Introduction

Homeless Action Scotland is the national membership body in Scotland for organisations and individuals tackling homelessness. Our members include voluntary sector providers, Housing Associations, Local Authorities, academics and other professionals involved in homelessness prevention and alleviation.

Homeless Action Scotland (formerly Scottish Council for Single Homeless) is grateful for the opportunity to respond to the bill. Our response is based on information gathered from our members.

Members have confirmed there are mixed views across the country as to how positive the progress has been to date, though everyone is in agreement that the changes are taking us in the right direction and the previous Department of Work & Pensions system had been in need of review in any case. On the whole the updates have brought about better practice, with a more holistic approach being offered to claimants and a broader range of outcomes being offered to support getting the best result available. The advantage of the fund being located with local authorities allows for the claimant to be offered support in relation to the crisis at the time they need it, and in areas of best practice, for a co-ordinated approach to assistance to be offered.

Our overarching recommendation is for the legislation to be concise focusing (as the current Bill does) on general principles, and for the guidance to be broad in scope, allowing for future changes to the economy, welfare systems, and claimant needs, without the need to amend primary legislation. Any or all of these elements will have implications on how the fund is used in the future and the legislation should remain relevant regardless of changes.

THE BILL

Since the devolution of the Scottish Welfare Fund we have seen systems and the general offer to claimants improve. We would like the following small changes implemented to reinforce this:

Recommended Changes

Current:
Section 2, paragraph 1) enabling qualifying individuals to establish or maintain a settled home.

Our recommendation:
Section 2, paragraph 1) enabling qualifying individuals to establish or maintain a settled way of life.
This will allow there to be more flexibility around a claimant’s situation at any given time of need, and take into account that the claimant may not be residing in permanent accommodation at the point of application and may, for example, be moving to interim accommodation rather than a permanent tenancy.

Current:
Section 6, para 3) Before issuing, varying or revoking guidance, the Scottish Ministers must consult
(a) such body representing local authorities as they think fit
(b) such other persons as they consider appropriate

Our recommendation:
Before issuing, varying or revoking guidance, the Scottish Ministers must consult
(a) such body representing local authorities and COSLA, and
(b) such other persons as they consider appropriate, and
(c) any other representative bodies who have a relevant interest in the guidance.

Consultation with additional representative bodies from expert fields such as mental health, addictions, homelessness and housing, will allow any future changes to fully accommodate the broad range of support claimants often assisted by the fund, connect with. Whilst subsection (b) is a ‘catch all’ clause, we believe that representative bodies such as those mentioned above have expert direct knowledge of the fund from the claimants’ viewpoint which should be of equal interest to that of local authorities in considering any change.

THE GUIDANCE

Devolved to Local Authorities

Homeless Action Scotland is pleased the schemes have been devolved to Local Authorities, and that Local Authorities may choose to work jointly. Where procurement for items would be improved upon through larger scale buying, Homeless Action Scotland would suggest Housing Options Hubs be encouraged look at this, and also at any opportunities for improved service provision through joint working.

16 years of age

Homeless Action Scotland is pleased to see clear age eligibility for those of 16 years upwards included in the current guidance, and regards the availability of the Fund to 16 and 17 year olds who are in crisis as extremely important.

3 Claims in a rolling year

Homeless Action Scotland recognises that in most instances the limit of 3 claims in any 12 months would be sufficient, and also prevent the Scottish Welfare Fund being used as a permanent source of funding for individuals. However the nature of crisis is that it is unpredictable and there may well be exceptional circumstances where an individual in crisis may require assistance on more occasions. We would therefore recommend that the maximum of 3 claims in 12 months is not a strict and legal limit,
and for there to be provision for the limit to be breached in exceptional circumstances. Guidance could give illustrations of what might constitute an exceptional circumstance.

**Benefit Listing**

Current guidance includes a list of Welfare Benefits. This is widely misinterpreted as being a definitive list of benefits that a claimant must be in receipt of in order to be eligible for the fund. We would recommend the removal of the list for future guidance, to remove ambiguity.

**Move on from Temporary & Supported Accommodation projects**

Homeless Action Scotland especially welcomed the change within the new scheme that has allowed applications for Community Care Grants to take place without a permanent tenancy address in place at the point of application. This has been a significant benefit of the new devolved system which enables people in transition from temporary or hostel accommodation to permanent accommodation to have essential white goods or furniture in place from day 1 of their new tenancy. However despite this improvement, there is currently a time frame allocated to this.

Homeless Action Scotland would like to see the removal of the timescale. We recommend that where someone is in receipt of support and applying for a tenancy, that where applicable, they may apply at any suitable time prior to the tenancy being granted. This will allow them to plan for their future and make best use of the fund by having time to select from the range of options open to them and make the best decisions. It is important for people in temporary accommodation to know well in advance of any funds which will be available to them when they move to permanent accommodation. Funds would be released on confirmation of the tenancy.

**Awareness & Internet searches**

There was considerable publicity around the abolition of the previous DWP schemes. As a result we have concerns around the level of public knowledge about the current fund. Feedback from our members showed that many clients believed crisis funding and community care grant equivalents no longer existed. Awareness has generally improved over recent months, but could be improved further. In particular where someone is not in contact with any support agencies, we have concerns regarding how easy it is to know what is available in an emergency.

Local Authority websites and general internet searches do not always result in clear information about what is available in an emergency or crisis. Where information is found, claimants can have difficulty gaining access to the scheme.

To make access to the scheme easier, especially for those who are not able to get access to the internet or who have literacy problems we would recommend:

- there should always be a clearly visible telephone number provided;
- the application form should have both a printable version as well as being able to completed online (not everyone will have the option to print forms) equally, not everyone will be able to fill in forms in any format;
Ideally, there should also be a face-to-face option for applications (important for example for those with certain brain injuries or limited literacy)

Homeless Action Scotland would like the Guidance to include the need for ease of access to the fund as well as a review of publicity about the fund to ensure possible claimants are not in the dark. We would recommend service user input in the review processes.

**Are vouchers a necessary offer?**

If a person is in need of help we believe they should not be further embarrassed or stigmatised by vouchers. We see this as being especially degrading where the claimant lives in smaller areas, and the system is more likely to be known. Not only is stigmatisation an issue, but spending options are likely to be limited which may restrict access to bargains and best use of the fund.

We would prefer there to always be the option of money to be handed out in relation to the Crisis Grant element of the fund. In the case of Community Care Grants, we accept that goods rather than cash may be offered. Where money is being used this should be discussed with the claimant in advance, as in some cases, there may already be large arrears and the claimant will have no access to retrieving the funds. Alternatively, they may end up paying a fee to cash a cheque, where another option could avoid this additional cost.

We understand that where someone has an addiction then the option of giving cash may not appear to be a sensible option, as there is an element of temptation. However, if someone has an addiction and is really intent on spending whatever is available to them, the likelihood is that they will sell the voucher for a lesser amount. Vouchers are therefore not the secure option that they appear to be.

**Comments**

Homeless Action Scotland is happy for all of the above to be publicly available, and to make further clarification or comments where necessary.

Robert Aldridge
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Homeless Action Scotland
28 August 2014