



homeless action scotland

Health and Social Care Integration General Comments relating to Set 1 Draft Regulations and Orders Relating to Public Bodies (Joint Working) (Scotland) Act 2014

Homeless Action Scotland is pleased to respond to the consultation on Set 1 of the draft regulations relating to public bodies joint working. Homeless Action Scotland is the membership body for organisations and individuals working to combat and prevent homelessness in Scotland. Our members include voluntary organisations, housing associations, local authorities and interested individuals.

We wish to raise some general points, which do not fit neatly into responses to the specific questions raised in the consultation document, which we trust will be considered in the development of the Regulations, any Guidance which is developed or indeed the operational practice once the integration of these services is in place.

The first issue is very general, but fundamental. It is about the equality of esteem between the various professions involved. There is a very clear focus on the social work and health professions throughout the legislation and draft regulations. The legislation, however, also specifies the importance of housing, but throughout there is very little mention of the role of housing, and the professional approach which housing will offer. Homeless Action Scotland would like to see a more balanced approach, giving equal importance to all roles and professions involved.

There is a danger that important elements, which are vital to the success of the integration process, will be sidelined. There is no clear indication that the expectation should be that those involved in housing at the strategic rather than landlord level should be at the top table developing integration strategies and plans.

Nor is it clear how a housing led or housing inspired approach to tackling issues will be clearly heard and understood in the development of strategies and services. The recent development of 'Housing First' in the United States, and also piloted in Glasgow by Turning Point (as well as across Europe) is showing excellent results for people with complex needs. Other new developments in the housing field, which are housing-led, and housing in approach, are developing. The tone of all of the narrative around integration is around 'medicalising' or 'welfarising' the approach to tackling issues. There needs to be serious attention paid to how the housing led approach can gain parity of esteem.

The second major issue is that the regulations and narrative appear very institutional in their approach. There is no mention of including in the base line information gathering an understanding of people's existing or future home environment. If at the centre of the focus for integration is more people living at home, there will need to be a better understanding at both strategic and individual level of the home environment.



Overall there also needs to be a link to the housing options approach which is being used both as a means of preventing and resolving homelessness and also in relation to housing people with a range of disabilities or other needs.

A further issue in relation to housing support is the lack of clarity in what is meant. Whilst we welcome the intention of eradicating the distinction between housing support and care where appropriate, the definition will inevitably not include the enhanced housing management paid through rental income which is required in a range of housing for people with additional needs, whether homeless or, for example women's refuges, temporary accommodation or interim accommodation where people stay only for a short period. Some consideration needs to be given to how this can best be addressed.

In a number of the areas which 'may be' prescribed, such as homelessness, housing with care, adaptations and housing support, the service will be provided in partnership between various sectors (voluntary, local authority, housing association, health and private). There will therefore need to be some form of partnership governance established if the new arrangements are to be truly effective.

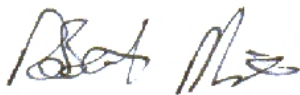
In many cases entire sections of legislation are described as needing to be transferred when it is only specific sub sections which should be. If these fall under the 'must be delegated' category, this could lead to unintended consequences where inappropriate services are required to be transferred. All references to the legislation should be proofed to ensure that only those precise subsections that apply to the services for delegation are specified.

We welcome the focus on prevention as a driver of service provision. There is no direct reference to a link with the data collection agreed under the new 'Prevent1' national monitoring system which records housing support interventions amongst others.

Further comments appear in detailed responses to the individual consultation papers.

Homeless Action Scotland is happy for this paper also to be made publicly available and its contents shared and to elaborate on any of the points raised.

Yours sincerely



Robert Aldridge

Chief Executive