

Transforming the use of Temporary Accommodation in Scotland

An interim report on the activity of the
Homelessness and Rough Sleeping Action
Group

INTRODUCTION

Having made recommendations to reduce rough sleeping in the winter of 2017/18 and further recommendations on how to end rough sleeping in Scotland, this set of proposals looks at how we can transform the use of temporary accommodation.

The aim of these recommendations is to reduce the numbers of lives 'on hold' and ensure temporary accommodation consistently provides the crucial safety net it is intended to provide.

If and when required, temporary accommodation should contribute to ending someone's experience of homelessness as quickly as possible moving them back into mainstream accommodation.

The Action Group is clear that Scotland can become a nation where people do not have to sleep rough. It can also be one where settled accommodation is obtainable for all, and temporary accommodation is the 'stop-gap' it was always meant to be.

A Local Authority senior manager said,

'When priority need changed, we increased our units of temporary accommodation because more people were coming through the homeless system. So we were gathering more and more units of temporary accommodation and it was kind of like a sausage factory. We're putting loads of people into temporary accommodation but nothing was coming out at the end.'

The Homelessness and Rough Sleeping Action Group ("HRSAG") starts from the principle that tackling homelessness means everybody being housed. Housing isn't the only element that needs to be addressed, but fundamentally it is about people being housed. Temporary accommodation is seen as a necessary stop-gap to be used because of need or choice, but the objective for all homeless people is to ensure they are housed in settled, mainstream accommodation of their choosing as soon as possible to enable them to get on with their lives.

Generally, this means housing people quickly. If there is a particular matter of choice or need that requires a different solution, then the right support and the right accommodation needs to be found. If the need or choice is something that persists then the right support and accommodation needs to be found for that need or that choice, and this is not something the Action Group considers to be a matter of temporary accommodation.

10,873 households were in temporary accommodation on 31 March 2017 – doubled since 2003, but stabilised since 2010. The HRSAG does not believe that this state of affairs can be allowed to continue, and does not believe that it is inevitable. While the Group is not recommending a particular target number, it is clear that a reduction from 10,873 is desirable, as is a reduction to or below the number that pre-dates the rapid increase from 2003 when the figure was 5,403.

Analysing the use of temporary accommodation has not been straightforward as the term Temporary Accommodation is often used interchangeably with Supported Accommodation, and indeed supported accommodation is frequently used to discharge a temporary duty to accommodate. Throughout HRSAG's discussions, we have tried to be clear that temporary accommodation is about tenure and security, not about the presence or otherwise of support – some supported accommodation is temporary and some is longer term or permanent.

By the term temporary accommodation, the Action Group is considering short-term stop-gap solutions, with support if necessary; not broader and on-going supported accommodation.

We have also recognised that the current situation is in-part a result of a complex funding regime for temporary (and supported) accommodation. The hard work of local authorities to accommodate people needs to be recognised.

This report sets out the recommendations of the HRSAG to transform the use of temporary accommodation, in the following areas:

1. Reducing the need for temporary accommodation in the first place by:
 - a. reducing demand through effective prevention and re-housing,
 - b. improving outflow or move-on;
2. Where temporary accommodation is required, ensuring the support that those people using temporary accommodation need is in place right from 'Day 1' and is in place for as long as is required – including when they are in mainstream settled accommodation if that is what they need;
3. Where temporary accommodation is required, ensuring it is of a nature, quality, standard and timescale that fits the needs and choices of the households involved, and that these aspects of temporary accommodation are effectively regulated.
4. That the financial arrangements enable us to reduce need, ensure support and maintain and improve the quality of the accommodation, allowing people to move on from temporary accommodation into settled accommodation.

In drawing our conclusions, we have considered the input from the following sources of evidence:

- 'Aye We Can' research of people with personal experience of homelessness
- Frontline Network, which brings together the views of frontline workers in the homelessness sector
- HRSAG Stakeholder Group
- A report from Heriot Watt University setting out a comprehensive analysis of the current use of temporary accommodation across Scotland - *Temporary Accommodation in Scotland Interim Report by Mandy Littlewood, Beth Watts and Janice Blenkinsopp*
- An assessment of the evidence available on what works in temporary accommodation, based on what is effective on supporting moving people out of homelessness - *The Evidence on Temporary Accommodation by Suzanne Fitzpatrick & Beth Watts*
- Interim findings from consultancy research commissioned by HRSAG following existing recommendations on a shift to rapid rehousing: *Scotland's Transition to Rapid Rehousing by Anna Evans, Indigo House*

The 'Aye We Can' work on temporary accommodation identified the following priorities for people with personal experience of homelessness:

- Rethink Bed & Breakfast accommodation; it is unsuitable
- Provide permanent homes (with support) as quickly as possible
- If it is needed, focus on independent housing in community settings – with cooking, washing, internet
- In shared accommodation – flexible rules around curfews, visitors and nights away
- Support in supported accommodation dictated by need, not by availability of move-on accommodation

- Ensure staff are trained in responding to trauma, addictions and mental health

The report on the evidence of what works sets out the following principles that have informed HRSAG's work:

- The quality of life benefits of having a secure home indicates that people should spend the minimum length of time in temporary accommodation consistent with their being able to access a suitable secure housing outcome;
- Where temporary accommodation is necessary, it should be provided in self-contained, dispersed properties wherever possible, with a furniture package made available to all homeless households who require it, and with accommodation that is suitable for couples, people with dogs, etc;
- Opportunities should be sought to 'flip' temporary accommodation into secure tenancies wherever this meets the needs of the homeless household;
- Large-scale, generic and/or unsupported hostels have no place in a transformed temporary accommodation landscape in Scotland;
- There will be a continuing role for specialist forms of intensively supported temporary accommodation for particular groups, such as vulnerable young people or people fleeing violence or abuse, and some of this provision may be shared or congregate in nature. However, it should always be small-scale, high quality, have a specific support purpose, and a clear rationale for its 'temporary' rather than settled status;
- There will also be an ongoing need for emergency accommodation, but every effort should be made to expand the 'non-institutional' emergency accommodation options available and used by Local Authorities;
- The use of B&B accommodation as emergency provision should be kept to an absolute minimum but not eliminated altogether as there are occasions and places (such as in parts of rural Scotland) where it may be the only or most appropriate option. Its use should be subject to both strict time limits and rigorous standard requirements for all homeless households, including single people as well as families with children.

The remainder of this report introduces each of the 3 recommendation areas, and provides the detailed recommendations of the HRSAG.

Throughout the report, recommendations made by HRSAG previously in the report on ending rough sleeping which are reproduced in this report are highlighted **yellow**, and the new recommendations being added are highlighted **green**. The combination of recommendations is the full report on temporary accommodation, and the highlighting is used to note how recommendations being made in this next phase of the HRSAG's work build on the work done to date. A summary of all recommendations covered in this report is included at [Annex 1](#).

SECTION 1 – REDUCING THE NEED FOR TEMPORARY ACCOMMODATION IN THE FIRST PLACE

1.1 By reducing demand through effective prevention and re-housing

1.1.1 Prevention

In the earlier report from the HRSAG, 'Ending Rough Sleeping in Scotland', a number of recommendations were made which focused on preventing rough sleeping in the first place. Many of those recommendations also apply to reducing the use of temporary accommodation by preventing homelessness in the first place.

These recommendations need to be supported by legislation on homelessness prevention and removing barriers to support, thus reducing the need for temporary accommodation.

As recommended by the HRSAG, a prevention duty should place responsibility on public bodies and other allied organisations to work effectively together to prevent and relieve homelessness where someone is at risk of homelessness – by 'public bodies and other allied organisations' we refer to the primary accountability of Local Authorities, but we also refer to other public agencies (prisons, the care system, healthcare, the military, refugee services etc.), to voluntary sector organisations commissioned by public bodies, and Housing Associations.

In addition to this, existing powers should be used to reduce barriers to people getting the support they need so that people can be helped at the earliest opportunity and use of temporary accommodation can be reduced or eliminated. In particular, the HRSAG has already recommended abolishing 'local connection' rules, limiting 'intentionally homeless' to the very narrowest definition of 'wilful recklessness' – and even then maintaining a duty to accommodate.

Implicit in many of the recommendations on prevention is the need to continue to build on the strengths of the Housing Options model, ensuring it is equipped and resourced to be accessible to all, flexible in relation to the needs of people who are homeless or at risk of homelessness, and agile in working effectively with other front-line services.

For clarity, the recommendations made by HRSAG in its report on ending rough sleeping that also apply to reducing the need for temporary accommodation are reproduced here (yellow boxes):

Ensure legislation provides sufficient support for shift to significantly greater levels of prevention - Scottish Government should examine the case for introducing a comprehensive homelessness prevention duty on local authorities and other public bodies, learning from and building on recent experience in Wales and England.

To effectively support a reduction in the need for temporary accommodation, such legislation could not be stand-alone, but would entail a review and realignment of other aspects of the homelessness and housing system such as Housing Options. So, this recommendation is strengthened to:

Legislate for a new prevention duty that brings the "Housing Options" approach into the heart of the statutory homelessness framework - so that outcome-orientated preventative practice can be better regulated, and also encouraged, as local authorities engaging in good preventative work will no longer be exposed to legal challenge. Extend robust preventative duties to other public bodies, Housing Associations and other organisations commissioned by public bodies to deliver homelessness and associated services.

Revise legislative arrangements that can result in difficulties with people being able to access their rights - Scottish Government should revise the legislative arrangements on local connection and intentionality. Specifically, they should commence the current provisions on intentionality in the Homelessness etc. (Scotland) Act 2003 and narrow the definition to focus on instances of ‘deliberate manipulation’ of the homelessness system. In addition, they should commence the provisions on local connection in the 2003 Act and Ministers should exercise powers they would then have under S8 to suspend referrals between local authorities to remove barriers to support for people who are homeless or rough sleeping or at risk of homelessness or rough sleeping. Scottish Government should monitor the impact of these changes on local authorities to respond to any LAs coming under undue pressure as a result of disproportionate net inflows.

Ensure local authorities and public bodies work together to prevent rough sleeping at every opportunity - There must be progress across the public sector to maximise opportunities to prevent all homelessness and rough sleeping. They should ensure adoption of a “no wrong door” approach to people who need homelessness assistance from any public or 3rd sector agency. Adopting the purpose, skills and culture of multi-agency housing options, we need to invest in empowered frontline-services, where staff are trained in trauma and psychologically informed environments (PIE) to ensure that people are assisted positively to access emergency and settled accommodation and support services rapidly. Local Authorities should transform the delivery of homelessness assessments to be more flexible, accessible and integrated with frontline services where homeless people are engaged and we should support LAs to discharge their statutory function on assessment through partnership with the wider public sector and third sector.

Ensure plans are always agreed – or agreed as quickly as possible – to prevent homelessness for the groups who are predictably at highest risk of rough sleeping - Scottish Government and all public bodies should respond to evidence of which groups constitute the highest proportion of people resorting to rough sleeping to clearly articulate the pathways and interventions needed to prevent this outcome for particular groups. Evidence suggests this would include:

- People leaving public institutions such as prison, mental health services, armed forces;
- People with previous experience of public institutions such as prison, mental health services, armed forces;
- Groups with particular needs such as people who have experienced domestic abuse, migrants, asylum seekers, refugees, people experiencing relationship breakdown, LGBT groups and people with experience of the care system or on leaving the care system;
- People who have experienced or are experiencing poverty and/or adverse childhood experiences; and
- Those facing potential eviction from the private rented sector, or the social rented sector including particular approaches on rent arrears.

Where this exists (e.g. SHORE standards for prisoners) Scottish Government (SG) and others should ensure that the pathways are implemented; and where this does not yet exist for key groups as above, SG and others should ensure pathways are developed and implemented.

In addition to these recommendations which focus on people at risk of homelessness, we need to add that supporting and enabling people to maintain tenancies is also an effective way of reducing the demand for temporary accommodation. This may include a number of approaches:

Support and enable people to maintain tenancies

- Support for households in groups known to be particularly at risk of homelessness, through ongoing support to sustain tenancies, especially at times of potential rent arrears or at times of relationship breakdown. This includes taking steps to ensure victims of domestic abuse are able to maintain their tenancy if this is their choice;
- Maintaining tenancies for people who are going to be absent from the property while in prison (particularly those on short-term remand) or in a hospital or other health institution. Much of this can be reinforced in a legislative prevention duty for public providers of housing and housing associations;
- Tenancy sustainment schemes tailored to the Private Rented Sector, such as the scheme previously run by the UK Government's Department for Communities and Local Government (DCLG) known as the Private Rented Sector Access Development Scheme, which supports local 'Help to Rent' schemes to support homeless people and landlords and rent deposit bond schemes. Local Authorities have a duty to provide a rent deposit scheme within their area, but steps need to be taken to ensure these are fully accessible and comprehensive.

1.1.2 Rapid Re-housing

The HRSAG report on ending rough sleeping set out a clear structural and cultural move to rapid re-housing as the default means for re-housing people who are experiencing homelessness or at risk of homelessness. This is also key to reducing demand coming into the temporary accommodation system.

In many cases, the current system is a "temporary accommodation by default" approach; and we have recommended a transition to a "rapid re-housing by default" approach because better outcomes are aligned with minimising the time spent in temporary accommodation, with the fewer transitions the better.

Throughout the HRSAG recommendations, we have been clear that we are not talking about a one-size-fits-all system of single household housing. To be clear on this, if a congregate arrangement is appropriate due to reason of need or choice, then the smaller and higher quality the better, and tailored support for the particular cohort is important (e.g. people with experience of domestic abuse who cannot stay at home, young people, refugees or migrant homeless people deemed to have no recourse to public funds). However, also for clarity, the focus and default is on mainstream tenancies rather than congregate units.

The recommendation from the HRSAG report on rough sleeping that refers to rapid re-housing is reproduced here.

Set a clear national direction of travel to transition to a model of 'rapid rehousing' by default across Scotland, ensuring that the plans are developed and led locally to achieve this vision – this will impact on all groups of homeless people, not just people sleeping rough or at risk of doing so - 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.

By 'rapid re-housing by default' we mean:

- Someone who is rough sleeping or at risk of rough sleeping should be housed in settled mainstream accommodation as quickly as possible;
- Someone who has complex needs and is rough sleeping or at risk of rough sleeping should be housed in settled mainstream accommodation with the necessary wraparound support (in line with Housing First principles) as quickly as possible; and
- Someone who is rough sleeping or at risk of rough sleeping for whom rapid rehousing or Housing First would not yet be suitable (either because they do not want to move into mainstream housing, or because they have such a severe set of needs that they cannot safely be rehoused in mainstream accommodation) should be provided with accommodation that deals with their particular needs with the specialist support that is required.

Following further work commissioned by HRSAG, this recommendation needs to be supplemented with the following recommendation to integrate planning to ensure rapid re-housing can be achieved.

Integrate rapid re-housing requirements into the Housing Needs Demand Analysis (HNDA) - The HNDA should include a definition of multiple/complex needs (to support planning for Housing First, plus statements on the numbers, size and types of housing needed to ensure rapid re-housing (including Housing First) can be planned for, while temporary accommodation can also be forecasted accurately. Plans for rapid re-housing and Housing First should also be integrated with the Local Outcome Improvement Plan (LOIP).

1.1.3 Investment in alternatives to temporary accommodation

The recommendations made to reduce the need for temporary accommodation cannot only be achieved through process, legislation and culture. The supply of housing is fundamental to this, and in particular the supply of adequate and affordable social housing – in the right place, and of the right type and tenure to address the needs of people who are homeless or at risk of homelessness.

This observation was made in the earlier HRSAG report on rough sleeping, and is just as relevant to the question of reducing the need for temporary accommodation. The recommendations made previously are reproduced here.

Continue to ensure an adequate and affordable social housing supply - Scottish Government, local authorities and Registered Social Landlords 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 and a long term view over the next 20 years, with cross party support for the commitment.

Ensure people have a range of different options at point of crisis to support them to avoid resorting to rough sleeping - 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 (including for those without access to public funds).

1.2 By increasing outflow

The HRSAG Stakeholder Group heard directly from someone who had been living in a B&B for 13 months. She told of her life being on hold, the damage to her own mental health, and the danger and insecurity of her position.

The HRSAG does not believe that all use of temporary accommodation can, or indeed should, be eliminated, but it does believe that the need can be reduced and the length of time in temporary accommodation can be reduced. In particular, the later section on quality and standards recommends that use of unsuitable temporary accommodation (B&B and unsupported hostels) should be equalised for all households to a maximum of 7 days.

The earlier points on housing supply are relevant here; without a planned and delivered supply of the right numbers, size and types of housing an ambition to quickly reduce the number of people in temporary accommodation can only have limited success. In areas of particular pressure, it is recommended that a Housing Options Hubs-wide regional approach be taken to planning and delivering the necessary supply rather than focusing only on individual Local Authority areas if delivery of the necessary new housing is not going to be possible in the locality.

Another principle that will need to underpin attempts to achieve quicker move-on to settled mainstream accommodation is that of fairness and access. We need to ensure that people who have been homeless are able to access housing in a fair and equitable way with others who have not been homeless.

The following recommendations are made for increasing the outflow from temporary accommodation.

Set targets for rehousing - Within the 5-year rapid rehousing transition plans to be developed by each local authority area by December 2018 there should be measures for increasing access to settled accommodation, which may involve upping the proportion of social lets to homeless households, on a transitional basis, to address the 'backlog' of temporary accommodation residents that have built up in some areas. This should form part of a broader 'whole housing system' approach which seeks to maximise the full range of appropriate move-on options available to homeless households.

Promote the widest range of move-on options – This should include: local authority provision, social housing lets, private rented sector lets, and investment in alternatives such as testing and scaling community hosting models, and clarifying the tenancy and Council Tax arrangements for sharing so that sharing options can be used as settled mainstream accommodation options, to diversify the offer to people who would otherwise be using unsuitable forms of temporary accommodation such as generic B&B or unsupported hostels.

More effective move-on into the Private Rented Sector – All options should be explored at a national, regional Housing Options Hubs and local level to enable more people to move-on into mainstream settled housing in the private sector through: increasing levels of security of tenure, use of social lettings agencies, rent deposit bond schemes, and 'help to rent' schemes such as the previous DCLG scheme which supported local projects to provide pre- and post-tenancy support for tenants and landlords alike.

Support people to make the choice to remain in their temporary housing as a settled option - Promote and support the use of mechanisms that enable a tenancy to move from temporary to settled where this is the choice of the tenants – so-called ‘flipping’ - which means the tenancy changes without the household moving. To facilitate this, we need to ensure that households in temporary accommodation have access to active and ongoing information and advice about the local area.

The following section concentrates on the support people need getting into, during and in moving on beyond temporary accommodation to ensure the best outcomes by supporting people out of homelessness. These include assertive support and personalised housing plans which encourage, enable and support people to move on at the right time and in the most sustainable way. One support-related recommendation is included in this section as it is clearly about increasing outflow from temporary accommodation.

Introduce regular and frequent review periods for people and households in temporary accommodation – By reviewing regularly this enables ongoing assessment and suitability of the accommodation option and the opportunity to explore the potential for it to become a settled option e.g. flipping a temporary furnished flat to full tenancy agreement.

SECTION 2 – SUPPORT FOR PEOPLE INTO, WHILE IN, AND BEYOND TEMPORARY ACCOMMODATION

This section is all about how we ensure the right support is in place for people and households who may need temporary accommodation. It needs to be available from Day 1, i.e. the first moment that the person who is homeless or at risk of homelessness is in contact with Housing Options, or indeed with any other public body or associated organisation such as a Housing Association or voluntary sector organisation. And it needs to be effective in stabilising, recovery, and making the transition to settled, mainstream accommodation.

There are many similar themes in supporting people through temporary accommodation as were identified in the previous HRSAG report and recommendations on ending rough sleeping. The key themes feature the role that front-line workers can play in improving the responses and outcomes for people, as they transition through temporary accommodation, along with the need for consistency and continuity of engagement, giving recognition to the role of trusting relationships based on sound understanding of needs.

Throughout this section on supporting people, we refer to ‘front-line’ workers many times. We also referred to this in the previous recommendations on ending rough sleeping. To be clear, by ‘front-line’ we do not only mean Housing Options teams, although their role is absolutely critical. We also mean the police, NHS workers, prison staff, social care professionals, Housing Association staff, voluntary sector workers and so on.

There is a critical role for an improved application and optimisation of the Housing Options assessment process, to ensure resources are matched on an individual basis as far as possible. An important factor in this will be to ensure a high and consistent standard of experience across all Local Authority areas.

There is also potential to further develop the approach to assessing Housing Support needs, as well as wider support needs as necessary, to better identify and link people with the right intensity and specialty of response, from light touch community based supports, enhanced housing management approaches from landlords and intensive Housing First packages for complex and extreme needs from highly skilled multi-agency teams.

A principle that HRSAG agreed in its work on rough sleeping also applies to support into and in moving on from temporary accommodation is a shared approach to prioritisation of vulnerability, need and access to support responses - improved first line assessments of support can better target the use of the most suitable temporary accommodation offer and provide intensive personalised and adequately resourced support responses, targeted to those most in need. Prioritised responses targeting the most in need first and rapid access - targeting those of most concern towards accommodation options specifically designed and resourced to provide crisis intervention, enhanced assessment and therapeutic interventions and ensure that the role of temporary accommodation plays a role that extends providing a place of safety, that support is flexible and as open ended as possible.

Another key principle is the need to empower front-line workers to act quickly, appropriately and with maximum flexibility to provide personalised solutions, with personal budgets so they can act on the spot with the - opportunity to consider extending instant access to funds in the control of frontline teams, from across the Local Authority structures, such as Discretionary Housing Payments and Scottish Welfare Funds to empower and enable instant access to appropriate temporary accommodation and support more rapid transitions from temporary to settled housing options.

We also need to explore the potential for homelessness assessments (though not the decision-making which rests firmly with Local Authorities) to be devolved in practice, building on the ‘no wrong door’ concept. This can deliver not only a more responsive and better informed system but also a more efficient one economically. There is also merit in focusing strongly on moving from support and care planning to a standard personal housing plan approach, with clarity from the earliest point on where the best opportunity for settled living exists both in terms of aspirations and the local housing context.

The recommendations of HRSAG for supporting people into, while in, and in moving on from temporary accommodation and into settled, mainstream accommodation are set out below.

Personal housing planning – the personal housing plan needs to become the default personalised planning tool for people who seek assistance in securing settled accommodation. While there may be a wide range of issues to resolve, the focus needs to be maintained on enabling people to move towards or directly into settled mainstream accommodation with whatever support they need to sustain that accommodation. This will in many cases and for many reasons include time in temporary accommodation, but personalised planning with a focus on housing is a key element of this.

Empower front-line workers – so that decisions and resource allocation are as flexible and responsive as possible, and trusting relationships can be built that ensure psychologically-informed approaches can be taken. For example:

- Extend the role of front-line staff to carry out first line housing options / homelessness assessments - focused on a no wrong door approach and supporting rapid transition to the right resource e.g. place of safety. (To be clear, this does not mean decision-making on homelessness assessment, but maximising the flexibility of the Housing Options model);
- Increase and empower the range of frontline staff that can allocate accommodation and support to those of most concern;
- Explore the potential for devolving financial resources to frontline provision that will support rapid transitions from temporary accommodation, including access to Discretionary Housing Payments and the Scottish Welfare Funds to facilitate rapid assessment and transition to the best possible accommodation/housing option.

Enable and encourage evidence-based support interventions, focused on people sustainably moving out of homelessness as the key outcome – we are not prescribing the approaches to be taken in every circumstance, but through training, provision of evidence and a focus on personalised housing plans, we need to equip front-line workers to deploy the right evidence-based interventions. For example:

- Highly personalised responses and improved consistency and continuity for those with ongoing social care needs - taking learning from LEAP Practitioner and Family Group Conferencing models;
- Targeting assertive in-reach and intensive case management for those navigating known high risk transition points (e.g. prison leavers, hospital discharge) to move on to settled tenancies - learning from and deploying Critical Time Intervention (CTI) approaches.

Widen the options of temporary accommodation to maximise the opportunities to move-on to settled, mainstream accommodation – while the principles and evidence are clear about rapid re-housing and Housing First, and quite rightly focus attention on settled, mainstream accommodation, we also need to ensure the widest range of options are open where temporary solutions are needed. For example:

- Develop community based, landlord-led informal supports for people within mainstream temporary accommodation with low level social care need e.g. supportive neighbours, community volunteer programmes;
- Widening the range of crisis intervention models to include community hosting options such as Nightstop and further exploring the role that other both paid and volunteer hosting roles can offer;
- Supporting the redesign of current models of purpose built service provision towards models which prevent repeat homelessness through highly supported, highly skilled small scale specialist congregate models that are trauma informed and designed around meeting specific needs e.g. vulnerable young people;
- Recognise that long term intensive supported accommodation can be a settled living option for some - viewing anything that is planned on a basis of 12-month plus occupancy as settled living.

SECTION 3 – QUALITY, STANDARDS & REGULATION OF TEMPORARY ACCOMMODATION

While many of the recommendations above will reduce the requirement for temporary accommodation, there will still be a requirement for temporary accommodation solutions, where there is a very short-term stop-gap required, where specialist support is required above and beyond that for a Housing First solution, or where the choice and needs of the individual require a short-term solution rather than a mainstream, settled accommodation solution (for example some young people, women who have experienced domestic abuse and need a secure location for the time being).

It is important to ensure temporary accommodation is a stepping stone, rather than a hindrance, to settled mainstream accommodation in the future. Living in temporary accommodation should not worsen a household's situation or hold them in homelessness for longer, but rather should be an opportunity to prevent repeat homelessness and make sure a household moves on to a secure tenancy as soon as possible.

Introducing standards is an opportunity to address these things and ensure that temporary accommodation in 21st century Scotland is good quality, safe, warm and affordable. It should also be a means through which people who are homeless and waiting for a settled home, are able to access the advice, support and signposting they need in order to move away from the immediate crisis of homelessness.

The Homelessness and Rough Sleeping Action Group has a clear view that there is an appetite and a need to improve standards and consistency. We believe that legally-enforceable standards should apply to all types of temporary accommodation

The framework for developing standards exists in the 2004 consultation around Section 7 of the Housing (Scotland) Act 2001, which gave ministers the powers to set out regulations and terms of occupancy for 'those living in hostels'. No regulations were implemented as a result of this consultation.

3.1 Temporary accommodation standards

Standards in temporary accommodation are extremely variable both across different local authority areas and in terms of the types and provider of that accommodation.

In 2011, Shelter Scotland and CIH Scotland produced guidance on Temporary Accommodation standards which set out a benchmark for quality, location and the management of temporary accommodation. This guidance was written in consultation with providers of temporary accommodation and those with experience of living in temporary accommodation. This guidance was written to cover the gaps in existing housing quality standards which some types of temporary accommodation were falling through (such as the Scottish Housing Quality Standard (SHQS) or the Unsuitable Accommodation Order), but also to look beyond the physical condition of the properties at the standard of management and service provided to people in temporary homes.

These standards are not limited to the physical standards of the property, but rather they cover all the factors that make for good quality temporary accommodation:

Physical standards

- The accommodation should be a sufficient safe and secure space, is suitable for any disability requirements, is clean, heated well, has adequate access to on site cooking, bathroom and washing facilities. Households are given notice when landlord needs to access the room
- Has adequate communal living space which includes, for example, space for children to play or do homework
- Has access to adequate cooking facilities
- Has a suitable standard of furniture to meet the families' needs

Suitability standards

- Accommodation must be suitable for the specific needs of the individual applicant, and of his or her household. Accommodation must also be affordable for an applicant, and the location, the physical features, and other elements of the accommodation are also relevant in this context

Location and network standards

- The accommodation should be located close enough to services (supermarket, doctors etc.) so that they can be reasonably reached by foot or public transport, and to support networks and places of work.
- It should meet cultural or religious needs as well as social and economic needs

Service standards

- An assessment of need should be carried out and referrals to appropriate agencies made, with periodical reviews. Flexible and needs-led support is provided and there are regular visits by allocated officers, all underpinned by good quality communication

Management standards

- There should be procedures in place in regards to moving in and out of the accommodation and how possessions will be protected.
- Residents should have the opportunity to be involved in discussions regarding their stay and their needs. There should be sufficient numbers of trained staff to realise these standards and understand the needs of the people using temporary accommodation
- Tenants should be provided with a written occupancy agreement, details of any accommodation rules and repairs and complaints procedures.
- *In addition, In light of changes to social security with the introduction of Universal Credit, a rent statement of charges and how they are paid should also be a requirement.*

These standards were welcomed by some housing providers and have been used as a reference point by some local authorities, but they have no legal footing and are therefore unenforceable.

Introduce a legally enforceable standards framework for temporary accommodation - The Scottish Government should take the Chartered Institute of Housing and Shelter Scotland standards as a framework and consult the sector including local authorities, housing providers, third sector partners and those who have experience of temporary accommodation to produce a set of agreed standards covering all types of temporary accommodation.

The HRSAG believes that better standards could be achieved through the introduction of legal mechanisms to improve practice:

Secondary legislation

- Section 29 of the Housing (Scotland) 1987 Act is the ‘Interim duty to accommodate’ compelling local authorities to accommodate all those they ‘have reason to believe’ are homeless. It is through this section of the Act that The Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014 was introduced as a Scottish Statutory Instrument (SSI).
- Introducing an equivalent SSI that defines the suitability of the temporary accommodation as per the agreed standards the Scottish Government has consulted on would put new quality standards into legislation.

Statutory Guidance

- Given the recent HARSAG recommendation which has been accepted to revise the statutory Code of Guidance, it makes sense to also include new standards within a refreshed Code of Guidance. Section 37(1) of Part II of the Housing (Scotland) Act 1987 (as amended by the 2001 and 2003 Act) requires local authorities to have regard to Guidance issued by the Secretary of State in the exercise of their homelessness functions. The Code of Guidance provides such guidance.
- By including the agreed standards within a revised Code of Guidance, this would add detail and emphasis to the provision made through secondary legislation.

It is important that both these elements are taken forward. The introduction of secondary legislation would be the strongest legal expression but would, by necessity, be restricted by what is possible to put into an SSI and what can be expressed legally.

3.2 Limiting time in unsuitable temporary accommodation

With agreed standards for temporary accommodation, we also need to consider the use of unsuitable temporary accommodation. This is defined in law for families with children and pregnant women in the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014. For families with children or pregnant women, time in unsuitable temporary accommodation (mainly B&Bs and unsupported hostels) is limited to 7 days. It is recognised that this is not conducive to tackling homelessness, and has a detrimental impact – hence the limit for some people to 7 days.

Not only is unsuitable temporary accommodation having a detrimental impact on homeless people trying to move on with their lives, but also that an estimated £29m in public funds would be saved this year if all single people predicted to live in unsuitable temporary accommodation were moved to more suitable accommodation within seven days. On average, a homeless person currently spends 38 days in unsuitable temporary accommodation so moving them on after seven days would save around £800 each time someone is moved on to more suitable housing for the remaining 31 days.

Extend the 7-day restriction on unsuitable temporary accommodation to all homeless people - Currently, there is a legal limit of seven days for families and pregnant women, but no limit at all for any other groups. A change in the law would require councils to move people into permanent accommodation quickly - or at the very least into more suitable accommodation that, whilst still temporary, provides a suitable environment for supporting the ending someone’s homelessness as quickly as possible.

To be clear, the definition of unsuitable includes such issues as:

- out with the area of the local authority which is subject to the duty to accommodate under section 29 of the 1987 Act;

- not in the locality of facilities and services for the purposes of health and education which are being used, or might reasonably be expected to be used, by members of the household, unless those facilities are reasonably accessible from the accommodation, taking into account the distance of travel by public transport or transport provided by a local authority;
- lacks within the accommodation adequate toilet and personal washing facilities for the exclusive use of the household;
- lacks adequate bedrooms for the exclusive use of the household;
- is accommodation within which the household does not have the use of adequate cooking facilities and the use of a living room; or
- is not usable by the household for 24 hours a day.

For both recommendations, on standards and time limits for use of unsuitable temporary accommodation, we need to recognise that this will be more difficult for some Local Authorities than others. It is suggested that local target dates are agreed for compliance within the 5-year Rapid Rehousing Transition Plans.

3.3 Enforcement and monitoring

The introduction of additional standards and limits needs to be reflected by the means for enforcement and monitoring of those standards and limits.

Introduce the means to enforce and monitor temporary accommodation standards - Once introduced, it is critical that adherence to these new standards is comprehensive. The Scottish Housing Regulator should have responsibility for monitoring compliance. This should be through thematic enquiry and risk based intervention as with other statutory housing duties. It will also need to be considered how Scottish Government homelessness statistics data collection could be amended to reflect new/enhanced obligations. Nationally collected statistics would be an additional tool for monitoring compliance.

SECTION 4 - THE FINANCING OF TEMPORARY ACCOMMODATION

4.1 Funding principles

The financing of temporary accommodation is complex and is based on a system of high rental charges where the full cost of the accommodation and housing management services are borne by the homeless household.

The debate should be about how the costs of homelessness are currently met and who they fall on. Most homelessness services in Scotland are funded through the Local Authorities' General Funds from a mix of council tax contributions, and general taxation through Scottish Government Grant Aided Expenditure (GAE). This is the case for all prevention, homelessness assessment, and housing support services provided to homeless households.

However, this is not the case for temporary accommodation. There is no support from the Local Authority General Fund as the rent charges must cover the expenditure on services. This is the current policy in all but 2-3 Local Authorities.

The majority of households claim housing benefit to cover the rent charges, funding ultimately provided through the UK Government Treasury. If a household's eligibility to claim full or partial housing benefit is changed through access to employment, training or further education, the household cannot continue to pay the rent and arrears quickly accrue. This ultimately acts as a

disincentive for the household to do anything to alter their housing benefit status, and acts as a so-called poverty trap while in temporary accommodation.

We do not believe that this is fair and equitable in the context of Community Plan Partnership Local Outcome Improvement Plans (LOIPs) based on reducing poverty in their local areas.

As a matter of principle, HARSAG believes that the financial responsibility of providing good quality temporary accommodation should not fall solely on the shoulders of the homeless household.

Homelessness is not the fault of the homeless household and can affect anyone living in our society. As with Homelessness Services in Local Authorities, temporary accommodation should also be funded by a contribution of more reasonable rent charges and contributions from the Local Authority General Fund. In effect, the costs should be shared between the homeless household and the citizens in each Local Authority area.

The costs of homelessness and temporary accommodation should be a citizen-funded service, supported by Local Authority General Fund finance, and by Scottish Government Grant Aided Expenditure.

4.2 Redesigning the funding model

HARSAG's interim report on Ending Rough Sleeping contained a key recommendation to transition to a model of 'rapid rehousing' by default. This approach over a 5-year transitional period will result in far higher proportion of households making a homelessness application being given permanent accommodation straight away, rather than going into temporary accommodation for a period of time.

As a direct result, less funding would be received from the UK Government through Housing Benefit due to restrictions on the amount of Housing Benefit available for general needs accommodation, in comparison to the whole costs currently available for temporary accommodation.

The funding of short-term supported accommodation is due to be devolved to local authorities in England and to the devolved administrations in April 2020. The decision is yet to be made on the Scottish funding model for short term supported accommodation.

The recent decision from the UK Government which sees Universal Credit claimants in temporary accommodation having the housing part of their payment sent directly to the provider is a short term measure that requires a permanent solution. The devolution of funding alongside devolved funding for short-term supported accommodation in April 2020 would be one such solution.

The Scottish Government and COSLA should present a strong case to the UK Government for temporary accommodation funding support through housing benefit to be devolved to Scotland.

Tackling poverty and moving households out of homelessness into more sustainable and life-enriching activities lies at the heart of LOIPs. Removing the financial barriers to access and to exit temporary accommodation and out of homelessness must be a priority for Local Authorities and the Scottish Government.

HARSAG recognises the complexity of temporary accommodation finance in Scotland. If we are to transform the use of temporary accommodation, there should be a transformation in the way temporary accommodation is funded to make it more financially affordable for homeless households. The high rents charged for accommodation creates a "poverty-trap" for households resident in temporary accommodation. This prevents homeless people accessing employment, training or further education, and ultimately moving out of homelessness.

In order to tackle poverty and give people an opportunity to access employment, training or further education and to move onto more settled accommodation, support for homelessness services should be given via a flexible grant system.

4.3 Lowering rents

The Social Bite/I-Sphere temporary accommodation research project currently underway, has highlighted that a small number of councils have reduced their rents to a level approaching a Local Housing Allowance rate.

These Local Authorities have sought to reduce the gap between Housing Revenue Account rent charges to secure tenancies and to enhanced rents charged to homeless households on the General Fund. HARSAG recognises that the leadership shown by these councils offers a positive way forward to lift the financial burden to a great extent from homeless households to a more equitable, shared basis.

Local authorities' efforts to reform and remodel temporary accommodation have been hampered in recent years by regular changes to the benefit subsidy regime and uncertainty as to the proposals and impact arising from welfare reform. In 2016 the Association of Local Authority Chief Housing Officers estimated the loss of income from reducing temporary accommodation rents to the Local Housing Allowance level would be at least £50m across Scotland due to lower claims of accommodation and support through Housing Benefit.

Rents should be set at a level similar to the Local Housing Allowance rate in order to provide a more equitable system and provide a clearer path for people to move on from TA.

4.4 Funding quality accommodation and provision of support

The securing of efficiencies in the costs of providing temporary accommodation services is the duty of Local Authorities to achieve Best Value. However, this should not compromise the quality of the accommodation and support provided to homeless households.

Research by the Chartered Institute of Housing in Scotland and Shelter Scotland has proposed a series of qualitative and location-based standards. HARSAG supports a consultation on the implementation of these standards to ensure that every homeless household who needs temporary accommodation lives in good quality and location-sensitive accommodation for as little time as possible.

The move to reduce enhanced rents in temporary accommodation must be underpinned by a recognition that Local Authorities will need funding support to continue to operate temporary accommodation and housing management support services for homeless households.

HARSAG recognises that devolution of funding from the UK Government, provides the best solution to generating the level of funding required to provide additional funding support to local authorities via the General Fund. Without enhancement to the General Fund, the risk is that Local Authorities will need to reduce the extent and quality of accommodation to keep within budget.

HARSAG has heard of instances where the former temporary accommodation management fee which has been distributed to Scottish local authorities has not been spent on temporary accommodation or homelessness services. It is clear that if additional funding were to be devolved that this budget should be directed to homelessness prevention and temporary accommodation transformational change initiatives.

Local Authorities will need financial support to bridge the funding gap created by moving to a LHA equivalent rent while at the same time ensuring that the standards of temporary accommodation

and support are maintained. The Scottish Government should address this as part of the transformation of the use of temporary accommodation in Scotland.

That the devolved housing benefit funding for temporary accommodation should be ring-fenced to ensure that spending is not repurposed and focusses on preventing homelessness.

Scottish Government Homelessness and Rough Sleeping Action Group
29 May 2018

ANNEX 1 – Full table of recommendations

Ref	Final recommendation
SECTION 1	REDUCING THE NEED FOR TEMPORARY ACCOMMODATION IN THE FIRST PLACE
1	Ensure legislation provides sufficient support for shift to significantly greater levels of prevention - Scottish Government should examine the case for introducing a comprehensive homelessness prevention duty on local authorities and other public bodies, learning from and building on recent experience in Wales and England.
2	Legislate for a new prevention duty that brings the "Housing Options" approach into the heart of the statutory homelessness framework - so that outcome-orientated preventative practice can be better regulated, and also encouraged, as local authorities engaging in good preventative work will no longer be exposed to legal challenge. Extend robust preventative duties to other public bodies, Housing Associations and other organisations commissioned by public bodies to deliver homelessness and associated services.
3	Revise legislative arrangements that can result in difficulties with people being able to access their rights - Scottish Government should revise the legislative arrangements on local connection and intentionality. Specifically, they should commence the current provisions on intentionality in the Homelessness etc. (Scotland) Act 2003 and narrow the definition to focus on instances of 'deliberate manipulation' of the homelessness system. In addition, they should commence the provisions on local connection in the 2003 Act and Ministers should exercise powers they would then have under S8 to suspend referrals between local authorities to remove barriers to support for people who are homeless or rough sleeping or at risk of homelessness or rough sleeping. Scottish Government should monitor the impact of these changes on local authorities to respond to any LAs coming under undue pressure as a result of disproportionate net inflows.
4	Ensure local authorities and public bodies work together to prevent rough sleeping at every opportunity - There must be progress across the public sector to maximise opportunities to prevent all homelessness and rough sleeping. They should ensure adoption of a "no wrong door" approach to people who need homelessness assistance from any public or 3rd sector agency. Adopting the purpose, skills and culture of multi-agency housing options, we need to invest in empowered frontline-services, where staff are trained in trauma and psychologically informed environments (PIE) to ensure that people are assisted positively to access emergency and settled accommodation and support services rapidly. Local Authorities should transform the delivery of homelessness assessments to be more flexible, accessible and integrated with frontline services where homeless people are engaged and we should support LAs to discharge their statutory function on assessment through partnership with the wider public sector and third sector.
5	Ensure plans are always agreed – or agreed as quickly as possible – to prevent homelessness for the groups who are predictably at highest risk of rough sleeping - Scottish Government and all public bodies should respond to evidence of which groups constitute the highest proportion of people resorting to rough sleeping to clearly articulate the pathways and interventions needed to prevent this outcome for particular groups. Evidence suggests this would include: <ul style="list-style-type: none"> • People leaving public institutions such as prison, mental health services, armed forces; • People with previous experience of public institutions such as prison, mental health services, armed forces;

	<ul style="list-style-type: none"> • Groups with particular needs such as people who have experienced domestic abuse, migrants, asylum seekers, refugees, people experiencing relationship breakdown, LGBT groups and people with experience of the care system or on leaving the care system; • People who have experienced or are experiencing poverty and/or adverse childhood experiences; and • Those facing potential eviction from the private rented sector, or the social rented sector including particular approaches on rent arrears. <p>Where this exists (e.g. SHORE standards for prisoners) SG and others should ensure that the pathways are implemented; and where this does not yet exist for key groups as above, SG and others should ensure pathways are developed and implemented.</p>
6	<p>Support and enable people to maintain tenancies</p> <ul style="list-style-type: none"> • Support for households in groups known to be particularly at risk of homelessness, through ongoing support to sustain tenancies, especially at times of potential rent arrears or at times of relationship breakdown. This includes taking steps to ensure victims of domestic abuse are able to maintain their tenancy if this is their choice; • Maintaining tenancies for people who are going to be absent from the property while in prison (particularly those on short-term remand) or in a hospital or other health institution. Much of this can be reinforced in a legislative prevention duty for public providers of housing and housing associations; • Tenancy sustainment schemes tailored to the Private Rented Sector, such as the scheme previously run by the UK Government’s Department for Communities and Local Government (DCLG) known as the Private Rented Sector Access Development Scheme, which supports local ‘Help to Rent’ schemes to support homeless people and landlords and rent deposit bond schemes. Local Authorities have a duty to provide a rent deposit scheme within their area, but steps need to be taken to ensure these are fully accessible and comprehensive.
7	<p>Set a clear national direction of travel to transition to a model of ‘rapid rehousing’ by default across Scotland, ensuring that the plans are developed and led locally to achieve this vision – this will impact on all groups of homeless people, not just people sleeping rough or at risk of doing so - 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.</p> <p>By ‘rapid re-housing by default’ we mean:</p> <ul style="list-style-type: none"> - Someone who is rough sleeping or at risk of rough sleeping should be housed in settled mainstream accommodation as quickly as possible; - Someone who has complex needs and is rough sleeping or at risk of rough sleeping should be housed in settled mainstream accommodation with the necessary wraparound support (in line with Housing First principles) as quickly as possible; and - Someone who is rough sleeping or at risk of rough sleeping for whom rapid rehousing or Housing First would not yet be suitable (either because they do not want to move into mainstream housing, or because they have such a severe set of needs that they cannot safely be rehoused in mainstream accommodation) should be provided with accommodation that deals with their particular needs with the specialist support that is required.

8	Integrate rapid re-housing requirements into the Housing Needs Demand Analysis (HNDA) - The HNDA should include a definition of multiple/complex needs (to support planning for Housing First, plus statements on the numbers, size and types of housing needed to ensure rapid re-housing (including Housing First) can be planned for, while temporary accommodation can also be forecasted accurately. Plans for rapid re-housing and Housing First should also be integrated with the Local Outcome Improvement Plan (LOIP).
9	Continue to ensure an adequate and affordable social housing supply - Scottish Government, local authorities and Registered Social Landlords 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 and a long term view over the next 20 years, with cross party support for the commitment.
10	Ensure people have a range of different options at point of crisis to support them to avoid resorting to rough sleeping - 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 (including for those without access to public funds).
11	Set targets for rehousing - Within the 5-year rapid rehousing transition plans to be developed by each local authority area by December 2018 there should be measures for increasing access to settled accommodation, which may involve upping the proportion of social lets to homeless households, on a transitional basis, to address the 'backlog' of temporary accommodation residents that have built up in some areas. This should form part of a broader 'whole housing system' approach which seeks to maximise the full range of appropriate move-on options available to homeless households.
12	Promote the widest range of move-on options – This should include: local authority provision, social housing lets, private rented sector lets, and investment in alternatives such as testing and scaling community hosting models, and clarifying the tenancy and Council Tax arrangements for sharing so that sharing options can be used as settled mainstream accommodation options, to diversify the offer to people who would otherwise be using unsuitable forms of temporary accommodation such as generic B&B or unsupported hostels.
13	More effective move-on into the Private Rented Sector – All options should be explored at a national, regional Housing Options Hubs and local level to enable more people to move-on into mainstream settled housing in the private sector through: increasing levels of security of tenure, use of social lettings agencies, rent deposit bond schemes, and 'help to rent' schemes such as the previous DCLG scheme which supported local projects to provide pre- and post-tenancy support for tenants and landlords alike.
14	Support people to make the choice to remain in their temporary housing as a settled option - Promote and support the use of mechanisms that enable a tenancy to move from temporary to settled where this is the choice of the tenants – so-called 'flipping' - which means the tenancy changes without the household moving. To facilitate this, we need to ensure that households in temporary accommodation have access to active and ongoing information and advice about the local area.
15	Introduce regular and frequent review periods for people and households in temporary accommodation – By reviewing regularly this enables ongoing assessment and suitability of the accommodation option and the opportunity to explore the potential for it to become a settled option e.g. flipping a temporary furnished flat to full tenancy agreement.

SECTION 2	SUPPORT FOR PEOPLE INTO, WHILE IN, AND BEYOND TEMPORARY ACCOMMODATION
16	<p>Personal housing planning – the personal housing plan needs to become the default personalised planning tool for people who seek assistance in securing settled accommodation. While there may be a wide range of issues to resolve, the focus needs to be maintained on enabling people to move towards or directly into settled mainstream accommodation with whatever support they need to sustain that accommodation. This will in many cases and for many reasons include time in temporary accommodation, but personalised planning with a focus on housing is a key element of this.</p>
17	<p>Empower front-line workers – so that decisions and resource allocation are as flexible and responsive as possible, and trusting relationships can be built that ensure psychologically-informed approaches can be taken. For example:</p> <ul style="list-style-type: none"> - Extend the role of front-line staff to carry out first line housing options / homelessness assessments - focused on a no wrong door approach and supporting rapid transition to the right resource e.g. place of safety. (To be clear, this does not mean decision-making on homelessness assessment, but maximising the flexibility of the Housing Options model); - Increase and empower the range of frontline staff that can allocate accommodation and support to those of most concern; - Explore the potential for devolving financial resources to frontline provision that will support rapid transitions from temporary accommodation, including access to Discretionary Housing Payments and the Scottish Welfare Funds to facilitate rapid assessment and transition to the best possible accommodation/housing option.
18	<p>Enable and encourage evidence-based support interventions, focused on people sustainably moving out of homelessness as the key outcome – we are not prescribing the approaches to be taken in every circumstance, but through training, provision of evidence and a focus on personalised housing plans, we need to equip front-line workers to deploy the right evidence-based interventions. For example:</p> <ul style="list-style-type: none"> - Highly personalised responses and improved consistency and continuity for those with ongoing social care needs - taking learning from LEAP Practitioner and Family Group Conferencing models; - Targeting assertive in-reach and intensive case management for those navigating known high risk transition points (e.g. prison leavers, hospital discharge) to move on to settled tenancies - learning from and deploying Critical Time Intervention (CTI) approaches.
19	<p>Widen the options of temporary accommodation to maximise the opportunities to move-on to settled, mainstream accommodation – while the principles and evidence are clear about rapid re-housing and Housing First, and quite rightly focus attention on settled, mainstream accommodation, we also need to ensure the widest range of options are open where temporary solutions are needed. For example:</p> <ul style="list-style-type: none"> - Develop community based, landlord-led informal supports for people within mainstream temporary accommodation with low level social care need e.g. supportive neighbours, community volunteer programmes; - Widening the range of crisis intervention models to include community hosting options such as Nightstop and further exploring the role that other both paid and volunteer hosting roles can offer; - .Supporting the redesign of current models of purpose built service provision towards models which prevent repeat homelessness through highly supported, highly skilled small scale specialist congregate models that are trauma informed and

	<p>designed around meeting specific needs e.g. vulnerable young people;</p> <ul style="list-style-type: none"> - Recognise that long term intensive supported accommodation can be a settled living option for some - viewing anything that is planned on a basis of 12-month plus occupancy as settled living.
SECTION 3	QUALITY, STANDARDS & REGULATION OF TEMPORARY ACCOMMODATION
20	<p>Introduce a legally enforceable standards framework for temporary accommodation</p> <ul style="list-style-type: none"> - The Scottish Government should take the Chartered Institute of Housing H and Shelter Scotland standards as a framework and consult the sector including local authorities, housing providers, third sector partners and those who have experience of temporary accommodation to produce a set of agreed standards covering all types of temporary accommodation.
21	<p>Extend the 7-day restriction on unsuitable temporary accommodation to all homeless people - Currently, there is a legal limit of seven days for families and pregnant women, but no limit at all for any other groups. A change in the law would require councils to move people into permanent accommodation quickly - or at the very least into more suitable accommodation that, whilst still temporary, provides a suitable environment for supporting the ending someone's homelessness as quickly as possible.</p>
22	<p>Introduce the means to enforce and monitor temporary accommodation standards - Once introduced, it is critical that adherence to these new standards is comprehensive. The Scottish Housing Regulator should have responsibility for monitoring compliance. This should be through thematic enquiry and risk based intervention as with other statutory housing duties. It will also need to be considered how Scottish Government homelessness statistics data collection could be amended to reflect new/enhanced obligations. Nationally collected statistics would be an additional tool for monitoring compliance.</p>
SECTION 4	THE FINANCING OF TEMPORARY ACCOMMODATION
23	<p>The costs of homelessness and temporary accommodation should be a citizen-funded service, supported by Local Authority General Fund finance, and by Scottish Government Grant Aided Expenditure.</p>
24	<p>The Scottish Government and COSLA should present a strong case to the UK Government for temporary accommodation funding support through housing benefit to be devolved to Scotland.</p>
25	<p>In order to tackle poverty and give people an opportunity to access employment, training or further education and to move onto more settled accommodation, support for homelessness services should be given via a flexible grant system.</p>
26	<p>Rents should be set at a level similar to the Local Housing Allowance rate in order to provide a more equitable system and provide a clearer path for people to move on from TA.</p>
27	<p>Local Authorities will need financial support to bridge the funding gap created by moving to a LHA equivalent rent while at the same time ensuring that the standards of temporary accommodation and support are maintained. The Scottish Government should address this as part of the transformation of the use of temporary accommodation in Scotland.</p>
28	<p>That the devolved housing benefit funding for temporary accommodation should be ring-fenced to ensure that spending is not repurposed and focusses on preventing homelessness.</p>