



Consultation: Housing to 2040

28 February 2020

Giving all children in Scotland an equal chance to flourish is at the heart of everything we do. By bringing together a network of people working with and for children, alongside children and young people themselves, we offer a broad, balanced and independent voice. We create solutions, provide support and develop positive change across all areas affecting children in Scotland. We do this by listening, gathering evidence, and applying and sharing our learning, while always working to uphold children's rights. Our range of knowledge and expertise means we can provide trusted support on issues as diverse as the people we work with and the varied lives of children and families in Scotland.

Children in Scotland is pleased to respond to the consultation on the Scottish Government's draft vision and principles for homes and communities in 2040. All of Children in Scotland's work is underpinned by a rights-based approach, as outlined in the United Nations Convention on the Rights of the Child (UNCRC). We believe that the rights of children and families as articulated in the UNCRC must be at the heart of housing policy in Scotland, in particular Article 27 which states that children and young people have the right to living conditions that support them to develop and grow.¹ The Scottish Government and local authorities have a duty to provide adequate housing to children, young people and families. This is especially important in light of the Scottish Government's recent promise to incorporate the UNCRC into Scots law before the end of this parliamentary term.

Children in Scotland agrees with many of the visions outlined in Housing to 2040 and that this document presents an ambitious view of how housing can be improved to support better outcomes for children, young people and their families. However, we believe that the draft visions and principles could be improved by making stronger and more meaningful reference to the needs of children, young people and their families.

Our response will focus mainly on the impact of the draft visions and principles outlined in the Housing to 2040 document on children, young people and their families. Poor housing can have a lasting impact on the health and wellbeing of children and young people. It can lead to accidents, disability and chronic illness including respiratory problems.² The longer term consequences of housing related ill-health include less play and physical exercise, low educational attainment due to

¹ https://downloads.unicef.org.uk/wp-content/uploads/2016/08/unicef-convention-rights-child-uncrc.pdf?_ga=2.194136621.1029660356.1581264503-1269241194.1581264503

² https://england.shelter.org.uk/_data/assets/pdf_file/0016/39202/Chance_of_a_Lifetime.pdf

school absences and diminished employment opportunities later on in life.³ We are pleased to see that the consultation paper acknowledges this but we feel the strategy can and should go further to support children and young people. Proposals to achieve the ambitious goal of reducing child poverty should be encouraged to foreground the needs of children, young people and families, so children's rights must be a clear and guiding thread throughout the principles and visions.

Our response has been informed by our work with children and young people on their experiences with their communities and the housing system. Children in Scotland was a joint lead partner in the award winning Beyond4Walls (B4W) project.⁴ The project supported a group of young researchers to explore their requirements when moving into an independent tenancy for the first time. More recently, in the Health Inequalities participative research project⁵ we worked with young people living in areas of high deprivation in Glasgow and Dundee to explore how where they live could impact on the health of children and young people and how this might contribute to health inequalities in different areas. Their findings reflect many of the issues that children and young people have raised on these topics in other projects and engagements.

1) Do you have any comments on the draft visions and principles?

Children in Scotland agrees in principle with the overall vision for housing policy. We believe that the extensive list of visions and principles reflects the needs of children, young people and families on the whole. We are pleased to see that children and young people were engaged in the process of drafting the visions and principles. However, it remains unclear in the consultation documents how and to what extent their views contributed to shaping the visions and principles. While we recognise that the consultation paper and factsheet go some way to address the needs of children and young people, they remain largely absent from the documents and we would like to see more explicit reference made to children and young people throughout the visions and principles. Throughout this response, we will examine how and where in the Housing to 2040 document children and young people should be discussed.

Housing is not a solution alone to providing children and young people with the living conditions they need to help them develop and grow. We feel that the visions and principles as written alludes to this point but needs to make this clear by discussing potential links with other areas of Scottish Government work so that future housing policy can be best used to realise these visions. Below we outline our comments on some of the visions and principles. We will only focus on visions and principles relevant to children, young people and families.

Visions

A Well-functioning Housing System

We are encouraged to see an emphasis on affordability, fairness and choice underpinning the vision of a well-functioning housing system. We will expand on our thoughts on affordability in response to **Question 3**, below. Here we focus on the

³ https://england.shelter.org.uk/_data/assets/pdf_file/0016/39202/Chance_of_a_Lifetime.pdf

⁴ <https://childreninscotland.org.uk/beyond4walls/>

⁵ <https://childreninscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

supports and services that children, young people and families need to be able to access affordable housing.

We know from our work on the Beyond4Walls project that young people entering into the housing system for the first time are not always able to access support that would benefit them in their transition. This included information on housing options, budgeting advice, support services for young tenants, face-to-face services and accessible applications and other housing related materials.⁶ We believe that a vision for a well-functioning housing system in Scotland must directly address these issues and provide appropriate support.

Every facet of the housing system must be user-friendly. Engaging with the housing system, like making a tenancy application, can be a confusing process for young people as well as adults. One B4W focus group participant discussed a time they were discouraged after trying to make an application for social housing: *"I went down the housing to put my name down for a council house and... it was as if they were trying to kinda make it hard for you... they weren't approachable."*⁷ Housing services should be approachable and assist people when they find the process confusing.

This vision should explore opportunities to link in with other services where information on housing could be provided to young people, such as education. Beyond4Walls participants discussed how they would have liked to have learned about budgeting for rent and other housing costs in school: *"We don't know what's available, no one tells ye. When you're in school... they don't tell us how to manage our money"*⁸ School plays an important role in preparing children and young people with the life skills to be confident and responsible citizens.⁹ The school curriculum is just one way that housing policy can work alongside broader structures so that children and young people are better informed about their housing options.

We believe that for the housing system to function well it must work within the wider context of community. Housing in any given area would be more sustainable if supported by a range of services and supports that meet the needs of the community, such as childcare, transport infrastructure and supports for children, young people and adults who are affected by substance misuse. Support should not be limited to just those services that provide information or assistance related to housing specifically. We will discuss housing in relation to community further in response to

Question 7.

High Quality Sustainable Homes

We support the vision for high quality sustainable homes. Taking climate action is important to children and young people. Children in Scotland has supported the work of the Youth Climate Strike the environment is also a 'hot topic' for Changing our World, our children and young people's advisory group. Furthermore, a focus on

⁶ https://childreninscotland.org.uk/wp-content/uploads/2018/01/Beyond4Walls_Report.pdf

⁷ <https://evidencebank.org.uk/evidence/services/housing-support/>

⁸ <https://evidencebank.org.uk/evidence/education/learning-about-housing/>

⁹ <https://www.gov.scot/policies/schools/>

environmental action and reducing litter is a focus for the Scottish Youth Parliament through its Pack it Up, Pack it In campaign.¹⁰

Energy efficiency will also go some way to easing the cost of heating homes which can become a burden on families and young people living independently. A 2010 Shelter report found that 26% of UK families cut back on home fuel consumption because of their housing costs.¹¹ Families should not have to make the choice between a warm home and paying their rent.

As stated above, poor housing can have a lasting impact on children's health.¹² It is vital that all children, young people and families have warm, safe and well-maintained homes that support their development. All homes should be built to a high standard and be well-maintained. This includes ensuring that inadequate conditions like dampness, mould and poor windows are addressed promptly.

In the inevitable event that something doesn't work properly, families need to trust that these faults will be repaired or replaced within a reasonable time frame, which is not always the case for those living in affordable housing. One Beyond4Walls participant told us about their experience living in social housing: *"there's a lot that they're supposed to do but don't do. Like sometimes they're supposed to send a plumber out and it can take 3-4 weeks. There's been quite a few times my boiler has broken and someone has come out to fix it and not fixed it right... there was one time we had no heating for three days waiting for it to be fixed..."*¹³ More must be done to ensure that all homes are not just of a high quality but maintained to a high standard.

As outlined in Article 27 of the UNCRC, *'States Parties, in accordance with national conditions and within their means, shall take appropriate measures to assist parents and others responsible for the child to implement this right and shall in case of need provide material assistance and support programmes, particularly with regard to nutrition, clothing and housing'*¹⁴.

The vision for high quality sustainable homes must reflect the ambition of Article 27 of the UNCRC and include a clear commitment to safe housing conditions of a standard high enough ensure a fair start in life for all children in Scotland. We believe this should be frame positively within what the Scottish Government aims to achieve and not what it aims to mitigate.

Sustainable Communities

Our thoughts on sustainable communities will be addressed in response to **Question 7**.

Homes that Meet People's Needs

Principle 15, under the vision for 'homes that meet people's needs' states that 'everyone has a right to an adequate home', citing Article 11 of the International

¹⁰ <https://syp.org.uk/wp-content/uploads/2019/09/Pack-it-up-Pack-it-in-Report-.pdf>

¹¹ https://england.shelter.org.uk/_data/assets/pdf_file/0003/268752/The_Human_Cost.pdf

¹² https://england.shelter.org.uk/_data/assets/pdf_file/0016/39202/Chance_of_a_Lifetime.pdf

¹³ <https://evidencebank.org.uk/evidence/services/housing-support/>

¹⁴ <https://www.cypcs.org.uk/rights/uncrcarticles/article-27>

Covenant on Economic, Social and Cultural Rights (ICESCR).¹⁵ This principle would be strengthened by making direct reference to Article 27 of the UNCRC, which states that 'Every child has the right to a standard of living that is good enough to meet their physical and social needs and support their development.'¹⁶ This would further enhance the Principle as the Scottish Government has promised to incorporate the UNCRC into domestic law, while the ICESCR has not been incorporated and therefore remains largely unenforceable.^{17,18}

Children in Scotland also believes that acknowledging housing as a human and children's right is a key principle that should underpin the entire vision for housing in Scotland and should therefore be emphasised earlier and throughout the visions and principles, rather than solely at the end of the document.

3) Do you have any proposals that would increase the affordability of housing in the future?

We are happy that the consultation paper acknowledges the important role housing must play in addressing child poverty. Good quality homes and communities support children and young people in every aspect of their lives but access to these for many families is often limited by the cost of housing.¹⁹

For housing to play an effective role in reducing child poverty, clear action must be taken to reduce housing costs across the board. Families experiencing disadvantage are disproportionately affected by housing costs.²⁰ According to the Scottish Government's own analysis, 50,000 children were estimated to have moved into poverty because of housing costs from 2015-2018.²¹ The Poverty and Inequality Commission's recent report on housing wealth inequality highlights that wealth inequality has been on the increase since 2018, they argue that this contributes to inequalities in access to housing due to increases in housing costs.²²

In response to this question, we refer to our response to the proposed Fair Rent Bill in July 2019 and will reiterate our support for a number of those suggestions which we feel would help make it easier for young people and families to access affordable housing with a focus on how these relate to child poverty.²³

The high cost of private housing urgently needs addressed. Child poverty is on the rise²⁴ along with the cost of renting in the private sector, which has increased across

¹⁵ <https://www.ohchr.org/Documents/ProfessionalInterest/cescr.pdf>

¹⁶ https://www.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_summary-1.pdf

¹⁷ <http://www.scottishhumanrights.com/economic-social-cultural-rights/>

¹⁸ https://scotland.shelter.org.uk/_data/assets/pdf_file/0010/1657801/Housing_is_a_human_right_FINAL_100119.pdf/_nocache

¹⁹ https://housingevidence.ac.uk/wp-content/uploads/2019/07/190722-Housing-wealth-inequality-scotland_final_1.pdf

https://england.shelter.org.uk/_data/assets/pdf_file/0003/268752/The_Human_Cost.pdf

²⁰ [https://www.parliament.scot/S5MembersBills/20190513_Final_Version_\(2\).pdf](https://www.parliament.scot/S5MembersBills/20190513_Final_Version_(2).pdf)

²¹ <https://www2.gov.scot/Topics/Statistics/Browse/Social-Welfare/IncomePoverty/povertytable>

²² <https://povertyinequality.scot/wp-content/uploads/2019/07/Poverty-and-inequality-housing-wealth-inequality-summary-report.pdf>

²³ https://childreninScotland.org.uk/wp-content/uploads/2019/08/Proposed-Fair-Rent-Bil_Final.pdf

²⁴ <https://www.resolutionfoundation.org/app/uploads/2019/03/Wrong-direction-briefing-note.pdf>

Scotland since 2010 and, in some areas, above the rate of inflation.²⁵ As of 2017/2018, 30% of all children living in severe poverty in Scotland are living in privately rented homes.

We know from our Beyond4Walls work that the high cost of rent is also a significant barrier for young people transitioning to independent living.²⁶ Increasing numbers of young people are entering the private rental market due in large part to high unemployment and a lack of social housing.²⁷ Young people must also be able to enter tenancies with the confidence that costs would not increase beyond what they can afford, which includes "hidden costs" like utilities and agency fees:

*"I rented privately through an agency and there's a lot of little things you don't realise were going to cost you."*²⁸

The Scottish Government should act quickly and implement measures to bring down high rent costs and rent capping to give young people and families in privately rented homes a sense of security. We supported these measures in our response to the proposed Fair Rent Bill. If Parliament is not in favour of rent capping than alternative proposals must be put forward. The Scottish Government must also do more to address high unemployment by creating sustainable job opportunities for young people throughout Scotland. Young people are too often pushed to make a choice between where they want to live and where they can find work: "there is nothing here, no jobs, no nothing."²⁹

More work should be undertaken to improve the quantity and quality of the social housing supply in Scotland to ensure that children, young people and their families have affordable homes where and when they need them. Families should not have to choose between moving or separation and good housing:

*he probably thinks you can get a house easily but the community I am from I know it's not that easy, I think there should be more support for young people and vulnerable people and deprived people who have been kicked out of their house.*³⁰

*My sister has four kids and she stays in a two bedroom hoose because she cannae get anywhere bigger in this community.*³¹

The Scottish Government must ensure that the broader structures are in place to support families to afford housing that meets their needs. Learning from the CHANGE project has highlighted a significant lack of childcare options in an area of high deprivation.³² Families living in social housing must be able to access the full childcare entitlement under the ELC expansion to support them to work. The Government and local authorities should work to ensure that there is a sufficient

²⁵ <https://www.gov.scot/publications/private-sector-rent-statistics-2010-2018/>

²⁶ https://childreninscotland.org.uk/wp-content/uploads/2018/01/Beyond4Walls_Report.pdf

²⁷ <https://www.jrf.org.uk/report/housing-options-and-solutions-young-people-2020>

²⁸ <https://evidencebank.org.uk/evidence/services/housing-support/>

²⁹ <https://evidencebank.org.uk/evidence/poverty/positive-opportunities/>

³⁰ <https://evidencebank.org.uk/evidence/places/accessing-housing/>

³¹ <https://evidencebank.org.uk/evidence/services/housing-support/>

³² https://www.gcph.co.uk/children_and_families/change-childcare_and_nurture_glasgow_east
<http://change-childcare.org/what-have-we-learned-so-far-childminding-in-the-change-project-area/>
<http://change-childcare.org/what-have-we-learned-so-far-childcare-for-children-aged-0-2/>

amount and choice of childcare across Scotland and that these are accessible by adequate and affordable transport links.

Making home-ownership more affordable would also go some ways toward mitigating these issues. As we have referred to previously in this response, a report by the Poverty and Inequality Commission shows that housing wealth inequality in Scotland is growing.³³ The dwindling supply of entry-level homes impacts young people especially and could have the effect of 'locking-out' younger people from property ownership, with long-term negative effects on economic productivity at the national level and contributing to furthering intergenerational inequalities.³⁴ Unequal home ownership can deepen existing inequalities in part through exacerbating spatial segregation due to the high cost of homes in some areas. This makes it more difficult for young people and families on lower incomes – who are significantly less likely to own their homes – to have a choice in where they live.³⁵

The Scottish Government should consider a range of options to support young people and people on lower incomes to enter the housing market. When considering measures in this area we refer the Scottish Government to the work of the Poverty and Inequality Commission. They argue that models for sustainable home ownership may be useful, however it is important that demand is not stimulated to the point house prices increase and make it hard for people to buy a first home such as has occurred under the Help to Buy scheme.³⁶ It is also worth considering their recommendation to consider how to reduce demand for owning a second home, reform of council tax to make this more progressive and taxing housing wealth more effectively.³⁷

The benefits of home ownership include security and increased socio-economic mobility, which can help lessen inequalities more broadly. The Scottish Government should consider measures to make home ownership more accessible to young people and families on lower incomes.

A balanced housing market with a good mix of social housing, private rentals and owner occupancies is needed to meet the different needs of all children, young people and families in Scotland. The Scottish Government must explore how it can provide truly affordable social housing including through building new homes and bringing houses back into the social rented market. It needs to ensure that these

³³ <https://povertyinequality.scot/wp-content/uploads/2019/07/Poverty-and-inequality-housing-wealth-inequality-summary-report.pdf>

³⁴ https://housingevidence.ac.uk/wp-content/uploads/2019/07/190722-Housing-wealth-inequality-scotland_final_1.pdf

³⁵ <https://povertyinequality.scot/wp-content/uploads/2019/07/Poverty-and-inequality-housing-wealth-inequality-summary-report.pdf>

³⁶ <https://povertyinequality.scot/wp-content/uploads/2019/07/Poverty-and-inequality-housing-wealth-inequality-summary-report.pdf>

³⁷ <https://povertyinequality.scot/wp-content/uploads/2019/07/Poverty-and-inequality-housing-wealth-inequality-summary-report.pdf>

plans link in with policies that support children, young people and families like the child poverty delivery plan,³⁸ Play Strategy³⁹ and National Transport Strategy.⁴⁰

7) Do you have any proposals that would improve the space around our homes and promote connected and vibrant communities?

Our recent Health Inequalities project highlighted many aspects that children and young people did not like about their communities, including things that make them feel unsafe, like the prevalence of crime and substance abuse.⁴¹ Putting high quality housing in place is important but it will not solve underlying problems within communities where crime and substance misuse feature. Accessible and supportive community resources and services for children and adults dealing with substance misuse must also be put in place.

Evidence of crime and substance misuse meant that some children felt unable to play in parks and green spaces in their local neighbourhoods so support for these would also contribute to safer public spaces and parks.⁴² Children and young people need access to safe outdoor spaces that support them to play and do physical activity.⁴³

Learning from the Health Inequalities project also underscores that the quality and attractiveness of the parks and spaces around homes can have an effect on children's wellbeing beyond having space to play, because abandoned, derelict or poorly maintained public spaces can contribute to the stigmatising of certain areas and of people who live there.⁴⁴ We support initiatives like that of the Scottish Land Commission to refurbish and repurpose vacant and derelict land.⁴⁵

Community planning must also consider and build on what children and young people like about where they live and what they say they want like places, markets and events where they can meet other people from the community. Accessible, free or affordable play spaces and activities will support children and young people to play, exercise, socialise and spend time with their families. It is important then that housing and community developments are designed to support the Scottish Government's aim as set out in the Play Strategy, *'to ensure that all children and young people can access play opportunities in a range of settings which offer variety, adventure and challenge'*⁴⁶.

Children and young people in the Health Inequalities project told us that they enjoy eating out with family and friends, but often the only options that are close and

³⁸ <https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2018/03/child-chance-tackling-child-poverty-delivery-plan-2018-22/documents/00533606-pdf/00533606-pdf/govscot%3Adocument/00533606.pdf>

³⁹ <https://www2.gov.scot/resource/0042/00425722.pdf>

⁴⁰ <https://www.transport.gov.scot/our-approach/national-transport-strategy/>

⁴¹ <https://childreninscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

⁴² <https://childreninscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

⁴³ <https://www2.gov.scot/resource/0042/00425722.pdf>

⁴⁴ <https://childreninscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

⁴⁵ <https://landcommission.gov.scot/our-work/housing-development/vacant-and-derelict-land>
https://landcommission.gov.scot/downloads/5dd7d4dfa39b6_VDL%20in%20Scotland%20Final%20Report%2020191008.pdf

⁴⁶ <https://www2.gov.scot/resource/0043/00437132.pdf>

accessible are fast food restaurants.⁴⁷ We know that areas of high deprivation have greater concentrations of fast food restaurants and advertising compared to more affluent areas. Therefore, children who live in these areas are more likely to be exposed fast food on a regular basis which can have a significant impact on their diet, affecting health outcomes later in life. The Scottish Government should consider ways to limit the presence of fast food restaurants and advertising in these areas while promoting access to affordable, healthy food options for all children, young people and their families.

Vibrant, well connected communities will not be achieved through housing alone. Listening to how children and young people feel about where they live will help community planners and decision makers design communities that promote better outcomes for all children, young people and their families. Children in Scotland agrees with the bold aspirations expressed in the consultation document like eradicating child poverty, but we believe these will only be possible if future housing policy clearly links in with other areas of Scottish Government work, many of which we have mentioned throughout our response, but which include (and are not limited to):

- The Play Strategy
- Place Standard
- National Planning Framework
- National Transport Strategy
- Child Poverty Delivery Plan
- Early Learning and Childcare expansion
- Policing 2026 strategy
- Mental Health Strategy 2017-2027
- GIRFEC
- UNCRC Incorporation

Communities need to work for and be enjoyed by everyone who lives in them, including children and young people. We have heard repeatedly from children and young people in Scotland about what they like and do not like about their communities and the spaces around their home. Community planning must take their views into account. The Scottish Government should honour the rights laid out in UNCRC Article 12 for children and young people to have their views and wishes considered in all decisions that affect them by keeping this at the heart of future housing policy in Scotland. The consultation document could reflect this with reference to the UNCRC and to the new National Planning Framework to ensure that children and young people are meaningfully involved in decision-making at every stage. It should also acknowledge the obligations of planning authorities as outlined in the Planning Act Section 7 to promote and facilitate engagement by children and young people in the preparation of local development plans⁴⁸.

8) Any other comments

Impact Assessments

⁴⁷ <https://childreninscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

⁴⁸ <http://www.legislation.gov.uk/asp/2019/13/section/7/enacted>

Children in Scotland believes that all Scottish Government future proposals relating to housing should be subject to a Child Rights Wellbeing and Equalities Impact Assessments to ensure that they effectively promote the rights and wellbeing of children and young people.

UNCRC Incorporation

Children in Scotland was further surprised to see that the impact of UNCRC incorporation is not discussed in any of the visions or principles within the consultation document. We recommend that this is rectified, as outlined above.

Engagement

Children in Scotland is pleased to see that children and young people across Scotland were engaged in the planning of the visions and principles which comprise Housing to 2040. However, it is unclear how the visions and principles were informed by their views. The visions and principles should clearly show how and where the views of children and young people were taken into consideration to ensure that their needs are reflected throughout the document. Doing so would also demonstrate to children and young people how they contributed to this process. It is important that the engagement of children and young people continue to be meaningfully involved at every stage. We also would refer the Scottish Government to our Principles and Guidelines for the Meaningful Participation of Children and Young People to support all future engagement work.⁴⁹

Clarity

Children in Scotland feels that the visions and principles lack clarity. While we recognise that many of the elements comprising the visions interlink, we feel that the document could be amended to provide more clarity across the four vision categories. Explicit links to other policies, like those outlined above, would help strengthen and give clarity to the visions and principles. This would also help ensure that proposals consider how they link in with key areas of government work to support better outcomes for all children, young people and families across Scotland.

⁴⁹ <https://childreninscotland.org.uk/wp-content/uploads/2019/09/CiS-Participation-2019.pdf>