

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](#)
2. [Housing and investment](#)
3. [Housing and the economy](#)
4. [Housing and welfare policy](#)
5. [Housing and the environment](#)
6. [Housing and health and education](#)
7. [Housing and community regeneration](#)
8. [The Private Rented Sector \(PRS\)](#)

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 definitions covered in the 8 types of well-being are fairly comprehensive. However it would be appropriate to highlight the sense of connection and belonging which good quality stable and secure housing can engender – this is particularly important for those more marginalised and at risk of or experience exclusion – **I would highlight particularly families of ‘looked after’ children and young people and care leavers**, where the local authorities and other public agencies have a corporate parenting responsibility. We know from research that transitions from care to interdependence can be a traumatic and de-stabilising time for young adults and access to a range of stable, secure and affordable housing, with associated person-centred support is essential to support their transition, on-going development and access to employment and education. This assists in addressing a number of vulnerabilities which care leavers are exposed to, meeting holistic needs and addressing issues of well-being. **Care leavers as a group are particularly prone to experience periods of homelessness post-care and into early adulthood, and this can impact severely on their well-being.**

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?

No exaggeration. As above for all, but particularly more vulnerable and marginalised groups, stable quality housing in a safe positive environment with well-developed inclusive community identity and access to amenities is a vital building block for physical and mental well-being. Arguably some of the changes in housing provision over the last 25+ years (eg council house sell-offs under right to buy with reduction in public stock, buy-to let in council areas to transient renters) has de-stabilised community cohesion. The buy-to-let market has also pushed up rents to, for many, unaffordable levels. <http://www.jrf.org.uk/publications/what-will-housing-market-look-2040>
This increases challenges for those young people with a care experience as many have little or no dependable /consistent extended family support to secure and maintain affordable housing.

Section 2: Does Scotland invest enough in housing?

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



See below

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

In essence yes. A national house building programme for affordable quality social housing which remains under control of public sector to meet social need , particularly for vulnerable and marginalised groups would address not just the need for new homes both to meet growing demand and replace unfit stock, but would also stimulate the economy in terms of construction and related work (think FDR). Home ownership is not and should not be promoted as the primary aspiration or goal in terms of housing policy. Ensuring that a range of quality housing is available and accessible should be about meeting the needs of communities and society as a basic human right.

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

Yes – as above

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

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?

Yes – see previous section. Private house values are not a realistic or sensible way to grow the economy or measure the wealth of society – it is essentially paper wealth and would agree that it can and does trap people financially, and geographically, and thus hamper the economy. Addressing, managing and preventing the over-heating housing market is crucial. Rapidly increasing house values, particular to specific geographic areas serves only the fortunate few investors or those wishing to downsize or move to cheaper areas. But for the vast majority it places often crippling financial burdens in terms of mortgages, or traps people in geographical areas limiting the potential movement of essential labour. These factors almost always impact most heavily on the lower/lowest paid and those without the family and social resources /supports to assist.

<http://www.jrf.org.uk/publications/what-will-housing-market-look-2040>

The current position effectively structurally excludes many - **particularly those young people with a care background** who often do not have the family or social support that many people rely on to assist them in accessing and maintaining affordable housing.

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?

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

Agree.

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?

In addition I would add that the issue regarding Housing Benefit caps is a bogus one. – we should perhaps instead address the issue of rent caps, ensuring that private landlords cannot ‘over-charge’ where local wage levels, or benefits, cannot adequately cover rental costs, even for modest properties. Effectively what we have at the moment is a state subsidy to private landlords who are over-charging (due to supply & demand) or subsidising employers who fail to pay staff a living wage; or staff who are subject to zero-hours contracts.

<http://www.jrf.org.uk/publications/what-will-housing-market-look-2040>

Care leavers are particularly vulnerable in this respect as they face greater challenges to access and sustain employment, and are more likely to be in low-paid or temporary employment or reliant on welfare benefits.

.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?

The impact of Universal Credit has particular risks for more vulnerable groups, **particularly care leavers who often lack the family and social support that is available to others**. Whilst for some including HB in their overall package of benefits would pose no significant issue, there are those who for a variety of reasons have difficulty in managing their personal budgets, and Universal Credit brings added challenges and risks. **This issue of vulnerability is heightened with regard to care leavers and care-experienced young adults**. The system needs to find a way to accommodate and meet the flexible, person-centred needs of young care-experienced adults. **The Children & Young People (Scotland) Act 2014 places responsibilities on local authorities and other designated ‘corporate parents’ to meet assessed needs of eligible care leavers up to the age of 26 to ensure their well-being**. This should enable and require the Scottish Government & Local Authorities to take the necessary steps to ensure that **care leavers as a specific group** are fully supported and not subject to detrimental adverse effects of any change in housing /welfare policy. This may also include mitigating the impact of ‘bedroom tax’ for care leavers who cannot find single person accommodation; or for those whose situations are more fluid due to changing and unpredictable family supports.



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?

No comment

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?

No comment

Section 5: Getting a better fit between housing and the environment

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

No comment



Commission on Housing & Wellbeing

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

No comment

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

No comment

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

No comment



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?

Yes – see below

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

Yes – see below

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

Yes – see below



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

I would highlight the impact of poor housing on more vulnerable families, and particularly those for whom the local authorities have a **'corporate parenting'** responsibility towards **looked after children**, and its impact on health and education. I would highlight the importance of ensuring that those most vulnerable families, where there is often a heightened risk of children **'coming into care'** have access to stable quality housing. It is very disruptive and damaging for children's development to experience multiple transitions at such an early age and this can impact on many other facets of their lives and can have lasting negative consequences. Temporary housing processes which involve numerous moves should be avoided. Over-crowding for already stressed families and the lack of opportunity to study and do homework all impact on the potential for those families and children & young people to make progress; and changing schools or having to travel increased distances to schools for children and young people due to housing instability or moves does not constitute good 'joined-up' working. Stable quality housing is as much of a positive contributing factor to promoting positive outcomes, and lack of creative partnership working in terms of addressing housing need can add to the already complex challenges faced in supporting vulnerable families and looked –after/'at risk' children. This has consequences for those children and families but also for housing and other support agencies who will be required in any event to respond to needs – our view is that greater awareness of the needs of this group of families and children and more proactive joined up activity would contribute greatly to the preventative and early intervention agenda. The potential longer–term benefits for all in terms of supporting struggling families, who might otherwise require significant state intervention, should be self-evident.

Section 7: Housing and Community Regeneration

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

No comment

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

No comment



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

No comment

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

No comment

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?

I would refer to my earlier comments regarding the private rented sector in relation to affordable rents and rent-caps, and the issue of housing benefit being paid to fund 'inflated' private sector rent charges. I would also agree that there needs to be greater powers to ensure that properties were maintained to an acceptable standard and that all necessary repairs were carried out timeously and effectively. This in itself links clearly to the impact on health and well-being of tenants.

Whilst the private rented sector has a key role to play, increasing the range of affordable quality social housing is also required.

<http://www.jrf.org.uk/publications/what-will-housing-market-look-2040>



Commission on Housing & Wellbeing

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

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

Yes we agree that we should ensure that tenants have greater tenancy security arrangements and that this should be informed primarily by the view that quality housing and security of accommodation is a building block to personal well-being and social cohesion and stability..

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



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

As per earlier comments, I would re-iterate the need to consider fully the needs of some of our most vulnerable and marginalised groups, namely families of looked after children, and young adults who have moved on from care experience.

The average age of leaving home across Scotland is around 26 years of age. This is in many cases to do with access to affordable housing, even for those young adults who are in regular employment. They can generally rely on family and positive social networks for support when they do move on. For young people and young adults who have a care background this journey is often significantly more challenging with a resultant impact on wellbeing and health. Often the instability experienced in earlier life is replicated into adulthood as they struggle to access and sustain affordable, safe and stable housing, thus compounding other difficulties.

The passing of the Children & Young People (Scotland) Act 2014 **enables care leavers and care experienced young people** to access support to address their well-being up to the age of 26 years, and places certain responsibilities on new designated 'corporate parents' across a range of public bodies, including housing providers. It would be important to make an explicit link or reference to this in any report that the Commission produces.