

17 May 2024

Submitted via email to:  
[localgov.committee@parliament.scot](mailto:localgov.committee@parliament.scot)

# Housing (Scotland) Bill: Call for Views

## About us

Consumer Scotland is the statutory body for consumers in Scotland. Established by the Consumer Scotland Act 2020, we are accountable to the Scottish Parliament. The Act defines consumers as individuals and small businesses that purchase, use or receive in Scotland goods or services supplied by a business, profession, not for profit enterprise, or public body.

Our purpose is to improve outcomes for current and future consumers, and our strategic objectives are:

- to enhance understanding and awareness of consumer issues by strengthening the evidence base
- to serve the needs and aspirations of current and future consumers by inspiring and influencing the public, private and third sectors
- to enable the active participation of consumers in a fairer economy by improving access to information and support

Consumer Scotland uses data, research and analysis to inform our work on the key issues facing consumers in Scotland. In conjunction with that evidence base we seek a consumer perspective through the application of the consumer principles of access, choice, safety, information, fairness, representation, sustainability and redress.

## Consumer principles

The Consumer Principles are a set of principles developed by consumer organisations in the UK and overseas.

Consumer Scotland uses the Consumer Principles as a framework through which to analyse the evidence on markets and related issues from a consumer perspective.

The Consumer Principles are:

- Access: Can people get the goods or services they need or want?
- Choice: Is there any?
- Safety: Are the goods or services dangerous to health or welfare?
- Information: Is it available, accurate and useful?
- Fairness: Are some or all consumers unfairly discriminated against?
- Representation: Do consumers have a say in how goods or services are provided?
- Redress: If things go wrong, is there a system for making things right?
- Sustainability: Are consumers enabled to make sustainable choices?

We refer to these principles throughout our response.

## Our response

The focus of our response is the interest of households in Scotland as consumers of social and private rented sector tenancies. We have not responded to all questions in this consultation and have focussed on the questions most relevant to our role.

### Summary

- Consumers need access to reliable and affordable tenancies in well maintained homes. They should also be able to understand and exercise their rights when confronted with undue rent increases and or poor practices from landlords or letting agents. While we consider that some elements of the Bill will improve tenants' rights, it remains largely unclear how and to what extent its provisions will improve outcomes for tenants and service users overall.
- The Housing Bill is only part of a wider range of housing policy measures which are necessary to ensure that both private and social rent tenants can access tenancies and exercise their rights, enjoying affordable, safe, and well maintained homes.

Proposals aimed at making rent levels more affordable must be paired with measures to increase housing supply, in order to minimise the risks of perverse impacts of rent control measures.

- Whether these proposals result in better outcomes for tenants as consumers also depends on the interplay between housing and strategies in other policy areas including net zero, planning, and economic growth. The combined impact of these measures is, as yet, not fully understood. We encourage consideration of such linkages both in this and other policy proposals, for example regarding decarbonisation requirements in buildings. Joined-up thinking across policy areas is essential to help minimise unintended consequences of measures.
- We consider that the only way to meet the needs of tenants and improve consumer outcomes is through a holistic approach, with well-defined strategic objectives and realistic and efficient pathways for delivery, with duties clearly assigned to those best placed to undertake them.

## General

### Question 1. To what extent do you agree that the measures in the Bill meet the Scottish Government's stated policy objectives?

The stated policy objectives of the Bill are:

- To progress reforms aimed at ensuring people have a safe, secure, and affordable place to live.
- To deliver the Scottish Government's 'New Deal for Tenants' and some aspects of 'Housing to 2040', while contributing to the ambition to end homelessness in Scotland.

There are several key points we wish to highlight concerning the Bill and the Scottish Government's policy and approach to housing in general.

### **Addressing the lack of supply**

There has been a shift from social rent to private rented tenancies over the last six decades. Throughout the 1960s and 70s, over half of Scotland's population lived in socially rented accommodation. Over time this figure has declined to around a fifth across the 2010s.<sup>1</sup> This has coincided with growth in the Private Rented Sector ("PRS"), with the number of people living in PRS properties doubling in the last 20 years from about 6% of the population to around 12%. Zoopla data from 2022 suggested that demand for rental properties was increasing, while the number of homes for rent was 38% lower than average over the previous five years. Estate agencies reported getting 46% more enquiries about rental homes than they would have expected, based on previous enquiry levels, over this same five-year timeframe.<sup>2</sup>

On 15 May, the Scottish Parliament passed a motion declaring Scotland to be in a housing emergency, calling on the Scottish Ministers to *“bring forward an urgent housing emergency action plan to tackle the issues raised by the Scottish Government’s own expert Homelessness Prevention Task and Finish Group, including actions that will reduce the number of children stuck in temporary accommodation by the end of this parliamentary session.”*<sup>3</sup>

The motion also *“recognises the need to improve capacity in local government to prevent more local homelessness services falling into systemic failure, and the need to improve delivery for those with specific supported living needs, and calls on the Scottish Ministers to review how national government, local authorities and third sector partners are working together on the shared ambition to end homelessness.”*

The Scottish Government - working closely with stakeholders from across the housing and third sector – should take forward the development of a housing emergency action plan, with a view to improving local government capacity and reviewing partnership working. We encourage Committee Members and other MSPs to consider to what extent the Housing Bill provides scope to integrate some of the measures that might result from a housing emergency action plan, as it progresses through Parliament. The Bill may serve to implement some of these measures and should not be seen in isolation from wider plans.

The Scottish Government has committed to deliver 110,000 new affordable homes by 2032, of which at least 70% will be available for social rent and 10% will be in remote, rural and island communities.<sup>4</sup> However, the number of approvals and new starts for homes over 2022/23 were 6,396<sup>5</sup> and 6,990<sup>6</sup>, indicating that the number of current completions is lower than those needed to meet this target.

In financial year 2023/24, the Scottish Government allocated £752 million to the Affordable Housing Supply Programme (“AHSP”). This included £60 million to support councils and Registered Social Landlords (“RSLs”) to purchase properties including empty homes and private sector homes.<sup>7</sup> In the year 2024/25, the Scottish Government allocated £556 million to the AHSP, which is a £196 million reduction (£205 million in real terms).<sup>8</sup> In the light of this cut to the budget, and the continued demand for affordable housing, there is a need for clarity on how the Scottish Government will meet its objectives of ensuring that consumers have access to safe, affordable and secure housing with the funding that is available this year.

We welcome the recent allocation of £80 million funding to help local authorities acquire properties and bring them into use as affordable housing through the National Acquisition Programme.<sup>9</sup> To understand the impact of this, it would be helpful to have a breakdown of how funding for the programme was spent last year, and an evaluation of the effectiveness of this spend. As this amount is spread out over two years, the scale and duration of this spend may be insufficient to offset the impacts of the cut to the AHSP.

- There is a need for clarity on how the Scottish Government will meet its target of increasing affordable rental stock, to meet the objectives of the Bill, given budgetary pressures.
- For the Bill to be effective in achieving outcomes, close consultation with local authorities and other relevant bodies should continue, to ensure that housing needs across the country are fully understood and that policies are based on robust, up to date evidence.

### **Housing affordability**

Scottish Government research has found that tenants are struggling to pay rents.<sup>10</sup> Evidence suggests that over half of private renters in the UK (53%) struggled to meet housing costs in 2022, and that one in ten (10%) private renters were behind on housing costs in 2023.<sup>11 12</sup> Consumer Scotland analysis published in February 2024 found that housing costs make up a larger percentage of expenditure amongst households with lower incomes, and lower income households continue to be disproportionately affected by inflation.<sup>13</sup>

- We would welcome more detail on what additional measures the Scottish Government will take to ensure that consumers in Scotland can access affordable housing. PRS rent levels in the UK have risen to historic highs<sup>14</sup> and while the Bill contains welcome measures to potentially limit the scale of future rent increases, this must be seen in the context of the existing challenges tenants face in accessing affordable, high quality housing.

### **Empowering tenants**

Tenants have little ability to influence rent levels and we recognise the potential power imbalance in the relationship between those who own a property and those who pay to use it.

When it comes to the consumer principles of representation, information, and redress, the Bill does not currently address how consumers can play a more active role in decisions about their housing. For example, how tenants will be informed about a proposal that their area be subject to rent controls, how they can participate in the consultation process, and what their options are if they believe their area should be subject to proposed controls, but is not. More detail is needed on the mechanisms for ensuring consumers have information and can fully and freely participate in the measures set up under the Bill.

More insight is required into tenants' experiences through analysis of existing data and commissioning of research. This would inform the development of policies and measures to improve existing systems. The process for raising issues has to be accessible, simple, and it has to protect tenants from any repercussions as a result of them raising issues.

In the Draft Rented Sector Strategy published in December 2021, the Scottish Government committed to establishing a new PRS housing regulator by 2025, to improve new housing standards and the quality of service PRS tenants receive. However, the Bill does not contain

any such proposal. In the Social Rented Sector (“SRS”), the Scottish Housing Regulator was established to safeguard the interests of tenants and users through the Housing (Scotland) Act 2010. PRS tenants however remain reliant on the First-Tier Tribunal for Scotland (Housing and Property Chamber) (“the FTT”). In line with the consumer principle of fairness, Consumer Scotland has concerns that the lack of PRS regulation may put PRS tenants at risk of having less protection than those in the SRS. We would encourage further consideration of whether more regulatory reforms are needed in the PRS, based on robust evidence including stakeholder consultation.

In assessing the effectiveness of the current protections offered by access to the FTT, we note that Consumer Scotland research has found that overall, a third (37%) of adults in Scotland have low levels of legal confidence, meaning they are not confident they can achieve good outcomes across a range of common legal scenarios. In addition, 24% of adults perceive the justice system in Scotland as being not very accessible.<sup>15</sup> Research by the Legal Services Board in England and Wales found that anyone using legal services can be considered inherently vulnerable, primarily due to the situation that prompts their legal need, but also due to the way the legal services market works.<sup>16</sup> Independent Age has also reported that 20% of older tenants consider they know nothing about their housing rights.<sup>17</sup> Being faced with potentially large rent increases or eviction may exacerbate existing consumer vulnerabilities.

- Consumers must have access to information about their rights and support must be in place to assist those who may need help to exercise their rights effectively.
- More insight is needed into consumer experiences of using the FTT system to enforce their PRS rights, to assist consideration of the effectiveness of this and allow assessment of whether further regulatory reforms are needed in the PRS sector.

### **The need for effective data, monitoring, and cumulative impact assessment**

Many of the measures proposed in the Bill are commendable in principle. However, their success in practice depends upon effective delivery and implementation. The Bill would benefit from more clarity on how proposals will work in practice to ensure improved outcomes for tenants and those who are homeless. Effective implementation will also require that local authorities and other service providers are given sufficient resources to fulfil new responsibilities.

Reliable data will be needed to monitor the impact of measures, along with effective evaluation to help mitigate potential unintended consequences. While the Housing to 2040 strategy contains commitments to put in place mechanisms to collect robust data on the Scottish PRS, and the New Deal mentions use of the Landlords Register in this context,<sup>18</sup> no detail regarding this appears in the Bill’s proposals.

We are concerned that there is a lack of understanding of the interplay between proposed requirements in the Housing Bill, other impending legislation, and the wider housing market. In our response to the consultation on Social Housing Net Zero Standards, we encouraged

the Scottish Government to assess the impact of the new standard on social housing providers and tenants before proposals are finalised, in order to avoid any unintended detriment.<sup>19</sup> We have concerns that some proposals may result in fewer affordable homes being available for social rent. We have also called for assessment of the impact of proposed energy efficiency standards in the PRS on the wider housing market.<sup>20</sup> Furthermore, there may be impacts on the market caused by proposed design standards for all new build housing, along with reforms to short term letting arrangements.<sup>21</sup> All these measures may impact on the housing market and we need to understand the cumulative impact of these.

The Scottish Government has also proposed a Human Rights Bill, which will place duties on local authorities and housing associations (as public authorities responsible for upholding economic, social and cultural rights). While we welcome additional consideration of the rights to housing and food, these different statutory requirements must be effectively aligned.<sup>22</sup>

- We support many of the individual measures in the Bill, but it is important not to view these in isolation from other measures affecting the housing market. There is a need to assess the cumulative impact of these measures and understand the effects. High quality data and effective evaluation will assist effective implementation of the measures.

### **Consumer Duty**

We are disappointed not to see reference to the Consumer Duty in those parts of the Bill that refer to strategic decision-making by public authorities, including local authorities, health and social care partnerships (integration joint boards), and the Scottish Housing Regulator.

With the introduction of the Consumer Duty in the Consumer Scotland Act 2020,<sup>23</sup> designated public authorities<sup>24</sup> must now have regard to a) the impact of those decisions on consumers in Scotland; and b) the desirability of reducing harm to consumers in Scotland.

Consumer Scotland has recently published draft guidance, including an impact assessment, to help the relevant public authorities meet the Consumer Duty. Following a public consultation, we will finalise the guidance in time for the duty's year-long implementation period ending on 31 March 2025.<sup>25</sup> Scottish Ministers are subject to the duty and while it will not be fully implemented until 1 April 2025, the Bill would provide an opportunity for the Scottish Government to demonstrate leadership by showing its own commitment to the duty.

- We would welcome a Consumer Duty Impact Assessment being carried out for this Bill to ensure the impact on consumers in Scotland is considered.

## Rent

### Question 3. Do you support the proposals in Part 1 of the Bill allowing rent control areas to be designated?

Data based mainly on advertised rental prices suggests that since 2022, rents in Scotland have increased sharply.<sup>26</sup> Recent increases in rents are related to a combination of rapid income growth combined with the increase in interest rates<sup>27</sup> which in the short term can both increase demand for PRS tenancies and reduce supply.

Rent levels are determined by an extremely complex mix of factors. While the balance of supply and demand is important, this is in turn influenced by macro factors such as the availability and the cost of credit, broader taxation, and regulatory factors which can influence supply. Political and economic insecurity can act as a deterrent for landlords to stay or remain in the market. It can also impact on investors in their decisions on whether, where and how many properties to build – and how many of them would be considered affordable.

However, the effectiveness of rent caps in mitigating rent increases is uncertain, and likely to hinge, critically on the design details.<sup>28</sup> Depending on the design of rent cap policies, and wider market and regulatory factors, rent cap areas might enhance housing affordability. But they could also, by influencing spatial distribution of demand and supply, have limited effects; or could even have adverse effects if they disincentivise supply. The lack of detail on many elements of the proposed RCAs (including the level of the caps) at this stage makes it difficult to assess the likely impact of the Bill proposals on housing affordability.

Given these uncertainties, robust monitoring and evaluation of the impacts of any RCAs that are established will be crucial, in order to understand how RCAs, and the specifics of their design, are influencing affordability and accessibility of PRS accommodation both within and adjacent to RCAs that are established. The proposals in the Bill would benefit from further research, modelling, or pilot schemes exploring the potential responses of various groups of tenants to the implementation of RCAs or the exemption of certain property types, to allow consideration of the impacts on rental markets.

Unlike Rent Pressure Zones, RCAs may designate “*all or any part*” of a local authority area as an RCA. It is unclear how granular assessment will be, and what impact the designation of one area would have on rent levels in similar or adjacent geographical areas. Increased duties may place more burden on public services which are already under pressure; and there may be a risk of weakening of tenants’ rights following impending conversion of older tenancies to Private Residential Tenancies. There may be further knock-on effects of exempting, for example, Purpose Built Student Accommodation, as well as impacts on the safety of tenants experiencing domestic abuse.

Reliable and comparable rental price data, on actual rather than advertised rents, at a local level, will be required to assess the need for an RCA, and to robustly monitor and regularly evaluate their impact after implementation. The need for an accurate and up to date register



of properties and their landlords to allow monitoring of the PRS was recognised in the New Deal for Tenants.<sup>29</sup> We support the accompanying suggestion that this should be recorded in the Scottish Landlord Register, and encourage the Scottish Government to explore this as part of the proposed set of measures.

In order that local authority proposals for RCAs are based on robust and consistent evidence, a duty rather than a power should be placed upon Scottish Ministers to issue detailed guidance on reporting requirements to local authorities, as currently permitted by section 7 of the Bill. In principle, we think that RCAs could be an important element of a wider suite of policy measures to improve affordability, and meet the stated aims of *“making rents more affordable and ensuring tenants are less likely to be ‘priced out’ of housing due to rent increases”*.<sup>30</sup> However, we consider that RCAs are unlikely to contribute to substantially lower rents, if not paired with supporting interventions to maintain and enhance supply, both in the PRS and other tenure types.<sup>31</sup>

- It is important that these measures are detailed and usable in practice for tenants. In line with the consumer principles of choice and information, it will be critically important that tenants have information about the operation of rent control policies that apply in their area, what the rules and their rights are, and how long they will be in place for. It will also be important for tenants to know what their redress mechanisms are, if they feel that the rent increases proposed are not in accordance with the conditions of the RCA.
- In line with the consumer principle of representation, we would welcome consideration of further measures encouraging meaningful participation by tenants in any RCA process. The Bill as drafted may reduce input from tenants groups if they are not locally organised and further consideration should be given to how this will work in practice.
- While Consumer Scotland supports in principle the potential use of RCAs as a tool to enhance rental affordability, the lack of detail in the proposals makes it difficult to assess their likely impact. The establishment of any RCA must be accompanied with robust monitoring and evaluation of the RCAs impact on the accessibility and affordability of PRS property.

## Evictions

### Question 5. What are your views on Part 2 of the Bill that deals with evictions?

PRS landlords must make their applications for eviction and possession of the property to the FTT.<sup>32</sup> For PRS tenancies, evictions are the most frequent reason for applications to the FTT, with eviction applications making up 37% of applications received in 2021/22.<sup>33</sup> While the FTT does not currently collect data on the grounds on which eviction applications are brought, Scottish Government research found that between September 2019 and March 2020 the primary ground for eviction applications in PRS tenancies was rent arrears (77.5%).

There has been an increase in the number of applications that rely on the landlord's intention to sell (21%), to move into the property themselves, or to move a family member into the property.<sup>34</sup> Eviction orders were granted in 91% of cases in 2021/22.

We also know there has been an increase in tenancy terminations as a consequence of rent arrears. Of the 260 tenancy terminations in 2022/23, 86% (223) were due to rent arrears – an increased proportion compared to 2021/22 (71%).

In line with the consumer principles of safety and fairness, we broadly welcome the proposals relating to evictions and we support requiring decision makers to consider whether it is reasonable to delay the enforcement of an eviction at any time of year - rather than only during the winter period. We particularly welcome the inclusion of disability as a consideration, alongside financial and health elements, and the recognition that these circumstances can have a profound impact on tenants all year round.

More regular collection and publication of more granular data regarding eviction applications, outcomes, and tenants' experiences, would help inform where policy changes are needed to achieve improved outcomes for tenants. There is a need to understand better how current redress and protection mechanisms are working for tenants, as we are not aware of any research into the experience of court users in Scotland since 2009,<sup>35</sup> nor of any evidence evaluating how users have experienced access and use of the FTT, since that commenced in 2017.

- We broadly welcome these proposals, but seek better evidence on how the eviction process is experienced by parties going to the FTT.

## **Joint tenancies**

### Question 8. What are your views on Part 4 of the Bill that deals with how joint private residential tenancies can be ended?

In line with the consumer principles of access and fairness, these proposals appear to appropriately balance landlords' and tenants' rights, and are likely to protect both leaving and remaining tenants. The Bill should make it easier for tenants to leave a joint tenancy in the PRS instead of being 'trapped', whilst protecting remaining tenants against losing their home, or undue rent increases.

In line with the consumer principle of safety, we welcome measures to ensure that a joint tenant experiencing abuse would be able to move away from an unsafe place more easily, and with a greater degree of financial control. Tenants leaving an abusive relationship are at a heightened risk during the notice period, which underlines the need to secure safe accommodation as soon as possible.<sup>36</sup> Any detailed proposals should be designed with the protection of tenants in mind, and should be informed by consultation with tenants with lived experience and organisations with specific expertise regarding the needs of domestic abuse survivors.

While it is difficult to collect robust data on how often undue rent increase practices in joint tenancies occur, it is clear that tenants who are experience this are significantly impacted. A tenants' survey conducted by Living Rent between December 2023 and March 2024 found that 6.3% of reported evictions were the result of landlords using new tenancy agreements following the departure of a joint tenant to increase the rent to a level the tenant was unable to afford – in some cases by over 25%.<sup>37</sup> In their Stage 1 briefing for MSPs, Citizens Advice Scotland (CAS) reported an increase in demand in 2023 for advice from tenants who were unable to leave a joint tenancy, and from those who were subject to increases above the rent cap where a tenant successfully exited the tenancy.

- Consumer Scotland welcomes these measures, notes the importance of protecting tenants leaving abusive relationships and calls for further consultation with key stakeholders to ensure effective implementation of these measures.

## **Homelessness prevention and domestic abuse**

Question 9. Overall, do you support the Bill's proposals in Part 5 of the Bill that deal with homelessness prevention?

In principle we support the introduction of statutory duties to encourage early intervention, in line with recommendations made by the Homelessness Prevention Review Group chaired by Crisis.<sup>38</sup> Effective prevention is an important element which can reduce the number of people at risk of homelessness and this is clearly required. Scottish Government figures indicate that in the year to 30 September 2023, the number of households with open homelessness applications increased by 10% to 30,724 and there were 9,860 children who were living in temporary accommodation (an 8% increase).<sup>39</sup> Settled accommodation was secured for only 8 out of 10 households who were unintentionally homeless.

In line with the consumer principles of safety and access, we support the proposal to extend the time period when local authorities are required to provide support to households threatened with homelessness to six months instead of two months.

The extension of these statutory duties will require sufficient resources to be made available for those who are subject to them. The Scottish Housing Regulator has already reported on the difficulties local authorities face in meeting their statutory duties regarding homelessness.<sup>40</sup> In April, the regulator reported that Edinburgh and Glasgow councils were being impacted by systemic failure and a further eight councils are said to be at heightened risk.<sup>41</sup>

- Consumer Scotland supports these proposals, noting the demand for homelessness services and the need for adequate resources to underpin the new duties.

Question 10: What are your views on the 'ask and act duty' for relevant bodies in relation to preventing homelessness in Part 5 of the Bill?

We support a joined-up approach amongst all relevant bodies, but note that different bodies have varying powers and resources which may affect which service is best placed to fulfil the duty. For example, Police Scotland, integrated joint boards, and RSLs all have different systems in place, raising a risk that tenants with complex needs may ‘fall between the cracks’ or simply be signposted to local authorities.

Initial interactions with a service provider can be key to shaping a person’s perception and willingness to engage with authorities around homelessness.<sup>42</sup> It is crucial that staff subject to the proposed duty have been adequately trained to recognise when a person they are assisting may be at risk, can broach the subject in an appropriate way and can respond effectively to their needs.

- We support these provisions but note that they must recognise the individual remits of bodies concerned and that further training and support may be required for effective implementation.

## **Domestic abuse**

### Question 12. What are your views on the provisions in Part 5 of the Bill that relate to domestic abuse?

In line with the consumer principle of safety, we welcome the changes to the definition of domestic abuse in relation to housing matters to bring it into line with current understanding.<sup>43</sup>

We note that women are more likely to become homeless from PRS tenancies than from SRS tenancies and the proposals regarding ending joint tenancies seek to address this.<sup>44</sup> We also note that provisions in the Domestic Abuse (Protection) (Scotland) Act 2021<sup>45</sup> empowering social landlords to effectively remove a domestic abuse perpetrator from a tenancy, are not yet commenced and we would welcome clarity on when this will happen.

We support the requirement to consider the impact of domestic abuse when a tenant accrues rent arrears. In line with the consumer principle of access, it is important that rent arrears associated with domestic abuse and/or coercive control should not adversely impact on a tenant’s ability to enter into a new tenancy in their own name, or to obtain credit.

We note the Scottish Government’s proposed new National Outcome for Housing in the National Performance Framework, which recognises the need for a gendered approach.<sup>46</sup> This emphasises the need for preventative, tailored policies that specifically meet the needs of women and children at risk of becoming homeless. There is a need for more clarity on how the measures proposed in the Bill would help authorities achieve this.

In 2022/23, domestic disputes, abuse, and relationship breakdowns accounted for 33% of homelessness applications.<sup>47</sup> Women (22%) are more likely than men (5%) to become homeless as a result of domestic abuse, and women tend to spend longer in temporary accommodation than men – often with children. Women who have been placed in mixed

temporary accommodation have reported negative experiences, ranging from inadequate and insecure facilities to being harassed by male residents.<sup>48</sup>

The Scottish Government ran a £500,000 Fund to Leave pilot from late 2023 until 31 March 2024 in five local authorities following a working group recommendation.<sup>49</sup> Administered by Scottish Women's Aid, it empowered women to leave abusive partners with grants of up to £1,000.<sup>50</sup> Consumer Scotland understands that many of these grants were used towards tenancy deposits, enabling many women to access their own tenancies and preventing homelessness. Consideration should be given to rolling this out across other local authority areas, and to explore whether a similar pilots might assist other groups at increased risk of homelessness, such as young people.

- Overall, we welcome these proposals, but recommend that the detailed implementation is informed by consultation with tenants with lived experience and organisations with specific expertise regarding the needs of domestic abuse survivors.

## Availability

Would you be interested and available to give evidence to either the Local Government, Housing and Planning Committee or the Social Justice and Social Security Committee?

Yes.

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<sup>11</sup> Consumer Scotland analysis of [Institute for Fiscal Studies Households Below Average Income Dataset \(1961-1993\) | Institute for Fiscal Studies \(ifs.org.uk\)](#) and [Households below average income: for financial years ending 1995 to 2023 - GOV.UK \(www.gov.uk\)](#)

<sup>2</sup> [Rents reach least affordable level in 10 years - Zoopla](#)

<sup>3</sup> [Meeting of the Parliament: 15/05/2024 | Scottish Parliament Website](#)

<sup>4</sup> [Scottish Government and Scottish Green Party: draft shared policy programme - gov.scot \(www.gov.scot\)](#)

<sup>5</sup> [Affordable Housing Supply Programme: quarterly updates on approvals - gov.scot \(www.gov.scot\)](#)

<sup>6</sup> [Affordable Housing Supply Programme: quarterly updates on site starts - gov.scot \(www.gov.scot\)](#)

<sup>7</sup> [Affordable Housing Supply Programme - More homes - gov.scot \(www.gov.scot\)](#)

<sup>8</sup> [Supporting documents - Scottish Budget: 2024 to 2025 - gov.scot \(www.gov.scot\)](#)

<sup>9</sup> [Boosting housing supply to tackle homelessness - gov.scot \(www.gov.scot\)](#)

<sup>10</sup> [Housing affordability study: Findings report - gov.scot \(www.gov.scot\)](#)

<sup>11</sup> [Index of Private Housing Rental Prices, UK - Office for National Statistics \(ons.gov.uk\)](#)

<sup>12</sup> [Housing Outlook Q1 2023 • Resolution Foundation](#)

<sup>13</sup> [Inflation is past its peak but affects low-income households disproportionately | Consumer Scotland](#)

<sup>14</sup> [The differences in how consumers in Scotland have experienced the cost of living crisis | Consumer Scotland](#)

<sup>15</sup> [using-legal-services-in-scotland.pdf \(consumer.scot\)](#)

<sup>16</sup> [Vulnerability-in-legal-services-research-FINAL-REPORT-v2-1.pdf \(legalservicesboard.org.uk\)](#)

<sup>17</sup> [Homing in, How to improve the lives of older renters in Scotland \(independentage.org\)](#)

<sup>18</sup> [new-deal-tenants-draft-strategy-consultation-paper.pdf \(www.gov.scot\)](#)

<sup>19</sup> [consumer-scotland-response-to-new-net-zero-standard-for-social-housing.pdf](#)

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- <sup>20</sup> [scottish-government-heat-in-buildings-bill-consultation-response-8-march-2024.pdf \(consumer.scot\)](#)
- <sup>21</sup> [Giving effect to the proposed Domestic .Rowley MSP - Final - December 2022.pdf \(parliament.scot\)](#)
- <sup>22</sup> [response-to-the-scottish-government-consultation-on-a-human-rights-bill-for-scotland.pdf \(consumer.scot\)](#)
- <sup>23</sup> [Consumer Scotland Act 2020 \(legislation.gov.uk\)](#)
- <sup>24</sup> [The Consumer Scotland Act 2020 \(Relevant Public Authorities\) Regulations 2024 \(legislation.gov.uk\)](#)
- <sup>25</sup> [The Guidance | Consumer Scotland](#)
- <sup>26</sup> [Index of Private Housing Rental Prices, UK - Office for National Statistics \(ons.gov.uk\)](#) and [Trends in the Size of the Private Rented Sector in Scotland - Private Sector Rent Statistics, Scotland, 2010 to 2023 - gov.scot \(www.gov.scot\)](#)
- <sup>27</sup> [Through the roof • Resolution Foundation](#)
- <sup>28</sup> [220215-Rent-control-web-ready.pdf \(housingevidence.ac.uk\)](#) and <https://housingevidence.ac.uk/wp-content/uploads/2024/04/220215-Rent-control-web-ready.pdf>
- <sup>29</sup> [new-deal-tenants-draft-strategy-consultation-paper.pdf \(www.gov.scot\)](#)
- <sup>30</sup> [Policy Memorandum accessible \(parliament.scot\)](#)
- <sup>31</sup> [energy-en23-01-energy-affordability-consumer-scotland-energy-tracker-winter-2023-24-briefing.pdf](#)
- <sup>32</sup> [Private Housing \(Tenancies\) \(Scotland\) Act 2016 \(legislation.gov.uk\)](#)
- <sup>33</sup> [Microsoft Word - HPC statistical report 21-22 final version 1906023.docx \(housingandpropertychamber.scot\)](#)
- <sup>34</sup> [new-deal-tenants-draft-strategy-consultation-paper.pdf \(www.gov.scot\)](#)
- <sup>35</sup> [The Views and Experiences of Civil Court Users | Ipsos](#)
- <sup>36</sup> [010998-2020-Femicide-Report\\_V2.pdf \(femicidecensus.org\)](#) The census examines the years 2009 – 2018.
- <sup>37</sup> [Pushed to the edge: LR report April 2024 \(nationbuilder.com\)](#)
- <sup>38</sup> [preventing-homelessness-in-scotland.pdf](#)
- <sup>39</sup> [Homelessness in Scotland: update to 30 September 2023 - gov.scot \(www.gov.scot\)](#)
- <sup>40</sup> [Update to our February 2023 thematic review of homelessness services in Scotland - December 2023 | Scottish Housing Regulator](#)
- <sup>41</sup> [Our risk assessment of social landlords: summary outcomes - April 2024 | Scottish Housing Regulator](#)
- <sup>42</sup> [I-SPHERE's Director Welcomes NAO Report on Homelessness – I-SPHERE \(hw.ac.uk\)](#)
- <sup>43</sup> [Domestic Abuse \(Protection\) \(Scotland\) Act 2021 \(legislation.gov.uk\)](#)
- <sup>44</sup> [Main findings: 2022-23 - Homelessness in Scotland: 2022-23 - gov.scot \(www.gov.scot\)](#)
- <sup>45</sup> [Domestic Abuse \(Protection\) \(Scotland\) Act 2021 \(legislation.gov.uk\)](#)
- <sup>46</sup> [Consultation with Parliament in connection with the Review of National Outcomes | National Performance Framework](#)
- <sup>47</sup> [Main findings: 2022-23 - Homelessness in Scotland: 2022-23 - gov.scot \(www.gov.scot\)](#)
- <sup>48</sup> [Improving-Housing-Outcomes-for-Women-and-Children-Experiencing-Domestic-Abuse-Report.pdf \(womensaid.scot\)](#)
- <sup>49</sup> [Improving-Housing-Outcomes-for-Women-and-Children-Experiencing-Domestic-Abuse-Report.pdf \(womensaid.scot\)](#)
- <sup>50</sup> [Fund to Leave | Scottish Women's Aid \(womensaid.scot\)](#)