increasing awareness of dementia among housing practitioners • Better partnership working between housing, health and

social care and other partners

 Better awareness of dementia friendly design and how this can be incorporated into wider maintenance and commissioning plans

Further comments:

The right home

- Older people need a range of housing options including specialist and sheltered housing as well as mainstream housing.
- Downsizing might be the right options for some people and there should be more support and incentives available for this.
- Develop flexible homes that can be adapted as people's needs change.
- Older people should be more involved in shaping products and services do we really know what people want?
- Dementia friendly standards need to be incorporated into housing design and adaptations. There may be simple measures that can be included in new build homes or when routine work is being carried out. See <u>dementia friendly</u> <u>design guidance</u> for examples.
- As with comments in the section above, there needs to be robust data to support housing need and demand assessments in relation to specialist housing for older people.

Supporting people

- Technology should be mainstreamed, not just installed in specialist developments.
- Access to digital services and skills should be available to all residents in all homes.
- Support needs to be available to people across all tenures.

Concerns:

(... about current or future policy, challenges, trends.)

Funding for care and support

- The right type of housing can help older people to remain independent for longer but this needs to be underpinned by care and support services. It is not clear how we can continue to fund care and support services for a growing population of older people.
- Funding for technology which supports care and support is also important, as it can be complicated to clarify whether or not this can be paid for by Housing Benefit.
- There is still a need for better partnership working across housing, health and social care to maximise resources and provide the best services. Despite the introduction on Integration Joint Boards, more progress needs to be made

	on long term financial planning and strategic planning at local and national level.
Questions: (about the process of developing the vision or route map or policy questions for SG to consider.)	How can we fund ever increasing demand for care and support services? Do we have an accurate projection of future needs? How do we make sure older home owners and private renters access the advice, information and support they need to live independently for as long as possible? Is there a need to revisit the Scottish National Party manifesto commitment to develop 'Housing Health Checks'? Is a lack of suitable housing options keeping some older people in homes that are too big and becoming unmanageable? Would more older people decide to downsize if attractive options or more incentives were available?

Theme:	Brexit
Ideas:	Key messages:
(Suggestions for the future vision, themes or interventions – start, stop or modify.)	Uncertainty around the Brexit agreement or timescales for transition to any new arrangement make it difficult to predict what the impact might be on the housing sector.
	Feedback from our members suggests that the Scottish Government must be positive and proactive in moving forward regardless of the outcome of Brexit negotiations.
	Further comments:
	Positive outcomes could include: • Developing a more streamlined procurement framework • Supporting local economies and supply chains • Developing a local skilled workforce
Concerns: (about current or future policy, challenges, trends.)	 Costs of goods and services There's a possibility that the cost of imported materials could increase and impact new house building There could be staff shortages in certain industries including construction and care
	 Tenants and communities It is not clear whether residents from the EU will be able to stay in the UK in the long term or how Brexit might affect relationships within our communities It is not clear how rights to housing and support may change. Housing and advice staff will have to adapt to any new rules or restrictions.

	 If the price of food or other basic goods increases, low income households may struggle.
Questions:	How prepared is the Scottish Government to deal with a range of possible scenarios after March 2019?
process of developing the vision or route map or policy questions for	How do we ensure that people's rights to housing and other services are protected?
SG to consider.)	

Theme:	Child poverty
Ideas:	Key messages:
(Suggestions for the future vision, themes or interventions – start, stop or modify.)	We welcome the Scottish Government's ambitious targets to reduce child poverty and the housing sector has a vital role to play in ensuring access to good quality, affordable homes. Rents should remain affordable to tenants in low paid employment without recourse to benefits.
	Rent or mortgage payments are the biggest single outgoing for most households and so housing affordability is central to reducing child poverty (see our comments under the 'Affordability and Supply' section above)
	Further comments:
	 The role social landlords Many social landlords provide a range of services to support their tenants and reduce poverty including income maximisation advice; skills development and employment opportunities; energy efficiency measures and advice on reducing fuel bills; access to digital skills and connectivity.
	 Welfare reform The current social security system is not supporting a good quality of life for people Universal Credit has increased the risk of rent arrears and homelessness The reduced benefit cap has had a disproportionate effect on households with children and we have called on the UK Government to revise or ideally scrap the limit. CIH research has shown that as well as financial implications, the benefit cap has affected people's physical and mental wellbeing and reduced opportunities for children to socialise (where parents cannot afford to pay for activities, school trips or holidays).

	 Investing in opportunities More focus should be given to supporting parents to prepare for employment, increasing hours or developing skills for better paid work. Child care costs can be a significant barrier to work, especially for single parents Digital connectivity and skills for all households Recommendations Social landlords are given an increased subsidy to put downwards pressure on any proposed rent rises
Concerns:	process on any proposed form need
(about current or future policy, challenges, trends.)	 Lack of social housing supply means that not everyone can access it Local Housing Allowance is not keeping pace with the actual cost of renting. Barriers to private renting may increase pressure on social rented stock. A growing number of working households are living in poverty If financial pressures continue, social landlords may have to cut back on additional services that can help to reduce poverty Increasing expectation social landlords will raise rents Affordability is not measured by the regulator unless rents are considerd to be unaffordable
Questions:	Will the Scottish Government consider using its social security
(about the process of developing the vision or route map or policy questions for SG to consider.)	powers to consider new ways to support households with children? What is being done to tackle the longer term drivers of poverty – developing the economy and better paid jobs?

Theme:	Energy efficiency and climate change
Ideas:	Key Messages
(Suggestions for the future vision, themes or interventions – start, stop or	The Scottish Government needs to adopt ambitious targets underpinned by adequate resources if we are to improve the energy efficiency of all of our homes and tackle fuel poverty.
modify.)	CIH Scotland has recently welcomed proposals for minimum energy efficiency standards across all tenures and the introduction of a new statutory target for reducing fuel poverty. However we have also stated that more can and must be done before the 2040 target proposed by the Scottish Government.

Further comments:

- More investment should be made in developing energy efficient technologies and renewables. Social landlords are well placed to trial new technologies but need to be supported to do so and reassured that investments will count towards new targets such as EESSH2.
- A mixture of regulation, advice, information and incentives is required across all tenures to ensure every person is living in an energy efficient home that they can afford to heat.
- We should continue moving towards a set of shared standards across all tenures

Concerns:

(... about current or future policy, challenges, trends.)

Costs vs benefits

- The recent consultation on EESSH2 acknowledged that the vast majority of investment in meeting EESSH to date has been funded by landlords. It estimates the proposed EESSH2 standard to cost between £3.4 and £3.7 billion. There is a risk that without investment from the Scottish Government, this cost will be passed on to tenants through rent increases
- There are similar risks for private tenants and homeowners if the cost of energy efficiency installations outstrips savings on energy bills
- The Scottish Government must ensure sufficient investment to support improvements in energy efficiency

Enforcement

 Introducing minimum energy efficiency standards across all tenures is a positive step as long as they are accompanied by advice, information and appropriate financial support. However, it is not clear how standards will be monitored and enforced, especially in the owner occupied sector.

Missing the target

 The new statutory target to reduce fuel poverty will be missed without robust accountability and adequate funding

Questions:

(... about the process of developing the vision or route map or policy questions for SG to consider.)

How will the Scottish Government support innovation in energy efficiency? What is it doing to link with academics and industry?

How can we encourage people to value energy efficiency?

How can we encourage private landlords and homeowners to invest in improving the energy efficiency of their homes with minimal regulations and enforcement?

Theme:	Homelessness
Ideas:	Key messages:
(Suggestions for the future vision, themes or interventions – start, stop or modify.)	The Scottish Government has made significant progress in tackling homelessness in recent years, increasing access to assistance through the abolition of priority need in 2012 at the same time as reducing homelessness presentations through the Housing Options approach.
	However, recent statistics show that there is more work still to do. The 2017/18 statistics showed the first rise in homeless applications in 9 years (up to 34,972). The number of households in temporary accommodation has also remained over 10,000, including 6,615 children.
	CIH Scotland welcomed the renewed commitment to eradicate homelessness evident in the establishment of the Homelessness and Rough Sleeping Action Group (HARSAG).
	Research from Crisis UK and the Scottish Government clearly shows that homelessness has a financial cost as well as a human cost and that prevention of homelessness must be prioritised whenever possible.
	Recommendations
	Rapid rehousing and Housing First
	CIH Scotland has welcomed the commitment to develop rapid rehousing and housing first. However there are a number of challenges which need to be acknowledged so that they can be addressed. For this approach to be successful the housing sector needs:
	 An adequate supply of suitable, affordable homes to move people out of temporary accommodation more quickly; Guaranteed long term funding to be made available to cover support costs. While funding through third sector organisations such as Social Bite is very welcome, it may not be sustainable in the long term; Clarity on how to maintain choice and balance the needs of homeless households with others in housing need; Support from all partners including local authorities, RSLs, health and social care and the third sector; and Support for staff to adapt to new ways of working.
	Supply • We need to make the best use of housing stock including
	empty homes • See comments in section on 'Supply and Affordability' above

Flexibility

- We should consider greater flexibility for people to move between local authority areas when this would be suitable.
- We need to be more realistic with people about their housing options and exploring the range of options available. The new Private Residential Tenancy should help to provide more secure accommodation within the PRS

Domestic abuse

- Around 28% of women who present as homeless give their main reason as a violent or abusive relationship breakdown.
- The report <u>Change</u>, <u>Justice</u>, <u>Fairness</u> highlighted practice by Fife Council that predominantly moved the victim of domestic violence form their home, often resulting in stress and financial disadvantage – there is a need to ensure that the victim is supported to stay in their home if they want to and it is safe to do so which is in line with the HARSAG recommendations
- When a victim of domestic abuse does need to move home, support must be put in place for them to do so through a planned management transfer. This might include financial support, help with moving or acquiring furniture and appliances. Where possible victims should not be forced down a homelessness route and/or into temporary accommodation

Concerns:

(... about current or future policy, challenges, trends.)

External risks

- Welfare reform measures, Universal Credit in particular, are increasing people's risk of arrears and homelessness.
- Risk of private landlords refusing to rent homes to people in receipt of benefits

Maintaining mixed communities

 The allocation of social housing needs to support mixed communities. In implementing rapid rehousing and housing first, we need to make sure we maintain a balance between homeless households and others on the waiting list. We must also ensure that homelessness does not become the only or easiest route to social housing.

Questions:

(... about the process of developing the vision or route map or policy questions for SG to consider.)

Will the Scottish Government consider embedding homelessness and housing into the school curriculum? This will help young people to understand the issue of homelessness and also have an awareness of their own housing situation and options in the future.

How can the Scottish Housing Regulator support better performance in tenancy sustainment?

What research has been undertaken to predict homelessness trends beyond 2021?

Will homeless be recognised as a gendered issue, with women and men's homeless having distinct causes and solutions?

Theme:	Place, quality and standards
Ideas:	Key messages:
(Suggestions for the future vision, themes or interventions – start, stop or modify.)	Our homes and surrounding places need to be designed to a high standard, meeting current needs and taking future needs into account.
	There is a need for communities to feel more connected to the planning process (as recognised through the recent Planning Review) so that they can help shape the future of the places they will be living, working and socialising in. Engagement with communities early on in the process and ensuring adequate infrastructure provision can also help to prevent objections to development. New homes should be seen as a benefit to the local community and not a strain on existing resources
	Currently, many social housing properties are let with no floor coverings, window coverings, white goods or furniture, and without being decorated.
	A study by Pawson et al (2006) in Glasgow found that not having adequate furniture was a reason for tenancy failure. The tenancy termination rate in unfurnished tenancies was more than double the rate in furnished tenancies (25% versus 10% in 2003).
	 New home standards Building standards should allow enough space and flexibility for homes to be adapted in the future if required More should be done to encourage the development of brownfield land as well as vacant and derelict land within our existing communities Consideration should be given to how we can support and encourage different types of building e.g. self build and cohousing developments can help to foster a sense of community and reduce loneliness and social isolation The standard of social rented homes at the point of let needs to be reviewed. Greater consideration must be given to the impact of furniture poverty, the scale of the problem and the measures needed to address this.

	 Local amenities Communities need green spaces, good quality streetscaping and landscaping. Public transport links – especially in rural areas Connectivity needs to be considered and access to free wifi should be much more widely available
Concerns: (about current or future policy, challenges, trends.)	 There needs to be a balance between good quality standards and costs There is a need to explore new technologies and building methods – but this cannot compromise on quality Social landlords can struggle to compete with large developers for land. Issues with the provision and cost of infrastructure have been raised through the Planning Review. While the Planning Bill does make provision for the introduction of an Infrastructure Levy it is not clear how this will work in practice.
Questions: (about the process of developing the vision or route map or policy questions for SG to consider.)	What innovative funding streams are being considered or developed by the Scottish Government to support infrastructure? Do we need a review of housing standards across tenures to ensure compliance with the minimum human rights international standards? Is the Scottish Welfare Fund adequate to support people who need basic furnishings and appliances? Is a discretionary and limited fund the best way to support people moving into a new home?

Theme:	Regeneration and sustainable communities
Ideas:	Key messages:
(Suggestions for the future vision, themes or interventions – start, stop or	While we think that the Scottish Government must maintain existing levels of investment in new affordable housing, it is clear that we must not neglect our existing homes and communities.
modify.)	Local communities must be closely involved in plans for regeneration to ensure that new developments meet their needs and aspirations as well as those of people who might be moving

into the area.

Where new homes are being developed, sustainable communities should include a mix of tenures but ensuring that truly affordable homes remain part of that mix.

However, as well as new supply, we would also like the Scottish Government to recognise the need for stock replacement. Certain areas do not necessarily need more social housing units per se but they need more social housing that people want to live in. In some cases where social housing is no longer suitable, for example in poorly located high rises, the only way to address this is through demolition. The current funding model which focuses on absolute new supply fails to recognise this.

Further comments:

Engaging with local communities

- Engagement should be meaningful and take concerns of local residents into account
- Communication is key. Local communities need feedback so they can see where their views have been taken on board or the reasons why a different decision has been made
- Greater use of methods such as participatory budgeting can help people feel connected with decision making
- Support communities to develop their skills and get involved in leading local projects

Designing new spaces

 Community spaces need to be designed in to regeneration projects creating places for people to meet and socialise, promote wellbeing and reduce isolation and loneliness.
 These could include green spaces and parks, allotments or community hubs

Concerns:

(... about current or future policy, challenges, trends.) Balancing costs with the needs of local residents

- While a commercial aspect (such as homes for market sale) can help to fund wider regeneration work, this must not be at the expense of affordable housing.
- Similarly, the need to achieve a financial return should be balanced with design and density, delivering a mix of housing types, not just flats.
- Need to take account of long term maintenance requirements and where funding will come from in future
- Risk of gentrification

Questions:

How can we strike the right balance between financial and social

(about the	value in regeneration projects?
process of	
developing the	
vision or route	
map or policy	
questions for	
SG to consider.)	

Thomas	
Theme:	Welfare, wealth inequality and intergenerational
	inequity
Ideas:	Key messages:
(Suggestions for the future vision, themes or interventions – start, stop or modify.)	The Scottish Government must continue to mitigate welfare reform measures wherever possible. As funding for mitigation work is finite, we must be sure that it is being used fairly and having the greatest possible impact.
	While the Scottish Government's approach to social security and its focus on dignity and respect is very positive, powers remain limited. We must continue to gather and highlight evidence on the impact of reserved welfare areas.
	Continuing welfare reform and the roll out of Universal Credit poses significant challenges for the housing sector. Research submitted to the Scottish Parliament in 2015 estimated that the cumulative impact of welfare reform measures would remove £1.5 billion from Scottish claimants each year. That is £1.5 billion less for our residents to spend on rent and other essentials.
	While our members support the principles of supporting people back into work, evidence suggests that the current regime of welfare conditionality and sanctions does not necessarily improve job prospects and is having a significant and detrimental impact on some claimants.
	Despite the recent announcement that work allowances for Universal Credit claimants would be increased, this will not ensure that 'work pays' for everyone in line with the central policy aim of UC.
	Further comments:
	Building intergenerational links Schools should be encouraged to link with housing providers, especially those with accommodation for older people Different housing models such as multi-generation cohousing can build networks in communities with older and younger residents benefiting from support and reduced

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	social isolation
Concerns: (about current or future policy, challenges, trends.)	UK Government austerity and welfare reform risks increasing inequality
Questions: (about the process of developing the vision or route map or policy questions for SG to consider.)	How can the Scottish Government design a social security system that provides enough support to enable people to have a good quality of life without disincentivising work?

ENDS