



Your details

Please complete the following details below. It is essential that we have a name and the name of any organisation if you are responding on their behalf. Contact details would be helpful if we need to follow up on any points.

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Would you like us to keep your response confidential:	No

Consultation questions

Below you will find response boxes for each of our consultation questions. If possible, please base your response on answers to these questions.

Some questions may be somewhat irrelevant to your interests, in which case please feel free to answer as many or as few as you like. And please feel free to offer other comments if you think they are relevant to our remit. There is space at the end for you to do so.

You can skip to the section(s) that you wish to respond to through the links below:

1. [Wellbeing](#)
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Section 1: Our assessment of the importance of housing for wellbeing in Scotland

Q.1. Has our assessment of housing and wellbeing missed any important benefits and, if so, which benefits and what is the evidence for this?

The assessment cites benefits of good housing in the context of eight types of wellbeing. From a children's sector perspective the concept of wellbeing is usually grounded in the context of the SHANNARI wellbeing indicators. The definition of wellbeing against these indicators is now grounded in statute following the passage of the Children and Young People (Scotland) Act 2014. Whilst some of these indicators are reflected in the types of wellbeing defined by the commission others are not referenced. From the perspective of the wellbeing of the child, the commission should recognise the importance of housing to the nurture of a child in particular. The importance of stable housing to a child's attachment is significant. Young people, particularly those who have been through several placements in the care system, can experience attachment disorder as a result of repeated placement breakdown and inconstancy in any one home. Attachment disorder has a profound detrimental impact on the 'Nurtured' well-being indicator. Similarly housing can have a material impact on the 'included' wellbeing indicator as well. If housing is remote, poorly served by utilities and infrastructure, then the inclusion of a child or young person may be compromised.

Q.2. Has our assessment exaggerated any of the benefits of housing for wellbeing and, if so, in what respects and what are your reasons for saying this?

The benefits of housing to wellbeing are not overstated in the assessment.

Section 2: Does Scotland invest enough in housing?

Q.3. Do you agree with our assessment of the current position on investment in housing?



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Yes. The commission rightly points to the fact that Scotland's increasing population is forecast to exert an increasing demand of up to 15,000 new homes per year for the next 25 years. With this unmet pressure of demand for new housing in the Scottish market comes an equivalent increased demand in the private rented sector which could serve to inflate the cost of housing at all levels in the market. This has a disproportionate impact on families in particular.

Q.4. Do you agree with our brief assessment of current policy on investment in housing?

Yes. It is clear that policy based on what is affordable, rather than on what is needed in terms of unmet housing demand will only see the problem worsen over time. Furthermore, the current housing crisis is not solely a product of the absence of housing but of a lack of an overarching strategy to all aspects of housing policy. The rights of tenants have improved to a degree with new duties on private rental landlords, but current policy on investment in the provision of housing is still insufficient to address the pressure on the private rented sector and the lack of local authority or housing association property.

Q.5. Do you agree with our suggestions for further action in the area of investment in housing?

We largely agree with the suggestions made by the commission in this regard. However, in the section on new housing, we would suggest that any targets for local house building be met with a complimentary strategy to ensure that new homes are equipped with the infrastructure necessary to deliver the eight kinds of wellbeing defined by the commission. In particular, for families this should seek to prevent overcrowding in schools and ensure that children have meaningful opportunities locally in which to access play. Grounding the aims of the commission in wellbeing as defined by GIRFEC and the SHANNARI wellbeing indicators would create a more comprehensive set of goals in this regard.



6. Do you have any other suggestions that we have not mentioned in relation to investment in housing?

Particular consideration should be given to the needs of young people leaving care. The provisions of the Children and Young People (Scotland) Act 2014 see significant duties on local authorities to provide assistance to care leavers up to the age of 26, including with regard to their accommodation. Scotland's care leavers represent one of the most vulnerable groups in our society and deserve special attention in any strategy around how we meet our obligations to them.

Additionally, the needs of people being liberated from prison should also be considered by the commission. In many cases, housing can act as a barrier to rehabilitation. On liberation, resettlement back into communities where offending behaviour took place can see former offenders placed back among peer groups and social pressures which led them to offend in the first place. Housing policy should take this into account and an effort should be made to consider housing and social location as a fundamental part of the rehabilitation of offenders.

Section 3: Getting a better fit between housing and the economy

Q.7. Do you agree with our assessment of the current position regarding housing and the economy? What more would you add?

Whilst much of what the commission has stated in this assessment is factual, the analysis is somewhat incomplete. To suggest that 6 years of low interest rates has been the sole driver for house price inflation is not necessarily accurate, particularly as much of the boom in the housing market in recent years occurred before the crash, when interest rates were higher. The analysis also paints a stark and somewhat simplistic picture when it states that there are

'...sharp divisions between those households who are owners and those who are not. People with wealth in housing have better life opportunities...'

This is arguably an unhelpful and simplistic generalisation and doesn't recognise those families who may own their home but might be over-extended on their mortgage, whose circumstances may have changed with the recession and who may have significant childcare costs to meet. Many of these families could fall into the 'working poor' demographic. To assume that home-ownership and affluence are always synonymous does these families a disservice.



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Q.8. Do you agree with our assessment of the current situation of UK Government policy with regards to the housing market and the economy?

Again, the Commission's assessment is fair and based in fact. We would add however that certain groups, particularly care leavers, have found it still harder to access finance with which to purchase housing as a result of the recession and the reluctance of banks to lend. Government policy such as help-to-buy is directed at first time buyers but doesn't always take account of the range of additional barriers to home ownership that care leavers face.

Q.9. What are your views about the five areas of policy reforms suggested here?

It would be inappropriate for Aberlour to take a position on the policy reforms suggested by the commission as we have no mandate from our service users or our board to do so.

Section 4: Getting a better fit between housing and welfare policy

Q.10. Do you agree with our assessment of the current position regarding housing and welfare benefits? What more would you add?

The commission is right to raise concerns around changes to housing benefit (or the housing component of the Universal Credit) which would see the cessation of direct payment of rent to private landlords. Aberlour provides services to families affected by substance use and for these families in particular, such a shift could prove problematic. For families struggling with dependency and other chaotic lifestyle factors, effective budgeting is often difficult and in extreme cases could result in rent default and eviction.



Q.11. Do you agree with our assessment of the current situation of government policy at UK levels and the possible outcomes post-referendum? What more would you add?

Without knowledge of the recommendations of the Smith Commission and how those recommendations might be implemented it would be inappropriate for us to comment. We are hopeful however that any changes to the devolution settlement will serve to make the housing and welfare system and our approach to these more coherent and ready to meet specifically Scottish housing needs.

Q.12. What are your views about the medium term policy options presented here? What other ideas and issues strike you over this time frame?

It would be inappropriate for Aberlour to take a position on the policy reforms suggested by the commission as we have no mandate from our service users or our board to do so.

Q.13. Do you agree that we have a unique opportunity to consider longer term policy options over the next key period in Scotland's history? How do you respond to the options proposed here? Are there other options that should be considered?

It would be inappropriate for Aberlour to take a position on the policy reforms suggested by the commission as we have no mandate from our service users or our board to do so.



Commission on Housing & Wellbeing

Q.14. Do you agree with our assessment of the importance of housing to the environment?

Whilst the commission's assessment and suggestions on the importance of housing policy to sustainability and the environment seem fair, given our focus, it would be inappropriate for Aberlour to offer meaningful comment here.

Q.15. Do you agree with our brief assessment of current policy on housing in relation to the environment?

Whilst the commission's assessment and suggestions on the importance of housing policy to sustainability and the environment seem fair, given our focus, it would be inappropriate for Aberlour to offer meaningful comment here.

Q.16. Do you agree with our suggestions for further action in the area of housing and the environment?

Whilst the commission's assessment and suggestions on the importance of housing policy to sustainability and the environment seem fair, given our focus, it would be inappropriate for Aberlour to offer meaningful comment here.

Q.17. Do you have other suggestions that we have not mentioned in relation to housing and the environment?

Whilst the commission's assessment and suggestions on the importance of housing policy to sustainability and the environment seem fair, given our focus, it would be inappropriate for Aberlour to offer meaningful comment here.

Section 6: Housing and Health and Education

Q.18. Do you agree with our on our assessment of the importance of housing to health and education?

The Commission's assessment is accurate but incomplete. It does not recognise the particular problems faced by children in care or care leavers in terms of placement breakdown and attachment disorder. Some looked after young people with particularly complex needs may find themselves moving from placement to placement and home to home when placements break down. This can have a deeply unsettling effect on these young people, particularly at a time when they should be sitting life qualifying exams. In addition to this, housing for young people when they leave care can vary dramatically with some young people being housed in emergency bed and breakfast or temporary homeless accommodation, which in turn can further compromise their ability to meaningfully engage in education, employment or training.

The Commission's assessment fails to look at issues surrounding young people who run away from home. Until recently and for 10 years, Aberlour provided Scotland's only refuge for young runaways. 1 in 9 young people will run away from home in Scotland at some point and a significant proportion will experience a variety of risks including physical and sexual abuse. Our refuge allowed us to provide sanctuary to young people in this situation for 10 years, but ultimately, funding cuts led to this being unsustainable. The plight of Scotland's young runaways remains an unmet need in Scotland and should be reflected in the considerations of the commission.

Another area missed by the assessment is the issue of domestic abuse. Agencies can place significant importance upon the non-abusive partner's ability to keep children safe. This lack of focus upon the abusive partner's parenting responsibilities (and real risks to life in many instances) can lead to mother and child/ren undertaking multiple property moves within short periods of time. These multiple moves can be the result of repeated attempts to flee, or for the reasons detailed below. A secure and stable base is important for a child's early development and attachment, and these moves can exacerbate the stresses associated with an already chaotic and traumatic time.

Women and children who have experienced domestic abuse may frequently have to make use of temporary accommodation whilst awaiting permanent accommodation. This temporary accommodation may be a hostel; bed and breakfast; or the preferred option of a temporary furnished flat. Hostels and bed and breakfasts tend to be deemed 'unsuitable'; however our experience has shown that without our support, a pregnant woman remained in this unsuitable accommodation for twice the statutory limit. Unsuitable accommodation may raise maternal and child stress, and also may result in the family being exposed to often chaotic adult lifestyle choices.

In the circumstance where temporary accommodation is more suitable, such as a temporary furnished flat, less than optimal family circumstances can still be experienced. In our experience, for larger families this 'temporary' base can act as home for up to 3 years: this uncertainty creates a lack of security for all involved, and repeated transitions can impact upon the emotional; social; and educational attainment of all involved.



19. Do you agree with our brief assessment of current policy on housing and health and education?

Again, the assessment is accurate but incomplete. The commission should review current Government policy for meeting the needs of young people leaving care. This will change significantly as a result of the leaving care provisions of the Children and Young People (Scotland) Act 2014. Housing provision for young people who leave care is often inappropriate and rarely arrived at through strategic consideration.

Q.20. Do you agree with our suggestions for further action in the area of housing and health and education?

Whilst these suggestions seem laudable, they are incomplete as they fail to address the additional policy areas (care leavers and young runaways) that we have raised.

Particularly with regard to domestic abuse, we would like to see housing recognised as essential for family and child welfare; and that future policy, legislation and practice focus upon streamlining the multiple and complex systems vulnerable families must navigate in times of crisis. We would also advocate that a multi-agency approach is taken, and that as much early work is undertaken as possible to minimise multiple moves for this vulnerable population.

Q.21. Do you have other suggestions which we have not mentioned in relation to housing and health and education?

A significant review of housing provision for care leavers must form part of the considerations of the Scottish Government's new 'Blueprint working group' of stakeholders tasked both to implement the provisions of the CYP Act and to explore the policy and sector capacity requirements of a right to return to care up to the age of 21 for young people who change their minds after leaving.



Section 7: Housing and Community Regeneration

Q.22. Do you agree with our on our assessment of the importance of community regeneration?

Whilst the commission's assessment and suggestions on the importance of community regeneration seem fair, given our focus, it would be inappropriate for Aberlour to offer meaningful comment here.

Q.23. Do you agree with our brief assessment of current policy on community regeneration?

Whilst the commission's assessment and suggestions on the importance of community regeneration seem fair, given our focus, it would be inappropriate for Aberlour to offer meaningful comment here.

Q.24. Do you agree with our suggestions for further action in the area of community regeneration?

Whilst the commission's assessment and suggestions on the importance of community regeneration seem fair, given our focus, it would be inappropriate for Aberlour to offer meaningful comment here.



Q.25. Do you have other suggestions which we have not mentioned in relation to community regeneration?

Not at this time.

Section 8: Do we need a more robust private rented sector?

Q.26. Do you agree with our views on the need for a more effective private rented sector which can make a greater contribution to meeting housing needs?

Given our focus, it would be inappropriate for Aberlour to offer meaningful comment here.

Q.27. Do you agree with our brief assessment of current policy on the private rented sector?

Given our focus, it would be inappropriate for Aberlour to offer meaningful comment here.



Q.28. Do you agree with our suggestions for further action in the private rented sector?

Given our focus, it would be inappropriate for Aberlour to offer meaningful comment here.

Q.29. Do you have other suggestions which we have not mentioned in relation to the private rented sector?

Given our focus, it would be inappropriate for Aberlour to offer meaningful comment here.

Do you have any further comments in relation to the Commission on Housing and Wellbeing's consultation paper?