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## The affordability of “affordable” housing in England: conditionality and exclusion in a context of welfare reform

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### ABSTRACT

Contemporary debates around affordability have largely focused on homeownership and private renting. This article considers the affordable social rented sector in England, in which reforms to social welfare assistance, reduced security of tenure, and a shift towards mid-market rents, are changing access to ‘affordable’ housing for those on the lowest incomes. Drawing on in-depth interviews with housing associations and stakeholders, the article highlights the increasing use of affordability assessments for prospective tenants. These assessments interact with mid-market rental products to increase the potential for exclusion from affordable housing on the grounds of ability to pay. This conditionality is applied not only at the point of tenancy access, but also at renewal of fixed-term tenancies. The research highlights that the combination of welfare and housing policies, in the context of a financialising housing association sector, has the potential to erode access to social housing for those who are perceived as a financial risk, reshaping the focus of social housing.

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Affordability; conditionality; welfare reform

## Introduction

With adequate housing increasingly out of reach for a large proportion of the population in most countries, housing affordability is an area of global interest (Tsenkova & French, 2011). Whilst the characteristics of housing systems vary markedly between and within countries, ‘affordability of housing remains the fastest-growing and most pervasive housing challenge in Europe and North America’ (Tsenkova & French, 2011, p. 27). Research has particularly focused on the unaffordability of homeownership for different groups (Aramburu, 2015; Bruce & Kelly, 2013), the rising proportion of households living long-term in the private rented sector (Clapham *et al.*, 2014; Coulter,

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2017), and associated affordability pressures (Bone & O'Reilly, 2010; Dewilde, 2018). Social housing has featured less prominently in affordability debates, perhaps because this housing is oriented towards those who are excluded from other markets, often through inability to pay. However, the interaction of a number of policies in England has the potential to erode access to social housing for those on the lowest incomes. Reforms to social assistance provision (welfare reforms), reduced security of tenure, and diversification of new supply towards mid-market rents is resulting in scrutiny of tenants' financial risks, and greater conditionality in access to social housing.

This article draws on research conducted with the housing association sector in England, using in-depth interviews with 17 employees in ten housing associations, and 11 stakeholders. The research explores the organizational impact of post-2010 welfare reforms, finding that prospective tenants increasingly face affordability assessments, which determine whether they are likely to be able to meet rental costs. Given that many housing associations now offer some housing at Affordable Rents of up to 80% of local market rents, affordability is impacted both by the potential for reduced entitlement to welfare benefits and by the increasing supply of 'affordable' housing that is more expensive than social housing. This article explores the questions: how do welfare reforms impact on housing association practices, in relation to tenancy access and renewal? How does the Affordable Rent programme inform practice in these areas?

This article contributes to the growing literatures on housing affordability (Tsenkova & French, 2011), welfare conditionality (Flint, 2019) and organizational change in social housing (Manzi & Morrison, 2017). First, the research extends contemporary affordability debates beyond homeownership and private renting, to social housing. This article considers affordability concerns as a driver of organizational practice, adding to research that more typically focuses on household financial impacts and approaches to budgeting (Hickman *et al.*, 2017; Moffatt *et al.*, 2016). Second, the research explores the interaction of welfare and housing reforms, arguing that the *combined impact* of welfare reform, limited security of tenure, and the diversification of social housing, has greater significance than each measure alone. Finally, the research provides empirical evidence for increasing conditionality in access to, and renewal of, social housing tenancies, building on Nethercote's (2017, p. 29) warning of the exclusionary effects of conditionality. With new evidence suggesting that pre-tenancy assessments in social housing are widespread, and with affordability a crucial criteria (Greaves, 2019), the research presented here provides in-depth insights into the drivers, use, and implications of these emerging practices. The Homelessness Monitor in England has noted widespread anxieties among local authorities about changes to housing association allocations, and the impact of affordability or financial capability checks (Fitzpatrick *et al.*, 2019); this article adds housing association perspectives to the debate.

The policies discussed here are specific to England, but the broader issues have international relevance. Though housing 'is a universal necessity of life' (Madden & Marcuse, 2016, p. 12), the retreat from State provision within Europe and beyond has failed to provide housing that is affordable to all (Pittini *et al.*, 2017). At the same time, housing affordability has become one of a range of social problems to be individualized, leaving individuals bearing responsibility for finding pathways out of

'housing risk' in a context of narrowing options (Stonehouse *et al.*, 2015, p. 407). The rise of welfare conditionality in a number of international contexts places new conditions on eligibility, receipt and/or retention of welfare goods, particularly in the UK and Australia (Taylor *et al.*, 2016, Watts and Fitzpatrick, 2018b). In housing, this can mean applying behavioural conditions at the point of attempting to access a tenancy, or at renewal. Access to secure and affordable housing is therefore being made more difficult by the very forces of precarity and austerity (Shildrick *et al.*, 2012) that reinforce the value of stability of residence in the first place (Preece, 2018).

The article first outlines the English housing association context, before discussing affordability, conditionality and welfare reform. It then considers interactions with housing association diversification and financialisation. The key findings from the research are that: the use of affordability assessments has expanded as a result of welfare reforms; the interaction of affordability assessments and the Affordable Rent regime widens the impact of these assessments and forms of exclusion from social housing; and the use of fixed-term tenancies makes conditionality a process, with affordability considerations reapplied at key points.

## The housing association sector in England

The social rented sector in the UK is one of the oldest in Europe (Ravetz, 2001) and at its height in the 1970s housed a third of households (Stephens, 2019). At this time, tenants had varying backgrounds and income levels (Forest & Murie, 1988), but by the early 1990s the policies of successive Conservative governments resulted in significantly less social housing units being built, and the sale of 2.5 million UK social housing homes under the Right-to-Buy scheme 1980–2013 (Adam *et al.*, 2015). This transformed social housing into 'a "residual" sector performing a "safety net" function' (Stephens, 2019, p. 46). The broad purpose of the social rented sector in the UK is to provide sub-market rental housing and low-cost home-ownership to households whose needs are not met by the market (Stephens, 2019). This article focuses specifically on the English housing association context because it is here that social housing provision is being reimaged to a much greater extent than in the devolved territories of Scotland, Wales and Northern Ireland. Stephens (2019, p. 56) argues that this divergence is partly driven by 'English radicalism', which has shifted social housing towards an 'ambulance service' model of temporary assistance, rather than a more secure 'safety net'. This means that there is increasingly 'no such thing as a UK experience in the housing field' (McKee *et al.*, 2017, p. 60).

There are two main types of social housing provider: local authorities, which own 6.7% of housing stock in England (1.59 million units), and housing associations, which own 10.5% (2.59 million units) (Ministry of Housing Communities and Local Government, 2019a). The housing association sector is diverse between and within the territories of the UK, with differences in composition, stock type, governance arrangements, geographical focus, and operating models (Manzi & Richardson, 2017). This research focuses on housing associations partly because they have greater freedom to rethink their role when compared to local authorities, which are more bound by statutory duties. Indeed, there is evidence to suggest that a 'reimagining' process is

**Table 1.** Summary of legislative reforms.

Size criteria or 'bedroom tax'	Reduced the benefit entitlement of social housing tenants who were deemed to be under-occupying, with a 14% reduction in housing benefit for claimants with one extra bedroom, and 25% for two extra bedrooms (Wilson, 2017).
Benefit cap	Set a limit on the total amount of welfare benefits that a household could receive, varied by location and household type.
Universal credit	Replaces six existing means-tested benefits and tax credits for people of working age with one payment (OBR, 2018). It includes Housing Benefit, which subsidises recipients' housing costs; this is currently paid every 2 weeks, but will be paid monthly under UC. One of the key features of UC is that the housing element will be paid to the tenant, rather than the landlord, as has often been the case.
Rent reduction	Social housing rents were reduced by 1% a year for 4 years.

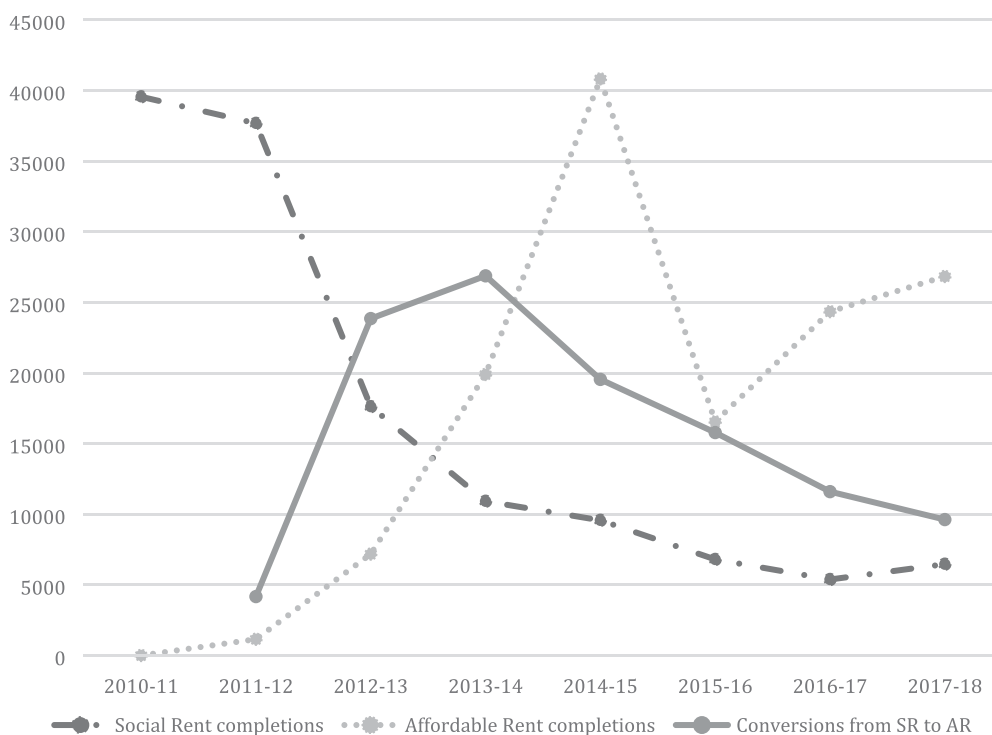
underway in England, partly driven by welfare reforms (Hickman *et al.*, 2018; Manzi & Richardson, 2017).

The research considers welfare reforms that have particular relevance for housing associations because they impact on Housing Benefit, which forms a majority component of rental income streams (Mullins & Jones, 2015). Table 1 summarizes these changes, which – alongside other measures – were presented by government as a response to perceptions of growing dependency and the increasing cost of welfare provision (Ferrari, 2015). Welfare reforms sought to, variously, reduce public spending on welfare, incentivize employment, and introduce 'fairness' between those in receipt of out-of-work benefits and those in employment (Mackley *et al.*, 2018). The 'bedroom tax' aimed to reduced under-occupation in social housing, and to bring accommodation-size entitlement in line with limits applied to Housing Benefit in the private sector (Wilson, 2017).

The Rent Reduction was implemented as part of the Welfare Reform and Work Act 2016 and is significant because, whilst it may have made rents more affordable for individuals, the cumulative impact on housing associations was the loss of millions of pounds of anticipated rental income. As such, it had potential to impact on institutional approaches to the management of financial risk.

Understanding the financial 'riskiness' of tenants was not a one-off event, but through the introduction of renewable fixed-term tenancies became a process relevant over the course of a tenancy. The Localism Act 2011 enabled housing associations to offer tenancies at fixed terms of between 2 and 10 years, eroding historic security of tenure (Fitzpatrick & Watts, 2017); in 2016/17, 23% of housing association general needs lettings at social rents were for fixed-terms (Ministry of Housing Communities and Local Government, 2018), although there is recent evidence that associations are reviewing their use (Brown, 2018).

The implementation of reforms to security of tenure and social assistance enhance the 'ambulance service' function of the sector (Stephens, 2019). This is largely in-line with the residualized nature of the Australian social housing system (Parsell *et al.*, 2019; Pawson & Hulse, 2011). Even in countries like the Netherlands, in which access



**Figure 1.** Completions of social rent and Affordable rent units, 2010-2018 (Department for Communities and Local Government, 2018), and conversions from social rent to Affordable Rent 2011-2018 (Homes & Communities Agency, 2018, p. 18).

to social housing has historically been for a broad spectrum of groups, the sector has increasingly been reconstituted as a safety-net for those unable to afford market housing, whilst other reforms propose increasing rents for middle-income tenants in price controlled units (Kadi & Ronald, 2014). Accessibility to low-cost housing has emerged as a key problem in Amsterdam, for example, where a combination of reforms ‘have clearly curtailed the poor’s right to the city’ (Kadi & Ronald, 2014, p. 283). However, diversification of supply into mid-market rental products can also be seen as reimagining the housing association role, to meet the needs of a broader set of ‘excluded’ households.

There are two kinds of rents in the English social housing sector: social rents, linked to local incomes and set by central government, and mid-market Affordable Rents, set at up to 80% of local market rates. Figure 1 shows the declining new supply of housing for social rent, and the growth in completions of Affordable Rent dwellings. Figure 1 also highlights the scale of conversions among registered providers – properties that are converted on re-letting to Affordable Rent, largely from other forms of social rent. From 2012 to 2018, 111,570 units were converted to Affordable Rent from social stock (Homes and Communities Agency, 2018). Conversions are seen as displacing genuinely affordable homes (Shelter, 2019).

In England, Affordable Rent makes up 25% of all registered providers' general needs lettings, and in 2016/17, 83% of Affordable Rent lettings were made by housing associations (Ministry of Housing Communities and Local Government, 2018). Affordable Rents for typical two-bedroom properties in England work-out at around 30% more expensive than social rents, but the difference is larger in the South (Joseph Rowntree Foundation, 2018). For example, in 2014-15, new tenants with Affordable Rents in London typically paid 60% more than those paying social rents (National Audit Office, 2018, p. 22). Some have argued that such rent levels are out of reach for most people who are eligible for social housing (Shelter, 2019). Social housing rents have also been increasing faster than earnings (National Audit Office, 2018), and housing association rents are higher than local authority rents, at £95.91 per week on average compared to £86.71 (Ministry of Housing Communities and Local Government, 2019b); this provides further potential for affordability stress.

### **Affordability, conditionality, and welfare reform**

The affordability of housing is a pressing international concern (Preece *et al.*, 2019), and 'one of the most prominent domestic public policy issues' in England (Joyce *et al.*, 2017, p. 5). However, as Bramley (2012, p. 134) argues, affordability is invoked in a wide variety of contexts, with different meanings and connotations. It is therefore an ambiguous term, measured and understood in different ways, with no definitive conclusion on the relationship between housing costs and income (Meen, 2018; Wilson & Barton, 2018). Ratio measures of housing expenditure relative to incomes (Wilson & Barton, 2018), residual income measures (Marshall, 2019), and perceptual measures (Green *et al.*, 2016), have all been criticized (Meen, 2018).

Although – by a range of measures – private renters experience the worst affordability, social renters also experience significant affordability problems (Bramley, 2012). The proportion of low-income social renters in England whose Housing Benefit did not cover all of their rent increased sharply from 2010 to 2015, reflecting the implementation of welfare reforms which meant that, 'for the first time, some working-age social renters with no other sources of income or assets might not be entitled to enough Housing Benefit to cover all of their rent' (Joyce *et al.*, 2017, p. 28). This article argues that affordability is therefore an increasingly important concept for the 'affordable' housing sector. Indeed, a recent survey of 106 social housing organizations (half of which were housing associations) reported that 82% of respondents used pre-tenancy assessments, with almost half of those stating that the most important element was an individual's ability to afford a tenancy (Greaves, 2019). However, there is little in-depth understanding of the drivers, motivations and use of such assessments as a form of conditionality in housing.

Applying conditions to the receipt of social welfare has been a long-standing feature of the system (Watts *et al.*, 2014), traceable as far back as the Poor Laws (Bevan & Cowan, 2016). The current system of conditionality in the UK is therefore 'the latest chapter in the ebb and flow of more and less 'activating', 'responsibilizing' and 'disciplinary' manifestations of welfare states' (Watts and Fitzpatrick, 2018b, p. 4), albeit reflecting a trend towards increasing behavioural conditionality (Dwyer &

Wright, 2014; Reeve, 2017). Watts and Fitzpatrick (2018b, p. 18) distinguish between three types of condition in the targeting of welfare goods and services: status, related to being in an eligible community; need, related to the reason for assistance; and conduct, related to behavioural conditions. In Australia, Taylor *et al.* (2016, p. 4) contrast pre-existing 'basic' forms of reactive conditionality and 'new' conditionality in which conditions are deliberately used in an interventionist way to enact changes to behaviour. This can include coercive elements, with individuals facing the threat of particular consequences for non-engagement (Flint, 2011).

Recipients of welfare are therefore required to behave in certain ways to access welfare goods (Fletcher & Flint, 2018). However, there is less evidence about the impact of conditionality in the social housing sphere when compared to other arenas (Watts *et al.*, 2014). Watts and Fitzpatrick (2018b) note that welfare services can be allocated on the basis of entitlement or discretion. When considering this in relation to housing services, Dwyer *et al.* (2015) argue that the inclusive rights-based rhetoric around homelessness legislation and strategies is often at odds with discretionary implementation. The different actors involved in mediating access to social housing also creates complexity. Although individuals may be entitled to housing assistance via a local authority, provision of housing is often by housing associations, who may consider affordability and tenancy readiness when assessing prospective tenants. As welfare reforms create gaps between housing costs and welfare assistance to meet those costs (through Housing Benefit), this can create barriers to housing access. Discretionary Housing Payments can provide support to fill these gaps (Watts and Fitzpatrick, 2018b), but recent evidence suggests that provision is becoming more conditional on requirements such as seeking increased employment or searching for a more affordable property (Hickman *et al.*, 2018).

Whilst welfare conditionality has a long history, post-2010 reforms in England represented a significant evolution in the welfare system (Jacobs & Manzi, 2014). Given the importance of Housing Benefit to housing association incomes (Mullins & Jones, 2015), increased scrutiny of tenants' ability to meet their rent payments is not surprising. Consequently, conditionality may be operationalized through social housing allocations and tenancy agreements (Fitzpatrick *et al.*, 2014). However, because of tenure reform, conditionality may not just be applied pre-tenancy, but also at tenancy renewal. Indeed, the threat of non-renewal can itself be viewed as a powerful potential sanction. Watts & Fitzpatrick's (2018a) survey of housing associations and local authorities highlighted the disjuncture between motivations for initially adopting fixed-term tenancies (such as stock efficiency), and their use in practice as a tool to reinforce obligations such as paying rent. Even if prospective tenants negotiate pre-tenancy affordability assessments, they face increased monitoring, and the re-application of conditionality at renewal (Flint, 2019; Nethercote, 2017). Given the dynamic experience of affordability problems (Meen, 2018), and potential for waning resilience to austerity policies (Moffatt *et al.*, 2016), a wide set of tenants could be affected.

### **Housing association diversification and financialisation**

Access to affordable housing is not only impacted by reducing entitlement to welfare support, and increasing conditionality, but also interacts with the diversification of



housing supply into mid-market rental products. A mixed funding regime combining public grant and private finance is a key characteristic of the housing association sector (Tang, 2008). But housing associations are experiencing greater marketization (characterized by agendas such as competition and entrepreneurialism) and financialisation (the servicing and exchange of financial instruments), retreating from the provision of new social rented housing and increasing provision of market-rent and low-cost homeownership products (Manzi & Morrison, 2017). The establishment of the mid-market Affordable Rent programme, combined with restrictions to welfare support, has created a ‘paradigm shift for the sector’ (Manzi & Morrison, 2017, p. 7). In expensive markets, the combination of Affordable Rent products and welfare reforms could price some people out of the sector (Mulliner & Maliene, 2013). For example, in ten London boroughs, the difference between Affordable Rents and social rents for a typical two-bed property is over £5,000 per year (Joseph Rowntree Foundation, 2018), and could push households over the threshold of the overall cap on benefits.

Non-profit providers have increasingly used cross-subsidisation to make limited public funding go further (Mullins *et al.*, 2017, p. 14), including turning to global finance (Wainwright & Manville, 2017). Processes of housing financialisation – the transformation of tangible assets into liquid, globally tradeable financial commodities (Dewilde, 2018) – help to explain how access to housing may be becoming more conditional. Interlocking processes of deregulation, financialisation and globalization have promoted the role of housing as a commodity to a greater extent than ever before, leading to new forms of risk, unaffordability and instability (Madden & Marcuse, 2016, p. 39). Whilst the provision of below-market rent housing for people in ‘need’ on a non-profit basis remains a defining feature of housing associations (Crook & Kemp, 2019), Blessing (2016) notes that with prospective tenant groups built into the balance sheets of commercially-financed projects, those perceived as at lower risk of arrears are likely to be favoured. The view of households as a ‘site of risk absorption’ for financial markets can be applied not just to homeowners (Bryan & Rafferty, 2014, p. 409), but also to tenants, through increased scrutiny of household financial performance and literacy, regulation of conduct, and conditionality in accessing housing. As Fields & Uffer (2016) argue, this transformation of housing systems raises questions about the distribution of risk versus benefit between financial actors and the local urban sites they target for investment. In the research discussed here, pre-tenancy affordability assessments consider the level of financial risk posed by an individual. Some include risk indicators based on credit scoring, which are used in a range of contexts to stratify populations (Kear, 2017). Whilst there are benefits to such technologies and predictive analytics, there are also risks (Unwin, 2018), such as discrimination and exclusion (European Union Agency for Fundamental Rights, 2018).

The main aims of this article are to: consider the form and drivers of pre-tenancy affordability assessments in the housing association sector in England; explore interactions with the move towards mid-market rental products; and to situate this within a framework of conditionality to understand exclusion for those at the margins of housing affordability, including prospective tenants and those on fixed-term tenancies who face re-assessments in order to remain in a property.

## Research approach

This article draws on a wider project exploring the impact of welfare and tenancy reforms on housing associations in England (Hickman *et al.*, 2018). The geographical focus was partly pragmatic, but also reflects the unique combination of reforms to social welfare provision in a context of growing affordability pressures, which are reshaping housing associations to a much greater extent than elsewhere. The first phase of research reviewed existing evidence into the impact of welfare and tenancy reforms on housing associations, focusing particularly on: the Benefit Cap, Size Criteria (or Bedroom Tax), Universal Credit, and Rent Reduction. The themes and gaps from the review structured the topic guide for the empirical research.

The second phase comprised in-depth interviews with 17 people working at ten housing associations, and 11 individuals from stakeholder organizations. Stakeholders included national and local policy-makers, financial lenders, membership bodies, and third-sector organizations (for detailed descriptions, see Appendix, Table A1). The aim was not to generate a representative sample (which would not be possible in such a large sector), but to seek a diverse range of organizational types in relation to:

- Size (small: fewer than 5,000 U; medium: 5,000–30,000 U; large: 30,000+ U)
- Geographical concentration/dispersal of stock
- National, regional and local organizations, reflecting different housing market contexts
- Rural and specialist providers

Participants and organizations have been anonymized to protect confidentiality, and enable people to speak openly about commercially sensitive topics. Respondents are referred to by a code, beginning ‘HA’ for housing associations and ‘S’ for stakeholders. Recruitment reflected a desire to understand a range of experiences and the differential impacts welfare reforms may have across geographies and stock-types (Beatty & Fothergill, 2014). In-depth interviews were conducted largely by phone, between February and April 2018. A topic guide structured the interviews, with questions grouped around areas such as: the overall impact of welfare reforms, impacts of specific reforms, housing association mission and values, allocations and lettings, and behavioural expectations.

Interviews were transcribed and summaries were shared within the research team to develop a coding scheme, which was then refined through initial coding processes. Codes were grouped under broad headings. To build on their own in-depth knowledge, each interviewer coded their own interviews. This article draws on data around: affordability assessments, fixed-term tenancies, rent setting and affordability, behavioural scrutiny, and diversification. Whilst there was substantial discussion of the impact of welfare reforms on housing association incomes, that is not the focus for this article.

The research must be considered in light of a number of limitations. It did not explore individuals’ experiences, therefore the findings cannot demonstrate how prospective tenants have been impacted by affordability assessments. Although housing associations were selected to fit different typologies, each organization is not

representative of that ‘type’, and further cases would be needed to make more conclusive distinctions between provider groupings. In addition, whilst this article considers the interactions between welfare reforms and access to social housing, and interviewees linked practices to welfare reforms, they also acknowledged longer-running trends towards conditionality and sector diversification, as well as events such as the Grenfell Tower fire, and uncertainties around Brexit. Finally, a triangulated approach, including in-depth interviews, observations, and a wider picture of sector activities would add to the evidence-base in the future. The research presented here explores a sensitive area for housing providers, and was designed to elicit an in-depth understanding of the nuances of housing association perceptions and stated practices. For this reason, a number of interviews were carried out with multiple interviewees, including strategic and operational staff, which enabled complexities between stated objectives and practices to be explored. Stakeholder perspectives were also used to provide critical reflections on sector practices. The approach taken builds on emerging quantitative evidence (Greaves, 2019), providing in-depth insights into the use and drivers of pre-tenancy assessment and tenancy renewal practices.

## Findings

### *The use of affordability assessments in a context of welfare reform*

Pre-tenancy checks have been a long-standing part of the process for obtaining a housing association tenancy, with one organization noting that affordability checks were not ‘driven specifically by welfare reform’ (HA5R2). However, most participants linked the use of more comprehensive affordability assessments to welfare reforms (including Universal Credit), which were viewed as impacting prospective tenants’ ability to pay their rent and disrupting payment of Housing Benefit directly to landlords. Associations were now ‘more careful on screening of tenants’ (HA6R1), used ‘more rigorous affordability checks’ (HA2R1), and placed ‘more emphasis on it [affordability] than there has been in the past’ (HA1R1). This is driven by changes to welfare support, which have undermined the role of Housing Benefit in maintaining the affordability of housing for those on low-incomes (Joyce *et al.*, 2017, p. 39). The context was presented as ‘very different ... You’ve got to have that conversation about, how are you actually going to pay the rent ... it’s a deeper conversation’ (HA1R1). As one participant described, ‘3 or 4 years ago ... it was just a rough outline, we go into a lot of detail now, incomings and outgoings, proof of any earnings, benefits, general household costs ... we look at their debt’ (HA7R1). This was also projected into the future, to consider how entitlement to benefits may change; ‘we have to make sure that they can afford the rent not just now but in the future as well’, including ‘what kind of solutions they’re thinking they’re going to be able to put forward’ (HA7R1). As Bramley (2012) notes, however, the measures people take to get out of housing affordability difficulties may themselves be problematic, for example increasing personal debt.

This demonstrates the way in which problems of affordability are individualized, without regard to the structural barriers people face towards, for example, increasing employment (Dwyer & Wright, 2014). Some stakeholders noted the importance of

this wider context, with affordability issues arising from welfare reforms also compounded by changing labour markets, particularly the growth of the ‘gig economy, short-term, zero-hours contracts’, which means that for some of those trying to access a housing association tenancy ‘even social rent ... is not affordable’ (S1R1). The limits to their own influence was also recognized, since ‘there’s only so much that we can do ... is this a high rent problem or is it a low wage problem?’ (HA2R1).

Affordability assessments could draw on technologies, for example from credit rating agencies. A number of associations were ‘working with Experian ... running [tenants] through this tool, and that will generate whether they have any sort of financial risks ... based on data from their credit reports’ (HA4R3), with the aim of enabling early intervention. The emphasis was on support, for example to build ‘credit profiles ... we don’t intend to use it in a punitive way ... We wanted to support the people who were really going to struggle with it [Universal Credit]’ (HA8R1). A financial lender to the sector also highlighted modelling of tenant risk, which was ‘perceived as a big growth area for credit scoring agencies where they can risk rank the collection of payments from their customers and then can be very proactive at stopping arrears building up’ (S9R1). This was seen as essential with payment of the housing component of Universal Credit being made directly to the claimant. However, the implications of these technologies is unclear, as decisions rest on a seemingly opaque process, which individuals have limited ability to challenge. Whilst the ‘off-label’ use of credit ratings in social housing has been noted in other contexts such as US public housing (Rona-Tas, 2017), there is little research into their use in England.

Associations expressed a range of motivations for the use of assessments, but most were unable to quantify impacts in terms of potential rejections. As one participant pointed out in relation to those affected by the ‘bedroom tax’, ‘I suppose we would try our best to put them into an appropriately-sized property. I must confess I don’t exactly know what happens if we decide that it’s not affordable for someone’ (HA2R2). Whilst interviewees presented affordability assessments as relatively unproblematic, the next section makes clear the wider ramifications arising from the interaction of such assessments with the Affordable Rent regime. This raises questions about whether ‘affordable’ housing is truly affordable for those on the lowest incomes, and if not, how universal needs for housing can be met (Madden & Marcuse, 2016).

### ***The interaction of affordability assessments and affordable rent***

Participants were reluctant to use the language of ‘rejection’ in relation to the use of affordability assessments, instead highlighting the importance of tenancy sustainability. However, the reality was more complex. First, one organization had intended to use assessments in order to reject potential tenants with affordability concerns, but the poor predictive ability of the assessments prevented this. Second, whilst other organizations argued that assessments were not used for rejection, in reality they were used to restrict access to more expensive Affordable Rent properties. Respondents believed that rejections were ‘not a general problem’ (HA6R1), but given the dominance of Affordable Rent in new supply and the conversion of some social

rented stock to Affordable Rent, there are longer-term implications as ‘affordable’ stock becomes more expensive. There were also differences between housing associations and stakeholders in relation to perceptions of the scale of rejection.

The value of affordability assessments in predicting who would struggle to pay rent was highlighted as an issue by one large association. Whilst they ‘planned at one stage at least to use this [affordability assessment] as grounds for refusing to grant a tenancy... which we hadn’t done before [welfare reforms], but the predictive value was so weak that it would be very difficult to turn someone away’ (HA3R1). Whilst the assessment was intended to act as a predictor of arrears, ‘it’s barely better than random in terms of predicting who’s going to get into trouble and who’s not’ (HA3R1). Other organizations also highlighted the limited use of assessments, arguing that ‘we think there’s quite a weak link between a credit check and someone having a good record of paying their rent’ (HA10R1). This may relate to the unpredictable nature of arrears, which Hickman et al. (2017) noted often arose from unexpected events. As one participant stated, ‘if you’ve got a tool that can tell me when someone’s going to lose their job, then that’s great, but you haven’t got it’ (HA9R2). Nevertheless, there has been a shift to considering individuals as a bundle of risk exposures (Bryan & Rafferty, 2014), and alongside advances in artificial intelligence and machine learning (European Union Agency for Fundamental Rights, 2018), there is potential for the development of more advanced analytics. In this respect, individuals’ abilities to challenge predictive assessments of their risk, and attempts to shape their conduct, will be important (Kear, 2017; Rona-Tas, 2017).

Whilst some respondents explicitly ruled out rejecting tenants on the basis of an affordability assessment, comparing their approach to that of other associations who ‘will quite brazenly say they’re not for us... too much of a risk... We pick them up, we put the services around them and try and make it succeed’ (HA9R1), the reality was more complex. One organization argued that rejection was ‘a clear line in the sand... we do not reject anybody based on... whether they’re able to afford the property or not’ (HA4R3). Affordability assessments were framed as a tool to highlight prospective tenants who were at risk of ‘not sustaining their tenancy’, ‘and therefore to target resources on those households’ (HA4R3). However, a colleague also noted that affordability assessments ‘might mean that... we would reject them from an Affordable [Rent] and offer a social’ (HA4R1). Exclusion was not seen as a significant issue because Affordable Rent tenancies were only offered for some newly built properties.

Others made similar distinctions around rejection:

It’s more around... sustaining tenancies, and we’re putting people into the right type of accommodation... It wasn’t around excluding people, it was around making sure that they could afford where they’re moving into. So, for example, we’ve done affordability assessments for people moving into Affordable Rent, and saying, actually, it’s tight... And they’ll be much happier to then accept, or to wait for something to come through on, social rent (HA5R2)

The diversification of ‘affordable’ housing products has therefore introduced additional complexity – and conditionality – into allocations. As one association noted, ‘with limited funding... everything we build now is on Affordable Rent, which is 80%

of market rent. That remains to be seen, the impact that's going to have' (HA7R2). There was acknowledgement that 'you do need to earn more to afford those homes, so it's not for the poorest among us, those Affordable Rent products' (HA5R1), as rents would be unaffordable for households affected by the Benefit Cap. The typical income of those moving into such properties was 'about £6,000 per annum higher' than for social rent (HA5R1). This was seen as a result of 'some self-selection' (HA5R1), as 'people will be prepared to pay a bit more for a new home than for an older home' (HA5R2). However, this fails to account for constrained choice; as most new homes are Affordable Rent properties, the only way to access a new property is to pay more. Affordability assessments were about:

... identifying those people who clearly couldn't afford it, or, as we were working to the welfare reform agenda, identifying people who would potentially be hit by an oncoming change, and forewarning them of the consequences, and then working with them to make the right decision, for that longer-term (HA5R2)

In the context of welfare reform, affordability assessments could therefore be used as a tool with which to re-orientate expectations about the type of 'affordable' housing that could be accessed, and highlight the importance of distinguishing between welfare support that is distributed on the basis of discretion, rather than entitlement (Watts and Fitzpatrick, 2018b). The issue was not necessarily Affordable Rents per se, but the mix of development; as one stakeholder noted, 'I don't necessarily think that's a problem if you've got sufficient supply... and reinvest profits into provision of more housing' (S5R1). However, 'most new rents are now at Affordable Rent levels as opposed to... social rent' (S1R1), which raises the prospect of increasing competition for a dwindling number of properties that are affordable to those on the lowest incomes, with tenancies accessed only through some re-lets of vacant stock, rather than through new supply. Therefore, even a substantial increase in new supply would not necessarily improve access to housing for those on the lowest incomes. As one stakeholder argued, 'there's lot of new build of affordable housing but not social housing... You've left the most vulnerable individuals in our society out of what you're creating, where do they go?' (S8R1).

Ultimately, within the English legal framework, local authorities are required to secure housing for eligible households. Recent evidence highlights the growing concern of local authorities over the use of affordability assessments, and the impact on their ability to fulfil statutory housing obligations (Fitzpatrick *et al.*, 2019). This was also noted by stakeholders, who highlighted:

... tensions in some places where you've got [housing association] providers... being more stringent about who they will let to and tightening up their criteria around affordability, 'cos then it puts more pressure on councils to either pay to house households in temporary accommodation or house them in their own stock (S2R1)

Therefore, 'local authorities can end up being the provider of last resort and that has at some points along the line caused tensions between councils and [housing associations]' (S5R1). Housing associations all highlighted their commitment to a social mission, with one arguing that 'we're here for the most vulnerable, the ones for whom the market can't cater', noting '...if we don't house them, who will?'

(HA3R1). Whilst there could be tension around allocations between housing associations and local authorities:

... there is pragmatism ... I think broadly speaking we're working together quite effectively to try and house everybody that we can house ... inevitably when there's more people than there is supply, you do get people who fall through the cracks and you do get some stand-offs between different types of tenure ... I don't blame housing associations, why would you rent a property to somebody who can't afford it? That's the bottom line. Where it bubbles out is temporary accommodation and we are seeing in the south-east a massive increase in the number of households in temporary accommodation (S5R1)

The interaction of welfare reforms, diversification of provision, and housing responsibilities was therefore complex. As the stakeholder acknowledged, housing associations could not be expected to meet the gap between rents and incomes in a context where 'in many parts of the country, Housing Benefit is not enough' (S5R1) and 'the idea that Housing Benefit would take the strain of higher rents has been completely eroded' (S2R1). Indeed, welfare reforms such as the Benefit Cap and the 'bedroom tax' have resulted in sharp increases in the proportion of social renters on low-incomes whose Housing Benefit did not cover all of their rent (Joyce *et al.*, 2017).

### ***Affordability, conditionality and fixed-term tenancies***

The use of affordability assessments is evidence of one way in which access to affordable housing has become more conditional. Whilst housing associations argued that 'it's never about refusal, it's always about the right product' (HA5R2), this could mean refusal for a particular type of housing. Gaining a tenancy was therefore conditional on individuals demonstrating their capacity to sustain the tenancy in the longer-term. In a context of on-going welfare reform, associations were trying to limit organizational risks. In conjunction with (partial) rejections, fixed-term tenancies were another tool with which to manage potential risks to income streams, transferring risks – and remedies – onto individuals.

One organization described the way in which their use of fixed-term tenancies had changed as a result of welfare reforms. Whilst they had previously been used by 'very few' parts of the housing association group, following the announcement that Housing Benefit caps were to be extended to the social housing sector 'we reduced our fixed-term tenancies to 2 years, and their use has increased significantly' (HA2R1):

The intention was the people who we were signing up to properties where we knew that potentially, if their benefit was capped to LHA [Local Housing Allowance] levels... unless they got into work, they would struggle to pay the rent... For that reason, we put them on short-term tenancies, or fixed-term tenancies, and very interestingly, when the LHA threat went away, we had a bit of a discussion saying 'should we immediately reverse that' and we didn't... we'll pick it up when we review our tenancy policy. So I think fixed-term tenancies have... become a bit more of a mainstream product (HA2R1)

The proposal to cap Housing Benefit in the social rented sector, so that it matched restrictions faced by claimants in the private rented sector (who can only claim up to

the 30<sup>th</sup> percentile of local rents) was abandoned. However, the consequences of the proposed measure remain, visible through reduced security of tenure for new tenants at this association.

More widely, welfare reforms have been significant in increasing scrutiny of the behaviour of tenants, and prospective tenants. Gaining a tenancy is conditional on being able to effectively perform the role of ‘tenant’, through addressing any concerns about affordability. As one participant highlighted, ‘as part of that pre-tenancy assessment ... moving someone from eight to 20 hours a week can be quite straightforward’, and this would nullify ‘all the welfare reform penalties ... Nobody wants anything different, other than to get a home that they can live in successfully, for as long as they possibly can’ (HA5R2). This reinforces the point that ‘disciplining tactics’ may include informal processes of persuasion, nudging service users towards certain choices (Dobson, 2011). Similarly, another association questioned:

What’s the point in allocating somebody a tenancy that they basically can’t afford? It’s just going to fail ... We start working with potential customers when they’re on the waiting list, just to try and get them into the kind of financial shape that will enable them to manage a tenancy ... 90% of people respond to that ... But there are a relatively small number of people who we say, ‘I’m sorry, but we can’t do this for you at this point in time’ (HA9R1)

In cases where a shortfall in rent was identified, for example through the ‘bedroom tax’ prospective tenants may be told: ‘this is what you need to be doing, because you need to change your situation, or you’ve got to recognize that you can’t afford this’ (HA1R1). This individualization of affordability focuses attention on behavioural conduct, requiring individuals to behave in particular ways to access welfare goods (Fletcher & Flint, 2018). It may also increase the role of discretion because it involves an assessment of whether an individual has met certain standards (Watts and Fitzpatrick, 2018b, p. 29), such as gaining an appropriate level of sustainable employment.

Such conditionality is not just a result of welfare reforms, but broader changes since the Localism Act in specifying ‘who might be eligible for housing, things like a requirement that you be looking for work ... the idea of “in accepting this tenancy this is also what you’re expected to do”’ (S2R1). Furthermore, the use of fixed-term tenancies builds on the extensive use of probationary terms for new tenants, which were largely adopted over concerns around anti-social behaviour. As one organization highlighted, ‘I think we want to go forward and therefore set out a clearer plan in probation, to set those expectations ... to engage with us ... and trying to make it more conditional’ (HA4R1). This suggests a ‘contractualist’ approach, with the emphasis on tenant fulfilment of specific responsibilities (Fitzpatrick & Watts, 2017).

However, given that fixed-term tenancies operate for a specified period and are then renewed (or not), the need to meet conditions exist in perpetuity, with the threat of non-renewal a powerful way in which to regulate individual conduct. The renewal of fixed-term tenancies, and the complexities introduced by welfare reforms, were current issues for a number of associations. In one large organization, the intention was ‘very much to ... renew that tenancy, unless there are significant issues around affordability’ (HA2R2), ‘or there are significant rent arrears’ (HA2R1).



However, the experiences of others highlighted the way in which policies had been overtaken by emerging realities.

All of a sudden it's 2017, so we need to renew these tenancies and we actually don't know what we're doing... I think we realised that we were naïve in terms of how easy or... complicated it is in terms of making decisions... to end people's tenancies... If they are in rent arrears, we basically say 'look, you need to get yourself into a payment plan, otherwise come the 6 months, we will be looking to terminate your tenancy'. In some respect, it's quite a good tool, because it means that you engage with those residents... we promote it as a good thing (HA4R3)

Another respondent at the same organization emphasized that 'the reality is... those things are difficult to deal with, so we might offer... a shorter term up to a year, [where] people are either in the wrong size, or with rent arrears or some concerns about tenancy breaches' (HA4R1). This highlights the ambiguity and dilemmas faced by practitioners in enacting institutional policies (Flint, 2019), as well as the role of discretion. It also points to different motivations underpinning the re-application of conditionality, and potential for more tolerant or flexible responses in light of the complex realities faced by practitioners (Dobson, 2011). However, this raises the prospect that some forms of arrears are seen as more deserving of discretionary treatment than others.

There was evidence of discretion around issues such as the Size Criteria, 'as long as people are showing that they're engaging, and that we're working together, to find a remedy... Often it's a good trigger. So, people want their tenancy converted, and they will actually then work with us' (HA5R2). Therefore, the threat of non-renewal is seen as a tool with which to responsabilize some tenants. However, others perceived that those on fixed-term tenancies face a fundamental inequality in the treatment of arrears, since 'they have to pay that debt back within that remaining period of that fixed-term tenancy, unlike our assured tenants who've got that for the lifetime of their tenancy' (HA4R3). This adds to the evidence of a divide in the experiences of a new generation of social housing tenants, compared to previous cohorts (Chevin, 2013).

## Discussion

This article has considered the ways in which welfare reforms and sector diversification impact on housing association practices in relation to tenancy access and renewal. Housing association diversification has already led some providers to argue that there will be less of a focus on low-income groups alone (Mullins *et al.*, 2017). The research presented here highlights the significance of welfare reforms such as the 'bedroom tax', Benefit Cap and Universal Credit in compounding this issue, and the importance of considering the interaction of these policies with changing stock and tenancy types. Affordability assessments have been increasingly used to understand individuals' abilities to sustain a given tenancy; they indicate the extension of conditionality in social housing and potential for the exclusion of those at the margins of housing affordability. Whilst the stated rationale and use of assessments is not uniform, they move towards conditionality on the basis of ability to pay, which may leave those able to pay more, with lower risk of arrears, being favoured as prospective

tenants – a strategy of ‘backing winners’, rather than pursuing a universal right to housing (Blessing, 2016, p. 166). It also signals the magnification of differences between those within a housing allocation system, and those who are attempting to gain access (Wetzstein, 2017, p. 3164), who face more stringent assessments, reduced security, and inequality in the treatment of arrears. As prospective tenants are a diffuse and largely invisible group, they may be more vulnerable to exclusionary practices.

Although rejections were not seen as a significant issue by most participants, affordability assessments are not necessarily a benign practice. The wider issues are the expansion of the grounds by which access to affordable housing may be restricted, and the intensification of conditionality in welfare systems. When affordability assessments are considered in conjunction with the shift in supply towards mid-market ‘affordable’ housing, the research suggests that there is empirical support for Blessing’s (2016, p. 168) prediction that new selectivity in provision may increasingly reward the economically established, whilst punishing the economically excluded. Conditionality is underpinned by particular understandings of the causes of poverty (Fletcher & Flint, 2018), reflecting an individualizing discourse that casts culture and dispositions as the cause of a range of ills (Reeve, 2017). Those at the precarious end of the labour market, experiencing insecure and poorly-paid employment (Shildrick *et al.*, 2012) may be doubly disadvantaged in being excluded from accessing a home that could provide a secure platform from which paid employment was more viable (Robinson, 2013).

However, Dobson (2011) cautions against the analysis of conditionality purely as an indicator of individualizing tactics, as there are a range of drivers for practitioner motivations. For example, in a context of a housing affordability crisis, practitioners may argue that stock diversification enables them to meet a wider range of housing needs, extending their social mission to broader populations who are failed by the market. As one participant noted, ‘we’re meeting all sorts of needs ... we’re going to attract a range of clients coming into the business’ (HA1R1). Crook & Kemp (2019) argue that the rise of ‘Generation Rent’ has given an opportunity for housing associations to provide rental housing to those on middle-incomes. A ‘welfarist’ model of social housing positions the sector as increasingly catering to the poorest and most vulnerable individuals on a short-term basis (Fitzpatrick & Watts, 2017); yet in contrast to this, housing associations are expanding their services to a wider range of groups affected by housing affordability pressures. This is rendered more problematic in the absence of a significant expansion of genuinely affordable housing at social rents, and the shift towards mid-market and private rental products.

The practices of the housing associations involved in the research demonstrate the way in which households ‘are being thought of, and calibrated, as a set of attributes, which includes their wage incomes ... along with their financial commitments associated with debts ... and finally, their assets’ (Bryan & Rafferty, 2014, p. 410). One way for organizations to manage those risks is through increased conditionality, whether enacted contractually through tenancy agreements (Froud, 2003), or on the basis of informal behavioural agreements, including with those seeking a tenancy. For example, those whose income is at risk as a result of welfare reforms may be required

to increase their working hours or to complete pre-tenancy training in budgeting, to allay concerns about money management under Universal Credit. Conditionality in housing does not solely operate through direct forms of exclusion, but as Watts *et al.* (2014) note includes support and encouragement for individuals to behave in particular ways. This forms part of a broader narrative of ‘fiscal responsibility’, through which prospective tenants must demonstrate a commitment to self-improvement and responsibility (Stonehouse *et al.*, 2015), leading to the production of socially acceptable behaviour (Fletcher & Flint, 2018). Moreover, it is evidence of the implications of financial and commercial logics in the governance of housing associations, in part driven by a regulatory regime that is focused on financial viability.

Therefore, it can be seen that housing commodification is not just financial, but is also ‘a technique of governance, a political process as much as an economic one’ (Madden & Marcuse, 2016, p. 94). Whilst the regulation of tenant conduct has been a long-term state project, particularly in relation to discourses of anti-social behaviour (Nethercote, 2017; Powell & Flint, 2009), the use of affordability assessments and tenancy reforms highlights the importance of other spheres of regulation. Part of performing the role of ‘tenant’ is demonstrating an ability to afford the rent due, but focusing on issues such as budgeting and money management individualizes tenancy sustainment and obscures the fundamental lived experience of many – the structural issue of lack of money (Moffatt *et al.*, 2016). As in other areas of welfare conditionality (Flint, 2011), there is a need to better understand how individuals experience and negotiate such assessments. Furthermore, it is not clear how the use of technologies within such assessments can be performative, with credit ratings not only being used to predict financial risk, but also perpetuating that risk by restricting access to social goods (such as affordable housing) that may help to mitigate financial crises (Rona-Tas, 2017, p. 55). Although technology has largely been considered in relation to digital service delivery and interface design (Yates *et al.*, 2015), a key area for future research is to understand the way in which technologies may generate new forms of exclusion, limiting access to welfare goods. Central here is the extent to which the calculations and logics of such assessments are transparent and open to challenge, by users and recipients.

Manzi (2015, p. 19) argues that the role of housing professionals in ‘limiting access, providing conditional support and policing housing estates is likely to be uncomfortable, disorienting and profoundly unrewarding’. Indeed, many of the practitioners involved in this research wrestled with dilemmas of practice at the intersection of sometimes conflicting and contradictory policy spheres (Flint, 2019; Manzi & Richardson, 2017). This was particularly the case when discussing the complexities and nuances of making decisions to grant, and end, tenancies. Housing associations are in many respects operating in a context not of their own making, and whilst there was a strong commitment among participants in this research to providing long-term homes for those who were excluded from other markets, this could conflict with other logics, particularly financial considerations. It remains to be seen whether proposed regulatory changes will see a rebalancing of the dominant focus on financial management, and a challenge to some of the issues discussed here. However, it is crucial to record the scale of rejections, including for different tenancy types, which

would make visible the experiences of prospective tenants, a group with less collective voice due to its dispersal and largely hidden nature.

## Conclusion

The research makes three main contributions to knowledge. It highlights the need to critically question the affordability of the ‘affordable’ housing sector, which is often taken for granted. It also demonstrates the fruitfulness of considering the interactions between a range of policy reforms, which when taken together have greater significance for people’s ability to access and remain in social housing. The combination of rising rents, restrictions to welfare support, and reduced security of tenure have a greater impact than each measure alone. Finally, the research builds on recent evidence of the growing use of pre-tenancy affordability assessments in the English social housing sector (Fitzpatrick *et al.*, 2019; Greaves, 2019), by providing in-depth accounts of the drivers and use of these forms of conditionality from the perspective of housing associations. The research shows that the ways in which such assessments are carried out, and the possible outcomes for households, are varied and imprecise. The different ways in which affordability is defined, measured, and understood is part of this, but it also reflects the fragmented nature of social housing provision, in which a myriad of organizations set their own processes with little consistency, standardization, or cross-organizational oversight in this area.

The issues discussed here come at a time of global attention on access to affordable housing for all (Madden & Marcuse, 2016), growing welfare conditionality in a number of housing systems (Watts and Fitzpatrick, 2018b), and concern about the increasing spread of housing financialisation. This growing prominence of actors and institutions servicing financial instruments drives housing commodification – the process by which economic value comes to dominate over use value – with the result that ‘living space will be distributed based on the ability to pay and provided to the extent that it produces a profit. But ability to pay is unequal while the need for a place to live is universal’ (Madden & Marcuse, 2016, p. 51). There could, therefore, be strong arguments in favour of affordable housing that targets middle-income households who are excluded from market-rate housing in commodified systems, and in a number of national contexts there has been a diversification of provision into different ‘affordable’ housing products (Czischke & van Bortel, 2018). Whilst the target groups and nature of providers differs (Czischke & van Bortel, 2018), there are examples of intermediate or mid-market ‘affordable’ products, such as Affordable Rent in England, ‘housing sociale’ in Italy (Pittini *et al.*, 2017), and the National Rental Affordability Scheme in Australia (Yates, 2013).

However, as the article highlights, in the English context the shift to ‘affordable’ housing is at the expense of provision of housing at social rents, accessible to those on the lowest incomes. Left unchecked, there is the potential for a ‘perfect storm’ in which welfare reforms and austerity policies increasingly push those on the lowest incomes into the private rented sector, increasing demand at the margins (Dewilde, 2018). Whilst we have elaborated on policy recommendations elsewhere (Hickman *et al.*, 2018), this article indicates that understanding the interaction of different

policy spheres is crucial, as is future monitoring of housing access for marginalized groups. The research raises the prospect that increased competition for a dwindling supply of truly affordable homes will magnify over time, leading to increasing conditionality and growing fissures in the social housing sector in relation to social values and the housing of those on the lowest incomes.

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## Appendix

**Table A1.** Respondent profiles.

Housing associations			
Organization code and description		Participant code	Participant description
HA1	Medium sized housing association operating in the North	HA1R1	Director
HA2	Large national housing association, including regionally concentrated stock	HA2R1	Director
		HA2R2	Research Officer
HA3	Large housing association operating in the South	HA3R1	Director
HA4	Large housing association operating in the South	HA3R2	Policy Officer
		HA4R1	Policy Manager
		HA4R2	Welfare Reform Officer
HA5	Large housing association operating in the South	HA4R3	Policy Officer
		HA5R1	Business Manager
HA6	Small housing association operating in London	HA5R2	Director
		HA6R1	Housing Manager
HA7	Medium housing association operating in rural areas	HA7R1	Director
		HA7R2	Housing Manager
HA8	Small housing association operating in the North	HA8R1	Housing Manager
HA9	Large housing association operating in the North	HA9R1	Director
		HA9R2	Welfare Reform Manager
HA10	Medium sized housing association operating in the North	HA10R1	Director
Stakeholders			
Organization code and description		Participant code	Participant description
S1	National tenant organization	S1R1	Chief Executive
S2	National stakeholder - England	S2R1	Policy lead with a focus on housing associations
S3	National stakeholder - Wales	S3R1	Policy lead with a focus on housing associations
S4	National stakeholder - Scotland	S4R1	Policy lead with a focus on housing associations
S5	National stakeholder - England	S5R1	Policy lead with a focus on local authorities
S6	National stakeholder - Northern Ireland	S6R1	Policy lead with a focus on housing associations
S7	National stakeholder - England	S7R1	Policy lead with a focus on housing associations and social security
S8	Key stakeholder organization in Northern Ireland	S8R1	Senior Manager
S9	Lender	S9R1	Chief Executive
S10	National government representative	S10R1	Not reported for anonymity
S11	Lender	S11R1	Head of Housing Finance