



The Voice of Scotland's Housing Associations

Keeping our homes safe and healthy





Introduction

Over a million people in Scotland live in a social home: but nationally, there is a waiting list of over 250,000 people.

Scotland's housing associations provide safe, warm, affordable homes for life, and we desperately need more of them. That's why housing needs to be a crucial part of the conversation ahead of the next Holyrood elections on 7 May 2026. SFHA is publishing a series of policy position papers to set out the challenges for our members, outline and test our key policy positions, provoke debate, and seek to influence party manifestos. This final paper in the series focuses on 'Keeping our homes safe and healthy'.

About SFHA

The Scottish Federation of Housing Associations (SFHA) is the voice of housing associations and co-operatives. Housing associations and co-operatives provide homes for over half a million people in Scotland. As not-for profit organisations, they don't just build, maintain and rent out homes; they also help their tenants by providing care and support services as well as advice and support on energy efficiency, finances, employment and more.

Summary

Housing association homes are some of the safest and healthiest in Scotland and ensuring they remain that way is a top priority for the sector.

However, the last few years have thrown up new challenges in terms of legacy construction issues, changing quality standards as well as rising costs which risks impacting on rent levels.

Increasing compliance requirements and uncertainty around future standards, along with a lack of funding certainty makes effective and efficient asset management more challenging.

Our members are working hard to balance these pressures with keeping rents affordable at a time when many tenants are struggling with the cost of living.

Our calls to action ahead of the 2026 election are:

Deliver fair funding to housing associations so tenants don't end up paying for construction industry oversights through higher rents.

Commit to working with the sector to ensure the implementation of new regulations are realistic, achievable and focused on delivering the best outcomes for tenants.

Take forward tenement law reforms, including compulsory owners' associations and building reserve funds, to tackle mixed tenure challenges.

Monitor and evaluate the impact of increasing standards and the growing compliance burden to make sure it is delivering the intended consequences.

Take a holistic approach, recognising the health, climate and cost of living benefits of upgrading homes, and develop policy and grant programmes that support realising these benefits.

Context

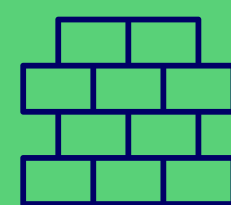
Ensuring our homes are safe and healthy is at the heart of everything our members do, and Scotland's housing associations have a strong track record of providing some of the safest and healthiest homes in the country.

However, over the last few years new challenges have emerged, and the regulatory framework is becoming more complex. Quality standards are rising and tackling legacy issues such as cladding and RAAC is complex and costly.

On top of this, skills shortages and inflation are driving up costs, and without financial support from the Scottish Government, these costs will be borne by tenants through higher rent levels.

Housing association homes have the lowest levels of disrepair, at 37% compared with 57% for local authorities, 59% for private rented sector and 41% for owner occupied homes.¹

Housing association homes also have the lowest number of homes failing the Scottish Housing Quality Standard (SHQS) of any tenure at 30%, compared with 43% of local authority homes, and 62% of private rented homes. 58% of mortgaged homes and 61% of homes owned outright failed the SHQS.²



Cladding and fire safety

Identifying and replacing potentially dangerous cladding has been a priority for the sector. In summer 2025 the Scottish Government acted on SFHA calls for a fair and clear pathway so housing associations could access government funding to support this work.

Housing associations are in the process of arranging and carrying out Single Building Assessments (SBA) to identify what work is needed. However, there is a high level of uncertainty about what financial support will be available to carry out works identified through these surveys.

The Scottish Government has committed to supporting the costs of replacing potentially dangerous cladding, but for some landlords, the SBA may identify further fire safety issues that need to be addressed. There is currently no commitment from government to support landlords with these costs, meaning the costs will fall to the tenants, impacting on rent affordability.

1. www.gov.scot/binaries/content/documents/govscot/publications/statistics/2025/01/scottish-house-condition-survey-2023-key-findings/documents/scottish-house-condition-survey-2023-key-findings/scottish-house-condition-survey-2023-key-findings/govscot%3Adocument/Scottish%2BHouse%2BCondition%2BSurvey%2B2023%2BKey%2BFindings.pdf
2. Scottish House Condition Survey: 2023 Key Findings, Scottish Government, January 2025



Damp and mould

Following the tragic death of Awaab Ishak in 2020 due to exposure to damp while living in a property provided by an English housing association, the UK Government introduced Awaab's Law in England - setting clear timescales for responding to hazards within the home (including damp and mould).

The Scottish Government has committed to introduce Awaab's Law in Scotland. In developing and implementing the regulations for Scotland, the approach must focus on delivering the right outcomes for tenants - that is safe, healthy homes.

Our members are clear that lessons can and must be learned and housing associations want to work with the Scottish Government to make sure that damp and mould is managed as well as it can be. That means tackling the root causes of damp and mould, whether they are structural defects, disrepair or poverty. Fundamentally, the core issue is often that people cannot afford to heat their homes. This in itself is not right.

Diagnosing the root cause can be complex and time consuming, and members are concerned that focusing too much on response times could be counterproductive as they are already largely surpassed in Scotland.

The way social housing is regulated differs in Scotland from England, and while there are no timescales set out in law, housing associations in Scotland have policies with clear standards and timescales for dealing with damp and mould. Many landlords already triage cases through their current repairs reporting process, with damp and mould being prioritised.



Mixed tenure buildings

Flats account for 72% of housing association stock - higher than any other tenure.

Many of these are within mixed tenure buildings - with some owner-occupied homes and some privately rented. Maintaining and upgrading homes in mixed tenure buildings can be costly and challenging. Agreeing works with other owners can be difficult, often resulting in delays to work - directly impacting on the quality life of housing association tenants.

SFHA, and others, have been calling for changes to tenement law to make it easier for owners of flats to make decisions and take forward improvements. The Scottish Law Commission has been working on proposals for compulsory owners' associations, and we urge the Scottish Government to work with stakeholders to take forward their proposals, along with action on the other recommendation of the Scottish Parliament's Tenement Maintenance Working Group - building reserve funds and regular building inspections.

Future Challenges

Changing requirements and expectations

The last decade has seen a significant increase in compliance requirements for both new build and existing homes. More changes are on the horizon including the introduction of Awaab's Law and the Social Housing Net Zero Standard. These changes have an impact on staffing requirements as well as capital investment, meaning higher costs.

Uncertainty about future investment requirements

The most efficient approach to asset management is to take a long term, planned approach, where possible grouping works together to reduce costs and reduce disruption to tenants. Uncertainty around future standards, including delays in finalising the Social Housing Net Zero Standard means housing associations are not able to operate as efficiently as they could - this will result in costs that are higher than they need to be.

Lack of funding certainty

For those landlords carrying out SBAs, there is uncertainty about what work will be needed and what support will be available from the Scottish Government. This uncertainty can impact on landlords' confidence, resulting in scaled back new build and improvement programmes. This will have a direct impact on other policy priorities including increasing the number of affordable homes and achieving net zero.



Member Concerns

Rent affordability is paramount

This must be at the heart of housing policy making. Providing services and maintaining housing association homes is paid for by tenants through their rents. Increasing maintenance costs puts greater pressure on rent levels - when many tenants are already struggling with the cost of living, keeping rents affordable must be a top priority.

Implementation timescales must be realistic

While there is support across the sector for improving standards and services, implementing changes must be done in a way that is affordable and achievable.

Costs are rising

Across the board, the cost of delivering services is increasing. From higher tender prices to rising insurance premiums, housing association budgets are under increasing pressure.

Geography impacts on costs and services

Complexities of geography and location impact on the cost of compliance - weather and climate related factors, as well as supply chain challenges in remote, rural and island communities are driving up costs.

Pre-1919 tenements are a challenge

In some areas, there is significant disrepair of older sandstone tenements, with limited grant support available from financially stretched local authorities. The challenge of organising communal works in mixed tenure buildings is resulting in housing associations being unable to upgrade some homes.

We need to tackle the root cause of damp and mould

Some of our members have estimated that only around 20% of cases are damp are a result of water ingress and these cases are relatively straight forward to resolve. However, many cases are a direct result of people being unable to afford to heat their home because of fuel poverty or due to overcrowding. Without resolving these inequalities and chronic housing supply challenges, the problem will not be solved.

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CASE STUDY

Home Group's fire safety improvement works

Following the Grenfell tragedy, Home Group Scotland moved swiftly to ensure its customers were safe.

They commissioned a PAS9980 assessment of fire safety in the external wall systems of all of its buildings above 18 metre high in Scotland. This was in addition to the annual fire risk assessments that Home Group had been carrying out for many years.

There was no legal requirement to carry out this assessment, but Home Group Scotland chose to do this as part of its commitment to applying the higher of the English and Scottish safety standards, wherever reasonable and practical to do so. The PAS9980 assessment identified the presence of flammable cladding on the top floor of a building and other issues with cavity barriers, compartmentalisation and fire doors were also identified.

Following the assessment, a range of measures were installed to mitigate the risk posed by these issues. This included improved fire detection, replacement of materials in the soil vents and service ducts, remediation and replacement of fire doors.

The work was fully funded by Home Group.

As a result of this investment, risk has been reduced to a tolerable level and Home Group has now successfully applied for Scottish Government funding to complete a Single Building Assessment - this will inform further, permanent remediation.

Key lessons learned:

Proactive engagement with tenants is essential to ensure they understand the importance of the work and provide access

Make sure you have a fully documented report on all work completed

Bring in expertise to ensure you correctly specify works, if required.



Calls to action

We need a policy and regulatory framework that enables social landlords to respond to these challenges in a way that works for tenants and other customers – ensuring our members continue to provide homes that are safe and healthy, alongside building new homes to help tackle the housing emergency.

In developing policy, the Scottish Government should consider how investment in building safety also addresses wider issues of health and wellbeing, the high cost of living (particularly heating costs) and carbon emissions.

The issue of fairness must be at the heart of Scottish Government policy. While housing associations will always work to ensure their homes comply with and exceed building safety standards, consideration must be given to who should be carrying the cost of industry failures.

We call on the next Scottish Government to:

Deliver fair funding so tenants don't end up paying for construction industry oversights through higher rents.

Commit to working with the sector to ensure the implementation of new regulations are realistic, achievable and focused on delivering the best outcomes for tenants.

Take forward tenement law reforms, including compulsory owners' associations and building reserve funds, to tackle mixed tenure challenges.

Monitor and evaluate the impact of increasing standards and the growing compliance burden to make sure it is delivering the intended consequences.

Take a holistic approach, recognising the health, climate and cost of living benefits of upgrading homes, and develop policy and grant programmes that support realising these benefits.



Get in touch to
find out more
sfha.co.uk



Susie Fitton, Policy Lead | sfitton@sfha.co.uk