Capability Scotland campaigns with, and provides education, employment and care services to disabled people across Scotland. The charity is also one of the Scottish Government’s Key Strategic Partners for housing. Along with the Glasgow Centre for Inclusive Living (GCIL) we have recently undertaken an ambitious involvement project aimed at radically improving disabled people’s access to suitable housing.

Summary

- Capability Scotland actively supports the Scottish Government’s internationally acclaimed commitment that all unintentionally homeless households will be entitled to settled accommodation by 2012.

- Whilst many disabled people are homeless as a result of becoming physically unable to access their home, many more are homeless in the eyes of the law, despite continuing to live in their home, as it is deemed unreasonable for them to continue to occupy the property.

- Despite the increased duties on both councils and Registered Social Landlords to meet the needs of homeless people, disabled homeless people are still reporting to us that insufficient accessible permanent and temporary accommodation is available.

- We believe however that the combined impact of the measures included in the UK Government’s Welfare Reform Bill alongside the limited supply of suitable housing presents real challenges to making this commitment a reality for disabled people.

- The Scottish Government’s own analysis of the welfare reform cuts points to rising levels of homelessness and hardship. These cuts not only undermine the recent progress local authorities have made in preventing homelessness, but will also threaten their ability to remedy homelessness for disabled people.

Our Response

The Scottish Government will be unable to meet the 2012 homeless commitment unless it addresses the extreme shortage of accessible housing in Scotland. This requires significantly more accessible accommodation to be built, and also a significantly easier and quicker process for support with adaptations to the disabled people’s homes to be introduced.

The issue is two-fold. Firstly, many people become homeless when they become disabled as they are no longer able to access their home. Secondly, disabled people awaiting adaptations in housing that does not meet their assessed needs constitute the ‘hidden homeless’. Whilst they have a place to live it is recognised with housing law that ‘it is not reasonable for them to continue to occupy this accommodation’. This cohort of people have the right to present as homeless but in general do not, either because they are unaware of homelessness legislation or have legitimate concerns that they might end up in unsuitable temporary accommodation.

The Government has clear evidence of the size and impact of the mismatch between the demand and supply for housing suitable for disabled people. The Government’s own analysis of the 2004 Scottish House Condition Survey (SHCS) clearly illustrates a significant shortfall in the supply of accessible housing for disabled people. It found that the following accessible housing had been built in Scotland:

- 26,000 ambulant disabled properties compared to 199,402 households using a stick or walking framework, which equals 13% of need met and an additional 173,400 properties needed.

- 7,000 full wheelchair properties compared to 36,221 wheelchair users, which equals 19% of need met and an additional 29,221 properties needed.

1 See [http://www.capability-scotland.org.uk/what-is-capability-doing-for-me-now/campaigns/housing-partnership/](http://www.capability-scotland.org.uk/what-is-capability-doing-for-me-now/campaigns/housing-partnership/).
This situation has not changed significantly in the last 8 years. In Glasgow new build projects have only been averaging 30 new wheelchair accessible and barrier free properties a year. If new builds continue to increase at the current rate it will take approximately 133 years to make up the current estimated shortfall\(^2\).

Unless the Government actively engages with this problem and finds a solution that all housing developers work to, the housing stock in Scotland will simply be unable to meet the long-term needs of homeless disabled people.

In relation to adaptations the picture is no less bleak. Combined data from the 2005/06, 2007 and 2008 SCHS suggests that 137,000 dwellings in Scotland require adaptations and that “one in five disabled people requiring an adapted house live in a house that is ‘not at all’ or ‘not very suitable’ to their needs.”

Capability Scotland’s advice service has received hundreds of calls from disabled people who been told their landlord does not have the money to carry out the adaptation which would allow them to use the toilet, wash, cook or spend time with their family. In one case an individual was told that it was unlikely that she would be given a wet room in the next three years as there was already a huge backlog for funding for adaptations in the Register Social Landlord sector.

The true picture of homelessness and disability has therefore in many cases been hidden from policy makers and housing providers. If 137,000 households across Scotland decided to present as homeless on the basis of unsuitable accommodation tomorrow would local authorities be able to meet the 2012 commitment in relation to these people?

The right to adaptations and sufficient grant funding for adaptations is critical in addressing this problem. The Scottish Government and local authorities need to pool resources from health, housing and social care budgets to ensure that funding is made available for all housing providers to adapt properties to meet assessed needs.

Almost all of the changes to housing benefit proposed in the Welfare Reform Bill will have the potential to impact adversely on the 2012 homelessness commitment by both increasing the number of homeless presentations, and reducing the options available to councils to prevent homelessness or secure settled homes. The interconnectedness of the housing system will make it inevitable that cuts felt in one area, such as private renting, will result in increased homelessness presentations to local authorities.

Housing benefit reform is likely to have a disproportionately negative impact on disabled people in Scotland because disabled people are over represented amongst social rented tenants in Scotland\(^3\), more likely to be on lower incomes\(^4\) and in receipt of housing benefit and also to need larger, more expensive properties to rent for wheelchair access, sleepover support or to store equipment for example.

Individual measures such as the extension of the shared room rate (SAR) and plans for direct payment of rent, may put disabled tenants at serious risk of arrears or eviction, and when suitable accessible properties cannot be found see them presenting as homeless. The Scottish Government estimates that there will be 3,000 more homeless presentations during the period of transition taking into account only the first two cuts, the move to basing Local Housing Allowance (LHA) on the 30th percentile of rents and removal of the £15 excess. Up to one fifth of these presentations could involve households that include a disabled person.

---

\(^2\) *Housing homeless disabled people*, Shelter Scotland (2006)

\(^3\) The Scottish Household Condition Survey found in 2009 that 52% of disabled people live in their own home and 48% in rented accommodation, compared to 69% and 31% respectively for non-disabled people.

\(^4\) *Disabled people’s cost of living*, Joseph Rowntree Foundation (2004)
The UK Government estimates that 18% of those affected by the change in the SAR will be disabled people, a total of 11,000 people. Whilst there is a disability-related exemption to the new SAR, a significant proportion of disabled people will not qualify for this and will be in danger of losing their accommodation. Even if suitable shared accommodation is found for these people, which seems highly unlikely, forcing disabled people to share accommodation may well result in unsustainable housing situations, particularly when involving disabled tenants with learning difficulties, mental ill health or behavioural problems.

Other changes, such as uprating by the Consumer Price Index (CPI) and the new size criteria in the social rented sector will have cumulative impacts that will make housing more difficult to obtain or sustain. The restriction on housing benefit for working age claimants under-occupying their home may be particularly problematic for disabled people. It may result in the unhappy irony of disabled tenants who have managed to secure suitable housing being asked to ‘downsize’ and vacate their homes in the context of severe housing shortage. This, at a time when there is a chronic under-supply of one bedroom properties in Scotland, with 22 out of 32 local authorities in Scotland having insufficient supply to meet current demand.

Moving will therefore not be a possibility for many disabled people in the cohort deemed to be under-occupying, whether or not they have specific housing needs that relate to disability. Capability Scotland believes that this measure is poorly targeted, punitive and will do little to address the problem of overcrowding.

Conclusion

The Scottish Government’s 2012 commitment is in severe danger of being undermined by the chronic undersupply of accessible accommodation. The effect of this will be significantly exasperated by the proposals contained in the Welfare Reform Bill.

We would like the Committee to investigate the options available to the Scottish Government and local authorities to alleviate the chronic shortage of accessible housing and adaptations funding which results in many disabled people remaining homeless.

Capability Scotland would also like to see a housing benefit system that is responsive, more supportive, simpler and easier to understand, and flexible enough to change with a household’s fluctuating needs. We have real concerns that each successive restriction in housing benefit level reduces the availability of affordable accommodation to low income households. This is particularly true in remote or rural areas of Scotland where the private rented market is sparse, or where there is a limited supply of social rented properties.

We are particularly concerned about the future for households that include a disabled person and who have particular or difficult-to-meet housing needs. These families could be left with a choice between moving far away from jobs, friends and family to find suitable affordable housing, or accepting higher rents leading to hardship, rent arrears and homelessness. Local authorities will then be left trying to fulfil the 2012 commitment but being unable to secure accessible housing.