

Fair Rents (Scotland) Bill

Introduction

A proposal for a Bill to protect private sector tenants by introducing measures to limit rent increases and to increase the availability of information about rent levels. The consultation runs from 15 May 2019 to 6 August 2019. All those wishing to respond to the consultation are strongly encouraged to enter their responses electronically through this survey. This makes collation of responses much simpler and quicker. However, the option also exists of sending in a separate response (in hard copy or by other electronic means such as e-mail), and details of how to do so are included in the member's consultation document. Questions marked with an asterisk (*) require an answer. All responses must include a name and contact details. Names will only be published if you give us permission, and contact details are never published – but we may use them to contact you if there is a query about your response. If you do not include a name and/or contact details, we may have to disregard your response. Please note that you must complete the survey in order for your response to be accepted. If you don't wish to complete the survey in a single session, you can choose "Save and Continue later" at any point. Whilst you have the option to skip particular questions, you must continue to the end of the survey and press "Submit" to have your response fully recorded. Please ensure you have read the consultation document before responding to any of the questions that follow. In particular, you should read the information contained in the document about how your response will be handled. The consultation document is available here: [Consultation document](#) [Privacy Notice](#)

I confirm that I have read and understood the Privacy Notice attached to this consultation which explains how my personal data will be used

About you

Please choose whether you are responding as an individual or on behalf of an organisation. Note: If you choose "individual" and consent to have the response published, it will appear under your own name. If you choose "on behalf of an organisation" and consent to have the response published, it will be published under the organisation's name.

on behalf of an organisation

Which of the following best describes you? (If you are a professional or academic, but not in a subject relevant to the consultation, please choose "Member of the public".)

No Response

Please select the category which best describes your organisation

Third sector (charitable, campaigning, social enterprise, voluntary, non-profit)

Optional: You may wish to explain briefly what the organisation does, its experience and expertise in the subject-matter of the consultation, and how the view expressed in the response was arrived at (e.g. whether it is the view of particular office-holders or has been approved by the membership as a whole).

deafscotland is the leading, membership based organisation dealing with deafness in Scotland. It promotes a spectrum of deafness with four key pillars: Deaf/Deaf Sign Language users (12,500);

Please select the category which best describes your organisation

Deafened (355,000); Deafblind (4,000); and Hard of Hearing (600,000). It campaigns for access, equality and citizenship, promotes British Sign Language and participation through "communication for all".

Please choose one of the following:

I am content for this response to be published and attributed to me or my organisation

Please provide your name or the name of your organisation. (Note: the name will not be published if you have asked for the response to be anonymous or "not for publication". Otherwise this is the name that will be published with your response).

Janis McDonald, Chief Officer, deafscotland

Please provide details of a way in which we can contact you if there are queries regarding your response. Email is preferred but you can also provide a postal address or phone number. We will not publish these details.

Aim and approach - rent cap

Q1. Which of the following best expresses your view of capping private sector rent increases annually across Scotland at one percentage point above inflation (measured according to the Consumer Price Index (CPI))?

Partially supportive

Please explain the reasons for your response.

We support the principle. We are not experienced enough to understand a blanket approach to meet any local variations. We understand this approach is a useful component of a raft of solutions including the building of more affordable homes, bringing more properties back into use for housing and sensitive levers when dealing with the impact of benefits (particularly housing benefit).

Rent level appeals

Q2. Which of the following best expresses your view of providing that, when tenants appeal their rent, rent officers and the First-tier Tribunal would be able to either lower or maintain the rent but not increase the rent?

Fully supportive

Please explain the reasons for your response.

Whilst the rented sector is changing many are on limited and fixed incomes. Increasing rents make it difficult to afford stability and often trigger other issues that lead to the worsening of poverty and debt.

Q2. Which of the following best expresses your view of providing that, when tenants appeal their rent, rent officers and the First-tier Tribunal would be able to either lower or maintain the rent but not increase the rent?

Being able to negotiate regarding property standards and in effect claim reductions and/or rebates for poor accommodation and services would be a good thing to maintain quality, dignity and respect.

Landlord registration scheme

Q3. Which of the following best expresses your view of expanding the landlord registration scheme so that landlords must input the rent that they charge when they register, and update the system when the rent changes?

Fully supportive

Please explain the reasons for your response.

Creating and maintaining standards, openness and fairness is only right in a modern, rights based world.

Other options - Rent Pressure Zones

Q4. Which of the following best expresses your view of tackling the problem of rents rising significantly faster than inflation by making it easier for a local authority to apply to create a Rent Pressure Zone (RPZ)?

Partially supportive

Please explain the reasons for this response.

We support the principle but are not experts in this area and again need to defer to those that know more about flexibility to deal with all local circumstances.

Financial implications

Q5. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have on:

	Significant increase in cost	Some increase in cost	Broadly cost-neutral	Some reduction in cost	Significant reduction in cost	Unsure
Government and the public sector			X			
Businesses (including landlords)			X			

Q5. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have on:

Individuals (including tenants)				X		
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Please explain the reasons for your response.

We recognise the immediate impact might not be significant, particularly where there are pressures on landlords and local authorities. We would anticipate time to ensure standards were in place and the initiative prevented profiteering rather than created an impossible socio-economic solution to a fundamental right.

Q6. Are there ways in which the Bill could achieve its aim more cost-effectively (e.g. by reducing costs or increasing savings)?

We believe providing initiatives to support landlords create "greener" and fairer areas might assist integrated rentals where power and housing are combined for example and wonder if the narratives around childcare and care could be altered by similar dynamics.

Equalities

Q7. What overall impact is the proposed Bill likely to have on equality, taking account of the following protected characteristics (under the Equality Act 2010): age, disability, gender re-assignment, maternity and pregnancy, marriage and civil partnership, race, religion or belief, sex, sexual orientation?

Slightly positive

Please explain the reasons for your response.

We would want to ensure that access to good quality information was available in accessible formats including language, plain English, plain text and easy read for example. We would hope some issues of wage inequality could be addressed and taken into account when reviewing rents particularly in relation to carer responsibilities which often fall to women. We wonder if some incentives to support accessibility more generally (including mobility and other adaptations) can be promoted too.

Q8. In what ways could any negative impact of the Bill on equality be minimised or avoided?

Perhaps with the involvement of people in engagement & consultation activity, some flexibilities within the benefits system and some capability for pilot & early review.

Sustainability

Q9. Do you consider that the proposed Bill can be delivered sustainably, i.e. without having likely future disproportionate economic, social and/or environmental impacts?

Unsure

Q9. Do you consider that the proposed Bill can be delivered sustainably, i.e. without having likely future disproportionate economic, social and/or environmental impacts?

Please explain the reasons for your response.

Do think more imaginative rental opportunities could be developed integrating power and/or care for example. Not aware enough of the longer term financial forecasts for rented sector however remain concerned that without substantial building/creation of homes the market pressures will continue to create unsustainable solutions.

General

Q10. Do you have any other comments or suggestions on the proposal?

Not at this time.