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INTRODUCTION
Shelter Scotland is Scotland’s national housing and homelessness charity. We
are here so that no-one has to face bad housing or homelessness on their own.
Our vision is of a home for everyone in Scotland. For nearly 50 years, the way
we have sought to drive change has remained the same: we advise and support
people in housing need today and use the insight we gain from this work to
inform our policy, research and campaigning activity to help drive change for
tomorrow. We also help to raise professional standards for those working in
Scotland’s housing and homelessness sector by offering a broad range of
training and e-learning courses for professionals.

Our Homelessness: Far From Fixed campaign, launched in September 2016,
sought to put homelessness back on the national agenda and called for renewed
national vision and leadership on homelessness in Scotland. In this context, we
very much welcome the formation of the Scottish Government’s new
Homelessness and Rough Sleeping Action Group and hope that it can quickly
move to deliver the changes needed on the ground for those facing or at risk of
homelessness in Scotland today.

Last year Shelter Scotland helped over 21,000 people with housing and
homelessness problems across our housing and homelessness advice and
support services in Scotland. In addition to our free national helpline, free housing
law service and free online Get Advice pages (which received over 830,000
unique visits in 2016/17), Shelter Scotland also operates out of four Community
Hubs in Glasgow, Edinburgh, Aberdeen and Dundee as well as providing housing
support services in Dumfries and Galloway, South Lanarkshire and in
Renfrewshire.

This paper builds on our established practice and policy insight as well as the
experiences of our clients and service users and summarises our key
recommendations for action to better tackle and prevent homelessness in
Scotland today.
HOMELESSNESS CONTEXT

Although it is the most visible and the most tragic form of homelessness, rough sleeping is just the tip of the iceberg of Scotland’s homelessness challenges. It is vital that any recommendations for meaningful action on homelessness are done so in recognition of the full picture of homelessness in Scotland today and in line with original intentions of the world leading Homelessness (Scotland) Act, passed in 2003 with cross-party support in Holyrood, giving all unintentionally homeless people in Scotland the right to a home.

Homelessness figures (2016/17)
- 34,100 homelessness applications
  - 46% were single male households
  - 21% were single female households
  - 17% were female single parents
- 28,247 homelessness assessments
- Young people are over-represented in homelessness numbers: 15.1/1000 of under 25s applied as homeless in 2016-17 - much higher than the rate of homelessness for 25-59s, which is 9.4/1000

Reasons for homelessness (2016/17)
- 25% of homelessness applications were because someone was asked to leave accommodation
- 18% due to dispute within a household or relationship breakdown (non-violent)
- 12% due to dispute within a household (violent)
- 11% due to action by landlord or lender
- 6% due to leaving prison, hospital or care
- 26% were for “other” reasons which include harassment, loss of accommodation tied to employment, an emergency such as a fire or flood, and overcrowding, among other reasons

Temporary Accommodation in Scotland (as of 31 March 2017)
- 10,873 households in temporary accommodation in Scotland
- 2,852 (26%) of these households were living in bed and breakfast hotels and hostels
- 6,041 dependent children living in temporary accommodation across Scotland
- 24 weeks was the average time spent by households in temporary accommodation in 2015-16

Recognising the full scale and structural drivers of homelessness is vital. As such, Shelter Scotland would strongly oppose any efforts to redefine homelessness in Scotland to narrow the scale of the challenge and action required. For the Action Group to begin its work by adopting a redefinition of the problem which it has been convened to address would threaten to undermine the credibility of the Group.
**THE HOUSING SAFETY NET**

The ‘housing safety net’ (HSN) is a term used by Shelter Scotland and other organisations to describe the range of government support to help households access suitable housing and avoid homelessness. It is comprised of three core elements:

- Social housing
- Homelessness prevention and alleviation
- Housing benefits

At a UK-wide level, research from Shelter England shows that a quarter of all households receive some support from the housing safety net. More households receiving housing support have one or more working adults than 10 years ago. 1 in 10 of those receiving help need additional support and are failing to meet their basic living costs. 1 in 4 of all households receiving help continue to pay unaffordable housing costs.

This is also borne out by our experience in Scotland. Last year “Struggling to afford or pay housing costs” was the single largest dominant presenting problem from all those that came to Shelter Scotland for help. Issues relating to the affordability of keeping a home was a top presenting issue across our clients from all housing types (PRS, social sector and home owner). In addition, research from April 2017 shows that 95% of all social evictions in Scotland in 2015/16 were due to rent arrears. The increasing un-affordability of housing in Scotland is a growing issue that is directly linked to homelessness.

Social security cuts linked to the UK Government’s welfare reform agenda (Local Housing Allowance freeze, benefits cap, reduction of 18-21 year olds’ Housing Benefit entitlement, bedroom tax etc.) and the problematic roll out of Universal Credit are driving demand for limited homelessness services in Scotland and young single people are bearing the brunt of the cuts and changes.

This has led to an evolving role for Discretionary Housing Payments in Scotland (DHP) which is increasingly functioning as the safety net below the safety net, to provide a catch-all response for the flaws in the UK-wide welfare reform agenda.

**ACTIONS**

Ensure the pledged 35,000 homes for social rent are built in the right locations, where people want to live, to best meet local need.

Support the campaign to halt the roll-out of Universal Credit to fix the significant problems in the delivery system.

Use Scotland’s new social security powers to mitigate the housing benefit cuts for 18-21 year olds.

Support calls for the UK Government to lift the LHA freeze.

Realise the ambition to more formally abolish the “bedroom tax” in Scotland.
TEMPORARY ACCOMMODATION

Temporary Accommodation (TA) is a vital lifeline for vulnerable households and is the cornerstone of Scotland’s world leading response to homelessness. We need to ensure that this accommodation is good quality and affordable, especially for working households, and that there is a clear plan for moving on from temporary accommodation for every household.

Standards in TA
We know from our clients’ experiences that the quality of temporary accommodation can vary significantly across Scotland. Currently there is no formal guidance on standards for TA in Scotland. CIH Scotland and Shelter Scotland have been calling for formal guidance on TA standards since 2010.

Time spent in TA
More and more households are spending far too long in temporary accommodation, which is directly linked to the need for more affordable housing available for social rent. Shelter Scotland annually assesses the length of time households in Scotland are spending in TA. Our most recent report is from February 2017, looking at the length of time households spent in temp in 2016:

- On average in Scotland households using temporary accommodation in 2016 stayed there for 24 weeks (compared to 18 weeks in 2014 and 23 weeks in 2015)
- 32% of households spent over 6 months in TA (compared to 25% in 2014 and 33% in 2015)
- 12% of households spent over a year in temporary accommodation (compared to 10% in 2014 and 2015)
- Households with children spent a median time of 20.1 weeks in TA (up from 17 weeks in 2014 and 17.8 weeks in 2015). This was higher than the median for households without children which was 13.5 weeks.

Funding for TA
From April 2017 changes to housing benefit mean it will no longer pay for the management cost of temporary accommodation. ALACHO estimate that the resulting projected funding shortfall for TA is in the region of £60million (nearer £40million after distribution of grant).

ACTIONS
A detailed review of the funding and purpose of TA in Scotland, leading to a new model that is not solely reliant on the levels of Housing Benefit or UC.

Scottish Government should consult on and introduce formal guidance on standards in temporary accommodation.

Using HL3 statistics, analyse data on length of stay in TA to develop a strategic approach for reducing the length of time in TA (where appropriate for households).

B&B accommodation should not only be considered unsuitable for pregnant women and children but also highly vulnerable people.
FUNDING FOR HOMELESSNESS SERVICES

In August 2016, Shelter Scotland commissioned Anna Evans Housing Consultancy to undertake qualitative research into the sources and trends of Scottish Local Authority homelessness services funding. The work involved consultation with 15 local authorities to understand how the context and reality of funding homelessness services has changed in recent years and to understand the challenges faced, and examine possible solutions, to put the funding framework of homelessness services on a more stable footing.

The research found that in recent years Local Authorities have realigned their homelessness services from an entitlement led response, to a Housing Options approach, emphasising prevention and early intervention. Official homeless applications have reduced in recent years, however the footfall of clients to LAs has increased. Many of the Local Authorities consulted predicted increasing demand to local homelessness services, partly in anticipation of the impact of new Housing Options guidance, in the coming years.

The research highlighted a primary challenge for Local Authorities, and implications for the long-term sustainability of services: whether to continue holding homelessness services on the Housing Revenue Account, and face significant financial risk, or whether to transfer to the General Fund for these services, in the context of potentially reducing resources from this source in the future.

Comparing trends in findings from this work in 2012 and 2016, there is greater proportional funding coming from the General Fund for Local Authority homelessness services. There is also a reducing amount of specific ring-fenced homelessness grants and funding streams from Scottish Government. This would seem to have had a significant impact on the way local authorities procure services, with a rise in time limited and conditional services, which does not best meet the needs of more complex homeless households and individuals.

**ACTIONS**

Audit Scotland should consider conducting a review of housing and homelessness advice and support services in Scotland.

To better understand the cost of homelessness services, and value for money considerations – there should be a clear break down from Local Authorities in costs by advice and assistance, and temporary accommodation, with transparency around costs relative to services provided.

Establish national benchmarks on quality, costs and charges for Local Authority homelessness services.

Scottish Government should seek to stimulate innovation in the sector and explore a wider range of funding methods, and to use its powers to mitigate against the difference there may be between the cost and affordability.
TACKLING SOCIAL SECTOR EVICTIONS

There is currently a worrying rise in the number of social sector evictions in Scotland. In April 2017, Shelter Scotland published our analysis of trends in evictions by social sector landlords, covering 2012 – 2016.

Key findings from this report included:

- In 2015/16, local authorities issued 25,956 notices of proceedings, took 8,871 cases to court, were granted 3,994 decrees for eviction and carried out 1,300 evictions.
- Since 2013/14, the number of cases taken to court increased by 24%, the number of decrees granted by 46% and the number of evictions by 41%.
- In 2015/16, local authorities issued 2,332 more notices of proceedings than in 2013/14.
- Registered social landlords (RSLs) have also seen an increase in eviction actions, although at a slower rate of increase than local authorities. In 2015/16, RSLs issued 11,630 notices of proceedings. They also took 4,209 cases to court, were granted 1,607 decrees for eviction and carried out 830 evictions in 2015/16. Compared to 2013/14, this represents an increase of 15% in decrees granted and of 5% in evictions.
- Most eviction actions are in response to rent arrears. For local authorities, they account for 95% of all evictions, while they account for 89% of evictions by RSLs. Only 6% of all social sector evictions are the result of anti-social behaviour.

Shelter Scotland believes that the increased use of eviction action by RSLs and local authorities may be a response to changes to social security, which have been reflected in changes to rent arrears management.

ACTIONS

The Scottish Government in partnership with ALACHO, COSLA and social landlord bodies, should renew its focus on preventing eviction of tenants for rent arrears.

The Scottish Housing Regulator should consider the performance measures it uses in this area to monitor LA and RSL activity to focus on tenancy sustainment and prevention of homelessness.

Best practice in managing rent arrears and minimising the use of costly and often ineffective eviction actions should be identified and shared within the sector.

Social landlords and the Scottish Government should work together to promote alternative courses of action to avoid eviction.
SUPPORT FOR PRISONERS AND PRISON LEAVERS

It is well documented and widely accepted that spending time in prison increases an individual’s chances of becoming homeless. Prisoners who have problems securing accommodation on their release are significantly more likely to reoffend than those individuals who do not face these challenges.

This assertion is borne out through official statistics which show that in 2016/17, 6% of statutory homeless applications in Scotland came from people leaving prison, hospital or care - a significant over representation against national demographics. In addition, in 2014/15 30% of those released from prison did not know where they were going to live on their liberation. Two thirds of those who were homeless after their release from prison would go on to reoffend. Research has shown a reduction in recidivism of as much as 20% for those who had stable accommodation on their release compared to those who do not.

These stark figures are set against a current average prison population of around 7,500 in Scotland, but an annual liberation rate of nearly 20,000, due to a large proportion of prisoners being in custody for short periods of time. Of those that are liberated, one third have served less than 12 months and 44% are released from remand. Of the 19,792 prisoners liberated in 2011-12, 8,787 had been on remand and 6,548 were sentenced to less than a year. Due to the short period in custody there is less time to engage with support agencies and evidence has shown that these groups are even more prone to homelessness.

However, analysis taken from direct interviews and outcome reports with clients of Shelter Scotland’s Supporting Prisoners Advice Network in 2015 showed definitively that it was possible to keep their home during time in custody and, thus, to be prevented from becoming homeless. Unfortunately, there is currently no national second tier housing advice service for Scotland’s prisons.

ACTIONS

In conjunction with Community Justice Scotland and the Scottish Prisons Service, the Scottish Government should implement the recommendations from its own report into Housing and Reoffending (Jan 2016) with a specific focus on the first recommendation around ensuring consistent housing support is available for all prisoners.

When considering a homeless application from a prison leaver, local authority staff should consider applicants that would not usually be considered to have a local connection as a ‘special circumstance’ understanding that they are likely to have a good reason for applying to that area.

Wherever possible, local authority homelessness teams should avoid placing prison leavers in hostels as temporary accommodation.

The Scottish Government should look to endorse the forthcoming SPS led report on Sustainable Housing on Release for Everyone (SHORE) and ensure future recommendations for tackling homelessness amongst ex-offenders align with its findings.
COMPLEX NEEDS HOMELESSNESS

We are aware that Local Authority homelessness services are supporting a greater number of people with complex needs. Currently, however, there is no Scotland-wide official definition or consistently applied understanding of exactly what “complex needs” means across all relevant homelessness services and delivery agencies. As such, planned service responses for this group can differ widely. Shelter Scotland commissioned research into complex needs practice in the Housing Options East Hub found that a linear approach focusing on specific single needs dominated service provision.

Interviews from this work evidenced that service providers are aware of what would be more effective for working with people with complex needs. They understand that relationships work and that service users have psycho-social problems linked to a past of complex trauma that, if addressed, will enable better engagement with other interventions. Currently, however, the way that many statutory services are structured and set up can constrain the relationship building process that is needed for engagement and recovery.

There is increasing recognition of, and concern for, the most vulnerable homeless people who have multiple and complex needs and the large overlap between this group and those that sleep rough. It has been shown that general homelessness services are not often designed to meet the needs of this group and the Scottish Government has acknowledged that there is a need for outcomes for this group to be improved. As a well evidenced and internationally recognised response to better supporting homeless people with complex needs, the Housing First approach has an important role to play in meeting the needs of this group. However, it is not a silver bullet for all homelessness problems and would take significant investment and a sustained commitment over many years to meaningfully deliver at scale in Scotland.

**ACTIONS**

Develop a common definition of what complex needs means among service providers from the public and voluntary sectors in Scotland (perhaps in line with “Chaos Index” used by Simon Community Scotland).

At a local level, single managers should be appointed to strategically coordinate the response to people with complex needs with a focus on an asset based, personalised response.

Local services should focus on peer support work and relational issues and the problems that underlie the presenting factors of ‘complex needs’ to allow for longer term engagement with these individuals.

The forthcoming Housing Options Training Toolkit should make available to local authority staff a resource around responding to people with complex needs.
PREVENTION & HOUSING OPTIONS

The Housing Options approach to early intervention with those in housing need and at risk of homelessness was introduced by the Scottish Government in 2010. Since then the Government has encouraged local authorities to apply the approach to their own local context and development has happened ‘from the ground up’. The forthcoming Housing Options Guidance and proposed training toolkit are both significant in the ongoing development of good practice in this.

However, Housing Options is not the same as a full system strategic approach to preventing homelessness in Scotland. Housing Options does not always respond adequately to the needs of all homeless people or every aspect of homelessness. It has been recognised that people with complex needs, including rough sleepers, can fall outside the scope of those helped by this approach and the focus on Housing Options has led to a lack of response to this highly vulnerable group.

Critical to homelessness prevention, successful Housing Options implementation - and all thematic areas for action identified in this paper - is well-resourced support for those experiencing homelessness. Good quality, expert support is vital for those with identified support needs but also those facing the limbo of temporary accommodation and importantly for those starting a new tenancy. It is vital that local authorities continue to prioritise prevention and support as a central pillar of their homelessness response.

Practice of Gatekeeping

In 2014 the Scottish Housing Regulator (SHR) published a thematic enquiry into the delivery of Housing Options. At the time, the SHR voiced concerns that rather than being a model of positive prevention practice, in some places Housing Options was being used to prevent households accessing their statutory right to homelessness assistance. This practice, known as “gatekeeping”, is in most cases prompted by a lack of availability of temporary accommodation stock.

Shelter Scotland frontline advisors are aware that this is still happening in some areas, with Glasgow City Council being of particular concern. When challenged with a threat of judicial review on individual cases, local authorities respond promptly and positively negating the need to continue to challenge in Court. As such, there has not yet been a case brought to successful judicial review to publicly highlight this poor practice.

ACTIONS

Consideration should be given to introducing a statutory prevention duty in Scotland, similar to that introduced in Wales. Our strategic resource focus must shift to genuine prevention of homelessness (with partners in Health, Education and Social Care) rather than efforts to better manage it.

Statutory guidance on preventing and responding to homelessness should be updated to dovetail better with the Housing Options Guidance and form a coherent body of formal guidance.

There should be a Ministerial led drive to eliminate the practice of gatekeeping resources and tackling the systemic challenges ongoing in certain local authorities in meeting their homelessness commitments.
FUTURE ROLE OF THE HOUSING REGULATOR AND THE HPSG

The Housing Minister has made public reference to his intention to refresh and reform the high-level Homelessness Prevention and Strategy Group (HPSG). Shelter Scotland fully supports this intention.

The HPSG needs to be reformed and refocussed to move homelessness policy in Scotland beyond the plateau that it has reached. Previously, the HPSG evolved from the ‘Joint 2012 Steering Group’, which itself had emerged from the ‘Homelessness Monitoring Group’ when the task at hand changed. Now is the time to continue this precedent, recognise that the response to preventing and tackling homelessness in Scotland needs to be reinvigorated, and evolve the group again. Without a step-change in leadership, accountability and direction for homelessness Scotland risks losing its world-leading status in responding to people in housing crisis.

Any refresh of this high-level group should align with the recommendations from the Scottish Government’s short-life Homelessness and Rough Sleeping Action Group along with the findings from the Scottish Parliament’s Local Government and Communities Committee inquiry into homelessness, to establish future priorities and work programme of the HPSG.

A vital part of ensuring the success of any renewed strategic approach to tackling and preventing homelessness in Scotland is to ensure that responsibility for setting the national vision as well as monitoring delivery and reporting on progress against any new vision and priorities sits with this Ministerial led group.

Linked to this, consideration should be given to constructively engaging with the future work programme of the independent Scottish Housing Regulator to ensure a joined-up approach to monitoring and reporting across emerging priority areas.

**ACTION**

Recasting of the HPSG in line with key recommendations from Homelessness and Rough Sleeping Action Group and Local Government Committee inquiry into homelessness, to provide strategic coordination, monitoring and reporting against a renewed national vision and targets for preventing and tackling homelessness in Scotland.

Ensure that a refreshed work plan for the HPSG includes structured engagement with the Scottish Housing Regulator, as the independent body tasked with monitoring Local Authority housing and RSL performance.
SUMMARY OF RECOMMENDED ACTIONS

This report is not an exhaustive list of everything needed to drive change on the ground to better prevent and tackling homelessness in Scotland today. Rather, it is a summary of initial actions for which there is an established evidence base informed by lived experience, research analysis and client testimony. The following is a summary of the recommendations for action made in this report.

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<tr>
<th>Action</th>
<th>Lead Driver</th>
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<tr>
<td><strong>General</strong></td>
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<tr>
<td>1. There must be no redefinition of what homelessness in Scotland means or any formal recategorisation that undermines Scotland's world leading approach to homelessness.</td>
<td>HRSAG / SG</td>
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<tr>
<td><strong>Protecting the Housing Safety Net</strong></td>
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<td>2. Ensure 35,000 homes for social rent are the right type of homes to meet demand and built in the right locations, where people want to live and work.</td>
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**Support for Prisoners & Prison Leavers**

| 19. | Implement the recommendations from the Scottish Government’s own report into Housing and Reoffending (Jan 2016) with a specific focus on recommendations around ensuring consistent housing support is available for all prisoners. | SG / CJS / SPS / Third Sector |
| 20. | When considering a homeless application from a prison leaver, local authority staff should consider applicants that would not usually be considered to have a local connection as a ‘special circumstance’ understanding that they are likely to have a good reason for applying to that area. | LAs / COSLA |
| 21. | Wherever possible, local authority homelessness teams should avoid placing prison leavers in hostels as temporary accommodation. | LAs |
| 22. | Scottish Government should endorse the forthcoming SPS led report on Sustainable Housing on Release for Everyone (SHORE) and ensure future recommendations for tackling homelessness amongst ex-offenders align with its findings. | SG / SPS |

**Complex Needs Homelessness**

| 23. | Develop a common definition of what complex needs means among service providers from the public and voluntary sectors in Scotland (perhaps in line with “Chaos Index” used by Simon Community Scotland). | SG / LAs / Third Sector |
| 24. | At a local level, single managers should be appointed to strategically coordinate the response to people with complex needs with a focus on an asset based, personalised response. | LAs |
| 25. | Local services should focus on peer support and relational issues and the problems that underlie the presenting factors of ‘complex needs’ to allow for longer term engagement with these individuals. | LAs / Third Sector |
| 26. | The forthcoming Housing Options Training Toolkit should make available to LA staff a resource for responding to people with complex needs. | SG / LAs |

**Prevention and Housing Options**

| 27. | Consideration should be given to introducing a statutory prevention duty in Scotland, similar to that introduced in Wales, to shift strategic resource focus onto genuine prevention of homelessness (with partners in Health, Education and Social Care) rather than efforts to better manage it. | SG / COSLA |
| 28. | Statutory guidance on preventing and responding to homelessness should be updated to dovetail better with the Housing Options Guidance and form a coherent body of formal guidance. | SG |
| 29. | There should be a Ministerial led drive to eliminate the practice of gatekeeping resources and tackling the systemic challenges ongoing in certain local authorities in meeting their homelessness commitments. | SG / SHR |

**Future Role of Housing Regulator and HPSG**

| 30. | Recast HPSG in line with key recommendations from HRSAG and Local Government Committee Inquiry, to provide strategic coordination, monitoring and reporting against a renewed national vision and targets for preventing and tackling homelessness in Scotland. | SG / COSLA |
| 31. | Ensure that a refreshed work plan for the HPSG includes structured engagement with the Scottish Housing Regulator, as the independent body tasked with monitoring Local Authority housing and RSL performance. | SG / COSLA / SHR |
Shelter Scotland helps over half a million people every year struggling with bad housing or homelessness through our advice, support and legal services. And we campaign to make sure that, one day, no-one will have to turn to us for help.

We’re here so no-one has to fight bad housing or homelessness on their own.

Please support us at shelterscotland.org

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