**Disability Rights UK response to:**

**“Social housing rents”**

**Open consultation 2022**

Disability Rights UK is a national organisation led by Disabled people. Our vision is a world where Disabled people have equal rights, opportunities, and access to power. Our work is rooted in the lived experience of Disabled people. We are a membership organisation and work closely with organisations led by Disabled people across the UK.

Our response outlines our demand to see a full rent freeze and a freeze on service charges across the Social Housing Sector (SHS). We also outline our desire to see the Government take further action to ensure Social Housing providers can provide high-quality housing and services.

We want to see this action ahead of what will be a very difficult winter for millions of us.

Disabled people are disproportionately impacted by inequalities – ranging from a greater likelihood of living in poverty to being less likely to be able to access education and employment, amongst other things.[[1]](#footnote-2)

Disabled people are very reliant on SHS. In the year to June 2021, just over half (53.3%) of non-disabled people owned their own homes, compared to 39.7% of Disabled people. At the same time, a quarter (24.9%) of Disabled people rented social housing, compared to 7.9% of non-disabled people.

The housing sector is a dangerous mess for Disabled people. Rents across all tenures are outstripping salaries, and benefits continue to rise. Right now, 54% of all renters share that they are worried about their ability to pay the rent[[2]](#footnote-3). The Government is responsible for using its power to protect tenants from the dangerous consequences of this crisis.

**Key recommendation:** **The Government imposes a Rent Freeze on all social housing, affordable housing rents and service charges.**

**There is no acceptable, just, or fair way to raise tenant rents or service charges.**

Disabled renters must be protected from the dangerous consequences of the cost-of-living crisis. We do not agree that Registered Providers should be permitted to increase rents by up to CPI+1% or by 5%. The Government must impose emergency measures that stop rents or service charges from rising at all.

We strongly agree with the response from other Disabled People’s Organisations, such as Inclusion London, that social housing, affordable rents and service charges should not only be frozen next year but the freeze should be extended up to 31 March 2025.

When half of all people living in poverty are either Disabled people or have a Disabled person in the household, then there is no way in which a rent rise, especially as the Government has yet to announce concrete plans to uprate benefits, can be justified. Disabled renters should not be left to cover the increased costs of housing providers through their own pockets.

The Government should focus on protecting tenants from the dangerous consequences of this crisis. Social Rented housing is often a lifeline for Disabled people. Data analysis[[3]](#footnote-4) by Habinteg showed that households, including a Disabled person, are more likely to be in the social rented sector than other households.

Even before the COVID pandemic and the cost-of-living crisis, rent arrears among housing association tenants and residents were building at around 10% annually. Between March 2018 and March 2021, rent arrears grew from £591m to £704m[[4]](#footnote-5).

If no cap is imposed, more Disabled tenants will be forced to leave their homes and look to finding solutions within the private rented sector.

Here they will encounter many dangerous, demoralising and unfair barriers. From the formal and informal policies and practices from private landlords and letting agents in regard to those who receive benefits (Disabled people are three times more likely to be in receipt) to the fact that only 9% of homes in the UK provide features that are accessible[[5]](#footnote-6), this option is simply unsustainable for most Disabled people.

Furthermore, the Disability Employment Gap continues to rise, now standing at 28% (54% of disabled people are employed and 82% of non-disabled people)[[6]](#footnote-7). And we know how important a good quality consistent housing situation is in closing this gap.

As the EHRC detailed in 2018[[7]](#footnote-8), Disabled people reported improved health and well-being and enhanced prospects for employment and study where their homes met their accessibility requirements. Disabled people living in inaccessible homes are four times more likely to be unemployed.

We support a Rent Freeze because Disabled tenants could still see their service charges go up even if social housing rent increases were capped, thus offsetting the benefits of any rent cap.

We know that social landlords could face an increase in costs to be able to invest in existing and new housing stock and could be, therefore inclined to roll their costs into service charges for tenants. This would make any rent cap redundant, further tighten Disabled people’s household finances and increase the cost of housing benefits.

A rent freeze will keep Disabled people in their homes or allow them to move into new social rented ones. Disabled people deserve a safe, accessible home in which their lives can flourish, and a rent and service charge freeze is the best solution to giving us this platform.

**Recommendation 2:** **The Government distributes a capital grant to social housing providers so they can increase the level of service, maintenance and repair in properties.**

Despite needing urgent reforms, and with much work to do to improve standards, the social housing sector has higher accessibility and quality standards than the private rented sector.

Many providers in the sector have reported that the current crisis is driving up their costs and will lead them to be unable to provide the level of service or maintenance required to keep Disabled tenants safe.

Shockingly 13% of privately rented homes had a Category 1 hazard in 2019, compared with 5% of all social rented homes[[8]](#footnote-9). We cannot allow Disabled people to be at the mercy of the poor standards and practices of the private rented sector or allow standards in the social rented sector slip.

We deserve to live in safe, affordable and accessible homes and the Government must support providers to create them.

We want to see the Government allocate funding to social housing providers so they can carry on their statutory duties. And even invest further in creating more accessible, more thermally efficient and safer homes for Disabled and non-disabled tenants.

**Recommendation 3: Abolish the bedroom tax.**

With the Government proposing a CPI+1% policy subject to a 5% ceiling from 1 April 2023 to 31 March 2024 what needs to be remembered is that many social housing tenants were already in financial difficulty before the cost-of-living crisis began. This is partly due to the introduction in 2013 of the ‘bedroom tax’ (“spare room subsidy”).

The bedroom tax restricts the size of accommodation that universal credit or housing benefits can cover the social housing rental costs based on the number of people in a household.

If under these rules, it is decided that you have one or more spare bedrooms, your total ‘eligible rent’ (the maximum amount that could be covered by the universal credit housing costs amount or by housing benefit) will be reduced by:

* 14% if you have one spare bedroom; and
* 25% if you have two or more spare bedrooms.

A parliamentary written answer of [5 September 2022](https://qnadailyreport.blob.core.windows.net/qnadailyreportxml/Written-Questions-Answers-Statements-Daily-Report-Lords-2022-09-05.pdf) by Baroness Stedman-Scott outlined that a total of 48,100 tenants were subject to the bedroom tax.

Disabled people form most of those who are affected by the bedroom tax. [More than two thirds](https://questions-statements.parliament.uk/written-questions/detail/2019-09-02/284641) of those housing benefit claimants subject to the bedroom tax are in receipt of a sickness or disability benefit.

Yet Disabled people are more likely to need their own room and to rely on benefits. They are less able to move to different adapted or suitable accommodations given the shortage of these social providers.

Any increase in rent to this group increases the rent shortfall they need to make up. While a Discretionary Housing Payment (DHP) support scheme is operated by local councils, it is cash limited by Government. And subject to other calls, for example, by those affected by the benefit cap or local housing allowance restrictions.

In addition, any DHP award is time limited and often needs to be applied for annually. We want to see the Bedroom Tax abolished so that Disabled people can access the housing we deserve.

**Recommendation 4: Build more social rented homes.**

Despite a recent review undertaken by the [Charted Institute of Housing](https://www.ukhousingreview.org.uk/ukhr22/index.html) showing that the Government has not been building enough Social Rented homes to cover the current shortfall, the current consultation makes no effort to address the connection between rent levels and a lack of supply[[9]](#footnote-10). Implementing the Right to Buy policy has meant that those “who cannot afford to buy, are unable to access housing locally or are limited to accommodation that fails to meet their needs.”

In 2018, the Joseph Roundtree Foundation (JRF), released a report which showed that nearly 600 additional low-cost rented homes need to be built every week “in order to fix the broken housing market and help low-income families escape poverty”[[10]](#footnote-11). We want to see the Government take urgent action to support local councils and housing associations to build social rented homes across the country.

The current targets are too low. And we urgently need to build new, accessible and affordable homes. Social rented homes provide Disabled tenants with security of tenure. This allows them to request the adaptations they need without the outsized risk of eviction they face in the private rented sector.

Over 1 million households are waiting for social homes[[11]](#footnote-12). Disabled people rely more on the social housing system than non-Disabled people, and we want to see urgent action to tackle the social housing deficit, cut waiting times and finally provide Disabled people with the homes we deserve.

1. Outcomes for disabled people in the UK: 2021, ONS, 2022, <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/outcomesfordisabledpeopleintheuk/2021> [↑](#footnote-ref-2)
2. Tenants should not pay if rents go up next year, SHAC says, Inside Housing, 2022 https://www.insidehousing.co.uk/news/tenants-should-not-pay-if-rents-go-up-next-year-sahc-says-77671 [↑](#footnote-ref-3)
3. Habinteg: The Hidden Housing Market, 2016, https://www.habinteg.org.uk/hidden-housing-market/ [↑](#footnote-ref-4)
4. Tenants should not pay if rents go up next year, SHAC says, Inside Housing, 2022, https://www.insidehousing.co.uk/news/news/tenants-should-not-pay-if-rents-go-up-next-year-shac-says-77671 [↑](#footnote-ref-5)
5. Accessibility of English homes - English Housing Survey, 2019, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/898205/2018-19\_EHS\_Adaptations\_and\_Accessability\_Fact\_Sheet.pdf [↑](#footnote-ref-6)
6. Disability pay gaps in the UK: 2021, ONS, 2022. https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/disabilitypaygapsintheuk/2021#:~:text=1.-,Main%20points,less%20than%20non%2Ddisabled%20employees [↑](#footnote-ref-7)
7. Housing and disabled people Britain’s hidden crisis, EHRC, 2018,https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-britains-hidden-crisis-main-report\_0.pdf [↑](#footnote-ref-8)
8. Commons Library Report, 2022, https://commonslibrary.parliament.uk/research-briefings/cbp-7328/ [↑](#footnote-ref-9)
9. UK Housing Review 2022 shows England’s Right to Buy is a “strategic failure” and will exacerbate inequalities if left unchecked, CIH, 2022, https://www.cih.org/news/uk-housing-review-2022-shows-england-s-right-to-buy-is-a-strategic-failure-and-will-exacerbate-inequalities-if-left-unchecked [↑](#footnote-ref-10)
10. Government plans fall short of 600 extra low-cost rented homes a week needed ,JRF, 2018, https://www.jrf.org.uk/press/government-plans-fall-short-600-extra-low-cost-rented-homes-week-needed [↑](#footnote-ref-11)
11. Social housing deficit, Shelter, 2018, https://england.shelter.org.uk/support\_us/campaigns/social\_housing\_deficit [↑](#footnote-ref-12)