

Shelter Scotland Comments on the proposed interim Code of Guidance

Shelter Scotland welcomes the opportunity to feedback on this proposed insertion to the interim Code of Guidance. We strongly support the need for updating the Code of Guidance, and believe that the CIH Scotland/Shelter Scotland standards provide a good basis for the new standards. However, there are certain parts of the proposed Annex that we would advise strengthening and clarifying.

Physical

The proposed Annex details that temporary accommodation should:

- **Provides units that are secure with individual locks so people feel that their belongings are safe;**
- **Provides a facility to secure personal mail;**
- **Have access to on site laundry facilities;**

Shelter Scotland welcomes these additions, but would like to see guidance relating to any charges associated with these services. Hidden charges, such as those associated with laundry or storage facilities, can render such services inaccessible for homeless households that are already in financial crisis.

- **Have access to adequate cooking facilities;**

We feel this particular point could be strengthened, for the avoidance of doubt as to what constitutes “adequate cooking facilities”. Many households in our services have experienced trying to ‘cook’ in temporary accommodation with only a microwave or kettle: this kind of situation must not be allowed to continue.

- **Have provision to allow visitors.**

We particularly welcome this point, as we find restrictive rules around visitors are a regular issue for our clients. Given the extended length of time people often spend in temporary accommodation, no capacity for receiving visits from family and friends can increase isolation and the trauma of a stay in temporary accommodation. On a more specific point, single men who do not have custody of their children can be particularly affected by such restrictive rules around visits, and this can damage their relationships with their children. We would therefore like this point to explicitly include “adequate provision for visits from children”.

Location

- **An assessment of personal safety of the household, specifically households fleeing domestic abuse, predominately women, and whether the temporary accommodation being offered is in an area that is close to the perpetrators family and/or is too far from children’s school, social network etc.**

Shelter Scotland welcomes the above considerations, but would like to see guidance that ensures the household is included in such discussions. Many households in our services describe feeling a lack of control with regards to their

temporary accommodation placements, which can have considerable impact on their mental health.

“You have no say over it, no control at all. I was just put here and told to shush... Not in control at all. It’s as if you’re just like this person, this figure, and they’re just puppeting you about the place.” (K, a mum in our South Lanarkshire Service, describes her experience of temporary accommodation.)¹

Service

The guidance repeatedly advises “access to” various services:

- **Access to different types of accommodation especially where households are fleeing domestic abuse and the accommodation is used by mixed sex and/or only has male or female staff;**
- **Access to flexible and ongoing needs led support, specifically where households have multiple and complex needs;**
- **Access to comprehensive information of the appropriate services including counselling, addictions, mental health, medical, dental, optical and money/welfare advice to signpost the household to relevant and available support;**

Shelter Scotland recommends the guidance not just advise “access to” services, but that *support to access* such services.

Similarly, while information should definitely be provided about appropriate services, that information should be suitable and easy to access, rather than necessarily “comprehensive”.

- **Psychologically Informed Environments, where appropriate, and if required, ensuring staff have been trained in trauma informed care to ensure person-centred needs are met;**

Staff should indeed be trained in trauma informed care where necessary. However, the current proposal relies on households disclosing trauma: a move should be made towards temporary accommodation and housing services where all staff are trained in trauma informed care.

- **Regular and sustained home visits by allocated officers to identify any unmet needs of the household; and**

These home visits should be based on an individual support plan, which the household is integrally involved in creating. Allocated officers should, where possible, remain the same individuals for a household.

- **Ongoing communication with the household with easy access to Housing Officers to discuss issues, ensuring that any information provided is available in different formats and an interpreter is provided where necessary.**

¹ Shelter Scotland (2019). [Housing, Choice and Control: how housing and poverty interact](#)

Shelter Scotland recommends that an interpreter should be offered whenever a household's first language is not English, rather than leaving the provision of an interpreter down to a discretionary decision as to what is "necessary".

Management

The guidance repeatedly refers to households being "provided with" services:

- **Information on any House rules has been provided, including an appropriate set of procedures to demonstrate that anti-social behaviour will not be tolerated especially in shared accommodation such as B&B's;**
- **Information on the Repairs procedure has been provided;**
- **The household is provided with or can access all relevant information applicable to the household's requirements whilst in temporary accommodation and this information is available in different formats;**
- **Information on the Notice period to end an occupancy agreement, including the right to appeal is provided;**
- **That households are made aware of the Local Authority's Complaints procedure and how to access it;**
- **That households are provided with a rent statement of charges and how they are paid, in light of the introduction of Universal Credit**

Shelter Scotland recommends that households are not just provided with such information, but that it is always provided in the appropriate format, and that households are supported to understand such relevant information.

- **Procedures are in place to ensure there is minimum disruption to the household when moving in and out of the accommodation;**

Households should be made aware of any support – financial or otherwise – that is available to facilitate moving in or out of the accommodation.

- **Procedures are in place to protect personal possessions and provide storage where necessary;**

These storage facilities should be affordable for the household, preferably free of charge. The majority of households using this service will be unable to afford additional charges, so Shelter Scotland would advocate there being no associated cost. If costs are necessary, households should be able to get support to pay this through the Scottish Welfare Fund.

Distribution and availability of these standards

We are heartened to see advice that the advisory standards in this annex should be published in leaflet format and available in housing and homelessness offices, and in any information pack that the households receives upon entry to temporary accommodation. Shelter Scotland would like to additionally propose that the leaflet be available in any common areas of temporary accommodation (e.g. laundry facilities), and available upon request from housing officers and other services staff that households come into contact with.

Final points

While we welcome this much-needed updating of the Code of Guidance, Shelter Scotland believes that emphasis should equally be on effective implementation. We also note that the proposed Annex provides no indication of how long these standards will remain “advisory”: Shelter Scotland has long campaigned for legally enforceable standards of temporary accommodation, and recommend that the above standards are only merely “advisory” for a prescribed and brief amount of time, e.g. no more than a year.

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