



GWSF COMMENTS ON THE SCOTTISH GOVERNMENT'S DRAFT NATIONAL STRATEGY FOR HOUSING FOR OLDER PEOPLE

1. INTRODUCTION

- 1.1 GWSF is the leading membership body for community-controlled housing associations and co-operatives (CCHAs) in Glasgow and the West of Scotland.
- 1.2 We have 55 members who provide affordable, quality rented housing for around 75,000 households in the region, based on community ownership and governance.
- 1.3 All of our members house significant numbers of older people in “mainstream” tenancies, and provide property-related services such as housing adaptations. Many CCHAs play a much larger role in addressing the housing and support needs of older people, for example through:
 - Sheltered and other specialist housing (e.g. extra care housing and housing for people with dementia)
 - Providing housing support services, either directly or in partnership with others
 - Providing day care facilities for non-residents, as part of housing developments
 - Managing local care and repair projects
 - Employing in-house labour or using subsidiary social enterprise companies to provide small repairs services to older tenants
 - Providing local services to increase take-up of benefits or to address social isolation among older people.
- 1.4 As community-based and community-led organisations, our focus is on meeting the needs of all sections of our communities. We have found the draft Strategy useful in helping to consider how we can sustain and further develop the services CCHAs provide to older tenants and residents.

2. COMMENTS ON THE STRATEGY OVERALL

- 2.1 Our overall views on the draft Strategy are positive. It sets out a clear vision, and the proposed changes in strategic direction are evidence-based and logical. We particularly welcome the emphasis on joining up housing, health and social care issues in a way that is long overdue.
- 2.2 Our major suggestions for further development before the Strategy is finalised all relate to delivery issues, to ensure that policy can be translated into tangible services and outcomes on the ground. In particular, would suggest that the final version of the Strategy should be more explicit about:

- Future actions and programmes;
- How delivery of the various parts of the Strategy can be achieved when Government and other public spending is being cut so substantially;
- How institutional barriers to shifting the balance of care and services can be overcome, and whether the Government needs to develop stronger levers to make fundamental changes a reality.

2.3 These points are reflected in our detailed comments about the individual sections of the Strategy.

3. STRATEGY SECTIONS ON VISION AND COMMITMENTS

- 3.1 The draft Strategy sets out a clear vision, and we support all five of the high level outcomes that are described.
- 3.2 Strategic leadership on housing outcomes is a key issue. The experience of many of our members is that local strategic structures do not give enough priority to the role of housing, or harness the potential contribution of local housing providers in the most effective way. Addressing these issues is crucial to the whole of the draft Strategy.
- 3.3 We welcome the strong emphasis the Government is placing on lower-level, preventative services. The draft highlights the risk of such services being marginalised when statutory services are under financial pressure. But we also think the challenges involved here are only partly financial. Of equal importance is the value that the statutory health and social providers place on these types of services, and how this translates into commissioning/spending decisions and partnerships with housing providers.
- 3.4 The Strategy sets out some bold and radical proposals for change. In that context, carrying out the first major review of progress in 2016 is too far in the future in our view.
- 3.5 We also think the final Strategy would have more “bite” if it were backed up by a more detailed action plan and if it set more explicit outcomes to be achieved locally on shifting the balance of care and spending.
- 3.6 The Change Fund is a good start towards this, but it accounts for a very small fraction of total spending on older people’s services.

4. STRATEGY SECTION ON CLEAR STRATEGIC LEADERSHIP

- 4.1 The draft Strategy is very light overall on Government’s role in providing funding and on the level of financial commitment it will make available. Instead, it sets a very broad financial context (e.g. growing demands for services, reducing public spending, the need to find solutions that make more effective use of existing resources).

- 4.2 We think the final Strategy needs to say much more about the financial aspects of delivery, in particular the affordability of the various actions proposed now that the Spending Review has been completed.
- 4.3 We agree that housing issues need to be much more firmly embedded in wider planning for health and social care. Initiatives such as the Re-Shaping Care policy and the Change Fund are beginning to address that. But in practical terms, there is still a very long way to go.
- 4.4 Feedback from our members participating in local Change Fund structures is that the strategic and financial emphasis at this stage is firmly on acute NHS and re-ablement services. Community-based preventative services, and the contribution housing providers can make to these, are much lower on local agendas than we would have expected.
- 4.5 We note what is said about the role of Local Housing Strategies, but in our members' experience the real issues to be addressed are institutional/cultural and financial.
- 4.6 Firstly, the role of housing and community solutions needs to be genuinely embraced as an integral part of commissioning and financial decision-making and not as a marginal issue.
- 4.7 Secondly, our members' initial experiences of the Change Fund raise real questions about whether the objectives of the Fund are being addressed appropriately in local spending decisions.
- 4.8 While the Government has moved away in recent years from ring-fenced funding, we think this has a vital role to play as a way of driving real change in services for older people. We would like the final Strategy to:
- Give firm commitments about the continuation of the Change Fund beyond 2011/12;
 - Increase the size of the Fund (if need be, by reducing block funding), as a way of driving positive change; and
 - Emphasise the need to target Change Fund monies appropriately, so that community and preventative services as well as health and social care services receive real priority.
- 4.9 The proposal to commission research to demonstrate the case for housing and support is noted. But we are not convinced this is sufficient to embed the need for these services in local decision-making in a much more practical way.

5. STRATEGY SECTION ON INFORMATION AND ADVICE

- 5.1 We agree that access to good quality information and advice for older people is essential. The final Strategy should address the financial and funding issues associated with the proposed actions, since these will be decisive factors in what can actually be delivered.

- 5.2 The development of housing options services for older people is just one example. The principles are sound, but unless properly costed and resourced, there is a risk that commitments of this type will be aspirational rather than deliverable.

6. STRATEGY SECTION ON BETTER USE OF EXISTING HOUSING

- 6.1 The case for investing in adaptations is overwhelming in economic and social terms. We welcome the recognition of this in the draft Strategy and to the need for “fit for purpose” funding arrangements.
- 6.2 However, we are deeply concerned about the lack of “fit” between these aspects of the draft Strategy and the concurrent consultation which suggests the Government may make short-term cuts in adaptations funding arrangements for housing associations in 2012/13.
- 6.3 While spending on adaptations is rising, it represents about 0.5% of total public spending on health and social care services for older people. Cutting funding in this area sends out a negative message to housing providers about the value the Government places on preventative spending. It will also produce negative outcomes for older tenants.
- 6.4 In considering the options for a “fit for purpose” funding system, we suggest there may be a case for placing funding responsibilities for adaptations with health boards, with housing providers acting as their agents in carrying out the works.
- 6.5 This would provide a real impetus for changing the balance of care in line with the Government’s objectives. It could also provide better outcomes for service users, since responsibility for assessment and funding would sit in one place.
- 6.6 The draft Strategy notes the role of the SHQS in raising standards for tenants of social landlords, but does not address what can be done to improve conditions for older people in the private sector (for example, an expanded role for local Care and Repair projects, or investment through grants to older owners living in poor quality housing).
- 6.7 The ideas set out on developing services to assist older people to move home need to be more fully developed. For example, there are a number of references throughout the draft to an expanded role for services provided by social enterprises. We would welcome this, but the feasibility of taking this forward is likely to depend on how such services would generate an income stream in order to be sustainable. This will also apply to the part that social landlords can play in providing such services.
- 6.8 We support what the draft Strategy says about making the best use of specialist housing, and the recognition that new service models for the future can make much better use of “ordinary” housing adapted as required and linked to personal or technology-based support.

- 6.9 We welcome the intention to review the current statutory restrictions on allocations being made with reference to age. The housing regulator has enforced these restrictions in a literal and unhelpful way for the last decade, and they are repeated in the Government's recent practice guide on housing allocations. The overall effect has been to place a major obstacle in the way of common sense allocations decisions that would provide older people with greater social support and an increased sense of security.
- 6.10 The intention to produce practice guidance on how sheltered housing can be redeveloped is noted. But as with other elements of the draft Strategy, we think the final version needs to say much more about the financial challenges this involves and how the policy goal can be delivered in practice.
- 6.11 Similarly, the proposals for investigating new financial models and products do not address the real "bottom line" issues. In particular, to what extent will personal contributions towards meeting housing needs be a matter of individual choice for older people, and to what extent will older people be obliged to make financial contributions if their circumstances allow this?

7. NEW BUILD HOUSING

- 7.1 No comments at this stage.

8. PREVENTATIVE SUPPORT

- 8.1 Along with the section on making the best use of existing housing, this is perhaps the most critical part of the draft Strategy for GWSF members.
- 8.2 We strongly support the policy direction that is set out. Housing associations, community-based social enterprises and third sector organisations must all be seen as major delivery partners for both the Scottish Government and for local statutory service providers.
- 8.3 Community-based housing associations already play a major part in providing or enabling community support for older people. Many are keen to do more in future, for example where statutory services are under financial pressure.
- 8.4 Many housing associations have assets that can be used to support this (physical, organisational, strong relationships with local communities), although this should remain a matter for local decision rather than prescription. We are less clear what practical support the Government might provide, as the only commitment made on this issue is to showcase examples of effective practice by social landlords. This seems unambitious.
- 8.5 The draft Strategy presents a positive picture of the commitment of the statutory health and social services to preventative, community-based services. Our members' experience on the ground does not reflect this, in relation to funding/commissioning decisions and in relation to the way statutory services link with local housing and support service providers.

- 8.6 The final Strategy has an important part to play in promoting the need for all parties, including housing providers, to address these issues. This is particularly important because many of our members providing support and other preventative services have already seen cuts in financial support for these types of services. Accordingly, there is scepticism about whether commissioning strategies see the protection of statutory services as a higher priority.
- 8.7 It would be helpful for the final Strategy to address these issues more directly. Much more is needed than simply creating a better understanding of the importance of housing support and other preventative services. It is also crucial to translate this into real local services that will help older people to continue living independently and with the support they need.

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