

Local Government and Communities Committee

Homelessness

Submission from Crisis

Crisis strongly welcomes the Committee's inquiry into homelessness. Scotland has ground-breaking legislation which gives some of the strongest rights in the world to people in Scotland who face homelessness. However, many homeless people face challenges in addressing their homelessness and finding suitable accommodation, and these challenges appear to be getting worse for a range of reasons.

This submission is a follow-up to the evidence Crisis provided to the Committee in March 2017. A copy of that evidence is attached. In summary, the key points made were:

- Many people struggle to access the support they need from statutory services to address their homelessness
- In Edinburgh people are now regularly being turned away from the City of Edinburgh Council homelessness services without help. This is largely as a result of a lack of temporary and permanent accommodation options in the city. Inability to access statutory support is also a well-known issue in Glasgow, with many people turned away without support
- Across Scotland, the range of housing options interventions being used do not appear to match with the causes of homelessness. There is room for a wider range of Housing Options approaches to be used. Levels of lost contact are high and the most common outcome recorded is making a homelessness application, which is not in itself an outcome for the applicant
- There is a tension between the non-statutory Housing Options prevention approach and the statutory homelessness duties
- The private rented sector (PRS) should be seen as an important housing option, particularly in the context of a shortage of permanent and temporary social housing
- Welfare reforms are having a significant impact on the range of housing options available, particularly for young people

In this supplementary submission, we address some of the additional questions set out in the Call for Evidence. We focus on temporary accommodation, the key components of approaches to addressing complex homelessness, further details of the legislative changes in other parts of the UK and Crisis' plan to end homelessness.

The following is a list of the key recommendations from the two evidence submissions:

- Scottish Government should examine the new prevention and relief duties in the Housing (Wales) Act 2014 and the Homelessness Reduction Act 2017 in

England to consider how prevention support could be improved in Scotland to provide a coherent route through local authority homelessness support.

- Government should legislate to ensure parity in law between single people and families so that no one should be in accommodation deemed unsuitable except in emergency circumstances, and only for a limited period of time.
- Housing First should be adopted across Scotland to meet the needs of people with complex needs, including rough sleepers.
- We believe a new strategic approach and ambition is needed to end homelessness in Scotland, and over the coming year we will develop a Plan to End Homelessness, in consultation with partners across Scotland. We hope that the Plan will be used to inform the work of the Group and the Scottish Government's agenda on homelessness going forward.
- We would be keen to keep the Committee informed as this work develops and present our findings and plan to the Committee at an appropriate stage.

Recommendations from previous submission

- There is substantial room for a more active and imaginative approach to Housing Options beyond straightforward information and advice giving
- To increase awareness of Housing Options services, local authorities should ensure that other public and voluntary organisations such as Jobcentres, health services, welfare rights and debt advice services are equipped to signpost people to Housing Options. This should include colocation of Housing Options services where appropriate
- The number of lost contacts from Housing Options and statutory homelessness services needs to be reduced, for example through outreach activity or working with the third sector to maintain contact and ensure they receive appropriate help.
- The PREVENT 1 housing options and HL1 homelessness datasets should be joined up coherently to ensure transparency in outcomes from Housing Options activity
- The guidance on discharge of a statutory homelessness duty into the PRS under Section 32A of the Housing (Scotland) Act 1987 needs to be revisited and consulted on to ensure it is still fit for purpose.
- We would like to see more support at Scottish level for local authorities to utilise the private rented sector as a route out of homelessness
- A National Rent Deposit Bond for Scotland would provide a national tool which accredited local authority and third sector schemes could apply for to support homeless people into the private rented sector.
- Local authorities should have coherent Housing Options strategies including a comprehensive range of housing options, with close links to other relevant services
- Scottish Government should examine the new prevention and relief duties in the Housing (Wales) Act 2014 to identify how prevention support could be improved in Scotland to provide a coherent route through local authority homelessness support.
- Consideration should also be given to how personal housing plans can support the journey through preventing and relieving homelessness.

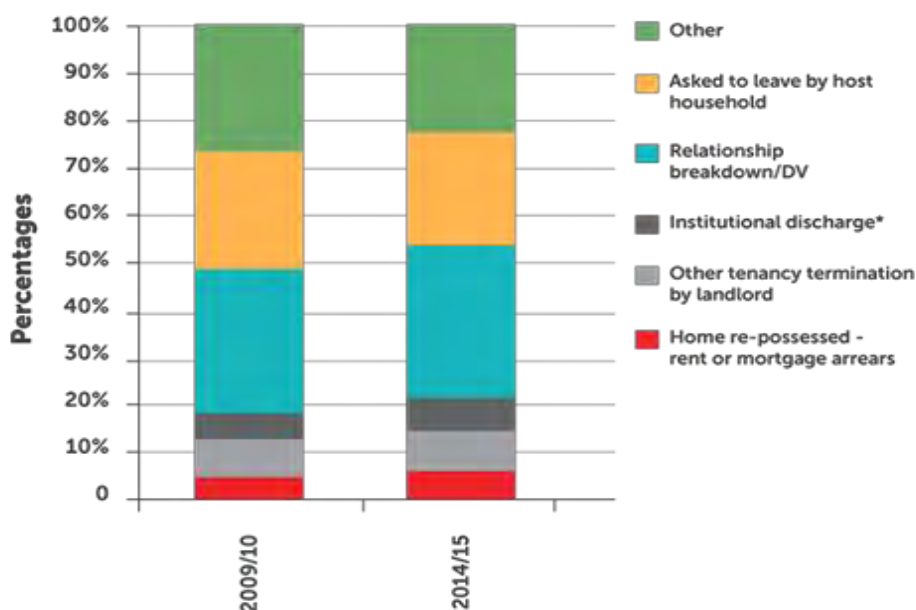
Introduction

Official homelessness applications have been falling in recent years since the ending of priority need in 2012 as a result of the introduction of the Housing Options approach from 2010, designed to prevent homelessness at an earlier stage. However, this reduction appears to be tailing off, with around 35,000 applications in 2015/16. and the proportion of people making homelessness applications who have support needs is increasing, from 34% in 2012-13 to 42% in 2015-16¹.

In addition there appears to be an increase in numbers of people sleeping rough particularly in the major cities in Scotland. There is evidence, particularly in Glasgow, that many of these people are not presenting to the Council for support.

Reasons for homelessness

The following chart shows that relationship breakdown and being asked to leave are consistently the primary reasons for homelessness in Scotland. The following chart was prepared using the Scottish Government's 2014/15 homelessness statistics. It shows that the major immediate reasons for homelessness are; being asked to leave the current household and relationship breakdown. Other causes are discharge from hospital, prison, care or other institutions, and losing the home through rent or mortgage arrears, both of which have risen slightly as a proportion of homelessness applications over the past five years. Termination of a private tenancy for rent arrears or other reasons makes up 10% of homelessness applications. This is in contrast to other parts of the UK where the ending of a private tenancy is the primary cause of homelessness.



¹ Scottish Government (2016) Homelessness in Scotland 2015/16

From Scottish Government

More generally however, homelessness is strongly associated with poverty, and those groups at particular risk of poverty, including young people and lone parents are also at higher risk of homelessness.

The increasing proportion of people with complex needs, combined with the visible rise in rough sleeping in our major cities, indicates the need for approaches which

Preventing homelessness: legislation in other parts of Britain

There is a tension between the statutory duty to provide settled accommodation to households who are homeless, and the Housing Options approach of preventing homelessness for those who are homeless or at risk of homelessness. Other parts of the UK have recently legislated to combine the duty to relieve homelessness with a new duty to prevent it occurring.

In Wales, the Housing (Wales) Act 2014 created a new statutory approach to preventing homelessness. An independent review commissioned by the Welsh Assembly identified two fundamental weaknesses in the existing system: that people not in priority need were not getting 'meaningful assistance', and that a growing emphasis on preventative ('Housing Options') interventions sat uncomfortably alongside the statutory system. This has led to concerns about both unlawful 'gatekeeping' and inconsistency in practice across Wales, similar to concerns currently being raised in Scotland.

The legislation, which came into effect in April 2015, creates stronger prevention and relief duties for eligible households, regardless of priority need status. The legislation is specific about the sorts of steps that local authorities should consider to demonstrate that they have helped relieve or prevent someone's homelessness.

- Local authorities now have a **duty to help prevent homelessness** for all eligible households threatened with homelessness within 56 days, irrespective of priority need, intentionality or local connection
- If they are not able to prevent the homelessness within 56 days, then they have a **duty to help secure accommodation**. The 'help to secure' duty is also applied regardless of priority need status and intentionality. Examples of help might include mediation, support with debt or rent arrears, advocacy, payment of grants, loans or guarantees of payment
- After a further 56 days, if the applicant's homelessness has not been successfully relieved and they are in priority need, have a local connection and are unintentionally homeless, the local authority **must make them an offer of settled accommodation** under the main homelessness duty. Notably though, local authorities can end their assistance to applicants who 'unreasonably fail to cooperate'.

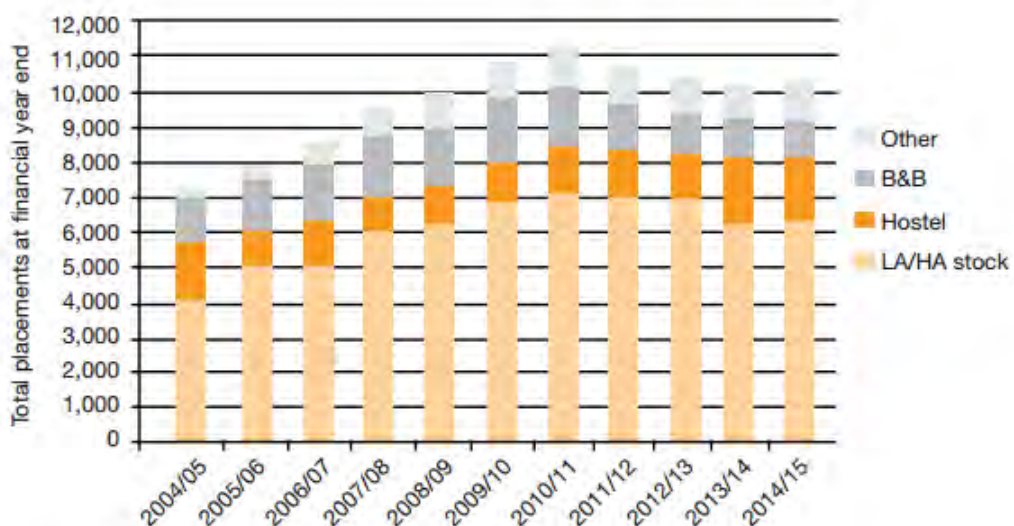
Initial data suggests that the new model is working effectively to prevent homelessness and reduce the number of households who progress to the main homelessness duty. In the first year of operation of this legislation, there was a 67% decrease in the number of households accepted as statutorily homeless. However there are concerns that a significant proportion of people are being deemed as failing to co-operate.

In England, the new Housing Reduction Act 2017, a private members' bill co-ordinated by Crisis, has been modelled on the Welsh approach. The English legislation also contains a duty on other public bodies to refer anyone it believes to be at risk of homelessness to the local housing authority. (The specific public bodies will be detailed in secondary legislation or guidance).

Scottish Government should examine the new prevention and relief duties in the Housing (Wales) Act 2014 and the Homelessness Reduction Act 2017 in England to consider how prevention support could be improved in Scotland to provide a coherent route through local authority homelessness support.

Temporary accommodation

The use of temporary accommodation has increased significantly in Scotland over recent years, rising from around 4000 households in temporary accommodation in 2002 to a peak of over 11,000 households in 2011. Since then numbers have levelled off to a little over 10,000 homeless households in temporary accommodation at any one time (see chart). This means that the proportion of households applying as homeless who are housed in temporary accommodation has risen from 1 in 10 in 2003 to 3 in 10 households in 2016.



Households in temporary accommodation. From Homelessness Monitor Scotland 2015, based on Scottish Government figures.

In Edinburgh, pressure on temporary accommodation is at an all time high, and our service finds that homeless applicants are being turned away from the council on a regular basis due to a lack of accommodation in the city.

Around two-thirds (63%) of temporary accommodation in Scotland is in the form of temporary furnished flats. However, Crisis is very concerned about the use of unsuitable forms of temporary accommodation, including bed and breakfast (B&B) accommodation to house homeless people for long periods of time. Use of B&B has fallen over time and some areas have eliminated the use of B&B completely. However, a small number of areas remain highly dependent on B&B. Around 1000 people a year continue to be housed in B&B. In Highland, 67% of single homeless people and in Edinburgh 49% are housed in B&B. Our experience in Edinburgh and the Lothians suggests that many single people are in B&B for well over a year.

Conditions vary considerably, but common issues in B&B include:

- No access to basic amenities such as refrigeration, cooking and laundry facilities
- Extremely limited rights, meaning people may be asked to leave with just a few hours' notice, and lack other basic rights such as to be able to come and go freely, or to stay away from their home overnight
- Isolation, especially where B&B provision is far from family and friends
- Lack of support
- Uncertainty about the future
- Non-resident parents not be allowed to have their children visit
- If several people are housed in one place by the council this can cause difficulties for vulnerable residents, who may feel threatened or return to lifestyles they have moved away from

Frank was placed in a B&B after he made a homelessness application to the council. He has nowhere he can store or cook food at the B&B. So he has to buy sandwiches and takeaway food, which he struggles to afford out of his Jobseekers' Allowance, or he walks to places he knows offer free food for homeless people. He feels frustrated that he has to rely on donations and can't manage his diet better, which he believes is affecting his health. His children are not allowed in the B&B and Frank is not allowed to spend nights away to visit them. So far he has been at the B&B for ten months and doesn't know how much longer he will be there.

Legislation states that unsuitable accommodation is not to be used for housing homeless families for more than 14 days, except in exceptional circumstances, and the Scottish Government monitors this closely to ensure compliance. Crisis would like to see **parity in law between single people and families so that no one should be in accommodation deemed unsuitable except in emergency circumstances.**

Supporting people with complex needs

The increasing proportion of people with complex needs, combined with the visible rise in rough sleeping in our major cities, indicates the need for approaches which specifically focus on this group within the homelessness population.

Housing First provides stable, independent homes alongside coordinated wrap-around, personalised support to homeless people. In contrast to the 'housing ready' or 'treatment first' approach of the UK hostel system, Housing First has been widely adopted in North America and Western Europe, including the U.S., Belgium and Spain, and has formed a central component of national strategies in Canada, Denmark, Finland and France to reduce and stem rising homelessness².

Housing First, which provides permanent housing for people with complex needs, has a strong international evidence base which demonstrates high tenancy sustainment rates and improved wellbeing outcomes. The JRF has estimated that after two years of implementing Housing First for 46,000 people, government would save £200 million per year³.

Crisis is conducting a feasibility study in the Liverpool City Region to look at the cost benefits of Housing First and the transitional costs of moving away from the current system. The study has been funded by DCLG and the European Housing First Hub, and it will report in June. Crisis welcomes the positive comments made by Scottish ministers regarding Housing First. **Housing First should be adopted across Scotland to meet the needs of people with complex needs, including rough sleepers.**

A co-ordinated approach to tackling homelessness

There is a range of good practice in addressing homelessness, particularly for people who experience enduring homelessness. Models such as Housing First are known to have major benefits for this group of people, and should be a core part of the range of housing options available to this client group, as discussed below. But, the following good practice examples show some of the key aspects for co-ordinating and aligning services more widely to meet the needs of people with a complex range of needs:

Community Solutions is a US organisation which has developed innovative approaches to accommodating people experiencing chronic homelessness and / or facing disability. Through the 100,000 Homes Campaign and Built for Zero initiative, their strategy focusses on reinventing the systems and resources local areas need to end homelessness. The following areas are key to the approach:

² Homeless Link, Housing First in England: The principles, London: Homeless Link, 2016

³ JRF (2016) UK Poverty: causes, costs and solutions, York: JRF

- Using data to drive change. Monthly housing placements are the key metric, housing lists are by individuals' names, and data is also used to identify upstream system failures.
- Shifting norms and mindsets. Often the resources are already available within local areas but people need to believe that change is possible. There needs to be a rigorous and collaborative problem-solving approach and practice needs to shift to reflect this.
- Test and learn. Small tests of change to check what works, followed by developing it at larger scale once an idea has been evaluated with objective data.
- Reducing inflow. Data is used to target systems further upstream which are causing flows into homelessness. Outflow is made an outcome measure for services such as criminal justice and foster care, and sending people to shelters is no longer seen as an option.

In the seven years since developing this approach, 170,000 people have been housed across the US as a result.

Making Every Adult Matter is a coalition of four partners in England: Clinks⁴, DrugScope, Homeless Link and Mind. The approach provides a non-prescriptive framework for developing co-ordinated services for people with multiple needs, such as homelessness, substance misuse, mental health problems and offending. Often these people will have ineffective contact with services.

Starting off with three pilots, it now operates in 13 areas in England. Areas work with between 20 and 50 clients. It consists of seven elements:

1. Partnership and audit
2. Consistency in client identification
3. Co-ordination for clients and services
4. Flexible responses from services
5. Service improvement and gap filling
6. Measurement of success
7. Sustainability and systems change

Findings from the original pilots showed:

- Up to 26% reduction in service use costs over two years
- Significant reduction in costs associated with crime
- 86% report their housing situation improved
- 71% consuming less drugs/alcohol
- 57% better mental health

These examples demonstrate that there is commonality across approaches to co-ordinating services, particularly for people with more complex issues. These include

⁴ Clinks has closed down as of April 2015

a clear approach to identifying clients, co-ordination of services, the effective use and sharing of data is key, and ability and flexibility to learn and innovate to change and improve services.

A plan to end homelessness

The Homelessness Prevention and Strategy Group, jointly chaired by COSLA and the Scottish Government, is the primary vehicle for a co-ordinated strategic approach to addressing homelessness in Scotland. We welcome the housing minister's commitment to refreshing this group, and look forward to seeing details of what a future workplan for this group will look like.

We believe a new strategic approach and ambition is needed to tackling homelessness in Scotland.

In Crisis' 50th anniversary year, we want to find solutions and develop a plan which will end homelessness. Our proposed definition⁵ for what this would mean covers:

- No one sleeping rough
- No one in shelters, hostels or other emergency accommodation without a plan to move into appropriate accommodation within a reasonable timescale
- No one living in dangerous or insecure accommodation or situations
- No one homeless as a result of leaving the care system, prison or state institutions
- Everyone at immediate risk of homelessness gets the help that prevents it happening

In all these areas there is room for further work in Scotland, both in the immediate and longer term. As discussed elsewhere in this evidence, there is an urgent need to address the dependency of long stays in temporary accommodation. Too many people continue to leave prison and care each year without a clear accommodation plan and end up reliant on homelessness services, and there is considerable scope to have a more effective preventative approach to homelessness in Scotland.

We believe that this goal of ending homelessness is bold but achievable, not just for Scotland but across Great Britain. Over the coming year, we will be working with individuals, partner organisations and statutory agencies across Scotland to consult on and develop a plan for ending homelessness in Scotland, England and Wales.

We will publish this in spring 2018, and we are very pleased that the Housing Minister has agreed to review this with the Homelessness Prevention and Strategy Group and that Crisis have been invited to participate in this group. **We hope that the Plan will be used to inform the work of the Group and the Scottish Government's agenda on homelessness going forward.**

⁵ https://www.crisis.org.uk/media/237330/crisis_proposed_definition_of_ending_homelessness.pdf

We hope the findings of the Committee's inquiry will be able to feed into that process. **We would be keen to keep the Committee informed as this work develops and present our findings and plan to the Committee at an appropriate stage.**



Local Government and Communities Committee Inquiry into Housing Options

Evidence from Crisis March 2017

About Crisis

Crisis is the national charity for homeless people. We are dedicated to ending homelessness by delivering life-changing services and campaigning for change.

Crisis Skylight Edinburgh works with around 600 people a year, primarily from Edinburgh, but also from the wider Lothian area. We are a non-commissioned service, working with people who are currently or recently homeless, or at risk of homelessness. We take referrals from a wide range of places including other voluntary organisations, social work and self-referral, and we run drop-ins at council homelessness services, Jobcentre offices and the winter night shelter in Edinburgh.

We use a coaching model to help people take control of their journey out of homelessness, through one-to-one work with progression, work and learning, and housing coaches. We also provide courses and other learning opportunities to help people engage, develop skills and self-confidence and gain qualifications.

For the past decade, Crisis has worked with local authorities and voluntary organisations across Scotland to support Help to Rent schemes, providing help to people on low incomes or at risk of homelessness to access the private rented sector. We are also funded by Scottish Government to support the development of sharing options for homeless people, necessary as a result of changes to social security benefits for housing costs.

Crisis has a strong reputation for campaigning and research work. We have recently carried out a feasibility study on developing a Centre for Homelessness Impact in Scotland in partnership with Glasgow Homelessness Network, which would draw together best practice in homelessness prevention and assistance to equip services to meet the needs of homeless people as effectively as possible.

Overview

This response focuses on the help that people get to prevent and deal with homelessness. It covers:

- Experiences from our Crisis Skylight Edinburgh service

- Analysis of Housing Options interventions and outcomes across Scotland
- Use of the private rented sector as a Housing Option
- The impact of welfare reforms on Housing Options, particularly for young people
- The importance of having a strategic range of Housing Options available
- The tension between homelessness rights and homelessness prevention
- Crisis' ambition to end homelessness

Key recommendations

- There is substantial room for a more active and imaginative approach to Housing Options beyond straightforward information and advice giving
- To increase awareness of Housing Options services, local authorities should ensure that other public and voluntary organisations such as Jobcentres, health services, welfare rights and debt advice services are equipped to signpost people to Housing Options. This should include colocation of Housing Options services where appropriate
- The number of lost contacts from Housing Options and statutory homelessness services needs to be reduced, for example through outreach activity or working with the third sector to maintain contact and ensure they receive appropriate help.
- The PREVENT 1 housing options and HL1 homelessness datasets should be joined up coherently to ensure transparency in outcomes from Housing Options activity
- The guidance on discharge of a statutory homelessness duty into the PRS under Section 32A of the Housing (Scotland) Act 1987 needs to be revisited and consulted on to ensure it is still fit for purpose.
- We would like to see more support at Scottish level for local authorities to utilise the private rented sector as a route out of homelessness
- A National Rent Deposit Bond for Scotland would provide a national tool which accredited local authority and third sector schemes could apply for to support people on low incomes into the private rented sector.
- Local authorities should have coherent Housing Options strategies including a comprehensive range of housing options, with close links to other relevant services
- Scottish Government should examine the new prevention and relief duties in the Housing (Wales) Act 2014 to identify how prevention support could be improved in Scotland to provide a coherent route through local authority homelessness support.
- Consideration should also be given to how personal housing plans can support the journey through preventing and relieving homelessness.

Experiences from Crisis Skylight Edinburgh

Reasons for homelessness

Crisis Skylight Edinburgh works in Edinburgh and the surrounding area with a wide range of clients, including people recently released from prison, users of the winter

night shelter, people in temporary accommodation, people who have been served a notice to quit by their landlord, people who have experienced relationship breakdown and domestic abuse, etc.

The reasons for homelessness are varied. For some people their circumstances are relatively straightforward and their primary need is to find housing, for example as the result of the loss of a tenancy or following a relationship breakdown. For others, loss of housing is part of a wider range of issues in their lives, which might include loss of employment, lack of confidence or self-esteem, mental health issues, a history of offending or substance abuse. Crisis tends to work with people who may need some additional help, whether due to their individual circumstances or an inability to access the support needed from other services. We work with people holistically to address the full range of issues to enable them to move on to a more stable situation.

We work with a large number of EEA nationals. For homeless people from this group finding work as quickly as possible generally has to be the first step in finding somewhere to live.

Accessing support

In our experience, many people struggle to access support from the council to address homelessness. Often this is the result of suggestions made by reception staff that it is not worth someone's while seeking help at this point, perhaps because of long waiting times to see a housing officer or because they do not have the appropriate documentation with them. While this may seem to be practical advice at the time, it can act as a deterrent to seeking support.

In some cases people who are coming at an early stage to avoid homelessness, for example having received a notice to quit from their landlord, are told that they should come back when they are actually homeless.

If people do not have identification which proves their residence, do not have an active benefit claim or alternatively do not have proof of employment a suggestion may be made that it is not worth waiting for the several hours it will take to see a housing officer. Our progression team now often works with people to get this information together before supporting them to go to the council for help.

We find that if someone is intentionally homeless or has no local connection, it is often suggested that it is not worth their while waiting for a long period to see a housing officer as they do not have a right to permanent accommodation. However they do have a right to 28 days' accommodation and, in the case of local connection, to be referred back to their originating local authority. This advice can thus be misleading for those who are uncertain about their rights, and can mean people miss out on help they are entitled to.

In some cases, people may believe that they have asked to make a homelessness application but when we speak to the council they have recorded that the individual just asked for advice.

Our experience with different local authorities is very variable, but we find people often need to be assertive to get help.

After he was released from prison on bail, John went to live with a family member. However, he was asked to leave and went to his local council because he had nowhere to live. They refused to help him as they said he was asking for a bail address, which they would not provide. John was not asking for a bail address, and John had a legal right to accommodation regardless.

John came into contact with Crisis when he was sleeping in the night shelter. We worked with him to contact the council again so that he could get the help he was entitled to. It became apparent that despite several interviews with the council, they had not carried out a homelessness assessment. After considerable pressure they finally carried out a homeless assessment, nearly four months after John first went to the council. They assessed him as not being homeless, in clear contradiction of the Code of Guidance.

Eventually, with Crisis' support, John found his own tenancy in a neighbouring local authority. He has overcome major hurdles to move away from his life prior to going to prison, including months with no accommodation. The staff working with him have commented on his exceptional tenacity and resilience in the face of prejudice and obstruction from agencies who should have been helping him.

Commissioning homelessness prevention work

In Edinburgh much of the homelessness prevention support is commissioned from voluntary organisations, including housing advice, tenancy support and visiting support. This has benefits, for instance third sector organisations can bring significant expertise, but it can also mean that an individual's journey to get help can be very disjointed. It can also mean that the council do not have the skills or resources to deal with a case inhouse.

Stefan was served a Notice to Quit by his landlord. He went to his local council housing office for help. They just accepted the Notice to Quit, and did not check it or speak to the landlord. Stefan later came to Crisis, who called his landlord and negotiated for Stefan to continue to stay in the tenancy.

Louise approaches the council because she has received a notice to quit from her landlord and is at risk of homelessness. The council refers her to specialist housing advice organisation to check whether the notice to quit is valid. They find that it is not valid and provide advice on the next steps that Louise needs to take. However, Louise also has a number of support needs which means that she will struggle to

pursue the advice and may need further support to maintain the tenancy. She therefore requires the help of a third organisation who are commissioned to provide tenancy support.

Our experience of working in the Edinburgh and wider Lothian region suggests it can be difficult for people facing homelessness to get the help they need. This may be because of overstretched resources, a lack of joined up services, and in some cases obstruction by service staff.

Housing Options interventions and outcomes across Scotland

Official statistics on Housing Options prevention work have been published for the past two years⁶. Between April 2014 and March 2016 there were 116,000 approaches to Housing Options services in Scotland. There appears to be a slight downward trend in the number of Housing Options approaches over time.

The introduction of Housing Options has led to a significant reduction in the number of homelessness applications made to Scottish local authorities. However the Scottish Government's analysis suggests that this decline is slowing, and they conclude that this means that there is unlikely to be further substantial reductions in the numbers of homelessness applications as a result of the Housing Options approach⁷.

The reasons for approaching Housing Options are recorded either for prevention reasons or for homelessness reasons. Across Scotland, most Housing Options approaches are for homelessness reasons (60% in the first quarter of 2016). For Housing Options work to be effective, the earlier someone approaches the council the better. This can be challenging as people do not always approach early. It is important that people are aware of the service. **To increase awareness, local authorities should ensure that other public and voluntary organisations such as Jobcentres, health services, welfare rights and debt advice services are equipped to signpost people to Housing Options should it become apparent that a problem may be emerging.** Where appropriate Housing Options staff should be co-located so that referrals and handovers can be carried out quickly and easily.

Crisis Skylight Edinburgh has built strong links with High Riggs and Wester Hailes Jobcentres in Edinburgh. Following discussions with the Jobcentre partnership managers, staff from the Skylight progression team hold weekly drop-in sessions in the Jobcentres, and are receiving referrals direct from Jobcentre staff too.

⁶ Scottish Government (2016) Housing Options (PREVENT1) Statistics in Scotland: 1 April 2014 to 31 March 2016

⁷ Scottish Government (2016) Homelessness in Scotland 2015/16

Building the links has strengthened the Jobcentre's awareness of homelessness, and they now regularly ask clients about their housing situation. They are finding they have many clients who are on the verge of homeless and people who can't move forward to find work because of their housing situation. Finding out this information at an early stage makes it easier to address the problem before it reaches crisis point and people lose their accommodation, and also means that the Jobcentre can ensure that they work appropriately with the client to move towards employment.

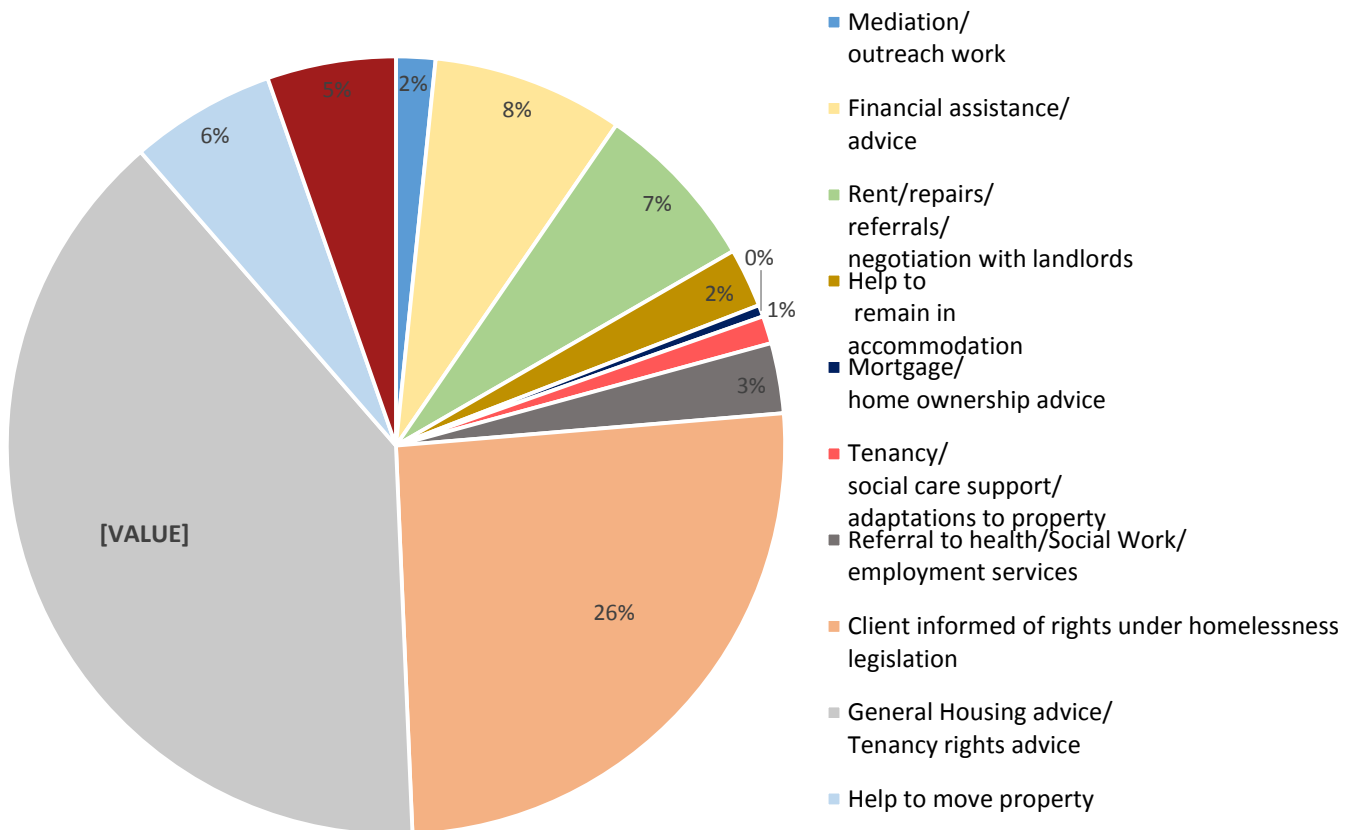
Housing Options activities

A wide range of Housing Options activities are listed in the data collection but heavy reliance is placed on just two of these areas, informing people of their rights, and providing general advice. Financial assistance and advice is the third most commonly used activity, amounting to just 8% of all work (chart 1).

Local authorities vary considerably in how they use these different options. For example in Dundee City and West Dunbartonshire over half of Housing Options clients are informed of their rights under the homelessness legislation, compared to only 5% in Argyll & Bute.

The majority of people who make homelessness applications come through Housing Options (70%, see below), so looking at the reasons for a homelessness application gives a more detailed picture of what might be the most useful Housing Options interventions to focus on.

Chart 1: Housing Options activities across Scotland



From table 6b, Housing Options (PREVENT1) Statistics in Scotland: 1 April 2014 to 31 March 2016

The most common reason for given for making a homelessness application is being asked to leave the household (26%), followed by non-violent relationship breakdown or household dispute (17%)⁸. Mediation can be a useful tool particularly for young people in either reconciling parties, or creating a breathing space to allow a managed move rather than an emergency one. However, only 2% of Housing Options activity is classified as mediation or outreach.

Termination of a tenancy, either in the social or private sector, accounts for around 14% of homelessness applications, yet rent, repairs and negotiating with landlords makes up only 7% of Housing Options activity. Again there is significant local variation: in some local authorities, repairs, rent and negotiating with landlords makes up more than a quarter of activity, while in other areas it is barely used at all.

⁸ Scottish Government (2016) Homelessness in Scotland 2015/16

It has been reported that the number of evictions is growing in both the social and private rented sectors⁹, possibly due to rent arrears associated with welfare reforms, particularly in the social sector¹⁰. At present private landlords do not have to provide a reason for ending a tenancy so it is difficult to get a clear picture of what is happening in the private sector. However in the future landlords will have to give specific reasons for ending a tenancy. **Where this leads to a homelessness application this data should be collected in the future.**

Discharge from institutions such as prison and hospital accounted for 2,300, or 6%, of homelessness applications in 2015/16. This is another area where there is scope for further prevention work.

The Homelessness Monitor: Scotland 2015¹¹ reports that:

“there is... a picture emerging of relatively ‘light touch’ Housing Options interventions in any cases, with 56% of all approaches resulting in activities on the part of the LA that did not exceed active information, signposting and explanation (mostly generally housing advice), with ‘casework’ of some kind being carried out in 44% of approaches (most commonly information clients of their rights under the homelessness legislation)” (p15).

The authors note that this conclusion is supported by the findings of the Scottish Housing Regulator’s Thematic Inquiry into Housing Options in 2014¹².

The financial benefit to public services of preventing homelessness is clear. Research commissioned by Crisis compared the costs of preventing homelessness, compared to allowing it to continue¹³. Using four vignettes of typical situations, the costs of preventing homelessness typically worked out at around £1,500 for an individual starting out with low levels of support needs. Allowing homelessness to continue for twelve months raised the costs to £5,000 to £20,000. Many of these costs accrue outside the primary homelessness system, particularly criminal justice, health (notably A&E), as well as social work and the social security system.

This suggests **there is substantial room for a more active and imaginative approach to Housing Options beyond straightforward information and advice giving, and for some areas in particular to widen the range of activities they undertake.**

⁹ Scottish Housing News (2016) Concerns raised as evictions increase by 18 per cent <http://www.scottishhousingnews.com/8433/concerns-raised-as-evictions-increase-by-18-per-cent/#>

¹⁰ Fitzpatrick et al (2015) Homelessness Monitor Scotland 2015

¹¹ Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. & Watts, B. (2015) The homelessness monitor: Scotland 2015. London: Crisis / JRF

¹² Scottish Housing Regulator (2014) Housing options in Scotland: a thematic inquiry

¹³ Pleace, N (2015) At what cost? An estimation of the financial costs of single homelessness in the UK. London: Crisis

Outcomes

Outcomes data is collected for Housing Options cases. The most common recorded outcome is making a homelessness application, accounting for around half of all approaches (see table 1). However, this in itself is not an outcome for the individual concerned is less a homelessness outcome than a step on the journey towards addressing homelessness¹⁴.

It is also not clear how positive outcomes such as remaining in current accommodation are. In addition it is worth noting that around 18,000 (15%) of Housing Options approaches remain as open cases. 15% of Housing Options approaches are repeat approaches.

Table 1: Housing Options outcomes

Made homelessness application to the local authority	48%
Remained in current accommodation	22%
Lost contact / Not known	16%
Social tenancy	4%
Private rented tenancy	4%
Moved in with family / friends	2%
Other known outcome	5%

From table 7b Housing Options (PREVENT1) Statistics in Scotland: 1 April 2014 to 31 March 2016

We are concerned about the high rate of lost contacts: for around one in six housing options approaches the recorded outcome is lost contact, or 15,800 cases over the two years of data. This was highlighted by the Housing Regulator in 2014 in their report on Housing Options. Lost contacts are also a feature of statutory homelessness support, with 18% of homelessness applications having lost contact as the outcome.

It would be useful to know more about the profile of this group of people. While some may have low level needs and resolve their homelessness by themselves following some advice, it is likely that some of these cases are people in vulnerable or chaotic situations who may have nowhere to sleep that night. In that case **services need to find ways to maintain contact with them, for example through outreach activity or working with the third sector to maintain contact and ensure they receive appropriate help.**

It is worth noting that the proportion of homelessness applicants with support needs is increasing, with 34% of applicants having one or more support needs in 2012-13

¹⁴ Fitzpatrick et al (2015)

to 42% in 2015-16. This may indicate that Housing Options is helping those with no or lower support needs without them having to make a homelessness application. Alternatively it may mean that the support needs of homeless people are increasing.

Data linkage

For nearly half of people approaching Housing Options the outcome of this work is that they go on to make a homelessness application. Between April 2015 and March 2016 23,600 people made a homelessness application having come from Housing Options, out of a total of 33,400 homelessness application¹⁵, or around 70% homeless applicants.

It is possible to track cases through both the PREVENT1 housing options data and HL1 homelessness data. At present Housing Options prevention data and the HL1 homelessness data are published as separate reports, and in the last year's reports were analysed using different timescales, homelessness data on a one year basis, and prevention data on a two year basis.

It will be important to join up these two datasets more coherently to ensure transparency in outcomes from Housing Options activity, for example to monitor the outcomes of the homelessness applications made by people coming via the Housing Options route. It would be very valuable to look at longer term outcomes. This might include whether accommodation outcomes are sustained over time, and whether Housing Options clients go on to make a homelessness application at a later stage, to gain a sense of the success or otherwise of the intervention.

Data linkage with other areas can also be useful in providing information about outcomes. For example, NHS Fife has led the way in linking health data with HL1 homelessness data. There is also work going to cross reference data on people accessing council-based homelessness and housing options services with data from homelessness voluntary organisations, building on work such as that done by Glasgow Homelessness Network¹⁶. While data should not be collected for its own sake, if used strategically, such data linkage can provide helpful information to services about individuals and groups who are accessing multiple services, and assist with planning and integrating services to meet people's needs more effectively.

Private rented sector as a Housing Option

Crisis has supported private rented sector (PRS) access schemes across Scotland for more than a decade. The Homelessness Code of Guidance states that each local authority should ensure that a rent deposit / guarantee scheme is available. Two-thirds of these PRS access schemes are now located within the local authority. Their

¹⁵ Scottish Government (2016) Homelessness in Scotland 2015/16

¹⁶ See for example <http://www.ghn.org.uk/our-work/inquiry/homelessness-monitoring/homelessness-monitoring-reports/>

minimum function is to provide rent deposit bonds, but some provide a much greater level of support including tenancy support, landlord liaison, fast track housing benefit claims, direct payments to landlords and wider benefits advice.

An effective access scheme supports the local authority to meet their statutory duties and reduces pressure on temporary and permanent social accommodation. The private rented sector (PRS) can offer a number of benefits to tenants, including choice of location, flexibility for work, and often being fully furnished.

6% (1,444) of unintentionally homeless households, and 10% (324) of intentionally homeless households were discharged into the PRS in 2015/16. The statutory homelessness duty can be discharged through a PRS tenancy if the tenancy lasts for at least 6 months. The local authority should also ensure during this time that the tenancy is affordable for the tenant.

The new tenancy regime coming in next year will make the PRS a more secure housing option for private tenants. **The guidance on discharge of a statutory homelessness duty into the PRS under Section 32A of the Housing (Scotland) Act 1987 needs to be revisited and consulted on to ensure it is still fit for purpose.**

We would like to see better use of Private Rented Sector Access Schemes. At present around 2,500 households are supported into a tenancy by one of 30 local schemes (Aberdeen and Angus are the ones without a scheme). 90% of those housed by PRS schemes are referred by Housing Options teams.

However, there are major differences in quality of the scheme, for example Dundee City Council house 300 households whereas a number of local authorities struggle to get into double figures. This includes Edinburgh where a private company is paid to run the PRS Access Scheme.

<p>Crisis have housing coaches working in each Skylight centre. Despite a very pressured housing market in Edinburgh, in his first year the Edinburgh Skylight housing coach helped around 45 people into accommodation in the private rented sector. Almost all of these people were in temporary accommodation. Those who were not would have ended up in temporary accommodation if Crisis had not intervened.</p>

Through our Scottish Government funded work on the private rented sector, we have found that the most common cause for lack of take up of the PRS at the Housing Options stage is the way it is presented to clients. Negative views of the PRS are passed on by some housing staff and despite the recent improvements to standards, redress and security of tenure there are still issues with staff promoting the positives of the PRS.

PRS access schemes can also have a positive impact on temporary accommodation use. Fife Keyfund, who are the Crisis PRS Champions in Scotland, have been instrumental in lowering temporary accommodation (TA) use in Fife. The Fife Council plan to phase out all B&B use and significantly reduce Private Sector Leasing by increasing the number of tenancies created by Fife Keyfund (Fife currently do 250 tenancies a year including 25 shared tenancies) Edinburgh City Council's use of TA has increased significantly since the collapse of the PRS Access Scheme.

Despite recent welfare reforms there are still a significant number of properties in the PRS that can be used to house people in Scotland. The introduction of the new more secure tenancies early next year should make the PRS more attractive as a housing option, and councils need to make sure they have the right resources in place to support people into a PRS tenancy.

Crisis have been funded since 2005 by the Scottish Government to provide training and support for PRS Access Schemes, unfortunately this funding has been withdrawn, and from 1st April no Scottish Government funding will be available to support the development and improvement of PRS Access Schemes.

We would like to see more support for local authorities to utilise the private rented sector as a route out of homelessness, such as a fund for pilot projects on Housing First in the PRS, Private Sector Leasing schemes which convert to short assured tenancies, and leasing spare 3 and 4 bedroom social stock to use for sharing for those under 35s only eligible for the shared accommodation rate.

A National Rent Deposit Bond for Scotland, a paper deposit bond underwritten by the Scottish Government, would provide a national tool which accredited local authority and third sector schemes could apply for to support people on low incomes into the private rented sector.

Impact of welfare reforms on housing options

A range of welfare reforms are having an impact on the ability to prevent or address homelessness.

Local Housing Allowance and Shared Accommodation Rate

Caps and freezes on the amount of housing costs support (either through Housing Benefit or through Universal Credit) mean that the private rented sector is likely to become increasingly difficult to access. These caps are also due to be introduced into the social sector in 2019.

These caps are particularly challenging for people under the age of 35 who are only entitled to sufficient support to afford a room in a shared house (called the Shared Accommodation Rate), not to have a tenancy of their own. In the Lothian region in 2016/17 this means £68.27 a week.

Local authorities and housing associations are still working out how sharing in the social sector will work in practice, and how to manage any shortfall in rents. The Scottish Federation of Housing Associations estimates that this will affect 241,000 tenants¹⁷, who will face an average shortfall of £6.22 a week.

The Westminster government has also said the rates of support, known as Local Housing Allowance, will be frozen at their current levels until 2020, irrespective of what happens to rent levels.

Housing costs for under 22s

From 1 April 2017 new regulations are being introduced which mean that 18-21 year old jobseekers are not entitled to housing support through Universal Credit. There are a small number of exceptions, including where the young person is in temporary accommodation or there is a serious risk to the young person in staying at home.

The regulations were laid on 3 March 2017 in Westminster. DWP are still working on the guidance to implement these regulations. For under 22s, it may be very difficult to move on from temporary accommodation unless they are in full-time employment. Scottish Government has said that it will mitigate this change but the mechanism is still to be developed.

These changes mean that people on benefits or low incomes, and particularly young people have fewer housing options available to them in future.

A strategic approach to Housing Options

Housing Options support needs to be developed as part of a coherent strategy for assisting people who are homeless or at risk of homelessness, recognising the role of different tenures and the challenges posed by changes to social security support.

For some of these people relatively low level interventions such as budgeting advice or advice of negotiating with a landlord will be all that is required to prevent them becoming homelessness. Other people may need more of a casework approach, such as a young person who can be reconciled with their family but needs interim supported accommodation and mediation to enable that. For people with the most enduring or complex needs access to models like Housing First should be included as part of a strategy.

Such a strategy should ensure that there is a comprehensive range of options and that there are close links with other services both within the council,

¹⁷ <http://www.sfha.co.uk/what-we-do/policy-category/social-security/sub-category/lha-cap/policy-article/over-240000-more-tenancies-in-scotland-will-be-affected-by-the-widened-scope-of-the-lha-cap>

including social work, young people’s services and other agencies including health, prisons, third sector, etc.

Homelessness rights and preventing homelessness

In Scotland our strong homelessness rights means that if someone is homeless they have a right to statutory support, eventually leading to a permanent tenancy. Most often this will be a social tenancy. It has always been recognised that this is in tension with a prevention approach and concerns that adopting a prevention approach could be perceived (rightly or wrongly) as “gatekeeping” the statutory support and preventing people from accessing this right.

In May 2014 the Scottish Housing Regulator’s inquiry on Housing Options identified this tension and noted that they had found evidence of people being inappropriately diverted away from a homelessness assessment. In some cases this was supported by the use of targets which encouraged this behaviour. Our experience suggests that at least in some parts of Scotland people facing homelessness continue to struggle to access the statutory support they are entitled to.

The Regulator recommended that the Scottish Government produce guidance to local authorities to provide greater clarity about the relationship between Housing Options and statutory homelessness support¹⁸. This guidance was published in March 2016.

Crisis is not in a position to comment on how the guidance is being used following its introduction, but we believe that there are lessons to be learnt from other parts of the UK in their approach to prevention.

The Housing (Wales) Act 2014 balances homelessness prevention and relief duties to provide a coherent system of support for people threatened with homelessness. In the first year of the operation of this legislation, there was a 67% decrease in the number of households accepted as statutorily homeless¹⁹.

Many Welsh local authorities are using Personal Housing Plans to help both the council and the individual identify what steps need to be taken to resolve their homelessness or threatened homelessness. This provides transparency and accountability for both parties, so that people have clarity about their rights and responsibilities at each stage of the process and know exactly where they are within the system.

Scottish Government should examine the new prevention and relief duties in Wales to identify how prevention support could be improved in Scotland to provide a coherent route through local authority homelessness support.

¹⁸ Scottish Housing Regulator (2014)

¹⁹ Fitzpatrick, F. et al (2016) Homelessness Monitor Great Britain

Consideration should also be given to how personal housing plans can be used on an individual level to support this journey.

Ending homelessness in Scotland

Scotland has made significant progress, leading the way internationally with strong rights to support if you become homeless. We are rightly lauded for this. However, we believe that a new ambition is needed, to end homelessness in Scotland.

Countries such as Canada and Finland are now leading the way in developing plans and strategies which are making major inroads on addressing homelessness.

In Crisis' 2016 Manifesto to End Homelessness²⁰, published in advance of the Scottish parliamentary election, we called for action in five areas to tackle homelessness. Key to this work is a new national co-ordinated approach to provide a strategic drive for addressing the causes and consequences of homelessness.

Crisis is holding a conference in Glasgow in May 2017 where we will kickstart a year-long process of consultation on how we should go about ending homelessness in Scotland. Our intention is to work together with homeless people, politicians and government, the third sector and other relevant agencies across Scotland to develop a shared, coherent plan that will end homelessness, which we plan to publish during 2018. We would be delighted to work with the Committee as this work progresses.

Beth Reid
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Crisis

²⁰ Crisis (2016) Manifesto to End Homelessness
http://www.crisis.org.uk/data/files/publications/Crisis_ScotlandManifesto_2016_Update.pdf