

Shelter Scotland

‘No DSS’

A review of evidence on landlord and letting agent attitudes to tenants receiving Housing Benefit

A report for Shelter Scotland by
Dr Beth Watts and Adam Stephenson
I-SPHERE, Heriot-Watt University



I·SPHERE

Institute for Social Policy, Housing and Equalities Research

October 2017

Until there's a home for everyone.

shelterscotland.org

Shelter
Scotland

About the Authors

Dr Beth Watts (Senior Research Fellow, I-SPHERE, Heriot-Watt University)

Mr Adam Stephenson (I-SPHERE doctoral student)

CONTENTS

1	Introduction	5
	Background to the study	5
	Aims of the study	5
	Methods	5
	Structure of the report	6
	The Scottish private rented sector	6
	The legality of ‘No DSS’	8
2	Landlord attitudes to benefit recipients	9
	Landlord practice and preferences	9
	Tenant experiences	14
3	Drivers of landlord reluctance to let to those in receipt of Housing Benefit	16
	Landlord perceptions and attitudes	16
	Material barriers and disincentives	18
4	Improving benefit recipient access to the PRS	24
5	Conclusions	28
	References	30

TABLES

Table 1: Summary of key evidence	13
----------------------------------	----

ACRONYMS

DWP	Department for Work and Pensions
EHS	English Housing Survey
EHS-PLS	English Housing Survey – Private Landlords Survey
HB	Housing Benefit
LHA	Local Housing Allowance
NLA	National Landlords Association
PRS	Private Rented Sector
RLA	Residential Landlord’s Association
SAL	Scottish Association Landlords
UC	Universal Credit

1 INTRODUCTION

Background to the study

The private rented sector (PRS) in Scotland has substantially increased in size in recent years and now accommodates almost double the number of households it did just a decade ago (Wilcox et al, 2017). This growth, combined with broader policy, housing and economic trends, means that the PRS is increasingly seen to play a crucial role in accommodating lower income households, including those in receipt of benefits, experiencing homelessness and/or otherwise vulnerable (Kemp et al, 2011; Kenway et al, 2015). Work during the first year of the Shelter Scotland Private Renting Project¹ has highlighted tenant experiences of landlords and letting agents refusing to house those in receipt of benefits, with other research identifying similar barriers (Crisis, 2011; Gibb et al, 2014). Fitzpatrick et al (2015) have also highlighted the escalating affordability challenges facing benefit recipients living in, or seeking to access, the private rented sector as a result of welfare reforms reducing entitlements to Housing Benefit. These challenges are set to worsen as further reforms reducing entitlements to welfare support are rolled out (Gibb et al, 2014).

The Scottish context is distinct from that in the rest of the UK for a number of reasons that may impact on the barriers facing benefit recipients accessing the private rented sector. Private tenants in Scotland are set to benefit from legislative changes improving their security of tenure (McKee et al, 2017). Moreover, the Scottish Parliament has now begun the process of exercising its limited new social security powers (Scottish Government, 2017a). These developments provide a timely opportunity to consider the scale and drivers of landlord (un)willingness to let to households in receipt of Housing Benefit, and to consider policy measures that could help to address these barriers.

Aims of the study

The main aim of the study is to understand landlord and letting agent attitudes to prospective tenants in receipt of benefits, with a view to informing policy developments to address any barriers this group face accessing PRS accommodation in Scotland. To this end, the specific objectives are to:

- 1 Examine the available evidence on landlord and letting agent attitudes towards renting to people in receipt of Housing Benefit/Universal Credit;
- 2 Assess to what extent, and how, 'real'/material (e.g. letting agent, insurer and/or mortgage lender requirements, benefit administration) and 'perceived'/attitudinal factors (e.g. discriminatory attitudes) interact in informing landlord reluctance to let to tenants in receipt of benefits;
- 3 Make recommendations on how barriers to benefit recipients accessing private rented sector accommodation can be addressed.

Methods

The authors employed a Rapid Evidence Assessment approach to compile and assess sources relevant to the research objectives above. Academic and 'grey' literature from the UK, but also relevant sources from other developed nations, was sourced via a range of search tools, including academic databases, Google and Google Scholar. The review focuses primarily on evidence published during or after 2000.

¹ The Shelter Scotland Private Renting Project seeks to 'make renting fit and fair for all' through three strands: working with private landlords to improve practice; collaborating with letting agents to devise a "Letting Agent Plus" service standard to improve access and tenancy sustainment; and strengthen the consumer voice of private renters by putting private renters' voices at the heart of policymaking.

The weighting accorded to each publication in the review reflects its relevance and scientific rigour. Priority is given to academic studies involving primary data collection and analysis (either via bespoke surveys, landlord panel surveys or qualitative research), but industry (e.g. landlord association) evidence is also drawn upon where relevant, albeit that the sampling methods for these are often less transparent.

Structure of the report

The remainder of this introductory chapter provides an overview of the PRS in Scotland: who lives in it, who owns and manages it, and recent policy developments of relevance to this study's aims. It also described the current legal position on 'No DSS'² practice among PRS landlords. **Chapter 2** reviews evidence on landlord and letting agent practice and preferences in relation to households in receipt of benefits, primarily drawing on research with landlords, but also regarding tenant experiences of seeking PRS accommodation. **Chapter 3** considers the drivers of these practices and preferences, exploring the relative importance of (and interactions between) landlord perceptions of those in receipt of benefits and material considerations (policy, legal, financial) that disincentivise landlords housing those in receipt of benefits. **Chapter 4** identifies and assesses various means by which landlord and letting agent willingness to let to those in receipt of Housing Benefit might be increased. In **Chapter 5**, we summarise the main findings of this report.

The Scottish private rented sector

Scotland's private rented sector has grown rapidly in recent years and now accommodates 15% of households (compared to just 5% in 1999) and accounts for 16% of dwellings (compared to 9.4% in 2005 and only around 7% throughout the 1990s) (Scottish Government, 2017; Wilcox et al, 2017). Unlike in England, the Scottish PRS remains smaller than its 'sister' rental tenure (23% of households live in social rented housing in Scotland), but long term declines in the social rented stock have meant that the PRS is playing an increasing role in accommodating lower-income households, as well as other groups traditionally housed in the PRS (e.g. students and young professionals) (Kemp, 2011; Scottish Government, 2009 and 2016; Kenway et al, 2015). Continued growth of the tenure (as well as further decline of the social rented sector) are expected in Scotland and the wider UK over the next two decades (Stephens et al, 2014; Trevillion and Cookson, 2016)

Around 35% of households in the PRS in Scotland are in poverty, slightly higher than the poverty rate in the social rented sector (33%) (Kenway et al, 2015). Approximately a fifth of PRS households are in receipt of Housing Benefit, representing a higher absolute *number* than in the past, though a smaller *proportion* given growth in higher earning sections of the PRS (Scottish Government, 2015; Fitzpatrick et al, 2015). According to the Scottish Household Survey, 7% of heads of PRS households report being unemployed and seeking work, permanently sick or disabled, or unable to work because of short-term illness or injury, compared to just under a quarter of those in the social rented sector. Employment rates are much higher in the PRS, 57% of households recording being in some form of employment, compared to 38% in the social rented sector. Another stark contrast between the tenures concerns their role in housing higher/further education students, with almost a fifth of the PRS taken up by this group, compared to just 4% of the social rented sector (Scottish Government, 2017). Nearly half (45%) of households in the PRS have a net household income of £20,000 or below, compared to 68% in the social rented sector and 31% in owner occupied housing (Scottish Government, 2017).

That poverty rates in Scotland are now higher in the PRS than in any other tenure (Kenway et al, 2015) reflects not only that it increasingly houses lower income tenants, but also the higher housing cost burden facing PRS tenants. In the decade to 2012/13, rent as a share of income for PRS tenants increased from 20% to 24%, substantially higher than in the social rented (18%) and owner occupied (with a mortgage) (11%) sectors (Kenway et al, 2015). In 2016, the Scottish Household Survey reported that 11% of households in the PRS were not

² 'No DSS' is a shorthand still used by landlords not wishing to let to those in receipt of Housing Benefit. DSS refers to the Department for Social Security, which was replaced by the Department for Work and Pensions (DWP) in 2001.

managing well financially, compared to 19% in the social rented sector and 3% in the owner occupied sector (Scottish Government, 2017).

According to a 2008 survey, conducted as part of a major Scottish Government review of the sector, Scotland's PRS dwellings are largely owned by individuals and couples (84%, with 14% owned by a company and 2% an institution) with small portfolios of properties (80% of individual/couple landlords let 4 dwellings or fewer), that they manage part-time, primarily for business/investment purposes (Scottish Government, 2009; Crook et al, 2009). Though half of PRS dwellings are managed directly by their landlord, a third are managed wholly by an agent, and a fifth partly so (Crook et al, 2009). A 2014 survey of almost 500 landlords in Glasgow revealed a similar picture (Johnston, 2015). Many Scottish landlords entered the market during the 2000s as a result of property's strong performance as an investment, and propitious mortgage finance opportunities (Crook et al, 2009). As such, private landlordism in Scotland (and the wider UK) has been described as a 'cottage industry' (Crook et al, 2009), which has led to efforts to try and support and enable greater professionalism in the sector (Scottish Government, 2009). This was a key theme in the Scottish Government's 2007-09 Review of the Private rented sector³.

A number of legal and policy changes have sought to improve standards and professionalism in Scotland's PRS. Since 2006, landlords have been required to register with their local authority⁴, though a 2011 evaluation of the scheme highlighted its limited impacts in improving standards and helping to ensure compliance (Lees and Boyle, 2011; Moore, 2017). The Housing (Scotland) Act 2014, introduced a registration requirement for letting agents. From 2018 all letting agents operating in Scotland will be required to be registered, to abide by a statutory Code of Practice⁵ and to meet a minimum set of training requirements.

In 2008, a national voluntary accreditation scheme for landlords and letting agents (Landlord Accreditation Scotland) was established to replace and improve provision offered by local schemes. Participating landlords agree to abide by a set of core standards, including a commitment not to discriminate against tenants or prospective tenants because they are entitled housing or other benefits (Landlord Accreditation Scotland, 2011). It is not clear how many landlords and agents currently belong to the scheme, though the last large-scale landlord survey identified limited engagement with accreditation schemes, as well as limited landlord interest in training (Crook et al, 2009).

Significant changes to the operation of the private rented sector were introduced by the Private Housing (Tenancies) (Scotland) Act 2016, the relevant provisions of which come into force in late 2017 (McKee et al, 2017). The Act seeks to: improve security for PRS tenants (by removing the 'no fault' ground for repossession, restricting grounds for repossession in the first six months, and introducing 'open ended' tenancies and longer notice periods); simplify the tenancy system (by introducing a recommended 'model' tenancy agreement); and restrict landlords' ability to increase rent levels in pressurised markets. Also in 2016, the Scottish Government announced their intention to develop a Rental Income Guarantee Scheme, which will seek to promote investment in PRS stock 'at scale' by underwriting rental income from PRS schemes for a period (Barnes, 2016; Scottish Government, 2016b).

Also of relevance to Scotland's PRS are a range of changes to entitlements to help with housing costs, some of which were introduced under the last Labour administration in 2008, but most of which flow from the UK-wide welfare reform programme initiated by the 2010 Conservative-Liberal Westminster government (Fitzpatrick et al, 2015; 2017). As discussed below, these benefit cuts and other changes appear to have had significant impacts on landlords' willingness to let to those in receipt of benefits. Of potential future relevance are the provisions of the Immigration Act 2016, which introduced an obligation on private landlords to check whether tenants are in the country legally (i.e. have a 'right to rent') (Home Office, 2016).

³ See <http://www.gov.scot/Topics/Built-Environment/Housing/privaterent/government/prsreview>

⁴ *Mandatory registration is now in place in Scotland, Wales and Northern Ireland, but not in England (Moore, 2017).*

⁵ See <http://www.legislation.gov.uk/ssi/2016/133/contents/made>

The legality of 'No DSS'

Refusing to let to prospective tenants in receipt of social security benefits is lawful under UK-wide equalities law, as income level, income source and employment status are not 'protected characteristics' (Adcock and Wilson, 2016). Equalities legislation protects against indirect as well as direct discrimination, however, thus covering practices that impact disproportionately on those with protected characteristics (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation)⁶. As such, 'No DSS' practices could be considered unlawful where they disproportionately impact on, for instance, women or disabled people, but indirect discrimination of this kind can be lawful if it is 'reasonably justified'. Material barriers to landlords letting to benefit recipients (e.g. conditions attached to Buy to Let mortgages or rental income protection insurance) may provide such reasonable justification (Adcock and Wilson 2016).

'No DSS'-style policies by landlords are unlawful in some other countries. In Belgium, for instance, discrimination based on the source of someone's financial means is illegal, though selection based on the *level* of those financial means is not regarded as discrimination (justified by the 'legitimate goal' to take into account ability to pay the rent). Nevertheless, discrimination in the private sector on the grounds of benefit receipt continues in Belgium. Using an experimental research design, Heylen and Van den Broeck (2016) have shown that landlords in Belgium are less likely to agree to let a prospective tenant view a property based on ethnicity (if they had a Moroccan/Turkish background), disability (blindness), or gender combined with financial means (lone mother with a young child), as well as receipt of social assistance or a disability benefit.

In Ireland, legislation that came into force at the beginning of 2016 made it illegal for landlords or letting agents to: refuse tenants on the basis of their receipt of rent allowance; advertise with prohibitions on rent allowance recipients; or end tenancies because a tenant receives rent allowance or other state supports (Irish Human Rights and Equalities Commission, 2016), with examples of enforcement action (fines) against agents now available (e.g. Deegan, 2017; BBC, 2017). The change has been criticised by landlords, but also attracted criticism from homelessness organisations for not tackling the underlying causes of such discrimination, namely, the gap between rent supplement levels and market rents (O'Regan, 2015; Minihan, 2015). Qualitative research with tenants suggests that such discrimination is still happening (Moore and Dunning, 2017).

The likely advantages and disadvantages of following Belgium and Ireland in pursuing legal change in this area in Scotland are considered in [chapter 4](#), following a review of evidence on landlord and letting agent attitudes and practice in relation to letting to those in receipt of benefits ([chapter 2](#)), and the drivers of those attitudes and practices ([chapter 3](#)).

⁶ Note that Part 4 of the Equality Act 2010 which deals with lettings does not apply to the protected characteristics of age or marriage and civil partnership, so landlords can lawfully select on these grounds (e.g. excluding students).

2 LANDLORD ATTITUDES TO BENEFIT RECIPIENTS

This chapter reviews available evidence on UK/Scottish private landlord and letting agent willingness to let to those in receipt of social security benefits. Various kinds of evidence are relevant here. The main focus is on landlord-focused research (asking landlords about their letting practices, preferences and future intentions), but tenant-focused research (exploring tenant experiences of searching for private lets) is also considered.

Landlord practice and preferences

This section focuses on landlord practice (whether they do or don't in fact let to particular groups) and preference (whether they are *willing* to let to particular groups and/or *prefer* particular kinds of tenants). Available data should be interpreted in light of the fact that landlords may not be fully aware of (prospective) tenants' income source(s) for several reasons: first, in cases where Housing Benefit (HB) is paid direct to the tenant, landlords may be unaware of letting to HB recipients; second, employment status and benefit receipt is dynamic and changes over time, so landlords who exclude or seek particular kinds of tenants may end up housing other groups; third, there may be confusion on the part of some landlords regarding tenants who are in receipt of HB but in work and 'out of work benefit claimants' (Beatty et al, 2014; Gibb et al, 2014; Clarke et al, 2015; Scanlon and Whitehead, 2016). Note for instance that in a 2016 survey of 2,500 landlords, only 6% reported housing Local Housing Allowance (LHA)⁷ claimants, which is inconsistent with English Housing Survey (EHS) data, which found that 28% of private tenants receive Housing Benefit (Scanlon and Whitehead, 2016). Evidence on landlords' willingness, preference and intentions to let to those in receipt of HB should also be interpreted in the light of the rising number of LHA claimants in Scotland (see above) and Gibb et al's (2014) caution that data regarding landlord concerns and intentions does not correspond straightforwardly to actual behaviours and outcomes: concerns and intentions (e.g. regarding letting strategies and market exit) may take some time to impact in practice and may not be achievable.

The most detailed evidence on Scottish landlord practice and attitudes towards Housing Benefit recipients comes from a postal and web-based survey of 6,000 PRS addresses across 14 local authorities undertaken by Crook et al in 2008 as part of the Scottish Government's 2007-09 PRS review (Crook et al, 2009). The researchers secured 1,500 responses (a 26% response rate) and were confident that responses from landlords of a representative sample of PRS addresses⁸ had been secured.

According to the findings of this survey, landlords of 69% of PRS dwellings preferred not to let to tenants in receipt of Housing Benefit, with landlords of 30% of dwellings having no preference, and 2% reporting a preference for HB recipients. Company landlords (who account for only 14% of PRS dwellings) appear to be more willing to let to HB recipients (61% of respondents from dwellings owned by such landlords said they preferred not to let to this group). Preferences against HB recipients were highest in Aberdeen and Dundee (76%) and lowest in rural areas (61%). Responses from landlords with larger portfolios (5 dwellings or more) were less likely to register a preference against HB recipients (61% expressed such a preference compared to 71% of respondents from addresses owned by landlords with only 1 letting).

Landlords also expressed strong preferences in favour of tenants in paid work. More than three quarters (77%) of respondents reported such a preference, with 7% preferring students and 14% having no preference regarding tenants' economic status. One per cent of respondents reported preferring to let to unemployed people. The preference for in-work tenants was somewhat less strong (71%) among business landlords (those for whom letting is their full-time occupation), though only 7% of dwellings are owned by such landlords.

⁷ Local Housing Allowance is the way that Housing Benefit is calculated for private tenants.

⁸ PRS addresses rather than landlords per se were sampled to ensure that landlords with large portfolios were not under-represented. The authors point out that this ensures that in discussion landlord attitudes, it is clear what proportion of the stock is owned by landlords with different views and practices.

Over half (60%) of PRS dwellings are owned by landlords with a strong preference regarding tenants' household type (40% were owned by landlords without such a preference). Childless couples and single over 25s were each preferred by 20% of respondents, with 9% recording a preference for couples with children, 6% for single under 25s and just 2% for lone parents. Since the publication of these findings, benefit reforms (see chapter 3) have extended restrictions on the housing support entitlements of under 25s (the Shared Accommodation Rate), to under 35s. As a result, landlord willingness to let to 25-34 year old singles has almost certainly declined⁹.

Crook et al's (2009) survey also asked specifically about willingness to let to homeless households in circumstances where the rent is guaranteed by the council or the rent is guaranteed and the council manages the property. In both cases, over 50% of dwellings are owned by landlords who would definitely not or probably not let to either homeless families or single people. Council management of properties made respondents slightly more likely to consider letting to homeless households, and respondents expressed higher levels of willingness to let to homeless families rather than singles (35% would definitely or probably let to families where the rent was guaranteed, compared to 22% for singles). Repeating the pattern seen above for benefit recipients, company landlords and those with larger portfolios were more willing to let to homeless people.

A survey of nearly 500 registered landlords in Glasgow undertaken in 2014 provided further and more recent evidence on landlord's attitudes to letting to benefit recipients (Johnston, 2015). Almost two thirds of landlords (58%) reported placing some restrictions on the types of tenants they are willing to accommodate. Of those who reported employing such restrictions, the most common was against tenants in receipt of Housing Benefit (29%), with 22% reporting restrictions against tenants with a previous eviction and 20% not willing to let to homeless households. It is not clear whether responding landlords were able to report use of multiple restrictions on tenants.

Comparing these results to the findings of Crook et al (2009), the authors suggest that "*landlords may now be more receptive to extending the PRS's role in meeting the needs of vulnerable households and housing options customers than they may have been previously*" (Johnston, 2015, p. 28). However, there are significant methodological differences between the studies, including that the more recent survey asked about the *restrictions landlords place on tenants they are willing to accommodate*, whereas Crook et al (2009) asked landlords about their letting *preferences*. We might expect more landlords to have preference against benefit claimants than actually impose such a restriction, and such preferences may still act to exclude benefit recipients, especially in a context where 95% of landlords report no difficulty in finding new tenants.

The Glasgow survey also asked participating landlords whether they would be interested in a management service offered by Glasgow City Council or a housing association. Just under half expressed some interest, but of those, some reported that they would not accept tenants in receipt of Housing Benefit (23%), homeless households (17%) or tenants who could not provide a reference from a previous landlord (15%).

In 2016, Reeve et al reported findings of a postal and email/online survey of almost 1,000 landlords in England and Scotland conducted in late 2015/early 2016. Responding landlords were asked whether they were willing to let to people claiming Housing Benefit, Local Housing Allowance and Universal Credit (UC). Over half (52%) reported not being willing to do so. A much higher proportion (80%) reported *not* being willing to accommodate homeless households. Of the 20% of landlords who were willing to accommodate this group, some would only do so via a Private Sector Leasing arrangement, in which a council or HA leases a house or flat from a private landlord to let to a household in housing need (McLachlan, 2006). Only 14% of landlords were willing to let to homeless households outside such a scheme.

The results from the Reeve et al (2016) study suggest that some kinds of landlords were more *willing* to let to HB claimants, including: full time landlords; landlords with larger property portfolios (6 or more properties); and

⁹ In a recent online survey of almost 2,000 landlords exploring landlord attitudes to accommodating under 35 year olds, Pattison and Reeve (2017) found that of the 30% of landlords reporting a change to their letting strategy in the last three years, 32% had actively sought to decrease lettings to this group and almost all of those (87%) had stopped letting to under 35s in receipt of Housing Benefit.

more experienced (10+ years) landlords. The results also indicated regional variations in landlords willing to let to benefit recipients. Landlords with properties in London were least likely to let to this group (only a third were willing). Landlords with properties in the North of England were more willing to let to this group, and landlords with properties in Scotland most willing (over 60%). Similar results pertained in the case of letting to homeless households. Almost 30% of landlords with properties in Scotland reported willingness to house this group. These geographical variations are likely to reflect in substantial part the nature of housing markets in different areas, with landlords least likely to let to those in receipt of benefits (or homeless households) where demand is high from other groups. The survey also indicated that many landlords have put safeguards in place when letting to those in receipt of Housing Benefit, including more use of guarantors and more extensive take up of references (see also Shelter, 2017 and Pattison and Reeve, 2017).

Shelter's 2016 survey of just over 1,000 UK private landlords (the vast majority of whom let properties mainly in England) found that 42% of landlords reported not letting to this group, with a further 21% preferring not to (but occasionally doing so) (Shelter, 2016). Only 29% reported having no strong preference either way. A fifth of landlords reported currently letting to tenants in receipt of HB/LHA, and this was more common among landlords operating in the North, among those with more properties or more experience, and among those not using an agent for all of their properties.

Another key source of information on landlord attitudes to benefit recipients comes from the extensive evaluation work carried out to understand the impact of the Local Housing Allowance regime. The fully rolled out LHA regime was subject to extensive evaluation, including specifically on landlord practices and preferences vis-a-vis working tenants, tenants on out of work benefits, and HB/LHA recipients. Beatty et al (2014) conducted a large-scale two-wave postal survey of landlords in 19 areas across Great Britain. Almost 2,000 landlords responded to wave 1 of the survey conducted in Autumn 2011 and almost 1,000 took part in wave 2 of the survey in Autumn 2012.

At wave one, 65% of responding landlords reported preferring to let to 'working people', with 9% reporting a preference for 'out of work benefit claimants' (Beatty et al, 2012). In a later report, Beatty et al (2014) report findings regarding landlord practice/preferences in letting to LHA/HB recipients (a wider group than 'out of work benefit claimants', as some LHA/HB tenants are in employment). This analysis focuses specifically *on the subset of around 670 landlords who had LHA tenants at both waves 1 and 2 of the survey* (referred to as 'LHA landlords'). As such, the results now reported cannot be considered representative of all landlords. It may be that LHA landlords are more willing to let to out-of-work benefit claimants than landlords who will not let to LHA claimants. In this analysis, 79% of LHA landlords reported letting to 'out of work benefit claimants', much higher than the proportion reporting letting to students (17%) and retirees (27%) and the same as reported letting to 'working people'. Considerably fewer landlords in Inner London and Rural areas reported letting to out of work benefit claimants however (around two thirds in both cases), but higher proportion of landlords reported letting to this group in cities in general (82%) and (as would be expected) LHA dominant submarkets (older industrial areas and seaside towns) (90%). At wave two, the overall proportion of LHA landlords letting to out of work benefit claimants had fallen by 7% to 73% and had fallen most dramatically in inner London (from 66% to 54%) (both statistically significant changes).

The postal survey also asked landlords whether they preferred to let to tenants receiving LHA or those not receiving LHA, or had no preference. At wave one, 16% of all LHA landlords reported preferring HB/LHA tenants, with much higher preference for this group in Inner London (28%). By wave two, the proportion of all LHA landlords reporting this preference had fallen to 12% (a statistically significant change). The proportion of LHA landlords reporting preferring to let to tenants *not* on HB/LHA remained stable at around 50% between waves 1 and 2, though there was a large and statistically significant change in the proportion of LHA landlords in Inner London reporting such a preference. At wave 1, 34% of Inner London LHA landlords reported preferring to let to tenants not on HB/LHA, rising 15% to half of such landlords by wave 2.

Qualitative interviews with landlords and other key housing stakeholders conducted as part of this study (Beatty et al, 2014) reinforced this increased reluctance of many landlords to let to LHA tenants, and that even among

landlords still willing to, more stringent financial vetting processes had been adopted. Unwillingness or preferences against letting to these groups were far from universal, however. At wave 2, more than 1 in ten of all LHA landlords still expressed a preference for those in receipt of LHA/HB and nearly three quarters reported letting to out of work benefit claimants. Indeed, some landlords reported still valuing the regular rent payments from LHA recipients, in particular in LHA dominant submarkets or for particular properties for whom LHA tenants were the main market (see also Rhodes and Bevan, 2010). Preferences for or against LHA recipients also interacted with preferences on household type. For example, while some landlords wouldn't consider letting smaller properties to single men in receipt of LHA, they would let larger homes to single parent families in receipt of HB.

Wallace and Rugg (2014) report findings from the (unpublished) BRDC Continental's Landlords Panel, which gathers information from a sample of 1,000 UK landlords quarterly. According to Wallace and Rugg, in 2013, 22% of participating landlords were willing to let to those in receipt of Local Housing Allowance, a substantial reduction on 2010 when 46% of participating landlords were willing to do so. Based on analysis of English Housing Survey Private Landlords Survey (EHS-PLS) data collected in 2009-10, Wallace and Rugg (2014) report that 53% of individual and almost three quarters of company landlords were happy to let to those in receipt of Housing Benefit. In answer to a separate question regarding which groups of tenants they generally let properties to, just over 40% of landlords answered those in receipt of Housing Benefit. In practice, the same data indicated that one fifth of PRS tenants were on Housing Benefit. This varied according to whether the landlord used an agent to let the property or not: only 10% of landlords who used an agent to let the property had such a tenant compared to 34% who had not used an agent.

In a survey of 200 landlords and letting agents in England, Clarke et al (2015) asked in principle, which groups respondents 'might consider letting a property to, should one become available now'. The most 'popular' groups named were singles or couples without children (64%) and families with children (49%). The survey distinguished between varying sub-categories of prospective tenants in receipt of Housing Benefit: 42% of landlords would consider letting to employed people on Housing Benefit, compared to only 28% in the case of unemployed HB recipients; and 23% in the case of referrals from local authorities (generally on Housing Benefit). Consistent with other evidence reviewed here, this suggests that well over half of landlords would not consider letting to those in receipt of Housing Benefit, even if they were in work. They also consider landlords' tenant selection for subsets of their portfolio, specifically 'budget properties'. Over a third of all landlords reported having at least some property they described as being 'for those on a tight budget'. Focusing on these properties specifically, 75% of landlords would consider an HB tenant, and 57% an unemployed HB tenant.

It is not clear from the evidence reviewed here whether letting practices excluding benefit recipients will be more common in those sections of the market managed by letting agents or by landlords directly. As Heylen and Van den Broeck explain:

"While one segment (dwellings managed by real estate agencies) is more formalized and controlled (allowing less opportunities to discriminate), the other segment allows more individual and personal contact between landlord and tenant which may be in the advantage of the tenant (offering more opportunities for an individual candidate to eliminate statistical discrimination)" (p. 227)

That a much smaller proportion of landlords who use letting agents appear to accommodate HB recipients according to EHS data (see above) may suggest that contact between landlords and prospective tenants has the effect that Heylen and Van den Broeck hypothesise, but may also reflect more stringent financial checking procedures on the part of letting agents. This perspective is supported by Clarke et al (2015) whose research with landlords in England indicates that while letting agents will often defer to landlords' opinions on willingness to accommodate particular groups¹⁰, they often outsource affordability checks to credit referencing agencies and

¹⁰ Note however that a small proportion (4%) of landlords who reported preferring not to let to those in receipt of HB gave letting agent advice as the reason for doing so.

have varying degrees of knowledge on the affordability criteria used by those agencies. Landlords by comparison were 'less consistent' in their practice in this area, and some "relied on their judgement after meeting the tenant" (p.45).

Table 1: Summary of key evidence

Key findings	Scope	Data collection	Research method	Reference
Landlords of 69% of PRS dwellings preferred not to let to tenants in receipt of HB.	Scotland	2008	Paper and email/ online survey of 1,528 landlords.	Crook et al, 2009
58% of landlords placed some restrictions on the types of tenants they are willing to accommodate. Of those, 29% used restrictions against tenants in receipt of HB.	Glasgow	2014	Survey of 487 registered landlords.	Johnston, 2015
52% of landlords were not willing to let to people claiming HB, LHA and UC.	England and Scotland	2015/16	Postal and online survey of 949 landlords.	Reeve et al, 2016
42% of landlords reported not letting to HB claimants; 21% preferred not to (but occasionally did so).	UK (primarily England)	2015	YouGov survey of 1,071 private landlords.	Shelter, 2016
<ul style="list-style-type: none"> ■ 65% of all landlords reported preferring to let to 'working people' at wave 1 ■ 79% of LHA landlords reported letting to 'out of work benefit claimants' at wave 1, falling to 73% at wave 2 ■ 50% of LHA landlords reported preferring to let to tenants not on HB/LHA, stable nationally between waves 1 and 2 ■ 34% of Inner London LHA landlords reported preferring to let to tenants not on HB/LHA, rising 15% to half of such landlords by wave 2 	Great Britain	wave 1: 2011; wave 2: 2012	Postal survey of 1,867 landlords at wave 1 and c. 967 landlords at wave 2. Main analysis focused on 670 landlords with LHA tenants at waves 1 and 2.	Beatty et al, 2012 and 2014
In 2013, 22% of landlords were willing to let to those in receipt of LHA, down from 46% in 2010.	UK	Longitudinal panel	BRDC Continental data from quarterly panel of approx. 1000 landlords.	Wallace and Rugg, 2014
53% of individual and almost three quarters of company landlords reported being happy to let to those in receipt of HB.	England	2009/10	English Housing Survey Private Landlords Survey of approx. 1000 landlords.	Wallace and Rugg, 2014
<ul style="list-style-type: none"> ■ 42% of landlords would consider letting to employed people on HB ■ 28% of landlords would consider letting to unemployed HB recipients 	England	Not known	Online survey of 194 landlords and letting agents.	Clarke et al, 2015

Landlord representative organisations and other industry bodies have also published data relevant to the question of landlord attitudes towards benefit claimants. The National Landlords Association (NLA) (which covers the whole of the UK) has consistently reported substantial reductions in the proportion of landlords willing to let to this group. Most recently, they reported that the proportion of landlords who let to tenants in receipt of Housing Benefit declined from 36% in 2012 to 20% in 2016 (NLA, 2016). In July 2013, they reported that 51% of landlords actively choose not to let to benefit claimants, with reluctance greatest among smaller landlords (NLA, 2013; see also Work and Pensions Committee, 2016). These figures appear to be based on the NLA's quarterly landlord panel, which gathers responses from around 1,000 member landlords. The results of a Spare Room poll of 1,500

landlords¹¹ reported in the Guardian in 2014 echo many of these points. The poll suggested that 18% of landlords reported having tenants on Housing Benefit in one or more of their properties, a considerable reduction compared to the one third of landlords who reported this two years earlier. According to the Guardian, 57% of responding landlords “*refused to accept anyone on benefits now, specifically stating “no housing benefit tenants” in their adverts*” (Osborne, 2014).

A rather different picture is suggested by a Scottish Association of Landlords (SAL) survey of members carried out in 2014 (SAL, 2014). The report does not give details on the size or make-up of the survey sample, but makes the general statement that SAL surveys receive a response rate averaging 27% of their 1,800 plus members. According to the 2014 report, 68% of responding landlords let to tenants in receipt of Housing Benefit, considerably higher than the proportion of UK-wide landlords who do so according to the NLA. The survey indicated, however, that almost two thirds of landlords said they did not expect to let to tenants in receipt of benefits in the future and 42% had or planned to issue tenants on benefits with notice to quit. These results are likely connected the welfare reform programme (see below), but note that the survey was conducted prior to Scottish Government announcements that devolved powers over social security will be used to mitigate some of these Westminster-led reforms, particularly concerning the operation of Universal Credit.

The evidence reviewed above on landlord practices and preferences – and summarised in table 1 - makes clear that a substantial proportion of landlords do not, or prefer not, to let to tenants in receipt of Housing Benefit, and more narrowly, out of work benefit recipients. Other key findings suggested by the evidence review are that:

- the proportion of landlords and letting agents unwilling or preferring not to let to this group is rising, linked to welfare reforms limiting entitlements to Housing Benefit (see below);
- even among landlords still willing to let to these groups, more stringent financial vetting procedures have been adopted;
- landlords with smaller portfolios and individual landlords are less willing to house benefit recipients than landlords with larger portfolios and company landlords;
- using a letting agent may reduce a landlord’s likelihood of letting to those in receipt of benefit due to more stringent financial checks.

There are also important spatial and market dynamics:

- landlords with portfolios in geographical areas and property types more suited to the LHA submarket are more likely to be willing to accommodate those in receipt of benefits;
- landlords in tighter housing markets, such as London and the South of England appear less willing to house benefit recipients (and other vulnerable groups), though within such markets there are nevertheless LHA submarkets;
- landlords’ willingness to house those in receipt of benefit may be somewhat greater in Scotland than in England.

Tenant experiences

Research exploring tenant experiences of seeking PRS accommodation paints a similar picture of the barriers facing those in receipt of benefits. LHA evaluation work focusing on tenant experiences is a key source of information here. The evaluators (see Kemp et al, 2014 and Beatty et al, 2012) conducted a face-to-face survey of almost 2,000 tenants claiming LHA across 19 case study areas in Great Britain in Autumn 2011, and follow

¹¹ It is not clear whether the sample includes landlords from across the UK or a narrower subset.

up interviews with around 1,100 of those in Autumn 2012. The survey results indicate that of the subset of LHA tenants who had moved, 35% had found it difficult to find accommodation. This figure was higher in Scotland (39%) than in England (33%) or Wales (29%) (perhaps due to the smaller size of Scotland's PRS). The figure was substantially higher in Inner London (61%) and London overall (43%) than in cities generally (36%), LHA dominant markets (24%) or rural areas (17%). LHA claimants in workless households were more likely to have had difficulties finding accommodation than those in working households.

Over half (53%) of claimants who reported difficulties finding accommodation attributed this to landlords being unwilling to house HB claimants, and among London claimants 62% claimants reported such a difficulty. New claimants (those who had started their claim after April 2011 under new rules, see below) were more likely to report landlord unwillingness to let to HB claimants (58%) than existing claimants (52%), suggesting a potential hardening of landlord practice and a greater intensity of this problem in London, in line with the landlord survey results of the LHA evaluation discussed in the previous section. The next most common kinds of difficulty were: rents being generally unaffordable (34% claimants, 50% in London); lack of the types of property needed (15%); properties available in poor condition (9%); rent unaffordable due to low/lower HB payments (8%); couldn't afford properties in better areas (7%); competition from/losing out to other tenants (6%); and competition/losing out to other HB claimants (2%) (respondents could select more than one option) (Beatty et al, 2012).

In their more recent face to face survey of 100 people using homelessness services, Reeve et al (2016) found that very high proportions (69%) report experiencing landlords/letting agents refusing to let to people on benefits, though issues of affordability were reported by an even higher proportion of respondents. Even where landlords are in principle willing to let to those in receipt of benefits, deposit and rent in advance requirements provided an additional barrier, especially as some landlords appear to have increased these requirements as a risk mitigation measure when letting to those in receipt of benefits or homeless households (Beatty et al, 2014; Reeve et al, 2016; Pattison and Reeve, 2017; Shelter 2017).

Similar results have been highlighted in earlier research. A 2009 Shelter survey of 450 LHA claimants in nine local authority areas in England found that 60% found it difficult to find landlords willing to let to those in receipt of LHA (Shelter, 2009). A 2014 YouGov poll of 980 people in receipt of working age benefits currently or in the last five years conducted for Who Benefits? (a coalition of charities seeking to give voice to those requiring benefit support) found that of the 461 respondents in current receipt of benefits, 16% had *"been refused by landlords or letting agents to rent a property"* (Who Benefits?, 2014).

Reviews of advertisements for private rented accommodation paint a similar picture of the barriers facing those in receipt of Housing Benefit. From 2003 to 2005, Shelter collated a database of almost 13,000 PRS advertisements in 8 areas in England, finding that one-third of these barred Housing Benefit claimants (Shelter, 2006). Advertisements for rooms in shared properties were found to be twice as likely to exclude Housing Benefit claimants than advertisements overall. When landlords *not* specifying 'No DSS' or equivalent were contacted by phone, only one in six said they would accept a claimant, a third were unsure, and the rest said they would not let to this group. The report concluded that *"as little as one-tenth of the mainstream market was affordable to, and would accept, tenants on HB who were trying to find homes in the private rented sector"* (p.5). More recently, BBC analysis of flat share advertisements in England found that of almost 12,000 advertisements reviewed on SpareRoom, only 2% were open to people on benefits, with some cities having no advertisements available to benefit claimants at all. The report points out that twice as many lets were available to renters with pets than to those on Housing Benefit. On another website, 17% of 3,300 advertisements reviewed accepted people on benefits (BBC, 2017).

Research on HB claimant experiences of seeking PRS accommodation, and on advertisements for PRS accommodation, provide a useful supplement to landlord surveys, reinforcing the finding that a significant proportion of landlords are reluctant or unwilling to let to this group, with real consequences for the tenure's accessibility. In the next chapter, we consider what drives these attitudes and practices among landlords.

3 DRIVERS OF LANDLORD RELUCTANCE TO LET TO THOSE IN RECEIPT OF HOUSING BENEFIT

A complex and evolving combination of factors drive the reluctance and unwillingness of a large proportion of landlords to house tenants in receipt of Housing Benefit. Two broad kinds of driver can in principle be distinguished: first, landlord *perceptions of, attitudes towards and assumptions about* those in receipt of Housing Benefit, and second, *material considerations (policy, legal, financial) that create barriers or disincentives* to landlords considering housing those in receipt of Housing Benefit. In practice, these two drivers are closely intertwined. In particular, material barriers and disincentives appear to strongly influence landlord attitudes towards those in receipt of Housing Benefit and, in turn, landlord practice.

Landlord perceptions and attitudes

Both quantitative and qualitative evidence demonstrates negative attitudes towards those in receipt of benefits by landlords. Reeve et al's (2016) landlord survey finds that the top factor deterring landlords from letting to HB/LHA/UC recipients is 'concerns about risk of arrears' (a factor for almost 90% of landlords unwilling to accommodate this group), with 'concerns about risk of property damage' and that they 'will require more intensive management and support' a factor for over 60%. In their analysis of 2009/10 EHS-PLS data, Wallace and Rugg (2014) identify among the most common reasons landlords give for not letting to HB recipients as 'unpaid rent', 'anti-social behaviour', 'tenant damage' and 'risk of fraud'.

In qualitative focus-group research accompanying their Scottish landlord survey, Crook et al (2009) identify low expectations of claimants (especially more vulnerable claimants) in managing direct payments of rent to them, rather than the landlord (see below):

"... particularly those people who are most vulnerable and can't manage their own finances on a day to day basis – they're not capable of getting a mortgage or staying in a council house – demons of alcohol, drugs, management of money – the idea of giving them money and that they are going to get past the bookies, the pub to pay you is not credible." (Glasgow landlords, p.79 in Crook et al 2009)

Cole et al (2016) highlight particularly negative attitudes towards single young renters and sharers, drawing on qualitative data from landlords collected in early 2012 and 2013:

"Yeah, they're probably the riskiest of the tenants because by the nature of being youngsters. We've all been there and what you find happening is that you just don't want to take the risk any more. You think 'I'm not going to rent anything to a tenant like that because they're going to end up wrecking the property' and you're going to end up having to refurbish it. If you take people like that you're almost asking for trouble" (Thanet landlord, p7-8 in Cole et al, 2016)

Whilst some of these negative attitudes can be attributed to stigmatised and discriminatory attitudes towards those in receipt of benefits, often argued to reflect media and political rhetoric and representations of benefit claimants (see Baumberg, 2016), it is clear that the factors underlying these attitudes are complex. First, such negative attitudes as do exist are not determinative of landlord practice in all areas or for all landlords, in particular in areas and market segments focusing on the HB submarket. Landlord research consistently finds that a proportion of landlords specifically target those in receipt of benefits, either because this is the major market where they operate, or because they value the regular payments they can receive via this route (in particular if they get rent paid directly to them) (Rugg and Rhodes, 2008; Rhodes and Bevan, 2010; Beatty et al, 2014).

Second, in many (but not all) cases, it appears that negative attitudes reflect past experiences of letting to the relevant group. 'Bad experience' is a common reason given by landlords according to EHS-PLS data and

indeed, according to Wallace and Rugg's analysis, tenants on Housing Benefit had a much higher risk of being in arrears: 11% of landlords had experienced tenant arrears in the last year, with 48% of these involving tenants in receipt of HB¹² (Wallace and Rugg, 2014). In their smaller scale survey of landlords in England, Clarke et al (2015) distinguish between landlords citing previous negative experiences as a reason for preferring not to let to this group, and fears of problems letting to this group but no personal experience of such issues. Over half (55%) of landlords preferring not to take HB tenants reported past experiences of problems, most commonly 'past bad experience with tenants on HB' (49%), but also 'past experience of HB tenants not paying rent' (39%) and 'past bad experience of Housing Benefit payments' (35%). Just under a quarter (23%) of landlords preferring not to let to HB recipients reported higher risks of getting a difficult tenant or of tenants not paying the rent, but no experience of such problems. This could be based on negative experiences of other landlords they know, or discriminatory attitudes. On the basis of these results, Clarke et al argue that *"increasing the supply of property for benefit claimants may be less a matter of changing perceptions, and more a matter of helping landlords cope with these specific problems"* (2015, p.48). Arguably then, at least some landlord reluctance to let to benefit recipients can be attributed to 'legitimate risk aversion', rather than 'illegitimate judgements' against a stigmatised group. Also, consistent with the evidence reviewed here is that some landlords are adopting 'risk averse' exclusionary practice on the basis of isolated and rare 'bad experiences' with HB tenants.

Third, it is clear that landlords' negative attitudes, and any negative past experiences, are very strongly intertwined with factors relating to Housing Benefit policy, not solely (or even primarily) the result of discriminatory or stigmatising attitudes regarding the behavioural deficiencies of benefit recipients. These 'material' policy factors are discussed in greater detail in the next section, but it is important to note that there may be interaction effects between the material context in which landlords operate and their beliefs about, perceptions of and attitudes towards benefit claimants. Cole et al (2016) argue, for instance, that changes to the benefit entitlements of 25-34 year old single people (the extension of the Shared Accommodation Rate, SAR) have contributed to a hardening of landlord attitudes towards this group. Based on their analysis of qualitative interviews with landlords in 2012 and 2013, they suggest that the extension of SAR to this group *"has brought with it equivalent assumptions from landlords about the behavioral attributes that will now be shared with their younger counterparts... [and] compounded their negative views towards this age group"* (p.9). The business reasons landlords now face not to let to this group are *"buttressed by negative attitudes towards their behaviour. The 'taint' of youth was being extended along the age spectrum"* (p.7).

It should be noted that there is also qualitative evidence indicating more positive attitudes towards those in receipt of benefits among at least some landlords. In this case, a landlord expresses understanding for the difficult trade-offs tenants on a low income can face when they must meet a shortfall in their rent not covered by LHA:

"He hasn't got a job so how can he afford that extra £10 anyway? So first two weeks he might be able to pay it, but then after that he'll start crying that he's no food and no money and you can't force him to hand over the £10. It's not their fault, they might want to pay extra... but they just can't afford it" (Blackburn landlord, quoted in Cole et al, 2016, p.6)

Another landlord voiced genuine concern about the impacts of the extension of SAR on some tenants:

"There are going to be certain tenants who it's going to have a massive impact on. My heart bleeds for them, because the majority of them are divorced fathers who see their kids. I've got one lovely guy, he's got three kids, wife lives in Hillingdon, kids come and spend the weekend with him, where's he going to put them? Does he lose his visitation rights to his children because he hasn't got a job or hasn't got the home to be able to offer the children somewhere to sleep because there isn't any room?" (Hackney landlord cited in Cole et al, 2016, p.8)

¹² The reasons for this were unclear, and at the time of the survey there was no association between the tenant being on HB and the landlord reporting having lost money as a result of tenants being on HB and in arrears in the last year.

Beatty et al identify a few cases in which matters of conscience or kindness (as well as more widespread pragmatism) appeared to influence landlords' decisions to reduce the rent charged to LHA levels:

"We've got a tenant in one of the houses nearby, she had problems with paying because her payments were cut and we reduced her rent because she was a good tenant. But if the tenant's not a very good tenant, we'll not reduce the payments. We'd rather clear them out and get somebody else in." (Large landlord, North Lanarkshire, cited in Beatty et al, 2014, p.90)

"In fact the family who gets a top up from the council, I had actually kept his rent at 850. For just a short period and I just thought they can't ... they were scrabbling about trying to give me cash and I said "no let's just drop it down a bit" and that helps you and eases my conscience." (Large landlord, Edinburgh, cited in Beatty et al, 2014, p.90)

Clarke et al (2015) argue that the *"role of social conscience among private landlords and letting agents should not be ignored"* (p.45), citing some examples of 'socially minded' landlords actively seeking to help low income tenants *"as a matter of personal conscience"* (p.13). In general, however, they report that landlords see their role as providing housing and running a business, not tackling poverty. Crook et al (2009) conclude that while Scottish landlords *"accept a degree of responsibility to assist in meeting wider housing need"*, this responsibility only holds where it *"is consistent with running their businesses"* (p. 87). The policy and market context facing landlords when they consider who to let to is thus fundamentally important in influencing their willingness to let to tenants in receipt of Housing Benefit.

Material barriers and disincentives

A number of material factors that appear to be impacting landlords' willingness to let to those in receipt of Housing Benefit are considered here, including PRS regulation, mortgage and insurance company policies and changes to tax rules. Of most central importance, and covered first, is the impact of Housing Benefit administration and reform on landlord practice.

Issues with the administration of Housing Benefit by local housing departments has been a longstanding issue raised by landlords when asked about their willingness to let to those in receipt of HB, in particular in relation to delays in the processing of claims (as a result of complex application procedures, administrative inefficiency/competence and/or claimant errors) leading to arrears (Shelter, 2006; Crook et al, 2009; Rhodes and Bevan, 2010). Of landlords unwilling to let to let to benefit claimants (HB/LHA/UC) in Reeve et al's (2016) landlord survey, three quarters cited 'problems with the administration of benefit payments' as a factor deterring them from doing so, the second most common factor identified (second to concerns about the risk of arrears). Clarke et al's (2015) survey of landlords also indicated issues in this area: of those preferring not to take HB tenants, 35% cited 'past bad experience of HB payments' as a reason for this and 29% that there 'may be too much paperwork/bureaucracy involved'.

That government is able to 'claw back' overpayments of HB from the landlord was also mentioned as an issue deterring letting to this group, particularly smaller landlords less able to tolerate such a risk to their finances. According to Wallace and Rugg's (2014) analysis of 2009-10 EHS-PLS data, 'delays in payment' was the second most common reason given for not letting to HB recipients for individual landlords and the most common reason given by company landlords. Furthermore, they show that Housing Benefit administration problems were associated with landlords reporting mortgage cost problems. Unlike HB/LHA, Universal Credit (UC) (including the housing cost element) is administered centrally by the Department for Work and Pensions (DWP), rather than at the local authority level, a significant concern among landlords (Beatty et al, 2014 and see below).

Direct payment of rent to HB claimants has been extremely controversial among landlords since their introduction in nine 'pathfinder' areas in 2002 and nationally in 2008. Introduced to promote responsibility and awareness of

rental costs on the part of tenants, landlord concerns¹³ oriented around the dependence of their rental income on tenants on an already tight budget prioritising rent above other expenditure, whether luxuries or essentials (Shelter, 2006; Crook et al, 2009; Rhodes and Bevan, 2010; Adcock and Wilson, 2016). The pathfinder evaluation found that the ‘overwhelming majority’ of claimants did not accrue serious arrears (of eight weeks rent or more), in part because of early intervention mechanisms employed to avoid this (Wilson, 2013). Nevertheless, the move to direct payments to tenants has increased landlord reluctance to let to this group (Wilcox et al, 2008). During focus groups with 90 Scottish landlords in late 2008, Crook et al (2009) found that as a result of direct payments to tenants “almost all landlords said they now would work hard to avoid tenants on LHA and would only house them if they had voids in their worst quality properties” (p.79), with more recent evidence indicating ongoing landlord concerns (Beatty et al, 2014; Clarke et al, 2015). Reeve et al’s (2016) landlord survey found that two thirds of landlords reported that direct payments had made them more reluctant to let to those in receipt of HB/LHA/UC, making this the most significant factor driving reluctance. Two thirds of landlords who had put in place some kind of safeguard in the past two years reported now requiring direct payment to them rather than the tenant.

Safeguards are in place to protect landlords from the worst effects of paying rent direct to tenants. Those deemed vulnerable, i.e. who have difficulty managing their money or are in arrears of at least eight weeks, can have their rent paid direct to their landlord. Landlords are also able to secure payments directly where they have negotiated a lower rent (i.e. to match lowered LHA levels, see below). It appears that these flexibilities have been used fairly extensively by landlords and local authorities, including explicitly to encourage landlords to retain LHA tenants (Beatty et al, 2014). Based on data collected in Autumn 2012, 30% of landlords received payments directly for all of their tenancies, 17% for the majority of tenancies and 35% for some of their tenancies, with only 19% of landlords receiving no direct payments. This might suggest that the risks of direct payments disincentivising landlords letting to benefit recipients has been effectively managed to at least some degree, but Beatty et al suggest caution on this point, particularly in more competitive housing markets where landlords can achieve higher rents with other tenants, and Reeve et al (writing in 2016) report landlord testimony regarding the negative impact of direct payments on their business.

An additional and highly significant reason for caution is the ongoing national roll-out of Universal Credit, under which the proportion of landlords receiving direct payments (‘Alternative Payment Arrangements’) is anticipated to be much smaller, and the agreements and accommodations between landlords and local authorities regarding direct payments will cease, given UC’s central administration by DWP (Beatty et al, 2014; Reeve et al, 2016). Early evidence on the impact of UC in 6 Direct Payments Demonstration Projects indicated significant impacts on landlord rental income. Over an 18 month period, tenants on direct payments paid 5.5% less rent on average than they would have done had their rent been paid direct to the landlord (Hickman et al, 2014). The evaluation also highlights impacts beyond those on rent received by landlords, including increases in landlord transaction and rent collection costs. The impact of direct payments on rent arrears did reduce dramatically over time, from 15.7% less rent paid in the first three payment periods, to 2.1% less paid in the final three payment periods. By the end of the period, 87% of tenants receiving direct payments reported ‘coping well’ with this. Despite these improvements over time, it is fair to anticipate negative impacts of the roll out of UC on landlords’ willingness to let to those in receipt of housing support.

The roll out of UC is likely to have impacts on landlord willingness to house those reliant on it beyond those associated with direct payments. Fears have been expressed, for instance, that the removal of housing support under UC for some out of work 18-21 year olds will mean that regardless of exemptions, landlords may simply cease to be willing to let to this group (a group in which landlords already have low confidence, see above) given ambiguity over their entitlements (St Basils, 2016; see also Cole et al, 2015). Another issue likely to impact landlord practice is that payments will be made monthly, in arrears and after a 7-day waiting period (which in addition to processing times means claimants will wait 5-6 weeks for an initial payment) (Butler and Asthana,

¹³ Other concerns have included the link between direct payments to tenants and increased homelessness (House of Commons Communities and Local Government Committee, 2016).

2017). In 2013, the NLA reported high levels of concern among landlords about Universal Credit (NLA, 2013), with a 2014 SpareRoom survey suggesting that over half of landlords who currently let to those in receipt of benefits would not do so after the roll out of UC (Osborne, 2014). It is in light of these concerns that Scottish Government has taken steps to use its devolved social security powers to vary several aspects of Universal Credit's operation, including extending the Scottish Welfare Fund to assist 18-21 year olds not entitled to the housing support element of UC, and enabling tenants to opt for rent to be paid directly to landlords and twice a month rather than monthly (Scottish Government, 2017b; Fitzpatrick et al, 2015). The extent to which these deviations lead to more willingness on the part of Scottish landlords to let to UC claimants is yet to be seen.

In addition to *how* (how efficiently, how often and to whom) LHA/HB and UC is paid, *how much* support with housing costs recipients are entitled to is an additional factor influencing landlord willingness to accommodate recipients. Reforms introduced in 2011/12 reduced LHA rates in a number of ways, including:

- Calculating rates based on the 30th percentile of local rents, rather than the median;
- Capping LHA rates for each property size and introducing a maximum four bedroom rate;
- Introducing less generous uprating of benefit levels;
- Extending the Shared Accommodation Rate to 25-24 year olds.

These measures have been introduced alongside a much wider package of welfare reform squeezing the income of private tenants receiving state support (Gibb et al, 2014; Beatty and Fothergill, 2016; Fitzpatrick et al, 2015; Fitzpatrick et al, 2017), including: Universal Credit which is on average less generous than the benefits and tax credits it replaces (Office for Budget Responsibility, 2017); the overall benefit cap, which caps the benefit income of out of work households below retirement age at £20,000 per annum and particularly affects larger families in high rent areas (Fitzpatrick et al, 2015); and complete freezes on LHA, Housing Benefit, Universal Credit and other working age benefits for four years from April 2016.

Two consequences of LHA reforms (particularly in the context of these wider measures) are that many private rented sector lets are now unaffordable for those in receipt of benefits, and that those who are in private rented tenancies increasingly face a gap between LHA rates and the rent due, thus needing to 'top up' their rent from other income sources (Beatty et al, 2014; Kemp et al, 2014; Fitzpatrick et al, 2015, 2016, 2017). According to Kemp et al's (2014) survey of tenants, only 26% of responding tenants had all of their rent covered by LHA, with 74% facing a shortfall. LHA rates are now "*staggeringly out of step with market rents*" in some areas (Fitzpatrick et al, 2017). There has been a concurrent increase in negotiation attempts between (prospective and current) tenants and landlords about rent levels, as well as an increase in lower rents actually being negotiated. According to Beatty et al's (2014) landlord survey, 9% of LHA landlords at wave 2 (2012) had negotiated a lower rent with a current tenant and 6% with a prospective tenant.

In addition to these 'positive' impacts, however, 47% of LHA landlords reported increases in rent arrears as a result of LHA reforms (both reduced generosity and direct payments are relevant here), 50% in LHA dominant markets and 63% in Inner London. Over half of LHA landlords (and more in LHA dominant markets and Inner London) reported being aware of some of their LHA tenants currently being in arrears, and 28% of landlords (47% in Inner London) attributed these arrears to tenants being unable to afford the rent due to LHA reforms since April 2011, the most common reason given by a significant margin. A Scottish Association of Landlords (2014) member survey, with a much smaller sample and unclear methodology, found even higher proportions of landlords (69%) reporting experience of rent arrears as a result of lower rates of benefits. An NLA (2016) member survey reported similar levels of rent arrears over the last year among respondents (64%).

Beatty et al's (2014) survey indicates that by late 2012, landlords were taking action against LHA tenants to address these concerns: 37% of LHA landlords reported having taken action to evict, not renew or end tenancies of any of their LHA tenants since April 2011, compared to 27% taking the same action against any of their non-HB/LHA tenants. This gap was bigger in LHA dominant markets and (particularly) Inner London. One fifth of LHA

landlords attributed taking this action directly to LHA reforms, but other motivations were also at play, including freeing up accommodation for more lucrative markets, i.e. non LHA tenants, but also for use as temporary accommodation by local authorities. It is also important to note that some landlords appear to be exercising forbearance and ‘tolerating’ some arrears.

Evidence of landlords altering their lettings strategies is therefore not surprising. By wave 2 of Beatty et al’s (2014) landlord survey, 35% of LHA landlords reported having changed their letting strategy, more in Inner London (43%) and LHA dominant Markets (38%), with 30% of landlords (38% in Inner London and 33% in LHA dominant markets) doing so because of LHA reforms specifically. This data is supported by qualitative testimony that landlords were taking an increasingly ‘hard line’ against LHA tenants in arrears. Landlords tended to prefer not renewing tenancies to pursuing evictions, albeit that the threat of eviction was sometimes used to encourage tenants to make top-up payments to fully meet their rent obligations. At wave 2, 18% of LHA landlords reported not renewing tenancies for some HB/LHA tenants and 10% reported no longer letting to HB/LHA tenants (20% in London). Clarke et al (2015) report similar findings, with 37% of landlords and letting agents in their survey who preferred not to let to HB recipients giving ‘risk of HB being cut further’ and 31% ‘I would have to charge a lower rent’ as their reasons. Evidence from the Residential Landlord’s Association (RLA) (2016) paints a similar picture: in a 2016 survey of around 900 UK landlords, 47% indicated that they were now more reluctant to let to benefit claimants due to caps on LHA rates, the same proportion due to the 4 year freeze of HB payments to working age claimants and two thirds of landlords as a result of the benefit cap. High profile examples attest to the ‘worst case’ impact of these trends on landlord practice: in 2014, Fergus Wilson (a large scale private landlord operating in Kent, England) issued eviction notices to all tenants in receipt of HB, with an intention to entirely cease letting to this group (Lunn, 2014)¹⁴.

These trends are less acute outside of London and the south of England and specifically in Scotland, likely due to the overall less tight housing market (Beatty et al, 2013; Gibb et al, 2014; Fitzpatrick et al, 2015). But the impacts of welfare reform do appear to be spreading (Fitzpatrick et al, 2017), including to Scotland, with significant longer-term impacts on landlords (as well as tenants)¹⁵ anticipated (Gibb et al, 2014). Attention to the Housing Benefit caseload in Scotland’s PRS, for instance, indicates that the new LHA regime has “*slowed the rate of growth of claimants able to secure accommodation in the PRS*” (Fitzpatrick et al, 2015, p.23). In particular, it seems likely that documented arrears and rent negotiations between LHA tenants and landlords will cement and increase landlord reluctance to let to this group where they have alternative tenant groups to let to, or where they can exit the market easily, circumstances which will of course not apply to all landlords (Gibb et al, 2014).

A series of other non-welfare policy related factors have also been linked to landlord reluctance or unwillingness to let to those in receipt of benefits. Relevant here are market barriers, in particular policies of some mortgage and insurance (against property damage, arrears or eviction costs) providers that either prevent landlords from letting to those who are out of work or on benefits, or hike premiums for landlords who do so (Crook et al, 2009; Beatty et al, 2014; Wallace and Rugg, 2014; Reeve et al, 2016). According to research by mortgage broker 3mc reported in The Times (but not publicly accessible) as many as two thirds of lenders do not accept applications from landlords letting to those in receipt of state support (Ellson, 2017, see also Dyson, 2014). According to Clarke et al’s (2015) survey of 200 landlords, of those who preferred not to let to tenants in receipt of HB (127), only one in ten cited insurance restrictions as a reason for this, and 6% mortgage provider restrictions. These factors do not then appear to be as influential in driving landlord reluctance as those relating to welfare reform and administration discussed above, and it is clear that despite the policies of some lenders and mortgage providers, other sections of the market remain open to those wishing to be able to let to this group.

¹⁴ *These findings chime with a number of homelessness-related trends, particularly in England, namely; the striking increase in statutory homelessness acceptances resulting from the ending of private rented tendencies (up from 11% of acceptances in 2009/10 to 31% in 2015/16) and the significant fall (of 30% since 2009/10) in the proportion of prevention activity involving helping people access private tenants (Fitzpatrick et al, 2017).*

¹⁵ *Including poorer quality PRS stock, increasing mobility in the PRS, evictions, homelessness, child poverty, fuel poverty, overcrowding (with health impacts), and community breakdown (see Gibb et al, 2014)*

Broader issues impacting the overall profitability of private renting have also been linked to landlords' willingness to let to those in receipt of Housing Benefit, in that squeezes on profitability will encourage maximisation of rental returns and letting to the most lucrative groups. Relevant in this regard are the tax changes to Buy-to-Let landlords announced in the 2015 Summer Budget: tax relief on landlords' mortgage interest payments are to be reduced from 2017 onwards. An NLA members' survey reports that six in ten landlords will have their profitability reduced by such a measure, with one in five saying they will prioritise other tenants over 'riskier' candidates, including those in receipt of HB (NLA, 2016; see also Collinson, 2015; Pattison and Reeve, 2017). A CityLets (2015) survey of 500 Scottish landlords found that 30% of landlords were considering leaving the sector in the future, 17% were likely to decrease properties and 17% were likely to leave altogether. In Reeve et al's (2016) landlord survey, 40% of landlords cited this as a cause of greater reluctance to let to people receiving HB/LHA or UC.

One factor unique to Scotland concerns the impact on landlords of the Private Housing (Tenancies) (Scotland) Act, which restricts the grounds that landlords can use for eviction, introduces the possibility of rent caps in highly pressured areas, and introduces a standard tenancy. Direct links between the Act and landlords' willingness to let to those in receipt of Housing Benefit appear not to have been made, but landlord surveys have suggested that the Act may lead to landlord disinvestment. According to a survey of 1,700 Scottish landlords in May 2015, two-thirds said they would 'likely dis-invest if rent controls were imposed' (PRS 4 Scotland, 2015). CityLets' (2015) survey found that if the 'no fault' ground for eviction was removed, substantial proportions of landlords would consider leaving the sector (39%), likely decrease their properties (20%) or be likely to leave altogether (17%), with the proposal to cap rent increases at CPI plus 1% yielding similar results. Cookson (2015) explained that:

“there are serious concerns within the sector that a single Scottish tenancy, with potential introduction of rent controls, as well as the removal of the so-called ‘no fault’ ground, will create a market place that is less flexible and adaptable to the varied needs of both tenants, landlords and investors.”

Crook et al (2009) found that perceived difficulties regaining possession were an issue for some landlords well in advance of this strengthening of tenants' rights, and incentivised them to avoid 'troublesome tenants' as far as they could, an approach that may lead to those in receipt of HB being excluded.

A further possible future influence on landlord practice is the introduction of requirements on landlords to check the immigration status of prospective and current tenants. These 'right to rent' changes introduced in the 2016 Immigration Act are not yet in force in Scotland, but are expected to be rolled out, and there are fears that the new rules will encourage widespread discrimination against prospective tenants who do not 'look British' (Crawford, et al, 2016). Around half of landlords (in an English/Scottish sample) cited this as a cause of greater reluctance to let to people receiving HB/LHA or UC (Reeve et al, 2016)

To sum up, this section has reviewed evidence on the drivers underpinning a significant proportion of landlords' reluctance or unwillingness to let to tenants in receipt of Housing Benefit. A number of interrelated factors are relevant, including:

- landlord beliefs about benefit claimants (likely based on a combination of past bad experiences and negative views reflecting broader stigma towards this group);
- material disincentives relating to *how* Housing Benefit, LHA and UC are paid and *the level at which* they are paid;
- mortgage and insurance provider restrictions or premiums; and
- other regulatory and financial factors squeezing the profitability of private renting and incentivising landlords to pursue more lucrative letting strategies or disinvest from the sector.

The relative importance of these factors is hard to definitively judge on the available evidence, though certain factors (e.g. mortgage and insurer restrictions) though important, appear to be less central to landlords' reasoning

than others (e.g. concern regarding direct payments). Nor are the actual impacts on landlord behaviour and practice straightforward to predict. They will almost certainly be slower and less dramatic than surveys exploring landlord intentions and reactions to policy developments predict. Even so, further, even marginal, ramping up of preferences against HB tenants may nevertheless have significant implications for poorer households.

Several landlord surveys (covered in the analysis above) allow for a comparison of the relative importance of different factors, albeit using different categories of drivers:

- According to Wallace and Rugg's (2014) analysis of the 2009/10 EHS-PLS data, the three most critical factors for individual landlords are concerns regarding unpaid rent, delays in payment, and anti-social behaviour.
- Clarke et al's (2015) smaller scale survey of English landlords suggests that 'higher risk of getting a difficult tenant', 'higher risk of tenants not paying rent' and 'past bad experience with tenants on Housing Benefit' are the three most important drivers.
- Most recently, Reeve et al's (2016) analysis of a survey of around 1,000 landlords in England and Scotland identified 'direct payment of UC housing costs to claimants rather than the landlord', 'caps in Local Housing Allowance' and the 'Four year freeze on HB payments to working age claimants' as the three top drivers of landlord reluctance respectively.

These findings, alongside the analysis above, suggest the increasing centrality of the post-2010 welfare reform programme in driving increasing landlord reluctance to let to those in receipt of HB, in a context where landlord preferences were already substantially limiting this group's access to the tenure. These pre-existing preferences are best understood as the combined result of societal attitudes to those in receipt of state support and longstanding issues with the administration and design of housing allowances in the UK.

4 IMPROVING BENEFIT RECIPIENT ACCESS TO THE PRS

Against this evidential backdrop, this chapter considers the means by which landlord and letting agent willingness to let to those in receipt of Housing Benefit might be increased. Changing landlord and letting agent attitudes, beliefs and practice in this direction could be pursued in a number of different ways, including via legal/regulatory means, incentives/enabling efforts, or changes to the context in which landlords/letting agents operate. Robust and substantial impacts are likely to require action across these kinds of interventions.

One option is to follow Belgium and Ireland in making selection of tenants on the basis of their source of income an illegal form of discrimination in Scotland, subject to enforcement via the courts and sanction of fines. Exactly how this would be achieved is not straightforward. The Equalities Act 2010 remains reserved, though Scottish Government do have flexibilities to extend equalities law in various ways, including in relation to socio-economic rights. In 2016, Naomi Eisenstadt (Independent Advisor to the Scottish Government on Poverty and Inequality) called for the socio-economic duty in the Equalities Act to be commenced in Scotland as soon as possible, a development which could offer a means of exploring landlord practice through the lens of socio-economic equality (Eisenstadt, 2016). In addition to these practical considerations, the impacts of taking such a step would need to be considered comprehensively, including via assessment of the impacts of legal change in other countries. In Belgium and Ireland, legal change has not eliminated discrimination against tenants, but is likely to have dramatically reduced 'No DSS' provisions in PRS advertisements. It is likely that the effectiveness of legal change would be enhanced if introduced alongside effective enforcement structures and wider policy changes addressing the underlying causes of landlord reluctance to let to those in receipt of benefits. Particular caution is required in the current UK context, where landlords' willingness to let to this group has been negatively impacted by the increasingly low levels of support available through Housing Benefit and substantial gaps in some areas between market rents and LHA levels. Negative unintended consequences, including discouraging landlord investment or encouraging landlord disinvestment¹⁶, might be considered particularly likely in such a context.

Enhancing regulatory measures affecting the PRS may offer some routes to improving HB recipient access to the tenure. Established processes around compulsory landlord - and from 2018 letting agent - registration in Scotland could be used to influence landlord practice. Under new legislation, letting agents are required to abide by a Code of Practice¹⁷ and meet a minimum set of training requirements. The Code of Practice includes provisions requiring landlords to not unlawfully discriminate against tenants or prospective tenants on the basis of age, disability, sex, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief or sexual orientation, including in relation to advertising properties and conducting viewings. Consideration should be given to extending these codes (and associated letting agent training) to cover selection against those in receipt of benefits, and in particular encouraging letting agent reflection on whether financial checks used to screen prospective tenants strike an appropriate balance between safeguarding landlords' interests and enabling reasonable access for lower income households.

Requirements linked to landlord registration could also be considered. In Wales, for instance, landlords are now required to register and comply with a code of practice¹⁸ (though this code includes no obligations in relation to letting to benefit recipients). Though no equivalent currently exists in Scotland, there are provisions for Ministers to introduce a letting code of practice applicable to landlords under the Antisocial Behaviour etc. (Scotland) Act 2004¹⁹. Some Scottish landlords are voluntarily signed up to sector Codes of Practice, namely, if they are members

¹⁶ *Albeit with the caveats above borne in mind regarding the translation of landlord intentions into actual impacts.*

¹⁷ See <http://www.legislation.gov.uk/ssi/2016/133/contents/made>

¹⁸ See <http://gov.wales/topics/housing-and-regeneration/housing-supply/renting/privately/landlord-and-agent-registration/rent-smart-code-of-practice/?lang=en>

¹⁹ See <http://www.legislation.gov.uk/asp/2004/8/section/92A>

of the Scottish Association of Landlords²⁰ or are accredited through Landlord Accreditation Scotland²¹. The latter of these codes asks landlords to commit to not discriminating against tenants or prospective tenants because they are entitled to housing or other benefits. Encouraging landlords to seek accreditation, and encouraging other sector bodies like the SAL to adopt higher standards in this area, may pay some dividends in improving landlord practice.

In their recent consideration of PRS regulation, Moore and Dunning (2017) describe a shift from traditional 'command and control' approaches (Government-led legal change) that dominated until the 1980s, to risk management strategies that target resources on actors most likely to be non-compliant, and methods of 'smart regulation' that blend regulatory techniques, with sector (i.e. landlord and letting agent) participation on regulatory processes. The emphasis here is on creating a 'culture of compliance', which can involve the use of incentives, and *"in the most difficult or severe cases, where efforts to encourage compliance through education, training and standard-setting have failed"* (p. 6), sanctions. Endorsement of the principles of 'smart regulation' would imply that any focus on legal and regulatory change should (at least) go alongside 'softer' educative, awareness raising, and persuasive techniques seeking to influence landlord behaviour, and that sanctions and enforcement should only be used in areas where significant unwillingness to accommodate HB recipients is impacting on this group's housing options detrimentally, and among sub-groups of landlords known to be likely to be unwilling to let to this group.

Various forms of targeting are suggested by the evidence reviewed here, in particular, targeting interventions in higher-demand, higher-pressure housing markets where landlords are more likely to disfavour those in receipt of benefit in favour of other prospective tenants. This might be particularly valuable for tenants seeking to move into work, given that higher demand in the rental market is likely to be associated with greater employment opportunities (as well as access to infrastructure more generally). Efforts could also be targeted given evidence regarding which PRS market players are least likely to let to those in receipt of benefits, in particular, individual landlords (the majority of Scottish landlords in any case), landlords with smaller portfolios, and mainstream letting agents. It might cautiously be argued that there is a progressive case for wider efforts to support large-scale institutional investment in the PRS, but only where such investment is geared towards (or at least designed from the outset not to exclude) those in receipt of benefit. It is not at all clear that institutional investors will be interested in providing for this submarket, however, with the drivers discussed in chapter 3 highly pertinent to their business plans and letting strategies. Indeed, there have been calls from the development industry for Scottish Government to relax affordable housing contribution requirements for build to rent schemes (Battye, 2017).

The principles of 'smart regulation' also suggest a focus on enabling and encouraging rather enforcing the behaviours sought. A number of approaches would help achieve this aim (see Reeve et al, 2016), including:

- Working to reduce barriers associated with insurance and Buy to Let mortgage providers' premiums and restrictions. Wallace and Rugg (2014) suggest that it is landlord skills in managing benefit recipient tenancies that should be subject to lender consideration, rather than blanket exclusions of this group. The RLA have called for a government review of lender practice in this area (Ellson, 2017);
- Reversing tax changes squeezing landlord profitability, and/or offering tax incentives to landlords accommodating those in receipt of benefit (see Moore and Dunning, 2017);
- In cases where landlords receive direct payments, removing liability for rent overpayments; and
- Introducing government liability for property damage or rent arrears where the tenant is in receipt of LHA/HB/UC.

²⁰ See <https://www.scottishlandlords.com/About/SALCodeofPractice.aspx>

²¹ See <http://www.landlordaccreditationscotland.com/wp-content/uploads/Scottish-Core-Standards-for-Accredited-Landlords-Agents.pdf>

Also relevant is ensuring that private tenants in need of support (e.g. with budgeting skills, tenancy management etc.) receive it, something that Scottish landlords have reportedly had bad experiences of (Crook et al, 2009) and which may be particularly relevant given cuts to local authority and housing support budgets in recent years. A further consideration of central importance is ensuring the effective administration of rent support payments, in the short term in local authorities administering Housing Benefit, and crucially, in the longer term ensuring effective, responsive, accurate central administration of the housing cost element of Universal Credit.

Several additional kinds of enabling intervention have received considerable attention as means of ensuring PRS access for vulnerable, low income and/or benefit claiming households, namely PRS Access Schemes, which support vulnerable households to access and sustain PRS tenancies via support to the tenant (financial and personal; pre and during tenancy) and landlord (e.g. rent deposit bonds); and Rent Deposit Guarantee schemes which provide a written bond (to cover arrears or property damage) to landlords for tenants who cannot afford it themselves. Though such interventions appear to be fairly widely (although not universally) available (Reeve et al, 2016), a core challenge has been declining opportunities for grant or state funding (Gousy, 2016; Shelter, 2017). This has led for calls for more state support for PRS Access Schemes and government underwritten bond guarantees for landlords letting to homeless (or other vulnerable) tenants (Gousy, 2016). Though Crook et al (2009) found 'much reservation' among Scottish landlords about any such scheme associated with scepticism that funds owed would be paid promptly, these schemes nevertheless received endorsement from Scottish Government in their PRS review (2009).

'Social' or 'Local Lettings Agencies' (not-for-profit organisations run by local authorities, other public bodies, housing associations or charities) also seek to enable access to the PRS for groups who usually struggle to access the tenure, and seek to be self-financing via income generating mechanisms that offset the need for external funding (Shelter Scotland, 2015). Social Lettings Agencies appear to operate in less than a quarter (23%) of English local authority areas, though are more common in London and the South than in the North and Midlands²². According to Shelter Scotland (2015), they are less established north of the border due to a more 'benign' housing market context and smaller private rented sector.

There are then considerable opportunities for Scottish Government, local authorities and/or other key players to support and scale PRS Access Schemes, Rent Deposit Guarantee Schemes and Social Lettings Agencies as a means of enhancing benefit claimants' access to the tenure. Two key considerations here would be ensuring the financial viability and sustainability of such schemes, and achieving an attractive offer for landlords that nevertheless avoids the pitfalls of 'incentives inflation' that would fuel increasing cost of ensuring benefit claimants can access PRS accommodation (Rugg and Rhodes, 2008). This could take the form of a national programme to fund PRS Access Schemes, such as England's Private Rented Sector Access Development Programme (Rugg, 2014), or a state-backed deposit guarantee scheme (Rugg and Rhodes, 2008; Gousy, 2016). Shelter (2017) have called for a fundamental review of tenancy deposits, and consideration of online, transferable deposits, which can be paid in instalments by tenants. They have also proposed an expansion of benefit advances to help benefit recipients to meet the front-loaded cost of PRS tenancies.

Scaling up Social Lettings Agencies could involve improving the offer from such schemes so that Social Lettings Agencies become a genuine mainstream alternative to commercial lettings agencies. This might involve statutory backing of such agencies and linking landlord engagement to particular benefits (e.g. see Craigforth, 2009), for instance, access to low cost loans to address property maintenance and repair issues, or access to 'trusted partner' status enabling landlords to receive direct rent payments under Universal Credit (Shelter, 2017). Such incentives could more broadly be used to support growth of 'good practice' landlords in the PRS already letting and managing good quality homes to those in receipt of benefits. It is of course highly likely that a large proportion of landlords will continue to use commercial letting agents in the future, which suggests that working with letting

²² These figures are sourced from a survey of English local authorities conducted in Summer 2016 by Suzanne Fitzpatrick and colleagues for Crisis/The Joseph Rowntree Foundation as part of the Homelessness Monitors research programme. The survey achieved a response rate of 50% (162 local authorities).

agents to influence their own practice, and the practice of landlords on their books should also be part of efforts to address limited access to the tenure for those in receipt of benefits.

Effective efforts to improve benefit recipient access to the PRS would have to involve as a core priority attention to a wider policy context that is, intentionally or not, highly hostile to this objective (Wallace and Rugg, 2014; Reeve et al, 2016). It is unlikely that any of the interventions considered in this chapter would be effective in a context where benefit payments do not adequately cover market rental costs. Research with landlords indicates common acceptance of a degree of social responsibility, but only in so far as this can be realised in line with their business interests. The Westminster-led welfare reform programme detailed above, however, has dramatically reduced the capacity of those in receipt of Housing Benefit to afford PRS tenancies, fuelling the view that letting to this group is a high-risk strategy for landlords (Beatty et al, 2014). Even the most socially conscious of landlords are unlikely to be willing to let to benefit recipients where the financial support available is out of step with market rents, either due to high local rent levels or because the group (e.g. under 35s, see Pattison and Reeve, 2017) are entitled to very low levels of support.

The impacts of these welfare policy factors in discouraging lets to those in receipt of benefits is likely to be less severe in Scotland than elsewhere in the UK given Scottish Government's commitment to maintain flexibility for tenants receiving Universal Credit regarding how often and to whom rent is paid, and to mitigate cuts incorporated in UC (e.g. to some 18-21 year olds). Enabling rent to be paid direct to landlords has been identified as the primary means of ensuring continued willingness to let to this group (Reeve et al, 2016). But the scale of the difference these Scottish variations will make is not clear, and will depend on the market context in which landlords operate (how readily they are able to let to other groups), landlords' understanding of how Universal Credit works in Scotland, and the administration of UC.

Further consideration should be given to whether Scotland's current limited devolved powers in relation to social security policy (Wane et al, 2016) could be used to address these concerns and enhance benefit recipient access to the PRS, so too any future further devolution of relevant powers (Stephens et al, 2015). Devolved powers over Discretionary Housing Payments, powers to top-up reserved benefits, and to vary the housing cost element of Universal Credit for rented accommodation (Wane et al, 2016) are particularly relevant, and give Scottish Government further latitude than has yet been employed (e.g. around direct payments and frequency of payments) in addressing the concerns outlined in this report.

5 CONCLUSIONS

As the impacts of welfare reform collide with increasingly well-developed Scottish housing policy – and now developing social security policies – it is timely to consider how Scotland’s PRS (the only growing housing tenure) can be supported to play an effective role in providing affordable, decent accommodation for those in receipt of benefits. The focus here has been on landlord and letting agent attitudes and practices towards this group and the drivers of those attitudes and practices.

Given limited available evidence speaking directly to Scottish landlords and letting agents, this review has relied heavily on evidence from the wider UK (and in some instances, further afield). This wider evidence base paints a clear picture of a high proportion of landlords either preferring not to (around two thirds of landlords) or being entirely unwilling to (often over half) house those in receipt of Housing Benefit. Despite important caveats around the likely impacts of this set of attitudes (e.g. landlords may not accurately know whether prospective/current tenants are in receipt of benefit and may not be able to realise their conscious letting strategies and preferences in practice), it is evident from research on tenants’ experiences that these factors provide a significant material barrier to tenants’ access to decent, affordable PRS accommodation where they wish to live. Evidence available directly regarding the state of play in Scotland largely echoes this picture. Though several sources indicate a somewhat lower proportion of landlords expressing preferences against letting to those in receipt of benefits in Scotland, the best sources of evidence (Crook et al, 2009; Beatty et al, 2014) suggest similar levels of preference against letting to this group. Since Crook et al (2009) found that over two thirds of Scottish landlords prefer not to let to those who receive Housing Benefit, major contextual changes have occurred that have plausibly hardened landlord attitudes to letting to this group.

Consideration of the drivers of these attitudes reveals a longer-term backdrop of negative landlord attitudes to housing those in receipt of Housing Benefit, combining with a recent context of policy change that has fuelled legitimate landlord concern that letting to this group is an increasingly high-risk strategy. Landlords considering letting to this group now face the prospect of payments more often going direct to the tenant, with tenants required to pass on rent payments to the landlord, but in a context where their incomes are increasingly constrained and market rents in many areas rising, both in absolute terms and in particular as compared to LHA rates. As a consequence, landlords face a market context in which letting to this group is treated as high risk by both letting agents and credit checkers considering the ability of prospective tenants to pay the rent, and by mortgage lenders concerned to ensure that landlords receive rent payment facilitating their mortgage debt. It is in this climate that Westminster-led welfare policies are increasingly seen to compound rather than mitigate the difficulties facing benefit claimants seeking to enter the private market (Reeve et al, 2016; Wallace and Rugg, 2014).

Altering this policy context to be more conducive to landlords deciding to let to this group should certainly be a key focus of any efforts to improve benefit recipient access to the PRS. Scotland’s increasing (although still heavily constrained) legislative powers in this area, and early action to alter the operation of Universal Credit in Scotland (concerning direct payments to landlords in particular), are thus extremely welcome. A range of other policy options have also been considered here. Legislation making selection on the basis of income source illegal would constitute a hard line against landlord practice, and though this could potentially be seen as a high-risk option that may discourage landlord investment in the PRS, there is precedence in other European countries for such a move (Heylen and Van den Broeck, 2016; Moore and Dunning, 2017). Further research on the impacts – and in particular landlord experiences – of this move in Belgium and Ireland might usefully inform future consideration of such reform in Scotland, so too consideration of the form such legislation could take in order to best balance the aim of improving PRS access with genuine landlord concerns about tenants’ ability to pay.

‘Softer’ and lower risk policy changes offer additional options for addressing landlord practice in this area. There is clear scope for current regulatory practice to be reviewed and enhanced with specific attention given to increasing the willingness of landlords and letting agents to let to those in receipt of Housing Benefit. For instance, provisions in this area could be added to relevant codes of practice, and efforts made to encourage/incentivise landlord

accreditation, which in Scotland already includes codes preventing landlord discrimination against those in receipt of benefits. Engagement with other market players – insurance providers and lenders – should also be considered to reduce the barriers facing benefit recipient households seeking PRS accommodation. This could range from lobbying efforts seeking to encourage them to change their practice, to firmer government-led intervention prohibiting anti-HB recipient practice by these players.

A further intervention option is to scale and enhance the offer of PRS Access Schemes, Rent Deposit Schemes and Social Lettings Agencies. These kinds of intervention, though demonstrated to be cost effective, have uneven presence geographically and have struggled to scale in the face of funding/financial sustainability challenges. Scottish Government-led backing for such schemes could support a step change in their capacity to access and target landlords, and in the case of Social Lettings Agencies, compete with commercial lettings agents, in particular, through the offer of meaningful incentives to landlords, such as access to loans or ‘trusted partner’ status. Scaling of such interventions should however go alongside engagement with the commercial mainstream PRS market with which many landlords will continue to engage. Evidence considered here suggests for instance that fairly minor tweaks to letting agent tenant credit checks could enhance access for this group.

While the wider-UK context is thus relatively bleak as regards the direction of policy travel compounding pre-existing landlord reluctance to let to those in receipt of Housing Benefit, Scotland is uniquely placed to bring a number of strategies to bear in ensuring the PRS can play an increasingly effective role in accommodating lower income households in receipt of Housing Benefit.

REFERENCES

- Adcock, A. and Wilson, W. (2016) *Can Private Landlords Refuse to Let to Housing Benefit Claimants?* London: House of Commons Library.
- Barnes, S. (2016) 'Scottish Government announces rental income guarantee scheme', *Inside Housing*, 15th December <http://www.insidehousing.co.uk/scottish-government-announces-rental-income-guarantee-scheme/7018095.article>
- Battye, J. (2017) 'Getting build to rent off the ground shouldn't mean ditching affordable housing requirements', *Shelter Scotland blog*, 22nd February <http://blog.scotland.shelter.org.uk/2017/02/22/getting-build-to-rent-off-the-ground-shouldnt-mean-ditching-affordable-housing-requirements/>
- Baumberg, B. (2016) The stigma of claiming benefits: a quantitative study, *Journal of Social Policy*, 45(2), pp.181-199.
- BBC (2017) 'No DSS: Most flat shares refuse benefit claimants', BBC News, 9th March <http://www.bbc.co.uk/news/uk-england-39102860>
- Beatty, C., Cole, I., Kemp, P., Marshall, B., Powell, R. and Wilson, I. (2012) *Monitoring the Impact of Changes to the Local Housing Allowance System of Housing Benefit: Summary of early findings*. London: Department for Work and Pensions.
- Beatty, C., Cole, I., Powell, R., and Sanderson, E. (2014) *Monitoring the impact of recent measures affecting Housing Benefit and Local Housing Allowances in the private rented sector: The response of landlords* (Research Report No. 870). London: Department for Work and Pensions.
- Beatty, C. and Fothergil, S. (2016) *The Uneven Impact of Welfare reform - The financial losses to places and people*. Sheffield: CRESR.
- Butler, P. and Asthana, A. (2017) 'Universal credit flaws pushing claimants towards debt and eviction', *The Guardian*, 7th February <https://www.theguardian.com/society/2017/feb/07/universal-credit-flaws-pushing-claimants-towards-debt-and-eviction-warning>
- Clarke, A., Morris, S. and Williams, P. (2015) *How Do Landlords Address Poverty. A Poverty-Focused Review of the Strategies of Local Authorities, Landlords and Letting Agents in England*. York: JRF.
- CityLets (2015) *Scottish Landlord Survey Oct 2015*. <https://www.citylets.co.uk/downloads/survey-charts/oct-2015/citylets-scottish-landlord-survey-october-2015.pdf>
- Cole, I., Pattison, B. and Reeve, K. (2015) *The Withdrawal of Support for Housing Costs Under Universal Credit for Young People: More Pain For Little Gain?* London: Crisis
- Cole, I., Powell, R. and Sanderson, E. (2016) Putting the Squeeze on "Generation Rent": Housing Benefit Claimants in the Private Rented Sector - Transitions, Marginality and Stigmatisation, *Sociological Research Online*, 21(2), pp. 1-14.
- Collinson, P. (2015) 'The housing market is broken – people need help to rent, let alone buy', *The Guardian*, 25th November <https://www.theguardian.com/business/2015/nov/25/the-housing-market-is-broken-people-need-help-to-rent-let-alone-buy>
- Cookson, D. (2015) 'Scotland's private rental sector in detail', *The Scotsman*, 29th September <http://www.scotsman.com/business/companies/dan-cookson-scotland-s-private-rental-sector-in-detail-1-3900822>

-
- Crawford, J., Leahy, S. and McKee, K. (2016) The Immigration Act and the 'Right to Rent': Exploring Governing Tensions Within and Beyond the State. *People, Place and Policy*, 10(2), pp. 114-125.
- Craigforth (2009) *Good Practice Resource Pack for Working with Private Landlords*. Scotland: Scottish Government Social Research.
- Crisis (2011) *Scottish Landlords' Survey On Letting to Tenants through Deposit Guarantee Schemes*, London: Crisis
- Crook, A. D. H. and Kemp, P.A. (1996) The Revival of Private Rented Housing in Britain, *Housing Studies*, 11(1), pp. 51-68.
- Crook, A. D. H., Kemp, P. and Ferrari, E. (2009) *Views and Experiences of Landlords in the Private Rented Sector*. Edinburgh: Scottish Government
- Deegan, G (2017) 'Estate agent fined €1,500 over 'no rent allowance' policy', *The Irish Times*, 21st March <http://www.irishtimes.com/news/social-affairs/estate-agent-fined-1-500-over-no-rent-allowance-policy-1.3019139>
- Dyson, R. (2014) 'Why landlords are shunning profitable benefit tenants', *The Telegraph*, 14th January <http://www.telegraph.co.uk/finance/personalfinance/investing/buy-to-let/10563064/Why-buy-to-let-landlords-are-shunning-profitable-benefit-tenants.html>
- Eisenstadt, N. (2016) *Shifting the Curve: A Report to the First Minister*. Edinburgh: Scottish Government.
- Ellson, A. (2017) 'Renters on Housing Benefit barred from buy-to-let homes', *The Times*, 1st May <https://www.thetimes.co.uk/edition/news/renters-on-housing-benefit-barred-from-buy-to-let-homes-cw0qcw9cq>
- Fitzpatrick, S, Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2015) *The Homelessness Monitor 2015: Scotland*. London: Crisis.
- Fitzpatrick, S, Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2017) *The Homelessness Monitor: England 2017*. London: Crisis
- Gibb, K., Sprigings, N., Wright, S. and McNulty, D. (2014) *Evidence Review of the Impacts of UK Welfare Reform Affecting Housing in Scotland*. Edinburgh: Scottish Government.
- Gousy, H. (2016) *Home - No Less Will Do: Improving Access to Private Renting for Single Homeless People*. London: Crisis
- Heylen, K. and Van den Broeck, K. (2016) Discrimination and selection in the Belgian private rental market, *Housing Studies*, 31(2), pp. 223-236.
- Hickman, P., Reeve, K., Wilson, I., Green, S., Dayson, C. and Kemp, P. (2014) *Direct Payment Demonstration Projects: 12 Month Stage Reports*. London: Department for Work and Pensions
- Home Office (2016) *Right to Rent Code of Practice*. London: Home Office.
- House of Commons Communities and Local Government Committee (2016) *Homelessness - Third Report of Session 2016–17*. London: House of Commons.
- Irish Human Rights and Equalities Commission (2016) *Important Changes to Equality Law for the Rental Market: Information for Landlords, Letting Agents and Property Advertisers*. https://www.ihrec.ie/download/pdf/important_changes_to_equality_law_for_rental_market.pdf
- Johnston, A. (2015) *Role of the Private Rented Sector in Meeting Housing Need in Glasgow - Final Research Report October 2015*. Glasgow: Glasgow City Council.

-
- Kemp, P., Beatty, C., Cole, I. and Foden, M. (2014) *Monitoring the Impact of Recent Measures Affecting Housing Benefit and Local Housing Allowances in the Private Rented Sector: The Response of Tenants*. DWP Research Report No. 872. London: Department for Work and Pensions.
- Landlord Accreditation Scotland (2011) Scottish Core Standards for Accredited Landlords. <http://www.landlordaccreditationscotland.com/wp-content/uploads/Scottish-Core-Standards-for-Accredited-Landlords-Agents.pdf>
- Lees, F. and Boyle, J. (2011) *Evaluation of the Impact and Operation of Landlord Registration in Scotland*. Edinburgh: Scottish Government.
- Lunn, E (2014) 'Buy-to-let property supremo shuts door on Housing Benefit tenants', *The Guardian*, 4th January <https://www.theguardian.com/money/2014/jan/04/buy-to-let-landlord-evicts-housing-benefit-tenants>
- Kenway, P., Bushe, S., Tinson, A. and Born, T.B. (2015) *Monitoring Poverty and Social Exclusion in Scotland 2015*. York: JRF.
- McKee, K., Muir, J., and Moore, T. (2017) Housing policy in the UK: the importance of spatial nuance, *Housing Studies*, 32(1), pp. 60-72.
- McLachlan, A. (2006) *Edinburgh's Private Sector Leasing Scheme*. http://scotland.shelter.org.uk/__data/assets/pdf_file/0016/23191/Edinburgh20PSL20scheme.pdf
- Minihan, M. (2015) 'Government moving to end rent supplement tenant "discrimination"', *The Irish Times*, 19th February <http://www.irishtimes.com/news/politics/government-moving-to-end-rent-supplement-tenant-discrimination-1.2109650>
- Moore, T. (2017) The convergence, divergence and changing geography of regulation in the UK's private rented sector, *International Journal of Housing Policy*, pp.1-13. DOI: 10.1080/19491247.2017.1312795
- Moore, T. and Dunning, R. (2017) *Regulation of the Private Rented Sector in England Using Lessons from Ireland*. York: JRF.
- NLA (2016) 'Benefit tenants set to lose out in race for private rented homes', *National Landlords Association*, 26th May <https://landlords.org.uk/news-campaigns/news/benefit-tenants-set-lose-out-in-race-private-rented-homes>
- NLA (2013) 'Landlords exit Local Housing Allowance market', *National Landlords Association*, 30th July <https://www.landlords.org.uk/news-campaigns/news/landlords-exit-local-housing-allowance-market>
- Office for Budget Responsibility (2017) *Economic and Fiscal Outlook*. <http://cdn.budgetresponsibility.org.uk/March2017EFO-231.pdf>
- O'Regan, M. (2015) 'Landlords are to face €15k fine for refusing rent allowance tenants', *Independent.ie*, 28th September <http://www.independent.ie/business/personal-finance/property-mortgages/landlords-are-to-face-15k-fine-for-refusing-rent-allowance-tenants-31563485.html>
- Osborne, H (2014) 'More landlords turn away Housing Benefit claimants', *The Guardian*, 21st January <https://www.theguardian.com/money/2014/jan/21/landlords-turn-away-housing-benefit-claimants>
- Pattison, B. and Reeve, K. (2017) *Access to Homes for Under-35's: The Impact of Welfare Reform on Private Renting*. Sheffield: CRESR.
- PRS 4 Scotland (2015) *The Scottish Housing Sector: Increasing Demand vs Diminishing Supply*. <http://www.prs.scot/research-home/>
- Reeve, K., Cole, I., Batty, E., Foden, M., Green, S. and Pattison, B. (2016) *Home - No Less Will Do: Homeless People's Access to the Private Rented Sector*. London: Crisis.

Rhodes, D. and Bevan, M. (2010) *Private landlords and the Local Housing Allowance system of Housing Benefit*, London: Department for Work and Pensions.

Rugg, J. and Rhodes, D. (2008) *The Private Rented Sector: its Contribution and Potential*. York, Centre for Housing Policy.

Rugg, J. (2014) *Crisis Private Rented Sector Access Development Programme: Year Two to April 2013*. York: University of York.

RLA (2016) Written Evidence submitted by the Residential Landlord's Association [HOL 111] to Housing of Commons Communities and Local Government Committee Homelessness inquiry. http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/communities-and-local-government-committee/homelessness/written/28538.html#_ftnref14

Scanlon, K. and Whitehead, C. (2016) *The Profile of UK Private Landlords*, London: CML.

SAL(2014) *Your Views Counted: Member Survey Results*. <https://www.scottishlandlords.com/LinkClick.aspx?fileticket=x-MaxudHI3M%3D&tabid=432>

Scottish Government (2009) *Scottish Government Review of the Private Rented Sector. Volume 1 - Key Findings and Policy Implications*. Edinburgh: Scottish Government.

Scottish Government (2015) *Scotland's People Annual Report: Results from 2014 Scottish Household Survey*. Edinburgh: Scottish Government.

Scottish Government (2016) *Rental Income Guarantee Scheme Support for New Purpose Build-to-Rent Private Rented Housing in Scotland*, Edinburgh: Scottish Government.

Scottish Government (2017) *Scotland's People Annual Report: Results from the 2016 Scottish Household Survey (and associated publication tables)*. Edinburgh: Scottish Government.

Scottish Government (2017a) *Social Security (Scotland) Bill Policy Memorandum*. Edinburgh: Scottish Government.

Scottish Government (2017b) *Consultation on Universal Credit (Claims and Payments) (Scotland) Regulations 2017*, Edinburgh: Scottish Government.

Shelter (2006) *The Path to Success? Shelter's Research on Housing Benefit reform: the Final Report*. London: Shelter.

Shelter (2009) *Local Housing Allowance and Direct Payments - Giving Claimants a Choice*. London: Shelter.

Shelter (2016) *Survey of Private Landlords*. London: Shelter.

Shelter (2017) *Shut out: The barriers low-income households face in private renting*. London: Shelter.

St Basils (2016) *Written Evidence Submitted by St Basil's [HOL 21] to the Housing of Commons Communities and Local Government Committee Homelessness inquiry*. <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/communities-and-local-government-committee/homelessness/written/28249.html>

Stephens, M., Leishman, C., Bramley, G., Ferrari, E. and Rae, A. (2014) *What Will the Housing Market Look Like in 2040?* York: JRF

Stephens, M., Blenkinsopp, J., & Gibb, K. (2015) *The Devolution of Housing Benefit and Social Security: Rebalancing Housing Subsidies in Scotland*. Edinburgh: Shelter Scotland.

-
- Trevillion, E. and Cookson, D. (2016) *Demand Patterns in the Private Rented Sector in Scotland - Time to Commit to Residential Investment?* Edinburgh: Homes for Scotland.
- Wallace, A. and Rugg, J. (2014) *Buy-to-let Mortgage Arrears: Understanding the Factors that Influence Landlords' Mortgage Debt*. York: Centre for Housing Policy.
- Wane, K., Berry, K., Kidner, C. and Georghiou, N. (2016) *New Social Security Powers*. SPICEe: Edinburgh.
- Who Benefits? (2014) "Second Class Citizens"? *The Personal Impact of the Public Debate on Benefits*. http://b3cdn.net/smallaxelive/4b2948363ed6763c54_w0m6i2it0.pdf
- Wilcox, S., Rhodes, D. and Rugg, J. (2008) *Local Housing Allowance Final Evaluation: The Housing and Labour Market Impacts of the Local Housing Allowance*. London: Department for Work and Pensions.
- Wilcox, S., Perry, J., Stephens, M. and Williams, P. (2017) *UK Housing Review 2017: Compendium Table 17a and b*. <http://www.ukhousingreview.org.uk/ukhr17/compendium.html>
- Wilson, W. (2013) *Paying Local Housing Allowance Direct to Tenants in Private Rented Housing*. London: House of Commons Library.
- Work and Pensions Committee (2013) *House of Commons Work and Pensions Committee - Support for Housing Costs in the Reformed Welfare System - Fourth Report of Session 2013–14*. London: House of Commons.

Shelter Scotland helps over half a million people every year struggling with bad housing or homelessness through our advice, support and legal services. And we campaign to make sure that, one day, no-one will have to turn to us for help.

We're here so no-one has to fight bad housing or homelessness on their own.

Please support us at **shelterscotland.org**

Registered charity in England and Wales (263710) and in Scotland (SC002327)

Shelter Scotland
Scotiabank House
6 South Charlotte Street
Edinburgh EH2 4AW
shelterscotland.org

Shelter
Scotland