Introduction

East Lothian Council welcomes the opportunity to comment on and provide evidence on the current position in relation to homelessness and the ongoing pressures we are dealing with.

The ongoing commitment to addressing the supply issue at both a national and local level is welcomed but given the current pressures in relation to temporary accommodation and other issues it is clear that this is a long term provision and that in the immediate future the issues leading to this call for evidence will continue.

This response deals with the Housing Options in more detail throughout. However it is appropriate to note that the growth and success of Housing Options processes as a means to prevent homelessness as we moved towards the 2012 legislative changes, has led to a number of positive outcomes across Scotland.

The basis for this success being the establishment of “Options” services in a manner which protects the client’s rights but which also reflects the local housing environment in which the authority has to operate.

The lack of any statutory provision for housing options does however lead to a potential conflict between what is inherently a voluntary housing access management approach, and the clear rights an individual has in relation to homelessness.

In many ways this has led difficulties in ensuring “options” continues to operate effectively not least as a result of the different approaches being pursued by some third sector advice agencies, who choose to operate purely on the “rights based” model even though in some cases this can be counterproductive in preventing or dealing with homelessness.

Unfortunately the view of the Scottish Housing Regulator appears to follow a similar “one size fits all” process which fails to recognise the need for dynamic local services which reflect the local housing environment and are geared to delivering homeless prevention and response services.

Before dealing with the specific points requested the Council would also suggest the following in relation to setting out the context in which we are operating.

1. Political leadership and accountability.

It is vital at a local level that there is visible commitment and that appropriate resources are made available to allow councils to meet their homeless and prevention and response requirements.
The council welcomes the commitment of Scottish Government to addressing homelessness particularly via the operation of the Homelessness Prevention Strategy Group.

2. A joined-up, multi-agency approach.

The Codes of Guidance stress that homelessness is a corporate issue, and there are many excellent examples of different services working well to deal with specific clients groups. However the lack of duties to assist in addressing homelessness and homeless prevention services especially within the integrated authorities can be problematic and it would be beneficial for such services to have a duty to assist in this area of work.

Such a duty would ensure that services will be locally planned led by the council and partners to reflect local needs and circumstances but also to ensure the contribution of a wider set of public bodies in delivering effective services.

A growing need for joined up working also exists with UK government and particularly the Department of Work and Pensions with regard to welfare reform.

3. The continued focus on prevention.

This is to some extent linked to the above comment on partnership working as homeless prevention remains the most effective response to those client threatened with homelessness and especially in relation dealing with those with complex needs, i.e. those least able to manage the existing homeless processes, and for whom often housing in itself will not provide an effective solution to their problems.

4. “People” based outcomes.

The key issue in relation to homeless prevention, housing options and homeless service provision is to deliver services to people to either prevent homelessness occurring or to ensure homelessness is dealt with quickly, effectively and in a manner which can assist in ensuring that future homelessness does not occur.

The current Homelessness Statistics provide a valuable tool in respect of demand and provide some limited outcome information, but they do not in themselves fully reflect the local environment in which services are being delivered. More effective qualitative as well as quantitative indicators are required to ensure accountability and transparency of service provision.

These points underpin our views and inform the answers to the specific questions posed in the call for evidence.

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 but there are issues with it not marrying up with the legislation and the gathering of statistics.

It is important that we establish a statutory basis for housing options but also that it is recognised that main value in the approach is the link to the local housing environment and the flexibility in responding positively to the ways homelessness occurs in any given area, and the resources that exist to prevent or react to it.

We have, as many authorities have, shared approaches and information with other councils and learned from their experiences. The Housing Hubs have played a positive role in developing this coordinated approach.

The development of the Housing Options Training Toolkit will produce a valuable resource to ensure a quality of response to clients by ensuring staff are fully trained to deliver the entirety of housing options holistically.

The council recognises the support of other councils and the Scottish Government to this improved training of front line staff and the prospects for an effective training tool kit are innovative and will improve services to clients.

It is unfortunate that existing training providers failed to address these requirements and that as a result Councils have effectively been forced to develop the training themselves. However the major positive from this is that the final product will be developed by housing providers who are the leaders in, and have the most experience in delivering these services.

East Lothian Council introduced its homeless prevention service around 12 years ago and it’s Housing Options Service in 2010.

The key to success in this approach has been an awareness of the local housing environment, a commitment to preventing homelessness, and the ensuing that complementary services exist such as family mediation; financial advice services etc exist to assist clients and prevent homelessness.

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

These relationships are vital but could always be improved. An important factor in East Lothian has been ensuring partnership working at strategic level via our Community Planning arrangements.

- **Health:** The recent work reviewing the impact of homelessness on health is noted and welcomed, but it’s vital that the integrated authorities see homelessness as a significant issue to which they can contribute rather than simply seeing housing services as an accommodation resource.
- **Justice:** This is a significant issue which we hope will be more effectively addressed as a result of the Community Justice plan. As with the health
issues it is extremely important that we ensure a full resourced partnership to promote accommodation sustainment and prevent future homelessness and not justice agencies seeing homelessness as simply being an accommodation route.

- **Third sector.** Agencies have a key role to play but there is a need to ensure that the housing options culture is embedded in all agencies and that pragmatic and effective local solution are established to promote options and homeless prevention.

- **Private rented sector.** Landlords have previously been well engaged in homeless prevention principally via rent deposit schemes etc, but the impact Universal Credit, especially the full service in East Lothian has seen landlords moving out of the market for our clients.

- **RSL’s.** We have an very positive relationship with RSL’s active in East Lothian with 50% of their general needs allocations being committed assisting with housing homeless clients, all of the major RSL’s contributing to our temporary accommodation pool and close working relationships with our prevention services.

These relationships are key to our existing services and we are well placed to build on these positive relationships and further develop housing options services.

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

The above comments regarding all party engagement and commitment to homeless prevention and housing options are vital if we are to continue to deliver outcomes for clients which prevent homelessness, and react effectively to homelessness when it occurs and which address “special “needs within this client base.

East Lothian has seen a levelling off of demand from younger clients, and we can evidence very good tenancy sustainment outcomes for those that have accessed our services.

The issue ultimately returns to resources, but pragmatic and effective use of new accommodation models such as mid-market rental, shared flats etc especially for single people can be instrumental in preventing homelessness or at least providing an alternative to the public sector secure tenancy outcome which is increasingly difficult to deliver. That public sector tenancy outcome presently means increasingly lengthy times for clients in temporary accommodation and the tying up of temporary accommodation for longer than anyone is comfortable with.

In East Lothian the waiting time for a single person is generally about twice that of a person requiring family sized housing, with the associated “clogging” up of temporary accommodation which brings its own challenges especially in creating resources to deal with those with complex or multiple needs.
What role should private sector housing providers play in preventing and responding to homelessness?

Our experience in the last decade is that especially in relation to prevention/options good private sector provision can be very useful for a range of clients. We have until the last 18 month or so made extensive use of the rent deposit process but the rolling out of welfare reform and especially the full digital UC service has seen this contribution significantly reduced.

The experience in East Lothian has been that generally that the private rented sector remains at its existing level but concerns from landlords about the UC process, principally the payment of rental direct to the tenant, has meant that landlords seem to be actively seeking not to let to those in receipt of benefit

Temporary Accommodation

The recent past has seen a significant increase in the pressures for temporally accommodation provision, in all formats.

East Lothian has historically been reliant on B and B accommodation especially for single people given the relatively limited proportion of smaller properties in all sectors East Lothian. However by 2012/13 we had made positive impacts into that use especially by families and we had reduced the use of B and B for families with children to outright “overnight” emergencies

However in the recent past our reliance on B and B has approached pre 12/13 levels and of most concern is the increased use of that form of accommodation for families with children.

This has occurred despite an increase of around 40% in temporary accommodation provision through a combination of measures, taking stock from the RSL and council letting pools, open market acquisitions and increased use of private sector properties.

The additional financial problems in relation to the current situation are increased spend on B and B and the managerial impacts of UC on the temporary accommodation pool with an increase in arrears. This had led to additional staff resources being deployed to address arrears management issues rather than the assisting clients to successfully move on from temporary accommodation.

These financial issues fall on the Council’s General Services budget, which in turn impact on other much needed services including those we seek to engage to deal with more complex cases. Therefore it is not a purely “housing” based issue

The recent government announcement in terms of financial mitigation has been welcomed and will assist with managing the pressures we face.
Permanent Accommodation

Each authority is best placed to deliver on its overall housing responsibilities as they are best placed not only in terms of awareness of their local housing environment but also in coordinating the response of other housing providers (generally RSL’s).

East Lothian operates a group plus point’s allocations policy within which homeless families are housed within the General Needs grouping which at present accounts for 70% of all allocation. The proportion of homeless allocations has generally been between 41 and 46% of allocations, which have consistently been above the national average.

The council is presently reviewing its allocations policy to help address the pressures being experienced.

However it is clear that we will in order to further reduce time spent by clients in temporary accommodation have to significantly increase this proportion of lets to homeless clients.

This obviously places pressure on authorities in respect of other legal re-housing requirements such as those with medical needs etc, and also potentially reinforces a culture of homelessness being seen as the prime means of achieving public sector housing. That in itself could further undermine prevention and options services, and increase the demand on homeless response services and the provision of temporary accommodation which accompanies these responsibilities.

All RSL’s in East Lothian operate on the same nominations basis that of 50% of voids being allocated to homeless priorities either by direct nomination or by the operation of choice based allocations systems. In practice this process leads to RSL’s committing around 40% of their supply given the relatively high proportion of amenity or sheltered properties in the RSL stock and the relative low homeless demand for such house types.

Multiple and Complex Needs

The experience in East Lothian in relation to in relation to services for care leavers, those with mental health needs and young single homeless clients has been positive.

Our services where possible work on a prevention based approach of delivering services and in some circumstances delivering services whilst assisting with the sustainment of existing accommodation, to prevent homelessness occurring.

However in terms of those with complex or multiple needs, I would reiterate the comments about the requirement to ensure that agencies and services positively engage with the housing service to provide support to complement tenancy sustainment or accommodation provided.
Rough Sleeping

This is not an area of work where historically East Lothian has faced significant issues, especially with regard to “street homelessness”. However linked to the previous comments about the importance of local based we recognise of course the pressures this issue provides in other areas, principally city environments and would welcome any action to more accurately quantify and deal with the issue.

Other

In conclusion East Lothian has made significant progress in the past 10 years in relation to Homeless Prevention and Housing Options services to assist with reducing the demand for re-active homeless services, whilst ensuring that clients rights are protected.

However the impact of Universal Credit, the relative decline in the use of the private sector, and increasing demand for homeless services may begin to dissipate the progress we have made.

In relation to complex or multiple need cases, the effective solution is very often not purely accommodation or housing based but requires a resource input from other services often those under the greatest strain in relation to their wider service responsibilities, and budgets.

If Homeless Prevention and Housing Options are to continue to provide a positive impact on housing services and thereby create the resources to allow homeless services to develop further then a number of factors have to exist

1. Political leadership and accountability.

2. A joined-up, multi-agency approach.

3. The continued focus and commitment to homeless prevention.

4. “People” based outcomes.