Where to Turn

A review of housing support and advice for private tenants in Scotland

A report to Shelter Scotland April 2019

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Disclaimer

The views expressed in this independent report are those of the authors alone and should not be assumed to be those of Shelter Scotland or the organisations that participated in the study. Any errors or omissions are the sole responsibility of the authors.

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EXECUTIVE SUMMARY

Background

The Oak Foundation funded a two-year pilot project known as the Letting Agent Plus (LAP) Project. It involved Shelter Scotland working in partnership with a cohort of letting agents operating across 18 local authority areas in central Scotland to assist letting agents to access services for tenants who needed advice and/or support to access or sustain tenancies in the private rented sector.

Shelter Scotland commissioned this study to gain a clearer understanding of the provision of housing related information, advice and support services that are available to private tenants and the role such services play in tenancy sustainment. The study focused mainly on the LAP Project local authority areas and explored issues surrounding the local strategic approach to advice and support, service availability and accessibility and the potential scope to enhance service provision for private renters. The study was undertaken between October and December 2018 and involved a mix of methods including a rapid review of existing research and policy as well as council web-based information for the 18 LAP local authority areas. This was supplemented by a survey of all 32 local authorities in Scotland and interviews with national bodies, council, service providers, letting agents and landlord representatives.

Policy and Funding Framework

There is no single overarching policy framework for the delivery of information, advice and support in Scotland. Instead, responsibility for providing such assistance is shared across numerous policy domains such as health, social care, economic development, environmental health, financial inclusion, poverty and debt reduction and housing. Likewise, many national and local public bodies as well as commercial and 'not-for-profit' bodies are engaged in delivering advice and support. Services tend to be 'multi-channel' and use a mix of web, telephone and face-to-face communication.

Public funding for advice and support comes from the Scottish Government, local authorities and other bodies such as NHS Scotland and the Scottish Legal Aid Board. In the case of housing, the Scottish Government directly funds independent agencies to provide information and advice. Funding priorities are often linked to specific national strategic or policy objectives such as those related to homelessness, housing options, welfare reform, energy efficiency or anti-poverty measures. In addition, individual service providers utilise their own income or resources to support service provision and, for some, access to charitable funding is also an important funding source.

Private Rented Sector Profile

In Scotland, the private rented sector has grown rapidly in the last two decades. Between 1997 and 2017 the proportion of households living in the sector trebled from 5% to 15% and today some 360,000 households, and 823,500 people, in Scotland are private renters. Half (52%) of all private renters live in a household represented by someone under the age of 35 years, indicative of its role in housing students, young professionals and key workers in full-time work but the

numbers of tenants in their forties and fifties is rising, reflecting an increase in long-term, and potentially lifelong, renting. In 2017, a third of all private renters were aged between 35 and 59 years. Although single persons and couples living in self-contained or shared housing continue to dominate the sector, the resurgence in long-term private renting has led to a marked increase in households with children that live in the sector. The income profile of private renters has also diversified. A third of private renters have a net income of £30,000 or more but, at the other end of the spectrum, a quarter had a net income, including Housing Benefit, of £15,000 or less (SHS, 2017).

The Advice and Support Needs of Private Renters

Evidence from the study point towards money issues, the accumulation of rent arrears and other debt as being common factors driving the advice and support needs of private renters. The costs of renting in the sector also appear to be a key influence in approaches to housing options or other advice services. Financial hardship among private renters has a multiplicity of potential causes including: loss of employment or relationship breakdown; difficulties in claiming welfare benefits and issues with the administration of benefits (i.e. processing delays, Housing Benefit suspensions, Universal Credit); or benefit sanctions. Aside from the financial and affordability drivers, problems with disrepair, neighbour disputes and landlord harassment were also cited by stakeholders as issues affecting private tenants.

Local Strategic Responses to Advice and Support

Local Housing Strategies, Community Plans and the more recent Anti-Poverty Strategies tend to be the main processes through which local authorities and their partners attempt to address advice and support needs in their areas. Often these are pitched more broadly at the wider population or specific groups (i.e. homeless) rather than focusing on specific tenure-based needs, such as those of private renters. Generally local strategic priorities in respect of the private rented sector are predominately centred on statutory duties such as regulation and landlord registration with most local authorities responding to our survey indicating that their council's strategic priorities are orientated in this manner. Demand for private renting is generally regarded as high in most local authority areas and many local authorities are increasingly turning towards the sector to meet housing needs. However, there is a lack of evidence about the needs of private renters and associated gaps in service provision. The lack of evidence to inform local commissioning strategies for advice and support is perhaps exacerbated by the fact that strategic partnerships in respect of private renting are commonly under-developed. Local authority staff generally aspire to adopt a more strategic and customer focused approach to private renting, but this is somewhat hindered by resource availability and, in some cases, a lack of political commitment.

Accessing Advice & Support

Letting agents and advice providers report that many private tenants are still in the dark about their rights. While there has been some improvement in information provision at both national and local level, tenants who approach services do not always appear to have access to this information or do not understand it. Local authority survey respondents also generally doubted

that private renters are in a position to use published or online information to resolve their own problems. This suggests that a critical issue for private renters is to have swift and easy access to good advice during a period of transition such as loss of work, relationship breakdown or the onset of ill health.

A commonly cited perception is that private tenants do not always talk to their landlord or seek information and advice when difficulties first arise and that too many private renters only seek advice at the point when these problems have escalated to crisis point, limiting what can be done to resolve the situation and prevent eviction. This is exacerbated by other issues such as: a hesitancy to seek help due to the potential fear of landlord repercussions; lack of awareness of services and how they can help; limitations of web-based information and traditional service structures (i.e. opening hours); and ineffective signposting or referral.

Few private renters appear to be in receipt of housing support services and, those that are, tend to have experienced homelessness which appears to be the main access route for this type of service within a local authority. Other influencing factors in this can be that initial approaches to housing options or advice services from tenants are based on financial or property issues rather than wider health or social needs that people are reluctant to discuss. Referral processes for housing support are sometimes viewed as slow or unresponsive whereas private landlords are looking for a fairly swift response to resolve tenants' needs.

In the study landlords and letting agents said it is not clear where to signpost tenants or who they should contact directly if a tenant is experiencing difficulties. In addition, given the demand and operating context for housing support services, private renters may simply be deemed as not having the level of need to meet the threshold to access a service. Several stakeholders also suggested that one reason for the relatively low take up of housing support by private renters is that the private rental market operates in a way that tends to 'filter' out households with more complex needs, especially in areas where there is strong demand.

Overall, letting agents and others generally perceived that more could done, without too much effort or resources, to communicate more clearly with private landlords and letting agents on what services exist in the local area and how to access them.

Housing Options, Advice & Support Services

Housing Option Services are now one of the main vehicles through which local authorities deliver tailored information and advice to households to enable them to resolve their housing related problems. Local authority websites generally contain an overview of housing options that are available in the local area, albeit this information tends to be pitched towards people facing a housing crisis (i.e. homelessness) rather than people looking to take steps to sustain their home or find a new home. Private rented web-based information typically contain links to local authority produced leaflets and newsletters, although these tend to be written more for landlords than tenants and cover matters such as legislative changes, the repairing standard, LHA rates and landlord registration. However, as local authority survey respondents generally agreed, it is not always easy to navigate to other relevant online council and partner information such as money advice.

Overall local authority online information continues to be guided more by their statutory duties in respect of private renting and homelessness than by the information likely to be sought by, and be of value to, private renters. In our opinion, local authorities could improve the quality, relevance and attractiveness of their online information by making better use of resources already available within and outside the council. Similarly, it is evident that there is scope to improve the Housing Options Service offer for private renters in many areas and to draw on the wider organisational and service structure. Where they exist, specialist housing advice services can be well placed to provide proactive advice and support to private renters that have more complex issues and needs.

There is a broad consensus that there is an element of hidden or unmet demand for advice and support among private tenants, but this is coupled with doubt over the capacity to meet this demand. Several national and local stakeholders also believe that private renters have less access to advice on income maximisation and claiming benefits when compared to social renters.

Housing support services are usually accessed by referral, most commonly from the Housing Options Service or another local authority housing service. Local authorities generally operate a mix of directly provided and externally commissioned housing support services, although the balance varies from one local authority to another. Independent housing support services that work with private renters, or individuals willing to take up a private let, stressed the importance of developing close working relationships with private landlords to both source properties and promptly resolve any issues encountered by service users or their landlords.

The study found that without more effective pathways to access services, a greater political willingness to prioritise prevention and provide more resources to enhance community services, private renters were likely to continue to struggle to access housing support prior to the point at which they applied as homeless. This is also undermined by the lack of direct knowledge and evidence of the needs of private renters.

Conclusions and Recommendations

Ensuring households living in the private sector have access to advice and support when needed is vital. Not only will it improve the sustainability of private tenancies, but it will also relieve pressures elsewhere in the wider housing system. Recent Scottish Government legislative and policy changes in relation to tenancy arrangements, property condition and consumer redress also assume private tenants will have access to advice and support when needed.

While evidence from this study suggests that a proportion of private tenants have more complex needs, for most private tenants' rapid access to money and debt advice services, including assistance with claiming welfare benefits, is the key to tenancy sustainment. Currently access to such assistance appears to be hindered by various factors. These include local strategic gaps in knowledge of private tenants needs for advice and support, lack of awareness of existing services and fragmentation of service approaches. Public sector resource constraints and their influence on local priorities, service delivery structures and increasingly tight access criteria for some services also potentially exclude those that have not reached a 'housing crisis' threshold. The net result appears to be that private renters unsure of 'where to turn' for help are often left reliant on low-level information provision on where and how to seek assistance.

Our main learning points and suggestions are that:

- Local strategic plans (housing, community plans, health & social care etc.) should better reflect the advice and support needs of private tenants with associated actions and outcomes.
- Local authorities and partner agencies should ensure their approach to housing options and digital information provision is based on the needs and customer journey of private tenants.
- Local authorities and partner agencies could 'trial' a single point of contact for private landlords and letting agents to improve referral routes and access to support and advice services.
- Private landlords, letting agents, local authorities and other local stakeholders work in partnership to enhance understanding on the needs of private tenants and to devise an action plan to improve the visibility of, and access to, services.
- Local authorities and partner agencies should ensure that specialist advice services are available for private tenants with more complex issues including those from ethnic minority communities.
- Local authorities and landlord representatives consider joint forums and training sessions for private landlords and letting agents on good practice in relation to tenancy sustainment, arrears and welfare advice.
- The Scottish Government works with relevant partners to consider the potential use of Section 11 data to inform local evidence bases and to revise Local Housing Strategy guidance to strengthen links between housing options and wider advice/support approaches at local level.
- The Scottish Government conduct or commission research to examine the advice and support needs of specific groups of private tenants and the appropriate channels for delivering services.

1.INTRODUCTION

Study purpose

In the last two decades large numbers of households have responded to changes in the housing system by renting from a private landlord, often long-term. This has been accompanied by increasing diversity in the age, composition, incomes, needs and expectations of private renters. Whilst most private tenants manage their tenancy without any assistance, others experience difficulties that can chip away at their ability to sustain their tenancy. The ability of private renters to access accurate information about rights, responsibilities and entitlements plus advice and support to realise these and to cope with any changes in their circumstances that could threaten their tenancy is therefore key to the Scottish Government's ambitions for a well-functioning private rented sector.

The recently concluded Letting Agent Plus Project (LAP project), which was funded by the Oak Foundation, involved Shelter Scotland working with a group of letting agents and other organisations to improve the sustainability of private tenancies and to reduce the incidence of tenancy issues escalating to a crisis. Evidence that emerged from this project suggested that both letting agents and private tenants could struggle to access the services of local authorities and other agencies that offer information, advice and support. Shelter Scotland therefore commissioned this exploratory study to gain a clearer understanding of the provision of housing related information, advice and support services that are available to private tenants and the role such services play in tenancy sustainment. Focusing mainly on the 18 local authority areas across central Scotland where the LAP project operated, the study sought to explore, where feasible, the following questions:

- To what extent do local authorities address the information, advice and support needs of private tenants in their written strategies and plans?
- What challenges and barriers do private renters and letting agents face in identifying and accessing services especially housing support?
- What information, advice and support services are available to private renters and does this range of services differ significantly from those available to social rented tenants?
- What is known about the general effectiveness of services in terms of sustaining private tenancies and what challenges do local authorities and service providers face in sustaining these services?
- What scope, if any, is there to enhance the provision of housing related advice and support provision for private renters, if possible considering any cost and skills implications?

Implicit in these questions is the broader issue about the potential to shift from a crisis response to prevention and early intervention for households that rent from a private landlord; an issue central to the work of the Homelessness and Rough Sleeping Action Group and the Scottish Government and COSLA "*Ending Homelessness and Rough Sleeping: Action Plan*" issued in November 2018.

Definition of housing related information, advice and support

As far as practical and resources permitted, the study sought to consider services aimed at the general public as well as those aimed specifically at private renters that appeared to offer:

- Basic information such as published and online documentation of private tenants' rights and responsibilities and signpost services that can offer further advice and support.
- Telephone or face-to-face information and advice that can set out the options available to a person to address their housing and related issues such as money management, claiming welfare benefits, health issues and if necessary can broker access to other services.
- Casework based advice that works with individuals to take action to resolve their housing related problems including negotiating with third parties such as landlords and the DWP.
- Housing support that provides practical and emotional assistance to enable someone to secure and maintain a suitable home, achieve personal goals and live independently in the community
- Measures to improve the accessibility of private renting such as rent deposit guarantees.

Study approach

This study was carried out between October and December 2018 and involved a mix of methods. One strand was a rapid review of available research, national policy documents and LAP project caseload data. We also scanned the strategy documents and web pages relating to private renting and associated issues such as money advice of local authorities that operate across the LAP project area, including a detailed review of seven LHS documents.

A second strand was an online survey for all 32 local authorities, which ran from mid-October to the end of November 2018 to gain local authority staff impressions of local service provision. In spite of ALACHO issuing a letter of support and the study team issuing reminders, providing pdf versions of the survey to any local authority that requested, only 15 local authorities submitted a useable survey. We somewhat compensated for this disappointing response rate by increasing the numbers of local authority documents and websites we scanned, but the survey data presented in this report should only be considered to be indicative. Ideally, it would have been helpful to have 'tested' the survey with local authorities, but the timescale did not permit this. In any case, feedback from local authorities suggests that the survey was given a low priority due to competing priorities, most significantly the preparation of Rapid Rehousing Plans.

The final strand of work entailed a mix of face-to-face, telephone and small group discussions with 30 individuals from national bodies, local authorities, service providers, letting agents and landlords to tap into their collective knowledge base. The interviews sought to elicit: how, when and under what conditions private renters seek out advice and support; the types of interventions that appear to be beneficial in assisting households sustain their private tenancy; and the opportunities and challenges for improving the provision of housing related information, advice and support.

Report structure

This report is divided into 6 sections, including this one. Section 2 contextualises the study. It outlines the growth and increasing diversity of private renters, the policy framework for private renting and the provision of advice and support and the housing related issues experienced by private tenants that the LAP project has engaged with. Section 3 looks at what local strategies have to say about the advice and support needs of private tenants. Section 4 looks at the ease or otherwise with which private renters and letting agents can access advice and support. Section 5 considers the range of information, advice and housing support services that are available, whether they appear to be attuned to the needs of private tenants and the challenges that councils and service providers face in delivering and sustaining services. Finally, section 6 draws together what we have learned from this small scoping study, including suggestions for policy and practice and further research.

2. SETTING THE SCENE

The changing face of private renting

The private rented sector has grown rapidly in the last two decades. Between 1997 and 2017 the proportion of households living in the sector trebled from 5% to 15% and today some 360,000 households and 823,500 people in Scotland are private renters. As figure 2.1 shows, the upward trend in private renting has been most pronounced in Scotland's four main cities. Private renting is now the second largest housing tenure after homeownership in the local authority areas of Edinburgh, Stirling and Perth and Kinross.



Figure 2.1: Growth in private renting by local authority area, average 2001-3 to 2015-17

Source: Scottish Government (2018) Scottish Household Survey: local authority tables for 2017 Note: Percentages based on 3 year average due to fluctuations in annual figures for many local authorities.

The growth in private renting has not been confined to Scotland or the rest of the UK. Many countries such as Australia, Spain, the Netherlands, Ireland and Scandinavia have also seen an upward trend as access to other tenures has become more problematic (Whitehead et al, 2016,

Robertson and Young, 2018). The diversity of approaches to the regulation of private renting in these countries suggests that the interaction between the housing system and wider socioeconomic processes has been more influential in driving the growth of private renting than policy matters such as existence or absence of landlord registration, rent control and security of tenure.

Demand for private renting has been strongly influenced by a heady mix of factors. These include house price inflation, the contraction of the social rented sector and the growth in single person, migrant and student households. Stricter mortgage requirements, greater job insecurity, a lack of wage growth and growing student debt have also dampened demand in the period since the global financial crisis of 2008-09. On the supply side, fiscal policies have facilitated the expansion of credit to fund the buy-to-let and have encouraged small investors to divert their personal savings into the sector. Low interest rates have further stimulated investment as the private rental market has come to be viewed as a more attractive and less volatile option than other forms of investment and savings (Stephens et al, 2018; Rugg and Rhodes, 2018; Baxter and Murphy, 2018).

Landlord composition

For some years both the UK Government and the Scottish Governments have sought to encourage the growth of institutional investment and large corporate landlords. Although measures to promote mid-market rent (MMR) and built-to-rent (BTR) initiatives has led to some increase in properties owned by 'corporate' landlords, the large majority of the stock continues to be owned by 'micro landlords' that own one or two and rarely more than five properties (Crook et al, 2009; and Bailey 2017). Scotland is not unique in this regard. Even in Germany, where private renting is the single largest tenure, 65% of private rented properties are owned by individuals and other 'micro landlords' rather than large scale companies or institutional investors (Martin et al, 2018).

Micro landlords have diverse reasons for investment, but most expect to secure a return from rental income or capital gains, or a combination of both. However, some incidental landlords tend to be motivated by non-financial reasons, such as being unable to sell or expecting that they or their relatives will live in the property in the future (Crook et al, 2009; and IPPR, 2018). The composition and motives of larger-scale landlords are also diverse. Some of the larger providers are subsidiaries of registered social landlords (RSLs) and other organisations that have a social rather than purely commercial intent.

Letting agents

Landlords often use letting agents to set up and/or manage a private let. There could be anywhere up to 1,600 letting agents operating in Scotland but little is known about them. Rugg and Rhodes (2018) have reported that letting agents are involved in two fifths of private lettings in Britain. They also report that agents are less likely to deal with the bottom end of the market and are more likely to deal with households in work. In 2012 the Scottish Government re-affirmed that it was illegal for letting agents to charge fees to tenants. This could have been seen to imply that landlords were the principal customer of agents. However, measures to strengthen the regulation of letting agents, coming into force in 2018, clarified the service standards that both landlords and tenants should expect from their agent.

Private tenants

The re-structuring of local housing systems evidenced by the growth in private renting and the decline in owner-occupation and social renting has not impacted all households in the same way.

Whilst the proportion of older households that are private renters has remained low (4%), the Scottish Household Survey confirms that the composition of households of working age that live in the private rented sector has diversified. Just over half (52%) of all private renters live in a household represented by someone under the age of 35 years. This is indicative of the long-standing role of private renting in urban centres in housing students, young professionals and key workers in full-time work. That said, the proportion of all younger households that are private renters has risen sharply from 25% in 2007 to 41% in 2017, buoyed by households that have been unable, or unwilling, to access other tenures. More people are also continuing to live in the private rented sector into their forties and fifties, reflecting an increase in long-term, and potentially lifelong, renting. In 2017, a third of all private renters in Scotland were aged between 35 and 59 years. Moreover, in the last decade the proportion of all households represented by someone aged 35-59 years that rent privately has doubled to 12%.

Although single persons and couples living in self-contained, or shared, housing continue to dominate the sector, the resurgence in long-term private renting has led to a marked increase in households with children that live in the sector. In 2017 some 26% of private renters were families or lone parents (SHS, 2017). The income profile of private renters has also become more varied. A third of private renters have a net income of £30,000 or more but at the other end of the spectrum a quarter had a net income, including Housing Benefit, of £15,000 or less (SHS, 2017). The result is that not all private renters are living in a tenure which is ideally suited for their needs. This has, as discussed later in the report, created challenges for tenants, landlords, letting agents as well as local authorities and organisations involved in the provision of advice and support.





Source: Scottish Government & DWP (2018) Family Resources Survey (FRS) Households Below Average Income (HBAI) dataset. Figures are calculated on 3 years of pooled data to help ensure statistics are robust.

Figure 2.2 illustrates the increase in the numbers of people in AHC relative poverty since 2009, which is defined as having a net income, after housing costs, below 60% of UK median income. It

shows that the increase in relative poverty has been strongly influenced by the upward trend in private renters in relative poverty. Overall:

- 280,000 individuals in the private rented sector are in AHC relative poverty, of which 200,000 are in severe poverty, meaning they have an income below 50% of the UK median income.
- 34% of all private renters are in AHC relative poverty, which is only marginally below the comparable rate for social tenants of 38%.
- 28% of all Scotland's residents that experience AHC relative poverty are private renters, up from 17% a decade ago.
- 30% of all children in Scotland that live in poor households now live in the private rented sector.

The low living standard of substantial numbers of private renters is in part indicative of the high cost burden of private rents. The Scottish Government (2018) estimate that in the 3 years to the end of 2015-16 almost two fifths of privately renting households were spending more than 30% of their net income on housing costs compared to just under a third of social renters.

Welfare reform has also reinforced income inequalities and heightened affordability difficulties for lower paid and out-of-work private renters. In particular, the four-year freeze of LHA rates and most welfare benefits for people of working age plus the restriction of eligible housing costs to the LHA 'shared accommodation' rate for people under 35 years have all made it more difficult for lower paid and disadvantaged tenants to pay their rents. The IFS (2017) reports that these and other measures have reduced the Housing Benefit entitlement of two-thirds of low-income private renters. The roll-out of Universal Credit is creating further difficulties for private tenants and landlords alike. A recent survey of 2,234 private landlords found that 61% said they had tenants on Universal Credit that had gone into arrears in the past year. The study also estimated that, on average, claimants were £2,390 in arrears, an increase of 49% on the previous year (Simcock, 2018).

Affordability difficulties are most likely compounded by the high rates of turnover in the private rental market. On average, private renters live at the same address for around 3 years but 41% have moved within the last year (Livingston, et al 2018). Stakeholders told us that private renters that claim state benefits are particularly disadvantaged in Edinburgh and other pressured local markets where there is stiff completion for private lets from students and households in work that do not have to rely on benefits to pay their rent. There is also some evidence that affordability problems and insecurity of private renting can adversely affect the wellbeing and mental health of younger private tenants on the lowest incomes (McKee and Mihaela Soaita, 2018).

The developing policy and regulatory framework for private renting

Throughout the UK, the policy and regulatory framework that governs private renting has struggled to keep pace with developments in the sector. The Scottish Government initially pursued piecemeal measures such as private landlord registration and the use of tenancy deposit schemes. In 2009 however, it initiated an extensive and lengthy process to build consensus around how to modernise the framework governing private renting in a way that would inspire consumer confidence and strike a fairer balance between the interests of tenants and landlords.

This culminated in *"A Place to Stay, A Place to Call Home: A Strategy for the Private Rented Sector in Scotland"* in 2013. This was followed by The Private Housing (Tenancies) (Scotland) Act 2016 and the Letting Agent Registration (Scotland) Regulations 2016.

These reforms have brought Scotland more closely into line with international developments (Robertson & Young, 2018). The private residential tenancy should improve security of tenure and the predictability of annual rent increases for private renters, at least for those who sign a new tenancy agreement from 1 December 2017. It has effectively introduced open-ended private tenancies. It will be interesting to see whether this leads to a decline in the proportion of private renters that occupy a property for less than two years, which currently stands at 44%. It has also ended 'no-fault eviction' for tenancies commencing on, or after, the 1st December 2017, and given tenants greater powers to challenge annual rent increases, in the first instance, by referring their case to a rent officer. Moreover, the recently established the *First-tier Tribunal* for Scotland (*Housing and Property Chamber*) alongside measures to improve the regulation of letting agents have the potential to make it easier to resolve rent, repair, eviction and other issues that arise between tenants, landlords and letting agents.

What impact the combined effect of the new regulatory framework, changes to property taxation, the tax treatment of rental income earned by individual private landlords and the ongoing roll-out of Universal Credit will have on the investment behaviour of private landlords is far from clear. Consequently, the likely scale and composition of private rental markets across Scotland is also far from clear. What is clear is that the new regulatory framework is based on the assumption that private tenants will have the knowledge and confidence to enforce their rights and, if necessary, use the Tribunal to challenge poor service, disrepair and unreasonable rent increases. In anticipation of this, the 2013 private rented strategy talked about the need to raise consumer awareness and stated explicitly that:

- Local authorities had a crucial role to play in ensuring the provision of information and advice to tenants whilst also acknowledging the important role of Shelter Scotland and other organisations in this regard.
- The Scottish Government would continue to work with stakeholders to ensure "vulnerable tenants" are supported through delivery of the Strategy and Welfare Reform, including the roll-out of Universal Credit.

One of the strategy's 10 key actions focused on information and advice. This led to the creation of the Renting Scotland website. It was launched in 2013 to coincide with the Tenant Information Pack becoming mandatory for all private landlords to give to their tenants.

Information, advice and support policy framework

There is no single overarching policy framework for the delivery of information, advice and support in Scotland. Instead, responsibility for providing such assistance is shared across numerous policy domains such as health, social care, economic development, environmental health, financial inclusion, poverty and debt reduction and housing. Likewise, many national and local public bodies, as well as commercial and 'not for profit' bodies, are engaged in delivering advice and support, with some providing cross-sector services and others specialising on specific issues or population groups. For instance, Shelter Scotland specialise in housing advice whilst

the Scottish Citizens Advice Services provide advice on a host of consumer issues, including money and debt and welfare benefits advice. Services tend to be 'multi-channel' and use a mix of web, telephone and face-to-face communication.

The 2011 *Christie Commission on the Future Delivery of Public Services* promoted the crosspolicy value of advice and support in securing better outcomes for people, promoting social justice, preventing problems escalating to a crisis and making best use of public resources. These themes made their way into the 2012 Scottish Government and COSLA *Statement of Ambition* on their shared expectations for community planning. They have also been reiterated in other policies. For instance, advice and support are seen as central to the delivery of integrated, well-functioning and person-centred health and social care. Housing Options has been promoted as a means of helping people to secure suitable housing and reduce the risk of homelessness. On saying that, the Scottish Housing Regulator (2014) has said that local authority Housing Options services do not always provide advice and assistance to people in accordance with homelessness legislation.

The Scottish Government and Scottish Legal Aid Board (SLAB) continue to promote Scottish National Standards for Information and Advice Providers (SNSIAP). Updated in 2016, these standards provide a quality assurance framework for agencies that deliver housing advice, money and welfare benefits advice, and debt counselling. The SNSIAP defines three types of information and advice but this study is focused on the first two. These is active information, signposting and explanation (type I), case work (type II) and advocacy, representation and mediation at tribunal and court action level (type III). The Code of Guidance on Homelessness requires local authorities to ensure that advice and support provision meets these standards but not all local authorities appear to offer SNSIAP accredited services (see appendix 2).

Public funding for advice and support comes from the Scottish Government, local authorities and other public bodies such as NHS Scotland and the SLAB (Stevenson, 2018). In the case of housing, the Scottish Government directly funds independent agencies to provide information and advice. This includes services funded through the Housing Voluntary Grant Scheme, which had a budget of £1.6m for 2018-19. It also provides basic, mainly online, information for both private tenants and landlords.

SLAB's core funding from the Scottish Government is directed towards improving access for those on lower incomes to the legal system but it also administers 'ring-fenced' grant funding programmes on behalf of the Scottish Government and the Money Advice Service. Since 2013, it has managed three such programmes, all of which run to March 2019. From the perspective of this study, the Making Advice Work has been the most important programme¹. Although now largely at an end, it provided some £7.5m in funding to various agencies to assist households cope with welfare reform and debt issues that could lead to court action and homelessness if left unresolved. The Scottish Government directed one of these programme's funding streams towards initiatives for social renters, linked to the introduction of the so-called 'bedroom tax'. No parallel provision was made for private renters.

¹ In terms of the two other SLAB programmes, the Tackling Money Worries Programme helps low-income families and lone parents to cope with a change in their circumstances that poses a high risk of debt and money problems whilst the Early Resolution of Advice Programme (previously the Economic Downturn Programme) offers money and debt advice and/or representation with court action relating to eviction, mortgage repossession, housing cost arrears and small claims.

In spite of the policy focus on prevention, faced with growing demands for services, sustained restrictions on public funding, and the increasing cost of free Personal and Nursing care, Health and Social Care Partnerships have increasingly prioritised people with the most severe care needs. This has been achieved by tightening the criteria for access to social care and now housing support services. In addition, grant funding for services has been cut back. Third sector advice agencies and housing support providers have looked to private and charitable finance plus their own reserves to supplement public funding. However, uncertainty about the financial sustainability of services is deepening. The jury is out on whether Rapid Re-Housing Plans will lead to a growth in funding or necessitate further cost-shunting of support costs on rents and thus DWP budgets.

Total local authority expenditure on housing advice and support is not known. However, the 2018 Coalition of Care and Support Providers in Scotland business resilience survey of third sector social care and support providers reported that some 30% of providers have withdrawn from a contract or handed back a service in the last two years. The Improvement Service (2017) has also estimated that council funding for in-house and external money advice services has fallen from around £21m in 2014-15 to £11.7m in 2016-17. Charitable and private funding bodies are also said to be increasingly reluctant to fund welfare advice, seeing this as a Government responsibility. Crucially short-term funding is hampering the capacity of support providers and advice agencies to innovate and re-design services. It is also making it ever harder to retain experienced paid and volunteer staff (CPPs, 2018; Stevenson, 2018).

There is a lack of robust evidence on the numbers of people that access advice and support, housing related or otherwise, from one year to a next. The Social Care Survey reports some 19,000 people were in receipt of a housing support service in March 2017 (Scottish Government, 2017). This is defined as assistance to enable people to manage their home, such as help with claiming welfare benefits, shopping, managing household budgets etc. This figure is an underestimate as the survey does not record all people that benefit from housing support and not all local authorities' submitted data. The proportion of service users that were renting from a private landlord is also not known. Evidence on the impact of advice and support in terms of the outcomes achieved by service users is also lacking, a problem compounded by the myriad of data collection and reporting arrangements that exist, largely as a result of the different performance management requirements of different funders.

Cases where letting agents sought support from the LAP project

Figure 2.3 summarises the prime reason why letting agents sought LAP Project support for tenants. Money issues and the accumulation of rent arrears and other debt were by far the most common reason for referral. Often tenants had failed to, or were struggling to, claim welfare benefits, usually following a change in circumstance such as unemployment or relationship breakdown. In several cases, financial difficulties had been compounded by Housing Benefit suspensions, overpayments and processing delays which had increased their risk of eviction and homelessness. In some cases, financial hardship has been aggravated by the imposition of benefit sanctions and problems claiming Universal Credit.

People with support needs, typically as a consequence of health problems, were also overrepresented in the LAP Project caseload. Summary case notes indicated that several tenants were experiencing 'money related issues' were also experiencing mental distress. Taking these cases into account, up to 30% of people were experiencing mental distress or more substantive mental health problems.



Figure 2.3: Principal reason tenant case referred to Shelter as part of LAP project project

Source: Newhaven Analysis LAP project caseload data

People referred to the project with money issues and/or housing support needs were geographically dispersed across the LAP area. In contrast, cases where Shelter Scotland had worked with letting agents to secure alternative accommodation were almost executively confined to the wider Edinburgh housing market area.

Letting agents and other stakeholders we spoke to also indicated that money related issues were amongst the biggest reasons why tenants sought out advice and support. We repeatedly heard that DWP welfare reforms had reduced the financial assistance available to private tenants towards their housing and other living costs have aggravated affordability pressures and rent arrears.

Stakeholders also stressed that a large share of private tenants that had sought advice had experienced problems with disrepair such as dampness, condensation, malfunctioning heating systems and getting repairs carried out by their landlord. They also observed that some private tenants had experienced problems of illegal eviction, landlord harassment and neighbour disputes. The fact that such matters were only infrequently recorded in the LAP Project caseload data may be indicative of the fact that LAP letting agents rarely deal with properties at the very bottom end of the market or with unregistered landlords and landlords that persistently flout the law. A couple of letting agents observed that antisocial behaviour poses a major business risk and landlords often move quickly to evict a tenant accused of anti-social behaviour.

3.A LOOK AT LOCAL AUTHORITY STRATEGIES

Private renting representation in strategies and plans

The range of policy and strategy documents produced by local authorities varies but the Local Housing Strategy (LHS) remains the key driver of the strategic approach to the private rented sector. As figure 3.1 shows, the majority of local authority staff that participated in the survey agree that demand for private renting in their area is high (67%) and that their council is making greater use of the sector to meet housing need than five years ago (60%). A majority also concur that it is more difficult for people in receipt of benefits (66%) or homeless people (60%) to secure a private let and that there is a shortage of private rented rooms at the SAR rate for those under the age of 35 years.

In spite of this, LHS strategic priorities in respect of private rented sector in the documents we reviewed were predominately centred on statutory local authority duties such as regulation and landlord registration. Consistent with this, 93% of survey respondents indicated that their council's strategic priorities for the sector were more orientated towards property condition and landlord regulation than to the needs and demands of people living in the sector. Similarly, 73% agreed that there was some mismatch between the strategic and/or service commissioning priorities in respect of private rented sector and the needs of private renters.



Figure 3.1: Local authority views on the demand for and accessibility of private renting

Local Housing Strategies, like other strategy and policy documents, rarely provide a comprehensive picture of the activities of local authorities and their partners but there are three further reasons why priorities in respect of private renting are inclined more towards supply than to demand. First, strategic approaches towards private housing evolved out of the 2006 Act and still have a strong focus on encouraging responsible property ownership and management. Second, housing specific priorities for information and advice are generally linked to preventing

homelessness whilst housing support priorities typically focus on population sub-groups such as those who are homeless, older, with health conditions or a disability. Third, the overarching priorities for information and advice for the public at large, particularly in respect of money and debt advice, are usually set out in other strategies, most commonly in Community Plans, Corporate Plans and to a somewhat lesser extent Financial Inclusion Strategies and Anti-poverty Strategies. Around 87% of survey respondents report that the current or draft Community or Corporate Plan outline priorities for housing related advice, albeit our scan of these documents suggests few refer to the advice needs of private renters.

Examples of LHS statements on Private renting

General PRS statements

"Service improvement and development in the Private Rented Sector is supported and the sector is regulated appropriately";

"we want to support and encourage private landlords in providing safe, well-equipped and affordable housing for rent"

Housing Option Services

"continue to provide advice and assistance on private sector housing issues";

"develop the approach to private rented sector housing to ensure that landlords and tenants have appropriate advice and information available"

Improve access to housing

"Increase the availability of good quality private sector tenancies through the.... HomeChoice Service"

Tenancy and housing support

"Increase tenancy support for private tenants and develop training and education for private landlords"; "Developing relationships and protocols with RSLs and private landlords and to maximise opportunities to prevent homelessness" Six LHS documents we inspected in detail did contain some references to the role of information, advice and housing support services in contributing towards what one local authority described as 'a sustainable private rented sector'. These statements are illustrated in the box to the left.

Although LHS priorities for the private rented sector mainly focus on supply issues and physical condition and management standards, we repeatedly heard from stakeholders that local authorities lack the capacity to effectively enforce standards in the sector and that environmental health services or other departments charged with enforcement are very under-resourced.

Many local authorities also appear to lack dedicated private rented sector relationship teams (real or virtual) that can advise and assist private tenants, landlords and letting agents and mediate in cases.

The establishment of the *First-tier Tribunal* for Scotland (*Housing and Property Chamber*) is widely viewed as a positive

development but there is some scepticism amongst letting agents and advice providers that the Tribunal alone will ensure private tenants, especially those in disadvantaged circumstances, will have the confidence to challenge the poor practice of landlords and letting agents. Letting agents and several other stakeholders therefore called for local authorities to be given sufficient resources to use their regulation and enforcement powers to ensure private lets are of an adequate standard and that landlords are operating legally and professionally in first place. In this context it is worth noting that one local authority, which had recently conducted an inspection programme of 250 private rented properties, told us that 'most' had failed the Repairing Standard.

Local authority understanding of the private rental market

Local authorities tend to have an incomplete understanding about the dynamics of the private rental market and the role the private rented sector plays in different localised markets across their area. Council staff we spoke to have an appreciation of the diversity of needs in the private rented sector but, unlike letting agents, they rarely have a good understanding of market segmentation (e.g. lower paid households, professionals, students, professionals etc) and how the composition of the private tenant base is changing over time and space.

Some local authorities make good use of various in-house and external data, such as Zoopla, City Lets and landlord registration data, but others appear to lack the impetus or resources to analyse the "fragmented and limited" (Livingston et al, 2018) data that does exist. One local authority officer said that they do not routinely extract and analyse data from landlord registration to inform policy whilst another said that their tracking of the sector is limited to looking at changes in the numbers of registered landlords and properties.

Overall, 86% of local authority survey respondents believe there is a lack of evidence about the housing related needs of private renters and gaps in service provision for private renters. This is in spite of 54% of respondents reporting that their local authority has carried out an assessment of private rented housing needs. A further 13% report they are in the process of undertaking such an assessment whilst 33% had no plans in place to do so.

Understanding of private tenant information, advice and support needs

Regardless of the lack of documented evidence, local authority staff mostly believe they have a reasonable understanding of the information and advice needs of private renters, if not their support needs. Figure 3.2 shows that most survey respondents say they have a good or very good understanding of the information (73%) and advice (67%) needs of private renters. Conversely, only 27% say they have a good or very good understanding of the housing support related needs and 20% say their understanding is poor.



Figure 3.2: LA understanding of the information, advice and support needs of private renters

A couple of local authorities told us that they have, or are in the process of, organising consultation events for private tenants. Nonetheless, discussions with stakeholders suggest that local authority understanding of the information, advice and support needs of private tenants can be partial and tends to be based on in-house operational service experience, most commonly the Housing Options Service, rather than also being informed by dialogue with advice providers, letting agents and tenants themselves.

In terms of commissioning strategies for housing support, only two local authorities that took part in the survey are confident that they have clear priorities and outcomes identified for people across different tenures. A further 11 local authorities say that private renters are allowed for in so far as they fall into one of the priority groups for housing support or are threatened with immediate homelessness. A lack of knowledge about the housing-related support needs of private renters is also evident in responses to measuring outcomes. Just three local authorities that took part in the survey say they regularly review the impact of housing support on private renters.

Partnership engagement in strategy development

Developing a deeper understanding of the private rental market and the needs and demands of private renters is hindered by uneven strategic engagement with, or by, partners.

A well-known challenge for local authorities is service fragmentation. Responsibilities for the private rented sector are typically spread other several departments and services. Variations in the structure of local authorities preclude production of a single definitive statement of the full range of local authority departments and services that may have an involvement with private tenants, private landlords or both. Figure 3.3 therefore illustrates the potential range of services, both internal and external to a local authority that can be involved with the private rented sector to a greater or lesser extent.

Figure 3.3: Coun	cil & external services with potential involvement in private rented sector
Local Authority	 Housing service strategy, homeless/housing options, private sector, housing support) Private rented service or team (if exist) Planning (enforcement of planning regulations) Environmental Health and Trading Standards (enforcement and regulation) Corporate Services (usually money and debt advice) Health and Social Care (e.g. mental health, addictions and family support) Council tax/benefits (HB -for now, Council Tax reductions and DHPs) Licensing Service (landlord registration)
	 National and local independent advice services (e.g CAB) Independent support and care services Private landlords and letting agents (including those with a social purpose) RSLs (MMR and also via provision of support services) Factorng services
External Services	 Living Rent and potentially other PRS tenant representatives or groups Third sector bodies (e.g RDGS or bond schemes offered by CRISIS and others) Health Boards and PublicHealth Police Scotland and Fire and Rescue Service

Figure 3.3: Council & external services with potential involvement in private rented sector

It is outside the scope of this project to look at the progress local authorities have made in building effective strategic partnership relationships with this wide pool of potential partners. Figure 3.3 does, however, serve to illuminate the scale of the task confronting housing strategy staff in working towards a more coherent and holistic strategic approach in respect of the private rented sector and the challenges they face in trying to sustain momentum in the face of staff cuts, turnover and organisational change.

Overall, 72% of local authority survey respondents agree that strategic partnerships are underdeveloped and that this hinders their ability to understand the nature, or scale, of unmet need. It also indicates that housing strategy officers continue to struggle to secure commitment from other services across the local authority and beyond and to bring strategic priorities for the private rented sector into alignment with the needs, demands and expectations of private renters.

Table 3.1 shows that local authority survey respondents believe that private landlords and letting agents are more engaged in the strategic housing process than private renters, but in neither instance are they typically engaged to a great extent. Likewise, different local authority departments and public bodies are largely said to be engaged 'to some extent' rather than to 'a great extent'. We also heard that elected members in some local authorities are yet to be persuaded that creating a more sustainable and better functioning private rented sector should be a priority and that this is holding back efforts to develop a more strategic and inclusive approach towards private renting.

"Elected members views of the PRS remain relatively negative.... Strategically it is not at the forefront of their priorities" (local authority housing strategy officer)

To what extent are the following partners engaged in the ongoing strategic approach towards private renting in your council area?			
	To a great extent	To some extent	Rarely or not at all
Private landlords and letting agents	21%	64%	14%
RSLs	7%	64%	29%
Tenants living in the PRS	7%	50%	43%
Third sector service providers (i.e. advice and support agencies)	7%	86%	7%
Health & Social Care Partnership representatives	7%	57%	36%
Representatives from other LA Services (e.g. environmental health, social work, planning etc)	14%	71%	14%
Police Scotland/Scottish Fire & Rescue	14%	36%	50%

Table 3.1: Partner engagement in developing strategic approach to private renting

Engagement with private rented sector

Private landlord engagement

Local authorities tend to have a private landlord representative on their Housing Partnerships but for most letting agents and private landlords, the potential to influence local authority thinking around both strategic and operational matters is through private landlord forums. The pan-Avrshire private rented forum (and the accompanying 'Let's talk' newsletter) was often singled out by stakeholders as an example of good practice. However, the general impression is that both the existence and effectiveness of private landlord forums is variable. Coverage, in terms of

landlord attendance, is often relatively small compared with the scale of the sector. There is little evidence of measuring the impact of forums and their reach. It also seems that forums are mainly used to discuss legislative developments, landlord registration, regulation matters and welfare reform rather than how to improve outcomes for private tenants. One local authority that was seeking to reinvigorate its landlord forum told us it was continuing to prove difficult to generate interest from landlords due to the fragmented nature of the sector. It therefore appears to remain the case that it is easier to engage with landed estate landlords, letting agents and larger scale private letting businesses than with individual, or 'micro', landlords.

The 'missing' tenant voice

The 2013 Scottish PRS strategy said that one of the strategic challenges for improving the PRS would be to encourage "tenants to think of themselves as consumers who can drive improvement within the sector; and supporting landlords to deliver improvement". We found little evidence to suggest that in the intervening period either the Scottish Government or local authorities have actively worked to encourage private tenants to have a stronger voice in shaping strategic approach for the private rented sector or service delivery.

Generation Rent (also known as the National Private Tenants Organisation Ltd) is funded by a mix of individual donations and grants from bodies such as the Oak Foundation. It has helped to facilitate a small but growing network of private renters' groups. So far, however, 'Living Rent', remains the only Scottish member of this network.

More positively, there are signs that private landlords are beginning to take a more active interest in tenant engagement. Aware of the benefits that have been gained from active engagement with its social tenants, one letting agent (RSL subsidiary) has established a tenant participation group to increase the ability of its private tenants to influence service delivery. Shelter Scotland has also established a forum for private renters with funding from the Oak Foundation. It remains to be seen if the private residential tenancy will have a positive impact on stimulating greater private tenant engagement.

Concluding observations

During our discussions, local authority staff generally demonstrated an aspiration to adopt a more strategic and customer focused approach to private renting, often suggesting that private renting had a core role to play is helping to address the rising demand and need for housing. The downside is that most local authorities report they lack the financial and staff resources to achieve this. Sitting behind this are questions about the political will of elected members and senior executives to give a higher priority to private renting alongside upstream measures to prevent homelessness and whether the Scottish Government could do more to incentivise local authorities to do so.

More immediately, competing pressures for local housing strategy resource, not least delivering the affordable housing supply programme to meet the Scottish Government's target to deliver 50,000 affordable homes by March 2021, will almost certainly continue to place limits on the capacity of local authorities to re-think their overall strategy in respect of the private rented sector. However, this should not preclude progress being made to work more closely with partners to improve the visibility and accessibility of advice and support for private renters.

4.BARRIERS TO ACCESSING SERVICES

Factors that shape private renters use of information, advice and support

"There are lots of leaflets and online material, but this is no guarantee that they are read or understood" (national stakeholder)

"Tenants can bury their heads in the sand; they are often reluctant to speak to us when they start falling into rent arrears or even when a 'notice to quit' has been served" (letting agent) "Tenants often do not know where to go with complaints about letting agents or landlords; often they rely on informal advice from family and friends" (letting agent)

"Some tenants leave it too late to contact the local authority, DWP or their landlord, they are already 2-3 months in arrears before they come forward, by which time the landlord has already issued a notice to quit and is unwilling to change their mind" (advice provider)

Accessing information and advice

Letting agents and advice providers report that many private tenants are still in the dark about their rights. The Scottish Government has issued documents that landlords must supply to new tenants,² but we repeatedly heard that tenants do not always read or understand them. Consequently, tenants are not necessarily well placed to enforce their rights and are exposed to unlawful treatment. Local authority survey respondents are also doubtful (64%) that private renters are in a position to use published or online information to resolve their own problems. This suggests that a critical issue for private renters is to have swift and easy access to good advice during a period of transition such as loss of work, relationship breakdown or the onset of ill health.

There is a widespread perception that private tenants do not always talk to their landlord or seek information and advice when difficulties first arise and that too many private renters only seek advice at the point when these problems have escalated to crisis point, limiting what can be done to resolve the situation and prevent eviction. This view is shared by local authorities. Almost two thirds of survey respondents (64%) agreed that private renters typically only approach information and advice services when in a crisis, with only 7% disagreeing.

When asked why private renters do not always seek out information and advice, stakeholders pointed to a number of factors:

- Some are fearful that landlords might look to evict them if they try to enforce their right and entitlements.
- Private renters do not always have enough knowledge about information and advice services, where to find them and how they can help them to address issues that could threaten their tenancy. This point was more frequently made in relation to younger private renters.
- Not all private renters, including younger tenants, are well versed in using the internet for searching for reliable information, weighing up what it means for them and how to act on it.
- Private renters often mistakenly assume that housing advice services, including Housing Options services, are only for people in the social rented sector or people that are homeless.

² For new tenants from 1 December 2017 this is essentially the Private Residential Tenancy Statutory Terms Supporting Notes and for those that signed their agreement prior to this dates the Tenant Information Pack.

- Private renters can struggle to make contact with advice services. We were told that advice phone lines in areas such as Edinburgh are said to be constantly busy due to excess demand and that, after several abortive attempts to get through, private tenants are often inclined to give up.
- Private renters can struggle to use face-to face services due to the limited opening hours of some advice services, especially those in work and those that have to travel some distance to access services.
- Signposting and referral arrangements across local information and advice networks are not always effective and private renters not at immediate risk of homelessness can 'fall through the cracks' and end up being signposted or referred from one service to another without any satisfactory resolution to their issues.
- Private renters that have a negative prior experience of using local authority services, particularly social work, can be reluctant to contact or deal with other council services, which can include local authority Housing Options services and money and debt advice services.

Little is known about the extent to which different private rental markets that operate across Scotland cater for households from a ethnic minority background but discussions highlighted that such households can face additional barriers. We heard that people from abroad often struggled to understand "how the system works". We also heard that English language and literacy barriers compounded difficulties for households in navigating the system and finding out how to access advice and support. A couple of stakeholders also observed that as a result of these difficulties, people often had to fall back on friends and community groups for advice.

Issues around seeking money advice and claiming benefits

In terms of why private renters fail to seek out information and advice on how to claim state benefits or are slow to claim state benefits to which they are entitled stakeholders observed that:

- Private renters in work can mistakenly believe they will not qualify for HB and other benefits. Consequently, they do not seek out information and advice about their potential eligibility, let alone apply for benefits. Some letting agents added that this was more likely to be the case if neither the tenant nor the immediate family and friends were familiar with claiming benefits.
- The complexity of applying for Housing Benefit, Universal Credit and other state benefits created barriers, especially for private tenants that believed they would only be entitled to a small payment or that they were only likely to be claiming benefit for a short period of time.
- The perceived stigma of becoming a 'benefit claimant' and fears of intrusive questioning was also said to discourage some private renters from applying. Examples provided of where this had happened included both low paid workers and well-paid professionals that had lost their job.

More generally, stakeholder discussions indicate that even for private renters that have taken prompt action to seek out advice, the lack of correspondence between Broad Rental Market Areas (BMRAs) and local housing market areas, the indirect imposition of rent controls at the lower end of the market through the 4 year freeze of LHA rates and the imposition of benefit sanctions have all added to the risks of financial hardship, arrears, eviction and homelessness.

Accessing housing support and other community care services

Stakeholders observed that very few private renters are in receipt of housing support and those that do have typically experienced homelessness or have spent time in temporary or supported accommodation. Aside from the lack of service provision, we heard that:

- Private renters can be hesitant to discuss difficult health and social problems and instead focus on financial and/or property disrepair difficulties when they approach Housing Options and other information and advice services.
- Referral processes for housing support, and more especially intensive or specialist health and social care support, are often slow and surpass the length of time a landlord is willing to let matters go unresolved.
- An individual's needs for care and support, particularly those with mental health issues, are only rarely deemed severe enough to meet local authority 'critical and substantial' thresholds for accessing health and social care services.

Letting agents experience of trying to facilitate access to services for their tenants

"The Council structure and the plethora of community services is really complex. We work closely with the council and I previously worked for the council. But we can struggle to get a handle on who does what and who you need to deal with; how can we expect private landlords to know who they have to speak to" (advice provider) "Dealing with the Council is often a convoluted process. Small landlords do not have time or the inclination to work through the system to find out what appropriate service to link up to,

especially in the absence of a known point of contact" (letting agent).

Letting agents observed that they or the landlord were sometimes the first agency to see signs that an individual might be having difficulties. Letting agents typically outlined one or two case examples to illustrate the actions they had taken. These actions included reaching out to the tenant and (if necessary) their family and friends and signposting tenants to Shelter, CAB and other services. However, the most frequent response was to contact the local authority to try and secure financial assistance and/or some other form of appropriate advice and support for the tenant.

On a day-to-day basis letting agents and private landlords can potentially have to grapple with numerous local authority departments and external organisations (see figures 3.3). In terms of seeking to secure appropriate assistance for private tenants, however, most communication centred on a limited number of local authority services.

The point was made that as most cases involved resolving benefit claims, housing services were not typically the first port of call. Letting agents told us that there most frequent day-to-day dealings were with the Revenues and Benefits service to check on the progress of a tenant's HB claim or to find out whether claims had been suspended or stopped and, if so, why. Letting agents report that relationships with the Revenues and Benefits service are generally constructive, although communication and engagement in some areas is better than in others. Often the biggest challenge is to ensure tenants submit a mandate granting permission for their data to be shared with their landlord. However, letting agents and landlords are deeply concerned about welfare reform, especially in relation to the lack of clarity over how the UC housing cost element is to be communicated to landlords and the transfer of administration functions to DWP service centres.

Two further themes came through strongly from letting agents. The first was that the there is much variation in the depth of advice and information tenants receive from Housing Options services, which is an issue discussed further in section 5. The second was that it remains particularly difficult to secure timely access to what letting agents referred to as "support" for private tenants with a combination of housing and health related issues such as mental health, or substance dependencies. This could extend to people that were recently discharged from hospital or prison. We also heard of one case where the letting agent, who had a good day-to-day working relationship with the council, had still found it necessary to speak to several different local authority staff before one of their tenant's with dementia was eventually assessed and provided with a suitable care package. Again, as discussed in section 5, this problem is not unique to letting agents.

Barriers private landlords can encounter

Our discussions highlighted that whilst letting agents tend to employ staff with the skills and knowledge to make contact with the local authority; this is often not the case for small scale or micro private landlords. The overwhelming perception amongst stakeholders from all backgrounds is that private landlord understanding of the system can be as poor as that of private tenants. For instance, one local authority advice provider cited instances of private landlords contacting them who were under the impression that advice services had to be paid for when in fact they are free. Another housing advice and support provider suggested that a part of their job was to provide an informal 'education' role to private landlords to increase their awareness of their rights and responsibilities.

Some local authorities are said to have made good progress in developing streamlined arrangements that make it easier for private landlords to communicate and engage with the local authority. Elsewhere landlords and letting agents said it is not clear where to signpost tenants to or who they should contact directly if a tenant is experiencing difficulties. We heard from letting agents and others that private landlords often choose to give up rather than try to navigate their way around different services to find the right one to talk to. Letting agents and others generally perceived that more could be done, without too much effort or resources, to communicate more clearly with private landlords and letting agents on what services exist in the local area and how to access them.

5. PROVISION OF ADVICE AND SUPPORT NEEDS OF PRIVATE RENTERS

The provision of local authority online information for private renters

Local authority websites generally contain an overview of private renting and other housing options available in the local area. They also publicise the Housing Options service, albeit this service tends to be pitched towards people facing a housing crisis (mainly homelessness) rather than people looking to take steps to sustain their home or find a new home. Stakeholder feedback suggests this partly reflects the lack of resources local authorities have to advise and support households not in immediate risk of homelessness, which was variously defined, but often was understood to mean that a 'notice to quit' or even an 'eviction order' had been granted. Most websites also contain some hyperlinks to external sources of online information and advice for private tenants, such as the Scottish Government, Shelter Scotland and local advice agency websites. However, Glasgow and Edinburgh are amongst the few local authority websites to clearly publicise Renting Scotland. This suggests more needs to be done to promote the recently revamped website.

Private rented sector web pages typically contain links to local authority produced leaflets and newsletters that can be downloaded. These tend to be written more for landlords than tenants and cover matters such as legislative changes, the repairing standard, LHA rates plus landlord registration and accreditation. However, we did find some 'tenantorientated documents, including leaflets about rent deposit guarantee schemes (RDGS).

Examples of council online PRS leaflets and newsletters

- Housing information and advice leaflet
- Housing support: Information for tenants leaflet
- A guide for young people preparing for a new tenancy
- Private renting (a leaflet in one LA area with a range of information on private renting)
- Lead tenancy scheme (aimed at private landlords)
- Private rented sector newsletter
- Private landlord newsletter
- Deposit guarantee scheme: A guide for private landlords and tenants
- The rent deposit guarantee scheme: tenant information

As part of its wide-ranging, and visually attractive, online housing options information service, Dundee City Council's website³ 'walks' people through what the private rented sector can offer, and the issues people should consider when searching for a private let. It also outlines the typical 'private tenant journey' through the process of securing, sustaining and ending a tenancy. Throughout this journey there are links to pertinent information and services. This includes the Dundee 'Homefinder' service, which is a kind of social letting agency that works with letting agents and landlords to help people secure good quality and affordable private rented homes.

"The council website is basic in terms of information and advice provision, although it does signpost to national sites." (local authority survey respondent)

³ <u>http://dundeecity.gov.uk/service-area/neighbourhood-services/housing-and-communities/housing-options-in-dundee/renting-in-private-sector</u>

By comparison, other council websites can be difficult to navigate. Even if someone knows how the local authority is structured, it can be hard to find relevant information, even when it exists. We also found some hyperlinks and information leaflets that were outdated. This suggests that ensuring private rented material is routinely updated and centred on the customer journey is not always a high priority in the face of competing responsibilities and resource constraints. Evidence from the online survey, which allowed staff to reflect on their own local authority's public-facing information for private tenants, lends support to our perception.

Table 5.1 illustrates that staff hold a mix of views about the quality, comprehensiveness and accessibility of public-facing information for private tenants. Most believe that the council's private renting web pages signpost users to national sites (78%), local agencies (72%) and provide contact details for further information (86%). Slightly fewer concur that it is easy to find this online information (65%) or that this information is accessible for those with specific needs, such as people with sight difficulties or from ethnic minority groups (57%). Relatively few agree that it is easy to navigate from the PRS web pages to other relevant online council and partner information such as money advice (35%). Opportunities for private renters to influence web-based content also appear to be under-developed, with few local authorities reporting they monitor user experience or use consumer feedback to update and improve the content and design of the council's private rented web pages.

Thinking about your council's online and paper-based information products in relation to private			
renting, please rate how strongly you agree or disagree with the following statements?			
Agree or	Neither	Disagree or	Don't
strongly			know
agree		disagree	
65%	7%	21%	7%
0378	1 /0	2170	1 /0
700/	70/	70/	7%
1070	1 70	1 70	170
72%	14%	7%	7%
35%	29%	21%	14%
1.40/	269/	200/	21%
14%	30%	20%	Z1%
57%	21%	0%	21%
86%	7%	0%	7%
040/	4.40/	240/	400/
21%	14%	21%	43%
	e with the for Agree or strongly agree 65% 78% 72% 35% 14% 57%	e with the following statAgree or strongly agreeNeither65%7%78%7%72%14%35%29%14%36%57%21%86%7%	e with the following statements?Agree or strongly agreeNeither strongly disagreeDisagree or strongly disagree65%7%21%78%7%7%72%14%7%35%29%21%14%36%28%57%21%0%86%7%0%

 Table 5.1: Staff views on their local authority's public-facing information for private tenants

Looked at in the round, local authority online information continues to be guided more by their statutory duties in respect of private renting and homelessness than by the information likely to be sought by, and be of value to, private renters. In our opinion, the majority of local authorities

could easily improve the quality, relevance and attractiveness of their online information by making better use of resources already available within, and outside of, the council.

For instance, they could:

- Tap into the knowledge of advice agencies, letting agents and other stakeholders to better understand and re-orientate online information around the local customer journey.
- Make better use of hyperlinks to improve access to the wealth of online documentation, training videos and other resources available from other websites such as those of the Scottish Government, other local authorities, Shelter Scotland and Renting Scotland.

Provision of active information and advice services

As members of the general public, there are numerous information and advice services that private renters can access. Survey respondents and stakeholder feedback both suggested that the advice services most frequently used by private renters are local authority advice services, most commonly Housing Options services and advice shops, local council housing and/or neighbourhood offices, Citizens Advice Bureaux and Shelter Scotland's helpline and community hubs.

Other services that offer housing related information and advice include Women's Aid and energy efficiency advice centres; something highlighted by three quarters of survey respondents. Some local authorities and other stakeholders also mentioned law centres, housing aid centres (or equivalent), reflecting the fact that such services only operate in some areas of Scotland. A few stakeholders also referred to local authority private sector housing teams (or equivalent), although these do not operate across all of Scotland and discussions indicate that the numbers of such teams has reduced as a result of council funding cuts.

Housing Options

Since 2010 the Scottish Government has supported five regional hubs to embed a Housing Options approach as a key tenet of preventing homelessness. Although not a statutory function, Housing Option services are now one of the main vehicles through which local authorities deliver tailored information and advice to households to enable them to resolve their housing related problems. There is no single definition of Housing Options, but the Scottish Government says it is:

"A process which starts with housing advice when someone approaches a local authority with a housing problem. This means looking at an individual's options and choices in the widest sense. This approach features early intervention and explores all possible tenure options, including council housing, registered social landlords and the private rented sector. The advice can also cover personal circumstances which may not necessarily be housing related, such as debt advice, mediation and mental health issues"

According to Scottish Government statistics, in the year to March 2018 some 39,600 households made a Housing Options approach, of which 3,515 made two or more approaches, culminating in 43,900 approaches in total. As national statistics offer no insight into the profile of service users, our survey asked some questions. Figures provided by eight local authorities suggest that:

- Private renters accounted for 16% of households that approached a Housing Options service in the 2 years to March 2018. Applying this proportion to national figures implies that a minimum of 6,350 private renters may have accessed a Housing Options service in 2017-18.
- The proportions of service users that live in the private rented sector varied considerably from one local authority to another, with local authorities in the LAP area reporting that anywhere from 10% to 25% of those that had made a Housing Options approach were private renters.
- 43% of households that approached a Housing Options service went on to make a homeless application. This is similar to the national figure of 45% reported by the Scottish Government.
- Private renters were far more likely to make a homeless application. Over the two-year period, an average of 78% of private renters that approached a Housing Options service made a homeless application. Applying this rate to national figures suggests that, at a minimum, some 5,000 private renters that approached a Housing Options service made a homeless application.

Our estimate of 5,000 is lower than the 6,575 households that lived in self-contained or shared private rented housing that made a homeless application in 2017-18. This may be in part explained by the fact that households can make a homelessness application without first making a Housing Options approach.

The high rate of private renters that have approached a Housing Options service and then go on to make a homeless application is consistent with the widespread perception that private renters often only contact advice services when they have reached a crisis. On the other hand, there is a clear perception that Housing Options services for private renters not immediately threatened with homelessness is often 'light touch' and can fall short.

"There is an element of luck in the service received from Housing Options; it often depends on whether the person a private renter speaks to has the experience, skills, knowledge and time to sit down and provide thorough advice" (local authority)

It's really frustrating knowing that you can do so little to assist (Housing Options officer) "There is still a lot of informal gate-keeping services have so much on their plate, they simply don't have the time or resources to give the preventative advice needed by people that have hit a bump in the road" (advice provider)

"Local authority staff are sometimes only in a position to offer basic information and to signpost private renters to other advice agencies" (national representative)

The suggestion that Housing Options services are not always geared up to offer meaningful, active, casework advice to private renters, especially those not threatened with homelessness, is not necessarily one that most local authorities that participated in the survey subscribe to. Figure 5.1 illustrates the diversity of opinions surrounding the service private renters receive from Housing Options services. Some 21% of local authorities agree (or agree strongly) with the statement that 'most private renters are provided with general information only' but a further 36% disagree (or disagree strongly). Similarly, 15% agree with the statement' private renters are much less likely to be offered casework or outreach assistance than other service users' whereas 36% disagree.



Figure 5.1: Local authorities views on the Housing Options services delivered to private renters

This mix of opinions is partly attributable to variations in the structure and functions of different Housing Options teams and the availability of generic and specialist housing advice services, such as the Ayr Housing Aid Centre and the Edinburgh Housing Advice Partnership (EHAP), that private renters can be signposted or referred to⁴. Where they exist, specialist housing advice services can be well placed to provide proactive advice and support to private renters that have more complex issues and needs. Nonetheless, it is revealing that upwards of two out of five survey respondents did not express a clear opinion one way or another in terms of the nature of the service private renters receive from their local Housing Options service. This may be associated with the fact that just two local authorities report that they regularly review and report on the use of Housing Options by private renters and their impact.

The survey also asked about the types of activities provided by the Housing Options service to private renters. Amongst the 14 local authorities who answered the relevant questions:

- Virtually all take steps to ensure private renters, that use the Housing Options service, are informed about their homeless and private tenancy rights and supplied with general information about welfare benefits.
- Two thirds routinely (i.e. in 50% or more of cases) signpost or actively refer private renters to other advice providers such as Shelter Scotland and CAB.
- Half routinely seek to secure DHPs for private renters to prevent, or minimise, further rent arrears, although the proportion of applications that are successful is unknown.
- On the other hand, only a third of survey respondents report that they routinely offer private renters practical case work-based advice and support such as negotiating with landlord to

⁴ EHAP is a partnership between four charities, the Community Help & Advice Initiative (CHAI), Granton Information Centre, Four Square, Move On and Changeworks, to deliver housing advice and homelessness prevention services.
deal with issues (e.g. arrears, repairs etc), fast tracking HB claims and assistance with finding a new home.

It is therefore difficult to draw conclusions from the survey responses alone. However, when viewed alongside the high proportions of private renters that go on to make a homeless application and feedback from stakeholders, it is evident that there is scope to improve the Housing Options service offer for private renters in many local authorities. Whether the political will and resources exist to make this happen is another matter.

Overall local provision of information and advice services

Local authority respondents may be wary of expressing a clear and explicit opinion on their Housing Options service, but they are more forthcoming about the overall provision of housing related information and advice from all advice providers that operate in their local authority area. Overall:

- Upwards of 70% are confident that local information and advice services provide effective advice to private renters but just 43% are confident these services have the capacity to meet the demand from private renters.
- Only 50% are confident that referral arrangements across the local information and advice networks are effective.
- Only 50% are confident that local information and advice services have a high visible presence.
- Over 64% believe there is a lot of hidden (or unmet) demand amongst private renters for information and advice.

Staff working for local authorities with a sizeable rural population commented on specific challenges, such as the lack of internet connectivity, a patchwork of service provision and difficulties recruiting and retaining information and advice workers. We also heard that households looking for advice on how to access a suitable private lets are poorly served across much of Scotland due to the lack of services set up to do this. As a result, those new to an area, and others that lack a strong 'informal network', can struggle more than other households seeking private renters to find and access suitable good quality private lets.

One stakeholder also commented that publication of Tribunal decisions and the names of the parties involved could expose greater numbers of households to blacklisting and suggested this could drive up the need for active casework to help people secure housing.

Money and welfare information and advice

As noted in section 2, money worries, rent arrears and difficulties claiming state benefits are amongst the main reasons why private renters seek personalised information and advice. The Improvement Service (2017) monitoring of money advice services is based on data from 31 local authorities that collectively provide or fund 96 services⁵. Data for 2016-17 shows that 111,000 individuals contacted these services, of which 53% resided in the social rented sector and 15%

⁵ The Improvement Service (in conjunction with the Scottish Government and SLAB) has issued a framework for the public funding of advice. It sets out the principles that Council's should keep in mind when commissioning money advice services.

resided in the private rented sector. This equates to 16,650 private renters but this most likely includes some double counting of people that have contacted one or more services on two or more occasions. Some local advice providers report that the proportions of service users that are private renters is higher than quoted figures, ranging from 25% to 40%. This indicates that national figures mask variations in the spatial distribution of private renting and service provision across Scotland.

The online survey did not ask about private tenants' use of services that offer money and welfare advice. However, various national and local stakeholders expressed concern that private renters have reduced access, compared with social renters, to advice on income maximisation and claiming benefits.

Since 2010 council and RSL landlords have responded to rising rent arrears, and to the difficulties faced by tenants and other customers in accessing timely independent advice, by expanding their in-house welfare and money advice services and/or training frontline staff to carry out a first check on benefit entitlement, often using hand held ICT tools to assist in the process. This led one national stakeholder to suggest that the numbers of social tenants helped to claim benefits by their landlord surpasses those assisted by independent money and welfare advice services.

In contrast, private tenants typically have to rely on generic local money and welfare services. Stakeholders cautioned that these services are not always sufficiently attuned or resourced to respond swiftly and thoroughly to the needs of households living in the private rented sector. For instance, we heard that whilst landlords may issue a 'notice to quit' if a tenant has rent arrears that equal 2 months' rent or more, it can take many weeks to get an appointment for a face-to-face meeting with a money and debt or welfare benefits advisor. A couple of generic advice services also acknowledged that there are gaps in their understanding of specific issues private renters face and how to communicate and negotiate effectively with private landlords.

Housing support

"People that experience mental health issues can struggle to communicate or deal with landlords and others in authority, including council services; many really would benefit from some housing support to help meditate and liaise with their landlord to help maintain accommodation" (national representative)

Housing support for private renters generally involves floating support, also known as visiting support, whereby skilled caseworkers visit a person for an agreed number of hours a week to help them remain in their home or, in the case of people who have been homeless, to help them to settle into their new home and prevent a return to homelessness. Housing support usually offers a blend of information, advice and support activities to assist an individual to claim benefits and to guide them through the process of obtaining and managing a private tenancy and household budget. Whilst housing support usually lasts for a few months, support for individuals with complex needs can be long-term, with the level of support varying as a person's needs change.

Survey responses to questions on the tenure composition of service users suggest much lower numbers of private renters receive a housing support service than the numbers of council tenants or the numbers of homeless households that reside in temporary accommodation. In the case of RSL tenants, responses are more mixed, with almost half of local authorities suggesting the numbers of private renters and RSL tenants that receive housing support are similar and half suggesting far fewer private renters than RSL tenants receive a housing support service.

Six local authorities provided actual or estimated numbers for 2017-18. These show that these six local authorities collectively supported 2,130 people of working age in 2017-18, of which 35% were social renters, 22% were homeless and 11% were private renters. Several stakeholders suggest that one reason for the relatively low take-up of housing support by private renters is that the market operates in a way that tends to 'filter' out households with more complex needs, especially in areas where there is strong demand. Another possible reason is that, irrespective of tenure, housing support for people of working age is mainly geared towards people affected by homelessness. This was confirmed by most local authority staff and largely reflects the statutory 'housing support duty' that requires local authorities to assess, and if required, provide support to homeless applicants.

Short of scrutinising council records, there is no way to confirm what percent of private renters across the LAP area or elsewhere in Scotland have secured housing support without first submitting a homeless application or being accepted as homeless. The close link between homelessness and the provision of housing support is, however, illustrated by referral figures provided by one local authority housing support service. These show that in 2017-18, three quarters of referrals were homeless and living in B&B or temporary housing (37%) or sharing with friends/family (38%). A further 13% of referrals were RSL tenants and 12% were private tenants – 29 cases in total. Based on private rented stock figures for the area, this implies that 0.3% of private renters were referred to this council's housing support service during the year.

In terms of the activities conducted by housing support services, table 5.2 confirms that, amongst the nine local authorities that provided a positive answer, 'personal budgeting and money advice' is the most frequently delivered activity. This is followed by activities to resolve private landlord or neighbour disputes and tenancy sustainment activities. These activities are broadly consistent with the views of stakeholders on the types of support private renters most commonly require.

Local authorities generally operate a mix of directly provided, and externally commissioned, housing support services, although the balance between internal and external services varies from one local authority to another. Housing support services are usually accessed by referral, most commonly from the Housing Options service or another local authority housing service. Few independent housing support services we spoke to would consider self-referrals or referrals from RSLs, letting agents or private landlords. This is mainly due to funding and contractual arrangements as opposed to unwillingness to work with letting agents or private landlords. Indeed, independent housing support services that work with private renters, or individuals willing to take up a private let, stressed the importance of developing close working relationships with private landlords in order to source properties and to promptly resolve any issues encountered by service users or their landlord.

Table 5.2 : Types of housing support most and least frequently delivered to private renters

What types of housing support are most and least frequently delivered to private renters in your area?			
	Frequently or very frequently	Occasionally	Rarely or never
Practical support with resettlement or residential transitions (e.g. help with moving, inventory checks, etc)	56	11	33
Support with domestic and tenancy responsibilities (e.g. shopping, repair reporting, operating heating system)	67	11	22
Personal budgeting, income maximisation and debt counselling	89	11	0
Dealing with neighbour disputes and landlord problems	78	22	0
Counselling and emotional support	22	44	33
Re-connecting with community (e.g. help with work, education and social activities)	22	67	11

Some RSLs provide their own in-house housing support but these are generally aimed at enabling social tenants to maintain their tenancy. One RSL subsidiary, with a mid-market rent portfolio, however, now employs a Private Residential Tenancy Officer to assist its private tenants to sustain their tenancy and to draw on the 'assets' of the housing association to secure timely access to services that can help private tenants who got into difficulties with their rent.

Where individuals have additional needs such as mental health or addiction problems, housing, advice and support workers usually try to secure specialist input from health and social care services. However, echoing the experience of letting agents, it can be difficult to find common cause with health and social care services in spite of the integration policy agenda. Stakeholders frequently said that service fragmentation, conflicting service priorities, local authority reorganisations, staff changes and staff turnover all contribute to the difficulties of securing additional care and support for 'vulnerable' individuals. Indeed, local authority housing staff said they also frequently struggled to trigger additional care and support for homeless households with multiple needs.

One local authority has sought to achieve a more integrated approach by introducing a 'triage system' with other services. This involves 'tracking an individual from the time they move to temporary, or privately leased, accommodation, to the point they are resettled in permanent housing to ensure that, if necessary, services can move quickly to deliver any additional care and support judged necessary. Another local authority is setting up a new 'resettlement team' to offer a more 'tenure-neutral' support service, although resource constraints mean this service will be targeted at individuals assessed to have 'critical or substantial' needs. This service is therefore more likely to benefit homeless households willing to access the private rented sector rather than existing private renters that hit a difficult 'bump in the road'.

Regardless of some promising service innovation, both national and local stakeholders repeatedly stressed that funding for floating support services has been hard hit and fewer people of working age, in all tenures, now have access to support they need to remain in their home. It was also apparent from stakeholder feedback that the lack of adequately funded and joined up

services is a source of frustration for service providers, letting agents and local authority housing staff alike.

Reflecting on this, most stakeholders believed that, without more effective pathways to access services, a greater political willingness to prioritise prevention and provide more resources to enhance community services, private renters were likely to continue to struggle to access housing support prior to the point at which they applied as homeless. Some were also concerned that 'Rapid Re-Housing' plans could further concentrate scarce housing support on homeless applicants.

Measures to improve access to private renting

The online survey asked local authorities about the availability of a range of potential services that can assist lower income households to access private rental accommodation. These measures are summarised in table 5.3. Responses show that:

- Most local authorities (85%) say they operate a rent deposit guarantee scheme (RDGS) in line with the Code of Guidance on Homelessness requirement that local authorities should provide access to such schemes for homeless households and others at risk of homelessness.
- Few local authorities have developed rent bonds (15%) or rent-in-advance schemes (8%) and, where they do exist, they tend to be used only occasionally or sparingly.
- Close to half of local authorities (47%) operate some kind of private leasing scheme.
- Only three local authority respondents report there is a social letting agency operating in their area. None of these responses include the social letting agency 'Home for Good', which manages properties predominantly in the Glasgow and Ayrshire areas.

Rent Deposit Schemes or Bonds	rent deposit guarantee schemes (RDGS) provide a written guarantee to a private landlord, which is only paid out if the household leaves without giving four weeks' notice or, the property can be proven to have been damaged. Rent Deposit Bonds are similar but typically involve the payment of a cash deposit that is reclaimed by the service provider when a person moves out.
Bond Guarantee Schemes	A bond underwriting the financial risk for the landlord. Usually this is a written guarantee by a local authority, RSL or other third sector provider to pay any claims for damages (and occasionally arrears) up to a maximum specified amount.
Rent in Advance Schemes	This is a 'loan' style payment, by a local authority, RSL or other third sector organisation, towards the rent for a given period of time (usually 2-3 months) to overcome Housing Benefit payment delays, with the loan paid back once Housing Benefit has been paid out.
Private Sector Leasing	This involves a local authority, or RSL, leasing properties, acquired as long-term leases (3-10 years), from registered private landlords who are paid guaranteed rent for the period. These properties are then managed by the local authority or an RSL who usually sub-lets them to households that have been accepted as homeless or at risk of homelessness.
Social Lettings	Social lettings agencies (SLAs) are social enterprises that operate similar to high street letting agents, but cater for low income households, including those reliant on Housing Benefit or Universal Credit or experience some other disadvantage. SLAs usually charge landlords a letting fee or retain a percentage of the rent in

Table 5.3: Summary description of measures to improve access to private renting

exchange for delivering a management service. Some social letting agencies offer advice services to both landlords and tenants. Some also provide low level housing support to tenants.

Financial assistance

RDGS are viewed positively, with over three quarters of survey respondents believing they help households to secure and sustain a private tenancy. On saying that, not all landlords will accept an RDGS. Some landlords will not participate because the RDGS deposit cannot be used to offset rent arrears run up by the tenant. Some do not want to deal with the bureaucracy associated with the scheme, whilst others will only consider participating in RDGS that offer cash payments rather than written guarantees. We also heard that a number of RDGS schemes appear to have fallen by the wayside and are rarely used. This is something the Scottish Government should investigate further.

Local authority feedback suggests that the limited availability and use of Bond Guarantee or Rent in Advance Schemes is due to a combination of factors. These include a lack of resources, a lack of knowledge about how such scheme can be made to work and uncertainty about their costeffectiveness in helping private renters to secure or sustain their tenancy.

More generally, stakeholders indicated that the effectiveness of all three forms of financial assistance is influenced by the extent to which schemes incorporate additional services. Offering a telephone helpline for landlords and tenants, sourcing tenants for private landlords or providing low level housing support (such as 'settling-in' visits) were all said to boost acceptance amongst landlords and improve the housing and wellbeing outcomes of tenants. Researchers have cautioned however, that the provision of housing support associated with tenancy sustainment and resettlement may be unnecessary for most private renters on low incomes and do little other than add to the complexity and cost of managing and funding such schemes (Rugg and Rhodes, 2018).

Private sector leasing

Local authority opinions on the helpfulness or otherwise of private leasing schemes in alleviating housing need were mixed. Most local authorities we spoke to accepted that private leasing schemes can help to address homelessness and some also believed it had a role in encouraging empty and holiday homes to be brought back into residential use. However, over 60% of survey respondents said there was a shortage of privately leased properties.

The City of Edinburgh Council is actively trying to revitalise their private leasing scheme. However, at least two other local authorities have wound up, or are phasing out, their scheme. One of these local authorities cited concerns about the low value of LHA rates relative to market rents, the lack of 1-2-bedroom homes to lease and the quality of properties available to lease. A couple of stakeholders also cautioned that in localised markets where rents are below the LHA for the wider BRMA, private leasing schemes risk incentivising private landlords to withdraw from the open market, further reducing the supply for lower income households that rely of the private rental market. This may go part of the way to explain why just 30% of local authority survey respondents felt that private leasing helps people to secure or sustain a private tenancy.

Social lettings

The three local authorities that operate, or have commissioned some form of social letting agency, concurred that this was a helpful, or very helpful, vehicle for improving the accessibility and sustainability of private tenancies. This was also the case for the other couple of local authorities that were actively examining the model. Elsewhere, both survey responses and stakeholder feedback suggest that knowledge of social letting agencies remains limited in spite of the efforts of CRISIS and Shelter Scotland to raise awareness of the concept and increase understanding of how to set up and operate such schemes.

Finally, local authorities feel that the resources they have to deliver 'accessibility measures' are inadequate for the task. For instance, 54% of survey respondents said there was a shortage of funding to expand their RDGS. Likewise of those without a functioning social letting scheme, 46% said they lacked the resources to establish one, and most others were non-committal.

Other measures

CRISIS is currently investigating how to expand proviso of shared accommodation in both the social and private rented sectors. This is in response to the restriction of Housing Benefit to the LHA shared accommodation rate for single adults under the age of 35 years and the shortage of shared accommodation, which is said to be especially acute outside of Scotland's four main cites. As part of its investigations CRISIS is looking at how aspects of Scottish tenancy law, that hinder the provision of shared accommodation, might be overcome and how cultural attitudes towards shared accommodation amongst younger adults might be changed. A couple of local authorities expressed interest in this work as they are looking at the potential to expand shared accommodation.

Possibilities for improving service delivery for households in the private sector

"We need to develop our knowledge and understanding of the issues that private tenants face crisis; we need to use this to shape our housing advice and information services" (local authority)

"We need to include information & advice needs (by tenure in the HNDA & LHS frameworks" (local authority)

Local authority staff appreciate that a mix of information, advice, support and accessibility services are required to assist households to secure and sustain private tenancies (see table 5.4). Nonetheless, when asked to reflect on how their local authority could improve services for private tenants, most survey respondents prioritised improvements in the provision of information and advice services.

Local authority staff and other stakeholders that participated in the interview programme offered various suggestions on how engagement with private tenants and providers of private lettings could be improved on. Some stakeholders focused on issues outside the scope of this study, such as reviewing LHA rates but most offered various suggestions on the ways in which housing advice and support might be made more accessible and responsive to private tenants. These are summarised in table 5.5.

-						
	Essential	Important	Moderately important	Neither	Of little importance	Not important
General information (leaflets etc)	62%	23%	15%	0%	0%	0%
Information tailored to specific circumstances of a household	23%	54%	23%	0%	0%	0%
Specialised advice and/or outreach work	23%	54%	23%	0%	0%	0%
Housing support (e.g. floating support)	31%	38%	31%	0%	0%	0%
Funding support to improve PRS access	31%	46%	15%	8%	0%	0%

Table 5.4: Services required to ensure households can access and sustain a privatetenancy

Table 5.5: Suggestions for improving the advice and support offer to private tenants

Stakeholder	Suggestions
Local authorities	Establish post or team (depending on scale of PRS) to provide a single point of contact for private rented providers and tenants.
	Increase the visibility of local advice and support services that private renters can access.
	Scottish Government funded training on information and advice for private renters.
	Improve the marketing of Shelter Scotland services to raise awareness that it provides information and advice for private renters.
Letting agents	Local authorities should provide a single point of contact, similar to the Letting Agent Plus project and Shelter Scotland's role within that.
	Increase the visibility of local advice and support services that private renters can access.
	Better promote and communicate the range of advice and support services (housing options etc) to private landlords and letting agents.
Advice and housing support	Improve the level and sustainability of resources available to independent service providers.
providers	Improve referral processes to ensure people are directed (not simply signposted) to money advice and specialist advice agencies where necessary.
	Raise awareness amongst young people about the realities of the housing market as well as their rights and entitlements and services that can assist them to exercise them.
National stakeholders	Increase the volume and quality of housing related advice and support that is available to private renters.
	Ensure social housing allocation policies are better attuned to the problems private renters' experience, especially households with dependent children that have to endure living in inadequate or unaffordable accommodation for a considerable period.
	Commissioning plans and contracts should require service providers to set out how they will promote and secure 'fair access' to services by private renters.

6.SCOPE FOR IMPROVEMENT

Conclusions

The private rented sector is now home to 15% of households that reside in Scotland. As housing supply and service pressures have intensified, it has become ever more important for local authorities and partner agencies to ensure that the private rented sector is well placed to provide good quality housing that is accessible by, and sustainable for, a diverse range of households that have chosen, or have come to rely on, private renting as a longer-term housing option.

This exploratory study has sought to better understand local strategic thinking on the provision of advice and support services for private renters, the factors that shape the use and delivery of these services, and the potential to ensure these services are better placed to meet the needs of private renters. Our main focus has been on services available to private renters when they first begin to struggle to pay their rent or sustain their tenancy as opposed to the point where a homeless application is probably the only option left. The study covered a wide landscape, but the small-scale nature of the study means some issues and perspectives have inevitably been missed. Nonetheless, the evidence that has emerged enables several broad conclusions to be drawn.

Recent Scottish policy legislative developments aim to secure a fairer balance between the rights of private tenants and landlords but, for the private residential tenancy and other new measures to be effective, they must by underpinned by the provision of high-quality advice and support services. Without timely access to such services, many private tenants will continue to struggle to become informed consumers that can exercise their rights and entitlements and challenge poor standards of service received from private landlords, letting agents, the DWP and other service providers.

Evidence from this study suggests that a proportion of private tenants have more complex needs. For the majority of private tenants that "hit a bump in the road" however, rapid access to money and debt advice services, including assistance with claiming welfare benefits, is the key to tenancy sustainment. Other things being equal, private renters, and in particular single adult and couple households, have less disposable income than social tenants due to the higher share of income they have to spend on rent, fuel and other housing related costs. In spite of this, private tenants appear to be less likely to benefit from advice and support than social renters.

Information, advice and support services that are available to the public at large are not routinely communicated and marketed in ways that reach private tenants. This is compounded by the fact that private tenants do not always have prior experience of contact with agencies that could assist them to access advice and support. Moreover, whereas social landlords have responded to welfare reform by increasing the advice and support available to their tenants to manage their rent and day-to-day bills, there has been no comparable development for private renters. The net result is that private tenants can be left feeling isolated and without the wherewithal to pay their rent and other living costs, or to deal with problems with their landlord or letting agent.

Relative to social landlords, letting agents and private landlords place a higher priority on rent collection and protecting property investment and a lower priority of tenancy sustainment. Even allowing for this, the ability of letting agents and private landlords to look out for the interests of

private tenants is often hindered by their lack of knowledge about the different forms of state support that is potentially available to tenants and how this might be accessed. The is further frustrated by the 'invisibility' of advice and support services and the lack of well publicised, robust and straightforward routes that private landlords and letting agents can use to contact local authorities to find out how to go about securing advice and support for tenants.

The diverse composition and roles played by the private rented sector throughout Scotland means that solutions to the advice and support needs of private tenants are most appropriately identified and delivered at the local rather than national level. So far, few local authorities have been able to build a well evidenced and comprehensive understanding of the advice and support needs of private renters in their local area and how these can be addressed. Alongside cuts in resources to fund advice and support services, this has led to the continuation of a piecemeal response to addressing the needs of private renters in many areas.

A decade on from their introduction, many Housing Options services still appear to lack the capacity to offer a comprehensive service for private renters that are not at immediate risk of homelessness. Independent advice and support services are also struggling to meet current service demands. Of particular concern is the scarcity of housing support services for people of working age and the fact that growing numbers of housing support services are underfunded, understaffed and at risk of closure. Against this backdrop, it is little surprise that few private renters benefit from housing support services and, those that do, have typically experienced homelessness or have spent time in temporary or supported accommodation.

Faced with continuing resource constraints, local authorities and service providers have understandably looked to boost the provision of online information for private renters. Whilst this can offer a convenient and effective means of providing information, it cannot be simply assumed that all private renters have the computer literacy skills, comprehension or confidence to use this information. More could be done to enhance the quality and accessibility of online information, but we remain to be persuaded that, in the case of private renters, there is scope for further channel shifting of information and advice, away from face-to-face and phone services, towards more online services. In other words, we believe local authorities, local advice and support agencies and landlord representatives need to work together to identify what more can be done to ensure private renters can access high quality, timely and personalised telephone and face-toface advice and casework.

In the absence of comparable evidence on service performance, it is not possible to comment on the extent to which current advice and support services improve outcomes for private tenants. The study findings do, however, suggest that getting tenants' voice heard could help to raise awareness of the need to maintain a focus on private renters. More should therefore be done at the national and local level to ensure private tenants have a stronger voice in shaping policymaking and practice.

Moving forward

Resource constraints and competing priorities will potentially limit the capacity of most local authorities to carry out a fundamental review of their strategy towards private renting in the near future but there are actions that could be taken in the interim.

Good evidence on 'what works' may be lacking but local authorities like Dundee City Council have demonstrated that it is possible to make it easier for private tenants, landlords and letting agents to find appropriate information and to assist private renters to cope with periods of transition and, thus minimise the risk of homelessness. With this in mind, we would suggest that local authorities and partner agencies should take steps to:

- Ensure local strategic plans (housing, community plans, health & social care etc.) better reflect the particular advice and support needs of private tenants, with associated actions and outcomes.
- Work with private landlord and letting agent representatives to enhance understanding of the housing, advice and support needs of private tenants and to devise an action plan to improve the visibility of, and access to, services.
- Ensure housing options and other digital information is up-to-date and orientated around the customer journey from searching for, to securing and sustaining, a private tenancy.
- Assess the potential to 'trial' a single point of contact that is staffed by people with the skills and expertise to assist private landlords and letting agents to link in with appropriate local services and improve referral routes and access to advice and support services, for private tenants.
- Ensure that specialist advice services are available for private tenants with more complex issues including those from minority communities and named organisations, including private landlords and letting agents, can refer appropriate individuals to these services

In addition, we believe local authorities may find it useful to:

- Work with neighbouring local authorities and landlord representatives to run forums and training sessions for private landlords and letting agents on good practice in relation to tenancy sustainment, arrears management and welfare advice.
- Clarify referral arrangement and ensure that, where applicable, private renters with any rent arrears are fast tracked from Housing Options (and other housing services) to services that can deliver appropriate money and debt advice.
- Actively engage and communicate regularly with private and social letting agents who are in a position to share information about various matters with private landlords and tenants.

National policy development and research

Available evidence suggests current arrangements are not always sufficient to prevent homelessness amongst private renters that experience a difficult period of transition or a sudden change in their personal circumstances. This suggests that the Scottish Government should:

- Consider what more could be done to ensure the necessary political leadership and resources are available to secure a higher priority for upstream measures to prevent homelessness throughout Scotland.
- Ensure the needs of private renters are more explicitly considered in policies to tackle different forms of poverty as well as the work of the Scottish Commission on Social Security.

The Scottish Government should also work in partnership with representatives from the local authority, private rented and housing advice and support sectors to:

- Revise Local Housing Strategy and Community Planning guidance to strengthen the links between Housing Options and other advice and support approaches at local level.
- Carry out research to strengthen understanding of the advice and support needs of different groups of private tenants and the most suitable channels for delivering services. This should include the advice and support needs of single adult and couple households that have incomes just above the threshold for Housing Benefit and Universal Credit entitlement, who are a very poorly understood group.
- Consider the setting up of a national network to share emerging practice in relation to improving advice and support to private renters, including the development of social letting agencies.
- Weight up the merits of using Section 11 notices, which private landlords submit to local authorities if they are seeking to evict a tenant, to inform local strategy processes and to trigger engagement between a local authority and the landlord/letting agent to review suitable options to prevent eviction and a subsequent homeless application.

Finally, if nothing else, we hope this report stimulates wider discussion around the advice and support needs of private tenants, encourages the sharing of knowledge between local authorities and other stakeholders on ways to improve advice and support for private renters and leads to further research to explore the issues we have raised in greater depth.

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APPENDIX 1: DEFINITION OF HOUSING SUPPORT

The Housing (Scotland) Act 2001 (Housing Support Services) Regulations 2002 defines housing support in the form of 21 actions, which are summarised below.

1. General counselling and support including befriending, advising on food preparation, reminding and nonspecialist counselling where this does not overlap with similar services provided as personal care or personal support.

2. Assisting with the security of the dwelling required because of the needs of the service user.

- 3. Assisting with the maintenance of the safety of the dwelling.
- 4. Advising and supervising service users on the use of domestic equipment and appliances.

5. Assisting with arranging minor repairs to and servicing of a service user's own domestic equipment and appliances.

6. Providing life skills training in maintaining the dwelling and curtilage in appropriate condition.

7. Assisting the service user to engage with individuals, professionals and other bodies with an interest in the welfare of the service user.

8. Arranging adaptations to enable the service user to cope with disability.

9. Advising or assisting the service user with personal budgeting and debt counselling.

10. Advising or assisting the service user in dealing with relationships and disputes with neighbours.

11. Advising or assisting the service user in dealing with benefit claims and other official correspondence relevant to sustaining occupancy of the dwelling.

12. Advising or assisting with resettlement of the service user.

13. Advising or assisting the service user to enable him or her to move on to accommodation where less intense support is required.

14. Assisting with shopping and errands where this does not overlap with similar services provided as personal care or personal support.

15. Providing and maintaining emergency alarm and call systems in accommodation designed or adapted for and occupied by elderly, sick or disabled people.

16. Responding to emergency alarm calls, where such calls relate to any of the housing support services prescribed in other paragraphs of this Schedule, in accommodation designed or adapted for and occupied by elderly, sick or disabled people.

17. Controlling access to individual service users' rooms.

18. Cleaning of service users' own rooms and windows.

19. Providing for the costs of resettlement services.

20. Encouraging social intercourse and welfare checks for residents of accommodation supported by either a resident warden or a non-resident warden with a system for calling that warden where this does not overlap with similar services provided as personal care or personal support.

21. Arranging social events for residents of accommodation supported by either a resident warden or a non-resident warden with a system for calling that warden.

APPENDIX 2: LISTS OF ORGANISATIONS WITH SNSIAP ACCREDITATION AT 19 DEC 2017

Following the introduction of the new SLAB accreditation process, the Scottish Government agreed that agencies old accreditation should be rolled on until they service providers had reasonable time to respond to the new process and then re-apply for re-accreditation. All the names listed below are understood to have applied for re-accreditation and/or are working towards it.

Type of advice: H = Housing only M = Money only B = Benefits only HM = Housing and money HB = Housing and benefits MB = Money and benefits HMB = Housing, money and benefits

Provider	Type of Advice	Accredited To
Local Authority		
Dundee City Council - Homeless Services Unit	Н	Sept-2017
Dundee City Council - Energy Efficiency Advice Project	В	Feb-2014
Dundee City Council - Welfare Rights Unit	MB	Aug-2014
East Renfrewshire Council - Housing Information & Advice Service	Н	
East Renfrewshire Council - Money Advice Team	М	May 2014
East Renfrewshire Council - Welfare Rights Unit	В	May-2014
Fife Council - Local Services Network (Dunfermline)	Н	Nov-2014
Fife Council - Local Services Network (Glenrothes)	Н	Jul-2014
Fife Council - Local Services Network (Levenmouth) (incorporates Leven and Methil and Buckhaven sites)	Н	Mar-2015
Fife Council - Local Services Network (North East Fife) (incorporates Cupar and St Andrews sites)	Н	Jul-2015
Fife Council - Local Services Network (South West Fife)	Н	Mar-2014
Highland Council - Income Maximisation & Money Advice Team	MB	Apr-2014
Inverclyde Council - Welfare Rights Unit	В	Aug-2014
Moray Council - Housing Needs	Н	Dec-2017
Moray Council - Financial Inclusion Service	MB	Jun-2021
North Ayrshire Council Homeless Assessment Prevention and Advice Team	Н	Mar-2016
North Lanarkshire Council - Debt Advice Services	М	Apr-2014
North Lanarkshire Council - Financial Inclusion Team	MB	Dec-2017
Orkney Islands Council - Housing services	Н	Dec-2021
Perth & Kinross Council - Welfare Rights Team	В	Oct-2021
South Ayrshire Council - Housing Options Team	Н	May-2014
Stirling Council – Money Advice Team	MB	Jun-2014
West Lothian Council - Advice Shop and Corporate Debt Team	HMB	Nov-2021
West Lothian Council - Housing Needs Service	Н	Mar-2014
Law Centre		
Castlemilk Law and Money Advice Centre	HMB	Oct-2021
Govan Law Centre	Н	Nov-2015
Legal Services Agency	HMB	Oct-2017
Housing Associations		
Albyn Housing Association	Н	Mar-2014
Angus Housing Association	Н	Mar-2015
Castle Rock Edinvar Housing Association	В	Nov-2015
Cordale Housing Association	Н	Mar-2015
Craigdale Housing Association	Н	Jan-2015

Curringhama Hausing Association Ltd		Apr 2021
Cunninghame Housing Association Ltd	H HM	Apr-2021 Feb-2015
Drumchapel Housing Co-operative		
East Lothian	H	Apr-2016
Easthall Park Housing Co-operative	H	Nov-2015
Forth Housing Association	H	June-2020
Gardeen Housing Association	H	Apr-2021
Glasgow Housing Association	H	Dec-2015
Hillcrest Housing Association - Making Money Work Team	MB	May-2014
Hillcrest Housing Association - Pre-Tenancy Services	HMB	May-2014
Hillhead Housing Association 2000	В	Dec-2021
Link Housing Advice Service	MB	Sep-2021
Link Housing Association - Money & Welfare Rights Team	В	Nov-2017
Lochaber Housing Association	H	Oct-2015
Melville Housing Association	В	Aug-2021
Melville Housing Association - Welfare Rights Team	В	Nov-2017
NG Homes	Н	Jul-2021
North Glasgow Housing Association	HMB	Dec-2014
Orkney Housing Association	Н	June-2020
Paragon Housing Association	HMB	Feb-2015
Pentland Housing Association	Н	Jul-2021
Provanhall Housing Association	HMB	Sep-2021
Citizens Advice Bureau		
Citizens Advice Bureau (Aberdeen)	Н	Feb-2016
Citizens Advice Bureau (Aberdeen)	MB	Apr-2014
Citizens Advice Bureau (Airdrie)	НМВ	Nov-2017
Citizens Advice Bureau (Angus) (incorporates Arbroath, Forfar and	НМВ	Mar-2014
Montrose		
Citizens Advice Bureau (Argyll and Bute)	НМВ	Jan-2014
Citizens Advice Bureau (Caithness)	НМВ	Oct-2021
Citizens Advice Bureau (Clackmannanshire)	HMB	Aug-2014
Citizens Advice Bureau (Clydesdale)	Μ	Jan-2015
Citizens Advice Bureau (Coatbridge)	MB	Jan-2015
Citizens Advice Bureau (Denny & Dunipace)	HMB	July-2014
Citizens Advice Bureau (Dundee)	MB	June-2014
Citizens Advice Bureau (East Ayrshire) (incorporates Cumnock and	MB	Mar-2015
Kilmarnock	NID.	
Citizens Advice Bureau East Dunbartonshire	НМВ	May 2016
Citizens Advice Bureau (East Renfrewshire)	HMB	May-2016
Citizens Advice Bureau (East Sutherland)	HMB	Mar-2015
Citizens Advice Bureau (Falkirk)	MB	Sept-2014
Citizens Advice Bureau (Glasgow Bridgeton)	HMB	Aug-2014
Citizens Advice Bureau (Glasgow Drumchapel)	HMB	June-2014
Citizens Advice Bureau (Glasgow Ersterhouse)	HMB	Jan-2014
Citizens Advice Bureau (Glasgow Greater Pollock)	HMB	Nov-2017
Citizens Advice Bureau (Glasgow Breater Poliock)	HMB	May-2014
Citizens Advice Bureau (Grangemouth & Bo'ness)	HMB	July-2014
	HMB	
Citizens Advice Bureau (Haddington)		Mar-2015
Citizens Advice Bureau (Hamilton)	HMB	Mar-2015
Citizens Advice Bureau (Inverness Badenock & Strathspey)	HMB	June-2014
Citizens Advice Bureau Lochaber	HMB	May-2016
Citizens Advice Bureau (Motherwell & Wishaw)	HMB	Nov-2017
Citizens Advice Bureau (Nairn)	HMB	Sept-2021
Citizens Advice Bureau (North Ayrshire) (incorporates Arran, Irvine,	HMB	May-2014
Kilbirnie, Largs and Saltcoats CABx)		A
Citizens Advice Bureau (Orkney)	HB	Aug-2014
Citizens Advice Bureau (Perth)	HMB	May-2014
Citizens Advice Bureau (Ross & Cromarty)	HMB	June-2014

Citizens Advice Bureau (Rutherglen & Cambuslang)	MB	Mar-2015
Citizens Advice Bureau (Shetland Islands)	HMB	Dec-2017
Citizens Advice Bureau (Skye & Lochalsh)	HMB	May-2021
Citizens Advice Bureau (Stirling)	HMB	Mar-2014
Citizens Advice Bureau (West Lothian)	HMB	Sep-2021
Citizens Advice Bureau (Western Isles) (Incorporates Barra, Harris,	HMB	Oct-2021
Lewis and Uist		001-2021
Citizens Advice Direct	НМВ	Oct-2017
Dumfries and Galloway Citizens Advice Service	MB	May-2021
Citizens Advice & Rights Fife (CARF) (Incorporates Cowdenbeath,	MB	Mar-2021
	IVIB	Mar-2021
Cupar, Dunfermline, Glenrothes and Kirkcaldy CABx) Shelter		
		Apr. 2014
Shelter Housing Law Service and Shelter Housing Aid Centre (Dundee)	Н	Apr -2014
Shelter Housing Law Service and Shelter Housing Aid Centre (Edinburgh)	Н	Apr - 2014
Shelter Housing Law Service and Shelter Housing Aid Centre	Н	Apr- 2014
(Glasgow)		
Other Third Sector		
Ayr Housing Aid Centre	Н	Sep-2021
Brooksbank Centre Money Advice Service	MB M	Apr-2014
Changeworks Affordable Warmth Team	MB	June-2020
Community Help & Advice Initiative (CHAI)	HMB	Sep-2021
Community Housing Advocacy Project (CHAP)	НМ	Mar-2015 May
		2014
Disabled Persons Housing Service (Fife)	Н	Apr-2014
Dundee Carers Centre	В	July-2014
Dunedin Harbour Hostel	Н	Apr-2014
FAIR Ltd (Family Advice & Information Resource)	MB	Sep-2021
Fife Women's Aid Women's Support Service	Н	May-2016
Frontline Fife Housing & Homelessness Service	Н	Apr-2014
Frontline Fife Housing Advice Service	Н	May-2014
Gardeen Housing Association	HB	Apr-2021
Granton Information Centre	НМВ	July-2014
Grapevine Disability Information and Advice	В	June-2020
Greater Easterhouse Money Advice Project	MB	Aug-2014
Money Matters Money Advice Centre	MB	Sept-2014
Move On	MB	Sept-2015
Orkney Islands Property Development	Н	
Rowan Alba (Stramullion Project)	HMB	Apr-2014
Scottish Helpline for Older People (SHOP)	HM	July-2014
VSA Carers Centre - Welfare Rights Service	B	Apr-2014
The Action Group	MB	Jan-2022
		Jan-2022

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