Children's Rights and Wellbeing Impact Assessment – Private Housing (Tenancies) (Scotland) Bill



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Executive Summary

The Private Housing (Tenancies) (Scotland) Bill will introduce a new tenancy for all future private rented sector (PRS) lets. The overall aim of the new tenancy is to provide security, stability, and predictability for tenants along with appropriate safeguards for landlords, lenders and investors. The Government understands the growing role that the private sector plays in meeting housing need – and how, as part of that, it is housing a wider variety of households than ever before.

The main aspects of the provisions are:

- The introduction of a statutory, open-ended tenancy for all future PRS lets. Following an initial period, in which the landlord may only give notice under very specific circumstances, this tenancy will continue indefinitely with both parties able to give notice at any time if a repossession grounds exists or the tenant wants to leave.
- Landlords will no longer have the ability to regain possession
 of their property simply because the tenancy has come to its
 natural end (otherwise known as the 'no-fault' ground).
 Instead, they will be required to use one of the proposed new
 grounds for repossession.
- Twelve of the repossession grounds are mandatory which means that if the First-tier Tribunal is satisfied that the ground exists they must order possession of the property. The remaining four grounds (breach of tenancy agreement, rent arrears, antisocial behaviour and property to be sold by mortgage lender) have both a mandatory and a discretionary strand. For the discretionary strand, if the Tribunal is satisfied that the ground exists, it will still have discretion on whether to issue an eviction order.
- A standard 12-week notice period for a landlord to give a tenant who has been in the property for longer than six months will be introduced. Currently, the maximum afforded to tenants is 40 days.
- Rents can only be reviewed once in a 12 month period (with 12 weeks' advance notice) to allow rent predictability. Tenants will also be able to refer perceived unreasonable rent increases for adjudication to protect them from unfair rent rises.
- Ministers will have the power to cap rent increases for sitting tenants in local Rent Pressure Zones.

Children's rights are inextricably linked with the rights of parents and carers. This policy represents a transformational change for the parents and carers of children within the PRS, allowing families significantly increased security within their homes, communities and

schools. This security of tenure will have a direct impact on children's rights, affording them not only a more stable home but stability within communities and schools. Further, there is evidence to demonstrate that security of tenure may in turn impact upon their educational development. It will also afford 16-18 year olds who live independently within the PRS these same advantages.

We therefore consider that of the eight wellbeing indicators (Safe, Healthy, Achieving, Nurtured, Active, Respected, Responsible, Included (known by the acronym SHANARRI)), the policy relates to:

- Achieving: Being supported and guided in their learning and in the development of their skills, confidence and self-esteem at home, at school and in the community.
- Included: Having help to overcome social, educational, physical and economic inequalities and being accepted as part of the community in which they live and learn.
- Nurtured: Having a nurturing and stimulating place to live and grow.

Of the UNCRC considerations, the policy relates to:

- Article 6 (2) The right to life. That is, 'ensure to the maximum extent possible the survival and development of the child'.
- Article 23 (1) The rights of a disabled child. That is, 'a
 mentally or physically disabled child should enjoy a full
 and decent life, in conditions which ensure dignity,
 promote self-reliance and facilitate the child's active
 participation in the community'.
- Article 27 (1-3) Adequate standard of living. That is, 'the right of every child to a standard of living adequate for the child's physical, mental, spiritual, moral and social development'.
- Article 28 (1e) Right to education. That is, 'takes measures
 to encourage regular attendance at schools and the
 reduction of drop out rates'.
- Article 30 Culture and community. That is, 'shall not be denied the right, in community with other members of his or her group, to enjoy his or her own culture...'
- Article 31 (2) Leisure and play. That is, 'encourage the provision of appropriate and equal opportunities for cultural, artistic, recreational and leisure activity'.

The available evidence shows us that the number of families and young people within the PRS has grown significantly in recent years and that a secure home protects and promotes the wellbeing of children and young people. We have also been able to identify a number of possible positive outcomes for different groups of children and young people with protected characteristics.

The results of this CRWIA demonstrate that there are no potentially negative impacts of the proposals. This is because they not only comply with the UNCRC requirements but have the potential to

advance the realisation of children's rights and wellbeing. Particularly those who, or whose families, may have found it difficult to access and maintain a secure home and place in the community previously. During this assessment key barriers to the wellbeing of children and young people which exist under the current PRS tenancy were identified. These included access to stable, longer-term housing options and therefore settled community and school lives.

As this is a transformational change there is no reliable evidence to demonstrate the likelihood of the impact, however the positive effects would potentially be significant.

This CRWIA was informed by a range of evidence, including two full public consultations.

Background

In 2013 a Private Rented Sector Tenancy Review Group was tasked with examining how suitable and effective the current PRS tenancy system was, and considering whether changes in the law were needed. The Review Group produced a report for Ministers in May 2014. The report's main recommendation was 'that the current tenancy for the Private Rented Sector, the Short Assured Tenancy and the Assured Tenancy, be replaced by a new private tenancy that covers all future PRS lets'. Ministers accepted this recommendation.

The first public consultation on initial proposals for a new tenancy took place between 6 October 2014 and 28 December 2014. We received more than 2500 responses from a broad mix of interested parties including industry bodies, tenants, tenant representative organisations, landlords, landlord representative organisations, letting agents, investors, local authorities and campaign groups. The second consultation built on these policy proposals. Taking account of the feedback and analysis from the first consultation, it addressed the key issues raised. It also sought views on these more-developed proposals as well as a partial EQIA. This received over 7500 responses.

Scope of the CRWIA

The likely effects of the proposals were assessed through a range of evidence, including two full public consultations.

Scottish Government Housing Policy officials and Analytical Services colleagues also examined evidence from a variety of studies, reports and surveys, including:

 The Scottish Government's 2009 Review of the Private Rented Sector. This provided a detailed primary evidence base on the sector in Scotland, including information relating to vulnerable groups.²

¹ Scottish Government (2014) Private Rented Sector Tenancy Review Group – Report; Available at: http://www.gov.scot/Topics/Built-Environment/Housing/privaterent/government/Tenancy-Review/report

Review/report

The Scottish Government (2009) Private Rented Sector Review; Available at: http://www.scotland.gov.uk/Topics/Built-Environment/Housing/privaterent/government/prsreview

- The Scottish Government's 2013 Evidence Review of the Private Rented Sector Tenancy Framework in Scotland. This provided an overview of some of the key issues relating to the private rented sector in Scotland, particularly focussing on the tenancy framework.3
- Craigforth's 2014 Qualitative research to explore the implications for private rented sector tenants and landlords of longer term and more secure tenancy. This provided an outline of tenants' and landlords' knowledge and understanding of the current tenancy, including its advantages and disadvantages.4
- Results from the 2013 Scottish Household Survey . Scottish Government Analytical Services provided further analysis of these with regard to protected characteristics, including age.5
- Results from the 2012 Scottish House Conditions Survey. This provides further detail of the physical condition of housing stock.⁶
- 2011 Census data. This provided further information regarding the profiles of tenants within the PRS.⁷
- Consultation on a New Tenancy for the Private Sector: Analysis of Consultation Responses. As part of this consultation, six tenants focus groups were undertaken by an external contractor. These were aimed at reaching those tenants who may not normally engage with key stakeholders or public consultations and as such would not have been adequately represented otherwise. We also received over 2500 responses to the consultation, which included key stakeholders such as industry bodies and third sector organisations, as well as individual tenants and landlords.8
- Second Consultation on a New Tenancy for the Private Sector: Analysis of Consultation Responses. We received over 7500 responses to this consultation, which consulted on a partial EQIA.9
- The Scottish Government (2010) A Thematic Review of Literature on the Relationship between Housing, Neighbourhoods and Schools. This presents a

sector tenants and landlords of longer term and more secure tenancy; Available at: http://www.scotland.gov.uk/Publications/2014/03/7326

The Scottish Government (2013) Scottish House Conditions Survey 2012; Available at: http://www.scotland.gov.uk/Publications/2013/12/3017

³ The Scottish Government (2013) Evidence Review of the Private Rented Sector Tenancy Framework in Scotland; Available at: http://www.scotland.gov.uk/Resource/0044/00449746.pdf ⁴ The Scottish Government (2014) Qualitative research to explore the implications for private rented

More general data from the Scottish Household Survey is available here: http://www.scotland.gov.uk/Topics/Statistics/16002 Scottish Government Analytical Services provided further analysis of this.

National Records of Scotland (2014) Census 2011: Release 3J - Detailed characteristics on Housing and Accommodation in Scotland; Available here: http://www.scotlandscensus.gov.uk/news/census-2011-release-3jdetailed-characteristics-housing-and-accommodation-scotland

8 The Scottish Government (2015) Consultation on a New Tenancy for the Private Sector: Analysis of

Consultation Responses; Available at: http://www.gov.scot/Publications/2015/03/1968/0

The Scottish Government (2015) Second Consultation on a New Tenancy for the Private Sector: Analysis of Consultation Responses; Available at: http://www.gov.scot/Publications/2015/08/3653

- comprehensive review of the evidence relating to the relationship between housing and education.¹⁰
- Scottish Government (2013) Growing Up in Scotland.
 Growing Up in Scotland is the longitudinal research study tracking the lives of thousands of children and their families from the early years, through childhood and beyond. Housing is covered as part of this.¹¹

Children and young people's views and experiences

While there is a lack of research detailing children's views on the issue of security of tenure specifically, there is substantial evidence of the views of parents/ carers and third sector organisations. Qualitative research exists on the views and experiences of those within the sector, as well as research and consultation relating specifically to these proposals. There is also evidence on the composition of the PRS generally, allowing us to accurately determine how many children and young people may be affected. As the rights of children/ young people and their parents/ carers are inextricably linked, we consider that the available evidence provides a good basis for examining the impact of the proposals upon children and young people. The available evidence shows us that the number of families in the PRS has grown significantly in recent years and that a secure home protects and promotes the wellbeing of children, young people and their families.

Key Findings

The available evidence demonstrates that the PRS is changing. While it still represents a housing choice for many who are seeking flexibility or short term accommodation, including young people such as students, it also provides a home for many who are seeking a more stable housing option than the sector currently provides. This is particularly acute for groups who are more vulnerable, such as those with a disability or at risk of homelessness. It is also clear that secure housing is highly valued by the parents/ carers of children and that it can have benefits for educational attainment.

The PRS has more than doubled in size in the past 15 years and covers more than an eighth of all homes in Scotland¹². Two of the fastest-growing groups of tenants since 1999 have been families and people wanting to stay in the sector longer-term. In 2013, nearly a quarter of private rented sector households had children, an estimated 80,000 households compared to 20,000 in 1999. The sector provides a home for nearly one in seven of all households with children¹³.

The proportion of young people renting has also risen substantially and projections indicate that this will increase further, with diverse demand including from vulnerable and lower income young people.

¹⁰ The Scottish Government (2010) A Thematic Review of Literature on the Relationship between Housing, Neighbourhoods and Schools; Available at: http://www.gov.scot/Topics/Built-Environment/Housing/supply-demand/chma/marketcontextmaterials/housingandschools

Scottish Government (2013) Growing Up in Scotland: Birth Cohort 2. Results from the First Year; Available at: http://www.gov.scot/Publications/2013/02/3280/4

¹² Scotland's People Annual Report: Results from the 2013 Scottish Household Survey, August 2014, Scottish Government, Available at: http://www.scotland.gov.uk/Publications/2014/08/7973/3
¹³ Scotland's People Annual Report: Results from the 2013 Scottish Household Survey, August 2014, Scottish Government, Available at: http://www.scotland.gov.uk/Publications/2014/08/7973/3

Some, such as students, will be in the sector through choice and value the flexibility which it provides. However this increase can also partially be attributed to a lack of options due to the growing proportion of young people unable to access home ownership. While data on 16-18 year olds specifically within the PRS is not available, we can demonstrate that the proportion of renters within the 16-34 age group expanded from 13% in 1999 to 39% in 2013 – while owner occupation for this age group has decreased from 53% to 34% over the same period.¹⁴

Many families within the PRS may similarly be seeking longer term accommodation and evidence demonstrates that they are likely to want to remain in the same area. As part of the Growing up in Scotland (GUS) survey, to measure satisfaction with their local neighbourhood, parents were asked how satisfied or dissatisfied they were with the area they lived in. This data was not disaggregated by tenure, but shows that the vast majority (84%) of parents (across all tenures) in Birth cohort 2¹⁵ were satisfied with where they were living. Most parents agreed that they lived in an area that was good for bringing up children (76%) and half (50%) did not want to live in another neighbourhood. 16 GUS also stated that greater numbers of families in rented properties between the birth cohorts suggests that many more are having difficulty getting a mortgage or finding suitable homes at affordable prices. It is therefore reasonable to consider that families do not wish to move regularly if they find a suitable home within the PRS.

Concerns about the stability of housing may be especially acute for parents/ carers in rural areas, particularly those with school age children. Focus group respondents to the first consultation often noted this concern, which was largely due to the idea that the loss of accommodation could easily result in the need to change schools or child care arrangements due to a the lack of other available tenancies. Indeed insecure housing arrangements can have a demonstrably negative effect on children. A Scottish Government evidence review found that neighbourhood and housing characteristics, including tenure and conditions, can impact on educational development and outcomes in a number of complex and interrelated ways. Unstable housing, particularly when it arises from moves which are not consciously chosen such as housing problems or instability, result in very negative outcomes for children and young people.¹⁷

¹⁴ Scotland's People Annual Report: Results from the 2013 Scottish Household Survey, August 2014, Scottish Government, Available at: http://www.scotland.gov.uk/Publications/2014/08/7973/3

¹⁵ Growing Up in Scotland is a longitudinal research study tracking the lives of thousands of children and their families from the early years. 'Birth cohort 2' refers to the second group which were studied to track changes.

¹⁶ Scottish Government (2013) Growing Up in Scotland: Birth Cohort 2. Results from the First Year; Available at: http://www.gov.scot/Publications/2013/02/3280/4

¹⁷ The Scottish Government (2010) A Thematic Review of Literature on the Relationship between Housing, Neighbourhoods and Schools; Available at: http://www.gov.scot/Topics/Built-Environment/Housing/supply-demand/chma/marketcontextmaterials/housingandschools

There is also evidence to demonstrate that lone parent households are less likely to be seeking short term accommodation. These proposals would afford lone parent and rural households a significantly increased level of security in their homes. If the landlord does seek repossession under one of the new grounds, they may also benefit from a longer 12 week notice period and therefore additional time in which to find other appropriate housing.

In terms of other particular groups of children who may be more likely to be affected than others by these proposals, we would expect a positive or neutral impact. A partial EQIA was consulted on as part of our *Second Consultation on a New Tenancy for the Private Sector.*¹⁹ A total of 118 respondents commented on the EQIA. A full EQIA has now been undertaken. The Scottish Government found that none of the proposals are discriminatory and that there are no significant issues that will impact negatively upon the various groups. Age of tenants was considered as part of this.

In terms of disability, analysis of the 2011 census shows that 7% of people who are 'limited a lot' by a long-term health problem or disability are within the PRS²⁰. Currently, a landlord can reclaim their property because the fixed term has ended -this is called the 'nofault' ground. Under the current system, a tenant has a right to proportionate modifications, however, analysis of our first consultation highlighted a common view that the potential for a tenancy to be ended for no reason leaves some tenants unable or reluctant to assert their rights because of concerns that their lease will be terminated. Available evidence also suggests that those within the PRS with a disability or limiting long-term illness are, relative to other groups, more likely to be dissatisfied with their home²¹. This may be due to many factors, however we consider it reasonable to suggest that the proposal to remove the no-fault route to repossession may make it easier for those with a disability, or those caring for children with a disability, to request repairs and proportionate modifications to their home without fear of eviction.

Further, if a parent or carer of a disabled child or young person has made adaptations to their home, they may wish to stay here longer term, which the proposals introducing further security of tenure would enable.

At 31 July 2014, there were 15,580 children being looked after by local authorities which is 1.4% of the 0-17 population.²² Local authorities have new Corporate Parenting responsibilities towards these young people, as detailed within the Children and Young

The Scottish Government (2013) Evidence Review of the Private Rented Sector Tenancy Framework in Scotland; Available at: http://www.scotland.gov.uk/Resource/0044/00449746.pdf
 Scottish Government (2015) Second Consultation on a New Tenancy for the Private Sector; Available at: http://www.gov.scot/Publications/2015/03/6142
 The Scottish Government (2015) Analysis of Equality Results from the 2011 Census - Part 2;

The Scottish Government (2015) Analysis of Equality Results from the 2011 Census - Part 2;
 Available at: http://www.gov.scot/Publications/2015/03/8716/5
 The Scottish Government (2009) Private Rented Sector Review; Available at:

http://www.scotland.gov.uk/Topics/Built-Environment/Housing/privaterent/government/prsreview
The Scottish Government (2015) Children's Social Work Statistics Scotland, 2013-14; Available at: http://www.gov.scot/Publications/2015/03/4375

People (Scotland) Act 2014, to provide care leavers with appropriate and sustainable housing in line with the Scottish Government 'Housing Options Protocol for Care Leavers, Guidance for Corporate Parents: Improving housing and accommodation outcomes for Scotland's care leavers' (2013).²³ Increased security of tenure for care leavers within the PRS will support local authorities in delivering these outcomes.

Security of tenure for vulnerable young people is of concern, since younger age groups are over-represented in homelessness figures. For example, 6% of main applicants assessed as homeless or potentially homeless were aged 16 or 17 years old, but this age group makes up only 3% of the adult population.²⁴ We would consider that a more secure home within the PRS may go some way to addressing this. Further, consultation responses from Housing and Homelessness charities such as Crisis and Homeless Action Scotland welcome the commitment to tenancy reform and increased security. 25

Evidence also demonstrates that despite proportionately higher levels of minority ethnic group households within the PRS²⁶, findings illustrate that one in three minority ethnic group tenants experience problems accessing appropriate PRS housing compared to one in five of all tenants²⁷. We would expect this policy to facilitate minority ethnic groups to remain in appropriate homes and communities, allowing children and young people to live and develop in the communities that they, or their parents and carers, wish to.

The available evidence therefore demonstrates that more secure housing has the potential to advance children's rights and wellbeing in Scotland by allowing those in the PRS a stable home in which they can flourish in their chosen community and school. Particularly those who, or whose families, may have found it difficult to access and maintain a secure home and place in the community previously. As this is a completely new policy and a transformational change to the sector there is no existing evidence to demonstrate the likelihood of the impact, however the positive effects would potentially be significant.

Conclusions and Recommendations

The Scottish Government has found that none of the proposals impinge upon articles on the UNCRC or the indicators of wellbeing (SHANARRI) and that there are no issues that will impact negatively upon children and young people in the PRS.

²³ Scottish Government (2013) Housing Options Protocol for Care Leavers, Guidance for Corporate Parents: Improving housing and accommodation outcomes for Scotland's care leavers; Available at: http://www.gov.scot/Publications/2013/10/6147

24 Scottish Government (2015) Scottish Government Equality Outcomes: Age Evidence Review;

Available at: http://www.gov.scot/Publications/2013/04/8508/6

²⁵ Scottish Government (2015) Second Consultation on a New Tenancy for the Private Sector - Nonconfidential responses: Available at: http://www.gov.scot/Publications/2015/06/4125/0

²⁶ The Scottish Government (2013) Evidence Review of the Private Rented Sector Tenancy Framework in Scotland; Available at: http://www.scotland.gov.uk/Resource/0044/00449746.pdf ²⁷ The Scottish Government (2009) Private Rented Sector Review; Available at: http://www.scotland.gov.uk/Topics/Built-Environment/Housing/privaterent/government/prsreview

We would consider that any impact would be positive or neutral and would have an effect upon all children and young people within the PRS. This is because the proposals not only comply with the UNCRC requirements but have the potential to advance the realisation of children's rights and wellbeing in Scotland. Particularly those who, or whose families, may have found it difficult to access and maintain a secure home and place in the community previously. As this is a transformational change there is no existing evidence to demonstrate the likelihood of the impact, however the positive effects would potentially be significant.

The CRWIA, along with consultation analysis and on-going discussions with key stakeholders, demonstrated that no changes to policy were required in order to achieve the best outcome for children and young people.

We recognise that the data available does not allow a complete picture of the experiences and views of children and young people within the PRS. However the CRWIA has allowed the opportunity to consider their needs fully, and we will continue to do so as the Bill moves forward.

Monitoring and review

Responsible official: Jen Gracie

Timetable: Throughout the drafting and parliamentary journey of the Bill and continuing throughout consideration of any secondary legislation.

Methodology: Through increased engagement with stakeholders that represent children and young people and continuing engagement with key third sector stakeholders.

Bill - Clause	Aims of measure	Likely to impact on	Compliance with UNCRC requirements	Contribution to SHANARRI wellbeing indicators
The introduction	To increase	All those within	The policy does	The policy does
of a statutory,	security of	the PRS.	not impinge on	not impinge on
open-ended	tenure for	Evidence	any of the	any of the
tenancy for all	tenants and	demonstrates	UNCRC articles.	indicators.
future PRS lets.	provide	that it may be		
	safeguards for	particularly	We would	We would
	landlords,	relevant for	consider that it	consider that it
	lenders and	more vulnerable	advances:	advances:
	investors.	children, young		
		people and their	Article 6 (2) The	Achieving;
		families or those	right to life;	Included;
		with protected	Article 23 (1)	Nurtured.
		characteristics.	The rights of a	
		It also helps	disabled child;	Evidence
		local authorities	Article 27 (1-3)	demonstrates a
		to fulfil their	Adequate	strong link
		corporate	standard of	between stable
		parenting duties.	living;	housing and

			Article 28 (1e) Right to education; Article 30 Culture and community; Article 31 (2) Leisure and play. Tenants will be able to assert their rights without fear of eviction, for example when requesting proportionate modifications for disabilities. There is evidence to demonstrate that insecure housing has a negative impact on educational attainment. Security of tenure should also impact upon a child's development and immersion in their community.	educational attainment. Further, findings show that the policy may have a greater effect on vulnerable children, young people and their families. Security of tenure should help them to overcome inequalities in the ways in which they live and learn.
Landlords will no longer have the ability to regain possession of their property simply because the tenancy has come to its natural end (otherwise known as the 'no-fault' ground).	Increase security of tenure and allow tenants to assert their rights without fear of eviction. This is the central policy to the introduction of the new tenancy system, therefore the impact and effects are the same.	As above.	As above.	As above.
12 weeks' notice from landlord to tenant for	Allow tenants who are given notice adequate	All those within the PRS. Evidence	This does not impinge on any of the UNCRC	The policy does not impinge on any of the

tenancies over 6	time to find	domonatratas	articles.	indicators.
months.	suitable	demonstrates that it may be	articles.	indicators.
monds.	accommodation.	particularly	We would	We would
		relevant for	consider that it	consider that it
		families in rural	advances:	advances:
		areas, or those		Achieving;
		who have	Article 6 (2) The	Included;
		particular	right to life;	Nurtured.
		housing needs.	Article 23 (1)	0 (" :
			The rights of a	Sufficient time to
			disabled child; Article 27 (1-3)	access suitable housing
			Adequate	facilitates
			standard of	children and
			living;	young people
			Article 28 (1e)	having a stable
			Right to	community and
			education;	school life,
			Article 30	allowing them to
			Culture and community;	develop their skills,
			Article 31 (2)	confidence and
			Leisure and	self-esteem at
			play.	home, at school
				and in the
			The longer	community.
			notice period	
			provides sufficient time to	
			find	
			accommodation	
			that allows a	
			family/ young	
			person an	
			adequate standard of	
			living. It should	
			also allow	
			tenants the	
			possibility of	
			securing a	
			property that	
			allows a child to stay within their	
			school and	
			community.	
Rents can only	Rent	All those within	This does not	The policy does
be reviewed	predictability	the PRS.	impinge on any	not impinge on
once in a 12	and protection		of the UNCRC	any of the
month period	from rent hikes		articles.	indicators.
(with 12 weeks' advance notice).	which may be used by		We would	We would
Tenants will also	unscrupulous		consider that it	consider that it
be able to refer	landlords to		advances:	advances:
perceived	remove tenants		Article 6 (2) The	Achieving;

unreasonable	from their	ri	ight to life;	Included;
rent increases	homes.		Article 23 (1)	Nurtured.
for adjudication.		T	The rights of a	
Ministers will		d	disabled child;	
have the power		A	Article 27 (1-3)	Policies on rent
to limit the levels		A	Adequate `	predictability
of rent increases		S	standard of	and regulation
for sitting		liv	iving;	will allow
tenants in local		A	Article 28 (1e)	tenants to plan
Rent Pressure		R	Right to	their finances
Zones.		е	education;	and protect
		A	Article 30	them from
		_	Culture and	undue rent
			community;	hikes. This
			Article 31 (2)	should allow
			_eisure and	them to manage
		p	olay.	their finances in
		_		order to remain
			Policies on rent	in appropriate
		•	oredictability	housing.
			and regulation	
			will allow	
			enants to plan	
			heir finances	
			and protect hem from	
		_ ·	undue rent	
			nikes. This	
			should allow	
			hem to manage	
			heir finances in	
			order to remain	
			n appropriate	
			nousing.	
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