Local Government and Communities Committee

Inquiry into Homelessness: Summary of written evidence

Introduction

This paper provides a summary of the evidence received to the Local Government and Communities Committee’s call for evidence on homelessness. Sixty four responses were returned. These responses are available on the Committee’s webpages.

The Committee asked 21 questions in their call for views. This summary provides an overview of the main themes arising from the evidence. It gives examples of organisations providing certain views and good practice examples, but this should not be taken as a comprehensive list of all those responding to a particular question.

The summary is structured according to the questions asked in the Committee’s call for evidence. Not all respondents followed the structure of the questions posed by the Committee. Those comments have been added to the most appropriate question. In some cases, the summary combines responses to a number of questions given the overlapping nature of responses.

Summary of Evidence

1. How do you feel housing options and homelessness prevention is working in practice? Are there examples of good practice?
2. How effective is the relationship between all the relevant agencies, including the health sector, and charities working on homelessness prevention?
3. What needs to happen to improve the delivery of housing options and homelessness prevention services and the outcomes achieved for service users?

- There is some evidence of good practice and outcomes from housing options and homelessness prevention activities

Many respondents highlighted the benefits, in principle, of housing options and homelessness prevention activities. For example, North Ayrshire Council stated that housing options is an effective prevention tool if it implemented and resourced effectively. They stated that as housing options is not a prescriptive there are various pathways and outcomes that can produce a bespoke sustainable outcome. Some respondents (e.g. Fife and South Lanarkshire...
Councils and Glasgow Housing Options Board) **cited housing options as being responsible for a decline in homelessness applications.** The City of Edinburgh Council noted a 38% decrease in applications in its area over the 10 years from 2006-07.

Various examples of good practice were provided. For example, Angus Council mentioned its Young Person’s Housing Options Service pilot, established in March 2012, which made significant progress in reducing and preventing youth homelessness in Angus. The team worked with young people to prevent them becoming homeless and to explore various options to enable them to sustain current and /or future accommodation. Key to their success was preventing homelessness via family mediation and negotiating a planned approach to leaving home when remaining in the family home was not feasible. The posts have been made permanent, and the practices and procedures were merged and implemented within the existing Housing Options Service across all age groups.

Other submissions mentioned work to deal with particular groups of people particularly at risk from homelessness such as care leavers and prisoners (e.g. South Lanarkshire Council and the City of Edinburgh Council). Other examples of good practice cited included tenancy sustainment activities, mediation services, mentoring and peer support and preventing eviction from private rented housing.

East Lothian Council’s submission stated that the key to the successful practice in their area had been an **awareness of the local housing environment, a commitment to preventing homelessness, and ensuing that complementary services, such as family mediation and financial advice services, exist to assist clients and prevent homelessness.** COSLA was of the opinion that housing options generally works well. They also said it is most effective when delivered at the earliest possible opportunity and linking in with services that go wider than housing.

While many of the respondents were supportive of housing options in principle there were some comments suggesting that there is scope for improvement in practice.

- **The delivery of housing options can be variable and inconsistent**

Some respondents (e.g. Cyrenians, North Lanarkshire Council, Simon Community) pointed to **variable practice and inconsistent delivery of housing options across the country.** How well housing options was delivered could depend on the range of housing options available in local communities and the extent to which partner organisations were involved in planning and providing services.

The Simon Community stated that it experienced a very **varied approach between Health and Social Care Partnership and local authority areas, particularly where homelessness is not a devolved area to the local Integrated Joint Board.** They indicated that in these situations the focus remains on a housing-led intervention and fully integrated responses to individual need can be challenging.

The **lack of a gendered approach to homelessness prevention** was noted (Scottish Women’s Aid and Engender). Scottish Women’s Aid referred to their
research project on homelessness as a result of domestic abuse, which was led by women with direct experience of these issues. This highlighted women’s concerns about not receiving the information and support they needed, especially where they wanted to remain in their own home. Many women experienced a lack of control over the situation and continued to feel unsafe. The research found that most service providers lacked a gendered understanding of domestic abuse.

A number of respondents welcomed the forthcoming housing options toolkit (e.g. Shelter Scotland, Angus, COSLA, Fife and East Lothian Councils). Respondents considered that this may help to deliver more consistent quality services across the country. Despite the need for greater consistency, it was also recognised that there will still be local flexibility in how services respond depending on the local infrastructure and resources (North Lanarkshire Council).

The need for specific training on domestic abuse (Edinburgh Women’s Aid) and for gender based violence (Homeless Action Scotland) was raised. LGBT Youth Scotland also suggested that staff in the housing and homelessness sector should receive LGBT awareness training and ensure that their domestic abuse training is inclusive.

LGBT Youth Scotland cited evidence from a consultation undertaken by the LGBT Youth Commission on Housing and Homelessness. This identified that LGBT young people who are homeless or at risk of homelessness face several barriers to benefiting from homelessness prevention and housing options. For example, young people may not feel comfortable to come out to services and this can affect access to appropriate support e.g. they may not give full reasons why they left home and so could be deemed intentionally homeless.

- There needs to be a wider range of housing options and services available

A number of respondents suggested that there need to be a wider range of housing options and services available. For example, Crisis stated that the range of housing options interventions being used does not appear to match with the causes of homelessness. They argued there is substantial room for a more active and imaginative approach to housing options beyond straightforward information and advice giving. Similarly, Cyrenians considered that housing options could be better tailored to service users’ own personal needs and could be a service that goes broader than simply housing. Shelter Scotland stated that there needs to be a better understanding across the board as to the root causes of homelessness both generally and in specific areas or with specific client groups. Local authority services should be based on this understanding.

Increasing housing supply, particularly in the social rented sector was mentioned by many as a way to maximise the effectiveness of housing options. ALACHO stated there needed to be more choice and control for people in the housing system. While the need to improve choice and control for applicants to social housing was recognised, North Lanarkshire Council also said that there was a need consider how to manage aspirations and expectations when these are not always reflective of available stock in the area concerned.
Some respondents noted the need to develop a **broader range of options to meet the needs of single young people** (North and South Lanarkshire, East Lothian Council, SOLACE). For example, East Lothian Council said that new accommodation models such as mid-market rental, and shared flats (especially for single people) can help prevent homelessness or at least provide an alternative to a Scottish secure tenancy which is increasingly difficult to deliver.

The City of Edinburgh Council’s response stated that in order to provide a more holistic housing options service, **employability services, welfare benefit advice and income maximisation needs to be embedded into homelessness case management**. Similarly, Crisis said that **local authorities should ensure that other public and voluntary organisations such as Jobcentres, health services, welfare rights and debt advice services are equipped to signpost people to Housing Options**. This should include co-location of housing options services where appropriate.

COSLA made the point that housing options delivery and improvement work should be **fully resourced if it is to be successful**. They noted the benefits of housing options work to services beyond housing.

- **Housing options is less effective for those with multiple complex needs**

Some respondents, (e.g. Simon Community, Turning Point Scotland, South Lanarkshire Council) said that **housing options does not work that well for those with complex health or social care needs**. The Simon Community stated that for people with complex needs, the process can be hard to understand and create further barriers for those with chaotic lifestyles. Turning Point Scotland noted that people who have the most complex needs are often unable to engage successfully with housing options due to challenges such as keeping appointments.

Julie Jackson, from NHS Greater Glasgow and Clyde Psychological Trauma Service, stated that she was aware that a number of people using homelessness services in Glasgow are experiencing mental health difficulties relating to childhood trauma e.g. emotional/physical/sexual abuse as well as trauma in adulthood e.g. violence or domestic abuse. She said that it was **vital that frontline housing/third sector services are able to assess for a trauma-related presentation and be familiar with when and where to refer someone for assessment and potential treatment**.

- **There is a need for earlier homelessness prevention activities**

Several respondents made the point that **housing options and homelessness prevention can be more effective if advice is provided at an earlier stage** (e.g. CJVSF, Simon Community, Aberdeenshire Council). For example, Fife Council said that 32% of prevention customers make contact when they are at crisis point, reducing the range of options available to them. If they could offer advice and assistance to customers at an earlier stage there may be more choice available to them. The Criminal Justice Voluntary Sector Forum referred to prison leavers and
said that support to prevent people becoming homeless on release needs to start at an earlier stage.

The Simon Community gave an example of a partnership approach aimed at “upstream prevention”. They deliver a multi-partner Support Officer Service in partnership with five community housing associations in the North of Glasgow. Referrals come from Housing Officers who identify support needs or access challenges with their tenants. They state that there are many examples of the identified need relating to an apparent practical issue e.g. the need to gain access for gas maintenance and what emerges is evidence of significant risk factors that, once support and the appropriate connections are made, can be easily mitigated against.

South Lanarkshire Council stated that it is important to de-stigmatise homelessness so that people who may be at risk feel able to ask for help at an earlier stage. The Council’s homelessness service has been active in schools over the past 5 years to ensure that all year 3 and 4 pupils discuss homelessness and how to prevent it.

- There is a tension between housing options and local authority statutory duties

Govan Law Centre was concerned that local authorities’ legal duty to prevent homelessness and provide accommodation is often ignored in practice by many councils in Scotland. Shelter Scotland also said that it shared concerns that housing options is sometimes misused to ‘gatekeep’ access to homelessness service. The Criminal Justice Voluntary Sector Forum (CJVSF) stated that the ambition of homelessness legislation is not working in practice, for example, homeless people may be offered a sleeping bag because a space in temporary accommodation is not available (for further information on homeless persons access to rights see question 19).

Some local authority respondents (e.g. North Lanarkshire and East Lothian Council and ALACHO), and an individual respondent, argued that there was a tension between housing options and the legislative framework governing homelessness. Reference was made to the Scottish Government/COSLA housing options guidance published in 2016. The guidance advises that when a housing options approach is made, and if the local authority has reason to believe an applicant is homeless (or threatened with homeless within 56 days), then the local authority has a statutory duty to investigate for homelessness. Local authorities should progress the homelessness assessment and record an HL1 return\(^1\) and can progress housing options approaches alongside the homelessness assessment. It was suggested by some (EG North and South Lanarkshire Council) that this approach focused on process rather than outcomes.

Falkirk Council stated that the current guidance is inconsistent and there needs to be clarity about the distinction between housing options routes and routes to

\(^1\) These are the homelessness statistical monitoring returns.
homelessness. Other positive comment about the guidance was made (EG Angus Council).

ALACHO expected that the number of homeless applications recorded will rise as the new housing options guidance is implemented. Longer-term they argued that there needs to be an effort to ensure a more consistent approach to housing options services and outcomes and the **statutory framework needs to be modernised to put the prevention of homelessness on a statutory footing**. They believed that the experience of similar legislation in England and Wales could be helpful in developing a new legal duty in Scotland.

A couple of respondents also referred to **legislative developments in England and Wales**. Crisis recommended that the Scottish Government examine the new prevention and relief duties in the Housing (Wales) Act 2014 and the Homelessness Reduction Act 2017 in England to consider how prevention support could be improved in Scotland, to provide a coherent route through local authority homelessness support.

- There are positive examples of effective relationships between all the relevant agencies working on homelessness prevention

Many respondents recognised the need for effective multi-agency responses to prevent and tackle homelessness given the wide range of factors that can cause homelessness. Shelter Scotland was of the view that relationships between agencies are generally improving, especially between housing and health services.

**Examples of good practice were cited.** NHS Health Scotland cited examples of effective relationships at a strategic level. For example, NHS Scotland hosts the National Health and Homelessness Group, which includes representation from national and local government; the health sector, including public health, primary care, oral health and psychology; housing; welfare; academia; and homelessness charities. This group was established to support implementation of the opportunities identified in the Scot PHN report, ‘Restoring the public health response to homelessness in Scotland’ and continues to identify new opportunities for homelessness prevention as well as its mitigation.

Cyrenians mentioned their **positive experience of good relationships with health and social care bodies within Edinburgh’s locality hubs**. Scottish Women’s Aid referred to research in Fife which led Fife Housing Partnership (FHP) together with Fife Violence Against Women Partnership (FVAWP) to recognise that significant improvements were required in the way in which FHP and FVAWP partners respond to women and children experiencing domestic and / or sexual abuse and who are also at risk of homelessness. Following this, a working group, including members of the community research team was established and an improvement plan has been developed for implementation over the next 3 to 5 years. This requires commitment to, and investment in, joint working involving key strategic and service delivery partners and the involvement of women with direct experience of these issues.
Many respondents referred to various **protocols** that were in place in their areas, for example for care leavers or prison leavers. Many also mentioned the establishment of **multi-agency groups** in their areas that may assist in the prevention of homelessness (e.g. Financial Inclusion Groups, Employability working groups (Aberdeenshire). Police Scotland referred to work in Aberdeen where the welfare reform board and the Homeless Strategy Operations Group looked at the impact of welfare reform on the residents in the city. The group meet on a 6 weekly basis, with attendees including the Safer Cities representative, Partnership Development officer, as well as Grampian Women’s Aid and a range of accommodation providers.

Some respondents gave example of **situations where there was a particular need for joint working**. For example, ALACHO, SFHA, Criminal Justice Voluntary Sector Forum and others noted the particular needs of **people leaving prison**. NHS Scotland noted the “excellent” partnership working taking place between the Scottish Prison Service (SPS), Shelter Scotland and the Chartered Institute of Housing to develop standards for SPS to ensure no prisoner is released into homelessness (due for publication in 2017).

**COSLA** noted the **importance of a good relationship between local authorities and housing associations within multi-agency arrangements**. They said that it is important that councils and RSLs are not ‘pitted off’ against one another. COSLA also said that to aid the success of multi-agency work at a local level, there must be **strong national, strategic leadership**.

- **There is scope for Improvement in partnership working to ensure a holistic approach to support homeless people**

A common theme was the need to develop a **holistic approach** to support homeless people. While evidence of good working relationships between relevant agencies was cited, many respondents suggested there was scope to improve the **practical experience of joint working between all the relevant sectors and support agencies** (e.g. East Lothian Council, Shelter).

A number of respondents made the point that **preventing homelessness was still largely viewed as the responsibility of local authority housing services** (Scottish Women’s Aid, Homeless Action Scotland, NHS Scotland). Homeless Action Scotland said there was a need to actively include housing associations and the third sector, improving communications and practice across the sectors and allowing different sectors to learn from one another. Dumfries and Galloway Council said that a joined up approach could be aided by **more co-location of services and clearer referral pathways**.

The potential to build on work within the **Health and Social Care Partnerships** was noted by some. North Lanarkshire Council said their links with health services have improved and that while the integration of health and social care is adding complexity it could also open up opportunities to enhance service delivery.
• Potential expansion of statutory duties to other bodies

Some respondents (SOLACe, East Lothian Council,) noted that statutory homeless duties are limited to local authorities. They argued that to ensure better joint working consideration should be given to widening this duty to other key public bodies. North Ayrshire Council said that there needs to be recognition that the prevention of homelessness is a statutory responsibility across the public sector, including commissioned services. They stated that organisations need to be accountable and demonstrate how the prevention of homelessness fits in with their strategic planning, service modelling and staff training framework.

Highland Council stated that it is notable that arising from a shared statutory duty, corporate parenting appears to be providing examples of shared responsibility and co-ordinated activity.

• Other suggestions for improving housing options in practice

A wide range of other suggestions for improving the delivery of housing options were cited. These included:

• A Scotland wide “housing options improvement plan”, agreed between the Scottish Government, RSLs, local authorities and the regulator with the specific objective of ensuring greater consistency of outcomes and testing approaches to linking and integrating “prevention” and “response” elements of the legislation (ALACHO).

• Consideration/development of personal housing plans (ALACHO and Crisis).

• The revision of the Scottish Government’s Allocations Guidance to ensure that allocations policies give higher priority to homeless households and supports a significant reduction in both the numbers and length of stay in temporary accommodation (ALACHO).

• The number of lost contacts from housing options and statutory homelessness services needs to be reduced, for example through outreach activity or working with the third sector to maintain contact and ensure they receive appropriate help (Crisis).

• Stronger protocols and referral mechanisms are needed between local authorities and Scottish Prison Service (South Lanarkshire Council).

• A National Homelessness Strategy for Scotland that recognises the role discrimination plays in increasing the risk of LGBTI young people becoming homeless (LGBT Scotland).

• Care leavers must be fully involved in holistic, person centred pathways planning, and have opportunities to make carefully planned, staged transitions to new living arrangements that will meet their needs. This process needs to involve all partners’ e.g. social work, housing, health, and education/training. (Scottish Care Leavers Covenant)

• Further roll out of peer-to-peer mentoring across a range of services including homelessness (Cyrenians).

• The third sector needs to be viewed as an integral part of the multi-agency approach, beginning with involving charities in the commissioning process and co-producing services (Cyrenians).
• There should be a **co-ordinated focus on people fleeing domestic violence** (SOLACE)/ develop a specific housing options approach for women experiencing domestic abuse (Scottish Women’s Aid)

• Commitment to **gendering approaches to tackling homelessness** (Engender).

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

• There are some problems that limit the use of private rented housing as an option for preventing and responding to homelessness

Many respondents suggested that while the private rented sector has role to play in preventing and responding to homelessness there were a number of problems that currently limited its use. It was noted that affordability, quality and security are important to tenants but this was not always available in private sector housing. Scottish Women’s Aid said that the sector was viewed as insecure and insufficiently regulated. This is particularly important for women and children who have experienced domestic abuse and need time and stability to recover and rebuild their lives.

Aberdeen Council said that the sector needs to be well managed and maintained to become a sector of choice. For that to happen there needs to be targeted information and advice coupled with tougher enforcement for landlords who fail to adhere to the regulatory requirements. This requires resources.

**Welfare Reforms**

A commonly mentioned problem to making more use of private rented housing to prevent and respond to homelessness was in relation to the impact of welfare reform (e.g. Debbie McNab, Falkirk Council, Aberdeen, COSLA, CPAG, Citizens Advice Scotland). For example, changes to the Local Housing Allowance Rates (which housing benefit for tenants in private rented housing is based on), or the benefit cap has reduced the amount of benefit for some tenants. For some, this means the affordability of private rented housing is a problem.

Other respondents (e.g. East Lothian Council, Highland Council, Debbie McNab) pointed out that landlords are also concerned about letting to tenants on benefits for various reasons.

• **There is potential for making further use of the private rented sector to prevent and respond to homelessness.**

A number of respondents (e.g. Crisis, Shelter Scotland) also thought there was further scope for expansion of the use of the private rented housing to prevent and respond to homelessness.
Some respondents outlined the use of rent deposit schemes to help homeless/potentially homeless people access private rented housing (e.g. Aberdeenshire Council). East Lothian Council noted that welfare reform, especially the full digital UC service, has seen the contribution of rent deposit schemes significantly reduced. Crisis said that a National Rent Deposit Bond for Scotland would provide a national tool which accredited local authority and third sector schemes could apply for to support homeless people into the private rented sector.

Aberdeenshire Council suggested there needed be some incentives and a shift in culture and mindsets as landlords tend to view this as a role for the council.

The Glasgow Homelessness Network suggested that there could be an increased focus on the development of social lettings agencies which can help ensure that the needs of vulnerable people are met in the private rented sector. Shelter Scotland recently launched a pilot Letting Agent Plus project, which provides a point of contact and support for landlords who are letting to tenants who require extra support to maintain a tenancy.

Some respondents referred to the introduction of a new private residential tenancy in December 2017 to superecede short assured tenancies. The new tenancy aims to provide tenants with greater security of tenure which could overcome some of the perceived problems with the sector. Shelter Scotland stated that there needed to be an awareness raising campaign for tenants and landlords in order to make its roll out effective.

**Temporary Accommodation**

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

6. 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?

- Some councils report a significant and increasing pressure on temporary accommodation

Some councils reported significant and increasing pressure on temporary accommodation in their areas (e.g. Angus, Highland, North Lanarkshire, East Lothian). In some cases, this was despite an overall drop in homeless applications (e.g. South Lanarkshire, Aberdeenshire). East Lothian Council noted that despite an increase of around 40% in temporary accommodation provision their reliance on B&B has approached pre 12/13 levels. Of most concern to them was the increased use of B&B accommodation for families with children.

The length of stay in temporary accommodation was reported to have increased in some areas. The City of Edinburgh Council reported that the average homeless case
length has increased from 175 days in 12/13 to 286 in 16/17, an increase of 111 days.

It was noted that a longer period of time in temporary accommodation may not always be inappropriate where the temporary accommodation is suitable, meets the needs of the family and appropriate supports are provided to the household (e.g. COSLA, South and North Lanarkshire). COSLA, and SOLACE stated that it important to focus on person centred outcomes.

Various reasons were cited for the pressures on temporary accommodation. Many of these reasons centred on **barriers to moving on to permanent accommodation**. Reasons included:

- **Lack of suitable permanent accommodation of the right size in the right places** (e.g. North Lanarkshire, Highland South Lanarkshire, Edinburgh).
- The reluctance of some people to accept offers of housing because of concerns about affording it in the future i.e. young people in insecure employment (North Lanarkshire).
- **Welfare Reform** - impact of welfare reform on younger people’s ability to meet housing costs (South Lanarkshire) and the benefit cap means that privately rented property is no longer an option for larger families and this has increased the number of children in temporary accommodation (Fife)
- The **increase of homeless households with multiple and complex needs** was also cited. Many of these people are unable to access the health and social care services they need to live independently successfully (Highland, Dumfries and Galloway).
- **A reduction in voids / turnover of social rented stock which has reduced the level of lets** to discharge their homelessness duties (North Ayrshire, South Lanarkshire)
- **A rise in homeless applications** (Angus),

The **increasing demands on temporary accommodation** were also noted by other respondents (e.g. Legal Services Agency, Simon Community, Shelter, Crisis, Salvation Army, Youthlink Scotland).

- **Improvements in temporary accommodation**

Some councils noted efforts to improve their management of temporary accommodation. Falkirk Council pointed to its effective voids process to ensure that temporary accommodation properties go back into the letting pool as quickly as possible and intensive tenancy support to ensure that applicants get help to sustain their tenancies. They indicated there has been an improved turn-over of its temporary accommodation since the introduction of their choice based letting system. Some local authorities cited evidence of satisfaction with their temp accommodation (Aberdeenshire). Others noted that the use of B&B was a last resort measure.
• Temporary accommodation can be inappropriate

The inappropriateness of some temporary accommodation was highlighted (Aberdeen, Scottish Women’s Aid, Simon Community, Scottish Care Leavers Covenant, Advisory Group at the Life Changes Trust).

LGBT Youth Scotland cited evidence from a consultation that LGBT young people are concerned that they may be provided temporary accommodation that is inappropriate for their gender identity. Some youth homelessness support services only accommodate single gender groups; with a lack of training and understanding of transgender identities amongst support staff, young trans people may experience prejudice and discrimination from other service users or staff and volunteers.

Action for Children said that there is a lack of temporary accommodation for young adults who are in education and employment. They believed that young people should not be placed in adult hostels and that housing options and prevention work should be priorities so that safe and suitable accommodation can be found for them. Their response indicated that there are examples of housing providers working together through the provision of accommodation and support to meet young peoples’ needs. For example, in West Lothian, this approach enables young people to live in supported flats provided by the Rock Trust, Open Doors, and receive outreach support from Action for Children to ensure they have the time to learn the skills to sustain their own tenancy.

• Temporary accommodation is not always offered by local authorities when it should be

Others noted that sometimes homeless people were not offered temporary accommodation when they are entitled to it under the homelessness legislation. Cyrenians, Legal Services Agency, Govan Law Centre, Crisis). This issue is considered more under q19 regarding access to rights.

• Temporary accommodation is expensive

The high costs of temporary accommodation were noted by some (e.g. Simon Community, Debbie McNab). This prevents individuals from seeking employment and pursuing any training or education due to the personal liability for the rent and housing management charge. Action for Children noted that housing benefit legislation means that young people in education and or employment are not entitled to access support for covering rent and support costs. This has resulted in a number of young people having to sofa surf or long term sleep in cars.

• Suggestions for improvements to reduce the use of temporary accommodation and to improve services users experience of it

Suggestions included:

• Increase housing supply, especially for families, people with
multiple and complex needs and those with disabilities to reduce reliance on temporary accommodation (Shelter Scotland). It was also noted that a wider range of tenancy options for young people was needed. RSLs could assist by leasing more of their stock, at a reasonable cost, to local authorities to be used as temporary accommodation. (Highland Council).

- **Focus on homelessness prevention** (COSLA, Fife).
- **increase the efficiency of the flow** through of individuals through temporary accommodation (Fife, Bethany Christian Trust)
- **Extend the unsuitable accommodation order to single people** (the order essentially specifies that B&B accommodation must not be used for families for more than 14 days except in exceptional circumstances) (Crisis, Homeless Action Scotland).
- **End winter nightshelters and the use of B&Bs** which are unfit for purpose and prolong homelessness. This could be replaced by a larger number of temporary furnished flats with the possibility of support (Homeless Action Scotland). End use of B&B or hotel accommodation ensure that all temporary accommodation also delivers immediate access to support and housing advice (Simon Community)
- **Minimum standards of accommodation** across all forms of temporary accommodation, including B&Bs and women’s refuges (Homeless Action Scotland). Bring standards of temporary accommodation up to the standard of social sector accommodation (Shelter Scotland)
- **Temporary accommodation should be better suited to the mix of households needing it** (ALACHO, Scottish Women’s Aid)
- **A more effective range of support services** need to be available for those in temporary accommodation (ALACHO).

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

All respondents who answered this question raised some concerns about the funding of temporary accommodation. Shelter Scotland pointed to its recent research on this subject.

- **Welfare Reform is a major concern**

Respondents were concerned about the impact of welfare reform measures on temporary accommodation. Universal Credit (UC) claimants in temporary accommodation will have their claim based on Local Housing Allowance (LHA) rates. With the roll out of UC there was a concern there would be a benefit shortfall. This concern was echoed by a number of others (e.g. Edinburgh, SOLACe, Fife, CPAG).

Highland Council noted that this change was making temporary accommodation unaffordable and people were leaving with arrears. They said most tenants are experiencing an average shortfall of £100-£110 per week in their rent. Currently 205

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2 Tenants benefit is based on the size of the property they are entitled to under the LHA size criteria.
tenants residing in temporary accommodation are in receipt of Full Service Universal Credit, of these 200 (97%) are in arrears. The cumulative rent arrears for all of these cases currently equates to £339,710.

South Lanarkshire Council said that the impact of UC and the LHA cap in temporary accommodation would result in an estimated shortfall of £2.567m in their temporary accommodation budget by 2021/22.

From April 2017, the management fee for temporary accommodation has been removed from benefits. The UK Government transferred an amount to the Scottish Government (£22.5m) for it to distribute to local authorities to cover management costs. There was concern that the additional funding would not cover the funding gap (ALACHO, Shelter Scotland, Fife).

The definition of exempt and specified accommodation (for benefit purposes) was raised (e.g. CIH Scotland, South Lanarkshire). It was also noted that temporary accommodation across Scotland is mostly provided by local authorities and does not fit the DWP’s specified accommodation definition (which is funded outwith UC by separate benefit arrangements) although it functions as supported housing (South Lanarkshire).

- **Other welfare reforms impacts**

Other impacts of the welfare reform were noted. These included:

- The risk of non-recovery of rent from tenants when full service UC rolls out (Edinburgh, SOLACE, CIH) Falkirk Council said that this highlights the need for local authorities to receive payments direct to ensure that temporary accommodation stock is sustainable. East Lothian Council said it had deployed additional staff to deal with the impacts of increased arrears – this diverted staff from helping clients move on from temporary accommodation.

- The UK Government’s plans to cap social tenant’s entitlement to help with their housing costs at the LHA rates (used to calculate housing benefit for private sector tenants) for their household size from 2019 and the potentially negative impact on young people under 35 (CIH Scotland).

- The lower benefit cap. Aberdeen City Council noted that since it was introduced 46 households across their temporary accommodation have been affected. The total amount of their arrears is £86,147.52.

- Processes and administration of UC in full service areas was creating problems. Delays mean that they are not guaranteed a direct payment, particularly in cases where the tenant moves out or has a change of circumstances during the UC Assessment Period (Highland).

- Many EU nationals who are not working may not be entitled to any benefits, or not be entitled to HB exclusively; however this is often at odds with homelessness legislation which is not aligned. There are some instances where EU nationals will be entitled to homelessness assistance but not the benefits to pay for it. (CPAG)

- **Suggestions for improving funding for temporary accommodation**

Some respondents suggested that the housing element of UC is not appropriate or flexible enough to support clients in temporary accommodation (e.g.
Aberdeen, Fife, Aberdeenshire Councils, ALACHO). Aberdeen City Council said that if this was not changed the drain on the council’s general fund will be very high. Fife Council said that a new Supported Housing Allowance, banded to reflect the actual cost of provision in the sector, should be introduced instead.

It was also suggested that the definitions of temporary accommodation and exempt ‘specified accommodation’, for benefit purposes, would benefit from a review based on the function and purpose of the accommodation rather than who happens to be the landlord and/or provides the support (e.g. South Lanarkshire Council). Scottish Women’s Aid called for a specific funding model for refuges.

ALACHO said that temporary accommodation rents should not be a barrier to those in work, training or education. Some councils noted work undergoing to change temporary accommodation models to make them more affordable (Aberdeen City Council and Highland Council).

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

Some local authorities (e.g. Fife, Angus, Aberdeen) gave examples of how their allocation policy works in terms of prioritising applications from homeless households. North Ayrshire and Fife Councils, for example, operate a quota system.

In North Ayrshire homeless people are currently being allocated 25% of all vacant stock. The council were of the view that this works well for their clients. In Fife, the quota system has been increased in 2017-18 for homeless applicants to 45% of total allocations. East Lothian Council noted that 70% of its general needs housing group is allocated to homeless people. The council is reviewing its policy to help address the pressures on their other re-housing requirements. They stated that this higher than average % of allocations to homeless people could potentially reinforce the idea that homelessness is seen as the main way of accessing social housing which in turn could undermine prevention and option services and increase demand on temporary accommodation.

- **RSL Nominations and Section 5 referrals**

Reference was made to the process by which local authorities make homelessness nominations to RSLs. Fife Council said that RSLs they work closely with are required to make 35% of their allocations to homeless applicants. In East Lothian, all RSLs operate on the same nomination basis of 50% of voids being allocated to homeless people, although in practice the type of RSL stock means that around 40% of supply is committed to homeless people.

SFHA highlighted a concern of one its members regarding nominations made by local authorities. Sometimes the association is not made aware of the involvement of other support agencies and sometimes the support needed to sustain a tenancy might not be in place when the tenancy starts.
Shelter Scotland also said that the process of section 5\(^3\) referrals is patchy across the country with a mixed picture of process and choice. Homeless Action Scotland recommended that the Scottish housing Regulator undertake a Thematic Inquiry into Section 5 referrals to ensure consistency across Scotland.

- **There are mixed views on choice based allocations**

Few of the respondents that answered this question operate a choice based allocation process. It is being considered in Fife and in Angus councils. Angus Council hoped that this would encourage more choice and be a fairer, more transparent system for applicants.

Falkirk Council said it operates a choice based letting system. Since its introduction they have seen an **improvement in how they are able to prioritise their homeless applicants**. This has been underpinned by close case management and tenancy support. It also has an effect on the turnover of their temporary accommodation stock. On average homeless applicants are rehoused within 6 months.

Aberdeen City Council uses a choice based letting system to allocate 2 bedroom tenement flats in one area of the city. This is done in partnership with Homehunt NES. Case officers working with statutory homeless applicants can bid on their behalf if they have difficulty doing so.

The City of Edinburgh Council said it operates a choice based lettings scheme in conjunction with several RSLs. Additional priority is awarded to homelessness clients. Because of this, they said that a significant number of the properties advertised through the choice based lettings scheme are allocated to homeless clients.

Some other respondents made **less favourable comments about choice based letting**. The Simon Community, for example, said that **choice based letting is predominately online but of many of their service users face barriers from digital exclusion**. A survey of their service users revealed that less than 20% had ever had an email address, most of those that did were under 25.

A member of staff from Women’s Aid based in Edinburgh raised a number of concerns about the operation of the choice based letting system in Edinburgh. For example, they indicated that homeless people are expected to make two realistic bids and one ‘wish list’ bid. They suggested there were **issues with realistic bids and who decides what areas are realistic**. They stated that homeless people have lost their priority as they have not been bidding realistically or they have not made any bids as they have not found anywhere they would want to stay. The Big Lottery Fund included comments from its Street Legal Project. They referred to care leavers in Edinburgh making a homeless application. They said that **care leavers have to**

\(^3\) Section 5 referrals (Section 5 of the 2001 Act gave registered social landlords the statutory duty to house homeless households
bid for permanent accommodation using an adult system which is very difficult to use without support.

- There could be more choice and flexibility in allocations for homeless people

Other points regarding allocations and permanent accommodation were made. CPAG suggested that landlords may wish to consider having more flexible allocation policies to allow families affected by the benefit cap to move from the private rented sector to the social rented sector even though they might be technically overcrowded.

Shelter Scotland, Scottish Women’s Aid and Legal Services Agency suggested that choice in allocations could be improved. Scottish Women’s Aid referred to a research project it had undertaken in which some women commented that, as they would only receive one offer from the council they had no option but to take it. Others mentioned that they were told they had to take what they were given. Women also raised concerns about being offered housing close to where their abuser lived.

The Legal Services Agency highlighted the fact that a local authority could discharge its duty to a homeless person by making one offer of property. They said that situations should be dealt with on a case by case basis, and there can be circumstances where multiple offers would be appropriate. They also pointed out that homeless people may not be aware of the consequences of refusing an offer of accommodation and suggested that people offered accommodation should be directed to law centres for further advice.

Multiple and Complex Needs

9. 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?

10. 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?

Many respondents recognised that homeless people with multiple and complex needs may have had traumatic backgrounds and subsequent mental health problems. Homelessness is a late manifestation of such backgrounds. The need for service providers to recognise and understand pathways into homelessness was considered important.

- There needs to be a holistic approach to addressing multiple and complex needs

It was also noted that responses to homeless people with multiple and complex needs have often been based on a single problem by a single agency (e.g. NHS Greater Glasgow and Clyde Directorate of Public Health (NHSGGC), Dr Burley).
David Duke, in the Street Soccer Scotland response, stated that it seems as if the service commissioning process creates division between providers due the nature of competitive tendering. This leads to an organization first approach as opposed to a person/cause first approach.

Many respondents said that a holistic approach to addressing individual’s multiple needs was needed. This requires input from many services. Dr Burley said that health services need to be more joined up and set up differently. He said that often individuals were described as “not engaging” when they were engaging but just not in the way that the service would like them to.

As previously mentioned, a few respondents thought that health and social care integration offered an opportunity to improve joint working between services and to improve outcomes for this group. In Glasgow City, homelessness has been included in health and social care integration to this end (NHSGGC).

NHS Scotland recognised that the prevention of homelessness cannot be led by housing services alone. They outlined the role that the NHS and partners can contribute through early intervention and prevention activity. In particular, services such as primary care, mental health and substance use services can contribute to the prevention of homelessness by identifying those who are at risk and signposting or supporting access to welfare and housing advice, including that provided by the third sector. In addition, homeless people and those at risk come into routine and regular contact with hospitals; therefore, contacts made in A&E or during hospital admission and discharge are good opportunities for intervention and referral. They stated that there is much good work is already happening in this area which can be built on.

- **Psychologically informed environments are valuable**

Some respondents (e.g. Dr Burley, North and South Lanarkshire, Shelter Scotland, NHS Scotland, NHSGGC, Turning Point Scotland) mentioned “Psychologically Informed Environments (PIE).” A PIE provides an understanding of the psychological and emotional needs of individuals with traumatic backgrounds.

Rowan Alba referred to the Access Point in Edinburgh an “excellent” service. They said the presence of a clinical psychologist, delivering support and supervision to support workers makes them more psychologically informed.

- **There are examples of good practice**

Various examples of good practice were provided.

For example, the Simon Community highlighted the CAN (City Ambition Network) in Glasgow which is a third sector led partnership \(^4\) that was formed to find

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\(^4\) This involves the Simon Community, Glasgow City Mission, The Marie Trust and Glasgow Health and Social Care Partnership.
collaborative ways of working that could address the needs of vulnerable people who were in a circular pattern of rough sleeping, addiction, incarceration, re-traumatisation and significant health and mental health inequalities. This relatively small group of around 70 service users were ‘crashing’ in and out of services. The CAN brought organisations and the right people together to take a collaborative, flexible and assertive response. This has demonstrated significant life changing opportunities for the small number of people in the pilot stage. They are confident that a number of people currently supported by the CAN would be dead if not for the work of the team. The CAN is expanding with the support of multi-year funding from the Oak Foundation.

Fife Council highlighted an intervention project with two specialist staff members to be based in A &E at the Victoria Hospital Kirkcaldy who will work closely with hospital staff to engage patients who are identified as having insecure housing. Workers will follow a five-stage process to engage with the patient, undertake an immediate crisis response, work with them to identify key goals, put this into action focused on helping the person to develop skills and resilience, and finally support them to move on.

Julie Jackson works for NHS Greater Glasgow and Clyde Psychological Trauma Service. This is a tertiary level mental health service which offers multidisciplinary psychologically informed interventions to clients who present with Complex Post Traumatic Stress Disorder (CPTSD) following experiences of complex trauma. She stated that the service offers training to services working with the homeless client group to increase awareness about CPTSD. Training includes defining complex trauma, understanding the mental health impact and identifying presentations relating to complex trauma, safety planning, and professional self-care to prevent vicarious traumatisation. They also provide consultation to teams or multi-agency meetings about individuals who they might be struggling to engage in a meaningful way.

Street Soccer Scotland referred to the Change Centre model which is designed to end repeat episodes of homelessness for men experiencing complex and multiple disadvantage by providing wraparound support in preparation for a long term sustainable housing solution.

- Other suggestions for improving services for homeless people with multiple and complex needs.

A range of other points were made about services could be improved, some of which included:

- The need for good relationship building and a realistic time frame for caring for individuals (Cyrenians and Dr Burley).
- The need for continuity and security of funding (Cyrenians, Shelter). Funding within housing support does not readily enable providers’ flexibility to increase staffing levels or staff qualifications (Action for Children
- Using a personal housing plan approach to ensure that housing solutions are person-centred (South Lanarkshire)
Better access to appropriate services and systems required, better protocols for sharing information to allow joint up working for specific clients (Aberdeenshire).

People with lived experience of homelessness should be closely involved in the planning, design and delivery of services.

Data linkage between different services can help inform multi-agency working. NHSGGC is undertaking a data linkage project to bring together data from homelessness services and the NHS, to understand health outcomes among people with multiple and complex needs.

Homelessness services should embed a gendered policy and practice response and be able to recognize the different experiences of trauma survivors and be equipped or work with specialist agencies to address their specific needs (Scottish Women’s Aid)

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

The relatively poor health, and particularly poor mental health, of homeless people was noted (e.g. Govan Law Centre, Marie Cure, Cyrenians). Govan Law Centre stated that the average age of death for someone who is homeless is just 47, 30 years younger than the national average. The Dental Health Services Research Unit highlighted the relatively poor oral health of homeless people.

NHSGGC stated that people who are homeless have high rates of preventable ill-health, resulting in high rates of A&E attendances and unplanned hospital admissions. They also have longer durations of stay once admitted, largely due to the severity of their conditions. They said that improving access to primary healthcare and preventative interventions is therefore likely to be a cost-effective, and worthwhile form of preventative spend.

Marie Cure’s submission cited research which suggests for homeless people with a terminal illness, deteriorating health, increasing isolation and poor mobility may make access to healthcare services, particularly specialist palliative care services very difficult. They said there was a lack of information to show that homeless people are actually accessing palliative care. They made a number of recommendations to address the situation.

Dr Rebecca Forrester and Dr Gemma Findlay (Inverclyde Community Mental Health Team, NHS Greater Glasgow & Clyde) in collaboration with NeuroTriage\(^5\) & the Homelessness and Head Injury Research Group cited research that has shown an association between homelessness and head injury. They considered that it is plausible to consider that sustaining a head injury could contribute to the onset of homelessness and/ or perpetuate this situation once it has occurred. They quoted a research study that showed a lack of awareness about the effects of head injury amongst the participants and support staff. Some participants in the study had

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\(^5\) NeuroTriage, Community Interest Company, Liverpool,
substance misuse issues highlighting that head injury and homelessness cannot be studied in isolation. They suggested that care providers, health care professionals and policy makers should be made aware of the prevalence of head injury in this population and the cognitive and behavioural implications that this may have.

- **There is a need for collaborative approaches to improve services.**

Again, many respondents highlighted the need for **joint working across services and collaborative approaches** to improve services for homeless people. The Dental Health Services Research Unit (DHSRU) based at the School of Dentistry, University of Dundee, co-ordinates the Smile4life programme – the national oral health improvement programme for people experiencing homelessness in Scotland. They developed a health intervention, with three stages providing different levels of support to service users, based on their readiness to change their behaviour. They cited evidence that found that third sector bodies involved with Smile4life increased their likelihood of helping service users access dental care. The Smile4life intervention is still being promoted by strengthening links with practitioners from the NHS and third sector.

**The integration of health and social care was** considered a way of ensuring a multi-disciplinary approach to tackling disadvantage.

Other evidence of joint working between health and homelessness services was provided. South Lanarkshire Council reported that, working with NHS Lanarkshire, it had recently completed a **draft report on the health needs of homeless people.** This sets out what is known about homeless people’s health needs and includes an action plan with actions to be taken forward over the next 3 years. The actions include **improving access to screening programmes for homeless people** who may be moving around and not able to prioritise their health.

The Midlothian Health and & Homelessness Steering Group has been tasked with improving integrated work involving health and homelessness services. An action plan contains four main objectives. One of these is to review and improve health (and other health related) service provision to ensure it meets the needs of people and families who have experienced homelessness. Various projects are underway including the exploration of a patient pathway from the **Royal Infirmary of Edinburgh to local services to prevent homelessness** should hospital staff become aware that a patient’s living situation is unstable. The steering group are at the midpoint position their work and are happy to update the Committee on their findings and recommendations from their projects in the autumn.

- **Other suggestions for improving homeless persons access to health services**

A range of other points about how health services for homeless people could be improved were made. These included:

- **Co-location of services** e.g. mental health services sited within the housing teams can achieve better outcomes.
- **More flexible appointments schedules** and different ways of approaching services was suggested (Simon Community and North Ayrshire Council).
- **Homeless people are included in all screening programmes** (Cervical/Bowel/mammogram’s etc.) This needs to be brought into temporary accommodation to ensure the opportunity is not missed (North Ayrshire Council).
- **Every homeless household should be registered with a GP as a priority on book in to temporary accommodation** (North Ayrshire Council). More local GP surgeries should take temporary patients (Scottish Women’s Aid).
- **Direct access referrals into Mental Health and Addiction services** with named staff working jointly with Housing Support staff to plan recovery pathway. (North Ayrshire Council). Build confidence in voluntary sector staff refereeing to mental health services (Cyrenians).
- **Services to allow access to health care for migrants.**

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

The housing first model is being operated, or being piloted, in a number of areas in Scotland. Turning Point Scotland currently operates housing first services in Glasgow (the most mature project), Renfrewshire, and East Dunbartonshire. Falkirk, North Ayrshire Council were operating housing first type models. South Lanarkshire Council were using the key principles of housing first in their mainstream services, rather than commissioning a specific service. Angus Council is considering a housing first approach for people leaving prison and care leavers assessed as ready for living independently.

- **There are benefits of housing first**

  A number of respondents (e.g. Simon Community, CJVSF, Homeless Action Scotland, and Dr Burley) said that there is evidence that the principles of housing first provide the best sustainable outcomes for homeless people multiple and complex needs.

  The Glasgow Homelessness Network referred to a presentation from Professor Sarah Johnsen from Heriot-Watt University at a recent event which outlined the growing body of international evidence supporting the provision of housing first as a way of circumnavigating the complex system of accommodation and support that currently exists. They also pointed to research\(^6\) found that Housing First shows a greater degree of efficacy where there is a higher level of fidelity to the original pathway model in New York.

- **Housing first should be part of a range of support**

  Some respondents indicated that housing first would only be suitable for a relatively small number of people. For example, Aberdeen City Council said

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\(^6\) Goering et al (2015) *Further Validation of the Pathways Housing First Fidelity Scale*
currently only about 20 to 30 clients would meet the criteria for this approach. They said the “Pure Housing First” model would only be cost-effective for this group. They are currently reviewing their homelessness strategy and examining how they can use the same principles to create a housing led approach (Housing First “Lite”) for all people who are experiencing homelessness as this is where the most impact and positive outcomes could be achieved.

While supporting the housing first model others said that it was not the only answer and there was a need for a range of accommodation types with appropriate support (e.g. ALACHO, Homeless Action Scotland).

- Housing first can be resource intensive but can provide cost savings

The intensive support and associated costs of housing first was noted. North Lanarkshire Council said that the housing service was not in a position to fund the housing support and health and care support costs likely to be necessary in many cases. Pooled budgets and agreed priorities and the close working of other relevant services could make housing first more likely to succeed.

Homeless Action Scotland pointed out that very often the savings to the public purse from housing first benefit budgets which do not directly fund it (community justice, health etc.). They stated that a sustainable funding stream needs to be found to enable this approach to be mainstreamed. Cyrenians had concerns that the appropriate support requires a long term relationship to be built between a service and the person who is being supported and that current commissioning practices do not allow for support to be provided for more than a few months. Dr Burley also noted that joining up budgets and involving health in the provision of care in a housing first setting would go a long way to integrating the two key elements of health and housing

- Scope for the future development of housing first

Some respondents mentioned work that was ongoing to support the development of housing first. Turning Point Scotland stated that it is part of the FEANSTA European Housing First Hub. As part of a work stream, led by Crisis UK, they are considering the structural issues in relation to the scaling up of housing first. They said that they would welcome the Scottish Government using existing policy networks to embed a housing first approach as a default mode of choice for those with multiple and complex needs across Scotland

Crisis stated that it is conducting a feasibility study in the Liverpool City Region to look at the cost benefits of housing first and the transitional costs of moving away from the current system. The study has been funded by DCLG\(^7\) and the European Housing First Hub. ALACHO and Crisis also said that there should be a national programme of rolling housing first out for all those that can benefit from it.

\(^7\) UK Government Department of Communities and Local Government
Glasgow Homelessness Network (GHN) referred to a programme of work it was leading funded by the Scottish Government/ESF Social Innovation Fund. This will see key partners come together throughout 2017 to ensure that Scotland moves towards housing first becoming core, rather than peripheral, to a crisis response. They argued for the need to put the principles of Housing First into practice and scale up quickly.

**Rough Sleeping**

13. 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?

14. What type of accommodation is offered to rough sleepers?

15. What type of approaches can contribute to the reduction of rough sleeping and achievement of sustainable housing solutions for rough sleepers?

- There is a lack of an accurate evidence base on rough sleepers

Respondents noted the lack of an accurate evidence base on rough sleepers (e.g. SOLACE, Shelter). Many rough sleepers may not approach their local authority so will not be recorded in the official HL1 statistics (Homeless Action Scotland). SOLACE said that rough sleeping should not be confused with street begging.

Scottish Women’s Aid and Engender pointed out that women’s homelessness remains largely invisible. The particular challenges women face from rough sleeping e.g. increase danger of sexual harassment, and women’s avoidance of night shelters because of safety concerns meant the a focus on rough sleeping and night shelters are contexts where women are unlikely to be present and therefore not counted (Scottish Women’s Aid) It was suggested that rough sleeping is more an issue in cities particularly Glasgow and Edinburgh (e.g. SOLACE).

Youthlink Scotland stated that their members report that rough sleeping is generally experienced by young people with no recourse to public funds. These young people need support to get into employment and then to access private rented shared accommodation.

- Rough sleeping is not a big problem /or is declining in some areas.

Some local authorities reported that rough sleeping was not a big issue in their area or that the pattern had not changed in recent years (e.g., South Lanarkshire, Fife, Angus and Aberdeenshire Councils).

Falkirk Council said its number of rough sleepers had decreased due to a dedicated Rough Sleepers support officer and funding/close working
arrangements with their local soup kitchen and town centre retailers to ensure that they are aware of any possibility of rough sleeping.

The City of Edinburgh Council said that the number of homeless clients who have slept rough the night before has decreased from 368 to 114 in 16/17 showing a significant decrease. This reduction is also confirmed by the number of homelessness clients who have slept rough in 3 months before presentation reducing from 571 in 12/13 to 237 in 16/17.

- There is evidence that rough sleeping is increasing in some areas.

Homeless Action Scotland is currently conducting a second survey of rough sleeping. They recognise that there are different cohorts within the rough sleeping population (regular rough sleepers, sporadic, ‘one off’, people without recourse to public funds, people who ‘sofa surf’ etc.). Their response contains some initial findings including that, there is an obvious rise in visible rough sleeping and there are several groups of people sleeping rough creating "communities" of rough sleepers. In Edinburgh, there is an increase in groups of EU nationals (particularly Eastern Europeans). In Glasgow, people don’t want to approach the council as they don’t think there’s any point. Their view was that to tackle rough sleeping effectively, different groups will require specific targeted action.

Despite the official statistics in Edinburgh showing a decline in rough sleeping other agencies working in Edinburgh pointed to evidence of increased rough sleeping in the city. For example, Bethany Christian Trust said that demand for their care shelter in Edinburgh had risen dramatically in recent years. They set out a number of possible reasons for the increase in Edinburgh, as distinct from core reasons for rough sleeping, which relates to a more complex set of factors. Some of the reasons include insufficient temporary accommodation spaces available at the presenting point of need and how the council organise the accommodation. Their response emphasised the excellent joint work the council senior management and Bethany management have been engaging in to consider potential solutions.

Glasgow Homelessness Network made comments in relation to rough sleeping in Glasgow. Despite previous successes in tackling rough sleeping, they suggest that the recession and welfare reform has brought new challenges. Their recent measurement of rough sleeping has shown an upward trend over the last 4 years. An absolute minimum of 1,408 individuals were recorded as having slept rough in Glasgow at least once in 2016-17; the majority of whom are white, Scottish men in their mid-20s to mid-40s. They cite a number of local factors that contribute to this rise including that the local authority is regularly not discharging its statutory duty to accommodate (although they note there is work ongoing with housing partners to seek a solution to this). Furthermore, they state that some people chose to sleep rough, rather than take up accommodation offered to them to avoid

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8 Their work to understand the rough sleeping in the city is part of a partnership approach with other organisations including the Marie Trust, Glasgow City Mission, Simon Community Scotland, Lodging House Mission, Turning Point Scotland, Glasgow Winter Night Shelter – with academic support from Heriot-Watt University and University of Glasgow.

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challenging environments. Broader factors like poverty and inequality also affect Glasgow more acutely than other areas.

The Legal Services Agency, whose office is based in Glasgow, considered that the number of rough sleepers has soared. They state that these people are younger and there appear to be many more young women than was previously the case. This group appear to be very vulnerable. They also noted a significant number of people who have been granted refugee status engaging with their homelessness service.

Govan Law Centre noted the linkages between mental health problems and rough sleeping. Their submission provides case study evidence of clients with mental health difficulties who have slept rough.

- **A range of support is available for rough sleepers**

Respondents noted that a range of support is available for rough sleepers. For example, Fife Council provides some hostel accommodation. North Ayrshire has some supported hostel accommodation or dispersed furnished accommodation.

Examples of particular projects to support rough sleepers were provided. Cyrenians referred to its Homeless Navigator Project in Edinburgh, funded by Comic Relief. The project aims to offer an alternative opportunity for people who are experiencing homelessness and cannot make use of the current support services that exist in Edinburgh. It offers a peer support service, delivered by someone with lived experience of homelessness. It is deployed as a walking tour around Edinburgh in order to form supportive relationships with people and increase their uptake of services such as Housing, Health, Employability and Substance Misuse.

- **Solutions to rough sleeping**

Respondents made a range of suggestions for developing solutions to rough sleeping. These included:

- **Mental health and health services need to play a larger part in the solutions** (Homeless Action Scotland, Govan Law Centre, Cyrenians) Each homeless caseworker who has concerns regarding a person with mental health must record this and make the referral to mental health services. All rough sleepers should be given a full mental health assessment and support to enable them to be accommodated and support to maintain their tenancy once they are accommodated (Govan Law Centre)
- There is a need for more outreach support.
- Refugees need to be given appropriate support and advice.
- A person centred approach with multi-agency involvement should be developed (Scottish Women’s Aid Falkirk Council)
- Building relationships with clients, and peer support (Falkirk Council)
- Provide support for people with no recourse to public funds (North Lanarkshire Council)
- A fair welfare system (North Lanarkshire Council)
Understand the needs of people at risk and support people who have fear of hostel provision, shared living or independent living (North Ayrshire Council)

Alternative innovative additional emergency accommodation options should be considered e.g. a council commissioned one night stay hostel for otherwise rough sleeping individuals; a purpose designed venue with showers, medical and cooking facilities, etc. (Bethany)

16. What are the reasons behind why people become homeless?

Many different reasons were cited for why people become homeless. Some respondents outlined the reasons given in the Scottish Government’s ‘HL’ homelessness monitoring forms, in particular relationship breakdown.

Other respondents mentioned wider structural factors such as poverty which has been exacerbated by social security reforms. The lack of choice in the housing system was also referred to, for example because of high costs of renting or because of lack of particular house sizes available (City of Edinburgh Council, Fife Council).

ALACHO stated that homelessness is a systems outcome i.e. an inevitable result of the way the housing system works, rather than an “event” that happens to the poor and unfortunate.

Some respondents mentioned that homelessness was a consequence of long term issues such as mental health, past trauma and disadvantaged childhoods (e.g. Simon Community, Rowan Alba, Action for Children). North Ayrshire Council indicated they were now experiencing second and third generation homelessness as the trauma and often-chaotic lifestyle of parents impact on children.

Other risk factors to homelessness were mentioned, when people leave prison or leave care (Advisory Group at the Life Changes Trust). The Scottish Care Leavers Covenant noted that for care leavers accessing and maintaining accommodation can be very challenging for a number of reasons. For example, many care leavers have complex backgrounds and often limited supports which impact significantly on their vulnerability. Furthermore, they move on to live more independently at a much younger age than the rest of the population when they are least equipped to do this successfully.

Refugees and asylum seekers were also pointed out to be at risk from homelessness. The Scottish Refugee Council said that once granted refugee status, refugees have 28 days in which to find accommodation and financial support (after being living in home office funded accommodation during their period seeking asylum). Often this means that refugees rely on local authorities to accommodate them under homelessness accommodation. COSLA and Scottish Refugee Council both referred to their recent evidence to the Scottish Parliament’s Equalities and Human Rights Committee inquiry on Destitution, Asylum and Insecure Immigration
Status in Scotland. COSLA said it was worth continuing to explore how housing support to refugees and asylum seekers can be enhanced.

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

Most respondents who answered this question referred to the monitoring forms that local authorities provide to the Scottish Government which forms the basis of their statistical reporting on homelessness, i.e. the ‘HL1, and ‘PREVENT1’ forms. Mention was also made of other local authority level monitoring such as performance management information (Angus Council) and GIS mapping used to pinpoint high levels of homelessness (Falkirk Council).

A few comments were made about the potential scope for improvement. The inconsistency in the recording of the PREVENT1 returns and the difficulty of establishing any trends were noted (Angus, North Lanarkshire Council).

A couple of responses indicated that more qualitative information would be useful (e.g. East Lothian Council, Simon Community). COSLA said that the statistics are not a useful indicator of success in homelessness interventions and they would welcome a conversation with Scottish Government about a more outcomes-based approach. Engender said that the data collected by the Scottish Government focuses on reasons why people are homeless e.g. termination of tenancy but the reasons are an outcome – or a by-product – of a larger crisis in Scotland: inequality.

18. Can you give examples of best practice of effective strategic co-ordination of services to ensure there are no gaps or overlaps in homelessness services?

There were relatively few specific responses to this question, perhaps because co-ordination related issues were raised in response to other questions.

Some respondents mentioned service review processes that had been carried out. For example, Falkirk Council has reviewed its front line service delivery approach and has developed a hub model to provided dedicated services to vulnerable citizens.

Echoing points made in response to other questions, the need for partnership working was noted. For example, in North Lanarkshire the 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 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.
19. Are there any problems with people accessing their housing and homelessness rights? If yes, how can access be improved?

Some local authority respondents highlighted how they provide advice to homeless/potentially homeless people (e.g. Falkirk, Angus Councils). Fife Council homeless applicants are advised of their rights at the assessment stage and applicants are advised of the appeals process. They also fund a voluntary sector partners to provide tier 3 advice which includes advocacy type work to assist homeless applicants. North Lanarkshire Council highlighted the need for a good rapport and relationship between the applicant and adviser so that all relevant information is disclosed and people get the services they need.

- Some people have problems accessing their homelessness and housing rights

Other respondents suggested there was a problem with people accessing their housing and homelessness rights and people could only do this with the support of an advice agency (Govan Law Centre, Shelter Scotland, Legal Services Agency, Big Lottery Fund, Crisis). Concerns about “gatekeeping” were raised. Govan Law Centre, for example, argued there was a systemic failure with many local authorities throughout Scotland. They highlighted their key areas of concern where people were not getting the assistance the legislation provides for:

- Local authorities fail to take a homeless application
- A local authority takes a homeless application but does not fulfil their statutory duty by offering interim/temporary accommodation whilst a full investigation is undertaken
- A local authority does not offer temporary accommodation to people while they are referred back to other local authorities.

The Legal Services Agency also referred to gatekeeping in terms of rough sleepers not being provided with temporary accommodation they are entitled to. A staff member from Women’s Aid noted the good working relationships in Edinburgh but there was a concern that housing staff would often give out incorrect information to service users. There could also be problems sharing information between relevant agencies. Shelter Scotland said the Scottish Housing Regulator has a role in ensuring that all local authorities and RSLs are complying with their statutory duties at all times.

The evidence from the Big Lottery Fund in Scotland contains a case study from Street Legal (funded by the Big Lottery) which is a partnership project between Clan Childlaw (community law advice network) and Streetwork (a charity that works with homeless people in Edinburgh). The project delivers legal advice and representation to young people between 16 and 26 years old who are homeless and at risk of homelessness. Street Legal said that they uncovering issues with issues arising from the implementation of the Children and Young People (Scotland) Act 2014. The intention of the Act is that care leavers receive the same support and care as
those living with their families. However, they argue that many care leavers are not receiving the assistance they need, are not being listened to and are being diverted into adult services. They also argue that there is **little awareness for care leavers and those working with them of care leavers rights and how to challenge them.**

Similarly, the Scottish Care Leavers Covenant highlighted that in practice the responsibility for requesting support under the Children and Young People Act 2014 can remain with the young person. They stated that it is **critical that young people up to the age of 26 are aware of their rights and entitlements and are provided with appropriate support to access services.** They said that while the policy and legislative landscape in Scotland provides an enabling context to eliminating homelessness for looked after young people and care leavers, they still had concerns that the full implementation of policy into practice exists only in pockets.

- **Suggestions for improvements in information provision about housing and homeless person’s rights.**

Various suggestions were made. These included:

- Provide **systematic information including** options open to homeless people and where to access these rights (Legal Services Agency).
- **Publicise advice agencies** (Legal Services Agency).
- **Housing officers should provide correct advice first time so time would be freed up to assist women on their recovery** (individual Women’s Aid worker)
- **Improve Digital Access** (Legal Services Agency, Salvation Army)
- **Awareness-raising for young people** in regards to their rights and services available, with information on each protected characteristic and specific barriers and experiences (LGBT Scotland)
- **Standardised wording on local authority websites** (Homeless Action Scotland)
- **Make public services accessible and proactive** (COSLA)
- Back the establishment of a **statutory funded holistic asylum advocacy service, which is a tangible prevention approach to the destitution of those seeking or granted protection** (Scottish Refugee Council)

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

Many of the points made here echoed points made in response to previous questions. A range of barriers to providing sustainable housing solutions were cited. These included:

- **Stock availability of a suitable size and type for the household**
- **The impact of welfare reforms** (Falkirk, Fife, Angus Councils)
- Households with **multiple and complex needs that are not being met**
- **Difficulty of households accessing the private rented sector** (North Lanarkshire, Angus Council)
- Particular issues faced by prison leavers, e.g. payment of housing benefit (CJVSF)
- A higher instance of RSLs in Glasgow asking for one month’s rent in advance. This creates a financial obstacle particularly for those who are on benefits; often service users are forced to ask family or friends to loan them money to enable them to pay this (Turning Point Scotland)
- The gradual erosion of council funding and the impact this has on services, particularly preventative services (COSLA).

In terms of addressing such barriers again, responses echoed points previously made, for example; increasing housing supply, a welfare system that supports vulnerable people tenancy sustainment support and the right support for particular health needs.

21. Are there any other issues relating to homelessness which you wish to bring to the attention of the Committee?

Some of the responses made to this question reinforced many of the themes that have been identified above. Additional points made included:

- No recourse to public funds applicants has a significant strain on local authority budgets (Falkirk Council)
- The importance of political and strategic leadership and governance (COSLA, North Lanarkshire Council).
- A new national homelessness strategy should be developed (Shelter Scotland)
- Need to ensure people with lived experience of homelessness are involved in responses to homelessness (Glasgow Homelessness Network)
- Clearer strategic approach for the groups and activities going on a national and local level discussing ways to tackle homeless, possibly through Housing Options Hubs (South Lanarkshire Council).
- The needs of children affected by homelessness are significant but often not recognised or met. Homelessness should automatically be classed as a significant event for a child and a wellbeing assessment for any child affected by homelessness should be completed. The provision of services to support children affected by homelessness may be significantly more important than the length of time families spend in temporary accommodation (South Lanarkshire Council)

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