UN Sustainable Development Goal Delivery in Scotland: Call for Evidence

This report contains Shelter Scotland's response to the call for evidence on the UN Sustainable Development Goal Delivery in Scotland. For brevity it only includes the goals and questions to which we answered.

We provided responses to section 3, how Scotland is doing in relation to each Sustainable Development Goal, and specifically:

- Goal 1: No Poverty
- Goal 3: No Health and Wellbeing
- Goal 7: Affordable and Clean Energy
- Goal 11: Sustainable Cities and Communities

Description of survey taken from call for evidence:

What this survey is

This survey is one of a number of ways in which we are engaging with people across Scotland on Scotland's National Outcomes, the UN Sustainable Development Goals (SDGs) and how best to approach achieving them.

Your views will inform development of our overall approach to implementing the National Outcomes and SDGs in Scotland as well as how we will report on this within the UK Government Voluntary National Review (VNR).

You can read more about the SDGs and VNR on the SDG Network Scotland website.

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3. How is Scotland doing in relation to each SDG?

GOAL 1: No Poverty

We would encourage you to **consider your response in light of the SDG targets** for this indicator - see End poverty in all its forms everywhere - and also the **initial assessment of Scotland's performance in the discussion paper published alongside this call for evidence.**

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

The right to an adequate standard of living, including housing, is a human right and is undeniably linked to poverty. Progression towards the goal of ending poverty in all its forms anywhere will be beneficial in tackling homelessness. Equally, the fulfilment of the right to a safe, secure and affordable home is essential in eradicating poverty in Scotland.

Unaffordable housing costs pushes people into poverty
Poverty rates in Scotland are continuing to rise, and housing costs are pushing people into poverty.

Figures published in March 2019 show that 900,000 people live in relative poverty in Scotland.[1] After housing costs, this figure rises to 1.03 million people, equivalent to one in five people in Scotland. This is an increase since 2014-17 when 19% of Scotland's population or 1 million people a year were living in poverty.

An adequate home is a human right: we don't believe anyone should have to live in poverty to access their human rights.

Poverty is linked to housing insecurity
With regard to ensuring equal rights to economic resources (Goal 1.4), we know that many people in poverty have restricted access to high quality, secure housing: in Shelter Scotland's experience, someone struggling with in-work poverty is more likely to accumulate rent arrears and risk eviction and subsequent homelessness through no fault of their own. The person may then be faced with the high cost of temporary accommodation, which can push them more into debt. However, this fate is avoidable if the social security system is set up to properly support those out of work and on low and uncertain wages. Universal Credit (UC) is intended to support people back into work, but our client experiences indicate that there is much to improve before it can be regarded as doing so. In particular:

- The impact of the waiting period of five weeks which means that many people are being pushed into hardship while waiting for their first payment.
- The housing element being wrongly missed out or the wrong amount awarded when the first Universal Credit payment is made.
- The difficulty of setting up Alternative Payment Arrangements for those who

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[1] Scottish Government (2019), Poverty and income inequality in Scotland: 2015-18, https://www.gov.scot/publications/poverty-income-inequality-scotland-2015-18/

struggle to manage money and the different Alternative Payment
Arrangements payment schedule.
- The advance payment repayment rate being too high, especially for those with
  other debts.

Alongside many other organisations in the sector, Shelter Scotland has repeatedly
called for a halt to the roll-out of UC, so that the many problems with its
administration and delivery can be fixed.

Poverty is a key determinant of homelessness, and homelessness is not reducing

Poverty is a significant predictor of homelessness, and homeless statistics can
provide an indication of success in meeting Goal 1.4 regarding equal rights and
access to economic resources and basic services. In 2017-18, 34,972 households
applied as homeless in Scotland.[2] This is a 1% rise on 2016-17; the first increase
since 2008-09. This small increase follows a levelling off of the rate of applications
over the past few years, and shows that the impact of Housing Options (an
approach centred around earlier intervention and prevention of homelessness) in
reducing homeless applications has stagnated. Temporary accommodation figures
show that both the number of households and the number of children in homeless
temporary accommodation have increased for the fourth year running, up to
10,933 and 6,615 respectively, indicating a bottleneck on moving people on from
homelessness into settled accommodation. This shows the importance in looking
at a number of indicators to identify what difficulties certain groups are facing.

Fuel poverty targets are not ambitious enough

There are still 613,000 households in Scotland in fuel poverty under the current
definition, after a Scottish Government target to eradicate fuel poverty by
November 2016 was missed. It is unacceptable that so many households are
unable to meet their basic needs of heating their home and using cooking and
washing facilities without spending a large proportion of their income on energy.
The new Fuel Poverty (Target, Definition and Strategy) (Scotland) Bill is currently
making its way through the Scottish Parliament, setting a new target and strategy
to tackle fuel poverty, as well as introducing a new definition intending to focus
resources on those most in need. The bill proposes (though this stands to be
amended during stage 2 and stage 3 of the bill):
- A new definition, which would see 23.8% of households defined as in fuel
  poverty.[3]
- A target to reduce fuel poverty to no more than 5% by 2040
- An interim target that no more than 15% of households in Scotland should be
  in fuel poverty by 2030.

The attention on this issue is welcome. However, this ambition still falls short of
SDG Goal 1.2 to reduce poverty by at least half, and Shelter Scotland has
concerns that the needs of those living in rural areas (who are at high risk of fuel
poverty) will not be fully accounted for. Previous increase in fuel poverty rates
have been attributed to a rise in fuel costs and largely purported to be outwith the
Scottish Government's control, so future increases in fuel poverty may suffer the
same fate. In addition, there is a danger that the strategy will not be sufficiently
resourced to be successful. As such, whether the new targets currently being set
will be met remains to be seen.

[2] Shelter Scotland (2018), Getting behind the statistics: update for 2017-18,
https://scotland.shelter.org.uk/professional_resources/policy_library/policy_library_folder/getting_behind_the_homeless_statistics_update_for_2017
-18
[3] Scottish Government (2018), Draft fuel poverty strategy, https://www.gov.scot/publications/draft-fuel-poverty-scotland-2018/pages/4/

What do you think are the significant programmes, actions, strategies, and policies currently in place to help deliver this Goal in Scotland (of any scale) and what have they achieved?

When responding, please include detail on (where possible):

- **Name** of the programme, policy or action
- **Partners** involved in it
- **SDG target(s)** it contributes to
- **Links with other Sustainable Development Goals** that it also contributes to
- **Outcomes** and evidence on what is being achieved as a result

As above, the Fuel Poverty (Target, Definition and Strategy) (Scotland) Bill and the Fuel Poverty Strategy are in the process of being developed and if successful will assist towards meeting Goal 1.2 – to reduce at least by half the proportion of people living in poverty in all its dimensions, though the proposed 2030 interim targets are not ambitious enough.

In 2017, the Scottish Government convened a group of experts from across the sector to form a short-life advisory group, the "Homelessness and Rough Sleeping Action Group" (HARSAG) on which Shelter Scotland were represented. The group made 70 recommendations to the Government on how to end homelessness, and in November 2018, the Government and COSLA pulled these recommendations together into the Ending Homelessness Together High Level Action Plan. Shelter Scotland particularly welcomes the Action Plan's focus on preventing homelessness, creating person centred services and improving standards in temporary accommodation. Shelter Scotland remains involved in the process as the Government begins to consult on and implement areas of the action plan. The timescales for the action plan run to 2023 and outcomes to track success are currently being considered.

GOAL 3: Good Health and Well-being

We would encourage you to **consider your response in light of the SDG targets** for this indicator – see Ensure healthy lives and promote well-being for all at all ages – and also the **initial assessment of Scotland's performance in** the discussion paper published alongside this call for evidence.

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

The human right to health and the right to adequate housing are linked, and without tackling poor housing the goal to ensure healthy lives and promote well-being for all at all ages will not be met.

Specifically, research published in 2018 showed that: [4] [5]
- people who have experienced homelessness are more likely to have a health condition relating to either drugs, alcohol or mental health
- people who have experienced homelessness are more likely to have experienced multiple health conditions relating to drugs, alcohol and mental health
- for people experiencing homelessness more than once, the health activity and problems can be even more drastic.

What do you think are the significant programmes, actions, strategies, and policies currently in place to help deliver this Goal in Scotland (of any scale) and what have they achieved?

When responding, please include detail on (where possible):

- **Name** of the programme, policy or action
- **Partners** involved in it
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The relationship between making a homelessness application and more interactions with health services shows that the integration of housing advice in health settings is essential. The right advice, at the right time, can help ensure the housing safety net is in place for anyone who falls into housing crisis, ensuring everyone gets the support they need.

Shelter Scotland provides outreach advice services in many health locations, including in GP surgeries and specialist housing advice in A&E in Victoria Hospital, in Fife, as part of a two-year partnership project with Fife Health and Social Care Partnership.

We know that, in general, people who have experienced homelessness have

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[4] Scottish Government (2018), Health and Homelessness in Scotland, http://www.gov.scot/Publications/2018/06/7974/downloads
[5] Shelter Scotland (2018), Topic briefing: Health and homelessness 2018, https://scotland.shelter.org.uk/professional_resources/policy_library/policy_library_folder/health_and_homelessness_2018

higher health needs than those who have not been through the homelessness system – particularly in relation to mental health and addictions. We also know, from the higher rate of missed appointments for people who have experienced homelessness, that people can find it harder to engage with traditional services during the crisis of homelessness. Again, this shows the need for an integrated response to ensure that the health needs of this group are adequately met, and for health and housing services to work together to tackle health inequalities and both prevent and alleviate homelessness.

Shelter Scotland has commissioned research this year to establish what practical changes are needed to improve service provision for people experiencing homelessness with mental health difficulties so that they can access and receive the right support for them.

Getting this right can reap huge benefits for the health service in terms of reduced costs, for tackling homelessness, and most importantly for people experiencing the crisis of homelessness.

GOAL 7: Affordable and Clean Energy

7 AFFORDABLE AND CLEAN ENERGY

We would encourage you to **consider your response in light of the SDG targets** for this indicator – see Ensure access to affordable, reliable, sustainable and modern energy – and also the **initial assessment of Scotland's performance in** the discussion paper published alongside this call for evidence.

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

Goal 7 relates to ensuring access to affordable, reliable, sustainable and modern energy for all.

As referred to earlier, fuel poverty in Scotland is a significant issue.

Fuel poverty targets are not ambitious enough
There are still 613,000 households in Scotland in fuel poverty under the current definition, after a Scottish Government target to eradicate fuel poverty by November 2016 was missed. It is unacceptable that so many households are unable to meet their basic needs of heating their home and using cooking and washing facilities without spending a large proportion of their income on energy. The new Fuel Poverty (Target, Definition and Strategy) (Scotland) Bill is currently making its way through the Scottish Parliament, setting a new target and strategy to tackle fuel poverty, as well as introducing a new definition intending to focus resources on those most in need. The bill proposes (though this stands to be amended during stage 2 and stage 3 of the bill):
- A new definition, which would see 23.8% of households defined as in fuel poverty.[6]
- A target to reduce fuel poverty to no more than 5% by 2040
- An interim target that no more than 15% of households in Scotland should be in fuel poverty by 2030.

The attention on this issue is welcome. However, this ambition still falls short of SDG Goal 1.2 to reduce poverty by at least half, and Shelter Scotland has concerns that the needs of those living in rural areas (who are at high risk of fuel poverty) will not be fully accounted for. Previous increase in fuel poverty rates have been attributed to a rise in fuel costs and largely purported to be outwith the Scottish Government's control, so future increases in fuel poverty may suffer the same fate. In addition, there is a danger that the strategy will not be sufficiently resourced to be successful. As such, whether the new targets currently being set will be met remains to be seen.

What do you think are the significant programmes, actions, strategies, and policies currently in place to help deliver this Goal in Scotland (of any scale) and what have they achieved?

When responding, please include detail on (where possible):

- **Name** of the programme, policy or action
- **Partners** involved in it
- **SDG target(s)** it contributes to

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[6] Scottish Government (2018), Draft fuel poverty strategy, https://www.gov.scot/publications/draft-fuel-poverty-scotland-2018/pages/4/

- **Links with other Sustainable Development Goals** that it also contributes to
- **Outcomes** and evidence on what is being achieved as a result

As above, the Fuel Poverty (Target, Definition and Strategy) (Scotland) Bill and the draft Fuel Poverty Strategy are in the process of being developed and if successful will assist towards meeting Goal 1.2 – to reduce at least by half the proportion of people living in poverty in all its dimensions, though the proposed 2030 interim targets are not ambitious enough.

The Energy Efficient Scotland programme of work includes efforts to improve the energy efficiency of Scotland's homes, including implementing minimum energy efficiency standards in the private rented sector.

GOAL 11: Sustainable Cities and Communities

We would encourage you to **consider your response in light of the SDG targets** for this indicator – see Make cities inclusive, safe, resilient and sustainable – and also the **initial assessment of Scotland's performance in the discussion paper published alongside this call for evidence.**

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

Goal 11.1 'by 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums' is the focus of Shelter Scotland's response to this question. Shelter Scotland believes that Scotland is currently not on track to meet the SDG ambition for adequate housing.

Everyone needs good quality housing to live and thrive in: having a home is central to every aspect of our wellbeing, from health to educational attainment to happiness.[7] Yet there are 10,000 households in temporary accommodation; 14,000 children who were homeless last year; thousands who live in homes that are overcrowded or don't meet their needs;[8] and many more who are forced to sleep rough, on a friend's sofa, or choose between heating or eating. For all these people, a good home is out of reach.

Housing is a human right, and is defined as such within the Universal Declaration of Human Rights, but there is still work to do for that right to be realised in Scotland, and to make sure that everyone has access to a safe, secure and affordable home. Shelter Scotland's recent paper on housing as a human right[9] details some examples of where the right to adequate housing is currently being denied, and the reasons and solutions to this. Whilst the number of homes not meeting the Scottish Housing Quality Standard (currently at 45% of all homes), is one indicator, there are many more which illustrate the scale of Scotland's housing crisis:

- In 2017-18, 34,972 households applied as homeless in Scotland.[10] This is a 1% rise on 2016-17; the first increase since 2008-09. This small increase follows a levelling off of the number of applications over the past few years, and shows that the impact of Housing Options (an approach centred around earlier intervention and prevention of homelessness) in reducing homeless applications has stagnated.
- Temporary accommodation figures show that both the number of households and the number of children in homeless temporary accommodation have increased for the fourth year running, up to 10,933 and 6,615 respectively, indicating a bottleneck in moving people on from homelessness into settled accommodation.
- 613,000 households, or 24.9% of all households in Scotland, are currently living in fuel poverty, as referred to previously.
- 66,000 households are experiencing overcrowding, over 1 in 10 households are experiencing dampness or condensation (or both), and 131,900 households were on local authority housing waiting lists across Scotland on 31st March 2018, with a further

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[7] Commission on Housing and Wellbeing (2015), Final report: A blueprint for Scotland's future, http://housingandwellbeing.org/documents
[8] Shelter Scotland, Key Statistics webpage, https://scotland.shelter.org.uk/housing_policy/key_statistics/homelessness_facts_and_research
[9] Shelter Scotland (2019), Housing is a human right, https://scotland.shelter.org.uk/professional_resources/policy_library/policy_library_folder/housing_is_a_human_right
[10] Shelter Scotland (2018), Getting behind the statistics: update for 2017-18, https://scotland.shelter.org.uk/professional_resources/policy_library/policy_library_folder/getting_behind_the_homeless_statistics_update_for_2017-18

25,900 on transfer lists.
- 35% of people in Scotland are living in homes that do not meet the Living Home Standard – a standard developed by the public, for the public, outlining what the public expects an acceptable home should provide. This standard is the result of research undertaken by Ipsos MORI on behalf of Shelter in 2016.[11]

Shelter Scotland's experience shows that many more people outwith these statistics are also struggling to find or keep an adequate, safe or affordable home that meets their needs. Out of the 21,290 people helped by our housing advice and support services in 2017/18,[12] the biggest reason that people came to us for help in 2017/18 was because they were struggling to pay or afford their housing costs. More than a third (36%) of all our clients came from the private rented sector, demonstrating some of the scale of the difficulties private tenants face.

We also know that even where legislation is in place to ensure access for all to adequate and safe housing, this is not always the experience of our clients in practice. In 2017-18, there were 3,200 incidents where local authorities failed to provide homeless households with temporary accommodation when they were legally bound to do so.[13] [14]

Furthermore, despite the positive legislative commitment limiting the amount of time certain households should spend in temporary homeless accommodation defined as 'unsuitable' to seven days (largely referring to the use of B&Bs for families), in practice many families are still stuck in unsuitable accommodation well past the maximum period. Last year there were 400 placements across Scotland which have constituted a breach of the Unsuitable Accommodation Order, with 280 of these breaches occurring in Edinburgh.[15] [16]

What do you think are the significant programmes, actions, strategies, and policies currently in place to help deliver this Goal in Scotland (of any scale) and what have they achieved?

When responding, please include detail on (where possible):

- **Name** of the programme, policy or action
- **Partners** involved in it
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There have been significant legislative changes to the private rented sector in recent years, including the introduction of the Private Residential Tenancy agreement, the letting agent code of practice, and changes to the tribunal system. Ongoing monitoring is required to see how well the recent legislative changes to the sector will improve the situation for clients.

[11] Shelter Scotland (2018) Living Home Standard, https://scotland.shelter.org.uk/professional_resources/policy_library/policy_library_folder/living_home_standard
[12] Shelter Scotland (2018), Impact Report 2017/18, https://scotland.shelter.org.uk/professional_resources/policy_library/policy_library_folder/shelter_scotland_impact_report_201718
[13] Scottish Government (2018), Homelessness in Scotland 2017-18, https://www.gov.scot/publications/homelessness-scotland-2017-18/
[14] Shelter Scotland (2018), Evidence of Gatekeeping in Glasgow City Council, https://scotland.shelter.org.uk/professional_resources/policy_library/policy_library_folder/evidence_of_gatekeeping_in_glasgow_city_council
[15] Shelter Scotland (2018), Time in temporary accommodation 2018, https://scotland.shelter.org.uk/professional_resources/policy_library/policy_library_folder/time_in_temporary_accommodation_2018
[16] Scottish Government (2018), Homelessness in Scotland 2017-18, https://www.gov.scot/publications/homelessness-scotland-2017-18/

In 2017, the Scottish Government convened a group of experts from across the sector to form a short-life advisory group, the "Homelessness and Rough Sleeping Action Group" (HARSAG) on which Shelter Scotland were represented. The group made 70 recommendations to the Scottish Government on how to end homelessness, and in November 2018, the Government and COSLA pulled these recommendations together into the Ending Homelessness Together High Level Action Plan.[17] Shelter Scotland particularly welcomes the Action Plan's focus on preventing homelessness, creating person centred services and improving standards in temporary accommodation. Shelter Scotland remains involved in the process as the Government begins to consult on and implement areas of the action plan. The timescales for the action plan run to 2023 and outcomes to track success are currently being considered.

The Scottish Government committed to building 50,000 affordable homes during the current parliamentary term, which is the biggest affordable housing programme since the 1970s. Research shows they are on track for delivering this target, but while there is now an established Scottish Government commitment to deliver a step change in its social and affordable house building in Scotland, it is still not enough to meet the backlog of demand and projected rising need that exists across the country. The focus now needs to be on ensuring these are the right homes, in the right places, to meet need – and that this commitment to building at scale continues beyond 2021 to continue to meet demand.

What actions or next steps do you think Scotland should take in response to the key issues, challenges and opportunities you have highlighted?

When responding, please include detail on (where possible):

- **What action** you think is needed
- The **timeframe for the action** (e.g. immediate, medium or longer term)
- What possible **barriers exist** to taking effective action
- What will **help this action happen**

First and foremost, Scotland should be taking a human rights approach to housing.[18]

The First Minister's Advisory Group on Human Rights Leadership recommended a new Act of the Scottish Parliament on human rights in their final report to the First Minister in December 2018. The Advisory Group were set up in 2018 to recommend how human rights should be progressed in Scotland, and a new Act was amongst their seven recommendations. Specifically, they recommended that a new Act should include the right to adequate housing, alongside other economic, social and political rights, and those relating to civil and political and environmental rights.

A new Act of the Scottish Parliament on human rights could enshrine the International Covenant on Economic, Social and Cultural Rights, which includes the right to adequate housing, into domestic law. This would go some way to clarifying the right to adequate housing for everyone in Scotland, which existing domestic legislation falls short of doing. Clear legal rights are essential to enable the achievement of adequate housing for many people. A new Act would be a significant step towards legal protection for a safe, secure and affordable home for everyone.

However, any new law would need to learn the lessons from the past. A new Act

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[17] Scottish Government (2018), Ending homelessness together: high level action plan, https://www.gov.scot/publications/ending-homelessness-together-high-level-action-plan/
[18] Shelter Scotland (2019), Housing is a human right, https://scotland.shelter.org.uk/professional_resources/policy_library/policy_library_folder/housing_is_a_human_right

incorporating the right to adequate housing is the crucial first step to fill many of the gaps in existing domestic legislation, but it is not a panacea. Public authorities are not always held accountable, and it can be difficult for individuals to protect and enforce their rights even when they are clearly outlined in legislation. The details above highlight that, although there is a certain amount of monitoring through statistical returns provided by local authorities and published by national government, we are lacking true accountability of these public authorities and a clear remedy for individuals if rights are denied.

People need to know their rights, and understand them, and there must be true recourse to justice including access to legal aid and support to challenge authorities when things go wrong. We need to ensure these rights are enforced and protected to prevent systemic breaches, as well as ensuring there is adequate funding and support for public authorities and other duty bearers to deliver these rights for citizens in practice.