Dear Bob

The Scottish Government welcomes the extensive, wide ranging inquiry taken forward by the Committee and the subsequent report and recommendations. We recognise the significant alignment between the Committee’s findings and the recommendations made so far by the Homelessness and Rough Sleeping Action Group (HARSAG) we established in October 2017. The recommendations of the two pieces of work highlight the challenges we face and set out the action needed across national and local government in conjunction with other partners, to end homelessness.

I have highlighted the recommendations of the Committee in Annex 1 below in bold with paragraph numbers, followed by the Scottish Government response. Also attached at Annex 2 is the full list of recommendations from HARSAG on ending rough sleeping for good, which the Government have accepted in principle.

As the work of the HARSAG continues, more recommendations will be made which will impact on some of the Committee’s recommendations, for example on temporary accommodation. The Scottish Government is committed to eradicating rough sleeping, transforming temporary accommodation, and ending homelessness and I look forward to continuing to update the Committee on our future work.

Kind regards

KEVIN STEWART
Annex 1

Local Government and Communities Committee recommendations and Scottish Government response

27. The Committee acknowledges the range of causes of homelessness. Their complexity and interconnection makes it more challenging to reduce homelessness. In that regard a one-size-fits all approach to tackling homelessness cannot be taken and approaches to solving the problem need to be centred around individual requirements. We therefore welcome the ambitions of the Scottish Government to eradicate homelessness and rough sleeping.

28. The recommendations in this report are intended to support and inform the work of the Scottish Government, the Homelessness Prevention and Strategy Group, the Homelessness and Rough Sleeping Action Group and other relevant groups in realising their ambitions.

In responding to the Committee’s recommendations, and those published and forthcoming from HARSAG, I recognise that leadership from the newly re-energised Homelessness Prevention and Strategy Group, with additional membership (which I attended on the 28th March) and investment through the Ending Homelessness Together Fund of £50m will be crucial to taking the action required. Taken together this provides a strong framework for the transformational change needed to achieve our goals to eradicate rough sleeping, transform temporary accommodation and bring about an end to homelessness in Scotland.

To date, the HARSAG has focused on action needed to minimise rough sleeping over winter 2017-18 and to end rough sleeping for good. We will receive further recommendations from the Action Group later this year, which will focus on transforming the use of temporary accommodation and ending homelessness for good. Following the conclusion of this work, we will bring forward a programme of work to eradicate rough sleeping, transform the use of temporary accommodation and end homelessness. This programme of work will include the following elements, highlighted by the Committee and HARSAG:

- Significantly increase efforts on prevention for those most at risk of homelessness, including care experienced people, through improved multi-agency working and joined up approaches
- Shift to a model of rapid rehousing by default, including a scaling up of Housing First, and transforming temporary accommodation where it is still required
- Introduce new, evidence based models of outreach, support and access to accommodation for people rough sleeping or at risk of rough sleeping – supported by improved data collection and management systems
- Update the Code of Guidance on Homelessness and ensure legislation is as effective as possible in supporting and driving these changes
CARE EXPERIENCED PEOPLE

53. We are concerned that care-experienced people are disproportionately represented in the figures on homelessness, particularly given it is known that they are a high risk group.

54. We recognise that there is some evidence of good practice in relation to the support and Housing Options provided to those transitioning from care into adulthood. We heard, however, from the Life Changes Trust and care experienced people that pockets of bad practice still exist. It was worrying to hear that vulnerable young care-experienced people are being provided housing in locations they do not know, feel comfortable or safe in, and which left them vulnerable to negative influences and those who pose a threat to their safety and mental well being.

55. We were also concerned to hear that full implementation of the Children and Young People (Scotland) Act 2014 has not yet been achieved and that some public bodies were unaware of the rights of care leavers and their roles as corporate parents. We recommend that the Scottish Government investigates this as a matter of urgency and then confirms to us how it will ensure that all those with duties under the legislation are:
- providing the necessary support to young care leavers; and
- are working collaboratively to prevent homelessness amongst young care leavers.

56. We also request further information on how the Scottish Government will—
- work with local authorities to plan their provision of housing to ensure that there are appropriate housing choices available to care experienced people which recognise their existing community ties and support them to move into an area that they know and feel safe in;
- ensure that local authorities provide care experienced people with the relevant, person-centred and non-time limited support and the appropriate financial and crucial life skills, where necessary, to help them maintain and sustain their lives and housing;
- work with local authorities and the third sector to identify and address what care experienced people and the Life Changes Trust considered to be bad practice; and
- extend the Unsuitable Accommodation Order to ensure that care experienced people do not experience unsuitable accommodation for any longer than seven days, in line with the current approach taken with families.

We have a shared ambition to provide support to care experienced young people and I am aware of the challenges they face as they adapt to independent living. Developing and improving policies by responding to those with experience of being in care or providing care is essential to improving the overall and long term outcomes for care leavers.
Better experiences and lives for looked after children and care leavers can only be achieved through corporate parents working together, in partnership with children, young people and families, to promote their interests, uphold their rights, and safeguard their wellbeing.

The Scottish Government strongly endorses the intentions of the very much improved framework introduced by the Children and Young People (Scotland) Act 2014 and the opportunities offered through the independent Review of Care to help us better support our care leavers.

The 2014 Act contains a suite of ground breaking measures to improve outcomes and we are alive to the benefits of seeking continuous feedback for care experienced young people to improve all aspects of policy and implementation.

On the specific issue of preventing homelessness, I acknowledge that much more needs to be done to address practice and culture throughout Scotland today. We have made progress on addressing homelessness on leaving care, but we must ensure nobody leaves care into homelessness or into circumstances where homelessness is a significant risk.

HARSAG made a recommendation on ensuring plans are always agreed, or agreed as quickly as possible, to prevent homelessness for the groups who are predictably at highest risk of rough sleeping including people with experience of the care system or on leaving the care system.

HARSAG, which consulted with those with direct, personal experience of homelessness through a series of ‘Aye We Can’ events co-ordinated by Glasgow Homelessness Network, part funded by the Scottish Government. This was an important part of developing their recommendations, as it is only by listening to those who have experienced homelessness that we can develop better solutions. I myself have met a number of young people experiencing homelessness in recent months including the representatives of the Rock Trust, Aff the Streets and the LGBT Youth Commission.

The Scottish Government has accepted this recommendation in principle and will work with local authorities and partners to ensure standards are developed that will inform pathways for people leaving care to actively ensure they are not discharged into homelessness, taking a lead from similar work done for those leaving prison with the Sustainable Housing on Release for Everyone (SHORE) standards. In addition, the ongoing review of the Care System will be instrumental in identifying ways to better support people who experience care, including ensuring support is in place in ways that reduce the likelihood of becoming homeless later on. We will follow the progress of this work with interest to identify and build on connections.

IMPACT OF UKG WELFARE REFORM

68. We welcome the action taken by the Scottish Government and local authorities to mitigate the impacts of UK Government policies. Concerns regarding the impact of welfare reform and the roll out of universal credit, however, were a regular theme throughout the evidence we heard about the causes of homelessness. We acknowledge the work of the Session 4 Welfare Reform Committee and the Session 5 Social Security Committee in exploring many of these impacts in more detail than our inquiry has permitted.
69. We note the creation of the Homelessness and Rough Sleeping Action Group and the Ending Homelessness Together fund. But we seek clarification from the Scottish Government on the extent to which these will seek to mitigate the impact of welfare reform on homelessness, including details of any pilots as suggested by the City of Edinburgh Council.

70. In particular, we note that Glasgow City Council has undertaken to proactively identify those who may be impacted by the benefit cap so they can be offered more affordable housing. We recommend that the Scottish Government encourages other local authorities to undertake such a proactive approach, where appropriate.

71. We note that the Scottish Government has no formal role in monitoring whether the £22.5 million provided by the UK Government and distributed to local authorities will be adequate to cover the removal of management fees from temporary accommodation. It would, however, be prudent to have a national picture of the impact of this funding and we therefore recommend that the Scottish Government considers this approach.

We agree that, despite the £100million annual investment in support for those on low incomes, and direct mitigation of UK Government welfare cuts, substantial concerns remain about the damaging impact of the annual £4billion cut in welfare Scotland will face by the end of this decade. The Committee is right to highlight the negative impact Universal Credit (UC) which is pushing people into debt and rent arrears. The Committee will be aware of the Scottish UC choices, which give claimants more flexibility in how they manage their own finances, and ensures people have the choice of paying their rent direct to their landlord. However we remain concerned about UC and have repeatedly called on the UKG to halt the roll out and fix the fundamental flaws in this reserved benefit.

We continue to consider the impact of welfare cuts on homelessness. Whilst it is clear that reductions in housing support may increase the risk of housing crisis and homelessness, there is unfortunately not sufficient data to consider the impact in detail. We regret that the UK Government has not undertaken any assessment of the impact of its policies on homelessness. In respect of the benefit cap we are aware of the work being undertaken by a number of local authorities, including Glasgow City Council to proactively identify those affected by the benefit cap and signpost them towards support, including support through Discretionary Housing Payments. I wrote to all local authorities on 24 November to highlight best practice and encourage the sharing of expertise between local authorities.

Following the introduction of UC, the UK Government has transferred the management fee for temporary accommodation to the Scottish Government. In discussion with COSLA, a formula was agreed for distribution across all 32 local authorities. For 2017/18, £22.5 million was disbursed. This figure is £23.5 million for 2018/19. In this second year of the funding, we have committed to undertake a review of this funding to further understand how it has been used and if any change to the funding formula is required. This will develop a national picture of its impact as recommended by the Committee.
PREVENTING HOMELESSNESS AND THE “HOUSING OPTIONS” APPROACH

72. The Committee welcomes the evidence it received that the Housing Options approach has led to a decline in homelessness assessments. We are, however, concerned to hear that it may also be used to ‘manage’ resources and access to homelessness services.

73. We recognise that the flexibility offered by the Housing Options approach provides for local circumstances to inform local decision taking regarding homelessness applications. We seek clarification, however, as to how the Scottish Government reassures itself that the guidance has been implemented correctly and is combatting ‘gatekeeping’—that is, the practice of deterring someone from making a homelessness application.

Housing Options has led to a decrease in homelessness assessments. This is due to local authorities being able to respond earlier to people with housing queries and being able to prevent homelessness occurring or to look at all the options available to a person if homelessness is likely to occur, including making a homelessness application. The Housing Options Guidance sets out the legal position with regards to the interrelation of the housing options approach and the homelessness legislation.

The Scottish Housing Regulator has a role in terms of looking at any “gate-keeping” taking place across Scotland. Their report into Housing Options made clear its views on the relationship between the homelessness legislation and the housing options approach.

The Action Group has also recommended that the Scottish Government should consider the case for legislation around a prevention duty and we will be taking this forward.

ACCESSING INFORMATION ON HOUSING OPTIONS - TRAINING TOOLKIT

87. The Committee recognises that the development of the Housing Options toolkit could go some way to supporting more tailored support for those presenting as homeless or about to become homeless, albeit it has taken five years to develop and has yet to be launched. It is vital that the toolkit provides front-line staff with the full knowledge and skills to provide advice and support in all circumstances, including those with specific requirements, such as those with protected characteristics and gender-based violence.

88. We seek confirmation from the Scottish Government of:
• when the Housing Options toolkit will launched and what training and support will be provided on its use;
• how the Scottish Government will monitor and evaluate the toolkit’s effectiveness; and
• how often the Scottish Government will review the toolkit to ensure it remains fit for purpose.

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See www.lobbying.scot

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The Housing Options Training Toolkit has been in development for a number of years and is managed by a Steering Group comprised of representation from all five regional Housing Options Hubs. The lengthy timescales involved have largely been as a consequence of procurement rules which prevented the Housing Options Hub Partnerships from procuring the necessary learning platform; and associated services required for training delivery and support. This is because the Partnership is not a body constituted with authority to purchase using the Public Procurement Portal. This has been overcome by developing a Memorandum of Understanding, which has now been agreed and signed by all 33 partner bodies (the 32 local authorities and Glasgow Housing Association) and necessary authority to purchase has been given to one local authority (North Lanarkshire Council) on behalf of the Partnership.

Procurement is now underway and involves a two stage process, which will conclude with the award of a contract to a successful supplier in June 2018. The design and building of the first iteration of the Training Toolkit is scheduled for completion and launch before the end of this calendar year.

Training and support on the use of the Housing Options Training Toolkit will be provided to locally based Administrators and Managers within each partner organisation and this will be facilitated by a part-time Training Toolkit Co-ordinator, who will be recruited and appointed over the next few weeks.

The Steering Group has developed an associated Business Plan, which sets out ongoing development and investment priorities over the lifetime of the 3-year contract with a Supplier. The priorities include detailed arrangements for updating and refreshing the modules and materials as required, to meet any changed legislative or policy imperatives over the life cycle of the Training Toolkit. Reviews of the Business Plan will be undertaken annually and reviews of performance outputs from the Training Toolkit will be undertaken on a quarterly basis as a consequence of the Contract Conditions.

Quality assurance targets are built into the Contract Conditions. The routine evaluation and performance monitoring of the outcomes will be informed by wide ranging stakeholder involvement, which will include a comprehensive suite of performance reports, service user surveys and feedback; and an annual event to consolidate and inform our key priorities. The Scottish Government is a key stakeholder in that process.

The modular design of the Training Toolkit incorporates all relevant aspects of housing advice and information, including diversity, equalities legislation and knowledge transfer on gender based violence and abuse. The flexible design and ongoing development of the modules, and input from a range of contributing partners, will ensure the currency and relevance of the training materials throughout the lifetime of the contract period.

HARSAG recommended that staff should be supported with high quality training and support to respond as effectively as possible to prevent rough sleeping. We know that the plans around the training toolkit are comprehensive and believe that its development will meet both the Committee’s and HARSAG’s recommendations. We will keep this under review and will
also consider further opportunities to ensure that front line staff have the range of knowledge and skills to provide support and advice in all circumstances.

EXTENDING HOUSING OPTIONS

95. The Committee agrees that the third sector and health service have a vital role to play in assisting local authorities in their duties in relation to Housing Options. A collaborative approach would ensure a whole-systems approach to the prevention of homelessness so that as wide a range of options and solutions as possible are available to those who present at risk of homelessness or in housing need.

96. The Committee also agrees that the Housing Options Hubs provide an opportunity for grouped local authorities to share best practice but the Scottish Government should go further and encourage the third and health sectors to contribute to those hubs.

97. The Committee notes that Housing Options should allow for a degree of local flexibility to reflect local circumstances, however, its application should allow for consistent outcomes across the country. The Committee would welcome information on how the Scottish Government will encourage local authorities to share and apply best practice through the Housing Options Hubs.

98. The Committee notes comments regarding the risks to local flexibility of putting Housing Options on a statutory footing. We welcome the Minister's commitment to look at what is happening in other jurisdictions regarding this approach and seek an update on how, and when, the Scottish Government will carry out this evaluation. We also request an update on the outcomes of its deliberations.

Housing Options was launched in Scotland in 2010 and has enabled local authorities and their partners to focus on prevention of homelessness, rather than just processing a homelessness application. This has led to the reduction in homelessness that the Committee has noted. Five housing options hubs have been established across Scotland covering all 32 local authorities and Glasgow Housing Association. The hubs were established, in the first instance, to share practice and learning and they have continued to do this. The Scottish Government respects the role of the hubs in determining the frequency of their meetings and the work of each hub, but aims to enable sharing of practice between the hubs as well as amongst the members of a hub. We recognise how vital it will be to recognise, celebrate and spread best practice and we will look closely at how we can best support this through the existing hubs model.

Each hub invites other organisations to attend their meetings in order to have a conversation about how they can best work together. This has involved organisations such as Scottish Prison Service, NHS Health Scotland, Crisis and Scottish Women's Aid among others, attending hub meetings to gain their insights as well as being able to share their own work, a good example of which is the development and dissemination of Sustainable Housing on Release for Everyone (SHORE) standards around offenders and housing.

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See www.lobbying.scot

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The Scottish Government has a quarterly meeting open to representatives of the hubs to attend. Each meeting has a presentation by each of the five hubs in order that their learning and practice can be shared widely throughout Scotland, this in part, was the genesis of the development of the training toolkit across 33 partners, a remarkable achievement. At these meetings, other organisations are also invited to speak about their developments. This has included SAY Women, Scottish Refugee Council, CELCIS, This enables organisations to be able to speak to all hubs in one space which maximises the effectiveness of their input and allows cross fertilisation of ideas.

As we take forwards actions set out by HARSAG, including the increased focus on prevention and collaboration across all local public bodies, we will consider the ways in which we can build on the Housing Options hubs model to further facilitate greater join up among local partners. Central to the Action Group’s recommendations on achieving greater levels of prevention of homelessness was the adoption of a “no wrong door” approach to people who need homelessness assistance from any public or 3rd sector agency. We will look to achieve this in partnership with local authorities by building on the strengths of the current Housing Options approach and recognising the need for empowered, well trained frontline services and identifying areas for greater flexibility and accessibility of support.

With regards to considering the status of Housing Options and preventative approaches in legislation, we have accepted the following recommendation from HARSAG:-

- Scottish Government should examine the case for introducing a comprehensive homelessness prevention duty on local authorities and other public bodies, learning from and building on recent experience in Wales and England.

DATA COLLECTION AND MONITORING

104. The collection of high quality and robust data is important to monitoring and evaluating the performance and effectiveness of Housing Options. In that regard we recognise that there can be tension between local variability and the ability to compare performance across Scotland.

105. We therefore seek further information from the Scottish Government on how:
- it monitors the outcomes arising from the Housing Options approach;
- it determines whether the causes of variations between local authority areas reflect appropriate local decision taking and circumstances; and
- the data collected is being used to inform future decisions regarding how the Housing Options approach is delivered.

106. The Committee notes that the introduction of the Housing Options guidance may impact on the number of homelessness applications made.

We seek further information on how the Scottish Government will reassure itself that any increase in application numbers arises from the more rigorous application of the guidance, rather than an increase in actual
homelessness.

As stated in Scottish Government Housing Options statistical publications, whilst local authorities have a general prevention duty under section 2 of the Housing (Scotland) Act 2001, Housing Options itself is not specifically defined within a legislative framework. Scottish Government policy has been for Housing Options to be developed locally to best meet local needs and circumstances. As such, there is no single definition of Housing Options operating across all local authorities and because of the differing approaches to deliver their duty, local authority outcomes are therefore not directly comparable and cannot be used as indicators of good or bad performance. The Scottish Government funded Housing Options hubs are working to develop a training toolkit which will introduce a degree of consistency across the country but there will be local developments taking account of housing markets and available options.

The Scottish Government currently reports on trends in the number of homelessness applications through the bi-annual Homelessness in Scotland statistical publication. This publication also includes a range of information on the characteristics and prior circumstances of households making homelessness applications, which can be used to build up a picture of how any underlying reasons for homelessness are changing over time compared to trends in the overall numbers of Housing Options approaches and outcomes recorded.

HARSAG also recommended that local authorities and public bodies should work together to prevent rough sleeping at every opportunity. The Scottish Government has accepted this recommendation in principle and will work with local authorities and partners to take this forward. This work is likely to include consideration of local variations in approach and any implications for how the Housing Options approach is delivered.

AWARENESS OF RIGHTS

120. The Committee is concerned to note that, even with some of the most robust legislation protecting the rights of homeless people or those threatened with homelessness, there are reports that those rights are being denied.

121. Whilst the Housing Options toolkit has been developed to provide information for housing services staff, we consider it is equally important that information on homelessness services and rights is available, accessible and in a format (and location) that best meets the needs of those at risk of, indeed, already homeless. We, therefore, recommend that the Scottish Government review the format, contact and accessibility of information on homelessness services for the public to ensure it remains fit for purpose.

122. It is worrying to hear that any person who is homeless, or at risk of homelessness, has to seek legal advice in order to access services that they are entitled to. At a time of considerable worry and stress, there will be some who either are unable or unaware of such advice and who are, therefore, at risk of needlessly ending up homeless. We seek confirmation of how the Scottish Government intends to monitor and address this issue as a matter of urgency.
123. In reviewing the information available we therefore recommend that the Scottish Government works with law centres and other stakeholders to ensure that any public information on homelessness best meets the range of needs of those it is designed to support.

As recognised by the Committee the legislation protecting the rights of homeless people or those threatened with homelessness is strong. There are also clear requirements on local authorities to ensure advice and information is available. The Housing (Scotland) Act 2001 requires that local authorities must secure advice and information is available free of charge to any person in the authority’s area about:

- Homelessness and the prevention of homelessness; and
- Any services which may assist a homeless person or assist in the prevention of homelessness

The Act also gives powers to Scottish Ministers to issue guidance, either to local authorities generally, or to a particular authority, as to the form and content of such advice and information. The Homeless Persons Advice and Assistance (Scotland) Regulations 2002 came into force on 30 September 2002. This covers advice on accommodation, social issues, financial advice, legal advice including the availability of legal aid, and advice on the availability of independent advice and advocacy. Assistance, as covered by the regulations, cover personal interviews with a local authority officer of the same gender as the applicant may reasonably request, providing an interpreter, providing a written record, providing for a follow up interview, arranging and facilitating interviews and appointments with other independent providers of housing, financial or legal services and access to mediation services.

The Code of Guidance on Homelessness expands on the regulations highlighting ways for local authorities to assist people by providing advice and assistance.

We consider that the framework is clear around local authority responsibilities on ensuring advice and information is available. However, we will continue to work with law centres and other stakeholders to review requirements as we seek wider changes to the current arrangements to secure significantly greater levels of prevention of homelessness.

More generally, the Scottish Government provided over £20 million of project funding for advice services in 2016/17 and a similar amount in 2017/18. This funding is supporting advice provision for individuals on income maximisation (including welfare, debt and financial capability advice, and advice on reducing household costs such as energy bills); and/or statutory rights, including how to seek recourse if those rights are not upheld.

The Scottish Government is providing £1.67 million to the Scottish Legal Aid Board in 2018/19 to support advice and information services across three programmes aimed at widening Access to Justice through the provision of high quality advice and information services as detailed below:
The Early Resolution of Advice Programme has two funding streams (Stream 1 and Stream 2):

Stream 1 projects provide one or more of the following:
- Direct assistance and representation for people facing court action related to mortgage repossession or tenancy repossession and direct assistance that tackles the multiple and serious debt issues underlying these court actions.

Stream 2 projects provide one or more of the following:
- Information, one-off advice and signposting to people with small claims
- Other civil court matters to increase people’s ability to navigate the court process themselves or to seek further assistance and casework assistance to people with small claims-level cases enabling them to resolve matters pre-action or settle them early in the court process.

Making Advice Work (MAW) programme
Stream 1 of the programme is designed to focus funding on projects that can provide advice, information and representation for people across a geographic area, with a focus on help to resolve benefit and complex debt problems and to provide targeted assistance to help people successfully make the transition to the new benefits system. This includes provision of second tier help for advice services across all areas, enhancing capacity to handle complex housing and debt problems, exacerbated by welfare reforms.

Tackling Money Worries (TMW) programme
This programme is designed to focus on improving outcomes for low-income families with children facing a change in their circumstances which places them at higher risk of debt and money problems.

The projects in this programme contribute to the following aims:
- To connect low income families to appropriate help which results in resolution of debt problems and to enable families themselves to better avoid problems recurring, know what to do if they do recur and to feel more financially capable;
- To build lasting and effective connections between quality advice providers and trusted sources of support for vulnerable families in the community.

The projects focus on tackling the unmet debt and financial capability needs of low income families affected by one of the following key life events:
- The birth of a child and early years, particularly where families have a disabled child;
- Change to family structure, for example when relationship breakdown occurs;
- Impact of going through the criminal justice system, including families where someone is in prison or about to leave prison.

Projects will assist families dealing with crisis situations, the need for debt advice, and also carry out financial capability work that can prevent families falling into debt in the future.
The Scottish Government aims to work in partnership with public and third sector organisations to put user needs at the forefront of service delivery and design. mygov.scot is the place for people in Scotland to access public services that are easy to find and simple to use, and includes a section dedicated to the support that is available for those facing homelessness and their rights. This information is continually improved, using stakeholder and user feedback.  
https://www.mygov.scot/housing-local-services/repossessions-emergency-housing-evictions/

The Independent Strategic Review of Legal Aid in Scotland (http://www.gov.scot/About/Review/legal-aid-review) was published on 28th February 2018. The report provides a platform for further reforms of the legal aid system in Scotland and we will consider its recommendations in consultation with justice organisations, the legal profession and partners who have been tasked with change.

SCOTTISH HOUSING REGULATOR

124. We welcome the work carried out by the Scottish Housing Regulator on mapping the journey of homeless people and seek clarification of how any evidence of gatekeeping or barriers to accessing services will be addressed as a matter of urgency, alongside how lessons learned will be used to identify and rectify issues across Scotland. We also seek an update on the outcome of this work at the earliest opportunity.

We are aware the Scottish Housing Regulator has committed to provide the Committee with the outcomes from its work on homelessness in Glasgow. The report from the SHR was published on 29 March and the Scottish Government has urged that the Council and their partners accept all the recommendations and work at pace to improve services for homeless people.

TEMPORARY ACCOMMODATION

151. Temporary accommodation unfortunately remains a part of tackling homelessness and it is a concern to the Committee that, as we heard, it is increasingly being used. What is also clear from the evidence we heard is that a number of challenges regarding its quality, flexibility and suitability remain to be addressed.

152. We welcome the Minister’s confirmation that standards of temporary accommodation will be a focus of the action group. We consider that noone should be placed in the position of having to accept poor quality accommodation just because they are homeless. As such, we recommend that the standards set for temporary accommodation should be statutory rather than voluntary.
153. We seek confirmation that the Action Group will address:
• how to reduce the amount of time homeless people spend in temporary accommodation before they move to permanent accommodation;
• the impact on people of being moved to different places of temporary accommodation over short periods of time;
• the extent to which local authority procurement of temporary accommodation can be used to drive up standards of accommodation and ensure that it remains affordable and accessible for all those who require it; and
• how it will ensure greater options and flexibility to convert temporary accommodation to permanent lets where appropriate for the family or individual concerned.

154. In relation to costs, we understand that the costs of providing temporary accommodation can be variable and significant in some cases. We recommend that the Scottish Government undertakes a comprehensive analysis of the cost of all types of temporary accommodation to the public purse, and those who require to use it, to determine whether this funding can better support people out of homelessness.

155. No person should be accommodated in unsuitable temporary accommodation and so, it was worrying to hear from Crisis that young people are being accommodated in unsuitable temporary accommodation particularly as their age may make them more vulnerable to being exploited. We recommend that, as a priority, the Unsuitable Accommodation Order should be extended to young people to limit the time they spend in unsuitable accommodation to no more than 7 days.

While it provides an important safety net in emergency situations, we want to see greater prevention leading to less need for temporary accommodation; faster moves to settled accommodation leading to less time spent in temporary accommodation and improvements in the quality of the accommodation itself and in the support provided to people who are living in it. That is why the third question posed to HARSAG was how to transform the use of temporary accommodation.

I am aware that the HARSAG has begun their discussions on this question and has commissioned two complementary pieces of work to help it reach recommendations around temporary accommodation which are expected to be received by Government later in the spring.

The general view of HARSAG is that temporary accommodation should only be used as an emergency stop-gap for people and that length of time is minimised where appropriate (on occasion, people will benefit from slightly longer stays in temporary accommodation as the most appropriate settled accommodation is secured). To get to this point the two commissioned pieces of work will help HARSAG come to practical recommendations about how this can be achieved.
The first piece is entitled “Temporary Accommodation in Scotland.” Its overall aim is to provide detailed understanding of the nature, purpose and use of temporary accommodation across Scotland. It will look at how to define temporary accommodation, its purpose and function, what types are used, what is known about quality and appropriateness and to look at costs of temporary accommodation and look at any variations across Scotland.

The second piece is entitled “Rapid Rehousing Transition Programme”. The purpose of the project is to help determine how we redress the current balance of housing options. The Action Group has set up certain principles to inform this: rapid rehousing to reduce time spent in temporary accommodation; mainstream temporary furnished flats within a community being the best temporary option; mainstream housing with wrap around support being the best settled option and size of shared accommodation. The project will help understand the current scale and type of temporary accommodation, define rapid rehousing, outline the optimum balance of accommodation across the country, set out the scale of the national gap, create an implementation framework and identify national policy/system change required to facilitate implementation.

The Action Group will look at standards of temporary accommodation across Scotland within this work. We have already committed that the standards in temporary accommodation should be the same as for permanent accommodation and will take this forward following consideration of HARSAG’s further recommendations.

In October, we limited the use of unsuitable accommodation by amending the regulations so that this form of accommodation can only be used for households with children and pregnant women for up to 7 days from 14 days. We will be considering the options around extending this to people who are care experienced and/or young people, including a consideration of HARSAG’s further recommendations on temporary accommodation later in the Spring.

**CODE OF GUIDANCE ON HOMELESSNESS**

161. The Committee is concerned to hear that the Code of Guidance has not been updated since 2005 and that it is, therefore inaccurate and a potential barrier to the provision of temporary accommodation. We recommend that the Code of Guidance be reviewed urgently by the Scottish Government to ensure that it is accurate and up to date. Any such review should ensure that any associated guidance and legislation referred to in the Code of Guidance, and terminology used, is relevant and not acting as a barrier to the provision of temporary accommodation.

162. We also recommend that the Minister establishes a regular review mechanism for the Code of Guidance such that it remains relevant, update to date and accessible.

We note the Committee’s comments on the Code of Guidance on Homelessness and note that the HARSAG also made a recommendation on updating it:

- Amend and update the Scottish Code of Guidance on Homelessness to reflect both existing non-statutory guidance on Housing Options and any new legislative
requirements, and ensure the Code is updated regularly to reflect such changes. Also consider impact of the recommendations on the regulatory framework.

The Scottish Government has accepted this recommendation and work is now underway to take this forward with local authorities and partners.

JUDICIAL REVIEW

163. The Committee is concerned that judicial review is the only mechanism for appeal in relation to the provision of temporary accommodation, given that it only assesses whether the correct procedure has been followed. The Committee recommends that the Scottish Government investigate whether a more accessible and independent appeals process should be provided.

164. Measures, such as litigation through equalities legislation, to improve the rights of access to people with mental health issues and protected characteristics are well-intentioned but shed light on further problems with the provision of temporary accommodation. We recommend that the Action Group should specifically consider the specific needs of those with mental health issues and protected characteristics to enable a better understanding of the barriers to them accessing accommodation appropriate to their needs.

We will review arrangements for appeal in response to the Committee’s findings to determine whether further clarity is required on the current position. There is a right for a homeless applicant to request an internal review under s35A and s35B of the Housing (Scotland) Act 1987. This right was inserted by section 4 of the Housing (Scotland) Act 2001. The request for a review must be made, either verbally or in writing, within 21 days of being notified of the local authority’s decision. The review must be carried out by a senior housing officer who has had no prior involvement in the case. The applicant should be informed of the review decision and reasons for that decision in writing. While a review is being investigated the applicant will have the right to temporary accommodation until a decision is made.

Judicial review is also available. It is not the same as appeal. If a judicial review claim is successful the usual result is that the decision is “quashed” or nullified. This usually means that the public body has to take the decision again applying the proper legal test or following a fair procedure. This can result in the same decision being taken.

THE USE OF SHELTERS FOR ROUGH SLEEPERS

180. We welcome the steps taken and extra resource provided by the Scottish Government to address the needs of rough sleepers for winter 2017-18, especially given that some of the shelter-based services had been at full capacity over recent winters. We acknowledge the Scottish Government’s longer term ambition of eradicating rough sleeping and transforming the use of temporary accommodation. We seek evidence from the Scottish Government of whether the outcomes from the short-term measures implemented in winter 2017-18 have been delivered. We would also seek evidence of how any best practice arising from these measures will inform its longer-term ambitions.
181. There is not one solution to the problem of rough sleeping. Services should be person-centred and wide-ranging to suit the requirements of all. In that regard, wrap-around services and outreach, alongside shelter, are also key to ensuring that those who present at shelters can be supported towards longer-term sustainable Housing Options.

182. We, therefore, request an update on how the increased short-term measures taken during winter 2017-18 have been used to identify those with higher needs (and who may not have presented before) and to put in place longer term measures, where possible, to aid their transition out of rough sleeping and homelessness.

183. We heard that the use of shelters is not a preferred approach for some who seek to address homelessness. In designing future services, however, we consider that the Government should recognise that some, such as those who rough sleep and who have complex needs, may rely on the use of shelters to aid their rehabilitation at their own pace and time.

184. The Committee notes that the initial recommendations of the Action Group have a focus on city centres. We recommend that its future work and recommendations should also take into consideration the specific needs of people living in towns and rural communities and who find themselves rough sleeping.

The action we have taken this winter, following the first set of HARSAG recommendations, to increase the capacity and capability of homelessness services in our cities has provided the base for front line services to deliver quick, flexible and innovative support to people at risk of rough sleeping. Improved multi-agency partnership working, adopting a ‘by name lists’ approach, has helped to build relationships, understanding and trust and ensure people get the effective support and to provide appropriate support and accommodation options based on their individual needs.

In Edinburgh, for example, the additional resource to increase capacity at the Winter Care Shelter and to provide rapid access beds this winter has meant that, unlike in previous years, no-one has been turned away from the care shelter since capacity was increased. In Aberdeen, an Assertive Outreach Service has been established for the first time, enabling outreach workers to build relationships based on trust and to offer solutions informed by a better understanding of people’s backgrounds, particular circumstances and complex needs. The success of the interventions this winter was particularly evident during the recent extreme weather conditions when the increased capacity and flexible options, including the use of personalised budgets, meant outreach services across the cities were able to respond quickly and effectively to offer support and a safe place to stay for all of the people known to be at risk.
On 7 March, I was pleased to announce that we had accepted, in principle, all of the second set of recommendations from HARSAG on how to end rough sleeping for good, and that we will now work with HARSAG and other stakeholders to ensure they are implemented. This included a commitment to learn from what has worked well this winter and to ensure that the benefits are harnessed for more effective interventions all year round. We will work with relevant local authorities and third sector partners to review and learn from the success of the actions this winter, and to identify and continue with innovations which have shown promise. We will also work, together with partners, and drawing from the successes this winter, to develop a consistent national delivery model for front line outreach services to support more immediate, multi-disciplinary and person-centred front line interventions for people at risk of sleeping rough. To continue with the good work in the short-term, while we take the latest recommendations forward, I also announced an additional £150,000 to extend some funding until the summer for projects that have been assisted and proved successful this winter.

Learning from the experiences of people who have direct experience of homelessness has been at the centre of HARSAG’s work. Through the ‘Aye We Can’ consultation and HARSAG stakeholder events, the Action Group has considered the views of more than 400 people with experience of homelessness across Scotland, including rural communities, either through focus groups, on the phone or by online survey. This has helped HARSAG consider and develop proposals which are in line with what is really needed by the people at the sharp end of homelessness. While already used to inform recommendations to date, this work will be at the heart of HARSAG’s further consideration on how to transform the use of temporary accommodation and end homelessness across Scotland, including rural communities, for good.

HARSAG made two recommendations:

- Learn from what worked well this winter and ensure the benefits are harnessed for more effective interventions all year round; and
- Ensure an effective evidence based approach to front line support which secures a successful transition off the street as quickly as possible.

The Scottish Government has accepted these recommendations in principle and will work with local authorities and partners to take this forward as set out above.

THE NUMBER OF ROUGH SLEEPERS

196. The true level of rough sleeping is unclear and, without the right information, it is difficult to ensure that appropriate services are in place to assist people out of rough sleeping. The Committee agrees that more accurate information on rough sleepers will assist in identifying what works and the barriers to supporting people into accommodation.
197. The Committee, therefore, requests further information on the extent to which the Scottish Government works with local authorities in auditing the numbers of rough sleepers. Such audits would allow a greater understanding of the needs of those who present as homeless, as compared to those who do not engage with services. It would also provide a better understanding of those most at risk of rough sleeping, such as people with certain protected characteristics, those with complex needs and those with insecure immigration status. We also seek an update of how the Scottish Government will support the sharing of best practice between local authorities on how to effectively monitor rough sleeping levels to better inform local solutions.

It is true that lack of good information on the extent and nature of the problem of rough sleeping can hinder the development of strategic solutions at the local or national level; HARSAG also recognised the issue and made recommendations in response.

At present, the Scottish Government collects information on rough sleepers from local authorities through the HL1 data collection, which allows for analysis and publication of a range of information about the people and households who make homelessness applications to local authorities, such as whether the applicant has recently slept rough. Rough sleepers who do not approach local authority statutory services are excluded from this information.

To improve the approach to data collection for people sleeping rough across Scotland, it is intended that work will be carried out on the basis of HARSAG’s recommendation 18. This recommendation outlined that improvements to data collection should build on the work being undertaken by the Centre for Homelessness Impact to develop an outcomes framework for homelessness and rough sleeping in Scotland, and which should be extended to include an options appraisal to determine the detailed requirement of a solution similar to the CHAIN system used in London, which enables frequent and regular reporting of numbers, locations and other rough sleeping data. The introduction of such a system in Scotland would be able to underpin the development of a set of metrics to facilitate effective monitoring of rough sleeping; help measure the impact of local solutions, and enable scrutiny of progress towards ending rough sleeping in Scotland.

HARSAG made recommendations:

- Improve the approach to data collection for people rough sleeping to maximise effectiveness of support provided through multi-agency working and to understand and assess progress to reducing rough sleeping;
- Ensure data collections reflect increased priority now being given to homelessness reduction; and facilitate scrutiny of progress towards ending rough sleeping in Scotland.

The Scottish Government has accepted these recommendations in principle and will now work with the Centre for Homelessness Impact as well as local authorities and partners to:-

- explore the outcomes framework and set of metrics required to assess progress towards the goal of eradicating rough sleeping; and
• to establish requirements for a data collection and management system to enable multi-agency working and effective interventions for individuals rough sleeping or at risk of rough sleeping.

A SCOTTISH MODEL OF HOUSING FIRST

229. We heard clear evidence from those who had undertaken pilots in Scotland, as well as from international comparisons that Housing First leads to positive outcomes. The Committee recommends that the Scottish Government, in partnership with local government, implements a Scottish Housing First policy.

230. In looking the adoption of Housing First, the Scottish Government should consider:
• how elements of best practice from previous pilots, such as the Turning Point experience and international examples, could inform policy development for an approach that fits Scotland’s context;
• how budgets from different agencies (such as health, local government and justice) can be aligned to fund preventative measures, the wrap around support and extra homes required that may be required to accommodate permanent tenancies under Housing First; and
• how it will provide the strong leadership and guidance required to drive key partners to work together and buy-into this approach and to support the practical changes required to effectively implement the Housing First model.

The Scottish Government has been supportive of the model of Housing First for people with more complex needs. We welcome the early work by Turning Point Scotland about bringing this approach to Scotland and we are supportive of the various developments around Scotland, including the work of local authorities, Social Bite, Glasgow Homelessness Network, the Rock Trust and others in spreading the availability of this form of accommodation and support to help people with the most complex needs.

HARSAG made two recommendations:

• Set a clear national direction of travel to transition to a model of “rapid rehousing” by default across Scotland; and
• Ensure that people sleeping rough and experiencing multiple forms of exclusion are supported to secure permanent accommodation as quickly as possible, according to the best evidence available (Housing First being singled out for people sleeping rough who experience multiple forms of exclusion).

The Scottish Government has accepted these recommendations in principle and will work with local authorities and partners to take this forward. This work will cover the main areas outlined for action by the Committee.
National leadership to oversee effective development of Housing First approaches, where these are appropriate, as well as wider work following HARSAG’s recommendations, will be overseen by the Homelessness Prevention and Strategy Group (HPSG) which is co-chaired by the Minister for Local Government and Housing and COSLA’s spokesperson. The Group also includes some members shared with HARSAG which will provide a useful continuity (e.g. Crisis, Shelter, ALACHO, Simon Scotland and Streetwork, Streetsoccer) and also others including NHS Health Scotland, LGBT Youth Commission and SOLACE. This Group therefore includes key partners and will be able to support the effective implementation of the range of actions required to meet our ambitions to eradicate rough sleeping, transform temporary accommodation and end homelessness including the scale up of Housing First. The HPSG met on 28 March to agree its refreshed Terms of Reference and start to take its work forward including consideration of the best way to ensure leadership for the changes needed is in place through all parts of the system.

MULTI-AGENCY WORKING

244. The Committee agrees that all public agencies and relevant third sector agencies have a role to play in the prevention and solution to homelessness and notes that there is some good practice in that regard.

245. There is clear evidence that best outcomes are achieved when all the relevant agencies and their staff have the flexibility to make decisions and are empowered to act in the best interest of those facing homelessness. Whilst best practice exists, it is not always implemented across Scotland.

We therefore recommend the Scottish Government ensures that all the relevant agencies adopt whole-systems approaches to tackling homelessness, including—

• how it will encourage agencies to collaborate on renewed strategies to ending homelessness, based on approaches which produce the best outcomes and put the interests of the individuals needs at their core.
• how it will identify and eradicate any financial, structural or attitudinal barriers which may prevent multi-agency working;
• how it will ensure that best practice, such as those examples we heard, are embedded in local authority areas; and
• consider extending statutory duties beyond local authorities.

The Scottish Government agrees that all public agencies and relevant third sector agencies have a role to play in the prevention and solution to homelessness, it is more than a housing issue. There will be a combination of activity to ensure that all relevant agencies adopt whole-system approaches to tackling homelessness. The work of HPSG is a key element of this. HARSAG made three recommendations:

• Ensure local authorities and public bodies work together to prevent rough sleeping at every opportunity;
- Ensure legislation provides sufficient support for shift to significantly greater levels of prevention which will require looking at the case for introducing a comprehensive prevention duty on local authorities and other public bodies learning from and building on the experience in Wales and England; and
- Support staff with high quality training and support to respond as effectively as possible to prevent rough sleeping.

The Scottish Government has accepted these recommendations in principle and will work with local authorities and partners to take this forward.

**FURTHER ACTIONS ON HOMELESSNESS**

In addition to the range of issues raised through the course of the Committee’s inquiry, the HARSAG covered a number of additional areas where they have advised action is required in order to end rough sleeping for good:

- Review support to those who are at risk of rough sleeping, or who are in and out of emergency accommodation, and who are also involved in other street based activity, including street begging
- Support testing and, where appropriate, scaling of Community Hosting models to diversify the housing offer available to those experiencing or at risk of homelessness (including those without access to public funds)
- Continue to ensure an adequate and affordable housing supply, to tackle immediate needs and then maintain supply
- Remove barriers to exercising choice in settled accommodation to break the cycle of recurrent rough sleeping
- Put in place measures to protect those deemed to be without recourse to public funds, working with COSLA and other partners to respond to findings from the EHRC report on destitution to respond on the needs of homeless people or those at risk of homelessness; and
- Clarify the protection to be afforded to those without recourse to public funds.
Annex 2: HARSAG recommendations on ending rough sleeping

1. Ensure local authorities and public bodies work together to prevent rough sleeping at every opportunity

There must be progress across the public sector to maximise opportunities to prevent all homelessness and rough sleeping. They should ensure adoption of a “no wrong door” approach to people who need homelessness assistance from any public or 3rd sector agency. Adopting the purpose, skills and culture of multi-agency housing options, we need to invest in empowered frontline services, where staff are trained in trauma and PIE to ensure that people are assisted positively to access emergency and settled accommodation and support services rapidly. Local Authorities should transform the delivery of homelessness assessments to be more flexible, accessible and integrated with frontline services where homeless people are engaged and we should support LAs to discharge their statutory function on assessment through partnership with wider public sector and third sector.

2. Support staff with high quality training and support to respond as effectively as possible to prevent rough sleeping

Ensure an easily understood and clear national training programme and ongoing accreditation to ensure needs of specific groups are addressed, and psychologically informed approaches adopted including more informed approaches on so called ‘non engagement’ – to be delivered to front line staff and made mandatory to staff in key roles, going beyond those working directly in housing and homelessness to incorporate all staff likely to come into contact with people who are rough sleeping or at risk of rough sleeping.

3. Ensure plans are always agreed – or agreed as quickly as possible – to prevent homelessness for the groups who are predictably at highest risk of rough sleeping

Scottish Government and all public bodies should respond to evidence of which groups constitute the highest proportion of people resorting to rough sleeping to clearly articulate the pathways and interventions needed to prevent this outcome for particular groups. Evidence suggests this would include:-

- People leaving public institutions such as prison, mental health services, armed forces
- People with previous experience of public institutions such as prison, mental health services, armed forces
- Groups with particular needs such as women who have experienced domestic violence, migrants, asylum seekers, refugees, people experiencing relationship breakdown, LGBT groups and people with experience of the care system or on leaving the care system
- People who have experienced or are experiencing poverty and/or adverse childhood experiences
- Those facing potential eviction from the private rented sector, or the social rented sector including particular approaches on rent arrears.

Where this exists (e.g. SHORE standards for prisoners) SG should ensure that the pathways are implemented; and where this does not yet exist for key groups as above, SG should ensure pathways are developed and implemented.

4. Learn from what worked well this Winter and ensure the benefits are harnessed for more effective interventions all year round

Scottish Government and the relevant local authorities should review the success of the actions implemented to minimise rough sleeping this Winter to identify innovations which have shown promise and which should continue in order to allow continued support to people sleeping rough, and learning to be gathered with a view to mainstreaming those interventions which can be shown to be cost effective in the long term.

5. Ensure an effective evidence based approach to front line support which secures a successful, sustainable transition off the street as quickly as possible

Scottish Government, together with partners, should develop a consistent national delivery model for front line outreach services to support more immediate, multi-disciplinary front line interventions for people sleeping rough - or at risk of doing so - to facilitate successful and sustained transition off the street.

The approach should be adopted nationally, but tailored to the local situation and drawing on learning from this year’s winter actions and other evidence e.g. use of personalised budgets to support access to emergency accommodation and allow outreach workers to build relationships and trust with people rough sleeping who have complex needs. Once approaches have been tested and demonstrated improved outcomes, they should be ‘hardwired’ into systems and processes.

This should:
- Include a multi-agency approach which empowers front line staff to be able to act to find emergency solutions for people sleeping rough, including a ‘by name list’ approach
- Include flexibility in statutory services to enable rapid transition in certain circumstances, recognising that this might include changes to current allocation policies
- Ensure access to training and information (including that generated by the new data system covered by recommendation 18) to maximise effective support for individuals

Local areas should be invited to model and carry out test of change initiatives to deliver immediate/direct access via non-statutory street/assertive outreach

6. Recognise that, while not necessarily rough sleeping, people who are engaged in street begging are also likely to need support with housing and will be, almost without exception, extremely vulnerable

Scottish Government should review support to those who are at risk of rough sleeping, or who are in and out of emergency accommodation, and who are also

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See [www.lobbying.scot](http://www.lobbying.scot)

St Andrew's House, Regent Road, Edinburgh  EH1 3DG
www.gov.scot
involved in other street based activity, including street begging, with a view to developing a national approach, while recognising that not everyone who experiences rough sleeping is engaged in street begging and vice versa, and taking into consideration, where appropriate, work currently being undertaken by Street Begging strategy groups in Glasgow and Edinburgh, who have both commissioned research on Street Begging and what is effective in tackling the issue.

7. Set a clear national direction of travel to transition to a model of ‘rapid rehousing’ by default across Scotland, ensuring that the plans are developed and led locally to achieve this vision – this will impact on all groups of homeless people, not just people sleeping rough or at risk of doing so

Each local authority area to develop and cost a 5-year ‘Rapid Rehousing Transition Plan’ by December 2018, within the framework consulted on and published by the Action Group in June 2018.

By ‘rapid re-housing by default' we mean:

- Someone who is rough sleeping or at risk of rough sleeping should be housed in settled mainstream accommodation as quickly as possible
- Someone who has complex needs and is rough sleeping or at risk of rough sleeping should be housed in settled mainstream accommodation with the necessary wraparound support (in line with Housing First principles) as quickly as possible
- Someone who is rough sleeping or at risk of rough sleeping for whom rapid rehousing or Housing First would not yet be suitable (either because they do not want to move into mainstream housing, or because they have such a severe set of needs that they cannot safely be rehoused in mainstream accommodation) should be provided with accommodation that deals with their particular needs with the specialist support that is required

8. Ensure that people sleeping rough and experiencing multiple forms of exclusion are supported to secure permanent accommodation as quickly as possible, according to the best evidence available

Scottish Ministers should announce a default to Housing First as part of a rapid rehousing model for people sleeping rough and experiencing multiple forms of exclusion. Include this expectation in a revised Scottish Government Code of Guidance on Homelessness.

9. Provide resource and oversight to ensure a successful transition to the rapid rehousing approach

Scottish Government should create and resource additional capacity to drive Scotland's transition to rapid rehousing approaches and appoint a national delivery group, as a sub-structure of the Homelessness Prevention and Strategy Group, to:-

1) monitor the rapid rehousing transition plans being developed in local areas; and
2) steer and support the scaling up of Housing First in Scotland

10. Ensure people have a range of different options at point of crisis to support them to avoid resorting to rough sleeping
<table>
<thead>
<tr>
<th>Scottish Government should support testing and, where appropriate, scaling of Community Hosting models to diversify the housing offer available to those experiencing or at risk of homelessness (including for those without access to public funds)</th>
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<tr>
<td><strong>11. Continue to ensure an adequate and affordable social housing supply</strong></td>
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<tr>
<td>Scottish Government, local authorities and Registered Social Landlords should continue to ensure an adequate affordable and social housing supply to tackle immediate needs and then maintain supply. This would be assisted by an agreed definition of affordable housing in the Scottish economic context and a long term view over the next 20 years, with cross party support for the commitment.</td>
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<td><strong>12. Remove barriers to exercising choice in settled accommodation to break the cycle of recurrent rough sleeping</strong></td>
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<tr>
<td>Additional support, independent advice and advocacy should be factored as standard into online and choice based letting/bidding systems to eliminate the practical, language or literacy barriers to self-selecting settled accommodation.</td>
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<td><strong>13. Put in place measures to provide protection to those without recourse to public funds</strong></td>
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<tr>
<td>Scottish Government should continue to work with COSLA and other partners to respond to findings from the Equalities and Human Rights Committee report on destitution to respond to the needs of homeless people and people at risk of homelessness who are deemed to have no recourse to public funds, and in the meantime should act on the following recommendations which follow from that work:</td>
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<td>- Funding for a preventative Independent Advocacy service, covering both people destitute through the asylum process and those EEA nationals who are without recourse; and</td>
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<td>- Ensure robust input to the inspection of asylum accommodation currently ongoing across the UK which will inform the 2019-2029 accommodation contracts, with the aim of achieving better alignment with Scotland’s legislative and policy context. This input should focus on people’s sense of safety and security and explore the potential for Scottish regulatory or best practice standards for asylum dispersal and accommodation.</td>
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<td><strong>14. Ensure legislation provides sufficient support for shift to significantly greater levels of prevention</strong></td>
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<td>Scottish Government should examine the case for introducing a comprehensive homelessness prevention duty on local authorities and other public bodies, learning from and building on recent experience in Wales and England.</td>
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<td><strong>15. Revise legislative arrangements that can result in difficulties with people being able to access their rights</strong></td>
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<td>Scottish Government should revise the legislative arrangements on local connection and intentionality. Specifically, they should commence the current provisions on intentionality in the 2003 Act and narrow the definition to focus on instances of ‘deliberate manipulation’ of the homelessness system. In addition, they should commence the provisions on Local Connection in the 2003 Act and Ministers should exercise powers they would then have under S8 to suspend referrals between local authorities to remove barriers to support for people who are homeless or rough.</td>
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sleeping or at risk of homelessness or rough sleeping. Scottish Government should monitor the impact of these changes on local authorities to respond to any LAs coming under undue pressure as a result of disproportionate net inflows.

| 16. Clarify the protection to be afforded to those without recourse to public funds |
| Scottish Government should clarify in the Code of Guidance the role and responsibility of local authorities to support people who are deemed to have no access to public funds (so-called NRPF). This should be considered alongside the wider recommendations set out above for those with no recourse to public funds. |

| 17. Update the Code of Guidance |
| Amend and update Scottish Code of Guidance on Homelessness to reflect both existing non-statutory guidance on Housing Options and any new legislative requirements, and ensure the Code is updated regularly to reflect such changes. Also consider impact of the recommendations on the Regulatory Framework. |

| 18. Improve the approach to data collection for people rough sleeping to maximise effectiveness of support provided through multi-agency working and to understand and assess progress to reducing rough sleeping |
| Scottish Government should implement a solution similar to the CHAIN system used in London, to support two aims of the HRSAG – (i) real-time ‘by name’ data sharing between the agencies working with people who are rough sleeping or at risk of rough sleeping, and (ii) enabling frequent and regular reporting of numbers, locations and other data to support monitoring the reduction in rough sleeping across Scotland. This should build on the work being undertaken by the Centre for Homelessness Impact to develop an outcomes framework for homelessness and rough sleeping in Scotland, which should be extended to include an options appraisal to determine the detailed requirement of a national ‘CHAIN-like’ system. Enabled by such a system, a set of clear metrics should be developed to enable effective monitoring of progress towards ending rough sleeping. |

| 19. Ensure data collections reflect increased priority now being given to Homelessness reduction |
| Re-instate the homelessness questions in the Scottish Household Survey, given the high policy priority attached to this topic. |

| 20. Facilitate scrutiny of progress towards ending rough sleeping in Scotland |
| Based on the agreed metrics, the Minister for Local Government and Housing should provide a regular report to the Scottish Parliament to facilitate scrutiny of progress towards ending rough sleeping in Scotland. |