

## Shelter Scotland written evidence on homelessness for the Local Government and Communities committee

1 March 2017

Shelter Scotland would like to thank the Local Government and Communities committee for inviting us to give evidence on homelessness in Scotland.

Shelter Scotland helps over half a million people every year struggling with bad housing or homelessness through our advice, support and legal services. And we campaign to make sure that, one day, no one will have to turn to us for help.

Shelter Scotland launched a campaign on homelessness in September 2016 called [Homelessness: Far From Fixed](#)<sup>1</sup>, as we believe there is an urgent need for the Scottish Government to re-focus on homelessness. We therefore welcome this inquiry from the committee. Our campaign policy report which outlines our key policy asks in more detail can be found [here](#)<sup>2</sup>. You can also find up-to-date statistics on homelessness in Scotland on our website [here](#)<sup>3</sup>.

Scotland has a strong track record in tackling and preventing homelessness, but in spite of this progress, homelessness in Scotland is far from fixed.

There are complex challenges which must be addressed urgently, and require a coordinated approach. There is for example concern regarding:

- The impact of the welfare reforms on individuals, local authorities and social landlords
- The increase in social sector evictions as a response to managing rent arrears
- The pressure on local authority budgets and the potential risk to funding for homelessness services
- The pressure on the provision of and funding for temporary accommodation
- The length of time spent in temporary accommodation
- The quality and affordability of temporary accommodation
- The ability to move households on to appropriate settled accommodation
- The lack of consistent Scotland wide housing support services for offenders to help prevent re-offending
- The disproportionately slow reduction in the number of young people becoming homeless
- The increasing proportion of people with complex needs and the need to make appropriate services available for this group.

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<sup>1</sup> [http://scotland.shelter.org.uk/get\\_involved/campaigning/homelessness\\_far\\_from\\_fixed](http://scotland.shelter.org.uk/get_involved/campaigning/homelessness_far_from_fixed)

<sup>2</sup> Policy paper [http://scotland.shelter.org.uk/\\_data/assets/pdf\\_file/0007/1278178/FarFromFixedPolicyPaperFINAL.pdf](http://scotland.shelter.org.uk/_data/assets/pdf_file/0007/1278178/FarFromFixedPolicyPaperFINAL.pdf)

<sup>3</sup> **Homelessness statistics** [http://scotland.shelter.org.uk/housing\\_policy/key\\_statistics/homelessness\\_facts\\_and\\_research](http://scotland.shelter.org.uk/housing_policy/key_statistics/homelessness_facts_and_research)

Shelter Scotland believes that in order to address these complex and interlinked issues the Scottish Government must commit to developing a new **National Homelessness Strategy**. This strategy should deliver a cross-departmental action plan, which would become the cornerstone of successfully preventing and responding to homelessness in Scotland in all of its forms.

Shelter Scotland has published the following reports which provide evidence for why we believe this approach is necessary.

- [Complex needs: Homelessness services in the Housing Options East Hub](#) Shelter Scotland (2016)
- [The use of temporary accommodation in Scotland](#) Shelter Scotland (2017)
- [Funding Homelessness Services in Scotland](#) Commissioned by Shelter Scotland - Anna Evans Housing Consultancy (2016)
- [Preventing Homelessness and Reducing Reoffending](#) Shelter Scotland (2015)
- [Consultation response on Social Security in Scotland](#) Shelter Scotland (2017)

We have also consulted with a wide range of organisations throughout Scotland who have voiced similar concerns to ours. We now have 56 MSPs signed up to the campaign, with 4 of the political parties officially signed up too. 23 organisations have also signed up and support our call for a new National Homelessness Strategy. You can see who has signed up to our campaign [here](#).

We believe a well-planned, cross-departmental homelessness action plan will also contribute to national and local outcomes around tackling inequalities, reducing re-offending, improving health, building strong communities and improving the quality of public services.

We want clear leadership and accountability to be attached to the new Homelessness Strategy, and for the action plan to be considered a priority for the Scottish Government, especially considering the high cost of homelessness<sup>4</sup> against continuing cuts to public funding.

We have not developed a detailed blueprint for a new strategy as we argue that it should be co-produced with a range of stakeholders and partners, including people who have experienced, or are experiencing, homelessness.

We have however set out areas we think a new National Homelessness Strategy should give priority to:

## Prevention

Homelessness prevention activity has undoubtedly increased in Scotland as a result of the Housing Options approach. This is apparent in the downward trend in homeless applications despite the number of people approaching local authorities with reasons related to a risk of homelessness seemingly remaining relatively constant.<sup>5</sup> Over 56% of all the approaches for assistance did not go on to make a homeless application between April and September 2016, according to the most recent statistics<sup>6</sup>.

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<sup>4</sup> Nicholas Pleace (2015); [At What Cost? An estimation of the financial costs of single homelessness in the UK](#); Crisis

<sup>5</sup> Shelter Scotland (2015) [‘Statistical Analysis Report: Homelessness and prevention through Housing Options in 2015 - what does the data show?’](#) Edinburgh: Shelter Scotland

<sup>6</sup> Scottish Government (2016) [Housing Options \(PREVENT1\) Statistics in Scotland: Update to September 2016](#)

This trend is showing signs of levelling off, however, and the drive to improve prevention measures should never lie stagnant. There are specific areas of concern to which further attention must be given such as the increase in social sector evictions, tackling homelessness for those leaving prison<sup>7</sup> and the disproportionately slow reduction in the number of young people becoming homeless.<sup>8</sup> Recent research compares the 'light touch' approach to Housing Options in Scotland with the 'activist' prevention approach in England.<sup>9</sup>

In the context of budgetary pressures there is a real risk that investment in important preventative work will be reduced at a local level.<sup>10</sup> Aside from the personal distress that an episode of homelessness will cause, not preventing homelessness where it might have been possible to do so can ultimately be costly for the public purse. A new National Homelessness Strategy could safeguard against that risk and ensure that prevention measures in Scotland continue to improve.

The publication of the 'Prevent1' statistics for the past two years has given a helpful insight into the level of prevention work that does go on across Scotland. Predominately the Prevent1 statistical analysis has shown that there is wide variation in the help that is offered to households at risk of homelessness in Scotland.<sup>11</sup> This is one reason why consideration of a prevention duty, similar to the Welsh model, may be helpful for Scotland. For 45% of Housing Options approaches from January to March 2016 the outcome recorded was that the household made a homelessness application. However, Shelter Scotland argue making a homeless application is not an outcome, but a step along the way to an outcome. In order to understand what is happening to homeless households it would be more helpful to know what eventually happens when people have gone through the Housing Options route as opposed to making a homelessness application.

**Shelter Scotland recommends that continued prioritisation of homelessness prevention should be supported by ongoing analysis and strategic oversight of statistics to increase understanding of effective prevention interventions.**

**We would also like the existing Prevention guidance to be reviewed and updated accordingly and an investigation into the potential merits of introducing a statutory prevention duty similar to the Welsh duty now in place. Local authorities should also be encouraged, facilitated and collaborated with to develop and share effective Prevention solutions.**

## **Housing Options**

In 2014 the Scottish Housing Regulator (SHR) published a thematic enquiry into the delivery of Housing Options. The SHR voiced concerns that, at that time, rather than being a model of positive prevention practice, in some places Housing Options was being used to prevent households accessing their statutory right to homelessness assistance<sup>12</sup>. In most cases, this issue of preventing access to homelessness assistance or 'gatekeeping' is prompted by a lack of availability of temporary accommodation. Shelter Scotland frontline advisers continue to receive reports that this is still happening in some areas in Scotland. When challenged with a threat of judicial review on individual cases by organisations such as Shelter Scotland, local

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<sup>7</sup> Shelter Scotland (2015) [Preventing Homelessness and Reducing Reoffending](#)

<sup>8</sup> Fitzpatrick, S. et al, (2015) 'The homelessness monitor: Scotland 2015' London: Crisis

<sup>9</sup> Fitzpatrick, S. et al, (2015) 'The homelessness monitor: Scotland 2015' London: Crisis

<sup>10</sup> Evans, A. (2016) 'Funding Homelessness Services in Scotland' Edinburgh: Shelter Scotland

<sup>11</sup> Scottish Government (2016) [Housing Options \(PREVENT1\) Statistics in Scotland: 1 April 2014 to 31 March 2016](#) Edinburgh Official Statistics

<sup>12</sup> Scottish Housing Regulator (2014) [Housing Options in Scotland: A thematic enquiry](#)

authorities tend to respond promptly and positively negating the need to continue to challenge in Court. As a result, there have not been any cases brought to successful judicial review to publicly highlight poor practice in this area.

Housing Options is not a comprehensive homelessness strategy – it does not respond adequately to the needs of all homeless people or every aspect of homelessness. In particular, it has been recognised that people with complex needs including rough sleepers can fall outside the scope of those helped by this approach and the focus on Housing Options has led to a lack of response to this highly vulnerable group.<sup>13</sup> Other pressing issues for the homelessness sector, such as the changes in funding to temporary accommodation are also not addressed by a focus on delivering Housing Options.

**Shelter Scotland recommends that in recognition of concerns in this area, a National Homelessness Strategy should commit to the elimination of gatekeeping practices and tackling the systemic challenges ongoing in certain local authorities in meeting their homelessness commitments. We must ensure that people are being given appropriate Housing Options advice, that they are aware of their housing rights and are not being wrongly deterred from making a homeless application.**

### **Temporary Accommodation**

Temporary accommodation is a lifeline for vulnerable households and a cornerstone of the response to homelessness in Scotland. We need to ensure that it is good quality and most of all, affordable, especially for working households, and that there is a clear plan for moving on from temporary accommodation for every household.

According to the most recent Scottish Government statistics<sup>14</sup>, across Scotland, there are over 10,500 households living in temporary accommodation, including over 5,700 children. Currently too many households are spending far too long in temporary accommodation.

Despite the downward trend in homeless applications and acceptances in recent years, the number of households in temporary accommodation across Scotland has remained relatively stable. In many areas, it is getting harder to move people on from temporary accommodation and therefore households are spending longer without settled accommodation. This includes increasing numbers of children in temporary accommodation. There were 5,751 children living in temporary accommodation on 30 September 2016, an increase of 826 on the previous year. Children living in TA is of particular concern as time without a settled address can be harmful for development.<sup>15</sup>

Research by Shelter Scotland into the use of temporary accommodation<sup>16</sup> also found that in 2015-16, households who used temporary accommodation stayed there for an average of 24 weeks, and that on average, households with families spent more time in temporary accommodation than households without children. Overall, households with children spent around 1 million days in local authority-provided temporary accommodation in 2015-16.

**Shelter Scotland recommends that based on new information available through the collection of HL3 stats, the problem of length of stay in temporary accommodation is**

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<sup>13</sup> Shelter Scotland (2016) [Complex needs: Homelessness services in the Housing Options East Hub](#)

<sup>14</sup> Scottish Government (2016) [Homelessness in Scotland: Update to 30 September 2016](#)

<sup>15</sup> Hogg, S. et al, (2015) [An Unstable Start](#) NSPCC

<sup>16</sup> Shelter Scotland (2016) [The use of temporary accommodation in Scotland 2016](#)

**analysed and a strategic approach is taken to reducing the length of time in temporary accommodation (where appropriate for households).**

The Scottish Government has encouraged local authorities to reduce the use of Bed and Breakfast (B&B) accommodation. In recognition of the problems associated with the use of B&B, the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014 limits the use of this type of accommodation for pregnant women or families with children to 14 days, unless under exceptional circumstances. The order also sets certain standards that accommodation for this group must meet. However, due to the lack of security and often low standards, B&B accommodation should not only be considered unsuitable for pregnant women and children but also highly vulnerable people, including single person households.

**Shelter Scotland recommends that a National Homelessness Strategy should set targets and approaches to the reduction of B&B use for all local authorities, particularly for vulnerable households.**

The limited availability of social housing lets is one of the main reason for the rise in the use of temporary accommodation, and therefore continued close strategic links between the [Joint Housing Policy and Delivery Group](#) and a new National Homelessness Strategy will be important. The Scottish Government's commitment to building 50,000 new affordable homes over the lifetime of this Parliament, with 35,000 for social let, is particularly welcome to address the use of temporary accommodation.<sup>17</sup>

**Shelter Scotland recommends that the development of new social housing must meet the needs of homeless households in local authority areas and must therefore be linked to a national homelessness strategy.**

### **Funding Temporary Accommodation**

Several changes to the way that temporary accommodation is subsidised and paid for since 2010 pose a significant threat to local authorities' ability to fund temporary accommodation without making large demands on other areas of council funding. In practice, this has resulted in authorities taking steps such as redesigning their temporary accommodation portfolios and re-evaluating rent charges.<sup>18</sup> Despite the positive actions this has achieved, the further tightening of funds to a resource that is already under pressure in many areas is of serious concern. There is an estimated significant shortfall in projected funding for temporary accommodation in Scotland. This is estimated as being anywhere between £20m to £60m<sup>19</sup> annually.

Some local authorities predict that the quality of the temporary accommodation they provide will reduce and it is likely that the support available to people in temporary accommodation will also be cut back. This is of particular concern because Scotland does not currently have the safeguard of guidance on minimum standards in temporary accommodation for all.<sup>20</sup>

**Shelter Scotland recommends that as part of a new National Homelessness Strategy there must be a review of the funding of temporary accommodation in Scotland**

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<sup>17</sup> Based on research published by Shelter Scotland, CIH Scotland and SFHA, Scotland must build 60,000 new homes each year to meet identified need for affordable housing. Shelter Scotland welcomes the Scottish Government commitment to build 50,000 new homes a year, but note that this falls short of what is required to meet need and demand. Powell, R, Dunning, R, Ferrari, E, McKee, K (2015) [Affordable Housing Need in Scotland](#)

<sup>18</sup> Evans, A. (2016) ['Funding Homelessness Services in Scotland'](#) Edinburgh: Shelter Scotland

<sup>19</sup> Tony Cain, Policy Manager ALACHO

<sup>20</sup> Shelter Scotland & CIH (2011) [Temporary Accommodation Guidance](#)

leading to a new model that is not solely reliant on the levels of housing benefit or Universal Credit housing element available via the Department of Work and Pensions.

### **Rough Sleeping and Multiple and Complex Needs**

We would like the Scottish Government to pay particular attention to the rising number of homeless applicants who have multiple and complex needs and who make up the majority of rough sleepers in Scotland. Analysis of the most recent national homelessness statistics tells us that, while homeless applications are reducing, there is a growing number of individuals with complex support needs.<sup>21</sup>

In 1999 the Scottish Government set a target of ensuring that by 2003 no one should have to sleep rough in Scotland. This led to a programme of activity under the title “Rough Sleepers Initiative”.<sup>22</sup> Now, 13 years on from the ending of this initiative, there are strong anecdotal reports of an increase in rough sleeping from (at least) Edinburgh and Glasgow’s winter night shelters. There is also increasing recognition of, and concern for, the most vulnerable homeless people who have multiple and complex needs. There is a large overlap between this group and those that sleep rough.

It has been shown that general homelessness services are often not designed to meet the needs of this group<sup>23</sup> and the Scottish Government has acknowledged that there is a need for outcomes for this group to be improved.<sup>24</sup> Indeed, there are many factors that have aligned to make the current context fertile for positive change such as the Integration of Health and Social Care, work following the publication of ‘Restoring of Homelessness as a Public Health issue’<sup>25</sup>, increased understanding of Adverse Childhood Experience and the gradual increase of Housing First projects across Scotland.

The lack of proactive and innovative thinking around how best to prevent or end homelessness for these individuals has led to high costs to the public as local authorities struggle to find cost effective, sustainable solutions with very little guidance and sharing of best practice.

The general homelessness services that are currently available cannot ably meet the needs of these clients in an effective way and this must be addressed. Local authorities must be facilitated and encouraged to be innovative, to work jointly with appropriate partner services and to share best practice locally and nationally.

**Shelter Scotland recommends that the need to improve services and outcomes for homeless people with complex needs across Scotland should be a focus for the new National Homelessness Strategy. As part of a strategy, the Scottish Government should recommit to the target of reducing rough sleeping and commit to concrete actions based on the ‘key factors for change’ identified in Shelter Scotland’s recent research on the services for people with multiple and complex needs.**

For further information, please contact Debbie\_King@shelter.org.uk

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<sup>21</sup> Scottish Government (2016) [Homelessness in Scotland: 2015/16](#)

<sup>22</sup> Scottish Government (2005) Final Evaluation of the Rough Sleepers Initiative [Chapter 3: The implementation and effectiveness of the RSI from the perspective of local authorities and national level agencies](#)

<sup>23</sup> Shelter Scotland (2016) [Complex Needs: Homelessness Services in the Housing Options East Hub](#)

<sup>24</sup> Scottish Government paper to HPSG (21 May 2015) [‘Homelessness in Scotland: Rough sleeping, multiple exclusion and complex needs’](#)

<sup>25</sup> Hetherington, K. and Hamlet, N. (2015) [‘Restoring the Public Health response to Homelessness in Scotland’](#) Scottish Public Health Network