

GCPH response to Glasgow’s Draft Local Housing Strategy 2023-28 (April 2023)



Note: questions/sections for which GCPH did not provide an answer have been removed, resulting in sections having different numbers than in the original response. Question numbers remain unchanged.

1. About the strategy

Before starting this questionnaire:

Q1: Did you read the Draft Local Housing Strategy?

- Yes

Q2. To what extent do you agree or disagree with the following statements about the Strategy?

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know / no opinion
It was easy to read	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It was easy to follow	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It was comprehensive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

2. Vision

Glasgow’s Draft Local Housing Strategy 2023-28 sets out a vision:

“Everyone in Glasgow will have access to an affordable, suitable, climate friendly home, which promotes good health and wellbeing and connects to communities and the opportunities the city offers”

Q3. Is the vision clear?

- Yes

Q4. To what extent do you agree or disagree with the vision?

- Tend to agree

Please share any comments on the vision

Introduction to our response:

The Glasgow Centre for Population Health (GCPH) welcomes the opportunity to provide comments on the draft housing strategy 2023-28. Before providing a detailed response, we would like to highlight some of the wider public health challenges currently facing the city. A new GCPH joint paper looking at the impact of austerity policies on changing death rates in the UK found that there were around 335,000 more deaths between 2012 and 2019 with evidence that among the more deprived populations, female death rates had worsened to a greater degree¹. Other recent research shows that even before the pandemic, healthy life

¹ Walsh D, Dundas R, McCartney G, et al. J Epidemiol Community Health 2022;76:1027–1033.

expectancy (a measure of the number of years lived in good health) in Scotland was lower than it had been in 2008. In 2019, for those living in the most deprived areas it was 46.6 years compared with 70.3 years in the least deprived areas. A gap in health life expectancy of 23.7 years². These deeply concerning changes were largely attributed to austerity policy measures.

Housing has a vital public health role to play in addressing such stark health inequalities. Increasing the supply of affordable housing is key to addressing housing needs and tackling child poverty. Tackling fuel poverty among low-income households can help reduce higher death rates and ill health linked to living in cold and damp homes. Money worries, a lack of space and relationship problems are all connected to housing insecurity and poorer mental health. Adopting inclusive approaches for all citizens will remain vital, as we know that people experiencing homelessness have catastrophically poor health outcomes³.

It is encouraging that the draft strategy recognises the roles that housing and other partners can play to reduce inequalities and tackle poverty. However, with over 3,800 staff employed in social housing and Glasgow city's Health and Social Care partnership (HSCP) employing just under 11,000 staff, there could be further opportunities for both sectors to work more closely to maximise the potential housing has for promoting health and wellbeing. Throughout our response, we have provided some examples of how this type of partnership work could be strengthened.

Before moving on to provide more in-depth comments, there are some areas within the plan where we think more detail was needed on how the priorities could be achieved in relation to energy efficiency within the Private Rented Sector, some place-based aspects of meeting housing targets, and student accommodation.

There may be a need to provide more detail on how achieving energy efficiency across the Private Rented Sector (PRS) does not lead to unintended consequences. In other words, the future costs of upgrading homes within the PRS being passed over to tenants, or landlords not being willing or able to burden the costs. We have some concerns that this could potentially result in a reduction in the overall number of PRS tenancies in Glasgow city.

In relation to the proposed housing supply targets, we also have concerns that any pressures to meet these targets could lead to some place-based aspects being overlooked. For example, how does the strategy ensure that new residential developments have local access to quality amenities (e.g., shops, public services, greenspace), job/training opportunities, and public transport, which avoids creating a car dependency culture. Ensuring that new housing developments give more priority to these place-based aspects is crucial for not only creating healthier neighbourhoods but ensuring that Glasgow becomes more resilient in areas such as climate change through declining emissions linked to a reduction in car use.

We recognise that there is currently insufficient accommodation for students in Glasgow, and surrounding areas, with some higher education establishments having to turn students

² Walsh D, McCartney G. Changing mortality rates in Scotland and the UK: an updated summary. GCPH: Glasgow; 2023

³ Public Health Scotland (2021) Healthy housing for Scotland A briefing paper setting out the fundamental link between housing and public health. Available at: [Healthy housing for Scotland \(publichealthscotland.scot\)](https://publichealthscotland.scot/healthy-housing-for-scotland/)

away. However, we are concerned that attempting to meet the student accommodation demands might lead to concentrated neighbourhoods that are not integrated with the larger community.

Lastly, we believe that delivering more affordable social housing needs to be the main priority. This aim cannot be achieved in isolation of some of the common threads covered in our response. They include tackling the 'hidden' deductions from families Universal Credit payments, strengthening continuing efforts to tackle fuel poverty and improve uptake of unclaimed benefits among low-income households, and ensuring that new digital approaches among housing providers does not further increase inequalities among digitally excluded citizens.

The main body of our response will primarily focus on providing detailed comments on priorities 1, 2, 4 and 5.

3. LHS Priorities

Glasgow's Draft Local Housing Strategy 2023-28 sets out five Priorities. We want to find out how these matter to you. Please tell us how important these are to you.

Q5. How important or otherwise, would you say each of the LHS Priorities are to you?

	Very important	Fairly important	Not very important	Not at all important	Don't know / No opinion
LHS Priority 1: Delivering more homes and great places that reduce poverty and inequality and increase opportunity and prosperity for all	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
LHS Priority 2: Improving the energy efficiency of Glasgow's homes, reducing fuel poverty and supporting a Just Transition to Net Zero through decarbonising domestic heating and energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
LHS Priority 3: Improving the condition of Glasgow's homes and preserving Glasgow's tenements and built heritage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
LHS Priority 4: Supporting people to live independently and well at home in the community	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
LHS Priority 5: Improving housing options, affordability and sustainability for tenants and owners, to prevent and reduce homelessness	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q6. Please share your views on the LHS Priorities.

LHS Priority 1

The GCPH welcomes the priority to reduce poverty and inequality and increase opportunity

and prosperity. We also recognise that efforts to achieve the priority are occurring within a very challenging landscape that continues to be shaped by austerity measures, the lingering aftermath of COVID-19, and the cost-of-living crisis.

Although only half-way through a two-year cost-of-living crisis, a report from the Resolution Foundation paints a concerning outlook for UK households' living standards. The proportion of adults unable to replace electrical goods when needed has dramatically increased to twelve million. Fourteen million were unable to afford to switch the heating on, and six million were going hungry, as they lacked enough money to buy food. Outcomes were much worse for larger families with children in receipt of Universal Credit, who received the same flat rate Cost of Living Payments as single people claiming the benefit, despite having different household needs⁴.

Universal Credit

The GCPH recognises that social security systems have a vital role to play in determining household and population health. Therefore, with Universal Credit (UC) a central welfare benefit containing a housing element, the comments in the main body of this section will look at UC within the context of LHS priority 1. We will comment on the scale of UC uptake, including housing entitlement, look at some of the challenges around sanctions and deductions, before commenting on child poverty rates and other potential responses to support the priority.

Universal Credit and the housing element

Department of Work and Pensions data shows that by November 2022, just over 65,000 households in Glasgow City claimed UC, with two-thirds (>43,000) receiving a housing entitlement. This proportion varied by family type, as shown in the table below.

Table 1: Households claiming Universal Credit and the housing element, by family type: Glasgow City November 2022

	Households claiming Universal Credit	Housing entitlement	% of UC households with housing entitlement
Single, no children	37,755	22,145	59
Single, with children	18,326	14,417	79
Couple, no children	2,393	1,732	72
Couple, with children	6,555	4,854	74
Unknown or missing family type	24	14	58
TOTAL	65,057	43,168	66

Source: DWP, Households on Universal Credit

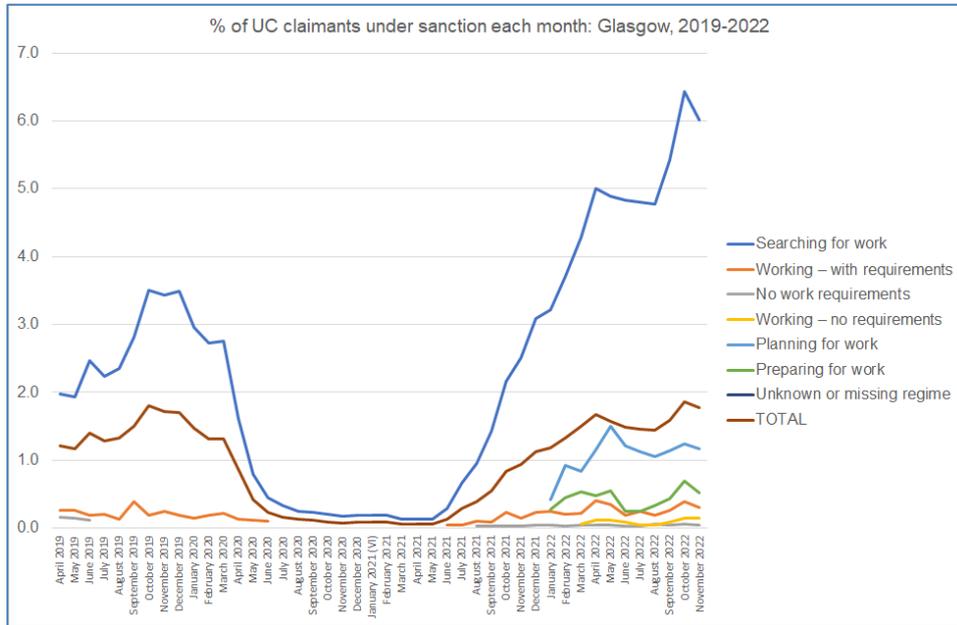
Universal Credit: sanctions and deductions

Universal Credit data shows that 1,307 claimants in Glasgow (1.8%) were under sanction in

⁴ Resolution Foundation/Health Foundation (2023) [The Living Standards Outlook 2023](#)

November 2022. Almost all the sanctions (1,201, 92%) were applied to claimants in the “seeking work” category, where 6% of claimants seeking work were under sanction, doubling since pre-pandemic levels (see Figure 1).

Figure 1: Percentage of Universal Credit claimants under sanctions each month: Glasgow 2019–2022)



Source: DWP, Universal Credit Sanction rates

There is evidence that conditionality in the form of benefit sanctions is not effective in assisting entry into paid work overtime.⁵ These types of sanctions are having a significant impact on household income. A UK parliamentary question from a Glasgow MP showed that between June and August 2022, UC sanctions in Glasgow amounted to £937,000, leaving already struggling households losing on average £250 each month⁶. Alongside sanctions, there is growing concern about the impact of deductions.

Universal Credit deductions can be taken by the Department of Work and Pensions (e.g., UC advance payments, overpayments, sanctions, hardship payments) and from third parties (e.g., housing costs, rent arrears, loan & fines, mains fuel cost, gas & electricity).

For UC claims receiving a payment during August 2020, 41% (1.85 million) had a deduction (excluding sanctions and fraud penalties)⁷. There are various reasons for deductions but the most common is advance repayments. This occurs when a new claimant requests an advance on their payment because they cannot get by without support during the five-week wait for their first UC payment. The advance is then repaid by deducting a sum from UC payments over the next twelve months. More recently, Citizens Advice Scotland estimated

⁵ Taulbut M, Mackay DF, McCartney G. Job Seeker’s Allowance (JSA) benefit sanctions and labour market outcomes in Britain, 2001–2014. Cambridge J Econ 2018; 42: 1417–1434. <https://doi.org/10.1093/cje/bex088>

⁶ [Written questions and answers - Written questions, answers and statements - UK Parliament](#)

⁷ [Universal Credit: 12 Nov 2020: Hansard Written Answers - TheyWorkForYou](#)

that 188,300 households in Scotland were liable for deductions, with many requesting an advance payment⁸.

A study on behalf of Aberlour childcare found that more than half of UC households with children in Scotland had at least one deduction from their monthly income to cover debts to public bodies, rising to more than a quarter facing multiple deductions⁹. Further breakdown at a local authority level showed that families in Glasgow faced monthly deductions between 9 and 11%, equivalent to £70-90 losses per month.

Since the onset of the pandemic, the volume of all types of deductions (including third-party deductions) taken from families in Glasgow increased (see Figure 2). This was partly due to the increase in numbers eligible for UC as a result of the pandemic. This suggests increasing levels of need existed in the city before the current cost-of-living crisis.

Figure 2: Volume of UC households with children and types of deduction: Glasgow city (April 2019 – November 2021)

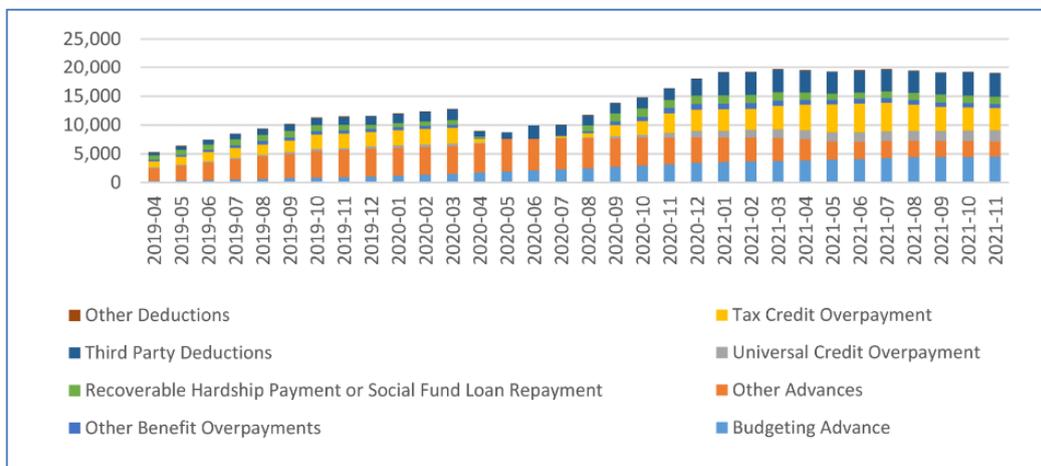


Figure 3 shows the volume of households in Glasgow with at least one third-party monthly deduction and average amounts: rising to around 4000 households towards the end of 2021.

⁸ Scottish Housing News (2023) An estimated 188,300 households in Scotland were liable for deductions with many taking an upfront payment before receiving their first Universal Credit claim.

⁹ Aberlour Childcare (2022) Universal Credit Deductions for Households with Children Report Briefing.

Figure 3: Volume of UC households with children with at least one third-party deduction and average amount of deductions: Glasgow city (April 2019 – November 2021)

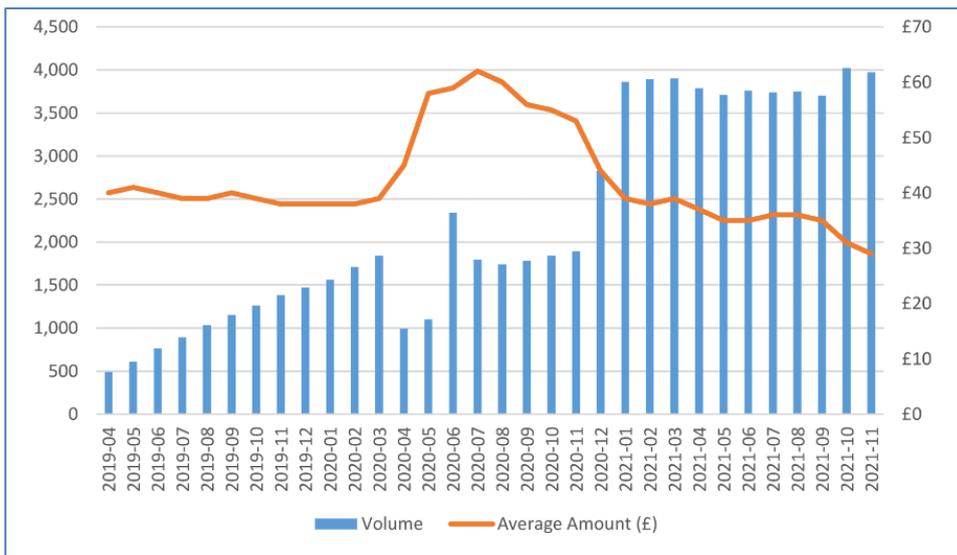
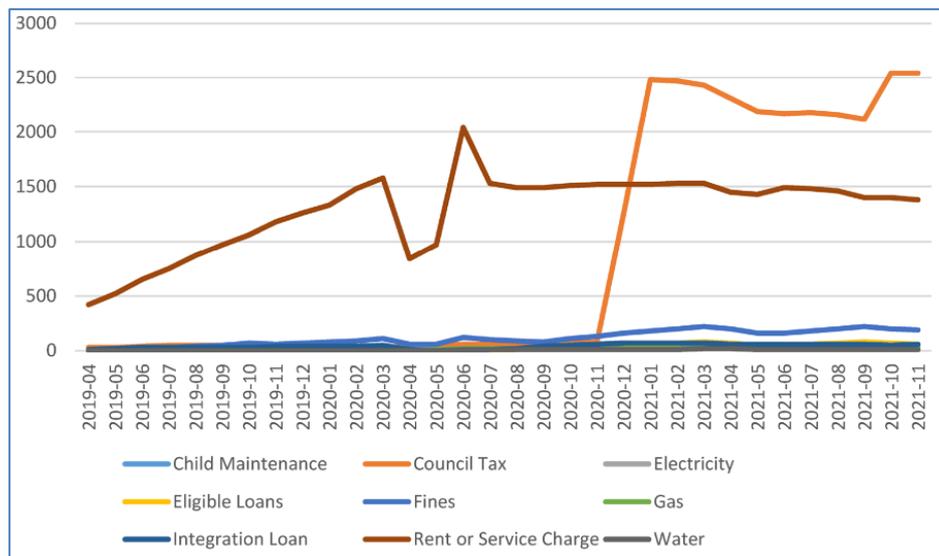


Figure 4 shows further breakdown of all the types of third-party deductions. Both rent and council tax arrears were the most prominent and staying high.

Figure 4: Volume and type of third-party deduction. Glasgow city (April 2019 – November 2021)



The standard allowance is the basic building block of support for all households receiving UC. It is intended to help with the living costs of the adults in a household, but it is not set according to any calculation of these costs. Its real term value has been allowed to erode over time and 2022/23 has seen it reach its lowest level in nearly 40 years. It has been argued that existing UC payments would need to increase by £35 to around £120 a week for a single person and at least £66 to around £200 a week for a couple to meet basic household needs¹⁰.

¹⁰ Joseph Rowntree Foundation and The Trussell Trust (2023) Essentials Guarantee: Reforming Universal Credit to ensure we can all afford the essentials in hard times.

Relative child poverty rates

The latest Scottish Government data shows that between 2019 and 2022, after housing costs, an estimated 21% of Scotland's adult population (1,110,000) were living in relative poverty, and 24% of all children (250,000)¹¹. Comparable local authority data is not yet available, however past trends indicate that both adult and child poverty rates in Glasgow are likely to be above national rates.

Although relative child poverty rates are expected to drop considerably between 2022 and 2024 due to the threshold measure falling considerably as typical income falls, this does not mean that families' actual circumstances will improve. Moreover, the two-child limit benefit cap and frozen Local Housing Allowance rates are expected to drag down income growth at the bottom of the distribution, and relative child poverty across the UK is predicted to reach its highest rate since 1998-99 by 2027-28. The rise is expected to be driven entirely by large families, increasing to 55% for those with three or more children and 77% in families with four or more children.

A consistent theme in the Resolution Foundation report on UK living standards is how outcomes are considerably worse for large families with three or more children¹². Food insecurity among large families tripled from 16% to 56% this winter. Larger families are also more likely to be worried about their energy bills, with 63% worried about winter heating bills compared with 42% without children. As noted at the outset, the Cost-of-Living Payments made to households on UC is a flat rate, regardless of whether recipients are a single person or a family of five.

To conclude, we welcome the draft housing strategy recognising the need to prioritise increasing the supply of affordable housing options to meet the needs of larger families (see priority 4 comments). We also endorse the recent call from a coalition of children's charities, anti-poverty organisations and campaigners asking both the Scottish and UK governments to pause debt recovery for money owed to public bodies across the UK by people on the lowest incomes¹³. The following quotes illustrate the real human impacts of not providing this breathing space:

"I don't like owing anybody, I don't like having debt ... When I got that letter saying we owed £700 ... I was nearly floored, I was like ... why do we owe this? What do we owe it for? ... And it was horrible, knowing that you owed something that you knew nothing about." (Female, single-earner couple, two children)

"I was also hit with a civil penalty for fifty quid. I don't know what the civil penalty was for, nobody's told me." (Female, single-earner couple, two children)¹⁴.

Finally, if families continue to face monthly deductions between 9 and 11%, this could effectively wipe out any meaningful gain from the planned 10.1 per cent increase in UC payments starting on 1 April 2023. Moreover, with two-thirds of claimants in the city receiving housing entitlement and the highest rate found among single adults with

¹¹ <https://data.gov.scot/poverty/#working-age-adults>

¹² Resolution Foundation/Health Foundation (2023) *The Living Standards Outlook 2023*

¹³ *Pause on Debt Recovery ahead of UK Budget called for by Anti-Poverty Coalition*

¹⁴ Griffiths, R. & Cain, R. (2022) *Universal Credit, deductions and 'sexually transmitted' debt*, *Journal of Social Welfare and Family Law*, 44:4, 431-454

children, it is vital that stronger links are developed between key partners taking forward the housing strategy and Department of Work and Pension agencies to address these identified challenges.

LHS Priority 2

The GCPH welcomes the priority given to improving energy efficiency, supporting the transition to net zero and reducing fuel poverty. In responding to this, we will mainly focus our response on the priority to reduce overall fuel poverty in Glasgow, which is important for tackling health inequalities.

NHS leaders have expressed concern that rising levels of fuel poverty could be a public health emergency, causing and exacerbating physical and mental illness across the whole population, and straining already stretched health and care services¹⁵. Moreover, the public health consequences of fuel poverty and cold homes have been well documented¹⁶. Cold, damp homes increase the risk of cardio-respiratory disease and poor mental health in adults. Fuel poverty and cold homes can also contribute to excess winter deaths. Those at higher risk include people with disabilities, who are more likely to be house-bound and less able to move around; people in low-quality housing with low thermal efficiency; and people with prepayment meters at greater risk of disconnection if they do not have the immediate resources to 'top-up' their meter.

Child development and education are also adversely affected by lost schooling due to increased respiratory disease and difficulties studying if the family is crowded into a single heated space. A study involving 28 European states found that 1.7 million school days were missed in 2017 due to diseases associated with dampness and mould in residential buildings. On average, there were about 2.5 missed school days per sick child per year because of illnesses that frequently correlate with an unhealthy indoor climate alone in residential buildings¹⁷.

Between October 2022 and March 2023, UK households using prepayment meters (PPM) were entitled to six monthly instalments worth up to £400 to help with winter energy costs. Around 1.9 million households have not redeemed their PPM vouchers, according to the latest UK government data¹⁸. A breakdown of local authority uptake reveals that Glasgow had one of the lowest redemption rates. By the end of January 2023, 191,350 vouchers were issued with 123,760 (64.7%) redeemed. Uptake across the city varied from 56.9% in Glasgow Central to 67.3% in Glasgow North East (see Figure 5).

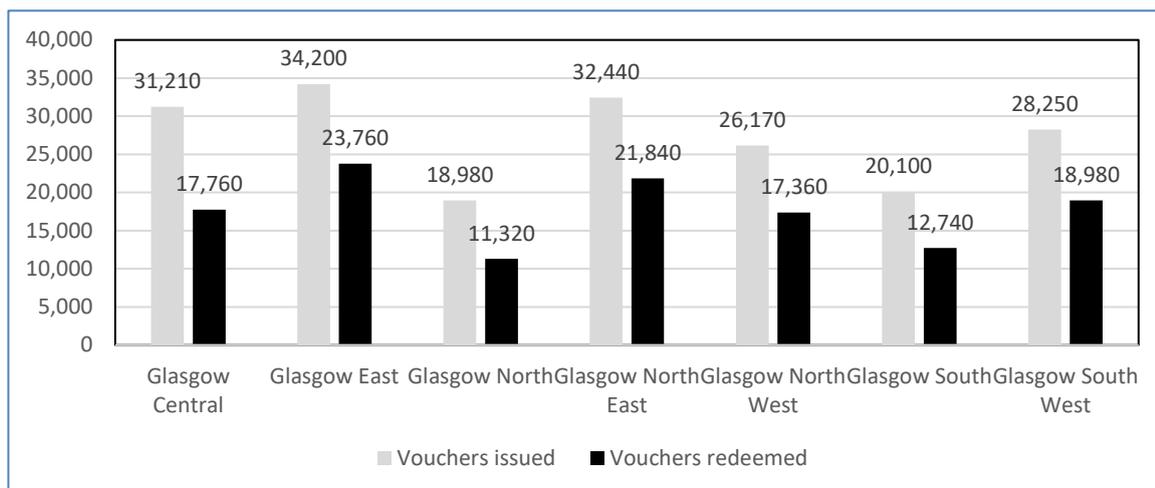
¹⁵ [Could the energy crisis cause a public health emergency? | NHS Confederation](#) ? Ruth Lowe, Hashum Mahmood, 19 August 2022.

¹⁶ Public Health Scotland. [Population health impacts of the rising cost of living in Scotland A rapid health impact assessment](#) Publication date: 6 December 2022

¹⁷ Impacts of the indoor environment in our homes and schools on child health: A novel analysis using the EU-SILC Database. Daniel GEHRT, Marco HAFNER, Sune Tobias GROLLOV and Jens CHRISTOFFERSEN. Conference Paper · June 2021.

¹⁸ Energy Bills Support Scheme GB: payments made by electricity suppliers to customers. Available at: [Energy Bills Support Scheme GB: payments made by electricity suppliers to customers - GOV.UK \(www.gov.uk\)](#)

Figure 5: Volume of prepayment-meter vouchers issued and redeemed in Glasgow city by Westminster parliamentary constituency (October 2022 – January 2023)



In total, 67,590 monthly vouchers were unclaimed across the city. At a household level, this is equivalent to the city losing around £4.5 million to help with winter energy costs. Although suppliers were obliged to make several attempts to contact those who have not redeemed their vouchers, including training call centre staff, and sending representatives door-to-door, the scheme places emphasis on a digital first approach.

Households with smart prepayment meters can access voucher payments by switching to ‘smart mode’. Suppliers can also send voucher codes by text or email, which allows householders to top up online. Those not accessing via the digital route could receive vouchers by post to be redeemed at a local Post Office or shop with PayPoint logo, after showing a UK driving licence or energy bill with the same name/address.

This low uptake could be partly explained by language barriers and digital exclusion. Literacy problems and having English as a second language (ESL) can lead to people misunderstanding critical information¹⁹. In 2019-2020, over one in five of Glasgow’s citizens were born outside the UK, and thousands of asylum seekers and refugees were offered tenancies over the last decade²⁰.

A study in Newcastle revealed how the move towards digital government agencies can further increase social inequalities, as one in five UK citizens lack at least one of the basic digital skills required, meaning that people already struggling to navigate systems face further difficulties²¹. People may also lack access to computers, internet, and smartphones, have little or no experience of using digital technology, or may not trust digital platforms (see comments below on forced prepayment meters). The study found considerable evidence that people were encouraged to seek help from ‘digital carers’ within their social networks to reduce the burden on service providers. Like carers looking after ill family members, and

¹⁹ Harvey, M. et al. (2021) *Understanding the costs and challenges of the digital divide through UK council services*. Journal of Information Science. December 10, 2021.

²⁰ Whyte B, Young M, Timpson K. Health in a changing city: Glasgow 2021. A study of changes in health, demographic, socioeconomic and environmental factors in Glasgow over the last 20 years. Glasgow; GCPH: 2021

²¹ Harvey, M. et al. (2021) *Understanding the costs and challenges of the digital divide through UK council services*. Journal of Information Science. December 10, 2021.

often not recognised, there may be opportunity to look at the scale of and role played by digital carers to support vulnerable excluded households in the city.

This ‘live example’ of low uptake of energy vouchers and digital exclusion is nested within wider efforts to ensure that Glasgow’s citizens claim all types of entitled support. We recognise that the challenges remain significant. For example, recent Department of Work and Pensions data shows that up to £1.7 billion in Pension Credits went unclaimed within the UK, resulting in 850,000 families losing about £1,900 each year. At the same time, £1.1 billion in Housing Benefit went unclaimed, leaving up to 260,000 pensioners out of pocket by £4,000 each year²². Strengthening ongoing efforts to increase uptake of unclaimed vouchers and benefit could help reduce fuel poverty and contribute towards preventing public health harms.

Forced prepayment meters

Recently, there has been growing media attention on the rising numbers of forced fitting of prepayment meters and corresponding warrants that allows forced entry into households. A Times newspaper investigation revealed how some debt collectors were incentivised with bonuses, which in some cases led to household vulnerabilities being ignored²³, including physical and mental health issues. A newspaper Freedom of Information request showed that, in Scotland, at least 4,822 warrants to install smart prepayment meters were granted in the ten months to October 2022²⁴, and other households were being remotely switched over without the need for a court warrant or household consent. In a recent blog commenting on how OFGEM (Office of Gas and Electricity Markets) would tackle such inappropriate practices, the Chief Executive highlighted an example of remote switching in Glasgow:

“However, I have heard directly from people who have faced poor practice from suppliers. For example, one customer I spoke to in Glasgow left to go on holiday and returned to find he’d been switched to pre-pay without his knowledge and had no way to top up²⁵.”

Some charities have expressed concerns that vulnerable households on these type of prepayment meters can have their energy supplies automatically cut, even in freezing conditions, if they fail to keep them topped up. Furthermore, the Scottish Courts and Tribunals Service has said it will review the way warrants have been issued.

Growing awareness of the rising numbers of forced fittings, court warrants, and remote switching without consent could further increase the lack of trust among some of our most vulnerable and excluded households to engage with digital public services. Addressing these concerns, particularly around household energy, will be vital to narrow the fuel poverty gap and overall levels of fuel poverty in Glasgow.

²² Income-related benefits: estimates of take up: financial year 2019 to 2020. Available at: [Income-related benefits: estimates of take-up: financial year 2019 to 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/income-related-benefits-estimates-of-take-up-financial-year-2019-to-2020)

²³ [Ofgem orders British Gas to stop force-fitting prepayment meters \(thetimes.co.uk\)](https://www.thetimes.co.uk/article/2022-10-10)

²⁴ | News [Scottish courts to review warrants for enforcing prepayment meters as calls for ban intensify](https://www.scottishcourtsandtribunals.gov.uk/news/scottish-courts-to-review-warrants-for-enforcing-prepayment-meters-as-calls-for-ban-intensify) 4 February, 2023

²⁵ [Tackling inappropriate energy supplier prepayment meter practices | Ofgem](https://www.ofgem.gov.uk/news/2022/10/10)

LHS Priority 4

We welcome the two missions to increase the supply of affordable housing options to meet the needs of larger families and core social care groups.

As noted elsewhere in this response, as the cost-of-living crisis continues, poorer outcomes around 'heating and eating' will be more noticeable among large families with three or more children²⁶. UK relative child poverty rates are expected to reach the highest rate since 1998-99 by 2027-28 – driven entirely by large families and increasing to 55% for those with three or more children and 77% in families with four or more children.

We welcome the range of social care groups covered in this priority and will focus our comments on mental health.

In terms of people moving after long stays in hospital, important learning can be gained from an evaluation of Tile House, a partnership between a Housing Group and Camden and Islington NHS Foundation Trust in London, to deliver a unique approach to supported housing and recovery for people with complex mental health needs²⁷. Important outcomes included: reducing reliance on expensive NHS inpatient care by reducing hospital admissions, both in terms of frequency of admission and length of stay; and improving quality of life and outcomes for residents by providing a high-quality independent living environment. Beyond the needs of a particular group with complex needs, housing staff could have a broader role to play in addressing population mental health challenges.

We recognise that housing staff can access other support offered by Social Care Direct, Glasgow Helps, the Strategic Hoarding Group and the more recent Complex Needs Service. Launched in March 2022, the service supports people with multiple and complex health and social care needs by acting as an interface between Homelessness, Alcohol and Drug Recovery Services, Mental Health and Justice Services in Glasgow²⁸. However, alongside these responses there is concern among housing staff that they are increasingly moving beyond their traditional roles to provide intensive support to vulnerable households.

A new report from the Glasgow and West of Scotland Forum of Housing Associations on tenancy sustainment and intensive support found that most staff taking part in the study highlighted 'role-creep' as a key concern. In other words, having to managing increased layers of responsibility for vulnerable people. There was some concern around not being suitably qualified to respond to some of the serious, presenting issues: "*I feel like a social worker most days. And an unqualified one at that.*" The key recommendations from the report included: creating a new role for specialist Housing Officers trained in mental health and creating a Housing Liaison role to serve as a conduit for the onward referral of tenants to appropriate HSCP services²⁹.

More generally, there may be opportunities to learn from an evidence review of housing insecurity and mental health in Wales. Some of the review recommendations aimed at

²⁶ Resolution Foundation/Health Foundation (2023) [The Living Standards Outlook 2023](#)

²⁷ Tile House evaluation (October 2014) by Amy Crocker. Available at: [THExecsummaryweb.pdf \(housinglin.org.uk\)](#)

²⁸ [HSCP Complex Needs Service launched in Glasgow | Glasgow City Health and Social Care Partnership](#)

²⁹ [Research-with-GWSF-Members-in-Glasgow-Pressures-on-Tenancy-Sustainment-Services.pdf](#)

local authorities and housing providers included:

- Social and private landlords, and local housing authorities, need to ensure adequate training for staff, so that they can better understand the mental health needs of their tenants, as well as how this may change in relation to different stressors.
- Landlords across sectors, property agents, and mortgage providers should review the information that is given to residents as part of arrears escalation processes and eviction proceedings, as this is a key point at which to signpost mental health support services. This is of particular importance given the proportion of vulnerable households in the private rented sector.
- Private and social landlords need to be recognised as key partners within local housing and social care strategies, alongside floating support services, which support people with mental health problems living in general needs accommodation.
- Co-locating mental health professionals within housing services could improve inter-agency working and holistic support³⁰.

LHS Priority 5

The focus of our response to Priority 5 will be on the Housing First approach to reduce homelessness and supporting vulnerable households in the Private Rented Sector, before concluding with comments on engaging tenants within the rented sector.

Reducing homelessness

The draft housing strategy notes that by July 2022, 264 Housing First tenancies have been provided by Registered Social Landlords in Glasgow. The GCPH recognizes that in scaling up Housing First, local partners will be responding to much higher levels of multiple disadvantages than other Scottish local authorities. There is robust evidence demonstrating a clear overlap between experiencing homelessness, substance dependency, and offending at an individual level – increasing across the life course, with homelessness the most common disadvantage. Those most at risks of multiple disadvantages tend to be younger than 40 years, single, white, male, and concentrated in more deprived neighborhoods³¹.

A bespoke analysis undertaken by Heriot-Watt university, which builds on the Hard Edges Scotland report published in 2019, estimated that the annual Housing First demand for Glasgow was 538. Between 2021 and 2031, this would be equivalent to around 3,560 to meet the demand of people within the homelessness system. This robust analysis is an important marker of the scale and challenges that lie ahead. The local Letting Communities and Plans will be an important framework to support engagement between homeless services, HSCP, and the 61 RSLs to meet these ambitious 10-year markers. In taking forward Housing First in the city, there may be room to learn from key recommendations put forward by Homeless Network Scotland³².

Meeting these challenges over 10 years will require strong allocations policies, alongside a

³⁰ [190327-Housing-insecurity-and-mental-health-in-Wales_final.pdf \(housingevidence.ac.uk\)](#)

³¹ Leave no one behind: The state of health and health inequalities in Scotland. David Finch, Heather Wilson, Jo Bibby. January 2023. Available at: [HF_Health_Scotland_Web_Final.pdf](#)

³² [Housing-First-Scotland-2022_web1-2.pdf \(homelessnetwork.scot\)](#)

diverse pool of housing providers to make properties available to prospective Housing First tenants. This must be done in a way that does not affect the choice and control of the tenant. In terms of delivery, partners could fully consider the pros and cons of delivering Housing First support in-house versus commissioning. More broadly, changing SWF guidance to allow faster provision of funds and goods could ensure that all local authorities provide a uniform service that reduces the need for local authorities/housing providers to absorb the cost of grace periods for rent while tenants wait for properties to be furnished. Developing local methods to enable Housing First tenants to be *passported* into specialist services (e.g., mental health, addiction services) when required could prevent tenants remaining on long waiting lists. This could enable Housing First support to focus on the goals and aspirations of tenants, while specialist services engage with them to provide support in their area of expertise. Retaining independence of housing support from housing provision is vital, and Housing First tenants need to feel confident with the arrangement.

We recognise there will be important partnership challenges going forward. An interim report of Scotland's Housing First Pathfinder serves as a litmus test regarding the opportunities and challenges involved in scaling up Housing First³³. The authors noted variable success in brokering access to services, particularly mental health. There was some dissonance between the flexible approaches endorsed by Housing First and the comparatively inflexible statutory systems, which remains a perennial problem. Collaborative problem-solving, such as integrating HSCP staff into Housing First teams, could ensure that *passported* approaches are developed (see Priority 4 suggestion on housing insecurity and mental health).

Tackling domestic abuse and preventing homelessness

We welcome the forthcoming Glasgow City HSCP Domestic Abuse Strategy (2023-2028) which acknowledges the early intervention role that housing staff can play. However, there may be a preventative opportunity to extend the comprehensive training strategy directed to HSCP staff and primary care contractors to include housing partners.

There are over 3,800 staff employed across the 61 Registered Social Landlords (RSLs) in the city. Customer facing staff, such as RSL welfare advisers, will be engaging with tenants who may be experiencing parental stress, financial hardships, and poor mental health – important factors that can increase the likelihood of domestic violence within the home. The most recent Scottish Crime and Justice Survey data also shows that fewer than one in five cases are reported to the police. About three in ten told no one, and the full extent of domestic abuse, including the numbers of children witnessing such abuse, is underreported³⁴. Developing a culture of routine sensitive enquiry within the housing sector could help support the aims of the HSCP five-year Domestic Abuse Strategy.

Private Rented Sector

We welcome the focus on the Private Rented Sector, and the significant outcomes achieved by the PRS Hub will remain important. There is a strong case for scaling up this type of project, given the size of the PRS sector in Glasgow. We would welcome the final strategy

³³ Johnsen, S, Blenkinsopp, J & Rayment, M 2021, Scotland's Housing First Pathfinder Evaluation: First Interim Report (full report). Heriot-Watt University, Edinburgh. <https://doi.org/10.17861/c5n3-0h95>

³⁴ Scottish Crime and Justice Survey 2019/20: Main Findings Available at: [Scottish Crime and Justice Survey 2019/20: Main Findings \(www.gov.scot\)](https://www.gov.scot)

noting the relative size of the PRS sector compared to social housing, to provide an indication of what a more scaled up approach could look like. For example, the GCPH Health in a Changing City report (2021) found that 20% of homes in Glasgow were privately rented (around 62,000 homes in total) in 2018 compared with 34% of homes being socially rented²⁰. Moreover, social housing tenants tend to have much more access a range of support services from their landlords to maintain tenancies when compared with PRS tenants.

A study looking at patterns of PRS renting in the UK found that in 2017/18, 42% of adults under 40 in poverty lived in private renting, almost double the rate 20 years ago³⁵. For children in poverty, 33 per cent were living in private renting – a threefold increase from 20 years ago. This is likely to continue through primary and even secondary school years. Frequent moves may disrupt social connections to family and friends, which low-income households are particularly reliant on as a source of practical and emotional support, especially single parents. Frequent moves may also disrupt schooling, with longer term impacts on educational attainment. The subjective experience of insecurity could be more problematic for those in poverty, as options are much more limited and the threat of loss of accommodation is likely to be a particular cause of stress.

There is a lack of evidence relating to tenant activism in the PRS, an area that requires more policy attention to address tenants' wellbeing³⁶. Landlords and letting agents need to recognise the value of genuinely involving tenants in decision-making to sustain tenancies, maintain landlord income, as well as supporting tenants' quality of life and health. The housing strategy could support improvements in the PRS most effectively by ensuring that tenant activism is facilitated and that the voices of tenants are heard. Despite the diversity and relative transience of the PRS tenants, effective collective action to improve conditions of many tenants is possible. Any plans to strengthen PRS tenant engagement could be supported within the context of scaling up the work of the PRS Hub.

4. Key Housing Issues

Q8. What are your views on how we can ensure that there is sufficient accommodation of the right type and in the right places to meet the housing needs of students in Glasgow and support vibrant mixed communities?

As noted in the introduction, in addressing the lack of student accommodation in Glasgow it is important that new developments do not lead to concentrated 'student neighbourhoods' that are not integrated with the larger community.

Q9. What are your views on the challenges and opportunities to achieving a high quality and sustainability standards for all new build, including affordable and market for sale, housing developments in Glasgow?

The issue of affordability for low-income households has been an important theme throughout our response. A lot of past attention has rightly been given to welfare sanctions. However, less attention has been given to household deductions from the DWP and third parties, and their impacts on households, particularly families with children. Both council

³⁵ Bailey N (2020) Poverty and the regrowth of private renting in the UK, 1994-2018. PLoS ONE 15(2): e0228273. <https://doi.org/10.1371/journal.pone.0228273>

³⁶ Tenant participation in the private rented sector A review of existing evidence. Lisa Garnham & Steve Rolfe. 16 December 2019. UK Collaborative Centre for Housing Evidence (CaCHE)

tax and rent arrears were the most prominent of all third-party deductions for families in Glasgow claiming UC, staying high up until November 2021. On a wider level, the Scottish Social Housing Charter revealed that as of 31 March 2022, social landlords had total arrears of just under £170 million, which is the highest level of rent arrears since the introduction of the Scottish Social Housing Charter for charter in 2010³⁷.

Q10. Do you think that a target or a quota policy for new affordable housing developments would help to increase the supply of larger sized affordable homes? Please tell us your views.

As noted in our response to Q12, ensuring ongoing annual monitoring and reporting of demand for affordable social housing (regardless of household type) will be a vital indicator to ensure the overall target is achieved.

We welcome that the draft strategy recognises the need to increase the supply of larger sized affordable homes. Throughout our response, we have highlighted the poorer outcomes facing larger families with children and how the marked increase in child poverty rates by 2027-28 will significantly impact on large families. Equally, we are concerned that placing emphasis on particular types of households could lead to competition and perhaps the needs of other households being overlooked – namely, young, single men at risks of multiple disadvantages and eligible for homes through the Housing First approach.

Q11. Please tell us your views on what level of priority you think the Council should set for tackling the issue of long term empty homes and whether you think that the Council requires more enforcement powers to address this issue?

We welcome the establishment of a target to bring 1,000 empty homes back into effective use. We do not have any specific comments on the level of priority or enforcement powers. However, we do have some reservations around how allocation is managed among larger families, homeless people and those with a variety of support needs. It is important that empty homes do not automatically become the first offer for these groups.

Q12. What do you think is the most urgent housing issue in Glasgow that needs to be addressed and why?

The most pressing priority is to deliver more affordable homes. As the draft report notes, there were over 64,000 applications held on RSL housing registers across the city. This was equivalent to 10 applicants waiting on housing registers for every home let during the previous 12 months. We acknowledge that this is not an exact measure, as an applicant could apply to register with more than one RSL provider. Linked to this point, ensuring that a robust single source of data captures demand across the RSLs must be given more priority. We welcome the two actions of developing a Digital Common Housing Register to improve access to housing, data collection and delivery of online services, and exploring the potential of developing a Digital Housing Data Framework with Registered Social Landlord partners.

Ongoing annual monitoring and reporting of demand for affordable social housing will be a crucial indicator as to whether the targets to provide affordable homes are being met or need to be revised throughout the duration of the new strategy.

³⁷ [Inside Housing - News - Social housing rent arrears hit record levels in Scotland](#)

In taking forward the Digital Common Housing Register and Digital Housing Data Framework, it will be important to ensure that these new digital approaches do not further increase inequalities around access, particularly among citizens already lacking basic digital skills/resources and struggling to navigate existing housing systems.

5. Engaging Partners

Glasgow's Draft Local Housing Strategy 2023-28 is a partnership plan that seeks to engage everyone, individuals, groups and organisations, across Glasgow, to work together to achieve the vision and outcomes.

Q13. What key action or actions do you think you or your group / organisation can take to contribute towards meeting Glasgow's Draft Local Housing Strategy vision and outcomes?

The GCPH will continue to gather public health evidence and generate insights to support new approaches to tackle the enduring inequalities in the city. We will also work alongside a wide range of partners to conduct research of direct relevance to policy and practice that encourages fresh approaches to support development and change.

6. About You

Q14. Please tell us if you are responding as an individual or on behalf of a group or organisation.

- Individual
- Group
- Organisation

Q15. If group or organisation, please provide the name of the organisation and a brief description Group / Organisation name:

The Glasgow Centre for Population Health, Third Floor, Olympia Building, Bridgeton Cross, Glasgow G40 2QH. Telephone: 0141 330 2747 info@gcph.co.uk

Description of Group / Organisation:

This is an organisational response from the Glasgow Centre for Population Health (GCPH). Based in Glasgow, the GCPH was established in 2004 to generate insights and evidence, support new approaches, and inform and influence action to improve health and tackle inequalities. The GCPH is a partnership between NHS Greater Glasgow and Clyde, Glasgow City Council, and the University of Glasgow, funded by the Scottish Government.