1. Introduction

1.1 We acknowledge the committee has set its own objectives and would wish to make the following comments in relation to our progress in meeting our commitment to the homelessness 2012 target to remove the priority need test and ensure that all unintentionally homeless households have the right to settled accommodation.

2. Background

2.1 Glasgow City Council (GCC) receives the largest number of homeless applications per year in Scotland, disproportionate to the size of the population. Scottish Government HL1 statistics confirm that the city received 19% of the overall number of homelessness applications for Scotland in 2010/11, compared to a national population share of 11%.

As a stock transfer authority the council is wholly reliant on the Registered Social Landlords (RSL’s) within the city in order to discharge its duty to homelessness households who it owes a duty to provide an offer of settled accommodation by virtue to the Homelessness (Scotland) Act 1987.

3. Current Position

3.1 The 2012 commitment is an ambitious target which Glasgow City Council continues to be committed to achieving. The Homelessness Task Force report and the subsequent legislative and practice changes which it helped to bring about have led to significant improvements to how we work to prevent homelessness where possible and alleviate its worst effects.

The council is adopting an incremental approach to the removal of the priority need test. In July 2010 the council’s executive committee gave approval for the amendment of the council’s homelessness policy. The policy revision involves an incremental change to the age parameter where homeless applicants are accepted as being in priority need from September 2010 to October 2012. These are:

- From 1 September 2010 applicants who have been assessed as homeless aged 45 and over will be considered to have a priority need.
- From 1 January 2011 applicants who have been assessed as homeless aged 40 and over will be considered to have a priority need.
- From 1 April 2011 applicants who have been assessed as homeless who are under 21 and 35 and over will be considered to have a priority need.
- From 1 October 2011 applicants who have been assessed as homeless who are 30 and over will be considered to have a priority need.
- From 1 April 2012 applicants who have been assessed as homeless who are 25 and over will be considered to have a priority need.
- From 1 October 2012 all applicants who have been assessed as homeless will be deemed to have a priority need.
4. The council is making progress in meeting the 2012 target with each implementation date having been met

4.1 To date the council has been able to achieve each of the target implementation dates. This has resulted in the council now giving a positive decision to 96% of all those who are assessed as being homeless.

The incremental change to the age parameters where homeless applications are accepted as being in priority need has led to the council owing a full duty to an additional 340 households. This is in line with original projections which were carried out when the policy was developed.

Going forward as at the 30th October 2011 it was anticipated that we are likely to give priority need status to an additional 410 applicants as we complete our planned incremental extension to priority need.

However, it is critically important to acknowledge that the financial pressures facing local authorities and the welfare reform agenda have placed significant additional barriers to successful implementation of the 2012 target and undermined the significant progress made in supporting vulnerable households.

5. The impact of the commitment on homeless people, local authorities and registered social landlords

5.1 Clearly the extension of priority need has been beneficial to those homelessness households who would otherwise not have had access to permanent housing, by virtue of Homelessness (Scotland) Act 1987 as amended, prior to our policy revisions.

The increase in the numbers of applicants given priority need status will lead to continued pressure on the council to secure an increased level of permanent tenancies from RSL’s in the city. This in-turn places a burden on the council in relation to the supply of emergency and temporary accommodation for homeless households.

6. Persistent barriers to implementation

6.1 There has been significant investment in social rented housing in the city, and the overall quality of accommodation on offer has been greatly improved, through demolition and new build programmes. These are welcome developments, as better housing contributes to tenancy sustainment. There is a need to ensure that the pace of the agreed development programmed is maintained, and that development funding levels are reinstated to enable delivery of the 10,000 new Housing Association units promised to tenants at stock transfer.

6.2 The council has a significant backlog of cases which have been awaiting permanent accommodation. In order to clear this backlog allocation of permanent tenancies by RSL’s through the Section 5 of the Housing (Scotland) Act 2001 will need to exceed the number of new cases each year in order to clear this backlog and free up temporary accommodation. Since stock transfer, the council has been dependent upon provision of allocations of permanent accommodation from Glasgow Housing Association (GHA) and other RSL’s, from turnover of existing stock, or allocations
from new build. It is understood that this presents challenges for social landlords due to the competing pressures upon the city’s social housing stock. However, it is important to bear in mind that homeless households are among the most vulnerable housing applicants by virtue of being without settled accommodation.

6.3 Going forward it is essential that, in partnership with housing associations, a greater number of lets are secured within the city for homeless households, in both existing and new build stock as well as activity to reduce the actual level of homelessness within the city through prevention and tenancy sustainment activity.

In addition it is crucial that any barrier to households taking up offers of permanent accommodation are removed including requirements by landlords for upfront payments of rent prior to being allowed to take up the tenancy.

6.4 The Westminster Government’s welfare reform agenda is placing significant pressure upon the council’s ability to respond to the needs of vulnerable households at risk and affected by homelessness. Whilst the exact consequences of the welfare reform agenda are uncertain, it is clear that the implications for vulnerable households will be significant. This in turn is likely to increase the level of homeless presentations which will compound the challenges placed upon the city at a time of reducing resources.

In response to changes in Housing Benefit (HB) funding by the Department of Works and Pensions (DWP), in 2011/12 the council had to identify significant savings from within its homelessness services budget. This has placed a significant pressure upon the service and has led to staffing reductions. The City Council has, in 2010/11 through redirection of resources supported our homelessness services in managing this impact, but it is not in a position to fund the gap on an ongoing basis.

6.5 The Council is also dependent upon social, voluntary and private sector providers for provision of property for supported accommodation and other services, and restriction of rent to Local Housing Allowance (LHA) will particularly affect vulnerable clients. Availability of allocations of permanent accommodation may also be impacted, as existing tenants who are dependent upon HB, and are under occupying their current property, may seek to move to smaller properties as allowances are reduced.

The DWP has published further proposals to change the approach to housing benefit funding, including significant changes to arrangements for supported accommodation and temporary accommodation. These changes, if implemented, will have significant implications for individual clients, as well as the provision of funding to the Council for delivery of some services. This in turn will undermine our capacity to support vulnerable households within their own tenancies through the housing support services and will also undermine the viability of our supported accommodation services for our most vulnerable services users which support them to move towards independent living within their own tenancy.

6.6 The proposals to include LHA / HB within the universal credit are likely to lead to increased rent arrears and homelessness due to vulnerable tenants building up rent arrears when unexpected costs and crises force them to use money set against rent
for other purposes. Private landlords may increasingly be reluctant to accommodate recipients of universal credit due to a perception that they are more likely to develop rent arrears.

6.7 Other reforms to LHA are likely to undermine our ability to make greater use of the Private Rented Sector as LHA levels reduce making significant parts of the sector unaffordable.

7. Joint working and developing best practice and opportunities for sharing best practice

7.1 The council is of the opinion that strong partnerships across the public sector is the basis of providing services to vulnerable tenants and people affected by homelessness. Therefore we will continue to build strong partnership arrangements with colleagues within the housing association movement, NHS Greater Glasgow and Clyde (NHSGGC) and the voluntary sector to ensure that we prevent homelessness where possible and respond effectively to ensure that people receive the services they require when they need them.

7.2 As a stock transfer authority the council is reliant on the cities’ 67 registered social landlords to provide a sufficient level of housing to meet our obligations under homeless legislation. Section 5 of the Homelessness (Scotland) Act 2001 sets the legal framework.

7.3 The Homelessness Duty Protocol Working Group has representatives from across the council and housing association movement. The working group is currently reviewing the Homelessness Duty protocol in order to strengthen joint working, information exchange and homelessness prevention activity and tenancy sustainment levels. The council and its partners are working positively to ensure that we are able to meet the needs of vulnerable tenants and people affected by homelessness.

7.4 In order to make greater use of the private rented sector, and extend choice available to service users, Homelessness Services have received Committee approval to engage in an open tender for a Private Sector Leasing Scheme.

8. To determine effective homelessness prevention activity

8.1 The introduction of Section 11 of the Housing (Scotland) Act 2003 has allowed Glasgow City Council and partners within NHSGGC and the voluntary sector to better target advice and assistance to those at risk of losing their home due to repossession activity on the part of lenders and landlords. The council also publishes detailed data on our website in order to highlight the level of sector 11 notifications that we receive. Publication of the data allows interested parties to review court activity of every RSL, High Street and non High Street Lender operating in the city. Currently, to our knowledge, we are the only local authority to do so.

8.2 The Housing Options approach with its focus on increased joint working, early intervention and improved access to advice and information offers potential significant improvements for service.
It also represents a fundamental re-orientation of resources away from traditional homelessness assessment / case working towards housing options interviews and prevention activity.

The Housing Options approach implemented in other Local Authorities has seen the development of new services or partnerships aimed at providing increased options focused on resolving an applicant’s homelessness/potential homelessness without recourse to statutory provision. There is an increased focus upon: mediation services for young people and their families; money and debt advice referrals; and the importance of Common Housing Registers.

Glasgow City Council is currently working with Glasgow Housing Association and other partners to develop a Housing Options pilot within an agreed area of the city. The pilot will involve the co-location of Glasgow City Council homelessness staff and GHA housing staff alongside other key agencies. The pilot will allow us to test out the model and measure its impact on outcomes for service users.

9. **To identify action that could be taken to assist local authorities in meeting the target**

9.1 Support from the Scottish Housing Regulator would be welcomed in ensuring that all RSL’s across the city play their part in offering allocations through the Section 5 process.

9.2 Difficulties in accessing appropriate housing for homeless people with disabilities represent a significant blockage in moving vulnerable people out of temporary accommodation into settled housing. Severe cuts in the budget for housing adaptations and equipment will undermine the Council’s ability to access suitable housing for this group, particularly since 70% of accommodation in the city is flatted.

9.3 The council acknowledges the significant financial challenges facing the public sector and the need to make substantial savings in order to respond to these pressures. Glasgow has made progress in improving our working practices in order to generate efficiencies. However, it is important that the Scottish Government acknowledges the considerable contribution that the council makes in delivering services to vulnerable households and the particular challenges faced by Glasgow in meeting the needs of homeless households and ensures a fair revenue support grant level to reflect the needs of our citizens.

The council is committed to increasing the use of the Private Rented Sector in order to increase the supply of accommodation for homeless households. In order to drive up standards in the private rented sector and protect vulnerable households, Glasgow City Council has consistently argued for the development of a more robust approach to the regulation of the private rented sector in Scotland. At present, there are areas where legislation is weak or missing, or where enforcement action is rendered problematic due to difficulty in gathering evidence or the requirement for tenants to take action themselves or defend decisions in court. The Council is making representation to the Scottish Government for enhancement of existing powers in specific areas where management problems, poor physical conditions and environmental issues are associated with a high number of private rented homes.
Enhanced powers requested by GCC include: Mandatory disclosure checks as part of Private Landlord Registration; powers to carry out inspections of premises; introduction of stated grounds of appeal by a private landlord if their registration is not granted or revoked; third party reporting rights to the Private Rented Housing Panel and mandatory licensing of letting agents.