

1. Background/HARSAG Discussions to Date

1.1 What's the problem? People sleeping rough do not access temporary or settled accommodation rapidly enough because of local challenges around housing supply, access, systems, quality of offer – or due to a perception of those factors, or combination. The following statements represent the HARSAGs starting position of shared understanding:

- People sleeping rough are highly likely to experience multiple forms of exclusion, trauma, morbidity and early mortality resulting from adverse life experiences significantly outside the 'normal' range of human experience.
- Those experiences are better met within Psychologically Informed Environments (PIE) and through Trauma Informed Care, both known to create the most conducive conditions for engaging and supporting people and for building trust and relationships.
- [Hard Edges](#): it is understood that better integrated policy and practices are required to adequately reflect the multiplicity of people's experiences, particularly in relation to homelessness, mental ill-health, substance misuse and offending.
- Housing Options is considered less successful in reach and approach for people sleeping rough and experiencing multiple forms of exclusion. There are very few people not engaged with public, third or independent sector services at all, although many will frequent and favour a service or sector over others.
- Better outcomes (housing sustainability, social, economic and health) are aligned with:
 - Rapid rehousing: minimum time spent in any form of temporary accommodation, with the fewer transitions the better;
 - The size of the congregate/shared unit - the smaller the better outcomes;
 - Mainstream tenancies rather than congregate units, with the right support.
- Responsibility for determining another person's 'housing readiness' while not a legal requirement is established practice in some areas. This should be removed from our homelessness response; there are very few adults not ready for their own home within a community, although flexible support to maintain it remains vitally important for some.
- The evidence is promising for community hosting models, especially for young people and where it can enhance an offer, not supplant better offers (e.g. mainstream tenancy with support where that is wanted and is available).
- The evidence supporting rapid rehousing models including Housing First is overwhelming. Therefore, we want to create a new mechanism to (i) significantly upscale and transition to Housing First as default for people sleeping rough and with complex needs; (ii) ensure rapid rehousing in the context of Scotland's homelessness

legislation for most other households; (iii) by exception, options for shared accommodation with quality support.

2. Summary of Evidence

- 2.1 This position is informed by summary of evidence presented by Professor Suzanne Fitzpatrick at the Action Group's first meeting in Oct 2017. It is also informed by the international evidence review of rough sleeping published in Dec 2017 (Dr Peter Mackie, Cardiff University, Professor Sarah Johnsen and Dr Jenny Wood, Heriot-Watt University).
- 2.2 The *Aye We Can* lived experience strand of the Action Group's work has also been a key reference point. In Nov 2017 the Action Group enabled the following principles to frame this work, which are based on the poverty and complex needs section of the *Solve UK Poverty* report published by the Joseph Rowntree Foundation in 2017:

Where homelessness has not been prevented, we want an urgent response that is:

- Local: the choice to be supported in your own home as part of a local community so that we can all live, work and use services in 'ordinary' not homeless places;
- Tailored: support that is flexible, immediate and available for as long as you need it;
- Respectful: respecting your ability to build your own life, supporting your strengths and ambitions;
- Realistic: helping you tackle any financial hardship that caused your housing situation.

3. Options Considered

- 3.1 The Action Group agreed 4 parts should be considered to determine recommendations that will contribute to ending rough sleeping by ensuring rapid access to accommodation:

PART A Housing Options

PART B Temporary & Emergency Accommodation

- (i) Temporary Furnished Flats
- (ii) Community Hosting
- (iii) Supported Accommodation
- (iv) B&B Accommodation
- (v) Hostels

PART C Permanent Accommodation & Housing Supply

- (i) Scottish Secure Tenancy
- (ii) Private Residential Tenancy/Assured Tenancy

Including secured via:

- Housing First
- Social Letting Agencies
- Rent Deposit Guarantee Schemes
- Choice Based Letting

PART D No Recourse to Public Funds

And the most vulnerable to destitution

Some of the above have been identified to be carried forward to the next phase and broader question of ending homelessness, and/or to be further developed by appointed consultant, reporting May 2018.

Part A | Housing Options

Housing Options could be more effective in reach and approach for people sleeping rough and experiencing multiple forms of exclusion.

Recommendations:

- **A1:** Integrate an outreach/off-site component within local housing options frameworks, proportionate to local need. While retaining statutory responsibility, local authorities should partner on this with third sector crisis response teams where relevant.
- **A2:** Adopt the principles of PIE and trauma informed care within Housing Options, local authority casework and other environments where access to accommodation is being sought. Commission a training programme combining the psychological, clinical and theoretical component with frontline and lived experience. Align module with the Housing Options Hubs Training Toolkit but ensure broader reach of training and capacity building for relevant third sector services within each locality.

Part B | Temporary & Emergency Accommodation

An independent specialist was commissioned by the Action Group in February 2018 to design a framework that can assist local authorities and partners to develop local implementation plans toward rapid rehousing in mainstream tenure as default, with proportionate supported/other housing for when this is not possible. With a final report due in May 2018, this consultation spans the current question (ending rough sleeping) and the next 2 phases of work (transforming temporary accommodation and ending homelessness in Scotland).

Recommendations:

- **B1:** Each local authority area to develop and cost a 5-year 'Rapid Rehousing Transition Plan' by December 2018, within the framework consulted on and published by the Action Group in June 2018. Ongoing support and monitoring should be taken forward by the Scottish Government's Homelessness Prevention and Strategy Group structure. *The key components of rapid rehousing transition plans are outlined at Appendix A.*
- **B2:** Temporary Furnished Flats represent the optimum option for people to live their lives as normally as possible while statutory assessments are concluded and rehousing into settled accommodation secured. This type of accommodation also enables couples and people with pets to stay together; a regular point of feedback from people with lived experience of homelessness. Local Rapid Rehousing Transition Plans **[B1]** should therefore prioritise this type and ease the option to flip the occupancy agreement/short Scottish Secure Tenancy to a Scottish Secure Tenancy, where that is the household's preference.

- **B3:** The evidence is promising for community hosting models, especially for young people and where it can enhance an offer, not supplant better offers (e.g. mainstream tenancy with support where that's what's wanted and is available). Scottish Government should support testing and, where appropriate, scaling of Community Hosting models to diversify the housing offer available to those experiencing or at risk of homelessness (*see full scoping paper led by Dr Beth Watts, Heriot-Watt University, at Appendix C*).

Part C | Permanent Accommodation & Housing Supply

Each local authority area has unique housing access and allocation systems, supply and demand pressures, temporary accommodation profiles, rough sleeping demographics and local networks of third sector homelessness services. *The consultant's project [B1] and temporary accommodation research will provide local systems analysis that will help expand recommendations for Qs 3/4.*

Recommendations:

- **Housing Supply:** Scottish Government has committed £3 billion to deliver at least 50,000 affordable homes by March 2021, of which 35,000 will be for social rent.
 - **C1:** Scottish Government should continue to ensure an adequate affordable and social housing supply to tackle immediate needs and then maintain supply. *This would be assisted by an agreed definition of affordable housing in the Scottish economic context.*
- **Housing Access:** the role of RSLs as partners in sharing the burden and enabling and supporting a positive solution for individuals has been carefully defined by Queens Cross Housing Association, consulting with other RSLs and the representative bodies SFHA and GWSF. The priority is to help applicants navigate the system as follows:
 - **C2:** The need for friendly support from 'receiving' housing professionals to help people through the process. *The Community Connectors or Instant Access Officer approach should be further developed in targeted areas;*
 - **C3:** Front loading the system to minimise the amount of time spent in temporary accommodation. *Scope further how RSLs can be enabled and funded to fast-track offers of housing to homeless households with access to wraparound support. Align with systems analysis [B1] and Housing First [C6-8] recommendations;*
- **Choice Based Letting** or bidding systems are generally unpopular with people using homelessness services and support providers ([Anna Evans Consultancy](#); 2015).
 - **C4:** Additional support, independent advice and advocacy should be factored as standard into online and choice based letting/bidding systems. This will serve to reduce or remove the practical, language or literacy barriers to self-selecting settled accommodation.
- **Social Letting Agencies:** with shortage of suitable RSL/local authority housing in many areas, the private rented sector can play a role in responding to homelessness. Since 2010 local authorities can discharge homelessness duty via a short/assured tenancy.

- **CS:** The role and capacity of Social Letting Agencies should be considered within Rapid Rehousing Transition Plans.
- **Housing First** needs special consideration as it has international evidence backing it to be the most successful intervention for people sleeping rough and with complex needs. It was also the core recommendation of the Scottish Parliament's cross-party [Local Government & Communities Report on Homelessness](#) which was published in February 2018. Housing First means rapidly rehousing multiply excluded people in a community as the first, rather than last step. It is simple, but radical because it significantly challenges established practice.

There are several key programmes and initiatives that can help this transition:

- (i) **Turning Point Scotland** as early adopters who brought the Housing First pilot to Glasgow in 2010. The first in Scotland and UK and the first internationally to target active drugs use. The independent evaluation of the Glasgow pilot confirmed significant successes in achieving stable housing outcomes and other clear gains. Currently providing over 40 HF tenancies in Glasgow, with projects also now in East Dunbartonshire and Renfrewshire. The peer support aspect has been a key success indicator there is support for having this integrated into a Scottish Housing First model.
- (ii) **Social Bite 600 Homes Campaign** will be the UK's largest Housing First programme. A minimum 600 units social housing pledged by Wheatley Group, EdIndex Partnership (City of Edinburgh Council and 19 RSLs) and Dundee City Council over an 18-month period from April 2018. Sleep in the Park fundraising enabled a planned £3m investment over 24 months in the Housing First wraparound support alongside each pledged tenancy, which will be managed by the Corra Foundation. A Programme Board has been established whose role will include collecting evidence of outcomes and public service savings, as well as designing the support structure. This campaign represents a significant catalyst for a national direction of travel and will expect a commitment of financial support from the Ending Homelessness Together Fund to ensure success is mainstreamed and tenancies sustained beyond the initial £3m/2-year Social Bite investment. For the potential scale of the project to be realised, there will be requirement for investment alongside Social Bite in the first 2 years from April 2018, and then further investment in the mainstreaming of funding for the wrap-around support alongside local government beyond year two.
- (iii) **Housing First Scotland** collaboration of GHN, Turning Point Scotland and Heriot-Watt University since 2016 to get behind the evidence and instigate scaling up. Scotland's first Housing First conference in May 2017 with second scheduled for May/June 2018. Provide training, speakers and an online repository for information, advice and opinion. Currently undertaking full cost-benefit analysis of Housing First in Scottish context.
- (iv) **Rock Trust Housing First for Youth** is a 2-year pilot recently launched which will place vulnerable young care leavers into permanent housing in West Lothian. Almond Housing Association have provided five permanent, fully furnished homes and the Rock Trust will provide high level support to each young resident. This will be the first time the Housing First model is deployed with a specific focus on young people in the UK.

- (v) **Homes for Good** and **Glasgow City Mission** are providing 25 homes in the private rented sector with fidelity to the Housing First model from January 2018, with potential risk to private property underwritten by **Simon Community Scotland**. This is simultaneously testing the comparability of Housing First outcomes in the private rented sector which will be evaluated by **GHN** via the Crisis Help to Rent programme.
- (vi) **Housing First Transition Fund** £3m raised by **GHN** and **Social Investment Scotland** from Big Society Capital, Joseph Rowntree Foundation, Esmee Fairbairn Foundation. Funds are in the form of 5-year revolving loan facilities for a Glasgow demonstration project to enable hostels to transition to Housing First. The programme provides capital and support to acquire scatter site housing and replace on a 1:2 ratio (2 social housing units for every single residential place) - bringing private stock into social use. BSC may increase investment for a national/UK roll-out if Glasgow pilot demonstrates viability.
- (vii) **Shelter Scotland** Housing First for Families service in partnership with South Lanarkshire Council incorporates core Housing First principles, including importance of a permanent home; self-directed support; shared ownership of support plans and peer support.
- (viii) **Crisis Housing First Feasibility Study** to test the feasibility of implementing Housing First at *scale* within the Liverpool City Region. The first study exploring a geographical scaling up, the key findings included that this will require: determined partnership working; the implementation of new models of service delivery and culture change.
- (ix) **Housing First England** hosted by Homeless Link to create and support a national movement of Housing First services. Provide training and publish useful resources and support materials. Currently working in partnership with Housing First Scotland to replicate some key materials in the Scottish legal and practice context.

Is Housing First Queue Jumping?

It has been suggested that Housing First could create 'queue jumping' or a two-tier system where people in the greatest need and with the most complex needs are prioritised for housing over others on a waiting list. Scotland is in a unique situation compared to other parts of the UK, in that almost all people who are unintentionally homeless have the right to settled accommodation. This universal right to housing means that Scotland is not faced with the same legislative concern or complication as other countries when considering scaling up Housing First. Within that universal right to housing, prioritisation based on need is already the default approach for when 'first-come, first served' doesn't adequately address the urgency of real-life circumstances. The Action Group's practical position is that it is not possible to tell someone sleeping rough that they are somehow not 'waiting' for housing or that they are not in the most urgent need for it. The very nature of the accumulative life experiences that led to many people's situation often means that seemingly simple processes of registering on waiting lists, maintaining contact with casework or housing offices or bidding for properties can overwhelm people. It is the Action Group's view that the most powerful intervention we can make is an offer of permanence, stability, housing and wraparound support.

Recommendations:

- **C6:** Scottish Ministers should announce a default to Housing First for people sleeping rough and experiencing multiple forms of exclusion. Include this expectation in a revised Scottish Government Code of Guidance on Homelessness.

How many people are we talking about?

I-SPHERE report commissioned by Social Bite provided estimates on the scale of severe and multiple disadvantage in Scotland's 4 largest cities, defined by 3 key aspects of homelessness, substance misuse and offending. 29% of homeless households in the four cities report also having issues with substance misuse and/or offending, a higher rate than in Scotland as a whole (23%). However, there is quite a wide difference between Edinburgh (15%) and Glasgow (38%) with Dundee and Aberdeen in an intermediate position (22%). Given its larger population, Glasgow dominates the four cities with 70% of the four-city total (3,750 out of 5,370 households). The official data on homeless applicants reporting rough sleeping in the three months preceding application indicates that a high proportion of this subgroup of homeless people in the four cities (40%, 750 cases per year) had a degree of complex need (SMD2+) while 6% (120) were affected by all three types of problem.

- **C7:** Appoint a national delivery group to steer and support the scaling up of Housing First in Scotland and to monitor the rapid rehousing transition plans being developed in local areas **[B1]**. This should seek to connect the wider initiatives outlined above and align as a sub-structure of the Scottish Government's Homelessness Prevention & Strategy Group. A 5-year timeline of Scotland's transition to a rapid rehousing response is at *Appendix B*.

The Action Group's approach has so far been to balance recommendations that seek to improve our response to homelessness in the longer term, with those that attend to the issues affecting people on the ground today. On that basis:

- **C8:** Create and resource additional capacity to drive Scotland's transition to rapid rehousing approaches, including Housing First. This will demonstrate national leadership and commitment, retain focus and priority, drive systems change and provide an advisory function for Housing Options Hubs and partners.

Balanced with current initiatives that have greatest potential to bridge the gap between today and the later date when system improvements resulting from local rapid rehousing transition plans emerge:

- a) The Social Bite programme is catalysing significant scaling up of Housing First in Scotland and shouldering early risks associated with systems change during 2018-20. The *Ending Homelessness Together Fund* should strategically partner this initiative, investing alongside it from April 2018 and supporting local authority mainstreaming from 2020.
- b) The Scottish Government *Ending Homelessness Together Fund* should create a financial partnership with the Housing First Transition Fund 2018-19 to ensure a national stake in

the Glasgow demonstration project is demonstrated and to consider from there the evaluation of the model and its applicability in other parts of Scotland from 2019-20.

Social Investment as a mechanism to scale up Housing First

There is an exciting and current opportunity in Scotland to deploy social investment as a mechanism to scale up Housing First. Housing First has gained interest among social investment organisations who can provide significant capital (in the form of repayable, low % loans) for private housing stock to be brought back into social use. This can be done in the way that will be tested in Glasgow during 2018-19 (a transition from hostel > mainstream tenancy). And/or Scotland could establish a 'Housing First RSL' in targeted areas - using social investment to buy homes for social housing, with rental income repaying investment over agreed terms. Or indeed in some other way, for example a partnership with existing RSLs, or a coalition of RSLs in targeted areas across Scotland utilising social investment for scaling up Housing First. The consultant's toolkit (B1) will engage local areas in the applicability of this in their own housing context and the extent to which it could aid with local transition to rapid rehousing transition locally.

Part D | No Recourse to Public Funds

To help develop our response to this issue, the Action Group facilitated:

- A focus group with 6 people who are homeless and with no recourse to public funds on 5 February 2018 hosted by Glasgow Asylum Destitution Action Network.
- A roundtable discussion on 14 February 2018. Hosted by Positive Action in Housing with 17 participants from key frontline, policy and legal advocacy organisations on 14 February 2018. *Please see Appendix D for full discussion and list of participants.*

We acknowledged the importance of ensuring HRSAG recommendations don't replicate or contradict the anticipated content of the Scottish Government anti-destitution strategy as this development will have the greater texture and detail that people's health and well-being are depending upon.

However, there are identified priorities from the inquiry that are strongly considered as having the potential for the greatest immediate impact. These should be brought forward and resourced without delay alongside improvements to existing structures that would assist in their delivery.

Recommendations:

- **D1:** Funding for a preventative **Independent Advocacy** service in key cities and covering both people destitute through the asylum process and those EEA nationals who are without recourse. This should be scaled and costed proportionately.

- **D2:** A cross-sector anti-destitution **Strategic Alliance** should be established, and infrastructure supported. This should bring together the public and third sectors working especially on asylum and immigration, housing, local government and health.
- **D3:** Evidence is already available supporting the effectiveness of **Community Hosting** as a temporary accommodation solution in this context (e.g. PAIH Room for a Refugee). Extending this model should be progressed and resourced alongside the geographically targeted community hosting pilots as recommended by HARSAG.
- **D4: Urgent investigation** should be instructed by Scottish Ministers on the experiences of people resident in Home Office 'asylum accommodation' currently managed under public contract by Serco. Findings should be presented to the Home Office to inform the 2019-2029 accommodation contracts and aim to achieve better alignment with Scotland's legislative and policy context. This investigation should focus on people's sense of safety and security and explore the potential for Scottish regulatory or best practice standards for asylum dispersal and accommodation.

Rapid Rehousing Transition Plans (RRTPs)

Each local authority area will develop and cost a 5-year 'Rapid Rehousing Transition Plan' by December 2018. This plan will represent the core catalyst funding intended by the Scottish Government's Ending Homelessness Together Fund for LAs/RSLs to initiate and lead whole systems change in their area from 2019-2020.

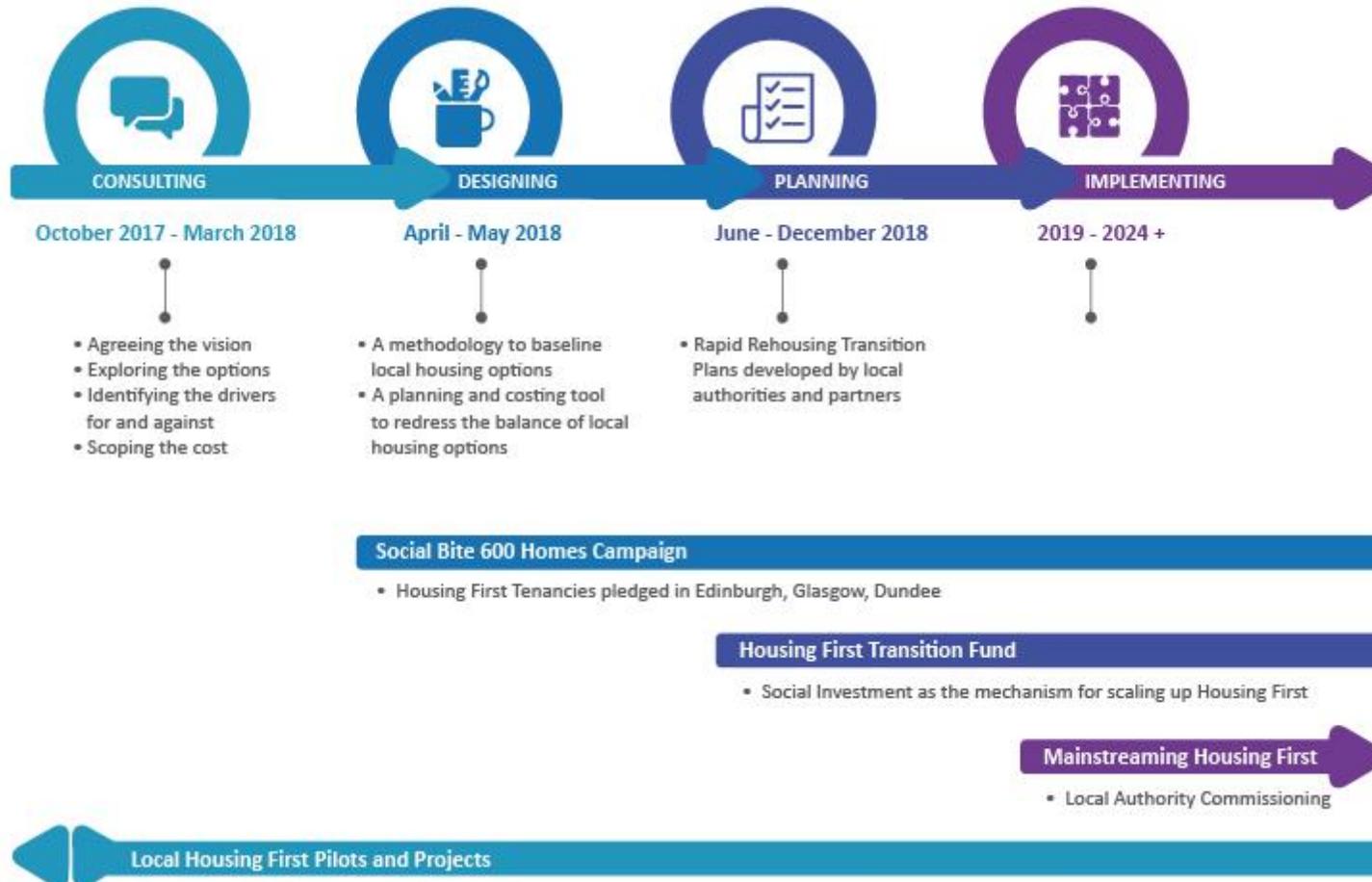
RRTPs will set out local action and costings to (i) significantly upscale and transition to Housing First as default for people sleeping rough; (ii) ensure rapid rehousing in the context of Scotland's homelessness legislation for most other households; and (iii) by exception, options for shared accommodation. The overall aim is to hasten, simplify and declutter the homelessness system from the perspective of people experiencing it.

A framework to assist the design of local plans will be consulted on by Indigo House Group on behalf of the Action Group during Feb-May 2018. This will include a methodology for conducting local baselines and a toolkit for developing and costing a local plan. It will advise on overlap with local authority's existing Housing Needs and Demand Analysis and Strategic Housing Investment Plans.

The published framework will ensure rapid rehousing transition plans give due regard to several components, likely to include:

- Integrating an outreach/off-site aspect to local housing options approaches (A1)
- Capacity planning to scale up Housing First for people sleeping rough and/or with complex needs (C6-9)
- Rebalancing temporary accommodation toward Temporary Furnished Flats within a community (B2) and away from B&B and hostel-type accommodation
- Flipping temporary flats to a Scottish Secure Tenancy, where this has the consent of the household (B2)
- Planning for safe transition away from night shelter style provision
- RSL partnerships, including community connector initiatives to help people resettle after a period of homelessness and to enable direct access to Housing First initiatives (C2-3). Local need should be quantified in tandem and costed as part of the RRTP.
- Ensuring there is independent advice and advocacy freely available for people in areas where there is Choice Based Letting/Bidding Schemes for social/council housing (C4)
- Consideration on the role or potential role and capacity of Social Letting Agents (C5)
- Consideration on the role and capacity of Rent Deposit/Help to Rent Schemes

APPENDIX B: TIMELINE - Scotland's Transition to a Rapid Rehousing Response to Homelessness



Recommendations from the Community Hosting Working Group (February 2018)

This Working Group¹ was established to consider the role of ‘community hosting’ in meeting the aims of the Homelessness and Rough Sleeping Action Group (HARSAG).

Community hosting models

There are a variety of community hosting models – namely, Nightstop, Supported Lodgings and Shared Lives Plus – each focusing on different (sometimes overlapping) target groups, with differences in how they operate and are funded:

- **Nightstop services** offer emergency accommodation (from one night up to several weeks) to 16-25-year olds experiencing or at risk of homelessness in the homes of volunteer private households. A small but growing number of services currently operate in Scotland: the Edinburgh service has recently extended its capacity; a West Lothian service opened in 2017 and Glasgow service in January 2018; and local partners are exploring establishing Nightstop in Aberdeen. Twenty-eight further Nightstop services operate elsewhere in the UK, and two of these also cater for those over 25.
- **Supported Lodgings (SL)** or Supported Carers schemes offer longer-term supported accommodation for young people in the homes of private households who receive a rental/support income as self-employed providers. They are often used for those leaving care in England and Scotland. In England SL schemes are used in some areas to accommodate the wider youth homeless population, but this is not the case in Scotland.
- **Shared Lives** schemes cater for a wide variety of age groups, tending to focus on higher levels of need (from mental health issues and learning disabilities, to physical disabilities and health needs), and can involve day care, respite, medium term (transitional) placements or very long-term (up to several decades) arrangements. They also work in some cases with lower need groups (e.g. victims of domestic violence, young people in transition) and there are a small number of case studies of Shared Lives addressing the needs of people experiencing or at risk of homelessness with complex needs.

In addition to these types of schemes, community hosting models are increasingly being used to accommodate migrant groups with no recourse to public funds. Glasgow City Council have such a scheme catering, where appropriate, for unaccompanied minors and Positive Action in Housing runs a ‘host a refugee’ project in Glasgow helping those evicted from asylum accommodation.

The role of community hosting

Taken together, these models offer a spectrum of community hosting provision that sees placements in ‘normal’ homes as an appropriate, desirable and effective housing option for some groups of people experiencing or at risk of homelessness. Their effectiveness is supported by a promising emerging evidence base. A table giving more detail on each approach can be found in Appendix 1.

This family of approaches have a role to play in meeting the second, third and fourth aims of HRSAG, namely: eradicating rough sleeping for good; transforming temporary accommodation; and ending homelessness in Scotland. Furthermore, they reflect the evidence-informed principles adopted by the Action Group:

- **Local:** community hosting models provide temporary, supported or longer-term accommodation in ‘ordinary’ homes rather than institutional settings, and have particular benefits in tackling isolation and (re)integrating people with experience of homelessness into normal community and social networks;

¹ Beth Watts, I-SPHERE, Heriot Watt University (Chair); Jacqui Thompson, Barnardos; Kate Polson, Rock Trust; Ben Hall, Shared Lives Plus; Nicola Harwood, Depaul UK; Hazel Bartels/Catriona MacKean, Scottish Government; Lorraine McGrath, Simon Scotland; Ian Forster, De Paul/Nightstop; Catherine Francis, Shelter; Alana Nabulsi, Aberdeen City Council; Josh Littlejohn, Social Bite

- **Tailored:** they offer flexible and personalised accommodation and support, both on an emergency or short-term basis (Nightstop/Supported Lodgings) or on a longer-term basis (Supported Lodgings/Shared Lives Plus) as needed;
- **Respectful:** they can enable people to build their own life; support them to develop their strengths and pursue their ambitions; extend the choice of accommodation options open to those at point of need (short term); and widen the range of longer term housing options;
- **Realistic:** by minimising building and infrastructure costs compared to other accommodation models, and drawing on community assets as well as formal supports, community hosting schemes can provide a sustainable and affordable accommodation option.

Community hosting options complement to the housing-led response to homelessness being pursued by the Action Group, providing temporary accommodation or longer-term homes for those at risk or experiencing homelessness in the community and out of institutional and congregate environments. Specifically, a continuum of community hosting provision can offer:

1. **Homelessness prevention:** Nightstop services record a 70-80% successful move on rate², and can provide respite for struggling families allowing for mediation work to take place and return home (where appropriate) or other suitable accommodation option to be put in place during at Nightstop stay rather than at point of crisis. Supported Lodgings and Shared Lives can give people the space to develop life skills in a normal home environment, potentially reducing risk of future homelessness compared to less home-like environments.
2. **Emergency/temporary accommodation:** community hosting models can offer a swift access alternative to unsuitable emergency/temporary accommodation (Bed and Breakfast, all age hostel accommodation and congregate models). With a diverse pool of hosts, these models can cater for groups with low to high support needs and may be adaptable for adults as well as young people. Nightstop schemes can be used as 'breathing space' to enable a more appropriate temporary accommodation option to be found, including allowing time to organise a Supported Lodgings placement.
3. **Supported accommodation:** community hosting models (SL and Shared Lives) can offer supported accommodation (short or longer term) in the community and catering for a range of levels and kinds of support needs.
4. **Long-term accommodation for adults with complex needs:** the working group are particularly interested in the potential of community hosting models (particularly Shared Lives) to cater for the small group of homeless adults with complex needs for whom Housing First provision has not worked or who do not wish to live alone/in their own tenancy.
5. **Accommodation for those with those with No Recourse to Public Funds:** community-hosting models provide one means of providing accommodation for migrant groups with no access to public funds, while their immigration status is being settled/appealed or while arrangements to return to their country of origin are made.
6. **Rural/urban options:** because community hosting models use community resources by providing accommodation in private household's homes, it may be a particularly valuable model in providing housing options in rural or isolated areas, and in other areas and neighbourhoods not usually accessible to those with experience of homelessness or on a low income.
7. **Extended choice:** community hosting models can extend the choice of accommodation options open to those at risk of or experiencing homelessness.

² Service level data provided by Nightstop NE and SASH who provide Nightstop in Yorkshire.

8. **Better outcomes:** an emerging evidence base suggests that community hosting models can be associated with better outcomes in relation to move on, placement failure rates, education, employment and training outcomes, health, social integration and wellbeing than alternative forms of provision, and are viewed positively by both young people and hosts/providers.³

The working group are particularly interested in the possibility of developing the full range of community hosting models in a local area, and the gains this could accrue in terms of programme **efficiency** (staffing, training and support costs) and **flexibility** (by building a diverse base of 'hosts' in a range of areas, with different skills and willing to accommodate guests in the short, medium and long-term). Depaul already have examples of joint Nightstop/SL projects providing some initial learning on how the models can be managed alongside each other.

The Vision

Develop, scale and test the spectrum of community hosting models in Scotland to provide short, medium and long term housing options for those at risk of or experiencing homelessness, used in particular to (1) divert people away from unsuitable temporary accommodation (2) provide accommodation in 'ordinary' home settings (3) provide a platform to reintegration into mainstream community, social, educational and employment networks and opportunities and (3) provide a platform for effective homelessness prevention and personalised, flexible support.

Context

The group note the following context in Scotland relevant to the development and scaling of community hosting models:

- There are legal barriers to the scalability of community hosting models as a response to homelessness: it is unlikely that securing a Supported Lodgings or Shared Lives placement for a statutorily homeless household will constitute a discharge of duty under current homelessness legislation. HARSAG's legal reform work stream may wish to consider this.
- While social work teams in Scotland are familiar with SL and Shared Lives schemes and some operate or commission these kinds of services, local authority housing and homelessness teams have not adopted these models, potentially due to perceptions of risk, lack of awareness or implementation barriers;
- Funding for community hosting models comes from a variety of sources: LA social care and social work budgets; grant funding from non-statutory sources; care benefits; guest contributions; and housing benefit/local housing allowance (HB/LHA) (see appendix one). Schemes relying on HB/LHA can be complex to administer and depend on good working relationships with local Revenue and Benefits teams;
- Key to the success of any scheme is sustainable funding of infrastructure costs;
- Post-2020 Supported Accommodation funding will change: this may offer an opportunity to mainstream community hosting models into funding frameworks and address the work-disincentive effects of funding youth homeless accommodation through housing benefit;
- Implications of funding changes for long-term (2 years plus) supported accommodation and temporary accommodation are also relevant;
- Specific funding challenges will be associated with community hosting models for those with no access to public funds;

³ See appendix one and Nightstop service data. A Social Return on Investment study of Nightstop is due to be published in February 2018.

- Social work teams have in some cases been reluctant to use Nightstop services given concerns over how they can effectively manage their statutory duties in a community hosted model, particularly in relation to their corporate parent responsibilities;
- Health and Social Care Partnerships may offer an opportunity to utilise or bring together housing/social care budgets to fund community hosted accommodation for those with higher levels of need;
- Community Hosting models may offer an employability opportunity for those with lived experience of homelessness;
- The role of peer support within such models should be considered;
- The evidence base on community hosting is positive but limited: enhancing this evidence is essential to this agenda.

Proposals to HARSAG

Based on these considerations, the Working Group propose that the following recommendations are made by HARSAG to Scottish Government:

- **Scottish Government and organisations working in this area to hold Community Hosting Event in 2018:** possibly linked to Housing Options Hub national annual event if timing appropriate (usually in December/November); target audience LA housing and homelessness teams and commissioners; Scottish Government endorsement of community hosting models would be pivotal first step in winning ‘hearts and minds’ on this issue and increasing knowledge in the sector about potential of such models to prevent and effectively respond to homelessness. Event to focus primarily on building a Nightstop network across Scotland, but also speak to opportunities of Supported Lodgings schemes and Shared Lives and start conversation about spectrum of community hosting. Following endorsement via/at this event, Scottish Government to consider options for further endorsement, e.g. through Housing Options guidance.
- **Community Hosting Pilot:** Scottish Government to fund a two to three-year pilot allowing two local authority areas to develop, scale and test full range of community hosting models, and explore efficiencies and flexibilities gained from running Nightstop, Supported Lodgings and Shared Lives schemes alongside each other. By funding two pilots, this investment could test the model in urban/rural and different housing market contexts. Undertaking a pilot in an area where some community hosting (e.g. a Nightstop service) is already in operation, may enable the pilot to get further faster. Learning from these pilots could inform the national roll out of community hosting models to complement the housing-led initiatives also recommended by the Action Group and diversify the housing offer available to those experiencing or at risk of homelessness. Significant work will need to be undertaken to design a pilot effectively such that a local authority would be prepared to undertake it, and to maximise the pilots’ capacity to generate effective change. The Nightstop event above can be considered step 1 on these tasks. Estimates on the cost of running Nightstop, SL and Shared Lives schemes (see appendix one) provide a starting point for estimating the costs of such a pilot.

Ongoing actions from members of the Working Group

- Lorraine McGrath (Simon Community/Streetwork) and Ben Hall (Shared Lives Plus Scotland) are developing thinking on how Shared Lives can be tailored to the homelessness context, including meeting with the Care Inspectorate.
- Depaul have resourced their Nightstop network manager Ian Forster to spent two days a week in Scotland developing Nightstop provision, to be reviewed in March 2018.
- Beth Watts and Catherine Francis are working on a Scottish Government/European Social Innovation Fund project on the feasibility of scaling Supported Lodgings in Scotland for young people at risk of or experiencing homelessness. Final report and event in Summer 2018.

1. Background to Discussion⁴

No recourse to public funds

- Section 115 of the Immigration and Asylum Act 1999 states that a person will have ‘no recourse to public funds’ (NRPF), if they are subject to immigration control. The NRPF restrictions affect a wide range of people. NRPF applies to asylum seekers and can be a condition attached to certain visas (e.g. student and spousal visas).
- The Immigration Rules define benefits considered as ‘public funds’. These include welfare benefits; council housing; homelessness assistance; and discretionary support payments by local authorities or devolved administrations in Scotland and Northern Ireland, which replace the discretionary social fund, e.g. the Scottish Welfare Fund.
- There is further complexity in relation to the interaction of reserved immigration legislation with devolved legislation. Legislation on NRPF seeks to prevent migrants from accessing public funds, whereas devolved legislation generally seeks to ensure people can access the services and support they need to maintain an adequate standard of living.
- Financial support from a local authority under community care and children’s legislation is not a ‘public fund’. However, Section 120 of the Immigration and Asylum Act 1999 amended section 12 of the Social Work (Scotland) Act 1968 to prevent local authorities from being able to provide accommodation (which includes subsistence support) and welfare support under those provisions to asylum seekers, where their need for care and attention has arisen solely because of being destitute or because of the physical effects of being destitute.

Destitution

- Destitution is legally defined in section 95 of the Immigration and Asylum Act 1999. A person is destitute if they do not have adequate accommodation or any means of obtaining it, whether essential living needs are met, or have adequate accommodation or means of obtaining it but can’t meet other essential living needs.
- Asylum seekers do not have the right to work and have no recourse to public funds. This means that they cannot access social housing or welfare benefits. If they would otherwise be destitute, they can apply to the Home Office for section 95 support, which includes accommodation on a no choice basis and financial support of £36.95 (increasing to £37.75 on 5 February 2018) per person per week to pay for items such as food, clothing and toiletries.

2. Scottish Parliament Equalities & Human Rights Committee: Inquiry into Destitution

In May 2017, a parliamentary inquiry published comprehensive findings on destitution, asylum and insecure immigration status in Scotland. The scope and recommendations were broadly endorsed during HARSAG consultation with experts. The SG briefing further noted that:

⁴ Excerpt from Scottish Government Briefing Paper, January 2018

- Over the past few years, the UK Government has been tightening access to public services and support by asylum seekers and people with no recourse to public funds, as part of its aim to create ‘a hostile environment for illegal immigrants’. Asylum support has been reduced, and many people, who have been refused asylum, receive no support. Organisations working with asylum seekers have reported an increase in destitute people seeking their help.
- The Committee aimed to consider the issue of destitution as it relates to asylum seekers and people with insecure immigration status in Scotland, and the ways in which public services can mitigate destitution. The Committee wanted to explore the gaps in the response to destitution from Scottish public authorities and to identify where changes could be made to policy, standards and guidance to address destitution
- The Committee’s report of the Inquiry, *Hidden Lives – New Beginnings: Destitution, Asylum and Insecure Immigration Status in Scotland*, was published on 22 May 2017.⁵ The report makes 28 recommendations, 23 for the Scottish Government. The Scottish Government responded on 21 July 2017 and agreed to take forward work to develop an anti-destitution strategy.

3. HARSAG Further Consultation Undertaken

People with lived experience

6 people who are homeless and with no recourse to public funds participated in a focus group held on 5 Feb 2018 hosted by Glasgow Asylum Destitution Action Network. Key points of discussion were:

- A sense that the removal of ‘exceptional leave to remain’ (2005) has led to an increase in homelessness amongst asylum seekers, with more people using night shelters. Also, to make a fresh asylum claim you need to travel to Liverpool which is very difficult and forces people into even more vulnerable/unsafe situations;
- That there is confusion about what NRPF means across the public and voluntary sectors, with a sense that if staff don’t know what help they can provide, they automatically say they can’t provide any, which is not always true. There would be benefit in clear guidance about who can do what in what circumstances (e.g. if there are children involved, if the person has care needs);
- Issues within Serco accommodation and specifically examples of staff entering people’s accommodation without permission. A point was also made that Serco is attempting to make it easier for them to reclaim properties more ‘forcibly’ if someone’s asylum claim is refused;
- Ongoing issue of legal aid and support to challenge decisions or make a fresh claim. Sense that legal aid rates are so low that lawyers must take on too many clients and can’t offer the level of assistance people require. It is also difficult to access lawyers with the required knowledge, skills and specialism in this area.

⁵ <https://digitalpublications.parliament.scot/Committees/Report/EHRiC/2017/5/22/Hidden-Lives---New-Beginnings--Destitution--asylum-and-insecure-immigration-status-in-Scotland>

Expert Frontline, Legal & Policy Organisations

- A roundtable discussion was held on 14 February 2018, hosted by Positive Action in Housing. 17 people attended from COSLA and from expert frontline and policy organisations including Scottish Refugee Council, Positive Action in Housing, Refugee Survival Trust, GLADAN, Red Cross Scotland, Just Right Scotland, Maryhill Integration Network and the Glasgow Night Shelter. GHN and Scottish Government (Homelessness Team) represented HARSAG. *Participants at appendix.*
- It was discussed that the Scottish Government had a very progressive position that ‘New Scots’ are Scots from day 1, encompassing people seeking asylum and EU nationals. However, there was an overall sense this strong political welcome provided by Scottish Government does not extend as far as it needs to ensure that people are assisted while their appeals etc are progressed.
- The roundedness of the 2017 Parliamentary Inquiry, the range of evidence and the breadth of recommendations were broadly endorsed. While a new Scottish Government anti-destitution strategy is expected to ingrate the 28 recommendations for action, it was noted that no movement on this had so far been felt by those on the ground.

4. Recommendations

It is important that HARSAG recommendations don’t replicate or contradict the anticipated content of the Scottish Government anti-destitution strategy as this development will have the greater texture and detail that people’s health and well-being are depending upon.

However, there are identified priorities from the inquiry that are strongly considered as having the potential for the greatest immediate impact. These should be brought forward and resourced without delay alongside improvements to existing structures that would assist in their delivery.

There are 4 proposed recommendations to Scottish Ministers that could immediately help to relieve destitution among people with no recourse to public funds. These are:

- **D1:** Funding for a preventative **Independent Advocacy** service in key cities and covering both people destitute through the asylum process and those EEA nationals who are without recourse. This should be scaled and costed proportionately.
- **D2:** A cross-sector anti-destitution **Strategic Alliance** should be established, and infrastructure supported. This should bring together the public and third sectors working especially on asylum and immigration, housing, local government and health.
- **D3:** Evidence is already available supporting the effectiveness of **Community Hosting** as a temporary accommodation solution in this context (e.g. PAIH Room for a Refugee). Extending this model should be progressed and resourced alongside the geographically targeted community hosting pilots as recommended by HARSAG.
- **D4: Urgent investigation** should be instructed by Scottish Ministers on the experiences of people resident in Home Office ‘asylum accommodation’ currently managed under public contract by Serco. Findings should be presented to the Home Office to inform the 2019-2029 accommodation contracts and aim to achieve better alignment with Scotland’s legislative and policy context. This investigation should focus on people’s sense of safety and security and explore the potential for Scottish regulatory or best practice standards for asylum dispersal and accommodation.

Participants of the NRPF Expert Frontline, Legal & Policy Roundtable

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Jen Ang	Just Right Scotland
Maggie Brunjes	GHN/HRSAG
Nicola Dickie	COSLA
Claire Frew	Glasgow Homelessness Network
Marion Gibbs	Scottish Government
Chris Ho	Positive Action in Housing
Phil Jones	Glasgow Night Shelter
Jillian McBride	Red Cross Scotland
Cath McGee	Refugee Survival Trust
Graham O'Neill	Scottish Refugee Council
Robina Qureshi	Positive Action in Housing
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Sunny Singh	Positive Action in Housing
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With thanks to:

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