



## 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:	

## 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?

**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?

## Section 2: Does Scotland invest enough in housing?

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

Overall, we think this is an accurate reflection. We think a further issue is investment in the right type and size of housing to meet local need, which also constrains choice and has implications for other policies such as the bedroom tax and ability to “downsize”. We would argue the continued use of unsuitable accommodation such as hostel and bed and breakfast accommodation further evidences the lack of investment in housing. Although The Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014 is a welcomed addition to legislative protection, the range of vulnerable groups covered is limited. The length of time young people are now residing with or returning to reside with parents into adulthood may be a further indicator of investment and affordability issues. For young people whom this is not an option, the lack of available, appropriate accommodation is a significant issue.



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

The standard of private sector accommodation remains a significant issue and one which is currently being insignificantly addressed. In certain areas where this market is more relied upon, families and young people are living in sub-standard privately rented accommodation.

We agree with the commitment to building new, affordable, public sector housing.

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

**Q.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?

**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?

## 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?

For young people and particularly those with care experiences, the overlap between social security entitlements/legislation and housing legislation can present issues. We believe there is a disconnect between Scottish aspirations and attitudes to social security and well-being and those articulated by the current Coalition. As such, there is a tension between reserved (DWP)/devolved (housing & local government) matters and these seem unlikely to improve without constitutional reform or a new Government.

**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?

We think the concern about current government policy could be extended. Universal credit and the problems for tenants in managing their personal finances well are extremely significant and extend to managing the additional stress and pressure that this will bring which may have health implications and could result in vulnerable individuals facing risk of eviction and homelessness. The “bedroom tax” also has significant implications victims of domestic violence who have separate bedrooms as “panic rooms”, for foster carers who are unlikely to have children continually in placement but need additional bedrooms to be available for this and the parents of young people in secure care or prison who intend to return to reside in their family home on return to the community. For those being released from custody, the availability of this support and accommodation has a significant impact on successful reintegration and re-offending.

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**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?

We strongly agree with the abolition of the “bedroom tax” and separating of the housing elements from the single cash payment. We think any decision not to pay housing benefit directly to a landlord should take into account the tenants needs in order to prevent the concerns outlined in q.11 being realised. In addition, further exploration of the overlap between social security entitlements and housing legislation for young people and particularly those leaving care would be beneficial.



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**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?

## **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?

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



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

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

## **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?

We think the link between health and education should be stressed. In terms of housing and education, insecurity can come from being placed in temporary accommodation which may be outwith their local area and timescales for gaining permanent accommodation vary.



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

We feel a section on young people and government policy surrounding this group is missing and should be included. This could include issues of homelessness, unsuitable accommodation, and young people with care experiences.

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

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

Homelessness: Better identification of those who are homeless, particularly those in “hidden accommodation”, to provide a more comprehensive assessment and baseline of the problem.

Overcrowding: Establishment of a Government target for reducing overcrowding and strategy for the reduction and prevention of overcrowding.

Young people: Monitoring the implementation of The Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014 and considering the expansion of application of this Order.

Young people: Establishing a positive default bias across housing policy and practice for care experienced young people aged under 26 years including those leaving custody (discussed further below).

Young people: To support young people to sustain accommodation, housing providers and local authorities need to complete more robust assessments of individual needs and provide more comprehensive packages of support.

## Section 7: Housing and Community Regeneration



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

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

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

“Short assured tenancies” impact on housing stability and the readiness of local authorities to make housing adaptations, relevant for older people and those with disabilities. Replacing the current tenancy arrangements with longer or unlimited security would therefore be beneficial.



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

**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?

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



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

**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?**

A further suggestion that the Centre would propose is establishing a positive default bias for care experienced young people aged under 26 years including those leaving custody, which cuts across a number of the individual sections in the consultation. A default bias would mean where discretionary powers are available, these would fall in favour of care experienced young people. This default bias for care leavers is consistent with the proposed Scottish Care Leavers Convent and Access All Areas in England and Wales. For example in allocations, this would support young people gaining appropriate accommodation, as opposed to "hard to let", hostel or bed and breakfast accommodation. This would also ensure young people are not dealt with under homeless procedures. Moreover, discretionary powers in terms of policies on anti-social behaviour, non-payment of rent and so on would fall in favour of this group to support the sustainability of housing. Likewise this would apply to discretionary benefits, such as discretionary housing benefit.