

Local Government and Communities Committee

Homelessness

Submission from COSLA

Introduction

COSLA welcomes the opportunity to respond to this call for evidence and we are encouraged by the Local Government Committee turning its attention to this important subject. Given the timing of this inquiry, COSLA does not have the political governance structures to endorse the text of this submission. Nevertheless, given councils' integral role in preventing and responding to homelessness, we feel it is important that the Committee receives evidence from Local Government. The response is consistent with previous cross party positions adopted by COSLA's elected members (including a paper to Convention in March 2017) and draws on advice from Local Government officers and conversations with SFHA.

We look forward to engaging further in this inquiry and hope that our spokesperson and other elected representatives can be invited to provide further evidence on Local Government's strategic views at a later date. Our submission below begins with some COSLA key messages before directly addressing the questions set by the Committee.

COSLA key messages

Local authorities' role and interest in homelessness stems not only from our statutory local housing authority responsibilities, but also from our wider responsibility to improve outcomes for our communities. Councils contribute to tackling homelessness mostly through housing and homelessness services but also in a variety of indirect ways. These include: providing or commissioning advice and advocacy services; administering aspects of social security and providing advice; contributing to health and social care outcomes through Integrated Joint Boards; engaging with and regulating private landlords; encouraging local economic development; as a major employer in the area; and, perhaps most importantly, as the lead authority in Community Planning Partnerships (and other areas of multi-agency partnership work such as Community Justice).

With this in mind, we advocate an integrated, whole-system approach to preventing and responding to homelessness to address social inequalities in keeping with the spirit of the Christie Commission and Scotland's efforts to achieve public service reform. We would like to convey the following key messages to the Committee.

1. A focus on prevention.

Three of the most common causes of homelessness are poverty, relationship / family breakdown and individuals having multiple complex needs. None of these issues are solved through housing alone – preventative support services have been cut to people at risk of homelessness as a result of

pressure on public services. In-work poverty and welfare changes have put many more at risk.

2. Political leadership and accountability.

We acknowledge the concern from Shelter and others that homelessness requires political leadership. Importantly, we believe this requires a combined effort from Local and Scottish Government. While services need to be delivered at a local authority for the purposes of good accountability, local efforts can be supported by strategic direction and leadership at a national level through the Homelessness Prevention Strategy Group (HPSG).

3. The housing market (including the Affordable Housing Supply) must cater to those in most need and be developed strategically to prevent homelessness.

It is clear that there needs to be an increase in the affordable housing supply – and we are working with Scottish Govt and RSLs to increase stock. While numbers are important, Scotland must also take an intelligent approach to the *type* of home that is being built and its affordability. This requires creativity in fabric design and also surfaces questions about the purpose of social housing in Scotland and how the property market can be influenced to work for communities. We would welcome a conversation with the Scottish Government and other stakeholders about how this vision might be developed further.

4. A joined-up, multi-agency approach.

Services demand contribution from all agencies (especially health, justice and social security), as well as private and social landlords but should continue to be locally planned and led by the council as the closest accountable level of government to our communities. The need for multi-agency working aligns with COSLA and Scottish Government's commitment to the principles of public service reform outlined in the Christie Commission.

5. A focus on outcomes and people rather than outputs and statistics.

Homelessness statistics alone and taken at face-value often tell us little about the reality on the ground. We need to be more focused on people. Quantitative indicators have their place as a tool for accountability and transparency but there are dangers in using these alone in the absence of contextual qualitative information.

6. A need for evidence-based policy.

In particular we need to know more about rough sleeping (not to be confused with street begging) and about temporary accommodation (i.e. reasons for lengthy stays and myth-busting about standards).

7. Tackling poverty and mitigating welfare reforms.

It is imperative that any response to homelessness considers the impact of poverty on housing outcomes, that is to say their ability to pay rent, and maintain an adequate standard of living. The Scottish Government, Local Government and other public bodies have a role to play in tackling poverty through mitigating welfare reforms which threaten to increase homelessness, targeting support to people in poverty and as responsible employers.

Questions posed by the Committee

Housing Options and Homelessness Prevention

How do you feel housing options and homelessness prevention is working in practice? Are there examples of good practice?

Our view is that Housing Options (HO) generally works well, offering vital housing support and information to people with a housing need. While the fundamental constraint on HO is pressure on resources, it is most effective when delivered at the earliest possible opportunity and linking in with services that go wider than housing (e.g. money advice and signposting to mental health services). Housing Options services could therefore benefit from a programme of improvement. Building on the strong foundation provided by the Scottish Government / COSLA joint guidance, such a programme could further develop the capacity of and knowledge within Housing Options services. As such, HO services would become increasingly holistic and focused on early intervention. We would anticipate the soon-to-be-published Housing Options Toolkit to be a part of this.

While we understand calls for a consistent, templated approach to be replicated across the country providing a standardised Housing Options service, we believe a key strength of HO is its capacity to be flexible to local circumstances and its facilitation of links between agencies and other bodies at a local level. That a service is not provided in a uniform manner does not necessarily undermine its quality nor the intended outcomes – the case for this is set out well in the Commission on Strengthening Local Democracy. The Housing Options Hubs provide an invaluable source for sharing good practice and there are a wide range of innovative approaches to delivering the service across councils. The best of these take a holistic approach to advice and offer or signpost to preventative interventions although it is important to be clear that the greatest barrier to such work is a lack of resource and a large workload rather than a lack of willing to think outside the box.

We also recognise the concerns about the lack of harmony between Housing Options and homelessness statistics. This relates to our overarching view that a person-centred, outcomes-based approach should be taken to homelessness which is not purely driven by local or national statistics.

How effective is the relationship between all the relevant agencies, including the health sector, and charities working on homelessness prevention?

Firstly, we welcome the Committee turning its attention to the importance of good relationships between agencies. In the spirit of the Christie Commission and in keeping with COSLA and Scottish Government's commitment to public service reform we believe partnership working between agencies at an area-based level is the best way to deliver improved outcomes.

Community Planning arrangements should remain the key mechanism for this partnership work to take place. Planning services at a CPP level ensures a locality-based approach within administrative boundaries (i.e. local authority area) which are supported by a democratically elected layer of governance and which are recognised by all existing services and third sector organisations. With regard to homelessness, it should be noted that Local Housing Strategies are written along local authority boundaries and should relate to efforts around homelessness.

Turning to specific relationships between relevant agencies, these are variable by local authority area but local authorities are clear that they wish to encourage partnership working at all levels. While it is not the role of the housing sector to 'fix' community planning, the joined-up approach to homelessness suffers from the same barrier as in other sectors i.e. agencies' reluctance or inability (through regulation) to contribute actual resources to preventative work.

We have been encouraged to see the **Health** service turn its attention to health and homelessness through Directors of Public Health (ScotPHN) in particular and the health sector is clearly now aware of the links between housing and health outcomes. That said, it is important to now meet this with action on the ground and that any changes to service delivery consider what preventative activity the health service can undertake to improve housing/homelessness outcomes, rather than simply focusing on how housing can improve health.

Similarly, the **Scottish Prison Service** (and the justice sector in general) is increasingly aware of how experience of the justice system exacerbates the risk of homelessness. We hope that the SPS's efforts to increase its contribution as a community planning partner – particularly through the new Community Justice local partnership model – can lay the foundations for better links between prisons and other services to avoid homelessness on liberation. SOLACE and SPS are currently working on practical ways to achieve this.

Third sector organisations also have a key role to play in tackling homelessness and should be involved in delivering and co-producing services. They are often well-equipped to reach those who are uncomfortable interacting with statutory services and can form relationships with homeless people in a way statutory services may struggle to.

The **private rented sector** (PRS) should also be considered in conversations around homelessness. Private rented accommodation plays a hugely important part in the housing market by either providing opportunities for people either at risk of homelessness or freeing up stock in the social sector. On the other hand, the PRS

can be a barrier to tackling homelessness and we are aware that many private landlords find ways of avoiding offering tenancies to people receiving welfare payments. It is important that landlords are engaged better and they should be included in conversations around multi-agency working.

Finally, it is worth noting the paramount nature of a good relationship between local authorities and **housing associations** within multi-agency arrangements. As issues around homelessness receive more attention from the public and elected members, it is important that councils and RSLs are not pitted off against one another. A good working relationship including an agreed approach to allocations is the only way to deliver outcomes for homeless people.

To aid the success of multi-agency work at a local level, there must be strong national, strategic leadership. The Homelessness Prevention Strategy Group (HPSG) is the ideal vehicle to provide this albeit we recognise it has been less active than is useful in the past year. We are looking forward to a conversation with Scottish Government about how best to take this forward this Ministerial / COSLA advisory group.

What needs to happen to improve the delivery of housing options and homelessness prevention services and the outcomes achieved for service users?

There are three fundamental things that might benefit Housing Options (HO) services. Firstly, as the HO toolkit is about to be published, we believe those delivering and managing HO services would benefit from a programme of improvement. This may be best delivered through the Housing Options Hubs and would include a conversation about the breadth of Housing Options and its links to other advice services. Secondly, preserving the local element of the HO approach is crucial to its success. Thirdly, HO delivery and improvement work should be fully resourced if it is to be successful. The conversation about resourcing should also take into consideration the benefits of HO to services beyond housing.

We would also like to raise with the Committee, the need to continually improve options for single people (among whom there has been an increase in homelessness). This may require a more innovative approach to the physical make-up of accommodation (e.g. sharing) and to supporting people to find 'flatmates' (e.g. through digital solutions). We would encourage the viability of shared accommodation to be examined as a potentially effective route to providing stable accommodation for people with experience of homelessness. While not an unsurmountable barrier, the incoming Scottish standard tenancy does not encourage landlords to pursue options like this.

What role should private sector housing providers play in preventing and responding to homelessness?

As stated above, private sector providers are a key partner and we should seek to bring them on board as early as possible. Councils and others can work with the private rented sector to remove barriers to renting and ensure people receive support if they are at risk of becoming homeless from private rented accommodation. The other significant role of private providers is their capacity to build affordable

homes. Direct or indirect intervention in the private housing market to encourage affordability and good practice among landlords can be supported by strong political leadership between Local Government and Scottish Ministers.

It is concerning that current DWP changes (such as built-in delays to initial payments of Universal Credit, LHA caps and the public perception of uncertainty in the welfare system) may have an impact on the willingness of the PRS to accept social tenants. We understand CIH are undertaking research on the likely impact of the LHA cap and the removal of entitlement of young people to the housing element of UC which we would draw the Committee's attention. While we understand that there are likely to be exceptions to the operation of this policy, we are particularly concerned that it will further constrain access to housing for young people and will increase periods in temporary accommodation.

Temporary Accommodation

What evidence is there of pressure on temporary accommodation in your area? Has this increased in recent years?

In keeping with our call for evidence-based policy we would urge caution over how temporary accommodation statistics are used in national debates about homelessness. For example, there can be a range of good reasons for people to be in temporary accommodation including tenants' choice to be located in a certain area or a desire to avoid the disruption of a further move. Figures outlining the number of children in temporary accommodation can also be misleading as there are instances where a child with separated carers may be recorded twice (e.g. once per parent) or recorded in temporary accommodation without that being their normal residence. Similarly, while it is important to hold landlords RSL / local authority landlords to account on temporary accommodation standards, they are often better than those in private accommodation. With all of this in mind, it is important to focus on personal outcomes rather than on numbers alone – if a household understands their situation and is happy for a period in temporary accommodation to be extended, then a provider should feel able to focus its efforts and resources on other activities rather than being driven by temporary accommodation figures alone.

COSLA would be interested to hear from councils and providers of temporary accommodation about the pressures on these services and we are acutely aware of the funding gap in temporary accommodation of which we have made the Scottish Government aware. Finally, it should be noted that stock transfer authorities are entirely reliant on contracting the provision of temporary accommodation from RSLs and private landlord partners, presenting further challenges to managing temporary accommodation.

How can homeless people's experiences of temporary accommodation be improved? For example, how can the use of unsuitable accommodation be reduced or the length of time spent in temporary accommodation reduced?

As indicated above, to improve homeless people's experience of temp. accom. COSLA would advocate a person-centred and outcomes-focused approach to moving people into suitable, stable accommodation rather than solely working to

numerical targets. It is important not to fixate on statistics about time spent in temporary accommodation – rather, we want to see a person-centred and outcomes focused approach to moving people into suitable, stable accommodation.

The social environment in temporary accommodation is often problematic and, as such, homeless people's experience could be improved by physical improvements conducive to a more supportive environment and also by enhancing the support offered to people in supported accommodation (i.e. mental health services, money advice, employability). Fundamentally, the best way to reduce the use of temporary accommodation is to take a preventative approach to tackling poverty and the root social causes of homelessness rather than through approached to managing temporary accommodation.

Do you have concerns about the funding of temporary accommodation? If yes, how should temporary accommodation be funded?

COSLA has made its views clear on the funding of temporary accommodation in various forums and with Scottish Ministers. This is a topic that does not go away. Fundamentally, a variety of welfare changes have severely restricted the ability of councils to fund their temporary accommodation. In particular, the gradual replacement of Housing Benefit support by Universal Credit restricts the ability of councils to cover the additional running costs of management, security and furniture and fitting provision and replacement through tenants' benefit entitlement. Restrictions on Local Housing Allowance have added to pressures as have collection difficulties in areas where the full Universal Credit is rolling out. The shortfall in funding, even after distribution of c£22m homelessness funding to councils following the abolition of the TA management Fee, is estimated to be at least £20m per year and likely to be considerably higher.

While councils will seek to re configure services to better address current needs and reduce funding pressures, many local authorities will struggle to maintain the quantity and quality of services against tight overall budgets. Impacts of the LHA cap, particularly on young people is also likely to reduce the range of affordable accommodation and extend lengths of stay in temporary accommodation. We hope consideration can be given to additional funding at least in the short term by Scottish Government to support councils to re configure services.

Permanent Accommodation

How do social landlord's allocation policies prioritise applications from homeless households and how does choice based lettings work in practice?

COSLA will also be interested to hear the responses to this question as allocations policies are clearly fundamental to tackling homelessness. We would like to make the point that local flexibility is a key strength of the approach current allocations policy across Scotland, allowing councils and social landlords to work together to design a housing system that works for the specific needs of their population.

Councils are working closely with the Scottish Government to support its target of building 50,000 affordable homes. It should be emphasised at every opportunity that a healthy affordable housing supply is a key component in tackling homelessness.

Multiple and Complex Needs

What more could be done to ensure that the needs of homeless people with multiple and complex needs are adequately supported? Are there examples of good practice?

COSLA advocates a person-centred, local partnership approach and a focus on prevention in order to support people with multiple and complex needs. This requires a form of intervention that combines anti-poverty measures, mental health support, money advice, a justice system focused on rehabilitation and a supportive social environment – all things which cannot be delivered by one single agency.

We recognise the current interest in the Housing First model and believe this can be a solution for some people with multiple and complex needs. Some councils have looked into this and it is evident that Housing First might be pursued more widely if there was resource available to deliver what is an expensive service to run. Psychologically Informed Environment (PIE) approach is also something we are aware can result in positive outcomes.

What scope is there for improved joint working with all agencies and groups supporting those with multiple and complex needs, which would also include the health sector?

It is notable (as pointed out by ALACHO) that the statutory duties in homelessness only apply to local authorities. It could be argued that the current statutory framework does nothing to encourage other agencies to support the housing outcomes of those with multiple and complex needs.

Similar to our earlier point, multi-agency work is best planned and delivered in the context of a Community Planning Partnership at a local level. Local authorities are best placed to lead this work as a democratically elected sphere of government and as the strategic lead for community planning arrangements. One fundamental barrier to effective joined up work is the reluctance or inability for agencies to contribute resources to collaborative activity. As noted above, joint working can only become a reality if it is driven at a strategic level and this does require an element of leadership at a national level – particularly where national organisations such as SPS or Police Scotland are concerned.

The health sector's recognition of the links between health and housing is discussed above and we believe there is scope to learn and expand some of the good practice. The development of a public health workforce in Scotland presents an opportunity to further improve this work and to improve homeless prevention, we would like to see mental health being an integral part of this work. One approach for consideration may be to place a duty on Community Planning Partners or to ensure homelessness prevention is incorporated into the social and economic duty.

How can access to general health services, including preventative health services, be improved for homeless people?

This problem can be tackled by tackling stigma among homeless people and providing adequate training to front line health workers to be able to identify potential indicators of housing need and to be able to signpost to relevant services. In particular, GP surgeries and A&E can make a contribution to this. In this context it is also crucial that physical and mental health issues are treated equally.

Clearly the Integrated Joint Boards have a key role to play in ensuring homelessness services and health services can work together. The housing contribution statements show early signs of positive action but we would like to see this improve further. The development of a public health workforce in Scotland presents an opportunity to further improve this work.

What role could the “housing first” model play in improving outcomes for homeless people with multiple and complex needs?

As indicated above, Housing First is an exciting model with a lot of potential. For social landlords to be able to take the ‘risk’ on Housing First, it is imperative that other agencies are not only on board but are able to contribute adequate resources to maintain the service.

Rough Sleeping

How has the pattern of rough sleeping changed in your area? For example, is the number of rough sleepers increasing or have the characteristics of rough sleepers changed? What are the reasons for this?

Much of the evidence we hear is anecdotal but deeply concerning. COSLA would welcome an agreement on definitions and support on gathering robust evidence on rough sleeping and will listen closely to voices in the third sector as to how this can be tackled. There are a variety of causes from poverty and having no recourse to public funds to a rejection of emergency bed and breakfast accommodation.

It is important not to confuse rough sleeping with street begging – both are separate issues with separate solutions. As the Committee will be aware, rough sleeping is mainly cities (particularly Glasgow and Edinburgh) which clearly requires a tailored policy response. As such we need more understanding about the local nature of rough sleeping as well as national factors.

What type of accommodation is offered to rough sleepers? / What type of approaches can contribute to the reduction of rough sleeping and achievement of sustainable housing solutions for rough sleepers?

We are aware of the important contribution made by the third sector in providing accommodation to rough sleepers. Streetwatch services work well and a proactive approach is best however it must be recognised that this is difficult to do properly

with a lack of resource. Services often offered best by third sector street workers – but it is important that a local approach is taken.

Other

What are the reasons behind why people become homeless?

The Committee has heard and will hear from expert voices on why people become homeless. From a local authority perspective, many homeless people fall into that situation as a result of one or a combination of factors, most commonly including family/relationship breakdown, multiple and complex needs and poverty. In order to tackle each of these, a preventative approach is required that goes beyond housing interventions, which is why a multi-agency response to homelessness is crucial.

About poverty, the arguments around the impact of welfare changes are well rehearsed but cannot be overemphasised. Delays to payments built into the system, the erosion of support levels, increased sanctions and the legislative barriers to people who do not qualify for certain benefits all combine to push people into poverty and financial chaos – through no fault of their own – in not being able to pay their rent. With some local authorities on full UC, the evidence is now going beyond the anecdotal and is translating into a spike in rent arrears which we are deeply concerned will result in an increase in homelessness as it already seen in parts of England.

We have been working with our members, particularly Highland Council and East Lothian Council whose experience of UC proves the impact many had feared. On top from the impact on revenue accounts (well-evidenced by data from Highland and East Lothian), the impact on people threatens to be severe.

Meanwhile the benefit cap also has an impact. As a short-term measure the Highland Council fully mitigated the impact of the changes to the benefit cap by awarding Discretionary Housing Payments (DHPs) from the date the cap is applied to 31 March 2017. It is unlikely that full mitigation will be available for 2017/18.

Refugees and asylum seekers

It is worth highlighting here the specific challenges faced by refugees and asylum seekers who have an increased risk of homelessness.

COSLA recently submitted supplementary information for the Scottish Parliament Equalities and Human Rights Committee inquiry on Destitution, Asylum and Insecure Immigration Status in Scotland. We highlighted that, despite receiving no funding from either UK or Scottish Government, local authorities and individual local authority officers seek to deliver the best outcomes for people for whom they have a statutory responsibility, and will continue to do so.

Current data from the UK NRPF Network for 43 local authorities across the UK, including Glasgow and Edinburgh City Councils, highlights that they spent a combined total of £36.4 million in 2016/17 supporting families with NRPF. These are housing and financial support costs only and do not include staff time and resources,

so are an underestimate of the true cost to councils. 29% of referrals were taken on for support, and the average number of days on support was 869, which was an increase from the previous year. 17% of the households supported were lawfully present with NRPF and had been prevented from accessing mainstream benefits by the UK Government for immigration control purposes

We would wish to return to what was perhaps the overarching point that we, and others, sought to make to the Committee; namely that destitution is an inevitable consequence of the UK Government's approach to immigration and asylum policy. It is worth continuing to explore how housing support to refugees and asylum seekers can be enhanced.

What data is used to measure homelessness numbers in a particular area?

The Scottish Government homelessness statistics are the main source of information on homelessness. We increasingly believe that HN1/2 and temporary accommodation statistics are not a useful indicator of success in homelessness interventions and so we would welcome a conversation with Scottish Government about a more outcomes-based approach.

Can you give examples of best practice of effective strategic coordination of services to ensure there are no gaps or overlaps in homelessness services?

We have already made the case above for the Community Planning Partnership approach to be the cornerstone of strategic coordination, and there is an important contribution to be made by the development documents such as the Local Housing Strategy and an IJB's local housing contribution statement. We believe the Homelessness Prevention Strategy Group has a role in providing national strategic direction to this and that the Housing Options Hubs are best place to continue sharing of good practice between key partners.

Are there any problems with people accessing their housing and homelessness rights? If yes, how can access be improved?

Some of this topic has been covered above and the best way to ensure people access their rights is to make public services accessible and proactive in engaging with the people they are there to support. Concerns are often voiced around how RSLs and local authorities work together to ensure nobody falls through the net and everyone is provided for and treated fairly. That relationship between RSLs and local authorities is perhaps an early item for the HPSG to consider.

What are the barriers to providing homeless people with sustainable housing solutions and how can these barriers be addressed?

Barriers to providing homeless people with sustainable housing solutions include the stigma around homelessness which can affect their ability to access services and the fact that there is a small but significant group of homeless people with multiple and complex needs. People's ability to find work and maintain that employment is also an important contributing factor.

In responding to the Committee's inquiry on homelessness, it would be remiss not to mention the gradual erosion of council funding and the impact this will inevitably have on services. Cuts to council budgets and other public services risk hollowing-out 'softer' preventative services which offer valuable support and advice to people at risk of homelessness.

It is also important that funding issues are considered in the round and pressure on resources within council housing budgets can have an impact not only on our ability to build more homes but also to explore creative solutions for people at risk of homelessness. It is becoming increasingly untenable that development costs fall on social tenants who are, by definition, among the poorest in our communities.

Are there any other issues relating to homelessness which you wish to bring to the attention of the Committee?

Finally, we would like to emphasise the importance of political and strategic leadership in order to tackle homelessness. The Homelessness Prevention Strategy Group is a recognised forum co-chaired by COSLA and Scottish Government and should continue to be the primary mechanism for providing strategic direction to national efforts to tackling homelessness. We have had early discussions with the Scottish Government and look forward to exploring this further.

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