SYSTEMIC RACES IN

and Scotland's housing emergency





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About this report

This is a joint report by Shelter Scotland and the Coalition for Racial Equality and Rights (CRER), examining the relationship between systemic racism and the housing emergency. In this report we have sought to bring together CRER's expertise on race and ethnicity and Shelter Scotland's expertise on the housing emergency, to provide a comprehensive understanding of how the housing emergency has had a disproportionate impact on Black and Minority Ethnic groups. You can find out more about our respective organisations below.

Shelter Scotland

Shelter Scotland exists to defend the right to a safe home and fight the devastating impact the housing emergency has on people and society. We work in communities to understand the problem and change the system. We run national campaigns to fight for home.

In communities we support people to fight for their housing rights and for those we cannot directly help, we secure change through our campaigning and advocacy work. Real change in the policies that say what should be done and the resources provided to realise this, and real change in the frontline practices that too often mean people are denied their basic legal right.

CRER

The Coalition for Racial Equality and Rights (CRER) is a Scottish anti-racism charity based in Glasgow. We are focused on working to eliminate racial discrimination and harassment and promote racial justice across Scotland. Through capacity building, research and campaigning activities which respond to the needs of Black and Minority Ethnic communities, our work takes a strategic approach to tackle deep-rooted issues of racial inequality. CRER takes a rights-based approach, promoting relevant international, regional and national human rights and equality conventions and legislation.

A note on terminology

This is a joint report by Shelter Scotland and the Coalition of Racial Equality and Rights (CRER) exploring the relationship between systemic racism and Scotland's housing emergency. While we have produced this report collaboratively both organisations may use differing terminology to discuss anti-racism and to complete relevant analysis of equalities data. In this report Shelter Scotland have opted to use "Black and People of Colour" while CRER use "Black and Minority Ethnic". We recognise that these terms may not work for everyone and that language used to describe race and ethnicity can be fluid. For clarity we have provided definitions of key terms in the glossary on page 29.

Introduction

This joint briefing sets out how Scotland's housing emergency is entrenching systemic inequalities around race. Structural racism has always existed in Scotland, but political inaction on housing doesn't affect all groups equally, with marginalised communities being placed at the sharp end of the housing emergency. Without radical change to our housing policy and a dramatic increase in the number of social homes, actions to tackle systemic discrimination risk being insufficient.

The Scottish Government has a clear message on equality. In the 2025 Programme for Government, the First Minister stated, "We must take action to tackle persistent inequality and to advance equality of opportunity for everyone in Scotland, supporting those who are most disadvantaged and who face the greatest barriers to realising their rights". However, evidence from across the anti-poverty sector suggests this ambition is not being realised in practice, with Black People and People of Colour (BPoC) experiencing increasing rates of poverty, homelessness and disadvantage. At the same time, the Scottish Government has recognised that Scotland is in the grip of a housing emergency, with a new household becoming homeless every 15 minutes and 17,240 households now trapped in temporary accommodation². There has been little acknowledgement, however, of the fact that a disproportionate number of those experiencing homelessness are BPoC and that there is significant evidence of systemic racism within Scotland's housing system.

People from Black and Minority Ethnic backgrounds face a range of barriers to accessing safe, high-quality and affordable housing. BPoC are less likely to own their own home and more likely to be trapped paying exorbitant private rents. This, combined with higher prevalence of poverty and lower average wages has created the perfect storm for homelessness. As a result, **Black and People of Colour are more than twice as likely to lose their home compared to White people.**

Unless systems and institutions in Scotland are actively committed to eradicating systemic racism, they are at best ignoring the drivers of this disadvantage and at worst further entrenching it.

¹ <u>Scottish Government (2025) Programme for Government 2025 to 2026 - gov.scot</u>

² Scottish Government (2025) Homelessness in Scotland: 2024-25 - gov.scot

Summary

This report sets out the relationship between Scotland's housing emergency and systemic racism. While commitments have been made by the Scottish Government to address both systemic inequality and homelessness, evidence shows that:

- Black People and People of Colour (BPoC) in Scotland remain at the sharp end of the housing emergency and are 2.5 times as likely to experience homelessness compared to White Scottish households.
- BPoC are more likely to reside in Scotland's increasingly unaffordable private rented sector, leaving them disproportionately impacted by high rents and shortages in adequate social housing.
- BME groups are more than twice as likely to struggle to pay their mortgage or rent costs as their White Scottish/British counterparts.
- BPoC are more likely to be refused access to their housing rights, making up 36% of those unlawfully denied temporary accommodation, while only making up 15% of homeless households.
- BPoC are more likely to experience unsuitable temporary accommodation, experiencing 35% of breaches of the Unsuitable Accommodation Order.
- Despite being one of the groups most at risk of both poverty and housing inequality, BPoC are now routinely scapegoated and blamed for the housing emergency. False narratives about the effect of migration on housing availability alongside the conflation of the experiences of BPoC with migration and asylum deepen inequality and overlook systemic racism present in the mainstream housing system.
- Current government housing strategies lack sufficient measures to address systemic racism, with little to no reference to racial inequality.

We make a series of recommendations for various actors at the end of the report. In summary:

The Scottish Government must;

- require social landlords to publish an anti-racism policy which should be evaluated by the Scottish Housing Regulator
- utilise existing frameworks to create a coherent plan to reduce racial inequality in housing
- standardise and improve data collection and quality and usage
- build enough social homes to reduce homelessness and alleviate pressure on the system

The UK Government must;

- restore Local Housing Allowance rates
- ensure Home Office asylum processing doesn't create homelessness by design
- review whether practices and policies are in line with public sector equality duties related to fostering good relations between groups with shared protected characteristics
- Local authorities must commit to eradicating racism within housing services

Systemic Racism in Scotland

Racial inequality is deeply entrenched across multiple aspects of life in Scotland, impacting Black and Minority Ethnic groups' experiences and outcomes in employment, education, health, housing and more

The term 'racism' is often poorly understood³. For many, racism is only recognised as an interpersonal matter - characterised by negative attitudes and biases towards groups of people because of their skin colour, nationality and ethnic origins. However, in reality, racist views and ways of thinking manifest at cultural, institutional and systemic levels to become a structuring force in Scottish society.

For example, within institutions, racism can stem from directly racist actions and attitudes, but also when policies, processes and practices have been planned without regard to the potential impacts on people from Black and Minority Ethnic backgrounds. This occurs when decision-makers without lived experience of racism and racial inequality treat their experiences as universal and fail to take an explicitly anti-racist approach, which recognises racism as a systemic issue that must be proactively countered. As a result, decision-making can reflect the preferences, priorities, social norms and perspectives shared by White Scottish and British people and disregard those of Black and Minority Ethnic groups.

At a structural level, this contributes to policies and systems that disadvantage and negatively impact people from Black and Minority Ethnic backgrounds, resulting in poorer outcomes compared to their White Scottish and British counterparts, further entrenching racial inequality. This means that racism influences the full range of Scotland's economic, political, social and cultural systems. Failing to consider or actively dismissing the diverse needs of Black and Minority Ethnic groups results in poorer experiences and outcomes further entrenching structural racism across the country.

These inequalities are evident across Scottish society, with systemic racism contributing to racial disparities in employment, education, health, criminal justice, housing and more:

- people from Black and Minority Ethnic backgrounds are more than twice as likely to experience poverty as people from White backgrounds⁵
- people from Black and Minority Ethnic backgrounds experience higher levels of un- and under-employment than their White counterparts, with a 10% gap between employment rates for White groups and BME groups⁶
- despite higher levels of educational attainment among BME groups, people from BME

³ Coalition for Racial Equality and Rights (2016). <u>Changing the Race Equality Paradigm</u>.

⁴ Coalition for Racial Equality and Rights (2025). <u>Racism in Scotland</u>.

⁵ Joseph Rowntree Foundation (2025). <u>Poverty in Scotland 2025</u>.

⁶ Scottish Government (2024). <u>Scotland's Labour Market Insights</u>.

backgrounds consistently face significant barriers to finding adequate work⁷

- inequalities tied to the labour market contribute to reduced income, savings and assets among Black and Minority Ethnic households, which shape patterns of generational wealth^{8 9}
- people from Black and Minority Ethnic backgrounds experience a range of poor physical and mental health outcomes tied to socio-economic and environmental factors and racism in healthcare settings¹⁰
- some ethnic groups are significantly over-represented in Scotland's prison population, and are more than twice as likely to be stopped and searched by the police¹¹

To learn more about the nature and extent of racial inequality, readers may want to visit the 'Racism in Scotland' and 'Ten things we need to say about racism' pages on CRER's website.

⁷ Coalition for Racial Equality and Rights (2024). <u>Ten things we need to say about racism</u>.

⁸ Scottish Government (2025). <u>Poverty and Income Statistics - additional poverty analysis 2025</u>.

⁹ Scottish Government (2025). Wealth in Scotland 2006-2022.

¹⁰ Coalition for Racial Equality and Rights (2024). <u>Ten things we need to say about racism</u>.

¹¹ Coalition for Racial Equality and Rights (2025). Racial Inequality in Scotland - State of the Nation 2025: Employment, Housing, Justice, Community Cohesion and Mental Health.

Housing Inequality in Scotland

Black and Minority Ethnic communities face significant inequalities in their access to safe, affordable and adequate housing, contributing to overcrowding and over-representation in the most deprived parts of Scotland

Black and Minority Ethnic groups in Scotland are impacted by a wide range of housing inequalities, influencing the accessibility of home ownership, people's experiences within rented housing, and the type, size and quality of homes people live in.

Data from Scotland's 2022 Census shows that:

- just 50% of BME people in Scotland are homeowners compared to nearly 70% of White Scottish/British people
- Black and Minority Ethnic groups are significantly over-represented in social housing and the private rented sector: 15% of private renters come from BME backgrounds, despite only comprising 7.1% of the national population, and 27% of BME people live in social housing compared to just 10% of people from White Scottish/British backgrounds
- Black and Minority Ethnic groups are nearly five times as likely to live in an overcrowded household as their White Scottish/British counterparts - an inequality directly cited as a driver of disparate infection and death rates during the COVID-19 pandemic
- Black and Minority Ethnic households in Scotland are 2.4 times as likely to have no form of central heating in their home compared to White households
- people from Black and Minority Ethnic backgrounds in Scotland are more likely to live in Houses in Multiple Occupation (HMOs) with unrelated people, even when excluding students
- people from Black and Minority Ethnic backgrounds are 60% more likely to live in the most deprived parts of Scotland than their White Scottish and British counterparts, with Black and Arab groups particularly over-represented in Scotland's most deprived neighbourhoods¹²

Inequalities like these contribute to Black and Minority Ethnic households being disproportionately impacted by Scotland's housing emergency and the increasing unaffordability of housing.

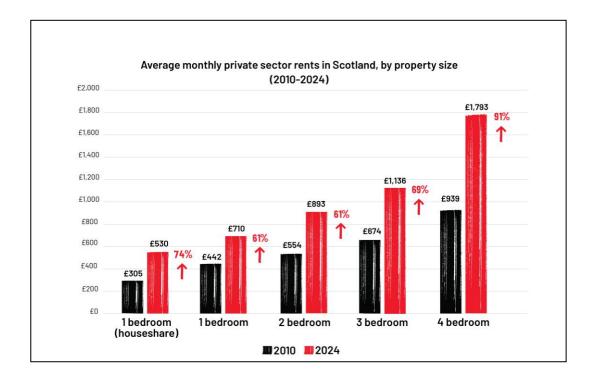
¹² Staddon Foster, L. and Macpherson, S. (2024). <u>Ethnicity and Socio-economic Deprivation in Scotland</u>. Coalition for Racial Equality and Rights (CRER).

Racial Inequality and Rent

Black and Minority Ethnic groups in Scotland are disproportionately impacted by rising rents and are bearing the brunt of the affordability crisis

With Black and Minority Ethnic groups being less likely to own their homes, households have become concentrated in Scotland's private rented sector.

Since 2010, private rented housing in Scotland has become increasingly expensive¹³. The average private rent for a 2-bedroom property has increased by around £440, representing a 61% rise. Rents for larger properties have seen even greater increases, with the average rent for 3-bedroom homes and 4-bedroom homes rising by 69% and 91%, respectively.



Within this context, we can understand Scotland's housing emergency as the culmination of issues in both supply and affordability, as rents have risen far beyond what would be expected from consumer price inflation alone. While many communities feel the squeeze of rising housing costs, within the context of systemic racism and structural inequality, Black and Minority Ethnic communities are disproportionately impacted by this.

At a population level, Black and Minority Ethnic households are more likely to live in private rented housing than their White counterparts, but they are also more likely to live in the parts of Scotland that have seen the greatest rent increases.

Scotland's 2022 Census shows that Glasgow and Edinburgh are home to around 34% of

¹³ Scottish Government (2024). Private Sector Rent Statistics, Scotland, 2010 to 2024.

Scotland's BME population, with a further 8% living in East Lothian and Midlothian. The latest private rent statistics show that, since 2010, the average rent for a 2-bedroom property in Lothian (which includes Edinburgh) and Greater Glasgow has increased by 82% and 104%, respectively. Therefore, by virtue of where Black and Minority Ethnic people are most likely to live, BME households are disproportionately exposed to the largest rent increases. In the same period income for all households has not been increasing at a commensurate rate, with the median household income increasing by just 6% between 2010 and 2022^{14} .

This is further exacerbated for Black and Minority Ethnic households who are on average more likely to be on low incomes¹⁵. These factors combined show how unaffordable housing has a particular impact on marginalised communities both because they are disproportionately affected by the increased cost of private rented accommodation but also because of broader systemic racism within the economy which has seen wage growth continue to stagnate.

While there has been some action to control the high cost of private rented accommodation through the Housing (Scotland) Act 2025 it remains to be seen what the impact of current proposals for rent controls will be in practice. With rent caps not tied to wages, their impact could be limited as incomes continue to fail to keep pace with rent increases. Given the prevalence of private rented accommodation for families from Black and Minority Ethnic backgrounds there must be specific consideration of how measures such as rent controls should be best designed to serve marginalised communities. Additionally it is particularly important that all measures to increase housing affordability such as rent controls are fully funded and supported to ensure they meet their stated ambitions.

Demographic factors can also feed into the disproportionate impact of the housing emergency, as Black and Minority Ethnic households are more likely to comprise four or more people than White households¹⁶. Given that four-bedroom properties across Scotland have seen average rent increases of 91% since 2010, it is becoming increasingly difficult for these larger households to afford adequately sized homes.

Similarly, in social housing, larger households are disadvantaged by a limited supply of properties with four or more bedrooms which cannot keep up with demand, contributing to longer average waiting times and higher rates of overcrowding¹⁷. For example, across Edinburgh's four housing localities, the average wait time for a four-bedroom property ranges from 1,106 days (3 years) to 2,615 days (7 years, 2 months)¹⁸. Given that 26% of BME households in Edinburgh comprise four or more people, the limited supply of adequately sized homes has a clear and disproportionate impact on Black and Minority Ethnic communities' experiences of housing¹⁹.

¹⁹ National Records Scotland (2024). <u>Scotland's Census 2022: Household size and Ethnicity, Edinburgh</u>.

¹⁴ Institute for Fiscal Studies (2024) <u>Press Release - Income Growth</u>

¹⁵ Scottish Government (2025). Poverty and Income Statistics - additional poverty analysis 2025.

¹⁶ National Records Scotland (2024). <u>Scotland's Census 2022: Household size and Ethnicity</u>.

¹⁷ Ryder, B. (2025). <u>Still waiting for a home: Stories of people waiting for social housing</u>. Scottish Federation of Housing Associations and Wheatley Group.

¹⁸ EdIndex (2025). Waiting Times for a Social Rented Home in Edinburgh, 2024-25.

With the prospect of home ownership being unattainable to many, and the social housing sector being stretched beyond capacity, many households are left with no choice but to do what they can to afford unsustainably high rents in the private rented sector.

Costs and their consequences

Structural inequality has left Black and Minority Ethnic households in Scotland more at risk from the harshest impacts of the housing emergency, contributing to fuel poverty and food insecurity, as well as higher rates of poverty and homelessness

With rents and mortgage costs rising, households are having to spend an increasing proportion of their income on housing. For many, this means compromising on the size, quality, location and conditions of homes, or making difficult choices to ensure they can afford their housing. This includes cutting back on essential household expenses (such as food, heating and clothing), depleting any savings they may have, as well as moving out of their homes and local communities because they can no longer afford to stay. Due to structural racism and its manifestations in housing and the labour market, Black and Minority Ethnic households are disproportionately bearing the brunt of this compared to their share of the population.

Black and Minority Ethnic households in Scotland spend a greater proportion of their income on housing compared to the national average, leaving them with less for other essential expenses, savings and disposable income. Scottish Government statistics from 2021-24 show that BME households, on average, spend 21% of their income on housing compared to the national average of 9% – resulting in a £218 difference in weekly household income after housing costs have been paid²⁰.

This is particularly pronounced for households supported by the Local Housing Allowance (LHA), which has become significantly less robust over the past decade and has been refrozen since April 2025. Rising rents and reductions to the LHA have contributed to it covering a smaller proportion of people's housing costs, affecting those with low incomes and high household expenses the most. Within the context of systemic racism, these cuts disproportionately disadvantage Black and Minority Ethnic households. For example, using data from England, the Joseph Rowntree Foundation found that, in the period between 2011 and 2025, cuts to the LHA have cost Black adult households £957 a year and Asian households £835 a year, compared to £622 for White households²¹. As a result, BME households are more likely to struggle to balance their housing costs among other essential expenses.

According to the Scottish Household Survey, BME groups are more than twice as likely to struggle to pay their mortgage or rent costs as their White Scottish/British counterparts.

But what happens when there are no feasible options for affordable housing?

For some households, unaffordable rents force them to leave their homes. This was investigated by the 2023 Scottish Household Survey, which asked households whether they might have to move because of housing costs. Over 7% of BME respondents reported that they might have to move due to housing costs, making them almost three times as

likely to
20 Scottish Government (2025). <u>Poverty and Income Statistics - additional poverty analysis 2025</u>.

²¹ Joseph Rowntree Foundation (2024). <u>Stop the freeze: permanently re-link housing benefits to private rents</u>.

be in this position compared to White respondents²².

Others are forced to live in a smaller home than they need. It is, therefore, unsurprising that Black and Minority Ethnic households in the private rented sector are, on average, nearly four times as likely to live in an overcrowded home as White Scottish/British households²³. This reflects a broader pattern of BME households being priced out of adequate housing and having to rely on increasingly informal, exploitative and unlawful housing²⁴.

Rising housing costs are also directly responsible for pulling some households into poverty. Black and Minority Ethnic households in Scotland are more than twice as likely to live in poverty after their housing costs as White Scottish and British households²⁵.

Those who have no way of meeting these costs are threatened with homelessness.

Homelessness in Black and Minority Ethnic communities

People from Black and Minority Ethnic backgrounds are 2.5 times as likely to experience homelessness as White ethnic groups

Scottish Government statistics from 2024-25 show that, where ethnicity data is held, 15% of those assessed as homeless (or threatened with homelessness) come from Black and minority ethnic backgrounds²⁶. This means that, on aggregate, Black and Minority Ethnic groups are 2.5 times as likely to experience homelessness as White ethnic groups, and more than twice their expected rate, given their share of the population.

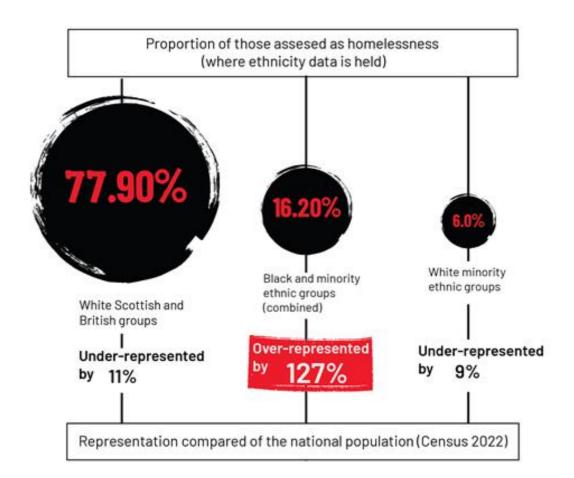
²² Scottish Government (2024). Scottish Household Survey results - Results of the 2023 survey.

²³ National Records Scotland (2024). <u>Scotland's Census 2022: Occupancy Rating, Household Tenure, Ethnicity</u>.

²⁴ Generation Rent (2025). A cycle of inequality: minority ethnic renters' experiences of discrimination.

²⁵ Scottish Government (2025). <u>Poverty and Income Statistics - additional poverty analysis 2025</u>.

²⁶ Scottish Government (2025). <u>Homelessness in Scotland 2024-25 - Equalities tables</u>.

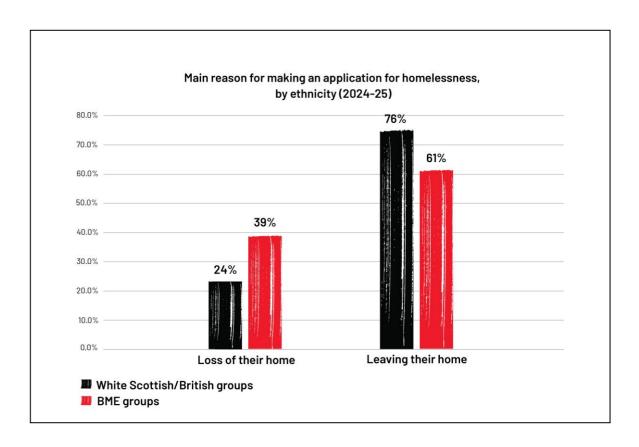


Mixed or multiple ethnic groups	0.70%	Under-represented by	38%
Asian ethnic groups (combined)	2.40%	Under-represented by	38%
African groups	2.70%	Over-represented by	151%
Caribbean or Black groups	0.50%	Over-represented by	269%
Arab groups	3.70%	Over-represented by	812%
Other BME groups	6.20%	Over-represented by	1128%

Inequalities are also evident in people's experiences prior to making an application for homelessness assistance. While official statistics cannot capture the full and unique circumstances behind individuals' experiences of homelessness, data is published on the primary reasons for their application and any experiences of rough sleeping.

People from Black and Minority Ethnic backgrounds are more likely to have experienced rough sleeping before making an application for homelessness assistance. In 2024-25, 11.6% of applicants from BME backgrounds had experienced rough sleeping the night before making an application, more than double the rate of White Scottish/British applicants (4.6%).

Black and Minority Ethnic groups are also more likely to become homeless due to reasons related to losing their homes²⁷ (rather than having to leave home) than people from White Scottish and British backgrounds, reflecting structural disadvantages linked to systemic racism and housing inequality.



For BME people losing their homes, this is often attributed to the termination of tenancies due to rent arrears, mortgage foreclosure and landlord actions. For those having to leave their accommodation, key drivers include being asked to leave, household disputes and experiencing harassment. However, more detailed analysis of these drivers is limited by how the data is published; over 40% of the reasons specified by applicants are combined into the categories 'Other reason for loss of accommodation' and 'Other reason for leaving accommodation / household'.

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²⁷ Scottish Government (2025). <u>Homelessness in Scotland 2024-25 - Equalities tables</u>.

Access to housing rights for BPoC

Scotland is often praised for housing rights that are stronger than in the rest of the UK²⁸. But the housing emergency means that realising those rights in practice has become progressively more difficult over time due to the cumulative effects of austerity, which has led to inadequate funding of both homelessness prevention and homelessness services themselves, and insufficient investment in and delivery of new social homes. Thousands of families are now turned away from help that they are legally entitled to and forced to live in often unsuitable temporary accommodation, which falls below minimum standards.

However Scotland's national homelessness statistics paint a stark picture for BPoC households in particular, who are amongst the most likely groups to be refused their housing rights. This can be evidenced by the levels of overrepresentation of BPoC in gatekeeping statistics, which record households that are not offered temporary accommodation despite being legally entitled to it. From the recorded cases of gatekeeping, we can determine that on average, there are 118 instances where households of colour are denied the temporary accommodation they are legally entitled to every week²⁹.

In 2024/25 36% of all instances of households not being offered temporary accommodation when legally entitled were experienced by BPoC households, despite making up 15% of all households assessed as or threatened with homelessness³⁰.

Any breach of someone's rights to temporary accommodation is unacceptable, but the rate at which people of colour experience gatekeeping has seen sharp rises in recent years. In 2018/19 instances of BPoC households being turned away from temporary accommodation accounted for 11% of all recorded gatekeeping, compared to 36% now-showing that inequality is widening for BPoC groups³¹. Qualitative evidence suggests that gatekeeping of BPoC households may happen due to lower awareness of housing rights amongst BPoC groups³². However, in some instances, BPoC are presumed to have no entitlement to temporary accommodation because of assumptions or false perceptions about their legal entitlements due to their immigration status and either face their applications for homelessness assistance being wrongfully rejected or are prevented from making an application at all. It is therefore likely that the true prevalence of the issue is even greater due to our inability to determine how many unrecorded cases of gatekeeping happen every year.

Under Scots law, people from an asylum or refugee background who have stayed in Home Office accommodation are entitled to homelessness assistance from any Scottish local authority without the need to demonstrate a local connection to any authority. Scottish

²⁸ Scottish Health Equity Research Unit (2024) Housing in England and Scotland

²⁹ Scottish Government (2025). <u>Homelessness in Scotland 2024-25 - Equalities tables</u>.

³⁰ Scottish Government (2025). <u>Homelessness in Scotland 2024-25 - Equalities tables</u>.

³¹ Scottish Government (2019) <u>Homelessness in Scotland: 2018 to 2019 – equalities breakdown</u>

³² Menezes, D., Netto, G., Hasan, S. (2023), <u>Minoritised Ethnic Access to Social Housing in Scotland at Key Transition Points</u>. Shelter Scotland and CEMVO Scotland.

local authorities can refer people back to England or Wales if they are found to have a local connection there, but not if the applicant has stayed in Home Office accommodation immediately prior to their application. Unfortunately, Shelter Scotland has supported many clients who have been in this situation who have been turned away from a Scottish local authority and refused assistance. In many instances, this refusal occurs even before an application has been taken, an assessment has been made, or interim temporary accommodation has been provided. While not all refugees are People of Colour and vice versa, this issue particularly impacts BPoC who make up the majority of the refugee community in the UK.

Case study

Mubarak is a Shelter Scotland client who was granted refugee status in Northern Ireland in 2023 while living in Home Office accommodation. Mubarak was forced to flee due to being subjected to racially motivated crimes hoping to settle in Scotland. However, when Mubarak requested homeless assistance from the local council, he was advised he would need to return to Northern Ireland. After explaining the reasons he could not return, Mubarak was advised the local authority "can only help citizens of [local authority]". Despite having every right to access help, Mubarak told us he was made to feel "illegal".

Case Study

Mohamed, a Shelter Scotland client in 2025, told us he felt he was discriminated against in his search for a home for his family when he was granted refugee status.

"When I got status, I moved to Scotland, but they rejected my application and told me I don't have a local connection and so am not eligible and they told me to go back to England. I was shocked and I felt the difficulties of life with my status. I felt homeless and helpless. I felt my hands were tied and I didn't have the freedom to do what I really like and what I wanted to do. I wasn't feeling comfortable where I was living as I faced racism from the council official and had to file complaints against him. The situation where I was staying, I was having troubles and problems, facing the same racist treatment. That's why I tried to move to Scotland rather than staying in England."

It is local authorities who are the duty bearers and have legal responsibility to provide assistance to households under Scots law. However, we know that the continual under-resourcing of local services by national government has resulted in this practice increasing: local authorities are under intense pressure to house more families than they have housing for. While it is clear that practice at the local authority level must improve to ensure that racist profiling does not inhibit access to housing rights for BPoC, the Scottish Government must act urgently to ensure that local authorities have adequate funding to support all households experiencing homelessness.

Temporary Accommodation

Thousands of households are trapped in temporary accommodation due to the lack of affordable social housing in Scotland. Research commissioned by Shelter Scotland showed that temporary accommodation can have serious effects in particular on children's safety, health and education both due to the quality of the accommodation provided and as the shortage of suitable accommodation means it is often inappropriate for their needs³³. Given that homelessness in childhood is a large factor in predicting homelessness in adulthood, we can observe how systemic racism is baked into our housing system, leading to cycles of homelessness³⁴.

The housing emergency means that people are often housed in temporary accommodation deemed unsuitable by law. The Unsuitable Accommodation Order (UAO) sets out minimum standards of temporary accommodation and should lead, in theory, to ensuring that no one who experiences homelessness is forced to stay in accommodation that harms their health and wellbeing³⁵. However, in 2024/25 there were 7,850 breaches of the UAO and statistics show that BPoC households are more likely to be placed in temporary accommodation which is in breach of the UAO.

Despite making up 15% of homeless households, 34% of breaches of the unsuitable accommodation order were for BPoC-led households in 2024/25³⁶.

Routine breaches of homelessness rights through gatekeeping or providing unsuitable temporary accommodation exacerbates inequalities further by relying on people experiencing homelessness to have a knowledge of their own rights and if these rights are breached, have the ability and knowledge to either directly advocate for themselves or contact a supporting organisation such as Shelter Scotland. It is likely to disproportionately affect households who are recent arrivals to Scotland or those with lower English proficiency, meaning BPoC who are already more likely to have lower rights awareness are further unable to ensure their rights are upheld. Additionally, stays in so-called temporary accommodation are now becoming much longer, and statistics show us that BPoC families are subjected to longer durations in temporary accommodation than White Scottish families³⁷.

- BPoC-led households in temporary accommodation wait on average 79 days longer (one third longer) than White Scottish households to move into permanent accommodation.
- African-led households spend the longest time in temporary accommodation of all groups, an average of 388 days 162 days more than the average White Scottish household.

³³ Svirydzenka, Prof N. (De Montfort University), Lakhanpaul, Prof M. (University College London), and Williams, Dr J. (De Montfort University) (2025) In Their Own Words: Children's Experiences in Temporary Accommodation. Shelter Scotland.

³⁴ The Lancet (2017) Young and homeless - The Lancet Child & Adolescent Health

³⁵ Scottish Government (2021) <u>Homeless Persons (Unsuitable Accommodation) Order guidance.</u>

³⁶ Scottish Government (2025). <u>Homelessness in Scotland 2024-25 - Equalities tables</u>.

³⁷ Scottish Government (2025). <u>Homelessness in Scotland 2024-25 - Equalities tables</u>.

A commonly cited explanation for this discrepancy is that BPoC households tend to be larger on average than White Scottish households. There is a severe lack of larger properties in the system, and BPoC are therefore more likely to face time stuck in temporary accommodation, but the true picture may be more complex. Larger household size is a factor for multiple reasons. While it is true that some cultures may tend to practice multigenerational living more than White Scottish households, BPoC also experience higher rates of overcrowding due to their increased risk of homelessness38, and Black and Minority ethnic groups are five times more likely to live in an overcrowded household as their White Scottish/British counterparts. This is in part due to the increasing costs of adequately sized homes and reduced household incomes BPoC face because of structural disadvantages in the labour market and barriers to accessing social security. Because of these inequalities, there is a heightened risk of homelessness and overcrowding. It is both incorrect and harmful to frame larger household size as an inherent nature of communities of colour and failure to contextualise this can and does lead to false perceptions about BPoC families, many of which reinforce racist narratives about overcrowding.

³⁸ Scottish Government (2025). <u>Homelessness in Scotland 2024-25 - Equalities tables</u>.

The role of migration and asylum

The statistics presented in this report refer only to people who are either British Citizens or who have been granted leave to remain. However we are unable to disaggregate the experiences of BPoC who are refugees or have experience of seeking asylum from the wider numbers of BPoC in Scotland. This limits our ability to analyse the relationship between homelessness linked to structural racism and homelessness linked to the asylum process. As a result, and because immigration policy is a reserved matter for the UK Government, there is a real risk that vital actions to address this inequality are not seen as a Scottish problem despite evidence that systemic racism is a significant problem for both groups in Scotland. The Scottish Government has made it clear that, due to an ageing population and the impact of rural depopulation, Scotland needs more people to ensure a strong economy³⁹. However, there is increasing rhetoric that suggests that the housing emergency is caused by overpopulation and that we simply do not have space to accommodate people seeking a new life in Scotland from overseas. This rhetoric is disproportionately targeted at BPoC groups in Scotland who have experienced an increase in racism and hate crime in recent years⁴⁰.

While data does show a growing number of people arriving in Scotland from overseas, the conditions for the housing emergency were set long before this increase began. The housing emergency has been caused by decades of underinvestment in new social housing. We have seen a long-term decline in our social housing stock, which has allowed for an unsustainable growth in profit-led, often unaffordable private rented accommodation. This has left people at increased risk of homelessness with wages not keeping pace with rents, and people being increasingly priced out of the highest demand areas, especially in our largest cities.

In turn, we have failed to adequately replace social homes that were lost to the failed Right to Buy policy and failed to build the type of houses we need to reflect a changing society, in the places where people both want to, and increasingly have to, live to access jobs and services.

Research commissioned by Shelter Scotland, Scottish Federation of Housing Associations, and the Chartered Institute of Housing Scotland, shows that the Scottish Government must deliver at least 15,693 affordable homes each year over the next five years to start to reduce affordable housing need⁴¹. This is higher than previous targets, and the research attributes this growth largely to a failure to meet what it terms 'backlog housing need', rather than migration. But Scotland has seen a decline in the number of social homes built with affordable housing statistics showing an 18% decline in the number of social homes completed between 2021/22 and 2024/25⁴². In short, the Affordable Housing Supply Programme is failing to deliver for Scotland regardless of the growth of the Scottish population.

³⁹ Scottish Government (2025) Migration - Meeting Scotland's Needs - gov.scot

⁴⁰ Procurator Fiscal (2025) <u>Hate Crime in Scotland 2024-25 | COPFS</u>

⁴¹ Marshall, M., Watkins, C., Keskin, B., Dunning, R., Ferrari, E. (2025) <u>Affordable Housing Need in Scotland</u> <u>Post-2026</u>, Shelter Scotland, CIH Scotland and SFHA.

⁴² Scottish Government (2025) <u>Housing statistics quarterly update: new housebuilding and affordable housing supply - gov.scot</u>

The result is a system that cannot cope with any significant change to the usage of homelessness support, regardless of its source. The Scottish Housing Regulator has acknowledged that "there is systemic failure in the delivery of some local authorities' services to people experiencing homelessness... the demands on some local authorities now exceed their capacity to respond. This systemic failure means that the quicker processing of asylum claims has had a disproportionate impact on councils such as Glasgow, where many people seeking asylum currently live in Home Office accommodation. The system is overwhelmed by this because it has not been adequately funded, nor is there enough social housing available due to underinvestment which predates any current asylum applicants coming to Scotland. The shift of increasing numbers of people presenting in urban local authorities and slowing in rural and remote areas has not been matched by a similar shift in resources for frontline services from the Scottish Government.

There are also significant process issues which lead to refugee populations being placed at increased risk of homelessness. Because of how the Home Office problematises refugee populations, homelessness is effectively baked into the asylum-seeking process in the UK.

The Home Office manages both asylum housing and asylum cases, and their decisions have a significant impact on local authorities in Scotland, who are given almost no notice that these decisions are being made. The current rules see people prevented from working while they await their claim and then facing eviction from their accommodation within 28 or 56 days of receiving a formal decision. This leaves people with almost no support to find permanent accommodation or means to support themselves in the interim. The UK Government policy is homelessness by design. Both people seeking asylum and local authorities are being deliberately failed by that intentionally broken system.

There are clear routes to reduce refugee homelessness. Where specific resettlement schemes exist for those fleeing war and persecution, we see homelessness reduced significantly as applicants receive dedicated housing support which takes into account people's specific experiences, languages and needs⁴⁴. We saw this in the success of the Ukrainian resettlement scheme, and with adequate resources being made available this success could be replicated for other groups. It is not illegal to claim asylum in any part of the UK, yet people fleeing war and persecution are now more than ever being treated by the system and public narratives as criminals. Without safe and legal routes to the UK we risk seeing these narratives increase. Decades of the Home Office's cruel and dehumanising "hostile environment" policies have made refugee and migrant homelessness worse. The direct result is that refugees and asylum seekers are being scapegoated as the cause of Scotland's housing emergency.

In itself, this mis-assigned blame can result in rising homelessness. Shelter Scotland has seen increasing requests for support from people fleeing racism and harassment that has been connected with recent far-right rioting including targeting of hotels and Home Office accommodation.

⁴³ Scottish Housing Regulator (2025) <u>Engagement plan from 1 April 2025 to 31 March 2026 | Scottish Housing Regulator</u>

⁴⁴ Centre for Homelessness Impact (2024) <u>Homelessness, Refugees and Resettlement in the UK</u>

The failure to meet the backlog in the asylum system has arrived at the same time as Scotland's homelessness system is broken and we are in a national housing emergency and local housing emergencies. These structurally broken systems have caused the weaponisation of the housing system, and people are being failed as a result.

All public bodies in the UK are bound by the public sector equality duty which includes specific provision for the fact that public policy made without due regard to equalities issues can lead to inflamed tensions between groups with different protected characteristics. Practices connected to the processing of asylum applications are undoubtedly putting compliance with the duty to foster good relations between those with and without shared protected characteristics at risk.

Policy responses to systemic racism

Following the wave of outrage in response to the murder of George Floyd in 2020 and the resurgence of the Black Lives Matter movement, the Scottish Government made bold commitments to addressing systemic racism in Scotland. However, there is cause to believe that these were never fully realised in relation to many policy areas including housing and homelessness. The Race Equality Framework and the Immediate Priorities Plan created by the Scottish Government were meant to create a succinct policy framework to address inequality, but contain few references to housing. Likewise, in housing strategies there is little reference to the worsening levels of BPoC homelessness. This includes the Cabinet Secretary's Housing Emergency Action Plan which contained no reference to BPoC homelessness.

One of the most significant actions promised by the Scottish Government in the wake of 2020 in relation to housing was an evidence review for the housing needs of Minority Ethnic groups⁴⁶. The review, completed in 2021, compiles compelling evidence of systemic racism and concludes that BPoC groups face significant inequality in housing and homelessness. But when it comes to action, despite evidence of systemic racism dating back to 2004, the report cannot identify any evidence to suggest significant action or intervention has ever been made to address or remedy this in Scotland.

"What is being done, and what more can be done, to meet the specific housing needs of Minority Ethnic groups? There is very little in the literature that directly addresses this question."⁴⁷

This review should have been the start of a significant programme of work to create those actions, yet since its release in 2021, again, there has been no explicit action taken or committed to by government to tackle systemic racism and race inequality in housing.

Current strategies to end homelessness often make only a passing reference to inequality, and there is even less reference to racism. Likewise, strategies designed to tackle systemic racism do not meaningfully address housing as a source of and lever for inequality. The Scottish Government's flagship Ending Homelessness Together strategy was not subject to an equalities impact assessment before publication, something which could have surfaced some of the inequities hardwired into the broken and biased housing system⁴⁸.

The Scottish Government have shown willingness to commit to bolder action on other forms of inequality, evidenced by their approach to gender and the housing emergency and their acknowledgement of domestic violence as one of the most significant drivers of women's homelessness⁴⁹. This only makes the lack of action on systemic racism more frustrating, especially when we consider how the issues of women's homelessness and racism are deeply connected. For example, Women of Colour experience disproportionately high levels

⁴⁵ Scottish Government (2025) <u>Tackling Scotland's Housing Emergency - gov.scot</u>

⁴⁶ Scottish Government (2021) <u>Housing needs of minority ethnic groups: Evidence review</u>

⁴⁷ Scottish Government (2021) <u>Housing needs of minority ethnic groups: Evidence review</u>

⁴⁸ Scottish Government (2024) <u>The Scope of the EQIA - Homelessness prevention duties: equality impact assessment results - gov.scot</u>

⁴⁹ Scottish Women's Aid (2025) Housing-Scotland-Bill-Stage-3-Scottish-Womens-Aid.pdf

of domestic abuse and often feel they are unable to seek help because of negative or racist experiences with police and support services⁵⁰. While there is no published data that allows us to measure levels of homelessness for Women of Colour specifically, it is logical to expect these would likely be higher as a result of being at increased risk of both domestic violence as a Woman of Colour and homelessness as a Person of Colour. Actions that address some inequalities but not others are likely to fall short if they do not acknowledge interconnected marginalisations. Without a clear, intersectional approach to inequality within housing, we risk no equality issues being meaningfully tackled.

Regulatory Frameworks

Academics suggest that the frameworks required to improve outcomes for BPoC groups already exist in the UK and that Scotland, in particular, is better placed compared to other nations to enforce equality legislation. But they note that there needs to be genuine political will and strong leadership to ensure change is made.

"Regulating for equality would involve: a clearer and more explicit statement of expectations consistent with duties under the equality act; attention to equalities issues within performance monitoring; a programme of targeted reviews and regulatory action in response to evidence of underperformance; and the provision of good practice advice and guidance to support the role of boards and leadership teams within the co-regulatory approach."⁵¹

The Scottish Housing Regulator has powers to compel social landlords to both create antiracism policies and monitor their progress towards equality targets. But rather than robust regulation and accountability the approach to housing inequality, as is the case with other types of inequality, is often solely to increase evidence gathering. Where action is scant, this is blamed on insufficient evidence, leading to a cycle of protracted evidence reviews and high-level action plans which do not meaningfully engage with equality issues. While there is a real lack of data to show the true picture of systemic inequality in Scotland, it is more important now than ever that we develop meaningful routes to move from observation to action. The thousands of families trapped in temporary accommodation do not have time to wait for further evidence reviews before change is made, and the system that houses them is under immense pressure. Failure to take action on systemic racism is a failure to meaningfully alleviate long-term pressure on that system.

Current regulatory frameworks that could create accountability within the system, such as the Scottish Housing Regulator, are not engaging meaningfully with systemic inequality and are therefore missing opportunities to improve practice and outcomes for BPoC groups. Currently social landlords are required to report back to the Scottish Housing Regulator annually on how they meet requirements to record equalities data from their tenants, and they are required to take equalities impacts into account when taking decisions that impact tenants. However, there is no requirement to produce anti-racism plans or assess their services through the lens of systemic racism. A fairer housing system would mean real

⁵⁰ Scottish Government (2024) <u>Executive Summary - Minoritised Ethnic Women's Experiences of Domestic Abuse and Barriers to Help-Seeking: A Summary of the Evidence - gov.scot</u>

⁵¹ UK Collaborative Centre for Housing Evidence (2022) <u>12979_UoS_Equality_in_Housing_Report-13-December-22-1.pdf</u>

action to ensure accountability from social landlords through regulation on anti-racism such as requiring social landlords to produce anti-racism policies with concrete actions for review by the Regulator. Such measures are within the gift of the Scottish Government and Scottish Housing Regulator and could create significant impact and increased action on anti-racism.

The lack of clear political leadership on anti-racism has consequences beyond statutory regulation. There is currently a real risk of baking inaction into emerging strategies to end homelessness. The Housing Act, passed in 2025, unsurprisingly does not refer to high rates of BPoC homelessness. But proposed measures within the bill could have unintended consequences for marginalised groups without a coherent narrative on systemic racism. The 'Ask and Act' duty set out in the bill would compel social landlords and other relevant bodies like Health Boards, Police Scotland and the Scottish Prison Service to ask people about their housing circumstances with the aim of identifying housing need earlier in order to prevent homelessness before it happens. This is without acknowledgement that some public bodies, such as Police Scotland, have identified themselves as systemically racist⁵². There is a valid question of whether Ask and Act could work to its full potential when some of those tasked with asking could hold racist attitudes or false assumptions about People of Colour's entitlement to housing support.

Given the poisonous landscape around housing and immigration, there are also concerns within the refugee support sector that Ask and Act could effectively make public service workers into border guards, as they may be forced to ascertain someone's immigration status to be able to refer someone to the appropriate help. This could, in theory, lead to people not seeking help for fear of deportation.

This is just one example of how innovating policy without full acknowledgement of systemic racism is inherently limited. While there are good examples of strong policy developments to end homelessness taking place, they cannot and will not end the housing emergency without taking into account the experiences of the most marginalised within society and the housing system.

⁵² Police Scotland (2023) <u>Police Scotland Chief Constable Sir Iain Livingstone addresses institutional discrimination.</u> - <u>Police Scotland</u>

Recommendations

We can and must do better to tackle systemic racism within housing. Without robust evidence and bold action there is a real risk that strategies to end homelessness and tackle other forms of housing need will not serve the most at-risk groups. It is time that the Scottish Government commit to action beyond monitoring inequality and start reducing it. Business as usual is not an option and public bodies must not continue to ignore that the system they administer is delivering inequality by design.

The Scottish Government

The Scottish Government must ensure each social landlord publishes an anti-racism policy to demonstrate specific strategic actions towards anti-racism.

They should compel the Scottish Housing Regulator to

- utilise its powers to monitor, assess and report on social landlords against equalities performance indicators by increasing requirements on social landlords to demonstrate actions taken to address inequality. This can be timed to occur alongside the review of the Scottish Social Housing Charter due to be approved by Parliament in 2027.
- enforce existing outcomes and standards contained within the Scottish Social Housing Charter by requiring social landlords to present more comprehensive evidence of tenant satisfaction in relation to anti-racism and discrimination practices.

Utilise existing frameworks to create a coherent plan to reduce racial inequality in housing.

- Review and improve existing action plans and policy frameworks to ensure that race equality, poverty and housing strategies are clearly linked and contain consolidated actions to actively reduce inequality.
 - This must include the Race Equality Action Plan, Housing to 2040 and the Housing Emergency Action Plan which should all contain specific actions to address systemic racism within housing.
- Establish clear accountability mechanisms and political ownership of actions to reduce inequality in housing.
- Take inspiration from the gendered approach to homelessness both to have an intersectional understanding of homelessness for WoC but also to model targeted interventions to reduce BPoC homelessness across the board.
- Issue guidance on the fit and proper person test to ensure that effective enforcement action is taken against landlords found to be practicing racial discrimination in the private rented sector.
- Ensure "Ask and Act" and other relevant parts of the Scottish Housing Bill have clear anti-racist implementation guidance.
- Make adequate funding available to support local authorities to alleviate pressure on staff - this must ensure funding is targeted to cities at increased risk of systemic failure.

Standardise and improve data collection and quality and usage.

- Improve the collection of housing data by protected characteristics to increase our understanding of systemic racism within housing
- This can be achieved by improving the collection of ethnicity-disaggregated homelessness data, using categories in line with Scotland's Census 2022 or the GSS Harmonised Standards for Ethnicity.
- Improving analysis for the role of migration and asylum, i.e. disaggregating statistics by both ethnicity AND migration status, enabling insights into the experiences of people seeking asylum in Scotland and those with citizenship or indefinite leave to remain (with controls for how these factors skew ethnicity statistics).
- Removing offensive groupings of categories such as use of the term "Arabian" in the national homelessness statistics.
- Reviewing the methodology of surveys such as the Scottish Household Survey.
- Take action to meaningfully use equalities data already held and gathered by the Scottish Government. This can be achieved by;
- Producing intersectional analysis of the impact of homelessness policy on BPoC communities that creates defined actions and recommendations.
- Using evidence to inform cohesive strategies to reduce inequality across multiple policy areas such as child poverty and domestic abuse.
- Combating misinformation and disinformation about the causes of the housing emergency.
- Build enough social homes to reduce homelessness and alleviate pressure on the system.
- Commit to delivering a minimum of 15,693 social homes each year for the next five years to reduce affordable housing need and reduce homelessness. These homes must be the right size and delivered in the right places to meet the needs of BPoC households.

The UK Government

The UK Government must:

- restore LHA rates to at least the 30th percentile from 2026/27 and increase the benefit cap accordingly in order to support BPoC renters struggling to pay exorbitant housing costs and prevent future homelessness.
- ensure that Home Office asylum processing does not create homelessness by design by extending the 28-day move-on period for those granted leave to remain leaving asylum accommodation. This should be matched with a requirement to provide housing support and advice to those leaving asylum accommodation that can effectively prevent homelessness occurring in the first place.
- review whether practices and policies generated by the Home Office are in line with public sector equality duties related to fostering good relations between groups with shared protected characteristics, taking into consideration the increased targeting of asylum accommodation and people from refugee backgrounds.

Local Authorities

While it is important to acknowledge that racism in housing operates on a systemic basis and cannot be solely blamed on specific individuals it is nonetheless the case that too many BPoC are subjected to racism by the people tasked with providing them support. It must be made clear that this is unacceptable and support and training must be made available to allow frontline staff to address biases.

Local authorities must:

- commit to eradicating racism within housing services. Review training and guidance for homelessness officers through the lens of antiracism and cultural competence to reduce structurally racist gatekeeping practices.
- update local authority Housing Emergency Action Plans, rapid rehousing transition plans and other local homeless strategies to include actions towards anti-racism and monitoring of systemic inequality and ensure wider actions are assessed from an equality standpoint to ensure that LAs do not utilise discriminatory actions to alleviate pressure on their services.
- ensure domestic abuse and gender-based violence plans take an intersectional approach to the issue of women's homelessness.

Glossary

Anti-Racism

The proactive dismantling of systemic racism and racist policies underpinning the White privileged society in which we exist. It addresses the specific harm and impact of racism on all racially marginalised communities and proposes equality of outcome, not just opportunity.

Black and People of Colour (BPoC)

Used to refer to anyone who does not identify as 'White'. In the context of this report it refers to people represented in census data and national homelessness statistics under the following categories; African, Caribbean or Black, Asian, Asian Scottish or Asian British, Arab or Arab British, Mixed or multiple ethnic groups and Other ethnic groups.

Black and Minority Ethnic (BME)

The term 'Black and Minority Ethnic (BME) groups' is used to collectively describe people from a wide range of backgrounds who face racism in Scotland. 'Black and Minority Ethnic' specifically refers to ethnic groups who experience adverse racialisation and, therefore, racism. The category is broadly synonymous with terms like 'people of colour' and 'Global Majority' but specifically speaks to people's ethnicity and how this interacts with race.

Racism

The oppression, discrimination, marginalisation, fear, hate and/or prejudice faced by racialised groups, based on a socially constructed hierarchy that privileges and prioritises White people. Racism is a marriage of racist policies and racist ideas that produces and normalises racial inequities.

Systemic Racism

Systemic racism refers to the racism that is reproduced through systems, laws, policies, and practices which result in an unequal distribution of wealth, power, and opportunities that ultimately disadvantage Black and Minority Ethnic communities. This means that racial bias has become embedded within rules, customs, processes and practices and as a consequence the design and delivery of services often fail to meet the needs of Minority Ethnic groups.

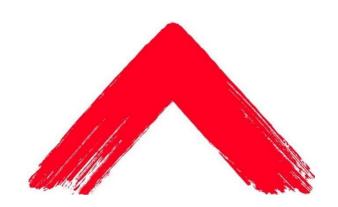
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We exist to defend the right to a safe home and fight the devastating impact the housing emergency has on people and society.

We believe that home is everything.



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