



## **Rent Increase 2022/22**

### **Briefing Paper**

#### **Consultation on Proposals January 2021**

At this time of the year we consult with our tenants on the rent increase proposals for implementation from the start of the new Rent Year, 29 March 2021

#### **Background**

Those of you who have been tenants for a number of years will be aware that it is our usual practice to apply a rent rise linked to the Retail Price Index (RPI) as published in November each year. We consulted with tenants on this as part of the original stock transfers of housing stock from Scottish Homes and again in 2010 when there were changes in relation to the conditions of contract around the transfers. There is an annual consultation exercise carried out with all tenants on the increase for that year.

There are some exceptions to the normal increase formula, for example, where properties are newly built and in an estate jointly developed with a partner, we normally have a rent increase in the first two years that keep rents in line for all tenants in the estate.

The feedback from all our exercises and annual reviews to date are that those tenants responding broadly agreed with this approach. We continue to use this approach.



## **Annual Rent Increase Consultation Process**

Over the last couple of years we have introduced some new ways to consult with tenants and we found that we received a better level of response than in the past. The changes have included a telephone survey together with paper and online surveys. We also publish a Rent Special Newsletter after the decision is made on the rent increase to be applied so we can explain how the level of increase was decided. Last year **91.5%** of people responding told us they were satisfied on how we consulted on rents.

This year is a bit different as due to Covid 19 restrictions we can't meet tenants face to face but we have adapted to remote working including undertaking online consultation events. This year we are offering a very wide range of ways to get involved and we hope that there is something to suit everyone. If you have any further suggestions on how you can get your views known please let us know.

## **What's Happening For 2021/21?**

- Newsletter and Paper Survey sent to all tenants
- Online Web Site Survey and consultation promotion
- Consultation Programme promotion on our Facebook Page
- Rent Briefing posted online. We can email it or send out a hard copy to anyone requesting a paper copy- available from 7<sup>th</sup> January 2021
- Survey issued to those tenants where we have an email address
- Sample Telephone Survey between 6<sup>th</sup> and 14<sup>th</sup> January 2021
- Online Rent Focus Group to be held Friday 8<sup>th</sup> January 2021
- Virtual Question and Answer session Monday 11<sup>th</sup> January 2021
- An on request evening telephone call back service if you are not free at other times
- All feedback to be with us by 12<sup>th</sup> January 2021 – but we will still be finalising phone surveys up until 14<sup>th</sup> January 2021.

Results of the consultation exercise will be fed back to the Management Committee to allow them to decide on the increase to be applied.

## **Rent Increase Proposals**

We are looking at detailed financial plans which are set up to ensure that the organisation can meet its commitments and is financially healthy over the short and longer term. We are also trying to take account of the impact of Covid 19 on tenants and the Association. There are other

factors we need to look at. These are the “bigger picture” matters such as Brexit and the current economic situation and more local issues such as arrears levels, rent loss through empty properties, any increase in cost of repairs and more. On initial consideration our current view is that we should look at the following range of options

- 0% ie no increase in rent
- Consumer Price Inflation (CPI) at 0.3%
- Retail Price Inflation (RPI) at 0.9%

We have produced this paper to try to explain how we set rent increases and what factors we need to take into account. We know that you will have questions and views on this so we have tried to pull together the answers to some questions you may have. We also explain how you can make your views known to us or find out more. **These are complex matters and there is no simple way to communicate all the issues. We hope that this briefing note provides you with some useful information and don't be afraid to ask us if you need any further explanation.**

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### How are rent increases usually decided?

The Association normally uses a formula linked to inflation (Retail Prices Index – RPI). We use the RPI rate as at November and the decision is taken in January the following year. Rents are then increased from 29<sup>th</sup> March for the next rent period.

Before this decision is taken each year, and following consultation, the Management Committee has to make sure the money coming into the Association is adequate to ensure that

- Financial obligations can be met eg loans repaid, financial and contractual obligations met and so on
- Investment priorities can be delivered to ensure that we
  - can deliver the investment programme
  - continue to meet the Scottish Housing Quality Standard (SHQS)
  - work towards the 2020 Energy Efficiency Standard Social Housing (ESSH).
  - meet Health & Safety obligations – for example Fire Safety
- A good standard of service continues to be provided to you
- Repairs can be carried out to your homes
- Take account of factors which will impact on how we operate eg rising costs, Universal Credit system and more
- Importantly we also must ensure that rents continue to be affordable
- Improvements to services – eg CHAT visits

This is how rent increases have been set since the Association was set up in 1998.

We operate on the principle of “rent pooling” and do not add a premium to rents for improvements to tenants’ homes. The only exception to this is where there is a first-time installation of central heating and the overwhelming majority of our properties now have central heating. Only a handful of properties do not have central heating and in all cases, this has been as a result of a tenant refusal.

For the vast majority of our tenants there is no additional service charge for landscaping etc. However in some of the new developments, there is a small service charge, eg Baillie Court, Bo’ness, for close cleaning. These charges are related to actual costs.

## What is inflation doing now?



The inflation figures for November 2020 show that both measures of inflation have fallen from October 2020.

The Office of National Statistics (ONS) published November's inflation rates on 16th December 2020.

Inflation Measure	Sept 2020	Oct 2020	Nov 2020
CPI	0.7%	0.9%	0.3%
RPI	1.1%	1.3%	0.9%

Both inflation rates have fallen from last year. \*

\*(CPI Nov 2019 = 1.5% / RPI = 2.2 %)

## What might happen to inflation going forward?

*The answer is that there is no certainty however we have looked at the Bank of England's projections.*

The Bank of England considers inflation rate trends and expects CPI to increase towards this financial year end but to be below its target of 2.0%. They acknowledge that there is great uncertainty on projections at this time. Here is an extract from their November Monetary Policy report

*"Twelve-month CPI inflation increased to 0.5% in September, but remained well below the MPC's 2% target, largely reflecting the direct and indirect effects of Covid on the economy. These include the temporary impact of lower energy prices and the reduction in VAT, as well as some downward pressure from spare capacity. CPI inflation is expected to remain at, or just above, ½% during most of the winter, before rising quite sharply towards the target as the effects of lower energy prices and VAT dissipate. In the central projection, conditioned on prevailing asset prices, inflation is projected to be 2% in two years' time."*

**What does this mean for rents?**

Our long-term projections are based on rents rising at the start of each new rent year at the rate of Retail Price Index Inflation (RPI) plus 1%. As a starting point we use the rate of RPI as at November each year.

However we look at rents year on year to see what level of increase should be applied so please help us by giving your views. 2020 has been an exceptional year because of Covid 19 and we recognise this. To try to minimise impact on tenants the options being consulted on are lower than the usual business plan assumptions



## What are the Scottish Housing Quality Standard (SHQS) and Energy Efficiency Standard Social Housing (EESH), why is it important to meet these and what other things do we need to consider?

### Scottish Housing Quality Standard (SHQS)

In 2004 the Scottish Government introduced a new standard for all housing association and council houses in Scotland. This is the Scottish Housing Quality Standard (SHQS). It includes standards on energy efficiency, kitchens, bathrooms and safety and security. This has had to be funded from rent money and has meant that the Association has had to find the money to pay for it in the timescale required. We did not have to increase rents specifically for this purpose.

The SHQS Standard needed to be achieved by 2015 and maintained beyond this. It was not optional and we delivered it. As at March 2020 91.2% of properties are compliant. The SHQS standard recognises that some things may be beyond the control of the landlord and so are held as “abeyances”. There are 2 areas of current non-compliance for the Association’s stock and this is why properties are not 100% compliant.

1. Where tenants have not agreed to the works eg replacement central heating – in these cases we continue to offer to do the work or carry it out when the property is vacant.
2. Door Entry Systems (DES) where owners in blocks do not agree to participate in improvement works – we continue to engage with owners to try to get their agreement and do the work. We understand that this can be frustrating for tenants in these blocks, but we continue to pursue this and have taken account of DES installations in the financial projections.

### Energy Efficiency Standard Social Housing (EESH 1)

The Energy Efficiency Standard for Social Housing (EESH) is a Scottish Government standard which aims to improve the energy efficiency of social housing in Scotland. It will help to reduce energy consumption, fuel poverty and the emission of greenhouse gases. This can be achieved in many ways including more efficient boilers, improved insulation, new double glazing and more.

We have our EESH programme underway and require to be compliant by December 2020. As at March 2020 we are 90.7% compliant which compares favourably with the progress made by other landlords but we still have some way to go in the coming year to ensure we meet the target and recent and planned works such as boiler replacement are contributing to meeting the target

### Future Standards & Regulations Changes

**Energy Efficiency Standard Social Housing (EESH 2)** When EESH was introduced, a review was proposed for 2017 to assess progress towards the 2020 target and to consider future milestones beyond 2020. Phase 1 of the review was completed in October 2017, assessing progress towards the



2020 target and updating the EESSH Guidance for Social Landlords produced by the Scottish Government. Phase 2 of the Review has been completed and below is an overview of the outcome proposals.

The Scottish Government have proposed future activity for EESSH2, as follows:

- a challenging and aspirational target to maximise the number of social rented homes meeting an EPC B by 2032;
- a minimum energy efficiency standard of EPC D is set for a house to be let, subject to limited temporary exemptions.
- a vision for 2040 for social housing's contribution to realising the fuel poverty, energy efficiency and climate change ambitions of the Scottish Government;

An EPC is an Energy Performance Certificate to show the energy efficiency rating of your home, this is similar to the stickers you might see on your white goods.

### **Fire & Smoke Alarms in Scotland's Homes**

Following the major fire spread through Grenfell Tower the Scottish Government set up a Ministerial Working Group (MWG) to oversee a review of building and fire safety regulatory frameworks in Scotland. Since 2017 the MWG have made fire and smoke alarms in Scottish homes a priority. The requirements were announced early 2019 and incorporated into the Housing Scotland Act 1987. These are outlined below

- Align all rented properties to that of the private rented standard
- Minimum 1 smoke alarm installed in the room most frequently used for general daytime living purposes
- At least 1 smoke alarm in every circulation space (halls & landings)
- At least 1 heat alarm installed in every kitchen
- All alarms to be ceiling mounted and
- All interlinked
- Carbon monoxide detectors in all homes

Initially there was a two year period for compliance and the costs have to be funded from rents. There was an interest free loan available to landlords from Scottish Government to help spread costs and we made a successful application for this but it requires to be paid back. The costs of this additional work is in the region of £1 million. We are progressing well with this work and were on target to complete it by the February 2021 deadline. The Scottish Government announced an extension of the deadline to 2022 and the most recent Covid 19 Level 4 restrictions announced in January 2021 may well delay our ability to complete all the works by February 2021

**Covid 19**

This is the big unknown for most people and organisations but we do know it affects most of what we do. We are already seeing a slow down on our ability to physically carry out repairs and investment works. We are projecting that we will underspend around £1 million on programmed works for 2020/21 because of delays due to restrictions. The Scottish Government have recently said that vaccination of the most vulnerable is unlikely to be carried out before May 2021 so “business as usual” is likely to be some way off. Given this, we think planned works will be delayed so this gives us some scope to offer a lower rent increase. However longer term we may see increasing costs arising from the situation and there may be a reduction in the number of contractors being able to do the work required.

**Brexit**

Implications for materials availability and cost may be an issue as we have now left the European Union.

**Health & Safety**

Again, and on the back of the Grenfell Tower fire, there are implications and changes to fire door specifications, materials and general inspection regimes. Again there will be funding implications with this.

**Financial Position and Lenders’ Obligations**

We are currently in a good cash position but we know that we need monies in place to meet current and future obligations. You can find out more about our financial position by looking at our Annual Accounts which are on our web site. [link](#)

The Association has loans in place with major financial institutions. These loans have conditions attached – known as “covenants”. Basically these restrict some of our financial activities eg how much we can borrow, what we can spend in any period against income received etc. We need to meet these conditions so any decisions on rents must be taken in the knowledge of how these will impact on our covenants. We are satisfied that we can meet these with a lower increase than the business plan assumption for the coming year.

This is quite a technical area and if you are interested in how it works come along to the Rent Focus Group meeting and find out more.

<p><b>What is the rent increase proposal for 2021/22?</b></p>	<p>We are looking at the impact of rent increases from 0% to 0.9%</p> <p>Range of options</p> <ul style="list-style-type: none"> <li>• 0% ie no increase in rent</li> <li>• Consumer Price Inflation (CPI) at 0.3%</li> <li>• Retail Price Inflation (RPI) at 0.9%</li> </ul> <p>We need to look at all the factors outlined above. Then we to make sure that from the decision we make, we can achieve what we need to and take account of tenants' views and priorities</p> <p>No decision has been made yet. This decision will be made at the end of January so your views are very important.</p>
	<p>Our Business Plan sets our estimated income and expenditure over the next 30 years.</p> <p>We are required to continue to meet the Scottish Housing Quality Standard going forward and also meet the EESSH standards in the set timescales. New fire safety works are already underway at a cost in the region of £1 million. However we appreciate that this is a difficult time for most people and looking at our current cash position and the likely slow down of expenditure at least part of 2021/22, we project that we can meet our necessary obligations with a lower than business plan projection rent increase.</p> <p>The feedback that we generally receive is that most tenants want to see the quality of their homes improved as quickly as possible and we believe that continuing to make good quality improvements to your homes is very important. 69.5% of those responding to the 2020/21 Rent Consultation exercise put improving housing as a top priority and 57.8% stated rent affordability was a top priority.</p> <p>We have been successful in seeking grant money and interest free loans available eg for some insulation works but most improvements to homes have to be paid for from rents.</p>

**What would be the difference between 0.0 % or 0.9% increase in rents overall?**



The projected rental income for the current year is £6.2 million. This can vary a bit eg if we acquire more houses, if rent loss due to voids and bad debts are up or down etc

The cash difference between each option is fairly low over the year of increase

The additional income generated at a 0.3% increase is around £19,000 and at a 0.9% increase it is around £57,000. In the short term this is manageable for the year.

However the issue is how this rolls up over the period of the 30 year business plan.

The lower increases mean less money available in the year and there is also a longer term effect as the reduced income “rolls up” over the life of the business plan.

However this could possibly be dealt with by further reviewing the timing of work etc or cutting some service areas. We also recognise that there may a slowdown in works due to factors out with our control. These are issues being considered and your views are welcome. Again this will be discussed at the Rent Focus Group.

## What is the planned level of spend on works to tenants' homes?



The Association plans to spend around £13 million on planned maintenance and improvements to our tenants' homes over the 5 years from 2020/25. This is in addition to the £5 million worth of work undertaken in between 2016 to 2019 which included, external wall Insulation, cavity wall insulation, re-roofing, rendering, windows, doors, gas boiler and electrical works. At this time we have not altered this projection but recognise we will have to revisit this in light of the impact of Covid 19 and other factors

The planned 5 year programme from 2020 to 2025 includes:

Component	Budget	Property Nos.
Insulation/External Rendering/Roofs	£4.2 million	631
Electrical Works Inc Heat/Smoke & CO Alarms	£2.2 million	All stock
Heating – New & Replacement	£1.0 million	559
Kitchens & Bathrooms	£2.3 million	800
Door Entry Systems- new & replacement	£0.5 million	430
Windows & Doors	£0.5 million	179
Other investment & planned maintenance	£2.2 million	All stock

This is a substantial amount of investment in the housing stock and is spread over all our areas of operation. We have also commissioned a stock condition survey to help us target investment. Work has started on this but the results are being delayed due to the impact of Covid 19.

In addition to this we spend in the region of £1.0 million per year on repairs and other maintenance services.

## What does this mean for my rent?



Rents vary by size, type of property and location so it is not possible to give everyone an individual rent figure at this time. When the increase is decided we calculate individual rents and notify tenants of their new rents by letter.

The table below is a useful “ready reckoner” to give you an indication of what the proposed increases may mean for you.

Qualifying tenants will be able to claim housing benefit or the housing element of Universal Credit. We have Sarah Nicolson in the role of Tenancy Sustainment Officer as part of our Tenancy Management Team. If you need help with financial issues affecting your ability to pay your rent, then Sarah or other members of the Team may be able to help.

### Rent Increase Ready Reckoner

	If No Increase	If 0.3% increase	If 0.9% increase
Weekly Rent	0%	0.3%	0.9%
£ 60.00	£ 60.00	£ 60.18	£ 60.54
£ 65.00	£ 65.00	£ 65.20	£ 65.59
£ 70.00	£ 70.00	£ 70.21	£ 70.63
£ 75.00	£ 75.00	£ 75.23	£ 75.68
£ 80.00	£ 80.00	£ 80.24	£ 80.72
£ 85.00	£ 85.00	£ 85.26	£ 85.77
£ 90.00	£ 90.00	£ 90.27	£ 90.81
£ 95.00	£ 95.00	£ 95.29	£ 95.86
£ 100.00	£ 100.00	£ 100.30	£ 100.90
£ 105.00	£ 105.00	£ 105.32	£ 105.95

## How does my rent compare to tenants of other housing associations and local authorities?



	Ochil View	Clacks Council	Link	Falkirk Council	Forth	Stirling Council	Paragon	Weslo
1 bed (2 Apt)	£77.05	£72.14	£79.23	£58.19	£72.86	£64.89	<b>£69.19</b>	£73.79
2 bed (3 Apt)	£83.96	£73.97	£90.79	£68.09	£81.37	£67.18	<b>£76.61</b>	£79.80
3 bed (4 Apt)	£90.98	£75.87	£99.17	£76.13	£88.92	£69.89	<b>£87.73</b>	£87.07
4 bed (5 Apt)	£94.43	£78.07	£108.22	£87.35	£94.89	£71.71	<b>£102.11</b>	£100.81

Rents generally compare favourably and our Rent Affordability Fact Sheet goes into more detail on this. See our Web Site

**How does Paragon know if rents are “affordable” and how can you help if I have problems paying my rent?**



## **AFFORDABILITY AND HIGHER RENT LEVELS**

Affordability is based on the idea that everyone should have access to a warm home that they can afford as the starting point of good health and wellbeing. We appreciate that tenants all have different financial circumstances and obligations.

### **Rents for individuals**

At an individual level we discuss rent payments and obligations with new tenants as they sign up and the Tenancy Management Team are there to help if tenants have problems in paying rent. We publicise this in our newsletters and would urge anyone experiencing difficulties to contact them. They can help with budgeting and benefits advice and looking at options such as moving to a property with a lower rent. We also have a programme in place to improve energy efficiency across the housing stock to cut energy use and so save on fuel consumption.

### **Rents across the housing stock**

The Scottish Federation of Housing Associations' (SFHA) have developed an Affordability Toolkit that lets us use our rent data and data at a local authority area level on household income to consider if our rents are “affordable”. It is based on an assumption of income by household type just above what would typically qualify for housing benefit. This is a “moderate income” approach

We can't provide all the details of the calculations in this briefing but anyone attending the Rent Focus Group session can find out more about how it works. We do realise that these calculations are based on broad assumptions but these are an industry standard model.


We are aware that the Affordability Tool has limitation as it does not take into account under / over occupation. You can find out more in our Affordability Fact Sheet.

We know that everyone is different and if you have any problems paying your rent please get in touch with the Tenancy Management team who will try to help.

This year we have again produced a separate fact sheet on Affordability that can be found on our website. Broadly speaking the Association's rents would remain affordable even with the higher end



	<p>increase. However we do understand that desk top exercises do not fully reflect the reality of how affordable individual tenants find our rents.</p> <p>We are also looking at impact of increases and affordability at higher rent levels and discussion will be held on this at the Focus Group and Drop In Session.</p> <p>The majority of properties owned by Paragon were originally built by Scottish Special Housing Association (SSHA which became Scottish Homes) and were mainly purchased by Paragon in four transfers between 1998 and 2002. The rent structure in place reflects the location and amenity of properties and the cost of the acquisition of properties and planned investment.</p> <p>Additionally a number of properties were acquired by the Association via the Mortgage to Rent Scheme or Buy Back (BBOOM). Rents for these were set individually taking into account the level of investment required to bring properties up to the Scottish Housing Quality Standard and the cost of acquiring these.. Where we have provided new build properties these rents reflect the project cost and grant levels for it. In both cases affordability is considered but the rents reflect different acquisition routes.</p> <p>At the opposite end of the spectrum we have some properties that have rent levels that could be considered to be low as they are substantially lower than the Scottish Average.</p> <p>Given the above, rents for what appear to be very similar properties may vary but they reflect how we have acquired them and the programme of works involved.</p> <p>The numbers acquired by different routes are growing therefore longer term we are considering “a rent harmonisation process”. This would see us working over a number of years to harmonise rent across the stock. We will be consulting in the coming year and look out for opportunities to get involved. This was planned to start this year but we have had to delay this due to Covid 19.</p>
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<p><b>Will Paragon still be able to carry out improvements and repairs?</b></p>	<p>If we adopt any of the increases or no increase at all there may have to be some savings on projected expenditure and as noted above it would have a longer term impact too so we would have to look at reducing investment, services or delay some works.</p>
<p><b>How will Paragon fix rent increases in future?</b></p>	<p>There are no proposals at this time to move away from an RPI inflation based formula with an annual consultation on the increase to be set and we will start consultation on rent setting.</p> <p>The Association can continue to invest in your homes, meet the SHQS, EESSH and maintain a good level of service and meet our other obligations provided we take account of all the considerations when we set the increase.</p> <p>We will continue to inform and consult with you on rent matters and are happy to listen to your views on how we can make that work for you.</p>
<p><b>Will Paragon continue to be financially sound in the future?</b></p> 	<p>We are not complacent about what we do. We regularly review our financial position and look ahead. We subject to scrutiny and make regular returns to the Scottish Housing Regulator on performance and financial matters.</p> <p>We have produced a summary of our financial position in our Annual Report and we produce Annual Accounts. You can find this on our web site at our Facts and Figures section – here is the <a href="#">link</a></p> <p>We are of the view that we can successfully deliver services to you into the future, continue to provide homes at affordable rents without excessive rent increases and continue with our investment in your homes.</p>

## What about Value For Money?



Outcome 13 of the Scottish Housing Charter expects Social landlords to manage all aspects of their businesses so that:

*Tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay.*

The Scottish Housing Regulator's National Panel of Tenants and Service Users published its 4<sup>th</sup> Annual Report in March 2017. The report considered views on what value for money means for users of social landlord services. It included a range of factors that contribute to value for money judgements and to what extent service users see these factors as potentially justifying higher rents. Feedback suggests that value for money judgements are influenced by a broad range of factors.

The main drivers on value for money appear to be:

Rent levels and affordability

Comparability of rents

Quality of Services such as Repairs / Maintenance

Capital Investment in Homes

The Size of Annual Rent Increases

Feedback from the Panel did not express a clear preference for a single value for money performance indicator, but saw value in a range of measures around rent comparability, income remaining after tenants have paid housing costs and tenant satisfaction with rents.

We have been undertaking work around value for money including a void and repairs review with the Tenant Scrutiny Panel and working with Scotland's Housing Network on cost benchmarking. Our most recent feedback from tenants through our ongoing tenant satisfaction "reality checks" show that 74.7% of tenants feel their rents offer good value for money

## How can I make my views known?



This year we have extended the number of ways you can make your views known:

1. By returning our postal survey sent with your newsletter
2. By using an email version of the form – you may have received this direct to your in box – if we don't have your email address please provide us with this
3. By using our online web site survey form [Link](#)
4. Taking part in the sample Phone Survey if contacted
5. By joining the Scrutiny Group and/or taking part in the Rent Focus Group
6. By attending the virtual drop in session or requesting a callback - including evening session

You can find out more about how to get involved from our web site [Link](#) or Facebook page [Link](#).  
If you want to take part in any of our activities see the contact details below

If you have any other ideas on how you would like to make your views known - please let us know!

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