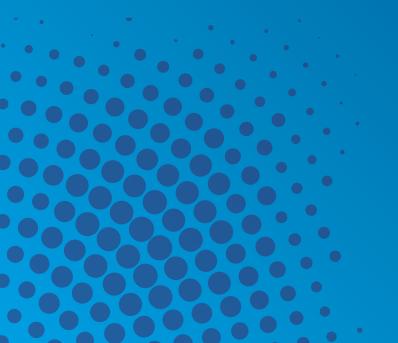


# Rapid Rehousing Transition Plans, temporary accommodation and housing options: a survey of Scotland's local authorities



# Background - homelessness policy context in Scotland

The Homelessness and Rough Sleeping Action Group (HARSAG) was established by the Scottish Government in 2017 and tasked with making recommendations on immediate actions needed to tackle rough sleeping and longer term recommendations on the transformation of temporary accommodation and how to end homelessness in Scotland.

The Scottish Government accepted all of the recommendations in principle, introducing the **Ending Homelessness Together Action Plan** backed by £50 million of funding. As part of the plan to transform temporary accommodation and homelessness services, all local authorities in Scotland were asked to develop a five year Rapid Rehousing Transition Plan (RRTP). The RRTPs set out local context and challenges and how each local authority plans to reduce the use of temporary accommodation (especially hostel and B&B accommodation), moving towards housing people in mainstream accommodation as quickly as possible if they have low support needs or providing Housing First for people with more complex needs.

In 2019 Crisis published <u>an overview of all RRTPs</u>, highlighting different approaches being taken by local authorities across Scotland. Many of these RRTPs have now been updated.

HARSAG was reconvened in 2020 to make <u>further</u> recommendations taking into account the impact of the pandemic and the Scottish Government subsequently published an <u>updated Action Plan</u>.

Following HARSAG recommendations, the Scottish Government has also introduced several significant changes to homelessness legislation and has set out intentions for further changes including:

- Extension of the Unsuitable Accommodation Order to all homeless households.
- Introduction of recommended minimum standards for temporary accommodation (to be replaced with mandatory standards).
- Removal of the power to make local connection referrals.
- Changes to intentionality.
- Introduction of a duty to prevent homelessness (recommendations being considered).

# Survey methodology and responses

In order to gain a better understanding of local authorities' progress with implementing RRTPs, the impact of the pandemic and whether existing housing options are suitable to meet people's needs, CIH Scotland carried out an online survey of local authorities across Scotland with the support of the Association of Local Authority Chief Housing Officers (ALACHO).

All 32 local authorities were invited to participate in April 2021 and we received a total of 30 responses including quantitative and qualitative data. A summary of these responses and proposed recommendations was presented at an ALACHO meeting and further feedback from attendees was taken into account in the drafting of this report.

# Summary of findings and recommendations

This section summarises some of the themes that came up throughout the survey and key recommendations. The next section gives a more detailed overview of the findings including examples given by respondents and recommendations for changes to support the Scottish Government's ambition to end homelessness.

Progress on implementation - RRTPs are not statutory documents and there are no formal reporting structures in place or agreed performance measures. As such, local authorities take different approaches to monitoring progress, there is no central location to access RRTPs or information on performance and there is a lack of clarity on whether objectives are being achieved. The Scottish Government should work with local authorities through the Homelessness Prevention and Strategy Group (HPSG) and RRTP working group to develop a more formal framework for monitoring progress and performance. This should build upon existing reporting mechanisms and help to measure success and identify where changes in approach or further resources are required.

Funding for RRTPs - while the £50 million Ending Homelessness Together Fund has been welcome, the short term nature and uncertainty created by annual funding awards has made it difficult to plan transformational change and to recruit and retain staff. Lack of funding has also resulted in scaling back of plans or slower implementation in some areas. Lack of funding was also cited as a barrier to introducing or expanding Housing First projects. The Scottish Government must provide longer term funding certainty if local authorities are to achieve the ambitions set out in RRTPs.

Timescales for transforming services - while some local authorities reported being on track to meet their RRTP ambitions, others stated that even if they had been on schedule prepandemic, work had since been delayed or put on hold. The Scottish Government must take a longer term view to tackling homelessness with at least a ten year plan for whole system transformation including key partners such as health and social care. There must be recognition that homelessness is not just a housing issue and stronger leadership on this point is required at national and local level.

Affordable housing supply - lack of affordable housing options in many areas makes it difficult to move households out of temporary accommodation, resulting in lengthy stays. There are particular issues in rural areas, high demand areas, areas with low stock turnover and with a lack of one bedroom homes, larger homes and adapted properties. The Scottish Government must continue to invest in new social and affordable homes, taking into account housing need at a local level, not just national targets.

Supported housing options - while the vast majority of households want to stay in their own home and are able to maintain their own tenancy (with support where required) there are a small number of households for whom mainstream accommodation is not suitable. More work must be done to understand supported housing needs at a local level with capital investment provided to develop alternative housing options where required.

Improving access to the PRS - many local authorities think that use of the PRS needs to be expanded to achieve RRTP ambitions. However, affordability and lack of security are key barriers to accessing the PRS. This is a particular issue for single people under the age of 35 who are subject to the Shared Accommodation Rate. The Scottish Government should consider making use of its social security powers to 'top up' support for housing costs in the PRS and it should also review security of tenure. Landlords and tenants need access to better advice and support.

Healthcare and support needs - while most respondents were positive about access to healthcare and support, some gaps in provision were identified. Lack of mental health support was repeatedly mentioned as a significant issue. Health and social care services must invest in treatments and services to prevent the need for more costly crisis intervention at a later date.

Preventing homelessness - there is a need to formalise the role of partners in addressing homelessness and the proposal to introduce a prevention duty for public bodies is welcome. However, there are concerns about the extent to which other bodies would comply and how the proposals fit with existing statutory requirements for local authorities (e.g. avoiding gatekeeping). The Scottish Government must work closely with the housing sector when developing further plans for a prevention duty to ensure successful implementation.

#### **Detailed findings**

#### **General observations**

There is a clear need for a longer term approach to tackling homelessness in Scotland. In order to be successful, this must be underpinned by sufficient, multi-year funding and support from key partners, particularly health and social care.

"In order to ensure that we have the commitment to deliver the ambitions of ending homelessness, a whole systems approach is required where early intervention is paramount to ensure that any individual in our community is supported to prevent a crisis. Housing services cannot achieve this alone."

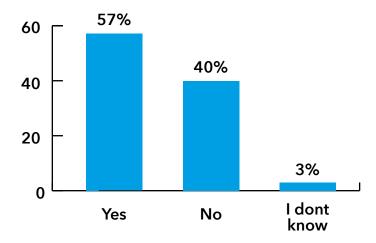
Progress with RRTPs and the impact of the pandemic vary across the country and solutions will need to be tailored to specific local circumstances. While some local authorities reported a reduction in homeless presentations, there are significant issues with temporary accommodation backlogs across the country, including an increasing reliance on B&B accommodation despite efforts to reduce this in line with RRTP ambitions and the extension of the Unsuitable Accommodation Order (UAO).

Access to appropriate, affordable housing options in the social and private sector remains a key concern and barrier to moving households out of temporary accommodation. It is not yet clear what the longer term impact of the pandemic may be in terms of increased evictions when restrictions are lifted, long term economic uncertainty for low income households and changing expectations around indoor and outdoor space for working, studying and socialising.

### Progress on RRTPs and the impact of the pandemic

We asked local authorities whether the implementation of RRTPs was having the desired effect of transforming services and speeding up the process of rehousing homeless households.

Is the implementation of RRTPs having the desired effect of speeding up the process of rehousing homeless households?



Over half of respondents reported making good progress with RRTPs, including reduced waiting time for permanent accommodation, reducing the use of B&B accommodation and reducing the backlog of open homelessness cases before the pandemic hit. The RRTP process was also praised for focusing local authority attention on addressing a range of issues in a short space of time and prompting conversations and joint working with partners such as Health and Social Care, RSLs and third sector organisations.

"[the RRTP] process was helpful in taking a step back and considering need and demand across the authority. With no barriers, particularly funding, how would we do things differently? That prompted conversations across partnerships on what we can do together and there have been areas of progress, despite the impact of Covid."

However, many described experiencing significant challenges as a result of the pandemic including:

- Increased time spent in temporary accommodation.
- Longer void processing time.
- Lower turnover of stock.
- Changing aspirations of households e.g. only considering a home with a garden or requiring more indoor space due to working from home.

There is some optimism about gaining lost ground with actions including:

- Plans to review the percentage of lets being made to homeless households.
- Exploring the use of homes in the private rented sector (PRS).
- Strengthening established partnerships (NHS, social work and the third sector) to support homeless households, including plans to expand Housing First.
- Plans to review prevention activities.
- Targeted flipping of temporary accommodation to permanent accommodation.

Outwith the pandemic, restrictions and challenges mentioned included:

- Lack of affordable housing options and mismatch between available supply and needs of households. Several local authorities specifically mentioned lack of one bedroom homes.
- Economic environment and impact on affordability for some households.
- Rapid rehousing is a policy aim and not a statutory duty and can conflict with local authorities' legal obligations. For example, one of the aims of the RRTP is to reduce the use of temporary accommodation. However, in order to meet extended Unsuitable Accommodation Order (UAO) requirements, some local authorities have needed to extend the use of mainstream housing stock as temporary accommodation thus reducing options for permanent accommodation.

One respondent mentioned that while progress has been made with speeding up allocations, it would be difficult to attribute this to the RRTP as other changes were made at the same time including a greater focus on prevention and housing options and changes to the letting system.

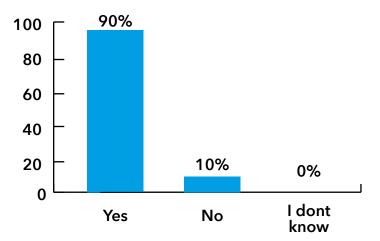
#### Recommendations

The Scottish Government should work with local authorities through the Homelessness Prevention and Strategy Group (HSPG) and RRTP working group to develop a more formal framework for monitoring progress and performance. This should build upon existing reporting mechanisms and help to measure success and identify where changes in approach or further resources are required.

The ability to gather data on performance improvements and demonstrate value for money would be beneficial in securing long term funding from partners ssuch as Integration Joint Boards (IJBs) beyond the lifetime of RRTPs.

The vast majority of local authorities (90 percent) reported that the pandemic has affected the use of temporary accommodation in their area, including in areas where homeless presentations have actually reduced.

Has the pandemic affected the use of temporary accommodation in your area? For example, have you had to make use of types of accommodation that would not usually have been used or have people had to stay in temporary accommodation for longer than usual?



In some areas, progress made before the pandemic such as reduced waiting time and move away from hostel and B&B accommodation has gone into reverse.

"While the number of homeless applications reduced significantly in our area, the proportion of those presenting in a crisis that required temporary accommodation increased. This, alongside the restrictions during the first lockdown and impact on void repairs, utilities change overs, furnishing and removals services and allocations, put significant pressure on the availability of temporary accommodation."

A significant issue has been the reduction in available lets, increased time taken to carry out work or repairs, establish utilities and organise furnishings and removals. This has led to increases in the numbers of households in temporary accommodation and length of stay. In some areas this has led to increased reliance on B&B accommodation, use of shared spaces and the PRS.

One local authority reported an increase in dissatisfaction due to having to use accommodation that would otherwise not have been considered, including hotels and low demand properties.

Others report meeting increased demand from within their own stock, including increasing the portfolio of homes by purchasing from the open market. Changes in the housing market have reduced housing options for some who may otherwise not have needed support from the council e.g. high demand and limited supply means that developers can specify cash buyers only and some households are facing more difficulties accessing the PRS.

However, the majority of respondents also reported some positive outcomes.

#### Lessons from the pandemic

79 percent of respondents reported that some positive changes have been made as a result of the pandemic including:

- Better partnership working with health care and criminal justice sectors.
- Better partnership working with RSLs with some providing stock for temporary accommodation and more RSL lets to homeless households.
- Better partnership working with the third sector e.g. addressing food insecurity.
- Developing new services such as Rapid Resettlement and Private Sector Leasing.
- Positive response from private landlords.
- Highlighting the dedication of staff members.
- Prioritising mainstream allocations to longterm homeless applicants.
- More flexibility to convert temporary accommodation into permanent tenancies.
- Sharing practice with other local authorities through Housing Options Hubs.

#### **Funding issues**

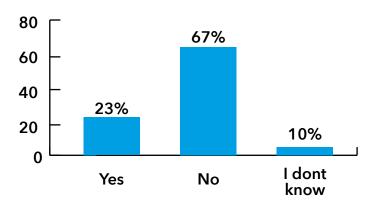
Under a quarter of respondents indicated that RRTP funding had been adequate in their area. Positive experiences included funding being used as a catalyst for change and better support being provided for homeless households in the area. One respondent indicated that changes to service delivery supported through RRTP funding have helped to free up funding elsewhere.

However, the majority of respondents (67 percent) reported significant shortfalls in funding allocated for RRTPs to date and pointed out that more funding will be needed to recover from the pandemic. Particular issues highlighted included:

 There is no capital funding available through RRTPs to address the fundamental issue of lack of affordable housing - RRTPs should be better aligned with Strategic Housing Investment Plans (SHIPs) and the Affordable Housing Supply Programme (AHSP).

- There is also an issue with funding for alternative temporary accommodation, such as rapid access housing as described in Unsuitable Accommodation Order (UAO) guidance, which cannot be funded through the AHSP.
- Funding awards for RRTPs based on the number of homeless presentations do not take into account local circumstances such as slow stock turnover, waiting times etc. Areas with a low number of homeless households therefore do not receive enough funding to make any radical changes.
- Additional funding has not been made available to address other changes in legislation such as the extension of the UAO which impacts on RRTP delivery.

Has the funding awarded to your area been enough to implement the changes set out in your RRTP?



Several local authorities mentioned having to review or scale back RRTP ambitions in line with available funding with one respondent reporting having to scale back their planned Housing First project by 50 percent due to funding restrictions. Several others mentioned funding as a barrier to establishing or scaling up Housing First despite having identified a need for the service.

"This [Housing First] is making a substantial contribution to meeting the needs of a relatively small group of households with the most complex needs. While we are in the process of 'scaling up' we continue to do so cautiously given the long-term cost implications of this type of support. Until we have a clear idea of funding in the longer-term it is not possible to expand to meet the volume of needs we actually see locally."

Some indicated that while funding levels are currently adequate, they may not be in the future as a result of the pandemic:

- RRTP funding estimates were based on assumptions that savings would be achieved through review of supported homelessness accommodation and reduction in temporary accommodation but the pandemic has resulted in greater use of temporary accommodation with associated costs.
- The impact of the pandemic has not yet been fully realised and may result in increased homelessness when eviction restrictions are lifted.
- Some planned activities have been put on hold due to the pandemic so financial shortfalls are not yet apparent but will likely affect future plans.

"So far we haven't seen how significant the shortfall will be as projects on prevention, housing advice and options, redesign of our temporary and supported accommodation, and working closer with the private rented sector have all been delayed due to the pandemic and the increase in presentations to homelessness and also the restructure of staff and services to compliment the transformation of Housing Access and Homelessness services."

Outwith the scope of RRTP funding, one respondent mentioned the need for fundamental reform of housing benefit in order to redistribute funding from communal living environments to support people in community settings.

We also asked if local authorities had experienced issues with the Ending Homelessness Together funding not being ringfenced. The majority of local authorities have not experienced any issues with this arrangement and several comments suggested that internal agreements within the council basically amounted to locally agreed ringfencing.

However, some local authorities did indicate issues with funding not being ringfenced. Several stated that while they have come to internal agreements that funding allocations should be used for RRTP delivery, having to negotiate budgets can take time and ringfencing funds would remove the risk of money being diverted in future to meet other priorities. Seven local authorities specifically called for the funding to be ringfenced.

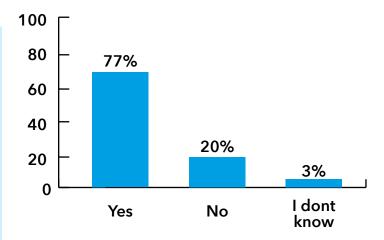
The vast majority of respondents (77 percent) indicated that the short term nature of Ending Homelessness Together funding (and sometimes additional funding being made available at short notice) has had a negative impact in their area.

"The annual schedule has made planning more difficult particularly thinking of commissioning services given procurement process can add fairly significant time and recruiting/retaining temp staff delaying projects and making annual review more complicated with delayed start and repeat vacancy issues (with temp staff frequently moving onto permanent or longer term temp posts). It may also be better value for money if we could procure services on a longer-term basis."

Issues identified in the comments included:

- Planning, procurement and recruitment can be lengthy processes and some reported difficulties spending within the allocated year. However, some also noted that slippage has been allowed to be carried forward which has been helpful but is not guaranteed.
- Several raised issues with staff recruitment and retention. Having to issue temporary or short-term contracts creates uncertainty for staff and can lead to increased turnover as staff find permanent work resulting in more time lost going through multiple recruitment cycles. Some also have difficulty attracting suitable or experienced staff for short contracts.
- One respondent mentioned only being able to appoint a dedicated member of staff for two years rather than the remaining three year RRTP period because of funding uncertainty.
- The funding model has led to a more cautious approach to service redesign and limited expansion of services such as Housing First.
- Third sector organisations that are commissioned to provide support often require contracts beyond a single year.
- It has been difficult to assess the impact of service changes as long term initiatives cannot be planned.

Funding has been issued on an annual basis, sometimes with short notice. Has this impacted your ability to plan services and/or assess the effectiveness of services?



"We received a very small amount of funding initially which was too low to allow any realistic delivery of the RRTP. Some additional funding was awarded at Christmas, the timing being towards the end of the financial year, introduced its own challenges."

Half of local authorities reported receiving additional funding from a range of sources including Alcohol and Drugs Partnerships (ADPs), IJBs, third sector organisations, Community Justice Partnerships or other council funds (HRA and general fund).

While the funding from other sources was very welcome and helped to support the implementation of RRTPs, it was unclear whether funding would be available in future years, creating uncertainty.

Some reported that requests for funding from partners had been refused or amounts received have been helpful but not enough to make significant changes.

One respondent mentioned that NHS staff resource had been made available to support a Housing First project, but this was not a dedicated resource with the staff remaining employees of the NHS and continuing to work in their NHS role alongside contributions to Housing First. Another noted that while funding had not been provided through the ADP, they had helped in other ways such as providing quick access to services.

One local authority stated that more funding would be needed for Housing First to meet all identified need. Ending Homelessness Together funding has been useful but Housing First cannot be scaled up until mainstream funding solutions are identified.

#### Recommendations

Long term, multi-year funding is required to make the kind of transformative changes outlined in RRTPs and in order to meet the Scottish Government's ambition to end homelessness. Future funding should be made available in three to five year cycles.

If the Scottish Government will not guarantee funding over multiple years, planning assumptions, such as those provided to local authorities through the AHSP, could be helpful.

The way in which funding allocations are calculated should be reviewed.
Simply basing awards on the number of homeless presentations does not take local circumstances into account and does not support transformational change in areas with lower levels of homelessness.

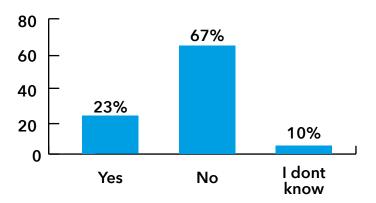
Housing First services cannot be introduced or expanded without long term funding in place and guaranteed access to unconditional support for as long as required.

## Timescales for addressing homelessness and the importance of partnership working

While the five year timescale for RRTPs has acted as a catalyst for change and focussed resources to support this, the majority of local authorities would like to see a longer term commitment backed by funding and linked to other national priorities. Many also stated that even if RRTPs had been on track, the pandemic has had a significant impact through delaying planned projects and/or creating a backlog of homelessness cases to deal with. The full impact and subsequent delays are not yet known.

"Had we not encountered the pandemic the situation may have slightly improved but, the desired results might still not have been achieved as a lot of local authorities required to make significant changes to their allocations policies and their procedures which all take time to develop and embed."

Is a five year transition plan realistic? If not, do you think we need to look at a longer term vision for tackling homelessness?



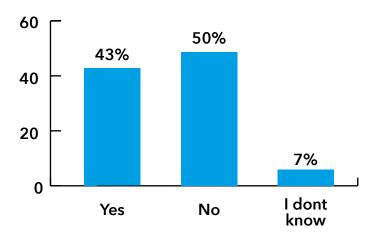
There was recognition that challenges vary significantly across Scotland and local authorities are working within very different local contexts. One local authority described issues with the complexity of their temporary accommodation portfolio and lack of clarity around definitions – for example, accommodation classed as 'hostel accommodation' not meeting the Scottish Government definition. If being asked to move away from using particular types of provision, local authorities need clear definitions and guidance.

The success of RRTPs depends on having the right supply of homes to meet needs and many will rely on the cooperation of RSLs and the PRS and on homeless households being willing to accept these options. There is a need to balance suitability with speed to ensure sustainability.

"In terms of moving people quickly into settled accommodation, we must also take into account applicants' aspirations and existing support networks. Immediately available properties do not always match our applicants' choices and as such consideration must also be given to the sustainability of a potential let, otherwise we risk reversing our recent improvements in reducing repeat homelessness."

Relationships between housing and health and social care partners is patchy and varies between local authorities. Half of all respondents do not think that the IJB in their area gives enough priority to the implementation of the RRTP.

Do you think the implementation of RRTPs has been given enough priority from the Integration Joint board in your area?



There was recognition that IJBs have other priorities to focus on, especially given the pandemic but it was suggested that homelessness was still very much seen as a housing issue.

One local authority reported that a strategic planning group has been established with representation from different departments but attendance is not consistent. Several reported support from staff at a senior level and good working relationships between operational staff, although in many cases financial support was still lacking. In many areas, progress has been made with joint working and it is hoped that this can be developed further.

Some respondents thought that more should have been done by the Scottish Government and Ministers to raise awareness and communicate the importance of RRTPs to the health sector and highlight shared priorities. One respondent felt that the role of IJBs in delivering RRTPs needs to be more formally established.

"Our RRTP is fundamental to the ongoing conversations surrounding the Housing Contribution Statement and we have good communication and dialogue. That said, although there is clear support, time and resources dedicated to the RRTP from the IJB is limited. This is something that needs to be developed further to ensure that for the future the commitment to early intervention and rapid rehousing is paramount."

A nationally led whole systems approach is needed to embed real change and secure buy in from partners such as health and social care. Local authorities can enact changes over a relatively short period of time (for example, introducing Housing First, establishing social letting agencies, employing more staff or increasing allocations to homeless households) but ensuring that these services are sustainable will require culture change which will take much longer, particularly among partner organisations.

#### Recommendations

While the RRTPs have provided a welcome catalyst for change, they only represent the first phase of work. The Scottish Government must take a longer term view to tackling homelessness with at least a ten year plan for whole system transformation including more formal roles for key partners such as health and social care.

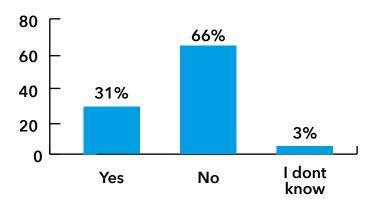
It must be recognised that homelessness is not just a housing issue and stronger leadership is required on this point is required at national and local level.

Consideration should be given to formalising the role of IJBs in delivering RRTPs and the proposal to introduce a prevention duty may be helpful in this respect.

#### **Housing options**

Only one third of local authorities think that they already have the right mix of housing options to meet needs in their area. The pandemic has increased pressure on housing services, forcing some to use unsuitable temporary accommodation such as B&Bs but there are longer term issues including lack of affordable housing supply and barriers to accessing other options such as the PRS.

Do you think there is the right mix of housing options to meet the needs of different households in your area?



Several local authorities mentioned a mismatch between supply and demand, particularly in areas with low stock turnover and particularly a lack of one bedroom homes. This, along with the shared accommodation rate in the PRS means that there is a lack of options for young single people. Respondents also noted a lack of homes for larger families and adapted homes.

A lack of supported accommodation was mentioned, with several local authorities stating that there is a lack of provision for households who may not be able to sustain a tenancy in the community. While there are only a small number of households in this situation, some needs are not currently being met. Lack of mental health support and support for people with learning difficulties were specifically mentioned.

"Housing Options for households who are unable to sustain permanent housing (those with needs greater than Housing First) need to be developed in partnership with the Health and Social Care Partnership. In the main these are households with complex behavioural and/or mental health issues for whom there is no appropriate model of accommodation available."

At the other end of the spectrum, there is a gap in provision for people with support needs but not complex enough for Housing First referral. Again, mental health needs were specifically mentioned. In smaller or rural areas it can be difficult to deal with households with very specific needs that are not often encountered. Low stock turnover and lack of funding were identified as issues.

#### Recommendations

A more robust assessment of needs at a local level is required to better understand and meet a wide range of housing needs. More detailed mapping of needs should be used to inform delivery plans and funding allocations.

The Scottish Government must continue to invest in social and affordable homes with a focus on local housing needs, not just national targets. Where needs are identified, funding must also be made available for alternative housing options, such as supported housing.

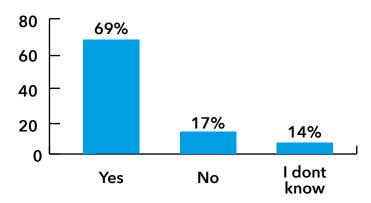
Greater support for local authorities to purchase properties on the open market would help to address supply issues quickly.

For some households, lack of support and mental health provision is a barrier to successfully sustaining a tenancy. This must be addressed alongside the supply issue. Access to healthcare and support is explored in more detail below.

#### Barriers to accessing the private rented sector

The PRS has contributed to RRTPs in the majority of local authority areas. Nearly 70 percent of respondents think that the use of PRS should be scaled up and that this could increase options for homeless households and potentially reduce waiting times. However, the PRS can only be used where this is an affordable option and costs vary significantly across the country.

# Do you think the use of PRS properties should be scaled up?



Several respondents pointed out the need for financial assistance to support households into the PRS such as help with a deposit but in many areas, the monthly cost of renting is a significant barrier and is not being adequately addressed through the benefit system. The PRS is not currently an option for single people under the age of 35 claiming Universal Credit as they are subject to the Shared Accommodation Rate.

A few respondents reported that they did not plan to make use of the PRS at this time, with one suggesting the need for further reform to enhance protections for tenants. Other barriers to the PRS being a viable option include:

- Negative perception from potential tenants.
- Lack of availability.
- Reluctance of private landlords.

"The PRS offers considerable benefits to households experiencing or threatened with homelessness, including improving choice and supporting access to desirable areas. Despite this we also need to recognise the barriers that homeless households face in accessing accommodation, not least of which being the demographics of this group. Single people under the age of 35 make up a considerable proportion of households applying for assistance under homelessness legislation, yet are only able to access the 'single room'/ shared accommodation rate making the PRS unaffordable for many.

"In addition to these issues, homeless households can experience stigma and discrimination, as well as finding it more difficult to meet the sector's entry requirements - i.e. credit checks and deposits. We continue to see a high number of homeless households who do not wish to consider the PRS as an option as they still see this as less secure than a social rented tenancy."

Actions being taken by local authorities to support access to the PRS include:

- Rent deposit schemes, rent in advance and rent guarantee.
- Grant funding to help sustain tenancies.
- Grants for homeowners to bring empty properties back into use specifically for homeless households.
- Increasing staff resources to support private landlords and tenants.
- Creating a 'private renting toolkit' with information to support private landlords and tenants.
- Setting up a social letting agency.
- Using PRS for temporary accommodation through Private Sector Leasing (PSL).

A couple of respondents mentioned the need to increase security in the PRS and one suggested that legislation needs to be updated to allow for homelessness duty to be discharged in the PRS.

#### Recommendations

The Scottish Government should consider using its social security powers to 'top up' support with housing costs for private tenants.

Security of tenure and how this affects local authorities' ability to discharge homeless duties should be considered as part of the development of the new Rented Sector Strategy.

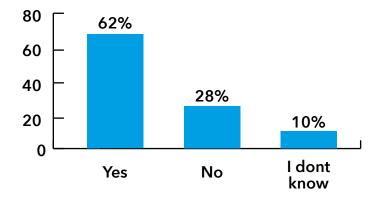
The PRS project carried out in Aberdeen and Angus with Crisis was highlighted as a good example of landlord engagement and learning should be shared. A key finding was that landlords wanted more information and a point of contact within the council who would be able to help with any issues during the tenancy.

More resources should be made available to provide advice and information to private landlords and tenants. This could include staff within local authorities (such as the Landlord Tenant Liaison service operated by Crisis for the City of Edinburgh Council) and also national resources such as a 'private renting toolkit' with information for landlords and tenants.

#### Access to healthcare and support

Most respondents (62 percent) are positive about access to healthcare and support, especially where partnership working has been established with Housing First or through local initiatives with examples including Community Link Workers located in GP surgeries or a dedicated Homelessness Nurse working as a link between housing and health services. One respondent also pointed out that the pandemic had created an opportunity to speed up service redesign and establish new partnerships.

### Are homeless households able to access the healthcare and support they need?



However, more needs done to build on these relationships and to speed up access to services. Several respondents specifically mentioned issues with access to mental health services. It was also noted that there are gaps in provision for people who need some support but not at the level of complexity that would require a Housing First intervention.

"We are making strong in roads into this with Health colleagues on the back of our Housing First project, however there is much to do to develop rapid access pathways for complex homeless cases in particular around mental health for cases which do not necessarily have the level of complexity that would result in a Housing First need."

Access to some services has been affected by the pandemic and there can be particular issues with access in rural areas.

There is a need for more prevention work from health and social care partners and a greater focus on early intervention. In some cases health services do not respond quickly enough to the needs of homeless people with complex needs as they are not seen as a priority. One respondent mentioned issues with 'conditionality' for accessing services. Examples included challenges registering with a GP or keeping a GP when moving to another area, inability to provide proof of address, not receiving letters as a result of moving home or having treatment cancelled for missing appointments.

One respondent identified a need to upscale Housing First support, particularly for young people with complex needs. It was stated that some homeless people can access services through self-directed support (SDS) but may

not choose to pay for those services. It was also pointed out that SDS services will not provide intensive outreach and may withdraw service if the client does not engage so may not be appropriate for people with complex needs. One respondent noted that lack of coordination between services and no identified 'lead' can result either in duplication of work or no one following up at all because of the assumption that someone else is doing it.

#### Recommendations

There is a need for the health sector to proactively support access to health services for people who are homeless or at risk of homelessness. The value of prevention work and cross sector benefits of implementing RRTPs should be highlighted.

There is a need for better co-ordination between housing, health and other services and for clarity on the different roles and responsibilities to ensure consistency of services and prevent unnecessary replication. Information sharing could also be improved.

The introduction of personal housing plans and support assessments (where these are not already being carried out) would be beneficial.

The comments about conditions being required to access health services are concerning and there is no legal requirement to provide proof of address in order to register with a GP. This message must be reinforced with healthcare providers and individuals.

#### Meeting the Unsuitable Accommodation Order

The pandemic has had a significant impact on progress towards meeting the extension of the Unsuitable Accommodation Order (UAO) and in some areas has led to increases in the use of hotel and B&B accommodation directly conflicting with the aims of RRTPs and the new UAO regulations.

"There are significant challenges ahead to meet the Order despite good progress made within the RRTP action plan. The supply and demand issues for [the Council] are the greatest challenge which have been exacerbated by COVID. Year-end supply was impacted by lockdown restrictions despite increased lets from both [the Council] and RSL partners. This has meant there are now a greater deal of open homeless cases awaiting a permanent outcome and higher numbers of households in B&B accommodation. Additional measures to increase supply have also been taken along with additional budget to mitigate some of the financial pressures. B&B use remains high despite work already done and projected impact of the new Allocations Policy, PRS team and PHP approach."

Some local authorities report that they are already meeting UAO and most seem confident that they can meet the requirements eventually. However, further extensions of the UAO exemptions may be required to avoid breaches.

One local authority reported that they are confident in meeting UAO regulations initially but there is some concern about the effect of removing local connection referrals. This local authority has already experienced an increase in households being advised to or choosing to present as homeless in the area as they know they will receive a better standard of accommodation than they would in an area where B&B use is more prominent.

Some local authorities are facing significantly greater challenges than others. Measures taken by local authorities to mitigate the impacts of the pandemic and meet UAO regulations include:

- Increased lets to homeless households from the council and RSLs.
- Increasing supply of homes for temporary accommodation and permanent tenancies.
- Making use of mainstream housing as temporary accommodation.
- Revision of allocations policies to rehouse homeless households more quickly.
- Review of temporary accommodation to identify and phase out use of unsuitable accommodation.
- Updating/refurbishing accommodation to ensure compliance with the UAO regulations.

Most respondents thought that the UAO Guidance was sufficient and helpful but there were a couple of suggestions for improvement:

- The Guidance is very lengthy it would be useful to have an appendix showing key criteria for meeting the UAO and different types of accommodation e.g. rapid access housing, shared tenancies and community hosting.
- The Guidance may be open to interpretation regarding what will meet needs opposed to expectations of need.

One local authority reported some issues with recording and use of HL1 and HL3 consistency.

#### Recommendations

Progress towards meeting UAO regulations and how other changes, such as the removal of local connection referrals, impact this should continue to be closely monitored.

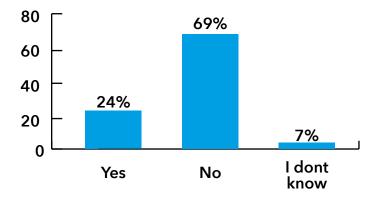
It is likely that further extensions to temporary UAO exemptions will be required to avoid breaches of the regulations. A small number of local authorities may need longer term plans to comply with regulations and the Scottish Government should work with them to find solutions.

Further clarity on accommodation types, how and when these can be used would be welcome.

#### **Preventing homelessness**

Only a quarter of respondents think that local authorities already have the tools and resources needed to prevent homelessness. Resources within housing and homelessness teams are stretched and more focus needs to be given to homelessness prevention as a long term strategy shared with partners across different departments and organisations, not just a housing issue.

### Do local authorities have adequate tools and resources to prevent homelessness?



"The majority of homeless presentations received by LAs are caused by a relationship breakdown of one type or another. If we are truly going to be able to prevent homelessness then there will need to be more of a focus from wider agencies around dealing with the preventable issues behind this. This type of approach would need to be embedded in the work of Health and Social Care Partnerships. It is not realistic to expect Housing and Homeless teams to deal with this on their own."

Some local authorities do report good progress being made towards homelessness prevention and steps taken include:

- Introduction of mediation services.
- Revised Section 11 guidance.
- Prevention pathways for high risk groups including victims of domestic abuse, care leavers and prison leavers.
- Establishment of a homelessness prevention review group across all agencies.

Several local authorities mentioned the ongoing development of the Housing Options Toolkit and that this will be useful once implemented. It will also be important to ensure that staff are given appropriate training.

One local authority mentioned the need for more person centred approach - not trying to fit people into existing services.

We also asked local authorities about their views on the proposal to introduce a statutory duty to prevent homelessness. All local authorities that responded to this question (23) support the proposal to introduce a prevention duty as long as this includes partners and is adequately resourced. Comments included:

- Homelessness is a complex area with many contributing factors, an effective monitoring system will be needed to ensure that all partners are aware of their role in prevention and are contributing in the right way.
- There is a need for clarity around when prevention work is appropriate or when a homelessness assessment is needed (to avoid suggestions of gatekeeping). The proposals as they stand would impact on local authorities' existing homelessness duties and could leave local authorities open to legal challenges.
- At a national level HL1 data could be used to identify drivers of homelessness and how it could have been prevented to assist in developing tools to address this.
- There is an opportunity for real culture change and move away from the assumption that homelessness is just a housing issue.
- Extending prevention work to six months might allow more effective prevention activity, however this would require additional funding to deal with increased demand.

#### Recommendations

The proposal to introduce a legal duty to prevent homelessness is welcome but the Scottish Government must work closely with the housing sector when developing further plans for a prevention duty to ensure successful implementation.

The role of other sectors must be clearly articulated to ensure compliance with any new duty and to ensure that all parties understand their role, and the roles of others, in supporting people at risk of homelessness.



To find out more about Rapid Rehousing Transition Plans, temporary accommodation and housing options: a survey of Scotland's local authorities or to discuss your additional requirements please contact:

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