

November 2021



Edinburgh's housing emergency

A briefing paper

Summary

Edinburgh has been in the grip of a housing emergency for many years, which has been made worse by the pandemic. Too many people are trapped, many for long periods of time, in poor quality, unsuitable temporary accommodation, or forced to sleep rough because their housing rights are denied. The lack of suitable temporary accommodation, and safe and affordable permanent housing, is causing untold misery. This impacts on people's physical and mental health, with significant concern for the long-term consequences for children's wellbeing.

Shelter Scotland's Edinburgh community hub provides advice and advocacy to people experiencing homelessness and poor housing. We use these insights to inform and take action on the wider systemic changes that we believe are needed in Edinburgh. Our Time for Change project listens to and amplifies the voices of people with lived experience to identify issues, help shape services and influence change. The team has conducted a number of consultations which highlight the issues faced by people trying to access homeless services over the last 18 months. In this report the Time for Change team brings to light evidence from people who have been directly affected by these housing issues in Edinburgh, as well as workers from other organisations in the city who have shared their own experiences in supporting people.

Together with people experiencing homelessness, Shelter Scotland has long been calling for change and an effective strategic plan which will address the housing emergency in Edinburgh. However, we have not yet seen the systemic changes required to address the issues. For instance, our advisers continue to support people who have been turned away from council homelessness services and told there is no accommodation available for them. We have also worked with many people placed in temporary accommodation which is totally unsuitable for their needs, and often in breach of the council's legal obligations under the Unsuitable Accommodation Order. We cannot remain in a situation, in 2021, where people are still denied their statutory housing rights and their human right to adequate housing. The pandemic has highlighted more than ever how important home is to ensure people are kept safe.

The City of Edinburgh Council should be complying with their current legal obligations, and their services should have sufficient resource and funds in place to enable them to meet these obligations. An ambitious strategic plan urgently needs to be put in place to overcome barriers such as the lack of supply of suitable temporary and settled accommodation. This plan must be fully supported by Scottish Government to ensure the council have sufficient resource to meet demand, including the demand arising from recent amendments to the law which mean everyone is entitled to suitable temporary accommodation whilst experiencing homelessness.

This briefing outlines key recommendations, drawn from evidence gathered from our services and people living in the community who have been failed by the housing system.



Key points

- Many people in need of temporary accommodation are being turned away with no accommodation provided
- Much of the temporary accommodation on offer is unsuitable for many people presenting as homeless
- The system is too difficult to navigate, particularly for people in the midst of a crisis
- People are spending long periods in temporary accommodation, waiting for a permanent home
- The current plans will take too long to resolve the housing emergency in Edinburgh

Recommendations

These recommendations have been informed by, and developed in consultation with, people with experience of the broken housing system. The recommendations seek to address the systemic practice issues with respect to the City of Edinburgh Council's homelessness service provision.

1. The City of Edinburgh Council should urgently escalate and appropriately prioritise their activity to address the housing emergency through delivery of an ambitious but realistic, fully resourced plan which ensures that the council will:
 - meet its legal obligation to adhere to the Unsuitable Accommodation Order in both the short and longer term, and
 - provide enough affordable, secure and settled accommodation to meet its statutory obligations under the Housing (Scotland) Act 1987 and the Equality Act 2010.
2. The Scottish Government should provide appropriate support to the City of Edinburgh Council to enable them to uphold people's legal rights, particularly in light of the changes to the Unsuitable Accommodation Order.
3. The City of Edinburgh Council should undertake and make public a review of its temporary accommodation stock, showing which current stock is not suitable and why, and how they intend to provide accommodation that will meet demand. This should include how they will provide for households with particular accommodation requirements, such as people with complex support needs and individuals with restrictions on where they can be placed.



4. The City of Edinburgh Council should commit to:
 - Reviewing its protocols and procedures for the assessment and provision of temporary accommodation and clarifying what assessment of need is currently undertaken at the stage of a homeless presentation.
 - Ensuring that homeless applications are always taken and recorded at the point of someone presenting as homeless, in line with the council's statutory duty.
 - Adopting good practice and learnings from the Welcome Centre into the council's statutory service provision. This should include person-centred care, the availability of wraparound support, good communication and interagency working to ensure everyone has a dignified, safe experience when accessing emergency accommodation.
5. Suitable accommodation should be made available at point of presentation or the client should be assisted in travelling to the relevant office where accommodation will be provided. This assistance should take into account the needs of the household.
6. The council should amend its practice to ensure that people in private sector leasing schemes retain their silver status and continue to accrue one housing point per day. This should not be removed as a matter of course, and if it is removed this must be communicated in writing to the client with stated reasons.



Many people in need of temporary accommodation are being turned away with no accommodation provided.

We have been told that there is sufficient temporary accommodation for all who need it¹, but this has not been the experience of people who are homeless who we support in the city, many of whom have been repeatedly turned away. We are becoming increasingly aware of issues of gatekeeping in Edinburgh whereby people are approaching their local authority for homeless assistance and being told there is no temporary accommodation available or no suitable temporary accommodation that meets their needs.² As a result, their right to a safe home is being denied.

Official government statistics support the experiences of those we have spoken to. In 2020-21 **525 instances** in Edinburgh were recorded where households requiring temporary accommodation were not offered it – a breach of the council’s legal duty to provide temporary accommodation. Whilst this was a reduction on the year before (655 instances), the experience of people in the community suggests that people presenting for support are not always recorded by the council when they should be. This suggests that the reported figures may undercount this issue in the city. Edinburgh now accounts for **87% of all instances in Scotland** where temporary accommodation was not offered when it should have been.³

In addition to the cases described below, our Time for Change team undertook a consultation of people begging in Edinburgh between May and July 2021. It spoke with 52 people, 12 of whom said they had presented to the council for assistance and were not provided with temporary accommodation.

Recommendation

- **The City of Edinburgh Council should commit to ensuring that homeless applications are always taken and recorded at the point of someone presenting as homeless, in line with the council’s statutory duty.**

¹ Letter from Councillor Kate Campbell to Shelter Scotland, 13 May 2021

² Shelter Scotland’s definition of gatekeeping is: “The practice and systems of stopping people from accessing the homeless services which they are entitled to by law.”

³ 525 of 605 instances, figures rounded for non-disclosure purposes. Scottish Government (2021), [Homelessness in Scotland: 2020-21](#)



SHELTER SCOTLAND



Case study 1: A pregnant woman and her partner made a homeless presentation to City of Edinburgh Council, but they were told there was no suitable accommodation available. The couple slept rough that night. When they presented again the following day they were once more told nothing was available. Shelter Scotland advisers intervened and managed to get them accommodated for one night via the out of hours team at the council. Ongoing accommodation was then provided the next day.



Case study 2: In summer 2021, a woman with two children was assaulted and forced to flee from her home in a neighbouring local authority area to stay with friends in Edinburgh due to further threats of violence.

The following month, she made two attempts to present at a locality office, but local authority staff told her she needed to be referred by the local authority she fled from, despite her having no open homeless application with them and having the right to present anywhere. Temporary accommodation was not offered to her.

Following Shelter Scotland intervention, the client was provided with a hotel for one night followed by an offer of unsuitable accommodation that the client rejected. She was told she had to present again, whereby she waited outside the locality office for two hours in the rain before convincing staff to let her and others wait inside the building. She was advised to travel to a different locality office that had a shorter wait, but had neither the funds nor time to do this. Her comment to her adviser was “you know animals get treated better than this”. After Shelter Scotland intervened again, the client was once more placed in a hotel and was made to physically go to a locality office multiple days in a row for accommodation each night before finally being offered a suitable temporary flat. Once a homeless application is open, people should not be required to present daily at a locality office for temporary accommodation.



Case study 3: On a Friday in summer 2021, a couple were asked to leave their temporary accommodation and told there was nothing else available meaning they were not accommodated over the weekend, despite an ongoing duty to do so. On the Monday, the couple presented for support but were told by staff there was nothing they could do. When this was later challenged, it transpired no record had been taken of our clients' presentation. The couple were not reaccommodated until the Tuesday.



SHELTER SCOTLAND



Case study 4: In summer 2021, a client left his family home in a neighbouring local authority area due to risk of violence - he was afraid of both experiencing and perpetrating violence due to a breakdown of the relationship with his partner. He presented to his local authority and was told they had no accommodation. He came to Edinburgh and was told to return to the local authority area he came from. He stated he would sleep rough rather than returning, because of how he felt he had been mistreated there. Shelter Scotland contacted the City of Edinburgh Council to advocate for the client and that it was his express wish to present in Edinburgh, not the original local authority, and that he had a legal right to present there in addition to raising the risk of violence if he were to be sent back to the original area. The client was then accommodated.



Much of the temporary accommodation on offer is unsuitable for many people presenting as homeless.

Temporary accommodation is a crucial stepping stone for people on their journey out of homelessness. The Scottish Government and Cosla's Ending Homelessness Together Action Plan highlights that it is "an important safety net but it should be high quality, short-term and provide the right support to the people who live there."⁴

Our experience in Edinburgh is that there is a lack of suitable temporary accommodation particularly for families, people with significant support needs, people recovering from addiction and those with restrictions on where they can be placed due to bail or prison release conditions. This is partly because of Edinburgh's high reliance on B&B and hostels, and whilst suitable accommodation does look different for everyone, these B&Bs and hostels are not suitable long (or indeed short) term accommodation for the vast majority of households.

On 31 March 2021, **555 households** in Edinburgh were housed in B&Bs or hostels, equivalent to **26% of all households** in temporary accommodation at that time. The equivalent Scottish proportion of households in this type of temporary accommodation was lower, at 19%.^{5 6}

A person with lived experience told us about the impact of this unsuitable temporary accommodation:

"...so bad man, can't stop people chapping door, hostel, tiny room, 2/3 meters, bed. Bad thing about it is the noises all the time – room above, room next to you left then right. Basically not much to say better than nothing. But really happy now got a flat, can sleep and that's me, walking to the window and its quiet" Person living in temporary accommodation, March 2021

In 2020-21, the City of Edinburgh Council reported around 15 **breaches of the Unsuitable Accommodation Order (UAO)**, where a household with a pregnant woman or child was kept in

⁴ Scottish Government and COSLA (2020), [Ending Homelessness Together Updated action plan](#), October 2020

⁵ Six other local authorities have higher (East Lothian, Inverclyde and Perth & Kinross) or similar (Dundee, Glasgow, and West Lothian) proportions in hostel and B&B accommodation. Scottish Government (2021), [Homelessness in Scotland: 2020-21](#)

⁶ Note: The provision of B&B accommodation was higher this year across Scotland, related to the Covid pandemic response with additional funding provided to Edinburgh (and Glasgow) to provide temporary accommodation, with B&B used for ease of social distancing in comparison to hostels and similar.



accommodation deemed 'unsuitable' for longer than seven days.⁷ This was a marked decrease from the two preceding years, where circa 375 and 465 breaches were recorded.⁸ The council have attributed this decrease to their use of funding for Rapid Rehousing Transition Plans to purchase additional properties from their private sector leasing provider.⁹

In the same year, Shelter Scotland's Edinburgh Hub challenged at least four cases involving confirmed UAO breaches, and we believe it is likely that many more families are struggling in temporary accommodation that do not access our services. It is also important to note that our hub regularly challenges individual cases which are about to breach the UAO - and therefore we feel it is reasonable to assume that the true number of breaches would at the very least be higher without the intervention of our advisers.



Case study 5: In summer 2021, a pregnant mother presented as homeless with her two children and she was placed in a hotel. She had to share one room with her children with no means to cook meals for her family - not even a microwave. When the hotel booking came to an end after a week, there was no contact from the council about what the mother should do next. Another organisation advocated for the hotel accommodation to be extended. This happened a second time the following week, again with no communication to the client until someone advocated on her behalf. The case then came to Shelter Scotland, and the council offered to extend the hotel booking for a third time, saying no flats were available. When our adviser formally challenged the offer of the hotel under the UAO regulations, the council then offered the client a flat.



Case study 6: A family with two young children were placed in a single ensuite hotel room for three weeks in November 2020. The mother was regularly left waiting outside in the cold after her work shift, as it finished during the hotel-imposed curfew and she wasn't allowed back into the building until morning. The family were moved to more suitable temporary accommodation but only after Shelter Scotland intervened.

⁷ On 5 May 2020 the Homeless Persons (Unsuitable Accommodation) (Scotland) Order (2014) was amended so the maximum number of days that local authorities can use accommodation deemed 'unsuitable' for all homeless people is seven days. There were various temporary exceptions put in place in response to the coronavirus pandemic meaning that this order came fully into force in practice on 30 September 2021.

⁸ Note: Numbers are reported per quarter and rounded for non-disclosure reasons, therefore annual figures are estimated totals. Scottish Government (2021), [Homelessness in Scotland: 2020-21](#)

⁹ City of Edinburgh Council (2020), [Rapid rehousing transition plan: second iteration](#)





Case study 7: In September 2021 a father contacted Shelter Scotland as he had been asked to leave his temporary accommodation. He had been staying there for 1.5 years and had caring responsibilities for his child, however the accommodation was unsuitable for children to visit. After being moved out of his temporary accommodation he slept rough for one night and was then re-accommodated in further unsuitable accommodation. On contacting our helpline, the client was made aware of his rights to suitable temporary accommodation under the UAO. He said if he had known this sooner, he would have asked to be moved a long time ago and said that the council should have been aware of his caring responsibilities as he had previously asked if his child could visit overnight. Shelter Scotland advocated for him to be moved to suitable accommodation after seven days had lapsed, however they were told no accommodation was available and that he would be moved ‘as soon as possible’. The case had to be referred to Shelter Scotland’s Law Service for resolution.

The temporary Covid-related exemptions to the UAO ended on 30 September 2021, meaning that restrictions on the use of unsuitable temporary accommodation are now applicable to all households rather than only households with children or a pregnant woman. We know that the long-anticipated broadening of the UAO places pressure on local authorities and several, including Edinburgh, have highlighted that they will continue to face difficulties in abiding by their legal obligations.

“The extension of the Unsuitable Accommodation Order will result in significant challenges for Edinburgh as it is estimated that up to 25% of current temporary accommodation stock will be classed as ‘unsuitable’, including some of the additional accommodation brought on during COVID 19.”¹⁰

However, this pressure does not remove people’s right to good quality, suitable temporary accommodation. Edinburgh’s rapid rehousing transition plan outlines that it will take “at least five years” to replace this unsuitable stock, roughly 850 units, with a suitable alternative. However, this estimate is for a situation where demand for accommodation remains the same:

“...should demand increase; as a result of the fallout from COVID 19, a resurgence of COVID 19, an increase in demand when local connection is removed, or other external factors, the timescale will also increase.”

It is unacceptable that individuals will continue to have their legal rights to safe, suitable accommodation denied for a further five years, in full knowledge of the council and the

¹⁰ City of Edinburgh Council (2020), [Rapid rehousing transition plan: second iteration](#)



government. Furthermore, given the factors outlined above it seems reasonable to expect that without action this will in fact continue for much longer.

We are calling for commitment from the City of Edinburgh Council and the Scottish Government to act to urgently prioritise and ensure the provision of suitable temporary accommodation for people experiencing homelessness in Edinburgh. We anticipate high levels of breaches of the UAO in Edinburgh going forward and urge not only City of Edinburgh Council but also the Scottish Housing Regulator, and the Scottish Government, to monitor, assess and ultimately act to ensure that people's legal rights are upheld.

Recommendations

- **The City of Edinburgh Council should commit to reviewing its protocols and procedures for the assessment and provision of temporary accommodation and clarify what assessment of need is currently undertaken at the stage of a homeless presentation.**
- **The City of Edinburgh Council should urgently escalate and appropriately prioritise their activity to address the housing emergency through delivery of an ambitious but realistic, fully resourced plan which outlines how it will meet its legal obligation to adhere to the UAO in both the short and longer term.**
- **The Scottish Government should provide appropriate support to the City of Edinburgh Council to enable them to uphold people's legal rights, particularly in light of the changes to the UAO.**

One specific group who we often see experiencing difficulties are people with additional specifications on their accommodation such as those under Multi-Agency Public Protection Arrangements.¹¹ It is important that appropriate accommodation is available for such individuals for their own and the public's safety.

¹¹ In Scotland the multi-agency public protection arrangements (MAPPA) brings together the Police, Scottish Prison Service (SPS), Health and the Local Authorities, in partnership as the Responsible Authorities, to assess and manage the risk posed for certain categories of offender. The purpose of MAPPA is public protection and the reduction of serious harm. For more information, see [Scottish Government \(2018\) Multi-agency public protection arrangements \(MAPPA\) in Scotland](#)





Case study 8: In June 2021, a gentleman presented for assistance out of hours and was told he would have to present to the day service, because they were unable to carry out the necessary risk assessments, and were therefore unable to provide temporary accommodation for him. While this client had restrictions over where he could be placed and required to be risk assessed, it is imperative that the out of hours service are able to offer accommodation to all who need it to prevent rough sleeping and protect both the person who is homeless and members of the public.

The feedback from our community worker consultation supports our experiences with this group.

“Never enough accommodation. Accommodation particularly limited for those with behavioural/mental health issues or those with specific types of offending who may need male only accommodation.” Community worker, February 2021

“Regularly find that the more difficult clients are the ones turned down for temporary accommodation.” Community worker, February 2021

“The Council still at times claim no suitable accommodation for a person due to that individuals’ complex needs.” Community worker, March 2021

Recommendation

- **The City of Edinburgh Council should undertake and make public a review of its temporary accommodation stock, showing where the stock it currently has is not suitable and how they intend to provide accommodation that will meet demand. This should include how they will provide for households with particular accommodation requirements, such as complex support needs and individuals with restrictions on where they can be placed.**



The system is too difficult to navigate, particularly for people in the midst of a crisis.

Even after an application is accepted, homeless applicants in need of interim accommodation are often required to attend one or more locations in a day, and often on multiple or successive days, to make requests for accommodation. The council's Rapid Rehousing Transition Plan from 2019 details that they had work underway to "move from centralised services to locality model of working. This fits with the Council's ambition to take services to people."¹² However, our experience is that in many ways the locality model has resulted in services being even harder to access, with people wanting a central point of contact, and being confused over where they should present.

In our experience it is possible that in a single day an applicant could wait at one of the locality offices and be told there is no accommodation, be told to go to The Access Point (TAP) to get the same response, and then be told to go to Streetwork's premises and once again be told there is nothing available. Staff at each location often express confusion at why individuals have been told to travel to them. This worsens the extremely distressing and confusing situation for the person trying to present as homeless. It can also be demoralising for vulnerable homeless applicants who can be faced with multiple refusals to accommodate them. This can lead to an applicant disengaging from services with a sense of hopelessness or frustration.



Case study 9: In June 2021, our client presented at The Access Point (TAP) but wasn't provided accommodation as staff said there was none available. The client had been directed to Streetwork, who again said no accommodation was available, and our client then presented to the North East Locality Office but was once again turned away and directed back to

Streetwork. As a very vulnerable adult, this experience of being repeatedly turned away significantly impacted their mental state. The client was eventually accommodated three days later, following Shelter Scotland's intervention.

In our view, internal referrals to different locations should be minimised as much as possible. Where they are necessary, for example to enable people to access specialised support or services, it should be made as simple as possible. Individuals should be supported to access their legal rights, accounting for any particular needs of the household and barriers they might have with a requirement to travel to a different location.

¹² City of Edinburgh Council (2019), [Rapid rehousing transition plan](#)



Recommendation

- **Suitable accommodation should be made available at point of presentation or the client should be assisted in travelling to relevant office where accommodation will be provided. This assistance should take into account the needs of the household.**

More generally, people can also experience difficulties in communication with the relevant teams. This is illustrated in the June 2021 case study with the pregnant mother of two children who was placed in a hotel and received no communication on what she should do when the booking ran out. Another person who has experienced homelessness in the city gave the following response to our consultation:

“...this whole situation of coming out of hospital and finding myself going into temporary accommodation has not been a nice experience; basically Edinburgh City Council have had no communication with me. Someone like Shelter Scotland can get answers but if I was to try and phone I would just be put on an automated system, that's where it starts to affect your mental health in a bad way; I don't think the council have handled it very well.” Person living in temporary accommodation, March 2021

In response to the Covid pandemic, the City of Edinburgh Council offered additional support for people experiencing homelessness in the city through the provision of a 'Welcome Centre' at the Hub Hotel at Haymarket. In 2020-21 the Welcome Centre had 50 self-contained rooms with 24/7 support on site, as well as visiting services.

Through interagency working and good communication, people were often moved on to temporary accommodation within 2-4 days. This resource massively reduced the incidence of rough sleeping in Edinburgh over winter 2020; the centre was closed in May 2021 but recently reopened. Our Time for Change team undertook a community consultation on the Welcome Centre and the feedback was overwhelmingly positive - with people talking about feeling valued, describing it as like 'paradise' and providing positive comments on the support available.

“Positive, they always done room check ask if okay, staff friendly, professional, always food you know and aye no complaints, all positive yeah yeah. To me anyway! No complaints and happy so yeah all positive definitely.” Person who stayed at the Welcome Centre, April 2021



SHELTER SCOTLAND

"I have spoken to other residents and they have told me that this place is beautiful compared to other [accommodation] they have accessed. They've never seen such an amazing place. Staff are approachable, friendly, well-mannered – and they come to see you every day to see how they can help. The food is good – evening meal, and even a packed lunch [is] provided –and the place is clean and tidy.

I am afraid that if I stop being resident there, I will lose the support of the staff, and might not get that quality of support anywhere else. There should be ongoing support after you leave a place – for example if you left hospital, and you still had an issue you needed support with, ongoing support would be put in place.

People are valued there, regardless of age or gender or race or situation. I haven't seen any fights or arguments, it feels secure – like a real hotel. When you enter you are asked what your room number is – no one can just walk in.

I didn't feel homeless! Comfortable, internet access." Person who stayed at the Welcome Centre, April 2021

"So I went to Welcome Centre. Here I got emergency accommodation with condition that I will go to Council every day to ask for temporary accommodation. That place is like Paradise for homeless people. I felt there safe and peaceful even if I knew that was only illusion because I could stay there for a while, until I found temporary accommodation. When you hear that is emergency accommodation for homeless people, you expect that it should be some terrible and unsafe place. Honestly, I didn't expect service like that – more like for guests in a few star hotel. Cleanliness – excellent (as a former housekeeping supervisor I see it even without checking:)) Breakfast and lunch bags. Fruits, hot drinks/juice were available almost whole day. Next surprise was dinner – like in restaurant, options for meat eaters and vegetarians, some days even more than one main dish, plus dessert. And the food was delicious and served with love. Staff of Welcome centre was amazing, obvious that it is not just a job for those people, it is a mission." Person who stayed at the Welcome Centre, April 2021

"[The Welcome Centre hub] was brilliant, nicest people, went beyond call of duty to help. Lack of housing but hub especially was very helpful!" Person who stayed at the Welcome Centre, March 2021



There is a real opportunity to learn from the positive experiences that people had during winter 2020¹³ and retain the benefits of the system particularly with the roll out of a rapid access model:

- A person-centred, holistic approach that considered a person's health, wellbeing and needs with many services available from the Welcome Centre itself, or direct referrals were made.
- A joined up street services approach with all street services in Edinburgh including Bethany Christian Trust, Crisis, Cyrenians and Streetwork signposting anyone who was found rough sleeping to the Welcome Centre where accommodation was provided immediately, in contrast to sometimes siloed working without a central point that ensures the safety of those rough sleeping.
- An inter-agency approach with an online multi-agency fortnightly meeting including local authority, third sector and support organisations working across Edinburgh. Through the centre, services became more joined up, which aided information sharing and joint working to best meet each individual's needs.

The wraparound support on site not only seemed to increase satisfaction and remove barriers to accessing support, but we found that it also meant people were able to be more quickly supported through the homeless system into suitable longer term temporary accommodation as contact was maintained, the household's needs were assessed, and people received any support required.

Recommendation

- **Good practice and learnings from the Welcome Centre, including person-centred care, the availability of wraparound support, good communication and interagency working should be adopted into the council's statutory service provision to ensure everyone has a dignified, safe experience when accessing emergency accommodation.**

¹³ The Welcome Centre [reopened in October 2021](#) and is commissioned to run until March 2022.



People are spending long periods in temporary accommodation, waiting for a permanent home.

The average time a household spent in temporary accommodation in Edinburgh in 2020-21 was **318 days, up from 292 days the year before**. Whilst the increase could be seen in the context of Covid with many local authorities experiencing an increase in temporary accommodation stays in the last year, attributed to difficulties in moving people on in the pandemic, the average stay is roughly 4 months longer than the Scottish average of 199 days.¹⁴

For households with children this time was significantly more again: as the table shows, in 2019-20 single parents spent on average 329 days in temporary accommodation. This has now risen to **458 days** for single parent households leaving temporary accommodation in the last year.¹⁵ This places even more importance on ensuring that temporary accommodation meets the needs of the household.

Table: Average time in temporary accommodation for households with children in Edinburgh, for all cases closed in the reporting year		
	2019-20	2020-21
Single parent	329	458
Couple with children	379	541
Other family type with children	415	519

Whilst much of the long periods in temporary accommodation are caused by a shortage of permanent accommodation, we are also aware of an issue through our casework in Edinburgh for people in private sector leased flats. People with higher levels of need are often assigned 'silver status' to ensure they are prioritised for accommodation they bid on. We have seen people placed in private sector leased temporary flats who then lose their silver status and stop accruing homelessness points, which should be accrued at the rate of one point per day, with

¹⁴ Scottish Government (2021), [Homelessness in Scotland: 2020-21](#), Table 36.

¹⁵ What's more, these figures only calculate the time periods for households who have left temporary accommodation in the reporting year, which gives cause for concern when we know many people have been stuck in temporary accommodation for years.



each point giving the household greater priority for permanent accommodation. We have found that the removal of silver status and households not accruing further points is often not communicated to clients, leaving them unsuccessfully bidding for a home sometimes for years in the belief that they are moving up the waiting list, when in fact their priority has not changed since the day they entered private sector leased temporary accommodation. This issue should be addressed immediately.

Recommendation

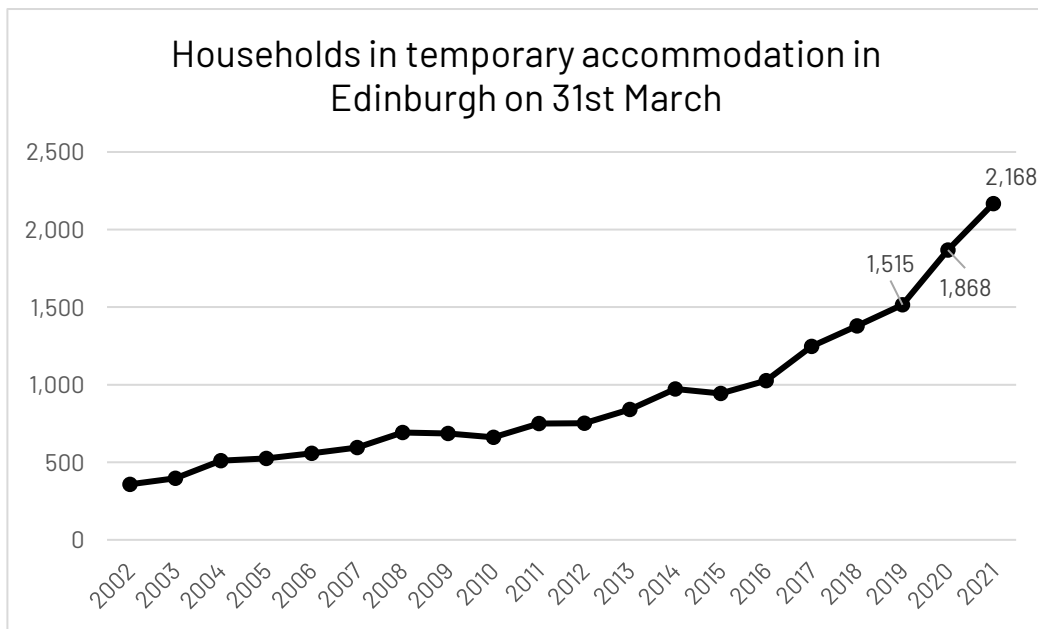
- **The council should amend its practice to ensure that people in private sector leasing schemes retain their silver status and continue to accrue one housing point per day. This should not be removed as a matter of course, and if it is removed this must be communicated in writing to the client with stated reasons.**



The current plans will take too long to resolve the housing emergency in Edinburgh.

There is no doubt that Edinburgh faces significant pressures on its housing system.

On 31 March 2021, there were **2,168 households** in temporary accommodation, including 1,625 children;¹⁶ a **16% increase** in households on the previous year (1,868). This figure has been steadily rising.¹⁷



At the end of March 2021, there were **5,446 open homeless applications**. This compares with 303 homeless applications taken between January and March 2021, or 2,171 in the year, highlighting the massive bottleneck in the system and huge pressures being put on the homelessness service.¹⁸

¹⁶ NB: this figure is substantially lower than the figure provided in the latest RRTP update, which states that there were 2,717 households in temporary accommodation (excluding private sector leased accommodation) on 31 March 2021. Source: City of Edinburgh Council (June 2021), [RRTP annual update](#)

¹⁷ Scottish Government (2021), [Homelessness in Scotland: 2020-21](#)

¹⁸ Scottish Government (2021), [Homelessness in Scotland: 2020-21](#)



The council have summarised many of their unique challenges, with 21,000 applicants registered as seeking social housing in Edinburgh, and between 150 and 200 bids made on each socially rented home.¹⁹ For the most in-demand properties, there can be over 600 applicants for each vacancy.²⁰ In 2019-20, over 3,400 households were assessed as homeless with only 2,300 social lets made, again highlighting the imbalance between supply and demand:

“Even if all lets in the social sector went to homeless households, it would not be enough to meet demand and would not allow for any other groups to be housed.”²¹

The council’s first version of their rapid rehousing transition plan, which sets out how they will support people who are in housing need, highlights the scale of the issue and that there will be insurmountable demand on their supply of temporary accommodation for some years to come:

“Given the context and pressures of the Edinburgh housing market, it will not be possible to achieve the Scottish Government’s ambitions in full within 5 years. The priority for Edinburgh will be to eliminate the use of unsuitable accommodation in the short term, within five years, using bed and breakfast accommodation for very short periods (less than seven days) and increasing alternative temporary accommodation including mainstream properties, supported accommodation and other community-based alternatives.”²²

The council have provided several statistical returns highlighting their difficulty in meeting their statutory obligations. We have also raised concerns about housing issues we have seen at Shelter Scotland – through our advice services and our Time for Change community consultations – in various correspondence with operational managers and senior leaders within the council over and prior to the past 18 months. We also understand that the Council have recently raised their concerns on how they will meet new legal requirements from changes made to the UA0 with the Scottish Government. There is also a taskforce run by the council with various stakeholders including Shelter Scotland on the issue of homelessness in the city. However, ongoing dialogue and reporting has not yet transformed the experiences of many people who need a settled, safe and secure home, now.

An ambitious but realistic, fully resourced plan is required which ensures that the council will overcome its challenges and meet its statutory duties. A full and comprehensive assessment should be made on whether the council are adequately prioritising not only their legal

¹⁹ City of Edinburgh Council (2019), [Rapid rehousing transition plan](#)

²⁰ <https://edindexhousing.co.uk/supply-demand/>

²¹ City of Edinburgh Council (2020), [Rapid rehousing transition plan: second iteration](#)

²² City of Edinburgh Council (2019), [Rapid rehousing transition plan](#)



obligations, but more generally the needs of people experiencing homelessness in the city. However, crucially, the Scottish Government should also be considering its role in supporting the local authority to adhere to the changing legislative requirements placed on them, including providing financial support given the unique challenges faced in Edinburgh.

Recommendation

- **The City of Edinburgh Council should urgently escalate and appropriately prioritise their activity to address the housing emergency through delivery of an ambitious but realistic, fully resourced plan which ensures that the council will:**
 - **meet its legal obligation to adhere to the UAO in both the short and longer term**
 - **provide enough affordable, secure and settled accommodation to meet its statutory obligations under the Housing (Scotland) Act 1987 and the Equality Act 2010.**

Contact:

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