



## **Private Rented Sector**

# **Glasgow Tenant-Led Housing Commission Report**

**August 2022**

Your experts in housing, community development, and engagement practice. We are committed to influencing change and strive for an active, inclusive, and just Scotland with strong, equitable, and sustainable communities.

**Our aim is simple, we want to change housing in Scotland for the better.**

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# Executive Summary

## Introduction

In December 2020, Glasgow City Council, passed a motion that *“Glasgow has a rent crisis for many in the private rented sector”*. The motion resolved *“to set up a tenant-led commission to make recommendations on reforms needed to address this crisis, including action to limit rent increases in the private rented sector.”*

It was essential that a Commission was inclusive, accountable, and fair in its functions and deliberations. The Tenants Information Service (TIS), under the scope of the Engage Influence Change (EIC) project, was engaged as a partner to assist in establishing the Commission and provide ongoing development support.

## Terms of Reference

The motion identified the necessity for Glasgow to have *“a housing market with a sufficient supply of housing available for purchase and for private and social rent”*. It further highlighted an example of *“how regulation can work alongside action to increase the supply of housing available for rent to ensure that prices are affordable”*.

Based on the Council’s motion, it was agreed a Tenant-Led Commission Terms of Reference were:

- i. To investigate the nature and extent of private rented sector housing across the Glasgow City Council area, and how it functions to meet different housing needs and demand - including consideration of housing supply options, conditions and repairs, energy efficiency, and rents and affordability;
- ii. To agree an inclusive methodology for collating essential data and information regarding private rented housing;
- iii. To engage with key stakeholder groups, organisations, community groups, and the public, through a comprehensive ‘Evidence Gathering’ approach;
- iv. To establish a robust and credible evidence monitoring and evaluation framework for private rented sector housing across Glasgow which addresses issues of housing supply options, conditions and repairs, energy efficiency, and rents and affordability; and
- v. To produce a report and recommendations for reforms, including developments and improvement that address issues of housing supply options, conditions and repairs, energy efficiency, and rents and affordability, which will inform Glasgow’s Housing Strategy and influence national policy development where appropriate.

## Recommendations

The Glasgow Tenant-Led Housing Commission (Private Rented Sector) proposes the following sixteen recommendations for consideration by Glasgow City Council.

The Commission believe our recommendations address a number of fundamental concerns and challenges that will improve the quality of housing and standards of management within Glasgow's private rented sector housing.

<b>Affordable Housing</b>	<b>1.</b> Glasgow City Council to prioritise affordable social housing development across all sites through a review and reform of local planning policy and/or guidance.
<b>Landlords</b>	<b>2.</b> Glasgow City Council to utilise the landlord registration database to communicate and upskill landlords (e.g., training opportunities); whilst exploring other means to provide guidance and support to landlords not accessing the landlord advice service.
<b>Landlord Enforcement</b>	<b>3.</b> Glasgow City Council to increase resources and staffing to introduce a proactive approach to property inspections, and subsequent enforcement action, to increase the quality of PRS housing and standards of management.
	<b>4.</b> Glasgow City Council to establish a joint network of partnership organisations to maximise property inspections and means of identifying properties that fall below minimum standards (e.g., Police Scotland, Scottish Fire and Rescue Services, etc.).
<b>Tenants</b>	<b>5.</b> Glasgow City Council to establish a tenant-led forum/platform for meaningful engagement with Glasgow's private rented sector tenants.
	<b>6.</b> Glasgow City Council to work with stakeholder organisations to identify opportunities to support and upskill tenants to communicate confidently and influence the housing services they receive.
<b>Tenancy Deposits, Disputes and Evictions</b>	<b>7.</b> Glasgow City Council to develop and deliver a training programme for stakeholder agencies, focused on identifying and dealing with illegal evictions to encourage intervention and support when required.
<b>Accessibility and Adaptations</b>	<b>8.</b> Glasgow City Council to work with stakeholder organisations to assess existing PRS stock, to determine how many tenants are living in unsuitable accommodation. Thereafter, tenants should be supported, in partnership with stakeholder agencies, to access properties that meet their needs, creating more sustainable tenancies.
	<b>9.</b> Glasgow City Council to develop an intermediary register of landlords with adapted, accessible, and approved PRS properties to reduce the number of tenants in unsuitable accommodation.

<b>Housing and Welfare PRS Support Hub</b>	<b>10.</b> Glasgow City Council to recognize the increasing demand for the integral Housing and Welfare PRS Support Hub service and continue to appropriately resource this essential service.
	<b>11.</b> Glasgow City Council to expand the current scope of this service to the wider PRS sector to ensure referrals are open to everyone.
<b>Quality of Housing and Standards of Management</b>	<b>12.</b> Glasgow City Council to utilise Enhanced Enforcement Area status and powers in similar areas of high density PRS households as a means of addressing and improving poor quality housing and standards of management.
	<b>13.</b> Glasgow City Council to commit resources to the development and establishment of tenants' and residents' groups/associations within mixed tenure (e.g., tenement) housing stock, to proactively communicate and address cyclical maintenance and repairs, as well as nurturing a sense of community.
<b>Rents and Affordability</b>	<b>14.</b> Glasgow City Council to work in partnership with the Scottish Government to introduce a robust and measured approach to a points-based system of rent controls, based on property standard and/or condition, to incentivise landlords to invest in their properties, as a means of justifying rent levels. Subsequently, improving the quality of PRS housing and standards of management.
<b>Students</b>	<b>15.</b> Glasgow City Council to work in partnership with stakeholder organisations to safeguard students' welfare and ensure students are not "priced out" of education due to a lack of affordable housing options.
<b>Discrimination</b>	<b>16.</b> Glasgow City Council to work in partnership with stakeholder organisations to proactively identify and eradicate discriminatory practices across Glasgow's PRS.

## Foreword and Acknowledgements

### Welcome to the Glasgow Private Rented Sector Tenant-Led Housing Commission report.

The Commission has worked in partnership with many of Glasgow's key private rented organisations to capture lived and organisational experience, and to identify areas for improvements in Glasgow's private rented sector.

The unique and trailblazing Commission was formed in September 2021 following Glasgow City Council passing a motion that *"Glasgow has a rent crisis for many in the private rented sector"*. The motion resolved *"to set up a tenant-led commission to make recommendations on reforms needed to address this crisis, including action to limit rent increases in the private rented sector."*

We hope that the findings and recommendations within this report influence Glasgow City Council's development of the Glasgow Housing Strategy, paving the way for fundamental improvements to the quality of housing and standards of management.

The Commission would like to take this opportunity to thank Benn Rapson (Strathclyde Students' Union); Danny Pilkington (Living Rent); Dr. Jennifer Harris (UK Collaborative Centre for Housing Evidence); Joey Lawrie (Homes for Good); Marjorie Cuthbert (Glasgow Centre for Inclusive Living); Samuel Thomas (Shelter Scotland); for their commitment, resources, and input throughout the lifecycle of this project. We thank the Commission tenant volunteers for their input and experience which has been invaluable throughout.

Additionally, we would like to thank the Tenants Information Service (TIS), and in particular, Stephen Connor, for his expertise in facilitating the significant organisation of the Commission. This includes the collation of views, research, findings, and recommendations detailed within this report.

Last but by no means least, we would like to thank Matt McNulty (Glasgow City Council); Steve McGowan (Glasgow City Council); Brian Carroll (Glasgow City Council); Mike Smith (SafeDeposit Scotland); Iain Chisholm (Positive Action in Housing); Anne Halsey (Scottish Association of Landlords); Stephen McAlaney (Home Energy Scotland); Mark McArthur (Energy Savings Trust); Mike Heffron (Under One Roof Scotland); and Lisa Innes (Glasgow Centre for Inclusive Living) for their valued input and contributions.

It should be noted that throughout the lifecycle of the Commission, a number of tenant representatives were unable to sustain their commitment for the duration of the Commission's project. This was due to ongoing professional and/or personal factors. In addition, Living Rent withdrew their involvement on the Commission following submission of the report.

- **Jean Charsley and Emma McShane**  
Co-Chairs of the Tenant-Led Housing Commission

# 1. Introduction

## 1.1

In December 2020, Glasgow City Council, passed a motion stating that “*Glasgow has a rent crisis for many in the private rented sector*”. The motion resolved “*to set up a tenant-led commission to make recommendations on reforms needed to address this crisis, including action to limit rent increases in the private rented sector.*”

## 1.2

It was essential that the Commission was inclusive, accountable, and fair in its functions and deliberations. The Tenants Information Service (TIS), under the scope of the Engage Influence Change (EIC) project, was engaged as a partner to assist in establishing the Commission and provide ongoing development support. The Glasgow Tenant-Led Housing Commission was a platform for proactive and meaningful engagement between private rented sector (PRS) tenants, and supporting stakeholder organisations to:

- Have the opportunity to share experience of Glasgow’s PRS;
- Participate in discussions around what needs to happen to make recommendations for reform; and
- Produce an evidenced-based report to inform decision makers and those with the power to influence and implement change.

## 1.3

There were twelve meetings of the Commission, facilitated by TIS. The meetings explored different aspects of Glasgow’s PRS housing, and what the varying impacts are on tenants and landlords. The Commission heard from: Energy Savings Trust; Glasgow Centre for Inclusive Living, Glasgow City Council’s Housing Strategy, Private Landlord Registration Unit, Housing and Welfare Team (PRS Support Hub); Home Energy Scotland; Living Rent; Positive Action in Housing; SafeDeposit Scotland; Scottish Association of Landlords (SAL); Shelter Scotland; TIS; UK Collaborative Centre for Housing Evidence (CaCHE); and Under One Roof Scotland.

## 1.4

This report summarises evidence gathered, and outlines a collective opinion shared on behalf of the Commission. It offers recommendations for reform underpinned by key findings. This report focuses on:

- PRS housing options: stock supply profile and trends
- PRS landlord profiles and trends
- Enforcement: housing quality, standards, and compliance
- PRS tenants: options, demand, and support
- Tenancy deposits, disputes, and evictions
- Accessibility and adaptations
- Challenges and support for struggling households
- Quality of housing and standards of management
- Rents and Affordability

## 1.5

This report aims to inform Glasgow’s Housing Strategy and influence national policy development (where appropriate).

## 2. Background

### 2.1

In December 2020, Glasgow City Council passed a motion stating that “*Glasgow has a rent crisis for many in the private rented sector*”. The motion resolved “*to set up a tenant-led commission to make recommendations on reforms needed to address this crisis, including action to limit rent increases in the private rented sector.*”

### 2.2

Local authorities are required by the Housing (Scotland) Act 2001<sup>1</sup>, to prepare a local housing strategy (LHS) supported by an assessment of housing need and demand. LHS provide direction for tackling housing issues and inform future investment in housing and related services.

### 2.3

Glasgow's Housing Strategy<sup>2</sup> (GHS) is Glasgow City Council's main, five-year statutory plan for housing, which sets out strategic priorities and objectives for 2017-2022. It is evidence-based, informed by data and analysis regarding the roles, functions, and performance of local housing markets and systems.

It was developed through wide-ranging consultation and engagement with key partners and stakeholders, including community groups and representatives, and prepared in accordance with Scottish Government guidance. It sets out key themes and strategic priorities as follows:

#### Themes

- Increasing supply and improving quality of housing available to Glasgow's people
- Improving access to appropriate housing for Glasgow's people

#### Strategic Priorities

1. New build housing and area regeneration
2. Manage, maintain, and improve existing housing
3. Raise private rented sector standards
4. Tackle fuel poverty, energy inefficiency and climate change
5. Improve access to housing
6. Promote health and wellbeing

Glasgow City Council is responsible for preparing a new local housing strategy for 2023 to 2028, and **the Commission hopes its findings will inform this strategy.**

<sup>1</sup> Housing (Scotland) Act 2001 - <https://www.legislation.gov.uk/asp/2001/10/contents>

<sup>2</sup> Glasgow's Housing Strategy 2017-22 - <https://www.glasgow.gov.uk/CHttpHandler.ashx?id=4584&p=0>



## Planning a Tenant-Led Housing Commission

### 2.4

A unique and defining feature of the Commission was being tenant-led. This meant it required appropriate representation, participation, and direction from people with lived experience as private rented tenants, as well as representation from organisations with experience of engaging tenants and residents.

### The role of TIS

### 2.5

It was essential that the Commission was inclusive, accountable, and fair, in its functions and deliberations. It was agreed that the [Tenants Information Service \(TIS\)](#), under the scope of the [Engage Influence Change \(EIC\)](#) project, would facilitate the establishment of the Commission and provide ongoing development support.

The Glasgow Communities Fund<sup>3</sup> awarded funding to TIS to deliver the EIC project, which has a focus on providing opportunities for people within Glasgow, to actively participate and engage within their local communities and empower people to identify solutions that meet their needs. TIS has knowledge and skills related to housing, community development, and engagement practice. Private sector tenants are identified as a priority target group within the EIC project.

The specific roles undertaken by TIS included:

- Co-ordinating the invitation and selection process for people with lived experience as private rented sector tenants, and organisations who engage individuals with lived experience as private sector tenants, to join the Commission.
- Providing orientation, training and development to support representatives to undertake their roles on the Commission confidently.
- Providing additional advice, training, and support (as required) to enable representatives to make decisions and complete key tasks for the Commission, which included evidence gathering and scrutiny processes, as well as preparing a report with recommendations.

### 2.6

In establishing a Tenant-Led Commission there were four main areas for consideration:

- Ensure it has wide representation and robust governance
- Clear and relevant Terms of Reference (scope)
- Based on robust evidence gathering
- The report provides recommendations for improvements

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<sup>3</sup> Glasgow Communities Fund - <https://www.glasgow.gov.uk/glasgowcommunitiesfund>

## 3. Setting up the Commission

### 3.1 Representation and Governance

#### 3.1.1

The Commission required a formal structure. It was agreed that a Commission Board comprising of fifteen members be established. This would include a majority of ten members with lived experience as private rented tenants, who reside within the Glasgow local authority area, and an additional five organisations who engage individuals with lived experience as private sector tenants.

#### 3.1.2

TIS independently coordinated the invitation and selection process, based on an equalities-led approach. Specific consideration would be given for inclusion of candidates possessing a protected characteristic, as defined by the Equality Act (2010)<sup>4</sup>. Glasgow is a large and diverse area, and Landlord Registration data indicates that there is significant private rented supply across all areas of the city.

#### 3.1.3

In order to ensure appropriate balance of representation, ten tenant representatives would be made up of at least two per Sector Area (six in total), as defined by Glasgow's Community Planning Partnership<sup>5</sup>: North East; North West; and South.

#### 3.1.4

In parallel, an open invitation was published for five organisations who engage individuals with lived experience as private sector tenants. Prospective organisations would include tenant organisations; community organisations; community law centres; advice services; registered social landlords; or landlord organisations. However, is not limited to these.

#### 3.1.5

Two 'Co-Chairs' would be elected **by and from** the ten tenant representatives. The Commission would operate on a similar model to a Select Committee; taking evidence, synthesizing, scrutinising, and deliberating on what to do.

#### 3.1.6

TIS promoted the invitation process via national media outlet Glasgow Live<sup>6</sup>, and on the TIS Facebook and Twitter pages, as well as Glasgow City Council's social media feeds. The Glasgow Live special feature reached over 82,000 people and generated over 166,000 impressions<sup>7</sup>.

#### 3.1.7

TIS communicated with approximately 108 organisations to invite applications for the five seats, designated for organisations with expertise in engaging private sector tenants.

#### 3.1.8

An open invitation was also published calling for expressions of interest. Any individual expressing interest was able to opt-in to receive regular communications providing updates on the progress of the Commission and notifications of any call(s) for evidence.

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<sup>4</sup> The Equality Act (2010) - <https://www.gov.uk/guidance/equality-act-2010-guidance>

<sup>5</sup> Glasgow Community Planning Partnership - <https://www.glasgowcpp.org.uk/>

<sup>6</sup> Glasgow Live - <https://www.glasgowlive.co.uk/special-features/you-lived-private-rented-housing-20816683>

<sup>7</sup> The number of times any content from a social media page has entered a person's screen.

### 3.1.9

The Commission would receive initial training and development, provided by TIS, to support representatives to undertake their roles confidently. All Board members were advised of their responsibilities and collectively would agree upon a Code of Conduct to ensure the Commission's deliberations were inclusive, accountable, and fair **as detailed within Section 4. The Commission Board.**

## 3.2 Terms of Reference

### 3.2.1

The December 2020 Council motion also identified the necessity for Glasgow to have *“a housing market with a sufficient support of housing available for purchase and for private and social rent”*. It further highlighted an example of *“how regulation can work alongside action to increase the supply of housing available for rent to ensure that prices are affordable”*. (Glasgow City Council Neighbourhoods, Housing and Public Realm Committee: December 2020)

### 3.2.2

Based on the Council's motion, it was agreed that the Tenant-Led Commission Terms of Reference (scope) were:

- i. To investigate the nature and extent of private rented sector housing across the Glasgow City Council area, and how it functions to meet different housing needs and demand - including consideration of housing supply options, conditions and repairs, energy efficiency, and rents and affordability;
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- v. To produce a report and recommendations for reforms, including developments and improvement that address issues of housing supply options, conditions and repairs, energy efficiency, and rents and affordability, which will inform Glasgow's Housing Strategy and influence national policy development where appropriate.

## 3.3 Evidence Gathering

### 3.3.1

The scope of the Commission required a thorough evidence gathering, fact-finding, robust, and credible, combined methodology approach, involving:

- Data analysis and research
- Survey and consultation
- Targeted engagement session

### 3.3.2

The Commission agreed on an approach and set out a call for evidence schedule to invite submissions. The Commission maintained a register of all evidence submissions that would be published, subject to consents, alongside the final report.

As a key output based on the Evidence Gathering, the Commission set out a baseline assessment of the functions and performance of Glasgow's PRS Housing to be included in the final report.

A register of stakeholder contributions **is outlined within Appendix 1.**

## 3.4 Report and recommendations

### 3.4.1

The Commission agreed to publish a report detailing the Evidence Gathering process and setting out key findings and recommendations for reforms. The report would be submitted to Glasgow City Council for consideration.

The report and recommendations would inform the development of the next Glasgow Housing Strategy. The report would also be of relevance to Glasgow City Council's Poverty Leadership Panel<sup>8</sup> and the Glasgow Community Planning Partnership.

## 4. The Commission Board

### 4.1

The Glasgow Tenant-Led Housing Commission (Private Rented Sector) was formed in September 2021 to a set of agreed Terms of Reference and Code of Conduct.

### 4.2

Applications received exceeded the target representation of fifteen. TIS reviewed applications and selected candidates meeting the qualifying criteria using an equalities-lead approach. It was subsequently agreed to appoint eleven tenant representatives and six organisations who engage individuals with lived experience as private sector tenants.

### 4.3

The six organisations appointed included the Glasgow Centre for Inclusive Living (GCIL); Homes for Good; Living Rent; Shelter Scotland; Strathclyde University Union; and the UK Collaborative Centre for Housing Evidence (CaCHE).

### 4.4

The inaugural meeting of the Commission took place in early September 2021. Initial orientation training was provided, and the Commission agreed a robust Code of Conduct, as well as a framework for evidence gathering and reporting.

Meeting on a monthly basis, the Commission held twelve meetings facilitated by TIS, to engage with Glasgow's key stakeholder organisations and deliberate findings.

### 4.5

In addition to ongoing engagement with the stakeholder organisations, the Commission launched

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<sup>8</sup> Glasgow City Council Poverty Leadership Panel - <https://www.glasgow.gov.uk/article/17559/Poverty-Leadership-Panel>

online surveys, separately inviting tenants and landlords to capture a broad statistical understanding and insight of experiences within Glasgow’s private rented sector.

#### 4.6

The Covid-19 pandemic continued to present challenges to undertake traditional consultation. In-person engagement was limited. Online surveys, with structured questions, to seek views from tenants and landlords were agreed. Surveys were widely promoted online via social media channels and direct outreach to stakeholder organisations.

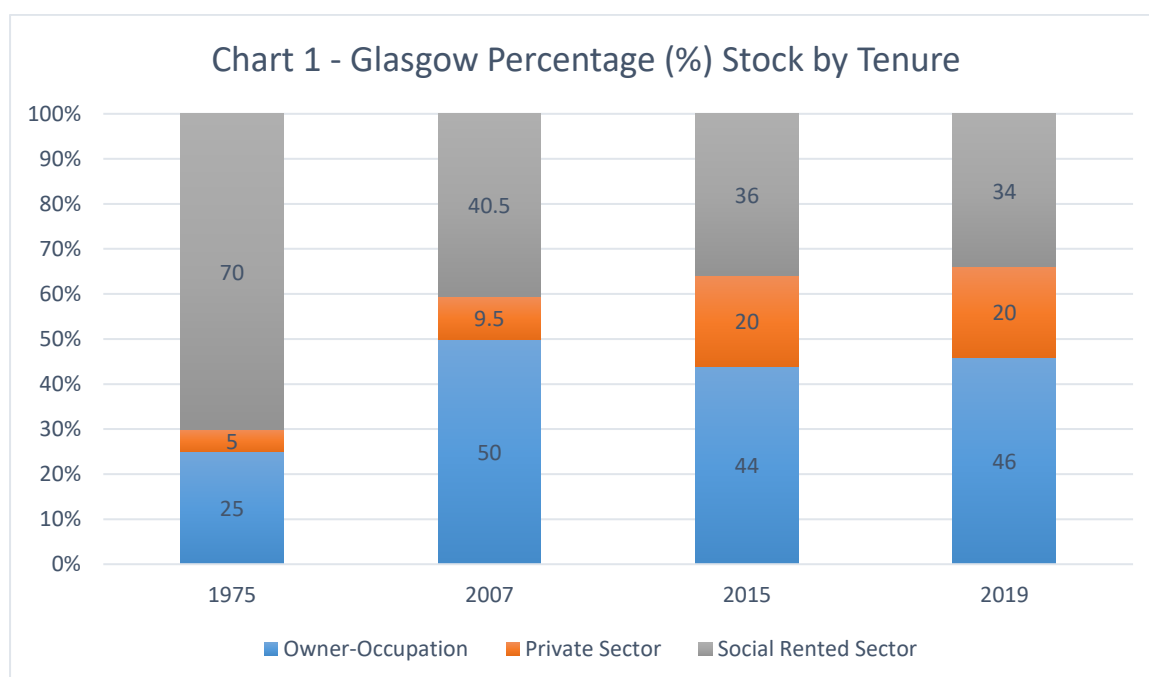
Unfortunately, the level of responses was not sufficient for statistical analysis.

## 5. Key Findings and Recommendations

### 5.1 PRS Housing Options: Stock Supply Profile and Trends

#### 5.1.1

The Scottish Government reports, Glasgow has an estimated housing stock of approximately 316,000 (including vacant private dwellings), 46% of which is owner-occupation; 34% social housing; and the remaining 20% privately rented (*Scottish Government: Housing stock by tenure, 2020*).

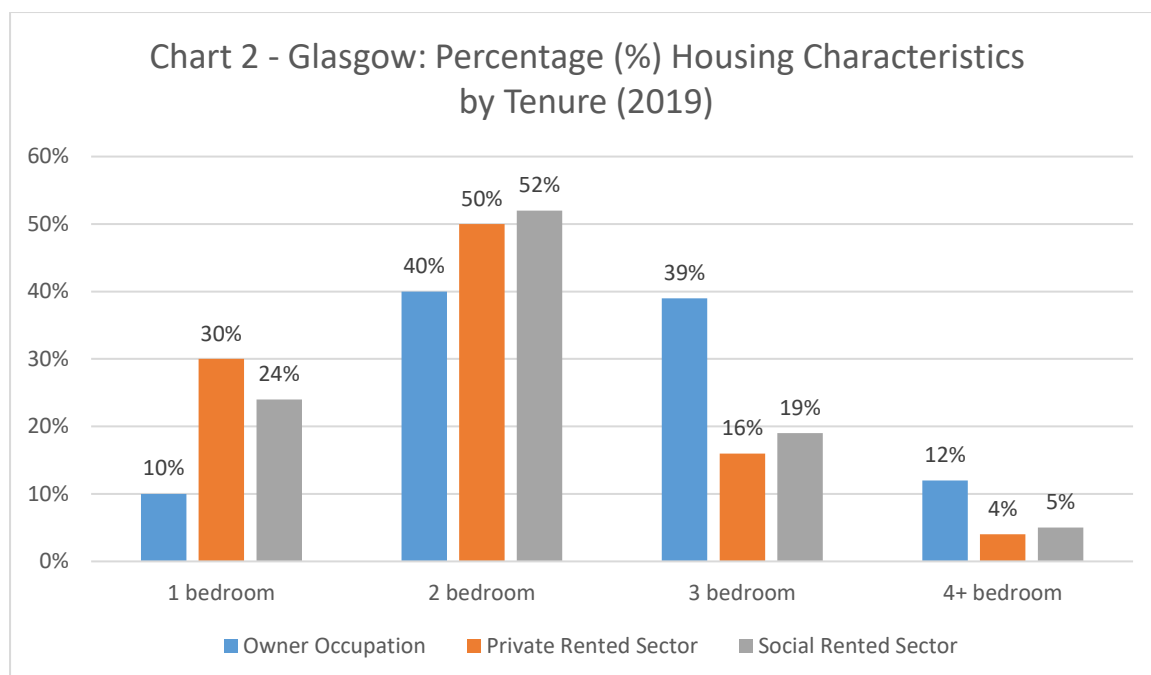


72% of Glasgow’s housing stock is flats, which is considerably higher than the Scottish comparison of 36%. Similarly, 94% of Glasgow’s PRS is flats, which again is significantly greater than the Scottish average of 63% (*Scottish Government: Scottish House Condition Survey, 2016-2018*).

42% of Glasgow’s overall housing stock was built pre-1945. Of which, 61% accounts for PRS housing stock. Approximately 67% of Glasgow’s housing stock is a 2-bedroom property or less, with 33% having 3-or-more-bedroom properties.

### 5.1.2

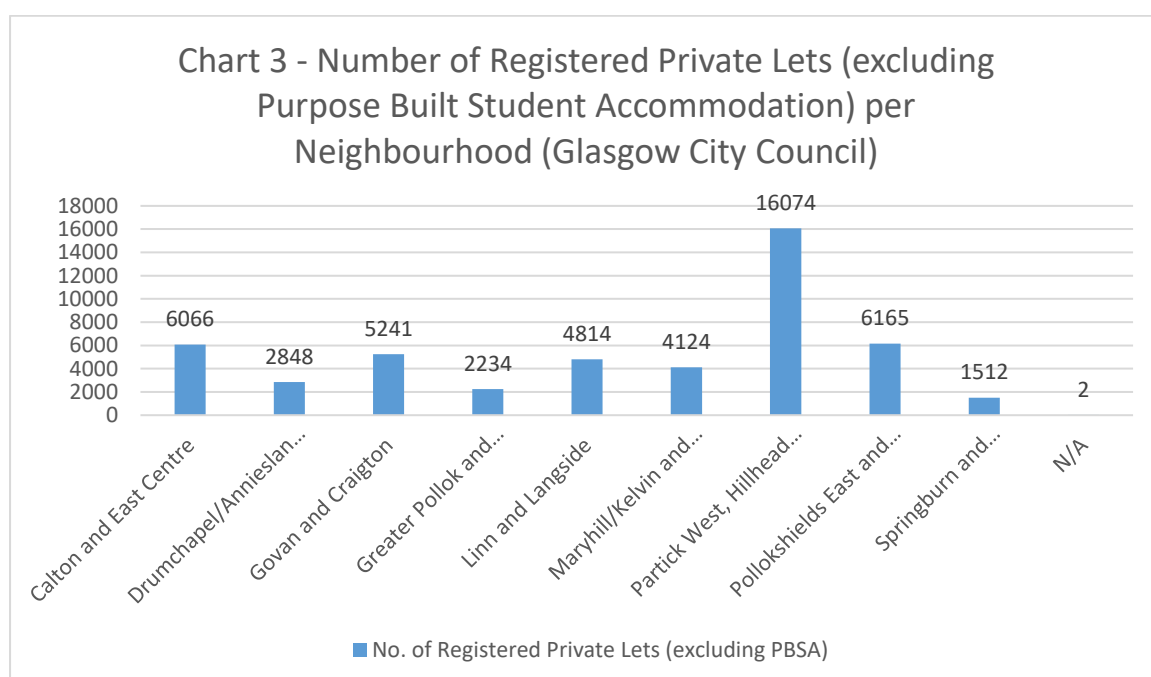
Focusing on Glasgow's housing characteristics by tenure, Scottish Government data reports 30% of PRS stock as being 1-bedroom properties; 50% are 2-bedroom; 16% are 3-bedroom; and the remaining 4% are 4-bedroom plus (*Scottish Government: Scottish Household Survey, 2019*).



Between 2001-2011, the Census highlighted a substantial growth of Glasgow's private rented sector by 124.3%. In comparison, this was considerably higher than the 85.6% growth in Scotland (*Glasgow City Council: Housing Change in Glasgow, 2016*). Between 2007 and 2015, Glasgow's PRS increased from 9.5% to 20% where it has remained in recent years.

### 5.1.3

Partick West, Hillhead, and Anderston/City has the highest number of registered private lets with 16,074 (*Glasgow City Council: Landlord Registration, 2021*).



#### 5.1.4

#### What is driving the growth of private renting in Glasgow?

Through ongoing engagement with stakeholder organisations, the Commission has noted the following drivers for the growth of Glasgow's PRS:

- Right to Buy has significantly reduced Glasgow's social housing stock and detrimentally impacted on the availability of affordable housing in Glasgow. This drives demand for alternative housing options, such as the PRS.
- An increasing population in the mid-2000s, whilst taking into consideration migration and overseas students, continues to drive demand for PRS properties.
- A lack of financial support and incentives for First-Time-Buyers to get onto the property ladder, restricts movement and natural turnover, increasing demand for the PRS.
- The ongoing increasing cost of living (e.g., rent, energy bills, travel, etc.) hinders tenants from saving financially to progress onto the property ladder. This stagnates turnover and results in reduced availability.

In addition to the above drivers, the Commission acknowledges a considerable number of tenants who choose to rent privately. However, **further research is required to explore potential increasing demand from people who prefer this option.**

### 5.2 PRS Landlords Profile and Trends

#### 5.2.1

As of November 2021, Glasgow City Council reported approximately 59,000 private rented properties (including 4,000 licensed Houses of Multiple Occupation), owned by 40,208 registered private landlords. Of which, 30,485 (75.8%) owning one single property, with 7,520 (18.7%) owning between 2 and 5 properties. The largest property portfolio owned by a registered landlord in Glasgow being 928.

92% of Glasgow's registered landlords reside in the United Kingdom, with 66% residing in Scotland, and almost 55% in Glasgow, whereas 8% reside overseas.

#### 5.2.2

Private landlords are obligated, under the "the 2004 Act", to undertake a self-certification process to register with the local authority (*Scottish Government: Antisocial Behaviour, etc. (Scotland) Act 2004*). Random sampling is periodically undertaken at the local authority's discretion; however, this is not reflected in legislation.

Glasgow City Council collates data for newly registered landlords per year; however, it does not capture the number of unregistered landlords reported to them via third parties. In Glasgow City Council's submissions to the Commission, it was noted that the reporting of possible unregistered landlords to the Council is minimal.

#### 5.2.3

Table 1 - Breakdown of Glasgow Landlord Portfolio		
No. of Properties	No. of Landlords	%age
0	1,016	2.5%
1	30,485	75.8%
2 – 5	7,520	18.7%
6 – 10	814	2.0%

11 – 25	262	0.7%
26 – 50	58	0.1%
51 – 100	25	0.1%
100+	27	0.1%
Max 928	1	0.0%
<b>TOTAL</b>	<b>40,208</b>	<b>100.00%</b>

Glasgow City Council's Neighbourhood and Regeneration Services has six Houses of Multiple Occupation (HMO) officers and eight Private Landlord Registration Unit (PLRU) officers currently managing approximately 40,208 registered landlords.

Recognising the number of Glasgow “accidental” or “amateur”<sup>9</sup> landlords, it is evident **more resources are required to proactively engage and encourage landlords to access vital support and guidance to drive up standards of management.**

#### 5.2.4

Glasgow City Council's approach to landlord engagement through the citywide Landlord Forum and regular landlord newsletters was acknowledged as good practice. However, **a lack of opportunities enabling tenants to similarly engage and influence the housing services they receive was noted.**

#### Scottish Association of Landlords

#### 5.2.5

Nationally, the Scottish Association of Landlords (SAL) provides support across Scotland to approximately 4,000 members in the face of continuous enhanced legislative requirements, and is recognised nationally, as well as by the Commission. A call for evidence was submitted to SAL, Landlord Accreditation Scotland and the Council of Letting Agents. The Commission sought to understand a breakdown of Glasgow-based membership, including the number of accredited landlords; however, this information is not available and/or shared out with SAL's membership.

#### 5.2.6

The Council reported to the Commission an approximate 40,208 registered landlords (*Glasgow City Council: Landlord Registration, 2021*).

In the absence of a breakdown of Glasgow-based membership, it proves difficult to understand the full scope of SAL's representation of Glasgow-based registered landlords.

#### 5.2.7

SAL reported, to the Commission, that approximately 36% of its membership is considering exiting the sector in the face of increasing taxation and enhanced legislative requirements (*Scottish Association of Landlords, 2022*).

The Commission is disappointed and concerned that landlords would choose to exit the market, rather than embrace legislation proposed to improve the quality of housing and standards of management for tenants. Consequently, should this happen, there is evidence to suggest an adverse impact on availability, fueling demand, as well as increasing rental costs.

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<sup>9</sup> Within this report an “accidental” or “amateur” landlord is defined by someone who finds themselves in the market not necessarily through choice, but rather through necessity. A prime example of this can be when someone inherits a property and are unable to sell it. They are often forced to rent out the property privately, and more often than not have a portfolio of one single property.



### 5.2.8

The positive and proactive work of SAL, having campaigned for increased and improved health and safety standards in the PRS, is widely recognised. Although, the Commission agree **stakeholders must play a greater role and advocate for improved living conditions and more affordable rents.**

## 5.3 Enforcement: Housing Quality, Standards and Compliance

### Landlord Enforcement

#### 5.3.1

Glasgow City Council's Licensing and Regulatory Committee<sup>10</sup> is responsible to oversee the exercise of all the Council's functions under Parts 7 and 8 of "the 2004 Act". Since 2017, this includes the registration of private landlords. The Committee is responsible for making any decisions to refuse or revoke registration.

#### 5.3.2

The Council reported to the Commission, between 2017 and 2021, seventy-one landlords were referred to the Committee for consideration. Subsequently forty-three landlords have been refused registration or had their registration revoked. Taking into consideration the relative size of Glasgow's private rented sector (i.e., 40,208 registered landlords), enforcement action to date is unlikely to reflect the true extent of poor landlord practice and unlawful behaviour in Glasgow.

The Commission echoes concerns raised by the SAL that highlight **a lack of action against poor landlord practice and unlawful behaviour continues to undermine sector confidence.**

#### 5.3.3

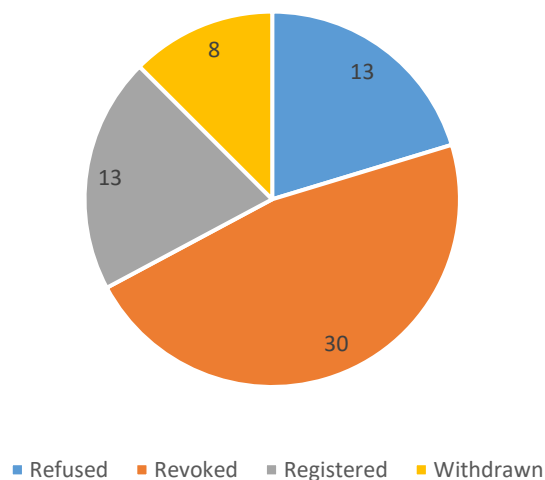
Current structures are reliant on tenants raising complaints with the quality of their housing and/or standards of management. However, there is a shared view of the Commission that tenants are often fearful of insecurity of tenure (e.g., eviction or increased rental costs) when reporting maintenance or repair issues. For this reason, closer partnership working with support agencies should be developed to actively identify sub-standard housing.

**It is fundamental for Glasgow City Council to proactively increase enforcement action** to drive out poor landlord performance and increase the quality of housing and standards of management.

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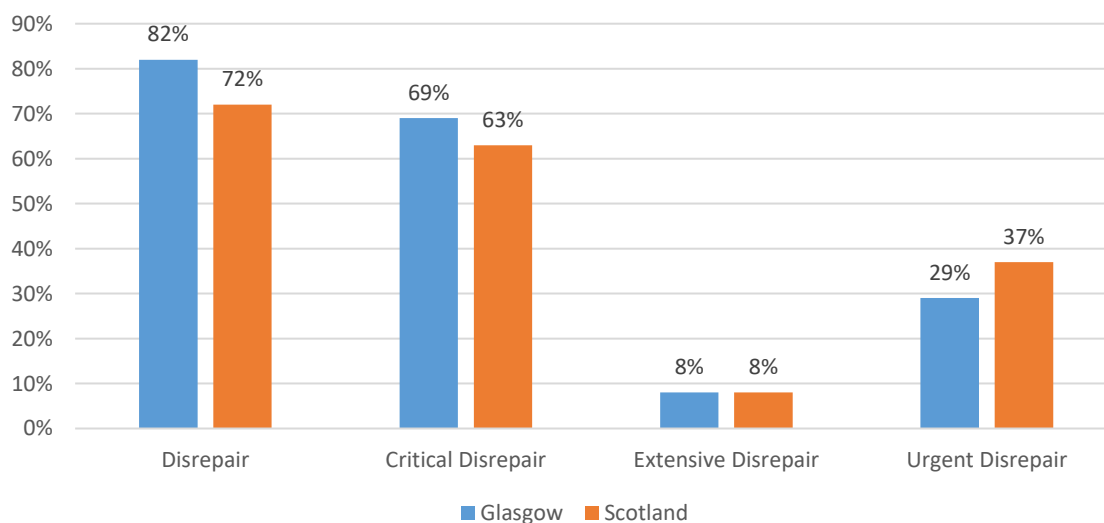
<sup>10</sup> Licensing and Regulatory Committee Terms of Reference - <https://www.glasgow.gov.uk/councillorsandcommittees/openTerms.asp?c=P62AFQNTDXNTDNT1B2S6FJ2A76QAJ5QAWSYXFQUQJ5ZTYXI7N3J5I77D50C0I72A5045YX7DL8WSC0QAFJFG7650ORFJ5353J5QAQAYXYX>

Chart 4 - Glasgow City Council: Licensing and Regulatory Committee Determination Since 2016-17 (Nov 2021)



#### 5.3.4

Chart 5 - Percentage (%) PRS Stock in Disrepair (Scottish Housing Condition Survey 2016-18)



#### Quality of Housing and Standards of Management

According to the Scottish House Condition Survey (2016-2018), **82% of Glasgow's PRS households are in disrepair to a certain degree**. This would equate to approximately 45,000 of Glasgow's PRS households.

Furthermore, **69% is estimated to be in a critical disrepair**; 8% in extensive disrepair; and 29% (16,000) in urgent disrepair.

### 5.3.5

From an organisational perspective, the Council's Private Landlord Registration Unit highlighted poor communication between landlords and tenants as often being a significant factor in PRS disrepair.

### 5.3.6

The Repairing Standard outlines that currently landlords must carry out repairs within a 'reasonable' timeframe (*Scottish Government: Housing (Scotland) Act, 2006*). However, in the absence of a clear definition of what constitutes 'reasonable', there is no agreed standard for landlords to follow. The view of the Commission is that this cultivates a lack of transparency and understanding for landlords to deal with disrepair appropriately. Consequently, CaCHE reported landlords and/or letting agents' slow uptake on repairs can have a detrimental impact on tenants and how safe and secure they feel in their homes (*UK Collaborative Centre for Housing Evidence, 2021*).

Shelter Scotland reported examples, to the Commission, where tenants are at times forced to choose riskier courses of action, such as withholding rent. However, this can result in eviction. Rent can only be legitimately withheld where the landlord has been issued a rent penalty notice by the local authority.

### 5.3.7

Under Common Law, tenants are entitled to seek compensation where landlords fail to meet their repairing obligations, and they can demonstrate loss or injury. However, this requires tenants to seek legal assistance with a duty to meet a threshold for evidence, both of which can be challenging (*Shelter Scotland: Glasgow Hub, 2022*).

Tenants' rights to repair are relatively clear on paper, however in reality are difficult to apply. As previously explained, applying to the FTT can be a long process and submitting applications can be complex and time consuming. Typically, applications can take several months to come to hearing and it can be an intimidating and overwhelming process for tenants with no support (i.e. legal representation). **Tenants must be supported to access appropriate representation to enable them to challenge confidently and competently.**

### 5.3.8

The Commission recognises local authorities are not the regulatory body for private property disrepair issues, and support Glasgow City Council to engage landlords and tenants where concerns are raised with property standards and/or conditions.

However, Glasgow City Council's Neighbourhood and Regeneration Services must be appropriately resourced and staffed **to proactively conduct routine inspections of Glasgow's PRS housing stock as a way of identifying property disrepair.**

Taking into consideration recent successful approaches to addressing poor quality housing and standards of management in the Govanhill Enhanced Enforcement Area<sup>11</sup>; the Commission agree **consideration should be given to Enhanced Enforcement Area status and powers in similar areas of high density PRS households.** Additional consideration should also be given to expand the scope of the existing Housing and Welfare PRS Support Hub (outlined in Section 5.7)

## Common Repairs

### 5.3.9

It is understood, with 94% of Glasgow's PRS households being flats (*Scottish House Condition Survey,*

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<sup>11</sup> Govanhill Enhanced Enforcement Area - <https://glasgow.gov.uk/index.aspx?articleid=21862>

2016-2018), that outstanding common repairs will account for properties reportedly in disrepair. Mixed tenure housing presents challenges in coordinating common repairs in multi-story blocks (e.g., tenements, high rise, 4-in-block, etc.).

### 5.3.10

Right to Buy significantly increased mixed tenure in tenement housing. Under One Roof Scotland highlighted where buyers purchasing former council homes, they were not provided sufficient guidance or support to understand their legal responsibility towards common repairs and maintenance. As a consequence, a significant number of Scotland's tenement housing stock is in disrepair (*Under One Roof Scotland, 2022*).

SAL reports that landlords often encounter challenges in undertaking common repairs in the absence of a property manager/factor or an owners' association, to proactively discuss and agree approaches to cyclical maintenance and common repairs (*Scottish Association of Landlords, 2022*).

### 5.3.11

Inadvertently, tenants are negatively impacted where owners (e.g., landlords) cannot agree to undertake necessary common repairs. However, it is important they are considered and engaged in the process irrespective of ownership. **There is increasing demand for support and guidance for landlords and tenants alike to address repairs and maintenance.**

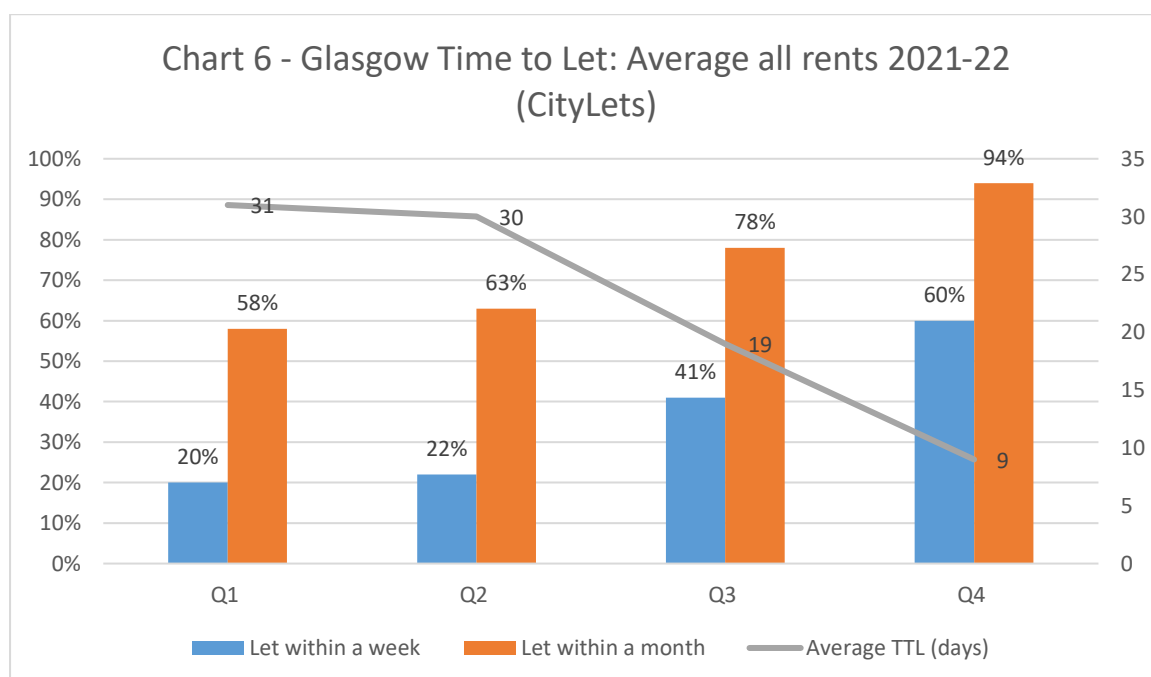
The Commission welcomes Under One Roof's proposals to explore how this could be developed.

## 5.4 PRS Tenants: Options, Demand and Support

### Accessing Glasgow's PRS

#### 5.4.1

CityLets data illustrates Glasgow's average Time to Let (TtL) significantly reduced from 31 days (Q1 – April-June 2021) to 9 days (Q4 – Jan-Mar 2022). 94% of new lets were let within a month, 60% of which were let within one week (*City Lets: Quarterly Reports, 2022*). This gives an indication of the level of demand and competition for private rented properties in the City (see Chart 6).



## Students

### 5.4.2

The Commission recognised challenges impacting students residing within Purpose Built Student Accommodation (PBSA) and Glasgow's wider private rented sector.

### 5.4.3

Strathclyde Students Union offered research, to the Commission, undertaken by the National Union of Students, citing concerns as universities move away from developing their own accommodation provision. Universities have become more reliant on private contractors developing and managing PBSA at largely unaffordable rental costs and service charges for students.

The average annual rent for PBSA in Scotland reached £6,853 in 2021-22, **a 34% increase on pre-Covid levels**. The average Scottish students rent (£6,853) accounts for 88% of the maximum student loan available (£7,750), which leaves students with £22.42 per week. However, for students in receipt of the minimum student loan, the average Scottish student rent accounts for 144% of their available loan (*National Union of Students, Unipol, 2021*).

### 5.4.4

Acknowledging the significant number of overseas students who come to Glasgow to study each year; many students are unable to sustain PBSA and are compelled to consider Glasgow's wider PRS for housing.

Consequently, Strathclyde Students Union reported to the Commission students are often forced to compromise on location and/or standard or quality of housing available to them financially, with many additionally experiencing discrimination (e.g., "*no students*") (*Strathclyde Students Union, 2022*).

### 5.4.5

Further research is required to understand **what considerations are undertaken by universities and colleges when recruiting students and factoring additional pressures on Glasgow's wider housing market**.

Taking into consideration the overall lack of supply, the shortage of affordable housing options, and stagnating turnover in Glasgow's PRS, this increases pressure and demand on an already limited housing market.

**The Commission echo concerns raised by Strathclyde Students Union. There is a requirement for partnership working and shared responsibility for universities, colleges, and Glasgow City Council to work together to safeguard students' welfare. In addition, to ensure students are not priced out of education due to a lack of affordable housing options.**

## Discrimination

### 5.4.6

Ongoing challenges with discrimination within Glasgow's PRS were raised by Shelter Scotland, to the Commission, and corroborated by Living Rent and Strathclyde Students Union (e.g. "*no students or tenants in receipt of benefits*"). '*No DSS*' policies were ruled to be unlawful discrimination, and yet many landlords and letting agencies continue to employ this policy. There continues to be substantial barriers for individuals and/or families on low incomes trying to access Glasgow's PRS (*Shelter Scotland: Glasgow Hub, 2022*).

#### 5.4.7

SAL highlighted challenges with landlord insurance providers stipulating ‘no students’ within their policies, which fuels discrimination. To mitigate this, SAL encourages and supports members to consider alternative options, and drive out discriminatory practice and behaviour (*Scottish Association of Landlords, 2022*).

#### 5.4.8

In addition, Positive Action in Housing, reported many Glasgow service users being subject to malicious and exploitative behavior from private landlords, where rooms are often sublet without their consent to allow landlords to maximise rental income.

Specific examples of the Govanhill Roma community encountering prejudice from the wider community were shared with the Commission, and it was acknowledged **behavioral traits are often the circumstances of living in poverty and in properties in a state of disrepair**. In particular, overcrowding and poor property conditions are a continuous challenge for the Roma community residing in Govanhill’s PRS (*Positive Action in Housing, 2022*).

### 5.5 Tenancy Deposits, Disputes and Evictions

#### 5.5.1

It is common practice for landlords to charge for a security deposit. SafeDeposit Scotland reported, to the Commission, that the maximum amount that can be charged as a deposit cannot be more than two months' rent, and it must be protected in a statutory tenancy deposit scheme.

Landlords must lodge the deposit with a tenancy deposit scheme within 30 working days of the tenancy starting. There are three tenancy deposit scheme providers in Scotland, Letting Protections Service Scotland; SafeDeposit Scotland; and My Deposits Scotland (*SafeDeposit Scotland, 2022*).

#### 5.5.2

Shelter Scotland highlighted concerns where **tenancy deposits can be a significant barrier for individuals and/or families on low incomes**. Tenancy deposits are not covered by housing benefit, although there are support options for tenancy deposits available, however **existing mechanisms are inadequate** (*Shelter Scotland: Glasgow Hub, 2022*). These are:

- **Glasgow Key Fund** - a scheme operated by Y People providing a ‘rent deposit guarantee’ to PRS landlords in lieu of payment. However, the scheme is **only accessible via referral** from Glasgow City Council homelessness team and is **limited to landlords already signed up to scheme**.
- **Discretionary Housing Payment** - a fund operated by local authorities to top up housing related benefits, which can also be used for deposits. **A tenancy agreement is usually required, which can create barriers** for tenants.
- **Budgeting advance from DWP** - **many individuals and/or families are ineligible** where they are already paying back an outstanding advance, and it can be **difficult to obtain the full amount required**.

#### 5.5.3

The Commission issued a call for evidence from Scotland’s three (3) tenancy deposit scheme providers and were grateful for SafeDeposit Scotland’s participation and valuable input.

#### 5.5.4

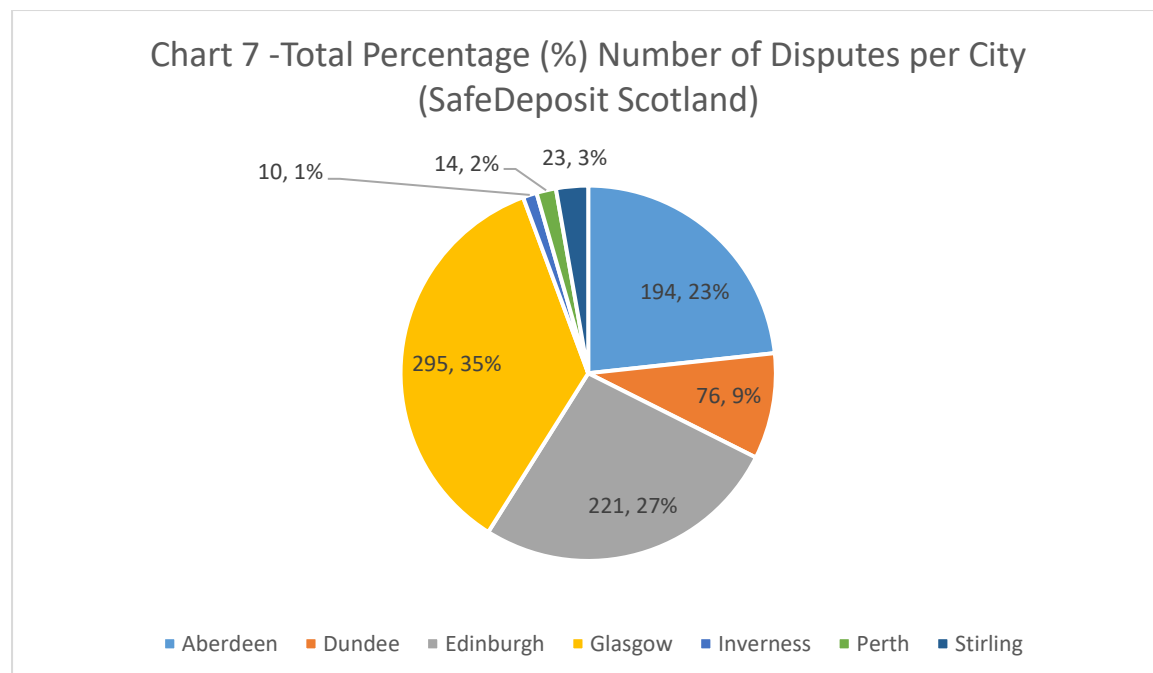
Nationally, SafeDeposit Scotland hold 152,344 deposits with a value of £120,836,576.81. Between

2020 and 2021 it reported a 10% increase in the number of deposits held, and a 16% in the value of deposits held.

The average deposit value increased from £756.19 (pre-pandemic) to £791.58 (mid/post-pandemic), which reflects the indicative average PRS rental increase over the same period.

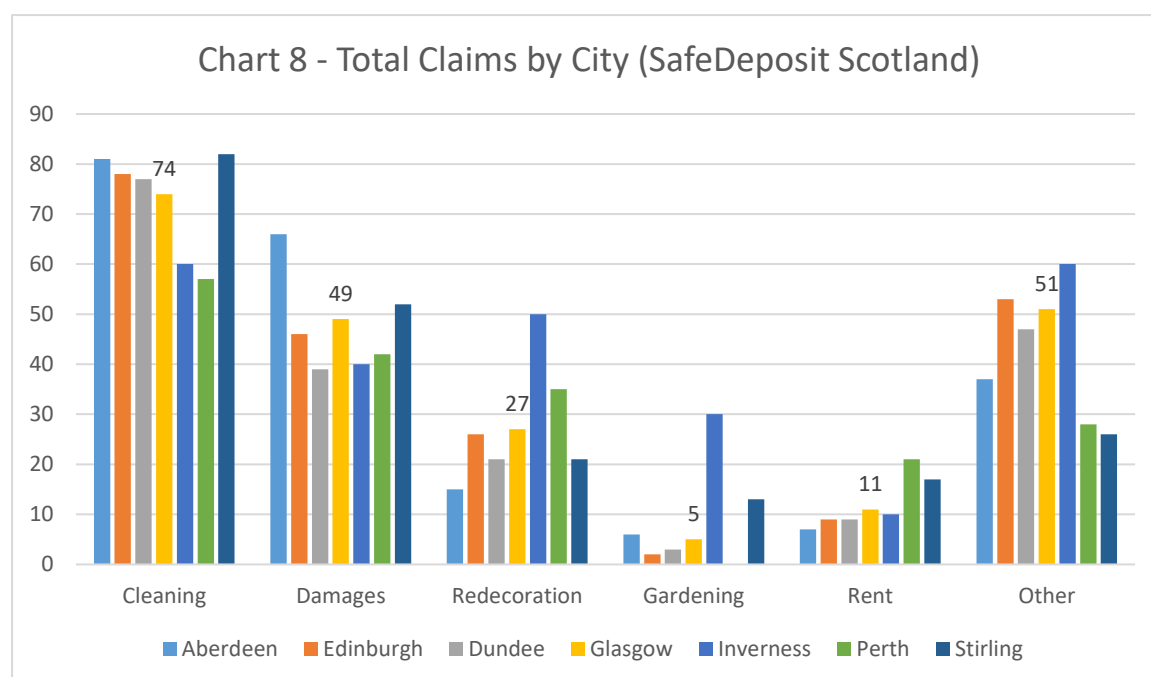
SafeDeposit Scotland reported, to the Commission, 12,961 total deposits held for Glasgow private lets in 2021. A 2.25% increase on 2020 whilst in the midst of the pandemic.

### 5.5.5



Glasgow accounts for 35% of SafeDeposit Scotland's total number of disputes over the same period, with an average disputed amount of £394 (see Chart 7). Data suggests cleaning being the primary reason for disputes between tenants and their landlords in Glasgow, although this is reflected nationally (see Chart 8).

### 5.5.6



SafeDeposit Scotland reported that in terms of disputes, overall, 17% of claims are upheld in favour of tenants, 19% in favour of landlords and the remaining 64% are agreed to be split. 91% of rent arrears claims are upheld in favour of the landlord.

### 5.5.7

Access to anecdotal data to explore disputes per demographics is not currently available, however **could potentially highlight specific groups in need of support, as well as discrimination against a specific demographic.**

### 5.5.8

Reports of tenants and landlords seeking support/redress through the First-Tier Tribunal (FTT) often experiencing considerable delays in the process were corroborated throughout by Shelter Scotland, SafeDeposit Scotland and SAL.

### 5.5.9

The Commission acknowledge self-resolution<sup>12</sup> as good practice. Positively this reduces the requirement for tenants and landlords to seek arbitration through the FTT. SafeDeposit Scotland highlighted a tendency for tenants to be more open to exploring self-resolution when compared to landlords and/or letting agents.

**The Commission support mandatory self-resolution or mediation in deposit disputes, prior to arbitration at the FTT.** This will nurture communication and engagement, and potentially sustain tenancies.

<sup>12</sup> Self-resolution enables tenants and landlords to mediate through impartial communication channels to explore satisfactory outcomes.



## Evictions

### 5.5.10

SafeDeposit Scotland reported rent arrears as the most common ground for eviction for their cases, to the Commission. The Covid-19 pandemic has led to a significant increase in rent arrears across all tenures, and as of November 2021 it was estimated to be in the region of £126million (*Shelter Scotland: Glasgow Hub, 2022*).

### 5.5.11

Although when the Scottish Government launched the Tenant Grant Fund<sup>13</sup>, to mitigate rent arrears for social and private tenants, only £10million was made available.

### 5.5.12

The end of 'no-fault' evictions has meant that landlords are only permitted to evict tenants where there are specific grounds for doing so. Although this protection does not apply to pre-existing short assured (i.e., fixed term) tenancies, most of Glasgow's PRS tenants are assumed to be on a Private Residential Tenancy (PRT).

In essence, tenants can be evicted where the landlord demonstrates specific grounds for doing so (e.g., the landlord wants to sell the property, or wants to move a relative into the property). The evidence threshold required for landlords to demonstrate a requirement for eviction is low, and open to exploitation. The Commission discussed recent examples where opportunistic landlords have evicted tenants to exploit financial gains through short-term holiday let opportunities (e.g., AirBnB). Notable examples during the recent global COP26 event, held in Glasgow.

### 5.5.13

Shelter Scotland reported to the Commission where landlords are obligated to obtain an order from the FTT prior to evicting a tenant. It is a criminal offence for landlords to evict a tenant without following the required procedure. However, **illegal evictions continue to be a challenge**. Although there have been improvements, examples highlighted police officers intentionally avoiding intervention, suggesting illegal evictions as being a civil matter (*Shelter Scotland: Glasgow Hub, 2022*). **The Commission encourage training requirements for PRS stakeholders on what constitutes an illegal eviction as a means of raising awareness**. Glasgow City Council should consider Safer Renting (London)<sup>14</sup> for good practice.

## 5.6 Accessibility and Adaptations

### 5.6.1

The Commission considered evidence in relation to the accessibility and suitability of housing within the private rented sector and what resources and assistance are available to support people to live independently within the sector.

### 5.6.2

In 2018, Horizon Housing Association, in partnership with the Chartered Institute of Housing Scotland, reported over 17,200 wheelchair users in unsuitable accommodation in Scotland. This is **set to increase by 80% by 2024** (*Horizon Housing Association, 2018*).

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<sup>13</sup> Scottish Government Tenant Grant Fund - <https://www.gov.scot/publications/coronavirus-covid-19-tenant-grant-fund-guidance-for-local-authorities/>

<sup>14</sup> Cambridge House: Safer Renting - <https://ch1889.org/safer-renting-blog/oavbhd14cg5olc049oi9zimj2v4pb2>

Table 2: Scotland - Total Housing Supply Completions 2008/09 – 2015/16				
Year	Units purpose built for wheelchair users	Total new build completions	Private sector new build completions	Purpose Built Wheelchair Units as a %age of total new build completions
2008-09	174	21,022	16,109	0.83%
2009-10	142	17,122	11,133	0.83%
2010-11	230	16,427	10,702	1.40%
2011-12	235	15,999	10,109	1.47%
2012-13	150	14,096	9,862	1.06%
2013-14	154	14,971	10,920	1.03%
2014-15	218	16,577	12,356	1.32%
2015-16	124	16,780	13,322	0.74%
<b>TOTAL</b>	<b>1,427</b>	<b>132,994</b>	<b>94,513</b>	<b>1.07%</b>

### 5.6.3

Glasgow's Strategic Housing Investment Plan<sup>15</sup> states, "All new build developments of 20 units and over must ensure that 10% of the units are to wheelchair readily adaptable standard. The Council works closely with the Health and Social Care Partnership<sup>16</sup> to identify Social Care Housing Investment Priorities. This includes ensuring that new housing supply contributes effectively towards enabling people to live independently, as well as addressing homelessness and supporting the transition towards rapid rehousing"

### 5.6.4

The Glasgow City Partnership Joint Protocol for Housing Solutions and Adaptations<sup>17</sup> was developed by Housing, and Health, & Social Care Partners (HSCP) within the city to support the delivery of a person-centred, equitable, tenure-neutral approach, to the provision of housing-based solutions, including adaptations.

The Protocol reflects a range of recommendations including early intervention; assessing rehousing opportunities; improved planning and delivery of barrier-free housing; joint governance arrangements; development of a 'tenure neutral' approach; addressing barriers to accessing and implementing adaptations; and removing the need for occupational therapists to provide an assessment for standard adaptations in RSL properties.

### 5.6.5

Glasgow has also established a Housing Solutions Protocol Group. It consists of partners including Housing and Health and Social Care and monitors the implementation of the Joint Protocol for Housing Solutions and Adaptations.

<sup>15</sup> Glasgow City Council Strategic Housing Investment Plan 2022/23 – 2026/27 - <https://www.glasgow.gov.uk/CHttpHandler.ashx?id=44876&p=0>

<sup>16</sup> Glasgow City Health and Social Care Partnership - <https://glasgowcity.hscp.scot/>

<sup>17</sup> The Glasgow City Partnership Joint Protocol for Housing Solutions and Adaptations - <https://tinyurl.com/5dp7ukwz>

During the development of Glasgow's Housing Contribution Statement<sup>18</sup>, Registered Social Landlords and Health and Social Care Services, highlighted the significant importance to continue to provide adaptations and meet future household needs.

#### 5.6.6

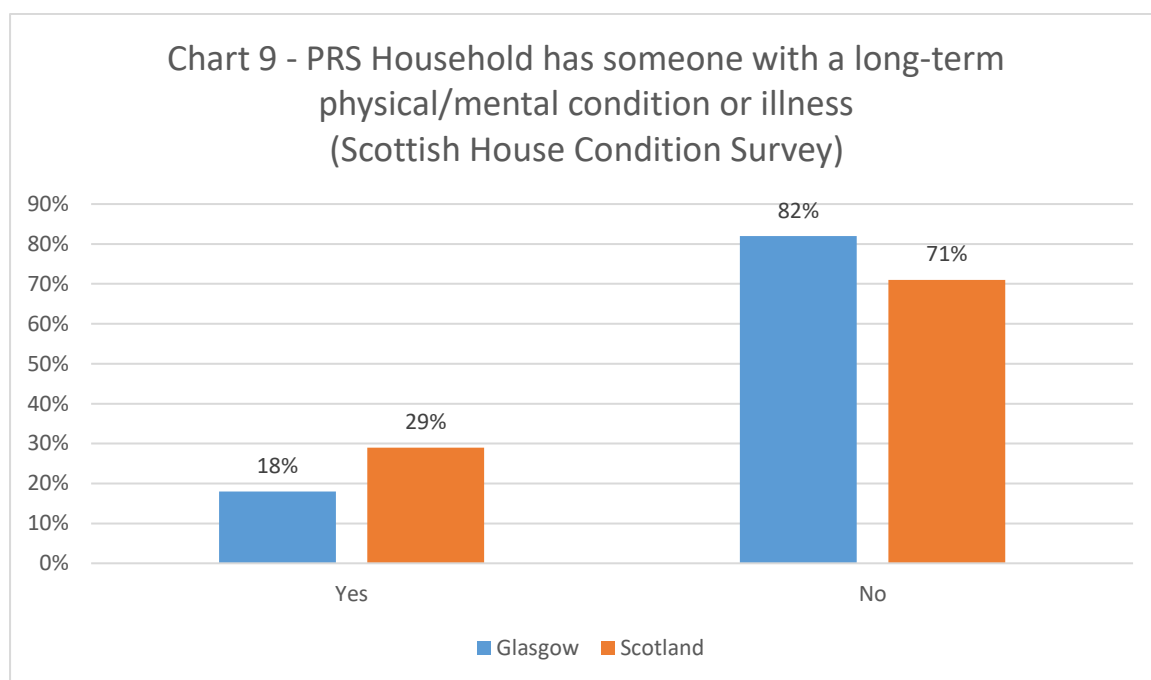
**It is important that a tenure neutral approach is delivered to ensure that people living in all tenures receive similar access to support, adaptations, and associated equipment.**

The number of people aged 65 and above is projected to increase by approximately 19,000 (22%) from 2021 to 2031. Funding adaptations remains a key housing, health and social care investment priority for Glasgow City Council going forward.

#### Glasgow Centre for Inclusive Living

#### 5.6.7

Glasgow Centre for Inclusive Living (GCIL) reported a corresponding increase in demand for support from PRS tenants (25% of cases) alongside Glasgow's growth (*Glasgow Centre for Inclusive Living, 2022*). In the absence of reliable local authority-based data, **it remains unclear how many of Glasgow's private rented tenants are in unsuitable accommodation**. Although the Scottish House Condition Survey 2019, indicates that 18% of Glasgow's PRS households have someone living with a long-term physical and/or mental health condition. This figure is assumed to be greater today.



#### 5.6.8

Glasgow City Council's combined budget for adaptations, including resources via the Affordable Housing Supply Programme (AHSP) for social rented homes, and the Private Sector Housing Grant (PSHG) for private homes, is approx. £5.25million per year. Of which, £2million is allocated via the PSHG, which funds approximately 500 adaptations per year. However, it is estimated that **less than**

<sup>18</sup> Glasgow's Housing Contribution Statement - <https://tinyurl.com/2p85xvwf>

**2% of adaptations are to private rented homes** (*estimate provided by Glasgow City Council Housing and Regeneration Services*).

### 5.6.9

In GCIL's experience, private landlords are generally unaware of financial support unless they engage with supporting agencies. Landlords are often hesitant and can be unwilling to adapt their properties citing concerns with permanent fixtures and having to potentially reinstate the property should the tenant vacate. As such, circumstantial reports suggest rent increases often follow adaptations.

According to GCIL, funding and assessment are a continuous barrier to adaptations. Tenants can wait 12 months for an occupational therapist to assess and approve adaptations. Through this time, landlords often disengage and withdraw support. In other cases, some landlords are reluctant to approve grab-rails/handles to support tenants to continue to live independently within their rented homes.

GCIL reported challenges in gaining shared ownership agreement in mixed tenure blocks for accessible adaptations (i.e., ramps), with concerns they detract from the exterior appearance of the property.

### 5.6.10

Taking into consideration 94% of Glasgow's private rented housing stock being flats (*Scottish House Condition Survey, 2016-2018*), and factoring the overall age of housing stock; **the Commission emphasised the need to conduct an assessment of Glasgow's PRS, as a method of identifying tenants in unsuitable accommodation.** Thereafter, tenants should be supported to access properties that meet their needs, creating more sustainable tenancies.

### 5.6.11

GCIL highlighted the holistic support service it receives from Glasgow City Council's Housing and Welfare Team (the PRS Hub), and underlined the importance of this service to those who are most vulnerable in Glasgow's communities.

#### **Case Study 1 - Glasgow Centre for Inclusive Living: Accessible Housing**

A client in their 40's was discharged from hospital and thereafter referred to Glasgow Centre for Inclusive Living (GCIL) by the Occupational Therapist.

The client is a fulltime wheelchair user living in a private rented property on the second floor of a traditional Glasgow tenement and is immediately requiring an accessible home.

GCIL work in partnership with Glasgow and Lanarkshire based housing association partners. They were approached by a housing association seeking nominations for a fully wheelchair accessible and adapted two-bedroom bungalow.

Following consideration from the housing association, the client was offered the property and subsequently appropriately housed in a fully accessible home to meet their needs.

The client contacted GCIL thereafter to thank them for their guidance and support.

## 5.7 Challenges and support for struggling households

### 5.7.1

The Commission invited evidence from Glasgow City Council's Housing and Welfare Team (the PRS Hub) on its role and functions, as well as the people it supports. The Commission considered the potential greater role it could play, if appropriately funded and expanded.

### 5.7.2

The PRS Hub provides vital support to vulnerable low-income families within Glasgow's PRS. It aims *"To combine financial inclusion, property and access to support services, into a single, integrated team, using an effective case management approach, that achieves sustainable housing outcomes for vulnerable people and families living in Glasgow's private rented sector that are identified by partners as at risk of homeless."* (Glasgow City Council Housing and Welfare Team, 2022).

### 5.7.3

The PRS Hub has four service objectives; prevention of homelessness (housing options); improved financial position (tackling poverty); positive health and wellbeing (personal needs); and improved safety and quality of home. It works with approximately thirty supporting partner agencies who refer individuals and/or families for support.

### 5.7.4

As of February 2022 the Council reported to the Commission, the PRS Hub had supported 970 households since inception in 2017 and had a live caseload supporting over 100 PRS tenant households. It has a success rate of 87% homelessness prevention, and additionally 84% in tenancy sustainment and is estimated to have contributed to savings over £14million in emergency accommodation costs.

Of the overall 970 household cases, 400 of which required intervention and action to ensure the property was brought up to the Repairing Standard with direct support and guidance from the property officer. **This sample suggests 41.2% of PRS housing failing the Repairing Standard.**

### 5.7.5

Over 100 families were referred for statutory social care support.

### 5.7.6

Demand for support from the service increased following the launch of the Tenant Grant Fund to support households at risk of becoming homeless due to increasing rent arrears during the pandemic.

### 5.7.7

Glasgow City Council acknowledged the unique and innovative model as being widely praised and recognised as good practice among local authorities. The Commission emphasised the clear success of the PRS Hub, and the fundamental role it plays in supporting vulnerable households across Glasgow's PRS. **The Commission feels it is important the holistic service continues to be funded.**

### 5.7.8

It was considered, the potential greater role it could play in supporting Glasgow's wider PRS overall (including students), if its scope was expanded with appropriate resources. Alternatively, if Glasgow City Council were to proactively "spot-check" PRS properties as a means of identifying sub-standard housing and poor standards of management, it would potentially mitigate demand for the PRS Hub.

### 5.7.9

The following case studies are excellent examples of the essential support the service provides to Glasgow's most vulnerable PRS households.

#### **Case Study 2 – Housing and Welfare Team: LHA rates and Benefit Cap**

Financial Services referred a lone parent family affected by the benefit cap having a shortfall of £189.85 per week, placing them at risk of homelessness. The rent charge was £895 every four weeks.

Before this tenancy, the family lived in a 2-bedroom RSL tenancy in the North East of the city. Tenant advised that she left this property due to severe overcrowding. She is a lone parent with five children under the age of ten. She found this PRS tenancy which was nearer to her family supports.

Income is low as the family is affected by the 2-child limit as well as the benefit cap (claiming income support, child tax credit and child benefit). At the initial contact, the family were found to be in severe hardship and struggling to manage, financially dependent on wider family to help with food and other living costs, including fuel. There was considerable fuel debt, and the tenant was worried that she was unable to meet her next rent payment.

The PRS Hub supported the tenant to apply for DHP which resulted in an award to cover the full shortfall and for 12 months, removing any imminent risk of homelessness. This allowed us time to support the family to consider other housing options and look at other ways to increase income.

Waiting list applications made to local RSL's for 5/6 apartments, however there is limited supply and chances of the family being rehoused are very low. The Welfare Rights Officer assisted the tenant to access employability services as working part time (up to 16 hours) and claiming Universal Credit (UC) could potentially increase income by approximately £340 per week. The tenant was keen to look at work options.

However, the tenant contacted the PRS Hub to say they had received a letter from the letting agent, as follows: *"We have recently reviewed the rent for your property with the landlord and found that the local housing allowances have increased. As of 25th September 2020, your rent will be increased to £1285 every four weeks. This letter should be forwarded to Glasgow Private Benefits so that they can adjust your claim..."*

### 5.7.10

Case Study 2 is an example of the impact of the widening gap between LHA rates and Glasgow's increasing rents, whilst factoring in the impact of the benefit cap. It also demonstrates landlords increasing rents in correspondence with LHA rates.

#### **Case Study 3 – Housing and Welfare Team: Rent Arrears and Disrepair**

A lone parent with 4 children was referred by two partners: Social Work who had eviction concerns because of rent arrears and the Health Visitor who noted the family vulnerability. She works part time, 16 hours per week, and is struggling financially.

The tenant was trying to make payments, but the property was sold and the new landlord was threatening eviction due to alleged arrears of £5,000 (*during the sale transition period, housing benefit ceased resulting in the rent arrears balance increasing considerably*).

The new landlord was refusing to carry out essential repairs whilst undertaking eviction action. There are holes in walls and in kitchen ceiling and the doors throughout the house do not close properly. The property also had rats. Though a referral had been made to environmental health, the landlord had yet to block access points.

The home was cold. The tenant had a pre-payment meter and fuel costs were high. The tenant was worried about Christmas and providing for children. She was considering taking out a loan.

PRS Hub engaged Financial Services and found information required from new landlord for benefits claim to be progressed. They engaged landlord (who lives abroad) to get info required for claim to be assessed. The landlord was depending on a family member to resolve and unaware of the situation. This resulted in a successful claim and backdated payment of £6k that cleared arrears. There is a new payment arrangement in place and landlord has ceased eviction action.

Through engagement, the landlord recognised the tenant's vulnerability and wanted to help sustain her tenancy. The essential repairs completed, and he renewed the kitchen and flooring throughout the house. Rats are no longer an issue as all access areas have now been blocked.

The PRS Hub referred the tenant to GHEAT who are supporting to reduce her fuel costs and provide fuel/energy advice. Through partnership with a local charity, able to get help with toys and gifts for children and this avoided further debt.

## 5.8 Rents and Affordability

### Rents

#### 5.8.1

Currently no comprehensive central source for Glasgow's PRS rental data exists. The Scottish Government publishes Broad Rental Market Area<sup>19</sup> analysis (BRMA), where data is generally derived from. Additional consideration is given to CityLets quarterly property rental reports.

#### 5.8.2

Local Housing Allowance (LHA) rates<sup>20</sup> are used to calculate Housing Benefit for tenants renting from private landlords. LHA rates relate to the area in which tenants make their claim. These areas are called broad rental market areas. BRMA is where a person could reasonably be expected to live taking into account access to facilities and services.

#### 5.8.3

LHA rates are based on private market rents being paid in the BRMA which can differ from advertised rents. Whereas CityLets rental data is based on **advertised new lets** and does not capture

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<sup>19</sup> Broad Rental Market Areas - <https://www.gov.uk/government/publications/understanding-local-housing-allowances-rates-broad-rental-market-areas>

<sup>20</sup> Local Housing Allowance - <https://www.gov.scot/publications/local-housing-allowance-rates-2021-2022/>

existing lets or corroborate where a landlord and/or letting agent has achieved the advertised rent reported.

#### 5.8.4

Although data indicates a levelling in the number of private lets in recent years, there has been a considerable increase in rent levels, which is reflected within BRMA and CityLets rental data for Glasgow.

#### 5.8.5

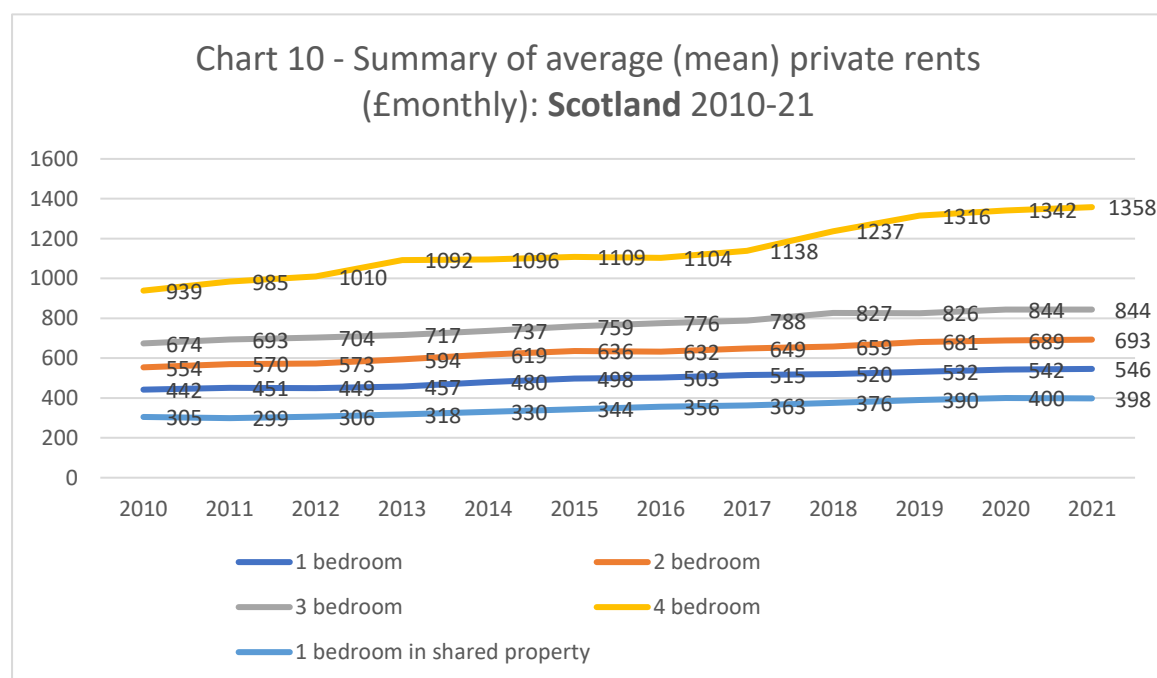
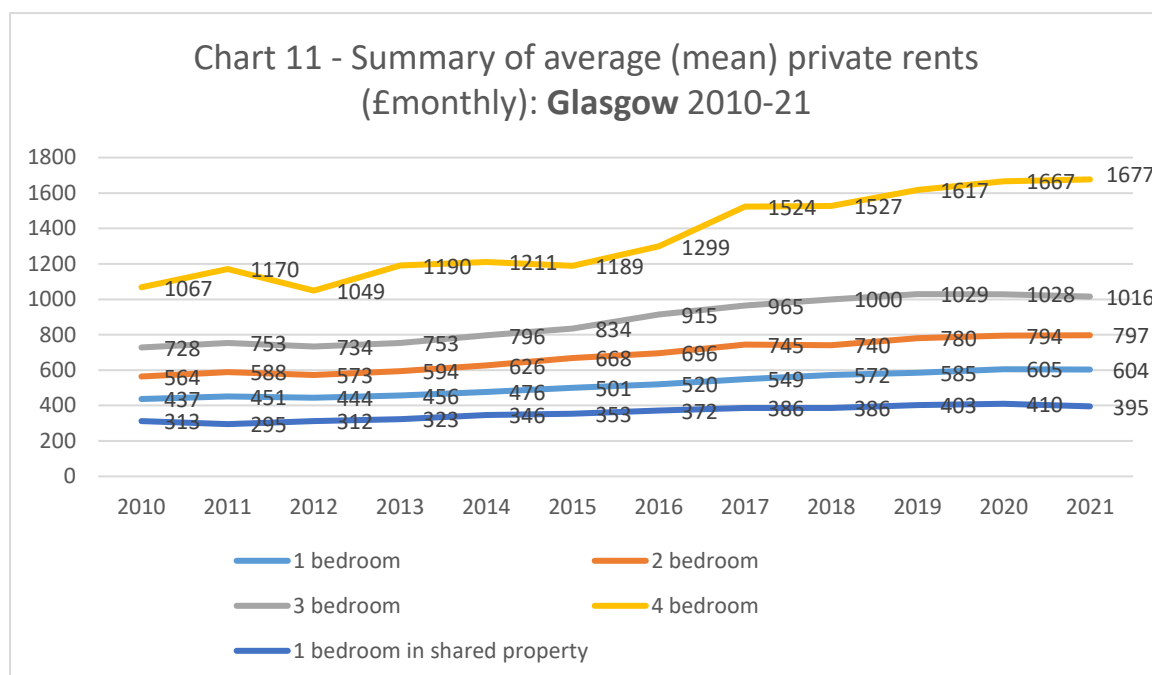


Chart 10 illustrates between 2010 and 2021, BRMA data signifying Scotland's average (mean) rents have increased for all property sizes, ranging from 23.5% for 1-bedroom properties to 44.7% for 4-bedroom properties, taking into consideration CPI inflation of 24.3% over the corresponding period of time (*Scottish Government: Private Sector Rent Statistics, 2021*).



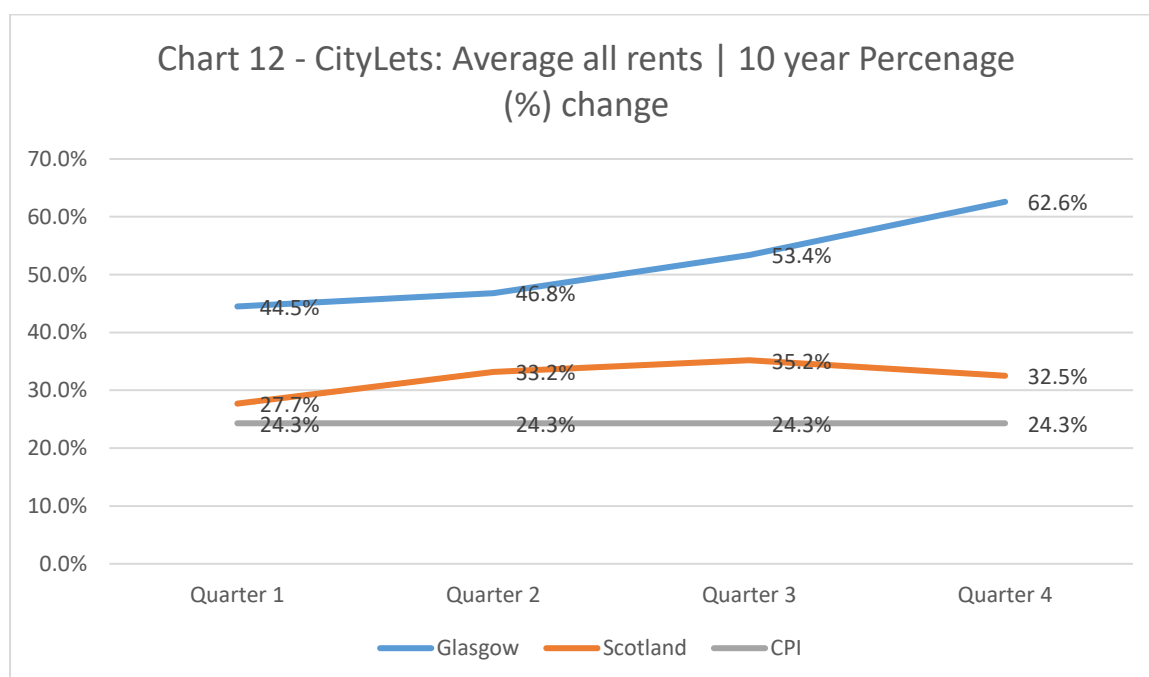
## 5.8.6



When compared with Scotland's average (mean) rents, Chart 11 demonstrates Glasgow has similarly seen significant increases over the same period (*Scottish Government: Private Sector Rent Statistics, 2021*).

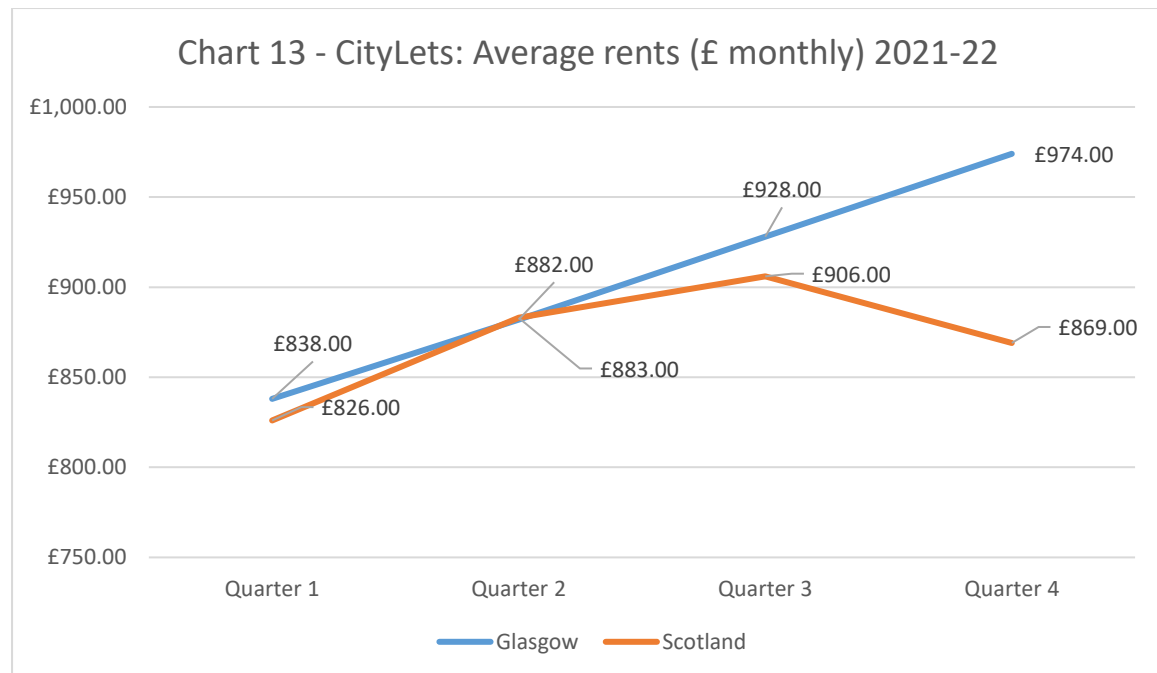
## 5.8.7

BRMA data suggests Glasgow's increases ranging from 26.3% for 1-bedroom shared properties, to 57.1% for 4-bedroom properties. Separately, CityLets data suggests a considerable 62.6% increase in Glasgow's average rent levels (all rents) over the previous ten years (*City Lets: Quarterly Reports, 2021-22*).



### 5.8.8

Chart 13 CityLets data indicates Glasgow's average PRS rents may have increased from £838 to £974, an increase of £136. When compared with Scotland, which has seen an increase of £43; £826 up to £869 (*City Lets: Quarterly Reports, 2021-22*).



### 5.8.9

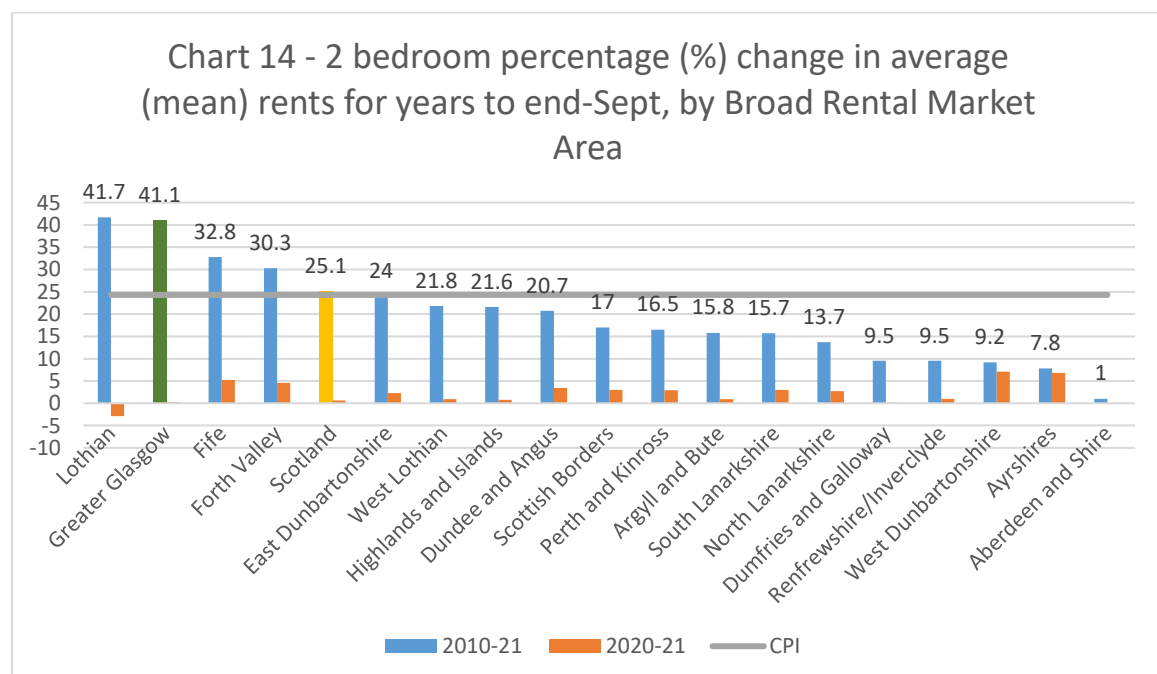
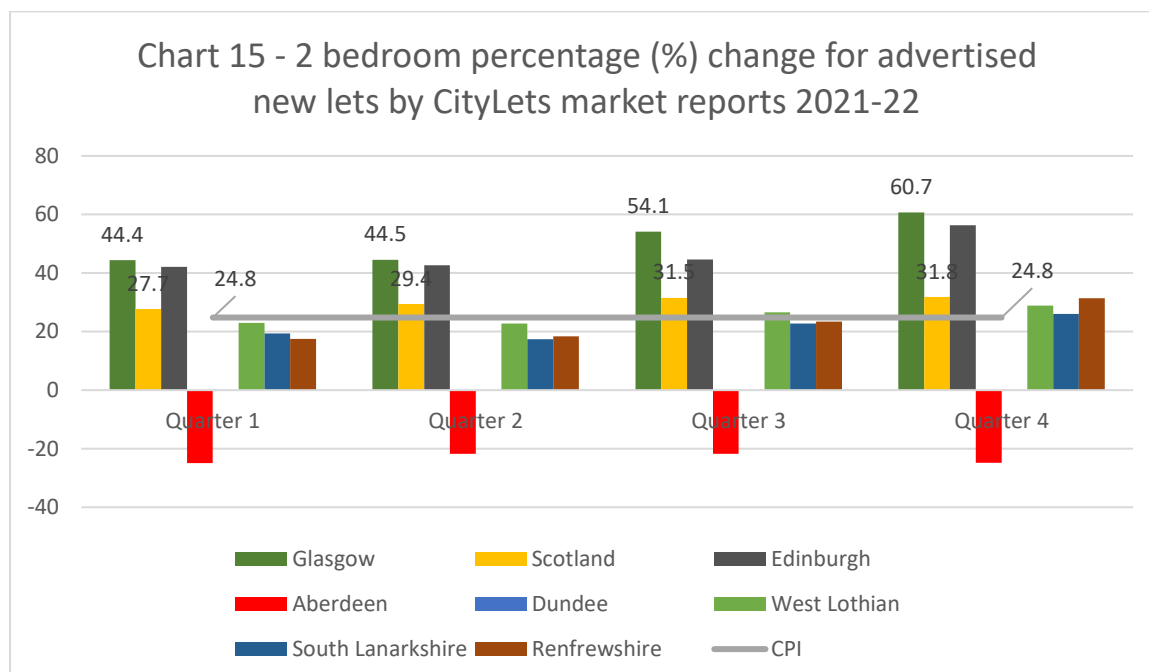


Chart 14 suggests the average (mean) 2-bedroom rents in Greater Glasgow have been consistently higher than the Scottish average since 2015. The average rent in 2021 being £797 per month, compared to the Scotland average of £693. In addition, **BRMA data indicates a 41.1% increase between 2010 and 2021** (*Scottish Government: Private Sector Rent Statistics, 2021*).

### 5.8.10

In comparison, Chart 15 illustrates **CityLets data, based on advertised new lets, suggests a 60.7% increase over the same corresponding period** (*City Lets: Quarterly Reports, 2021-22*).



### 5.8.11

With over 107,000 social rented homes in Glasgow, and an annual turnover of approximately 8%. It is evident that **a lack of supply of affordable social housing in Glasgow combined with stagnating turnover, are continuous significant drivers of demand for Glasgow's PRS, and consequently exacerbates rent levels**. However as previously outlined within this report, these are not the only factors.

### 5.8.12

The Commission acknowledged the existence of several models of rent controls across Europe. CaCHE recently published their [Rent control: principles, practicalities and international experience: Briefing paper](#) which was shared with members.

### 5.8.13

Combined with prioritising and building affordable social housing, rent controls can be a sustainable approach towards alleviating increasing rental costs in Glasgow. The Commission believes a points-based method, based on property standard and/or condition, will incentivise landlords to invest in their properties, as a means of justifying rent levels. Subsequently, this will improve the quality of PRS housing and standards of management.

The Commission agreed **Glasgow City Council should consider the measured implementation of points-based rent controls in neighbourhoods/wards where appropriate.**

In the absence of robust rental data and appropriate powers, there must be a commitment to work in partnership with the Scottish Government and supporting stakeholders to appropriately resource requirements to be put in place.

#### 5.8.14

##### Case Study 4 – Living Rent: Unacceptable Rent Increases

The **landlord increased the rent by 21%**. When we contacted him about this, and he said, *‘I can’t be expected to stand still while the market moves on.’*

The rent hike left us with no option but to use the Scottish Government’s only mechanism for redress and refer the increase to the Rent Officer. We demonstrated how comparable properties in the area were available for the same rent we pay, often a few pounds less a month. We provided examples of faults within the flat:

- the broken window levers in the bedroom that create a terrible draft;
- the cracked bathroom sink and the grout around the tiles that’s totally deteriorated with mould;
- the fact that our second “bedroom” is not big enough to fit a single bed in it without making it impossible to open the door (if you’re buying a flat, they refer to these rooms as ‘utility rooms’ or ‘walk in cupboards’);
- the hole in the wall left by a “cowboy plumber” the landlord got in for cheap.

Eventually, the Junior Rent Officer determined that the ‘open market rent’ for our property was £790 a month. They don’t explain how they’ve come to this determination; they don’t say whether, or how, or to what extent they take into consideration all the evidence we provided.

Case Study 4 demonstrates an example of a significant rental increase in spite of the property clearly failing the Repairing Standard. In addition, an unsighted assessment undertaken by the Rent Officer seemingly justifying the rent without taking property condition into consideration.

#### Affordability

#### 5.8.15

The average household income for Scotland’s PRS is £24,800, whereas in comparison Glasgow’s net household income for the PRS is £22,700 (*Scottish Government: Scottish House Condition Survey 2016-2018*). It is acknowledged this will be marginally greater today.

#### 5.8.16

There is not one universally accepted definition of rent affordability. The Scottish Government has acknowledged concerns with rent affordability across the sector and committed to working towards a unified understanding.<sup>21</sup>

#### 5.8.17

It is often considered across Scotland’s housing sector that rents are generally ‘unaffordable’ where a household is paying in excess of 30% of their weekly income on rent. Taking into consideration Glasgow’s average PRS net household income (£22,700), and the average Glasgow 1-bedroom (£604), 2-bedroom (£797), 3-bedroom (£1,016) and 4-bedroom (£1,677) PRS rent based on BRMA

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<sup>21</sup> ‘A New Deal for Tenants’ Rented Sector Strategy - <https://www.gov.scot/news/a-new-deal-for-tenants/>

data (see Chart 11), it would suggest that **a substantial number of Glasgow PRS household rents could be considered ‘unaffordable’**.

### 5.8.18

The Commission acknowledge that for many there is an element of personal choice, whereby PRS tenants have the opportunity to choose to pay higher rental costs for access to a better housing quality standard, improved access to amenities etc. However, **there continues to be barriers and challenges for lower-income individuals and families, as rents continue to become increasingly more unaffordable**. Consequently, a lack of affordable social housing options limits many individuals and family’s ability to consider appropriate housing options.

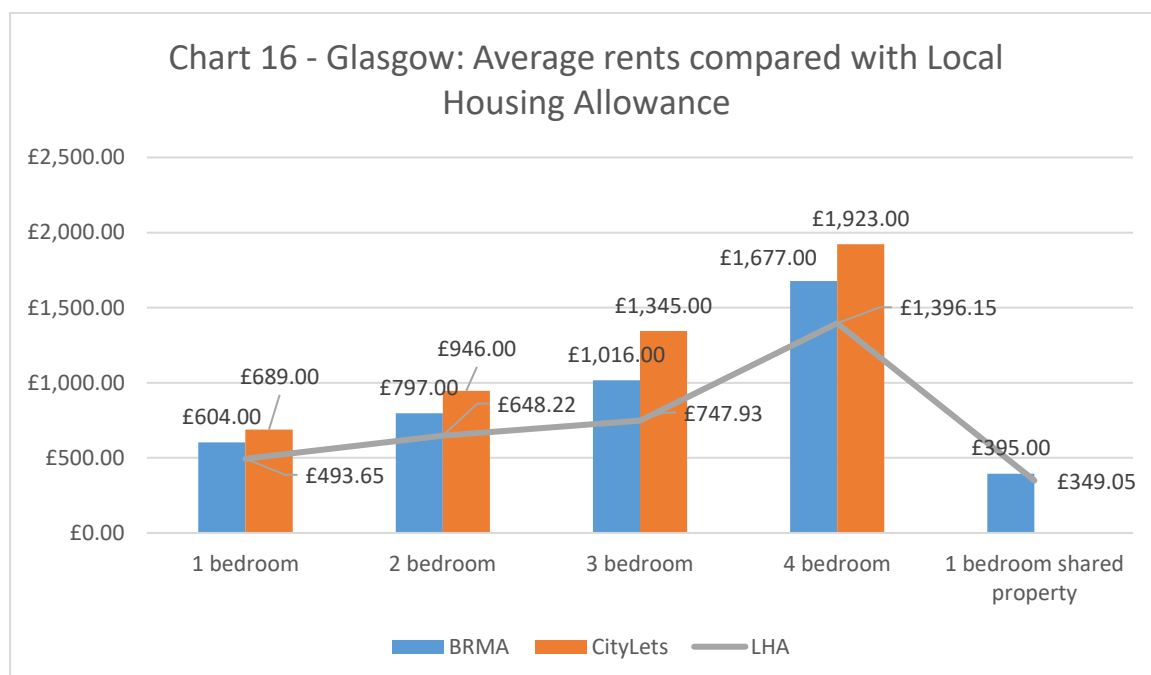
### 5.8.19

As illustrated in Chart 2, most of Glasgow’s PRS housing stock is 2-bedroom properties. Since 2010, **rental data indicates Glasgow’s average 2-bedroom property rents having increased between anywhere between 40.1% and 60.7%, a minimum £233 increase. An increase ranging between 15.8% to 36.4% above corresponding inflation.**

### 5.8.20

Further exploration is required to determine whether or not an increase in Glasgow rents correlates with an increase in LHA in 2020. However, there are practical examples of landlords using this as an incentive (see Case Study 2).

LHA does not cover the full cost of rents for those qualifying for housing benefit, however, it is evident the gap between LHA rates and Glasgow’s PRS rents are widening (see Chart 16).



### 5.8.21

In the absence of a definition of affordability, the Commission highlighted positive practice examples of Scotland’s social landlords using rent affordability toolkits to proactively engage their tenants in rent setting discussions as a means of demonstrating viability whilst supporting tenants. Consideration should be given to the potential role these could play in Glasgow’s PRS.

## 5.8.22

### Case Study 5 – Living Rent: Rent Arrears and Evictions

Niki's work was shut during Covid, **he fell into 1-month of arrears**, the landlord turned up at his flat on Niki's birthday and removed the front door off its hinges, Leaving Niki to barricade himself in his flat on the night of his birthday.

Niki explains, *'I received harassment, threats, slurs I lived with serious anxiety during the whole rest of the week, and I still find it hard to feel safe. The distress generated by this episode, added to the threats I received on the street some days later by the landlord generated great amounts of fear for my safety and especially my girlfriend's safety'.*

After the eviction, the landlord went AWOL. The case was brought to a tribunal. The tribunal ruled that the sum of compensation that Niki was entitled to was zero pounds. This is due to an antiquated law calculating damages for illegal eviction.

Case Study 5 demonstrates an example of an illegal eviction. However, it also highlights how quickly tenants can fall into rent arrears, with landlords ready to seek recovery of the property, rather than offering support to tenants to sustain their tenancy.

### Fuel Poverty

## 5.8.23

In Scotland, "the Fuel Poverty Act" defines fuel poverty as having two elements. A household is considered fuel poor if:

- *after housing costs* have been deducted, more than 10% (20% for extreme fuel poverty) of their net income is required to pay for their reasonable fuel needs; and
- after further adjustments are made to deduct childcare costs and any benefits received for a disability or care need, their remaining income is insufficient to maintain an acceptable standard of living, defined as being at least 90% of the UK Minimum Income Standard (MIS)

*(Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019)*

## 5.8.24

The Scottish Government, reported that 25% of Glasgow's households as being in fuel poverty. However, when compared to the PRS, approx. 40% of households are in fuel poverty. Of which, 23% are in extreme fuel poverty (*Scottish Government: Scottish House Condition Survey 2016-2018*).

## 5.8.25

The Commission welcomed input from the Energy Savings Trust (EST) and Home Energy Scotland (HES) focused on decarbonisation costs and challenges for PRS tenants and landlords.

Although the Commission acknowledged a fabric-first approach as being fundamental to maximising energy efficiency in Glasgow's tenement housing stock; concerns were raised where many tenants continue to navigate fuel poverty. Furthermore, as landlords invest in their properties, it was highlighted that many tenants may be forced to decant their homes to allow for the installation of

energy efficient and carbon reducing measures. **The Commission underlined the importance for tenants have access to information, advice, and support** to navigate these challenges.

### 5.8.26

The Commission noted **a lack of existing evidence and/or qualitative research to understand tenants' personal experiences and specific fuel poverty challenges within Glasgow's PRS**. However, it was suggested that this could be a potential focus of a future commission.

## 5.9 Recommendations

### 5.9.1

The Glasgow Tenant-Led Housing Commission (Private Rented Sector) proposes the following sixteen recommendations for consideration by Glasgow City Council.

We believe our recommendations address a number of fundamental issues and challenges that will, improve the quality of housing, and standards of management within Glasgow's private rented sector housing.

<b>Affordable Housing</b>	<b>1.</b> Glasgow City Council to prioritise affordable social housing development across all sites through a review and reform of local planning policy and/or guidance.
<b>Landlords</b>	<b>2.</b> Glasgow City Council to utilise the landlord registration database to communicate and upskill landlords (e.g., training opportunities); whilst exploring other means to provide guidance and support to landlords not accessing the landlord advice service.
<b>Landlord Enforcement</b>	<b>3.</b> Glasgow City Council to increase resources and staffing to introduce a proactive approach to property inspections, and subsequent enforcement action, to increase the quality of PRS housing and standards of management.
	<b>4.</b> Glasgow City Council to establish a joint network of partnership organisations to maximise property inspections and means of identifying properties that fall below minimum standards (e.g., Police Scotland, Scottish Fire and Rescue Services, etc.).
<b>Tenants</b>	<b>5.</b> Glasgow City Council to establish a tenant-led forum/platform for meaningful engagement with Glasgow's private rented sector tenants.
	<b>6.</b> Glasgow City Council to work with stakeholder organisations to identify opportunities to support and upskill tenants to communicate confidently and influence the housing services they receive.
<b>Tenancy Deposits, Disputes and Evictions</b>	<b>7.</b> Glasgow City Council to develop and deliver a training programme for stakeholder organisations, focused on identifying and dealing with illegal evictions to encourage intervention and support when required.

<b>Accessibility and Adaptations</b>	<b>8.</b> Glasgow City Council to work with stakeholder organisations to assess existing PRS stock, to determine how many tenants are living in unsuitable accommodation. Thereafter, tenants should be supported, in partnership with stakeholder agencies, to access properties that meet their needs, creating more sustainable tenancies.
	<b>9.</b> Glasgow City Council to develop an intermediary register of landlords with adapted, accessible, and approved PRS properties to reduce the number of tenants in unsuitable accommodation.
<b>Housing and Welfare PRS Support Hub</b>	<b>10.</b> Glasgow City Council to recognize the increasing demand for the integral Housing and Welfare PRS Support Hub service and continue to appropriately resource this essential service.
	<b>11.</b> Glasgow City Council to expand the current scope of this service to the wider PRS sector to ensure referrals are open to everyone.
<b>Quality of Housing and Standards of Management</b>	<b>12.</b> Glasgow City Council to utilise Enhanced Enforcement Area status and powers in similar areas of high density PRS households as a means of addressing and improving poor quality housing and standards of management.
	<b>13.</b> Glasgow City Council to commit resources to the development and establishment of tenants' and residents' groups/associations within mixed tenure (e.g., tenement) housing stock, to proactively communicate and address cyclical maintenance and repairs, as well as nurturing a sense of community.
<b>Rents and Affordability</b>	<b>14.</b> Glasgow City Council to work in partnership with the Scottish Government to introduce a robust and measured approach to a points-based system of rent controls, based on property standard and/or condition, to incentivise landlords to invest in their properties, as a means of justifying rent levels. Subsequently, improving the quality of PRS housing and standards of management.
<b>Students</b>	<b>15.</b> Glasgow City Council to work in partnership with stakeholder organisations to safeguard students' welfare and ensure students are not "priced out" of education due to a lack of affordable housing options.
<b>Discrimination</b>	<b>16.</b> Glasgow City Council to work in partnership with stakeholder organisations to proactively identify and eradicate discriminatory practices across Glasgow's PRS.

## 6. Conclusion

The Commission would like to thank its members and TIS for their support in producing this report.

We trust our recommendations will deliver improvements in the quality of housing and standards of management within Glasgow's private rented sector housing.



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<https://www.citylets.co.uk/research/reports/>

## 8. Appendix 1 – Register of Stakeholder Contributions

Date	Organisation	Focus
22 <sup>nd</sup> September 2021	<b>Tenants Information Service (TIS)</b>	<ul style="list-style-type: none"> <li>• Orientation</li> <li>• Terms of Reference</li> <li>• Code of Conduct</li> <li>• Project Plan</li> </ul>
27 <sup>th</sup> October 2021	<b>Glasgow City Council: Housing and Regeneration Services Strategy</b>	<ul style="list-style-type: none"> <li>• Housing Trends in Glasgow</li> <li>• Strategic approach in Glasgow</li> <li>• Regulation and enforcement</li> <li>• Support and assistance</li> <li>• Key issues and considerations</li> </ul>
27 <sup>th</sup> October 2021	<b>UK Collaborative Centre for Housing Evidence (CaCHE)</b>	<ul style="list-style-type: none"> <li>• PRS sub-markets</li> <li>• Key challenges faced by low income and other vulnerable private tenants</li> <li>• How do these housing drivers affect people's ability to live a "good life"?</li> <li>• What needs to change?</li> <li>• Research gaps</li> </ul>
24 <sup>th</sup> November 2021	<b>Glasgow City Council: Housing and Regeneration Services Private Landlord Registration and HMO Licensing</b>	<ul style="list-style-type: none"> <li>• Total registrations</li> <li>• Registrations per neighbourhood</li> <li>• Landlord residency</li> <li>• Enforcement action</li> <li>• Challenges with property conditions and disrepair</li> </ul>
15 <sup>th</sup> December 2021	<b>Tenants Information Service (TIS)</b>	<ul style="list-style-type: none"> <li>• What have we learned so far?</li> <li>• What don't we know?</li> <li>• What do we need to know?</li> </ul>
26 <sup>th</sup> January 2022	<b>SafeDeposit Scotland</b>	<ul style="list-style-type: none"> <li>• Pre-pandemic Vs Post-pandemic</li> <li>• Average deposit value</li> <li>• Disputes</li> <li>• Self-resolution</li> </ul>
26 <sup>th</sup> January 2022	<b>Shelter Scotland</b>	<ul style="list-style-type: none"> <li>• Common issues for tenants in Glasgow's PRS:</li> <li>• Affordability</li> <li>• Disrepair</li> <li>• Evictions</li> </ul>
23 <sup>rd</sup> February 2022	<b>Glasgow City Council: Housing and Welfare Team (the PRS Support Hub)</b>	<ul style="list-style-type: none"> <li>• Prevention of homelessness (housing options)</li> <li>• Improved financial position (tackling poverty)</li> <li>• Positive health and wellbeing (personal needs)</li> <li>• Improved safety and quality of home</li> </ul>
23 <sup>rd</sup> February 2022	<b>Positive Action in Housing</b>	<ul style="list-style-type: none"> <li>• Empowering people with information, advice and targeted practical support</li> <li>• Challenging unfair decisions and processes that make people's lives harder in Glasgow's PRS</li> </ul>

		<ul style="list-style-type: none"> <li>• Discrimination</li> </ul>
30 <sup>th</sup> March 2022	<b>The Scottish Association of Landlords (SAL)</b>	<ul style="list-style-type: none"> <li>• Aims</li> <li>• Information and support</li> <li>• Campaigns and lobbying</li> <li>• Challenges for landlords</li> <li>• Experience</li> </ul>
27 <sup>th</sup> April 2022	<b>Glasgow Centre for Inclusive Living (GCIL)</b>	<ul style="list-style-type: none"> <li>• Key Principles and Values</li> <li>• Medical Vs Social Model of Disability</li> <li>• Research and Reports</li> <li>• GCIL Housing Service</li> <li>• Accessible housing demand</li> <li>• Information, Advice &amp; Advocacy</li> <li>• GCIL Approaches</li> </ul>
27 <sup>th</sup> April 2022	<b>Energy Savings Trust</b>	<ul style="list-style-type: none"> <li>• Decarbonisation cost challenges</li> <li>• UK Government- Heat and Buildings Strategy</li> <li>• Scottish Government Heat in Buildings Strategy</li> <li>• Impacts on electric and gas fuel prices</li> <li>• Heat pump v gas boiler efficiency</li> <li>• Energy Saving Trust /Home Energy Scotland (HES) support</li> </ul>
25 <sup>th</sup> May 2022	<b>Living Rent</b>	<ul style="list-style-type: none"> <li>• Who are Living Rent?</li> <li>• What does Living Rent do?</li> <li>• Why is Glasgow experiencing a housing crisis?</li> <li>• Problems affecting tenants</li> <li>• Living Rent demands</li> </ul>
25 <sup>th</sup> May 2022	<b>Tenants Information Service (TIS) / Tenant-Led Housing Commission</b>	<ul style="list-style-type: none"> <li>• Glasgow's PRS rents</li> <li>• Local Housing Allowance (LHA)</li> <li>• Broad Rental Market Areas (BRMA)</li> <li>• CityLets rental data</li> </ul>

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