Introduction

SOLACE (Scotland) welcomes the opportunity to respond to the call for views on Homelessness from the Scottish Government’s Local Government and Communities Committee.

There are some contextual points that preface the details of our response.

To a lesser or greater extent, homelessness is a challenge for all of Scotland’s Local Authorities, although it is recognised that there are specific and unique complexities for both urban and rural areas.

Our central observation is that tackling and minimising homelessness is a whole systems issue and not simply a housing challenge. It demands a coordinated approach that eliminates institutional barriers and ensures a holistic person centred approach. There are also significant resource challenges, particularly in the context of ongoing welfare reform.

The leadership and coordination of this response should continue to sit with local government through community planning structures, but with stronger and more locally accountable input from key national or regional stakeholders including Criminal Justice, Scottish Prison Service, NHS and integrated health and social care services.

There needs to be a renewed and concentrated focus on prevention activity. Three of the most common causes of homelessness are relationship/family breakdown, poverty and people with multiple complex needs. Mental health challenges and addiction are key factors in this. Early intervention and a shared and determined focus across all public agencies, that recognises the central role that stable and suitable housing plays in education, criminal justice, health and employment, is essential.

Generally housing supply and tenancy types need to reflect the actual needs of people with complex multiple needs and a one size tenancy is not suitable in many cases. Local flexibility of accommodation type and tenancy provision should be promoted to ensure person centred sustainable housing and homelessness solutions.

Questions posed by the Committee

Housing Options and Homelessness Prevention

*How do you feel housing options and homelessness prevention is working in practice? Are there examples of good practice?*
Housing Options works well in practice although more needs to be done to accelerate its development across Scotland. The COSLA and Scottish Government Joint Housing Options Guidance and Training Toolkit is a valuable resource.

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

- Homelessness needs to feature visibly and explicitly in community planning across Scotland.
- It is noted that statutory homelessness duties remain limited to local authorities. To ensure better joint working and prioritisation, consideration should be given to widening this duty to key public bodies including health and justice.

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

- Tailor services better to young single people (among whom there has been an increase in homelessness). This may also require a more innovative approach to physical make-up of accommodation (e.g. sharing) and possible support for IT solutions to find ‘flatmates’. Particular attention should be given to long term homeless prevention for young people who were previously looked after or accommodated by local authorities.
- Stronger protocols and referral mechanisms are needed between local authorities and Scottish Prison Service. Prisoners are high risk to be homeless on release. This is especially true for short term prisoners and on-remand prisoners who then are more likely to engage in re-offending behaviours. There are a range of initiatives needed to ensure suitable accommodation, advice and tenancy support that maximises the changes of tenancy sustainment and consequent rehabilitation of offenders. These initiatives should begin in prison. East Ayrshire Council and West Dunbartonshire Council and a number of neighbouring authorities are working in collaboration with SPS to develop streamlined processes for prisoner release that minimises the likelihood of homelessness, and these activities can be further developed and shared across Scotland.
- Health and Social Care Partnerships are ideally placed to provide a focus on the role of mental health and addiction services and new innovative approaches to community based joint working between mental health services, local authorities and other partners need to be encouraged.
- There should be a central and coordinated focus across Scotland on effective responses to people, particularly women, fleeing domestic violence. There is an increased need for preventative education and development work with victims and perpetrators, and with young people. There should be greater focus on allocations policies that protect women and children, and stronger use of criminal justice measures including CRASBOs and the use of the Matrimonial Homes (Scotland) Act so that social landlords can act swiftly and decisively against perpetrators of domestic abuse.
**What role should private sector housing providers play in preventing and responding to homelessness?**

- Private sector housing providers play a key role in provision across Scotland. Greater control of accommodation standards and landlord behaviours can ensure that this sector plays a stronger role in supporting local authorities to prevent and address homelessness. This challenge is increased as a consequence.
- Need to address the effect of the current DWP changes on the reluctance of private provision both because of the delays and caps on rents. Their role in making people homeless, substandard quality of housing?

**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?**

- Adequate housing supply is essential to tackling the length of time spent in temporary accommodation. However in addition to the duration, it is important to ensure a person centred outcomes-focused approach to moving people into suitable, stable accommodation. A fundamental element of this is ensuring that the tenant is prepared and supported to accept a long term tenancy and this requires a multi-agency early intervention approach.

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

- 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 and furniture and fitting 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 is conservatively estimated to be at least £20m in Scotland.
- 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. Impacts of the LHA cap, particularly on young people, are also likely to reduce the range of affordable accommodation and potentially extend lengths of stay in temporary accommodation.

**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 is best done at a local, CPP level and local authorities are best placed to lead this work as a democratically elected sphere of government and as lead CP partner (etc.).
• Health sector’s increased attention on housing is welcome. Access to health services is key. GP surgeries need to be more consistently accessible to people experiencing homelessness and rooflessness. This is particularly the case for people with mental health issues.

• As set out above, statutory duties in homelessness only apply to local authorities. Extending this to key community planning agencies such as HNS and criminal justice will accelerate and strengthen joint working, and further clarity on the statutory role of Integrated Joint Boards would be helpful. In addition, a greater contribution is required from the private rented sector.

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?*

• Much of the evidence on rough sleepers is anecdotal but deeply concerning, for example the high numbers of deaths amongst homeless people in Glasgow. Further work is needed to clarify the definition of rough sleeping and to develop robust evidence based responses. In addition it is important not to confuse rough sleeping with street begging. Both are separate issues with separate solutions. Rough sleeping is more an issue in cities particularly Glasgow and Edinburgh. There is a need for greater more understanding on the local nature of this as well as national factors.

• There is a specific issue for asylum seekers whose claims have failed and have no recourse to public funds. In almost all cases of rough sleeping, very vulnerable people are exposed to considerable risk.

• Street based services run by the third sector are often best equipped to provide an initial response, but these services experience significant resource challenges.