Local Government and Communities Committee

Homelessness

Submission from North Lanarkshire Council

General Introduction

1. North Lanarkshire Council welcomes the opportunity to respond to this inquiry. Local Authorities have the lead role in strategic planning to prevent and respond to homelessness, as well as the operational responsibilities for delivering solutions. Our Local Housing Strategy (LHS) sets out our 5-year plan to 2021 for preventing and addressing homelessness and meeting housing needs.

2. The Council is the fourth largest local authority landlord in Scotland and is committed to preventing and tackling homelessness and exclusion in all its forms. Since the Homelessness Task Force published its report setting out 59 recommendations in 2001, the Council has worked pro-actively to improve outcomes for people affected by homelessness by developing strategies and policies to tackle rough sleeping, multiple exclusion and disadvantage; and by developing new and improved local service responses.

3. During a period of unrelenting cuts to public service funding and rising demands for advice and assistance, the effects of welfare reform on the local population continue to present significant challenges for homelessness services. The introduction of Universal Credit (UC) is already leading to increased income inequalities and this area has yet to experience the impact of the move to UC Full Service. Rent arrears have risen across the social rented sector and many private sector landlords are now reluctant to let to people reliant of benefits due to concerns about revenue. Within households affected by low wages, disability, benefit sanctions and capped benefits, the effects of rising inflation, particularly on the basic essentials, i.e. heating, food and housing costs is taking its toll, with many families struggling to maintain tolerable standards. This economic inequality coupled with severe health inequalities is likely to lead to relationship breakdown and we should therefore not be surprised to note that this continues to be the most cited reason given for homelessness across the country.

4. The life circumstances of many affected by homelessness can be both a cause and contributor to poorer health status. Poverty is often a key contributory factor as well as other issues such as relationship breakdown, domestic abuse, bereavement, and social isolation, deterioration in health, particularly mental health, addictions, life trauma and leaving hospital, prison or care. Local data shows that people experiencing homelessness had double
the rate of hospital admissions overall and almost three times higher rate of multiple admissions with rates of admissions for drugs, alcohol and self-harm much higher.

5. It has been argued that Health and Social Care integration is adding complexity; but it can also open up opportunities to enhance service delivery. It is vital that all relevant services acknowledge their role and accept an equal share of responsibility to address homelessness and the related health and social inequalities.

6. Housing affordability is a key concern for the people of North Lanarkshire and we have recently witnessed growth in the private rented sector where rents are typically higher; but where quality and standards can be disappointing. A feature of local homelessness applications is the increase in affordability problems cited by people wishing to leave the private rented sector, both for affordability issues and for the added security and quality of social housing.

7. The following submission seeks to address the specific questions set by the Committee.

*How do you feel housing options and homelessness prevention is working in practice? Are there examples of good practice?*

- Housing Options can work well in practice where the main focus is on the quality of outcomes and satisfaction by service users. However, there are obvious tensions arising from the views of the Scottish Housing Regulator (SHR), which advocates a firm focus on the rights of people to make a homelessness application and have it recorded on the HL1 return to the Scottish Government. The SHR position is upheld in legislation, now mirrored within the Housing Options Guidance; nevertheless in practice this ensures a continued focus on process rather than on outcomes. In addition, the PREVENT1 statistical return has still to be bedded in and it’s clear there is some confusion both in terms of recording practice and in interpretation of the data.

- Housing Options alone cannot tackle some of the deep rooted forms of exclusion that lead to homelessness in adult life; and earlier prevention activity is required with commitment from all public services, particularly from health, social work and education to challenge some of the structural inequalities that continue to affect our most vulnerable children and adults.

- The delivery of good quality housing options advice and homeless prevention activities can be inconsistent. There are examples of good practice happening, but it can be sporadic dependent on the structure of the service, the commitment of senior managers and the knowledge and skills of the advisor. However, continuing development of the Housing Options Hubs and
the implementation of the Training Toolkit should address these issues and ensure improved and consistent housing options advice services in future.

- Whilst greater consistency is to be recommended, we cannot lose sight of the variances in the local infrastructure and resources. Inevitably this calls for local flexibility in how we respond. The regional Housing Options Hubs are beneficial and influential in progressing change, sharing good practice and developing new solutions to meet housing and support needs.

- Maximising choice and control for applicants to social housing is a positive step; however there also needs to be recognition of limited turnover and type of stock available across the country. We also need to consider how to manage aspirations and expectations when these are not always reflective of available stock in the area concerned. People must be empowered to understand what their choices are and supported to get the most positive outcome they can from those choices.

**How effective is the relationship between all the relevant agencies, including the health sector, and charities working on homelessness prevention?**

- Some aspects of partnership relationships work really well to prevent homelessness and others are less productive and could be improved. The integration of Health and Social Care is adding complexity; but it can also open up opportunities to enhance service delivery. Community Planning relationships are strong in North Lanarkshire and we continue to build our shared ethos and a common focus on priorities.

- The Council has for many years encouraged partnership working through the Homelessness Strategic Partnership, which enables co-production of relevant action plans included within the LHS. Close working relationships are valuable and although they could always be improved, they provide the bedrock for successful joint effort and outcomes. It is notable that statutory duties in respect of homelessness remain limited to local authorities and in practice, housing services.

- **Health:** The local links between health and homelessness have improved with a fresh focus provided by joint data sharing and analysis to better understand the health needs of people affected by homelessness. It could be helpful in future to develop a form of *Health Contribution Statement* within our LHS to compliment the approach used in Health and Social Care Integration. In addition; although a joint action plan has been developed, there have been delays in implementing certain required actions by Health, in part because the new integrated teams are still forming; but also because there’s a lack of opportunity until dis-investment and re-investment priorities are clearer.

- **Justice:** Good relationships at a local level ensures an appropriate level of joint working takes place to meet the needs of people involved in the justice system. However; continuity of homelessness and housing support services
can be disrupted when people are remanded or released at short notice, particularly in the case of short-term sentences. The public policy focus on community justice and reducing reoffending will enable further progress in this area.

- **Third sector**: they have a key role to play and should be involved at every stage including co-production of services. The third sector play a vital role in supporting homeless people in North Lanarkshire through commissioned services and form an integral part of our local partnerships.

**What needs to happen to improve the delivery of housing options and homelessness prevention services and the outcomes achieved for service users?**

- We need to develop services and a broader range of options to better to meet the needs of single people, particularly those under 35 years; and assist in enabling the development of a more innovative approach to meeting housing needs. Sharing in the social rented sector needs to be explored with solutions found for the barriers caused by, e.g. inflexible Council Tax practices; and new tenure options developed to provide protections when things go wrong.

- Explore options for changes to legislation, as introduced in Wales and consider if there would be merit in extending duties to address and prevent homelessness to the Integrated Joint Boards.

- We need to address the increasing focus on process, rather than outcome by the Scottish Housing Regulator and this may also require changes in legislation.

- Re-emphasise that the legal obligation on local authorities extends beyond housing services to bring improvements to service delivery and support for homeless households, particularly for those with complex and enduring needs who may not meet thresholds for access to social care services.

**What role should private sector housing providers play in preventing and responding to homelessness?**

- Private sector providers could be seen as being a key partner and the Council tries to encourage their participation through a Rent Deposit Guarantee Scheme and engagement via regular forum events with the sector.

- The Section 11 procedure already exists as a way of identifying households at risk of losing their accommodation and the pre-action protocol ensures that private landlords have followed a set of actions to help prevent eviction where possible. The planned changes to the tenancy regime due for implementation later this year should provide additional security of tenure to families living in the PRS.
• The provision of housing support to tenants at risk of losing their PRS tenancy could also be part of the prevention agenda with landlords able to make referrals to services for assistance, however this would require additional resources as there is already increasing pressure on existing resources.

Temporary Accommodation

What evidence is there of pressure on temporary accommodation in your area? Has this increased in recent years?

There is significant pressure on temporary accommodation and this does appear to have increased in recent times. The average length of stay has increased and this is due to a number of factors including the availability of suitable permanent accommodation, reluctance to accept offers of housing due to concerns about future affordability, (with particular concerns expressed by young people in insecure employment who may be affected by welfare reforms). There is also no doubt that length of stay in temporary and supported accommodation is affected by increasing level of homeless households who have complex and multiple needs, which are difficult to meet within the existing temporary accommodation stock profile.

• North Lanarkshire Council has already highlighted extreme funding pressures on Temporary Accommodation arising from welfare reforms and this is becoming more acute as the effects of the Benefit Cap and the rollout of UC are being realised.
• The Council has a Temporary Accommodation Strategy, which sets out our need and demand profile and proposals for effective management.

How can homeless people’s experiences of temporary accommodation be improved? For example, how can the use of unsuitable accommodation be reduced or the length of time spent in temporary accommodation reduced?

Unsuitable accommodation has not used in North Lanarkshire since 2006 when we made a conscious decision to stop the use of B&B. However, reducing the length of time people stay in temporary accommodation would require a significant level of partnership working and resources to enable those with multiple and complex needs to be housed in suitable accommodation; but also supported for however long it takes in order to sustain their accommodation.

• We would prefer to see less of an interest in the length of stay in temporary accommodation and more emphasis on person-centred services and on getting the right outcomes for people that achieve sustainable outcomes for homeless people and communities.

• Temporary accommodation is regulated and standards have been continuously improving. The majority of our stock is dispersed family homes, located within our communities, to ensure continued links with social and
support networks. However, this is the type of temporary accommodation that is under threat from welfare reforms and could be difficult to afford for service providers unless reasonable levels of housing subsidy continue to meet the costs.

- The social environment in some forms of temporary accommodation can be problematic, particularly where sharing is a feature; however this council has made continuous improvements to the fabric and conditions within our Specified Accommodation facilities by reducing densities and enhancing risk assessments and support provision.

The Housing First model appears to work well, however the commitment and ongoing resources from all partners is critical to its success. Housing is not in a position to fund the housing support and health and care support costs likely to be necessary in many cases.

**Do you have concerns about the funding of temporary accommodation? If yes, how should temporary accommodation be funded?**

Yes, future funding of temporary accommodation is a significant concern. Although the UK Government have stated that they will disburse funding to cover the costs of supported accommodation above the LHA rate, there is no clarity about how the Scottish Government will supply these funds to local authorities. The most significant concern expressed in the sector is that funding will be disbursed and used to deliver other local authority priorities.

- A variety of welfare changes have severely restricted the ability of councils to fund their temporary accommodation. In particular, the gradual replacement of Housing Benefit support by Universal Credit restricts the ability of councils to cover the additional running costs of management, security, furniture and fittings provision and replacement through tenants’ benefit entitlement. Restrictions on Local Housing allowance have added to pressures as have collection difficulties in areas where the full Universal Credit is rolling out. The shortfall in funding, even after distribution of the £22m homelessness funding to councils following the abolition of the Temporary Accommodation management fee, is estimated to be at least another £30m to £40m and could be even higher. Consideration will have to be given to the staffing and amenity levels that can realistically be provided with such funding constraints.

- While councils will seek to re configure services to better address current needs and reduce funding pressures, many local authorities will struggle to maintain the quantity and quality of services against tight overall budgets. Impact of the LHA cap, particularly on young people is also likely to reduce the range of affordable accommodation and extend lengths of stay in temporary accommodation.

- Consideration should be given to additional funding at least in the short term by Scottish Government to support councils to re configure services.
Permanent Accommodation

How do social landlord’s allocation policies prioritise applications from homeless households and how does choice based lettings work in practice?

- In North Lanarkshire we utilise a Common Housing Register and a common points based allocation policy designed to reflect and prioritise housing needs.
- Local relationships with RSLs are helpful and collegiate both strategically and operationally.

In this LA, homeless households would be listed within the homeless waiting list. As all applicants are homeless, they all have the same high priority for housing and are listed in date order with the oldest case listed at the top of the waiting list. A percentage of voids across all areas are then allocated to each of the waiting lists including the homeless list with the intention of balancing the number of lets across all waiting lists.

This LA does not operate a choice based lettings system.

Multiple and Complex Needs

What more could be done to ensure that the needs of homeless people with multiple and complex needs are adequately supported? Are there examples of good practice?

- Provide and enable a systemic approach using strong local partnerships with a focus on prevention.
- Support the development of Psychologically Informed Environments within health and support services, particularly for people affected by addictions and poor mental health.
- Support the development of assets based approaches to community development and regeneration to improve the community response to people with vulnerabilities.
- Improving outcomes for people involved in the justice system, particularly by reducing re-offending would have a marked effect on homelessness figures.
- Young people affected by trauma and abuse need to have access to mental health and support services at the earliest opportunity.
- Men, women and children affected by domestic abuse need to be able to access services locally that provide the range of support and counselling services they need.
**What scope is there for improved joint working with all agencies and groups supporting those with multiple and complex needs, which would also include the health sector?**

- Joint working at the CPP level and within Joint Integrated Boards should be supported and local authorities should retain the lead role for this work.

- The Health sector’s increased attention to the health inequalities endured by people who are homeless is welcomed and could prevent homelessness and lead to significant improvements in outcomes. However; methods of measuring performance in the NHS, particularly the focus on short term targets needs to be reconsidered with more emphasis placed on evidence of improvements in public health.

- Statutory duties in homelessness only apply to local authorities (in practice, Housing services) this needs to be considered within the context of the Public Bodies legislation.

- Psychologically Informed Environments (PIE) is a relatively new model of service delivery and if implemented jointly by Health, Housing and Social Care has the power to create a range of therapeutic services that begin to tackle the deep rooted disconnections that some people are struggling to manage; and that can lead to homelessness. “Housing First” is more likely to succeed as a model of provision for people affected by chronic homelessness if other services, e.g. Addictions, mental health, conciliation and justice services, worked closely together and took an equal share of responsibility for outcomes.

- However the Housing First model requires significant commitment and ongoing resources from all partners to make it successful and pooled budgets and agreed priorities could assist in achieving this.

- Joint, multi-agency training on the causes and consequences of homelessness assists joint working.

**How can access to general health services, including preventative health services, be improved for homeless people?**

There should be scope for improved joint working to address the needs of those with multiple and complex needs, specifically because of the integrated joint boards. However, the provision of housing and related support services is not mandatory within the joint boards and it is becoming clearer that they perhaps should be. This would ensure a more cohesive approach to the delivery of services to those most in
need and enable preventative measures to be properly and fully considered across all partners.

There needs to be greater recognition amongst all partner agencies that people with multiple and complex needs can have extreme difficulty keeping appointments and that greater flexibility in when appointments are scheduled can make a difference. Additionally, services need to accept that some appointments won’t be kept and that rather than close the service to these people that services need to make more of an effort to stick with people regardless of their behaviour. Open door policies may be the answer; however this may require a different approach to how services are staffed and the way they currently operate.

**What role could the “housing first” model play in improving outcomes for homeless people with multiple and complex needs?**

*See earlier response.*

**Rough Sleeping**

*How has the pattern of rough sleeping changed in your area? For example, is the number of rough sleepers increasing or have the characteristics of rough sleepers changed? What are the reasons for this?*

The number of rough sleepers increased by 87% from 2014/15 (73) to 2015/16 (120). Figures for 2016/17 are not yet available.

The reasons for rough sleeping are varied and include issues around welfare reforms e.g. sanctions, claimant commitment, lack of understanding of online services, etc. as well as an increasing number of evictions due to rent arrears (again some linked with welfare reforms), and an increasing number of people with complex needs who are unable to sustain their accommodation.

**What type of accommodation is offered to rough sleepers?**

- Rough sleepers are offered the same type of accommodation as any other homeless person in this LA including hostel, dispersed or supported and will initially be dependent on availability at the time of presentation. The applicant may later move to alternative accommodation and will likely be linked to the outcome of a housing support assessment.

**What type of approaches can contribute to the reduction of rough sleeping and achievement of sustainable housing solutions for rough sleepers?**
• The development of a fair welfare system that assists and supports vulnerable people is a key element as are the provision of various supports for people with multiple and complex needs. The type of support required may need to last for some considerable time.

• Support for people with no recourse to public funds

Other

*What are the reasons behind why people become homeless?*

Asked to leave and disputes within households remain the overriding reason for homelessness in NL at 56%. 13.5% were as a result of action taken by landlord and 7% domestic abuse. Almost 10% gave up secure accommodation for other reasons. These are the reasons given by applicants when they present as homeless, however there is no additional information provided for those who are asked to leave, although discussions with applicants sometimes point to family relationships as well as underlying poverty and multiple and complex health needs that cause friction in the household and result in the applicant being asked to leave.

*What data is used to measure homelessness numbers in a particular area?*

• Scottish Government statistics derived from the statutory returns. In addition, we utilise data collected at a local level and analysed to inform our local planning and service delivery models, e.g. Locality Profiles, Population and economic statistics etc.

*Can you give examples of best practice of effective strategic coordination of services to ensure there are no gaps or overlaps in homelessness services?*

• The Local Housing Strategy forms the basis of the local authority’s response to homelessness and housing support. Co-production of services and partnership working underpins general service design and delivery.

• The Council facilitates and supports a multi-agency partnership on homelessness to ensure the broadest range of inputs from relevant partners; and commissions and manages several services to meet the particular needs of service users.

*As an example, this authority is part of a partnership to improve transitions for young people leaving care. The partners work with young people in care and put in place a training plan for learning independent living skills. On completion of specific modules, the young person has an opportunity to access a training flat to test out their skills and understand what it really feels like to live on their own. However they have the ability to return to their care placement after a few days or weeks to reflect*
on their experience and work on any elements they have identified as requiring additional work. This assists in building the knowledge, skills and resilience of young people to prepare them for when they finally leave care.

**Are there any problems with people accessing their housing and homelessness rights? If yes, how can access be improved?**

There can sometimes be barriers, and this can be related to the rapport and relationship that needs to be developed between the applicant and advisor. Some homeless people will not disclose certain issues for fear of being judged or that this will impact on the service they receive. For instance, people who have poor mental health or an addiction issue may not advise the officer of this issue and could mean that additional supports are not put in place in order to assist them in maintaining accommodation.

Sometimes the profile of accommodation available (both temporary and permanent) is not suitable for the applicant due to special needs or a disability and results in a significant wait until this becomes available.

**What are the barriers to providing homeless people with sustainable housing solutions and how can these barriers be addressed?**

There are numerous barriers to providing sustainable housing solutions:

- welfare reforms which do not support vulnerable people to sustain accommodation;
- social stock availability of a suitable size and type for the household;
- affordability and security within the PRS;
- households with enduring and complex needs that remain unmet.

Implementing a welfare system that helps people to help themselves would be a positive step with supports in place for people who struggle to navigate their way through.

Development of shared tenancy options across the country will provide assistance to younger people affected by the shared room rate.

It is clear that there needs to be an increase in the affordable housing supply – we’re working closely with local RSLs and the Scottish Government to increase stock.
Are there any other issues relating to homelessness which you wish to bring to the attention of the Committee?

- The importance of political and strategic leadership and of governance is more relevant than ever.