

WELFARE REFORM COMMITTEE
THE FUTURE DELIVERY OF SOCIAL SECURITY IN SCOTLAND
WRITTEN SUBMISSION RECEIVED FROM HORIZON HOUSING ASSOCIATION
AND BLACKWOOD HOMES & CARE

Submission endorsed by:

- Capability Scotland
- Glasgow Centre for Inclusive Living
- Inclusion Scotland
- Independent Living in Scotland

1 Introduction

1.1 Horizon and Blackwood Housing Associations have come together to make a joint submission to the Welfare Reform Committee's call for evidence in relation to the future of social security in Scotland. We welcome the Welfare Reform Committee's invitation to make practical suggestions for improvement or change to elements of the welfare system using the powers proposed under the Smith Agreement.

1.2 We are independent RSLs, together providing around 2400 homes across 31 of the 32 local authority areas in Scotland. We specialise in providing some 2400 accessible and affordable homes across Scotland which integrate housing for disabled people. Our housing related services include adaptations to our properties which enable disabled people and their families to live independent lives in ordinary home in inclusive communities.

1.3 Our tenants and other customers are affected by almost all of the welfare benefits on which the Committee calls for evidence. We are however uniquely well placed to provide evidence on one of the changes needed to the housing element of Universal Credit and/or Discretionary Housing Payments and have therefore limited our evidence to this.

2 Universal Credit (housing element and administrative arrangements) and Discretionary Housing Payments

2.1 Service charges for maintaining and servicing property adaptations have been explicitly excluded from Universal Credit's list of eligible service charges. These charges are currently eligible under the Housing Benefit system but have been excluded from Universal Credit, on the grounds that other systems are designed to pay for these. The DWP has however been unable to advise which other systems

are designed to pay for a landlord's costs. These costs have hitherto been eligible for Housing Benefit and have not been met from any other source than tenant's incomes. The tenants' ability to occupy the property is dependent on their ability to pay the charges necessary to ensure the maintenance and upkeep of the fixtures and fittings.

2.2 Service charges support the costs of maintaining and servicing property adaptations such as clos-o-mat toilets (washer/dryer toilets); specialist baths; automatic door systems; through floor lifts, ceiling track systems and stair track systems. These are items in the property essential to the tenant's (or member of the tenant's family) ability to live at home and to make use of property components essential for inhabiting the property. In some cases these are additional to standard components, and in others they are replacements for standard components which require more costly servicing and maintenance.

2.3 Landlords cover costs for maintaining and servicing adaptations in different ways – some include in rent calculations, others levy service charges. No matter the approach, these are indisputably housing costs. In the spirit of embedding principles of equality and common sense in the system, we would urge that Universal Credit's housing elements be amended by the Scottish Parliament to reflect this.

2.4 From our knowledge of the approach taken by Scottish landlords to date, we would submit that the cost of such an adjustment is marginal to the social security system, but significant to the individual benefit claimant and to those landlords which serve greater proportions of disabled and older people. For Horizon and Blackwood affected tenants, the omission of service charges from Universal Credit eligibility will affect around 682 households who currently receive housing benefit. The total value of the service charges currently eligible for housing benefit is in the region of £160,155 per annum. Individuals would lose between £7 and £26 per week depending on the type and number of installed adaptations. Added to other cuts in benefits and services being experienced by these groups, the impact of this change will increase debt and homelessness.

2.5 In the event that the Universal Credit eligibility cannot be amended under devolved powers, we would urge that the provisions for Discretionary Housing Payments in Scotland be improved clearly to state that these can be used to support ancillary housing costs for disabled people.

2.6 The Committee has also sought views on the integration of Scottish devolved benefits with existing devolved powers and any unintended consequences of changes. In this context, it is perhaps worth pointing out that although responsibility for property adaptations is a delegated function under the Public Bodies (Joint Working) (Scotland) Act 2014, the associated guidance has **excluded** adaptations in social rented properties. There is therefore no current mechanism for addressing the impact of the Universal Credit eligibility restrictions through health and social care

integration, yet it is on health and social care budgets that the impact will – in the short, medium and longer term – be felt.

3 Conclusion

3.1 This aspect of Universal Credit has perhaps received little attention from the housing sector as it affects relatively few people: i.e. tenants of specialist landlords, such as Horizon and Blackwood, with proportionately greater numbers of adapted housing designed to enable independent living, and not integrated with support provision. The Welfare Reform Committee's recommendation on a change and improvement to this housing element of Universal Credit will support principles of equality, human rights and common sense.

3.2 If it would be helpful, we would be pleased to provide further evidence and case study examples to support the Committee's consideration of this submission.