

Shelter Scotland response to the Homeless Network Scotland consultation on the Housing First framework, December 2020

Link to the Housing First draft framework <https://homelessnetwork.scot/wp-content/uploads/2020/11/National-Framework-For-Housing-First-CONSULTATION-NOV-DEC-2020.pdf>

Question 1. This section sets out the evidence, much of which is considered 'gold standard' in research terms, that indicates Housing First is better for people and more cost effective too.

What are the findings from data and evidence in this section that best encourages your organisation or sector to get behind Housing First?

Shelter Scotland has always said that Housing First (HF) has the ability to positively change the lives of some of the most vulnerable homeless people across Scotland and remains an important policy area to monitor, so we welcome this opportunity to respond to the consultation about the Housing First framework.

We support and advocate for Housing First and have a Housing First service we deliver in England. We have however consistently said that we must urgently address the structural factors, such as the lack of supply of affordable and secure homes, increasing levels of poverty and affordability issues which lead to homelessness, so that Housing First can be effectively implemented. It is imperative that we strategically address and invest in a range of relevant short- and long-term solutions, which will help everyone quickly and sustainably into safe, secure and affordable homes.

Learning from other countries who have introduced a similar HF model show that the model must be part of an integrated, holistic, sustainably funded and strategic housing and homelessness approach with strong cross-sector partnership working. As we come to the end of the HF pathfinder projects, and if we are to roll out HF throughout Scotland, we must carefully consider the learning to date and how we can ensure HF can be fully integrated. It must also be fully resourced and evaluated, to ensure that it can sustainably support some of the most vulnerable people in our society.

Housing First is not a model for homeless people with low or no support needs, it is a model specifically targeted at chronically homeless individuals with high or complex needs. It is therefore important that HF is seen as part of the solution to stopping homelessness in Scotland and must not overshadow or inadvertently undermine efforts to ensure that everyone who is in housing need, should have a safe, secure and affordable home.

Assessing the progress to date

Progress to date has seen 354 people supported by the HF model into settled accommodation. 310 people (88%) are still in their tenancies, including 6 people who have transferred to another Housing First tenancy¹. The high rate of tenancy sustainment is positive, however it seems that the original target of achieving 830 tenancies by 2021 will be difficult to achieve. An understanding of what the key issues or barriers have been to progressing more rapidly, and how they can be addressed is vital, if the HF model is to be scaled up successfully.

Although we are an advocate of Housing First, we do have concerns about some aspects of the pathfinder projects and the results. For instance, the long length of time people being supported through HF have had to wait in temporary accommodation for a settled tenancy to become available is an issue.

¹ <https://homelessnetwork.scot/wp-content/uploads/2020/11/HF-Scotland-Monthly-Tracker-OCTOBER-2020.pdf>

As of October 2020, the average wait has been 141 days, which means we are unable to fully assess what impact the model can have in Scotland, as there is little evidence that the pathfinder projects have been able to implement the HF model in a recognisable form. Indeed, the evidence available indicates that intensive support prior to moving into a settled tenancy, increases tenancy sustainability once a home eventually becomes available. Unfortunately, it has therefore not been established at this point in the pathfinder process, whether a tenancy first approach, as a differentiator from traditional albeit well-funded and delivered housing support prior to a tenancy, has better outcomes.

Therefore, any plans to scale up at pace, must now be matched by a clear analysis of what barriers to implement the HF model remain. Supply of suitable accommodation and reform of allocations policies may offer a useful starting point for that analysis.

The right to a home

We cannot just accept that in some areas people don't get a choice over their housing, due to the shortage of suitable, secure and affordable homes. If we are to realise the ambition to have a successful rights-based approach - with the right to a suitable, safe and affordable home, then we cannot ignore the fact that for this to become a reality, we need more high quality social rented homes in the right places. People need **true choice and power** over where they live, and we shouldn't accept that a lack of choice is 'just how it is'.

Measures to mitigate the impact of this housing emergency and reduce harm in the short term are required, however we must be ambitious and have a longer-term view of what is needed to ensure everyone has a decent, secure and affordable home. We also know that tenancies are more successfully sustained when people have true choice, and can live in an area where they can thrive, and in a home that meets their needs and is affordable.

Building the social rented homes

For HF to be implemented successfully we need a long term ambitious social housebuilding programme to reduce affordable housing need, for all statutory homeless people including, but not exclusively for those who need HF. According to independent research this requires at least [**37,100 social homes**](#) to be built over the next 5 years to reduce housing need.

Funding

Funding for HF has come from a range of sources, including charitable funding and this type of funding will not be sustainable in the long term, if the model is to be rolled out on a national level, as part of a strategic approach to stop homelessness in Scotland. For the HF model to succeed we need clarity on how the model will be funded sustainably and a clear and accurate assessment of the cost impact, with evidence showing the accurate costs across all the pathfinder providers. There have been different approaches regarding pay levels and contact time in some of the pathfinder projects, which unfortunately makes effective comparison of Housing First against pre-existing housing support models difficult. We will also need to identify potential cost benefit savings across a range of health, social care and support services to fully understand the impact of the model.

Question 2. Scotland has a determined policy environment which understands what is needed to end homelessness and the role of Housing First in achieving it.

What policies frame the work of your organisation or sector and should be considered when starting and scaling up Housing First?

A rights-based approach is crucial and delivering this approach should not be undermined by a lack of resources which leads to lack of choice for people with their housing, and/or a struggle to access the right support services at the right time. Long term investment is required to provide the right support services and ensure an ambitious plan to build the high-quality social homes in the right places is realised.

Housing First must be part of an integrated and long-term Homelessness Strategy. HF can potentially provide a very successful solution for a very important, but relatively small group of homeless people who have multiple and complex needs. There are significant numbers of people who are struggling to keep and find a home in Scotland, but do not require HF, and HF must therefore be considered within the wider context of the housing emergency, and as one part of the solution which is required.

These figures highlight the scale of the housing emergency - every 17 minutes a household becomes homeless in Scotland and we currently have over 14,000 households in temporary accommodation, nearly 6000 children were homeless in 2019/20, with 132,000 households on housing waiting lists, many of whom could tip into homelessness at any point due to their precarious housing situation.

Question 3. This question is for partners, all sectors, who are already involved in delivering Housing First locally.

What to do more of. From your experience of planning or delivering Housing First, do you have any other key learning take-aways that we can share with others?

While we do not provide Housing First services in Scotland, we do support people through our housing advice services who are applying for HF tenancies. There has been much progress with some positive results, for example most people who were able to access HF have been able to sustain their tenancies at a high rate. However there have also been some teething problems and we also need to understand the structural factors/barriers which have prevented the HF model being rolled out as intended during the pathfinder project.

We have asked our hub teams to reflect on their experience of supporting clients to access HF. The information below is a snapshot of their experiences, which we hope will help to further shape the development of the HF model. Feedback from Shelter Scotland housing advisers has shown there have been problems for clients we have worked with in accessing HF, or getting the right support and a settled home, even though they were accessing Housing First. This is possibly due to a number of issues such as: the impact of the pandemic; the housing system being complex; the lack of a fully developed joined up approach; lack of training/experience; the lack of social homes; plus errors which are being made which exacerbate the situation for the clients.

From this feedback it would be good to get further clarity on:

- eligibility criteria to access HF
- how the backlog is being managed which has resulted in waiting lists closing in some areas
- how to access a HF property through local allocations systems
- calling for a review of all allocations policies and how they impact on how accessible settled accommodation is for those who require HF.

Some examples of cases our advisers have been involved in are detailed below – this is a snapshot and we are therefore not saying these issues are necessarily widespread, but they do indicate there may be some issues which need to be addressed before rolling out the HF model more widely.

On a positive note we do know that a switch to proactive engagement with potential HF client's in temporary accommodation has proved successful in one area of Scotland and they are rolling that approach out to more temporary accommodation locations. They have also offered for the first time a property to a couple, so they are slowly expanding the scope of project too. However, there are it seems occasional issues with the level of support provided, with RSLs sometimes struggling to cope, as the support was not available, and their local housing teams were put under a lot of pressure to manage these tenancies.

We have also seen a few cases of people wanting to access HF, but the waiting list has been closed due to a backlog, which we assume is possibly due to impact of covid 19, lack of capacity and/or lack of settled homes. Clarity on why the backlog has emerged and how the backlog will be managed, with likely timescales would be appreciated. We have for example one client who has been living in his mother's

shed since the middle of May, having been released from prison early because of covid. He has a long history of health issues and substance/alcohol abuse which has led to permanent neurological damage. He made a homeless application at the time of his release in May and our adviser was told by the homeless team that he would have been an ideal candidate for Housing First, however they were not taking any referrals at the time. It is now December and he is still in the shed, after several attempts to find temporary accommodation for him. He has struggled to engage with addiction and housing support services, and sustain the temporary accommodation offered to him. If a Housing First approach had been taken and had been available, this might have moved things forward for him, but he has not had the chance to find out. No timescale has been given on when referrals will be reopened.

In another case errors have been made resulting in a long delay in accessing a settled home. The Housing First support worker had been helping a client to apply for a home through the allocation process, but the wrong code was accidentally being used for months, which has meant a substantial additional delay in trying to access a settled home for him. The complexity of the allocation processes may be at fault too, and some work on how to streamline applications would be useful.

Another client reported a very stressful experience, saying he didn't feel he got the support he needed to find and sustain a new tenancy, as his HF support workers changed several times and he did not get enough information. In the end after months of distress, he managed to get a settled flat, but unfortunately without any carpets, furnishings and white goods he needed, as the application for funding for these items had accidentally not been submitted by the HF support worker. This seems to indicate issues with high staff turnover, resulting in a lack of relationship being built up with the client, with the result his needs were not met and the necessary actions to help him sustain his tenancy were not completed.

In another area, before COVID started there were at least 3 clients who met all the HF criteria, but struggled to be accepted onto the HF programme – possibly seen as 'too chaotic'. Our advisers have had to really push for these clients to be accepted onto HF. Advisers have also reflected that it would be ideal if there was less waiting times for accessing HF – even 6 weeks for example is a long time to have someone waiting, when they have a chaotic lifestyle due to their multiple and complex needs and they do not particularly trust services. Earlier intervention would be much better.

Clients who disengage regularly from support have also struggled to get back onto HF when they are ready to re-engage, and this significantly reduces the likelihood of a positive outcome for them. An assessment of the processes and procedures to re-engage clients who have struggled to stay connected would be useful, as this client group which HF is targeted at, do often disengage due to their ongoing issues with mental health, addictions etc.

Question 4. The risk of experiencing homelessness is not distributed equally, and the impact of homelessness does not affect everyone in the same way.

To what extent do these equalities considerations offer local partnerships a clear starting point for Housing First? Please let us know if anything is missing or could be expanded on.

Accessing a settled home is problematic for many people and it is particularly hard for those with multiple and complex needs. And for people with multiple and complex needs, who are for example also from LGBTQ and BAME communities it can be even more problematic to get the support that is required. Additional awareness training and support for HF workers is important to fully understand the barriers these groups face and how to best support them to find and sustain a tenancy.

Information from our website which may be of use

Housing discrimination

Unlawful discrimination on the basis of sex, sexual orientation, gender reassignment, disability, pregnancy or maternity, race, religion or belief by people with the right to dispose of, and managers of, premises is prohibited by legislation.[\[1\]](#)

For more information see the [Equality Act 2010 provisions against housing discrimination](#) page.

Any person who feels that s/he has been discriminated against should be referred to a specialist legal adviser with practising experience in this area, or should be advised to call the helpline of the [Equality Advisory and Support Service](#).

Equality and Human Rights Commission (EHRC)

The [Equality and Human Rights Commission](#) offers advice and assistance to anyone who has been discriminated against on the grounds of sexual orientation or gender identity, as well as race, colour, nationality or ethnic or national origins, disability, age, religion or belief.

A recently published report (Tuesday 15 December) from a Scottish Government Working group called – **‘Improving outcomes for women and children experiencing domestic abuse’** which may be useful. The full report is available here <https://www.cih.org/media/mwwbsnlt/improving-housing-outcomes-for-women-and-children.pdf>

Question 5. How will we know it’s working? Housing First is built around a series of principles to meet, rather than a series of specific tasks or activities to deliver.

Does the professional peer-review approach to assuring quality and fidelity match your expectations? Are there other mechanisms to achieve this?

A robust evaluation framework must be developed for any housing model, and it would be good to ensure that HF is fully embedded as part of the overall housing/homelessness strategy, with the Scottish Housing Regulator becoming the independent evaluator of the service, which protects the interests of tenants, people who are homeless, and others who use social landlords' services.

Question 6. Each partner brings something unique and important to scaling up Housing First, but also has a set of expectations of what they need in place to enable them to deliver.

Overall Target. How does this compare to your understanding of the scale of demand for Housing First in Scotland?

Assessing the level of need is quite problematic, due to level of hidden homelessness and, for example how women access services i.e. not through the usual homelessness channels. We’d therefore approach quantifying the numbers of people who will require HF very carefully. We have as mentioned earlier seen a backlog of cases meaning waiting lists were closed and our clients have struggled to get access to HF. Fully understanding the barriers which are causing the backlog is important for example, how the lack of social housing has impacted on access to a suitable settled home, what the immediate and long term impact of pandemic will be and if/how allocations policies/processes are hindering applications.

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