

7 MARCH 2018

# Ending Rough Sleeping in Scotland

---

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

## FOREWORD

The Homelessness and Rough Sleeping Action Group was set up by the Scottish Government in October 2017 to produce short and long term solutions to homelessness and rough sleeping. In November 2017 we made recommendations to reduce rough sleeping in the winter of 2017/18, and in the coming months we will address temporary accommodation and how to end homelessness.

This set of proposals sets out **how rough sleeping can be ended for good in Scotland**. The Group has agreed that in order to end rough sleeping and sustain this position we must shift to effective prevention and housing led approaches.

The expertise and experience of the Group, and the evidence from the UK and internationally, leads to the conclusion that rough sleeping is not inevitable and should not happen. That it happens is because we collectively have failed to uphold people's right to safe and secure housing.

Over the past decade, Scotland has seen significant changes in its approach to tackling homelessness. World leading legislation, based on the principle of extending rights to housing for homeless households, has provided the context for developing new and innovative approaches to prevention.

However, the establishment by the Scottish Government of the Homelessness and Rough Sleeping Action Group and the £50m Ending Homelessness Together Fund have marked a recognition that more needs to be done as rough sleeping is set to increase again, and homelessness is projected to increase unless a different approach is developed.

Homelessness can be predictable but is not inevitable; and we can take action to end Rough Sleeping in Scotland. The Action Group believes Scotland can become a nation where people do not have to sleep rough and that this set of proposals describe the action needed to end rough sleeping in this country, for good.

This position is informed by a 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). The *Aye We Can* lived experience strand of the Action Group's work has also been a key reference point.

We know there are a number of structural inequality issues which drive risk of homelessness including childhood poverty (by far most powerful indicator); geography (less likely in rural areas, in areas of lower housing market pressures); adverse experiences as a teenager (especially being excluded from school, serious drug use, being in care) and early adult experiences (leaving education early, experiencing unemployment, renting, illness/disability, social relationships).

There are also a number of contributing factors which we have not addressed here but will be considered in later phases of our work including addressing the biggest predictors of homelessness – child poverty and adverse childhood experiences; social security policy and its impact on homelessness and rough sleeping; the employment market and its impact on homelessness and rough sleeping and Public Health policy and the impact on homelessness and rough sleeping.

These recommendations are framed in the context of rough sleeping but we are clear that this programme needs to cover all groups of homeless people and this will come through in later work on transforming the use of temporary accommodation and ending homelessness altogether. Some recommendations in this document are specifically about rough sleeping, while others are relevant to rough sleeping, and are important to addressing the needs of this group of homeless people, but will remain work in progress until our further work has completed, allowing a full understanding of impact on all groups of homeless people.

These recommendations are presented to the Scottish Government as a way forward to eradicate rough sleeping. The Homelessness and Rough Sleeping Action Group recommend these actions and look to the Scottish Government, together with the Homelessness Prevention and Strategy Group and wider partners, to take the action needed to ensure meaningful, sustained progress in this important area.

Jon Sparkes, Crisis (Chair)

Russell Barr, Former Moderator Church of Scotland

Maggie Brunjes, Glasgow Homelessness Network

Mike Dailly, Govan Law Centre

David Duke, Street Soccer

Suzanne Fitzpatrick, I-SPHERE, Heriot-Watt University

Josh Littlejohn, Social Bite

Lorraine McGrath, Streetwork and Simon Community Scotland

Susanne Millar, Glasgow Health and Social Care Partnership

John Mills, Fife Council and ALACHO

Shona Stephen, Queens Cross Housing Association

Alison Watson, Shelter Scotland

## **PART 1: OVERVIEW OF THE ACTIONS NEEDED TO ERADICATE ROUGH SLEEPING**

### *When homelessness is predictable, prevent it*

1. To eradicate rough sleeping, much more has to be done to prevent people becoming at risk. We know that some groups are at higher risk of homelessness than others, such as those with experience of the care system and there are certain points where a person will be at significantly higher risk, for example on leaving a public institution; fleeing domestic violence; or experiencing relationship breakdown.
2. All public bodies have a potential role in identifying those at risk and preventing homelessness and to co-operate with each other to prevent homelessness, although the primary statutory responsibility and accountability will remain with local authorities.
3. In particular, but not exclusively, this includes people who have spent time in the care system, prison, mental health and other health services, and the armed forces. We need to ensure public bodies do not discharge people into homelessness, and we need to identify and respond to the risk of people becoming homeless at a later stage. This is not just about providing people with housing, but about their connections with the community, their support networks, their personal health and wellbeing, and a sense of structure and purpose.
4. This also relates to specific groups such as women experiencing domestic abuse, LGBT young people, people experiencing relationship breakdown, and people migrating from outside of Scotland. We need specific responses to prevent the injustice of people from these groups being further excluded and disadvantaged.
5. This needs to work together with measures to reduce child poverty, and the impact of adverse childhood experiences and trauma, which are key long-term indicators of homelessness.

### *When people are at risk of homelessness, prevent it*

6. Housing Options should be covered by a duty to prevent homelessness by acting when and where the risk of homelessness occurs – if necessary changing legislation to address the local connection and intentionality barriers to providing support.
7. Prevention is about stopping the homelessness happening; it is not enough simply to discharge into temporary accommodation – mediation and support should be applied to stop the homelessness happening in the first place.
8. Public bodies should create a ‘no wrong door’ approach where a broad range of front-line public services act on behalf of, or in concert with, Housing Options, and the flexibility to work with commissioned services and the voluntary sector where appropriate. High quality training and support for staff will be important to ensure a psychologically and trauma informed environment.

9. Housing Options have to have settled and secure housing options available with necessary support, including Housing First where applicable. This should be backed up by (but not dependent upon) low threshold emergency accommodation options where needed as a last resort to protect mental health, security, and resolve migrant status matters.
10. We need the UK policy of No Recourse to Public Funds to change for this to work fully for all; and in the absence of such change there need to be ways to mitigate or workaround the restrictions in place.

*When people do sleep rough, quickly support them into settled accommodation*

11. It is important to take swift action to quickly end street homelessness, thereby reducing the likelihood and extent of people developing more complex needs.
12. Outreach teams empowered to act on the spot, and psychologically informed approaches, should be available wherever there are people sleeping rough, offering suitable accommodation and working effectively across professional, agency or geographical boundaries.
13. Housing led approaches should be the default with the primary objective to move someone rapidly into settled accommodation rather than a temporary solution, in line with a planned pathway that makes sense for the individual. Where the person has more complex needs this is Housing First, otherwise this is rapid re-housing into settled accommodation. In a number of cases, for reasons such as health or security, this may involve short-term emergency accommodation such as 'night stop' or other interventions such as supported accommodation - but in all cases the objective is settled accommodation with no undue delay.
14. Person-centred approaches should be the default for collaboration and commissioning, for example through personalised budgets enabling outreach teams to apply psychologically informed approaches to build relationships and trust with people with complex needs who are sleeping rough and/or identify emergency solutions to minimise rough sleeping.
15. A by-name approach to people who are actually sleeping rough, enabling multi-agency responses and effective monitoring of improvements and resource requirements in real-time will be key to supporting swift, person centred, housing led responses.

*Make temporary accommodation the stop-gap it was meant to be*

16. The default for anyone at risk of homelessness has to be to rehouse them in secure and settled mainstream accommodation straight away, recognising that this will represent a significant shift from the current system. The overwhelming evidence is that for people with complex needs who are sleeping rough or at risk of sleeping rough the most effective solution is Housing First.
17. Emergency accommodation solutions need to become the exception, and where emergency solutions are needed, night stop and furnished flats are more effective than hostel solutions.

18. Where a form of supported accommodation is the best option for an individual, in short, medium or long term, this should be part of a planned care pathway.
19. The Homelessness and Rough Sleeping Action Group is commissioning research to produce a clear analysis of the use of different temporary accommodation solutions, including recommendations as to how the use of temporary accommodation can be transformed to support the ending of rough sleeping and homelessness in Scotland.

#### *Housing provision and access*

20. Every local authority area (with co-ordination across Hub regions) needs to address gaps in provision and/or access in their area and ensure the investment and planning of housing prevents homelessness and rough sleeping, including:
  - Social housing building and provision;
  - Access to, and security of, social housing for people who would otherwise be sleeping rough, including swift access to available properties and rapid decisions on wraparound support where needed; and
  - Creation of 'help to rent' and 'social lettings agencies' to ensure supply of affordable and accessible housing in the private sector.
21. Housing Options should give proactive support to enable people to navigate the multi-agency elements of obtaining housing. The objective is to achieve settled housing at the earliest opportunity and before rough sleeping becomes necessary.
22. The Homelessness and Rough Sleeping Action Group is also commissioning a consultant to provide further information on potential mechanisms for moving from the current 'Temporary Accommodation by default' to a 'rapid re-housing by default' system. This work will report in May 2018 and inform future reporting from the Action Group.

#### *Legislative elements*

23. The legislative framework must support the culture shift we are setting out. This includes all public bodies having a duty to take steps to prevent homelessness and to co-operate with each other to prevent homelessness. Local authorities should retain the primary duty to prevent homelessness, but with the full co-operation of other public bodies, including housing providers.
24. It will be important to address barriers to support, such as local connection and the concept of 'intentionally homeless', so they don't stop the prevention of homelessness. There is also a need to address the UK policy around those deemed to have No Recourse to Public Funds (NRPF) for this to work fully for all.

#### *Measuring and monitoring rough sleeping*

25. The Action Group is not recommending the introduction of street counts, but to use approaches that blend and triangulate measures across multiple sources to maximise coverage and accuracy.

26. The key recommendation is to develop a national 'CHAIN-type' system to integrate data on all rough sleepers in real-time by contact with all statutory and voluntary sector homelessness services – and to complement these sources with retrospective questions in household surveys (as used regularly in the Scottish Household Survey in Scotland), especially to capture rough sleepers using neither statutory or voluntary sector services, though we think these will be very few.
27. From this, a suite of accurate and frequent measures can be applied to the number, nature and distribution of rough sleeping which will be crucial to track and ensure progress to eradicating rough sleeping.
28. The recommendations set out in the next section are intended to be a package of actions that, taken together, will drive progress and help to sustain success in eradicating rough sleeping for good. Some of the actions set out will also be relevant to other groups of people who are homeless, and as such may be revisited or expanded upon as part of our forthcoming work on transforming the use of temporary accommodation and ending homelessness.

## **PART B: RECOMMENDATIONS**

### **Preventing people resorting to rough sleeping**

29. Against the background of extending housing rights and the phasing out of 'priority need' in Scotland in 2012, approaches to preventing homelessness have shifted significantly since 2010 with the adoption of 'housing options' by local authorities and their partners.
30. The approach has led to falling homelessness applications in Scotland and provides a strong foundation to build on. However, a continuing level of 34,100 applications a year in Scotland (2016/17) and a rise in both recorded and visible rough sleeping, indicates we need to go further and ensure early intervention and prevention of homelessness are embedded across public bodies in Scotland.
31. Effective prevention of rough sleeping (and indeed of wider homelessness) will require a cross sector, multi-agency response, backed by resource, utilising person centred approaches, existing evidence and legislative powers with the common national objective of ending rough sleeping in Scotland.
32. Front-line partners must include the police, NHS workers, prison staff, social care professionals and others so that they can play an increased role in adopting a targeted pathways approach to homelessness prevention.
33. This will be particularly important for people leaving institutions such as prison, care, armed forces or hospital, as well as victims of discrimination and/or abuse.
34. We also know that certain other groups of people will be at particular risk of homelessness. This means that we can anticipate potential risk areas and establish pathways to address what may not be 'predictable', but can be 'expected'. While 'particular groups' are identified below, we should avoid assumptions that people at risk of homelessness will fall into one particular group or can be defined by one particular issue:
  - Women who have experienced domestic abuse;
  - People who have experienced childhood poverty and/or childhood trauma or adverse experiences;
  - Young people;
  - People with addictions to alcohol and drugs;
  - Homeless people who are deemed to have 'no recourse to public funds';
  - People who have experienced relationship breakdown; and
  - People being evicted.
35. Recommendations on prevention pathways and housing options raise the issue of whether a legal duty to prevent homelessness, similar to Wales and latterly England, should be created. The Action Group considers that a strong message is required on prevention activity.

36. Potential legislative change is not only about the establishment of a prevention duty. In the context of considering how to achieve the best possible outcomes, particularly for those with the most complex needs, both intentionality and local connection provisions within Scottish homelessness legislation raise the issue of potential barriers within the system at the same time as more 'psychologically informed' approaches are being adopted on prevention.
37. When homelessness is predictable, we should prevent it. Public bodies (care, prison, mental health, armed forces) must not discharge people into homelessness and measures must also be put in place to identify and respond to the risk of becoming homeless at a later stage.
38. Specific responses should be adopted to prevent homelessness, multiple exclusion and disadvantage for groups such as women experiencing domestic abuse, LGBT young people, people experiencing relationship breakdown, and people migrating from outside or within Scotland.
39. Longer term measures should be taken to reduce child poverty, and the impact of adverse childhood experiences and trauma.
40. When people are at immediate risk of rough sleeping, we should prevent it. Housing Options can prevent homelessness by acting when and where the risk of homelessness occurs. Prevention is about stopping homelessness happening; it is not enough simply to discharge into temporary accommodation – mediation and support should be applied to stop homelessness happening in the first place.

**Recommendation 1: 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.

**Recommendation 2: Support staff with high quality training and support to respond as effectively as possible to prevent rough sleeping**

Ensure an easily understood and clear national training programme and ongoing accreditation to ensure needs of specific groups are addressed, and psychologically informed approaches adopted including more informed approaches on so called 'non engagement' – to be delivered to front line staff and made mandatory to staff in key roles, going beyond those working directly in housing and homelessness to incorporate all staff likely to come into contact with people who are rough sleeping or at risk of rough sleeping.

**Recommendation 3: 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 women who have experienced domestic violence, 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) 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.

**Supporting frontline services to respond to people rough sleeping or at risk**

41. People who are sleeping rough are likely to be experiencing a range of complex support needs and psychologically informed solutions need to be at the heart of any solution or intervention.

42. The Group has considered what we know from experience:

- History and evidence shows that assertive outreach approaches are important in enabling people to move off the streets at the earliest opportunity, but this requires those delivering the outreach to be able to take rapid action and needs to be achieved at the same time as recognising the complexity of need that might be involved;
- Recession and policy decisions (especially austerity, housing and social security reform) have had a significant impact on rough sleeping and homelessness, particularly in cities like Aberdeen, Edinburgh and Glasgow with high prevalence of the factors that create homelessness;

- The periods that followed the Rough Sleepers Initiative and Hostel Closure Programme proved we can reduce rough sleeping when our offer is better than the alternative;
- Most people are seeking a home as part of a safe and secure community - the best base to build and live their lives;
- Even the most multiply excluded people are ready for housing and can sustain mainstream housing when offered choice and the right wrap around support;
- To end the need to sleep rough, we need to rebalance how accommodation is provided: increasing access to mainstream housing, widening the range of housing options available and reducing our reliance on congregate forms of living;
- When we don't provide a strong enough option, people will get stuck in the system – or opt out of it altogether; and
- Political leadership and commitment and targeted resources works.

43. In addition to this, people with lived experience of homelessness have told us through the 'Aye we can' consultations that:

- Services should get involved earlier to avoid people losing/leaving their home;
- Better support and advice needs to be delivered when leaving places and more information about that support. Especially when leaving, hospital, prison, armed forces or care;
- Multiple needs response required from teams of staff who can provide support for all these needs and can act quickly; and
- Public (council and NHS) and third sector should work together better and get involved earlier to support people to avoid a crisis.

44. People with lived experience of homelessness also tell us that there is a need to respond better/more urgently and:

- Provide a permanent home with full, flexible support as quickly as possible and for as long as people want;
- Have high quality street outreach services to work with people sleeping rough, who get actively involved in improving people's lives;
- Make sure there is enough accommodation available that can be accessed immediately in emergency situations. There should be less barriers to accessing this accommodation;
- Make sure that staff in hostels/homeless accommodation are fully trained to work with people who have multiple needs including addictions, mental ill health and trauma to provide a strong, positive basis for recovery;
- Consider accommodation options for people with pets, or review any current rules that do not allow pets;
- Consider accommodation options for couples, or review any current rules that do not allow couples; and
- Make the homelessness system easier to navigate so that people can get the help they need when they need it rather than approaching the 'wrong' services and getting 'lost' in the system.

45. Evidence and learning from the actions recommended by the Action Group to minimise rough sleeping this winter highlights that strong flexible multi-agency partnership working providing a rapid and consistent response, appropriate to the needs of the person, is vital to finding viable solutions for people who sleep rough. Front-line staff involved in outreach work report that the quick and flexible action they are able to adopt through personalised budgets, rapid access to emergency accommodation and distribution of extreme weather provision is producing positive results in transitioning people away from rough sleeping.

46. It is important that the definition of front-line workers is broadened and there is recognition that it reaches beyond those working directly in housing and homelessness and should incorporate outreach and day centre workers, health and social care workers, NHS, police and prison staff, community safety personnel, DWP staff including Job Centre Plus, and food access points. Staff need to be aware of the impact of their roles on homelessness prevention, their ability to take action and how they can play a part in achieving positive outcomes for people who experience homelessness.
47. For people with complex needs we should also be adopting a rapid access to housing approach, such as Housing First, as evidence identifies this as a highly effective solution to both ending their rough sleeping and tackling the other support needs they have at the same time. Although, it is recognised that this is not a one-size-fits-all approach and there needs to be a range of intermediary low threshold or open access emergency accommodation options.
48. It is also essential to make direct contact with people who are at risk of or actively rough sleeping to understand their experiences and the complexities around their support needs, and prioritise responses based on individual need. The benefits of this are highlighted in reports from the winter actions work where emergency interventions with rough sleepers have built a level of trust that has led to long-term rough sleepers engaging with support workers and transitioning to accommodation options, some for the first time in many months or years. It is recognised that a shared approach to assessing need and vulnerability is required, with less use of concepts such as intentionality and local connection, and removal of benefits barriers to the provision that is needed to help extremely vulnerable people.
49. It is key also that front line support staff are fully trained, empowered and supported so that they can provide effective and appropriate solutions for the people they support, particularly those with multiple and complex needs i.e. who have experienced institutional care (prison, care, hospital); substance misuse; participation in street culture activities (begging, drinking, survival shoplifting or sex work); abuse, trauma, exploitation.

**Recommendation 4: Learn from what worked well this winter and ensure the benefits are harnessed for more effective interventions all year round**

Scottish Government and the relevant local authorities should review the success of the actions implemented to minimise rough sleeping this winter to identify innovations which have shown promise and which should continue in order to allow continued support to people sleeping rough, and learning to be gathered with a view to mainstreaming those interventions which can be shown to be cost effective in the long term.

**Recommendation 5: Ensure an effective evidence based approach to front line support which secures a successful, sustainable transition off the street as quickly as possible**

Scottish Government, together with partners, should develop a consistent national delivery model for front line outreach services to support more immediate, multi-disciplinary front line interventions for people sleeping rough - or at risk of doing so - to facilitate successful and sustained transition off the street.

The approach should be adopted nationally, but tailored to the local situation and drawing on learning from this year's winter actions and other evidence e.g. use of personalised budgets to support access to emergency accommodation and allow outreach workers to build relationships and

trust with people rough sleeping who have complex needs. Once approaches have been tested and demonstrated improved outcomes, they should be 'hardwired' into systems and processes.

This should:

- Include a multi-agency approach which empowers front line staff to be able to act to find emergency solutions for people sleeping rough, including a 'by name list' approach;
- Include flexibility in statutory services to enable rapid transition in certain circumstances, recognising that this might include changes to current allocation policies; and
- Ensure access to training and information (including that generated by the new data system covered by recommendation 18) to maximise effective support for individuals.

Local areas should be invited to model, and carry out, test of change initiatives to deliver immediate/direct access via non-statutory street/assertive outreach.

**Recommendation 6: Recognise that, while not necessarily rough sleeping, people who are engaged in street begging are also likely to need support with housing and will be, almost without exception, extremely vulnerable**

Scottish Government should review support to those who are at risk of rough sleeping, or who are in and out of emergency accommodation, and who are also involved in other street based activity, including street begging, with a view to developing a national approach, while recognising that not everyone who experiences rough sleeping is engaged in street begging and vice versa, and taking into consideration, where appropriate, work currently being undertaken by Street Begging strategy groups in Glasgow and Edinburgh, who have both commissioned research on Street Begging and what is effective in tackling the issue.

### **Ensuring access to appropriate housing and support**

50. 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 a combination of these.

51. 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.

52. 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; and
- Realistic: helping you tackle any financial hardship that caused your housing situation.

53. 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;
- If a congregate arrangement e.g. supported accommodation is appropriate, the size of the congregate/shared unit is important suggesting that the smaller the unit, the better the outcomes (though recognising that other factors, such as quality of support, are important too); and
- In general, a focus on mainstream tenancies rather than congregate units, with the right support (though recognising that for some, supported accommodation is a short-term need).

54. 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.

#### *A rapid rehousing approach*

55. The Action Group recommend a transition to a system where rapid rehousing is the default position for homeless households. 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).

56. 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 and temporary accommodation research will provide local systems analysis that will help expand recommendations for later work on temporary accommodation and ending homelessness.

57. The evidence supporting rapid rehousing models including Housing First is overwhelming. 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 support further development of Housing First in Scotland including Turning Point Scotland as early adopters, Social Bite's 600 Homes Campaign, set to be the UK's largest Housing First programme, and Housing First Transition Fund who are looking to test an approach to social investment to support transition and scale up of Housing First in Glasgow.

**Recommendation 7: 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.

**Recommendation 8: Ensure that people sleeping rough and experiencing multiple forms of exclusion are supported to secure permanent accommodation as quickly as possible, according to the best evidence available**

Scottish Ministers should announce a default to Housing First as part of a rapid rehousing model for people sleeping rough and experiencing multiple forms of exclusion. This expectation should be included in a revised Scottish Government Code of Guidance on Homelessness.

**Recommendation 9: Provide resource and oversight to ensure a successful transition to the rapid rehousing approach**

Scottish Government should create and resource additional capacity to drive Scotland's transition to rapid rehousing approaches and appoint a national delivery group, as a sub-structure of the Homelessness Prevention and Strategy Group, to:

- 1) monitor the rapid rehousing transition plans being developed in local areas; and
- 2) steer and support the scaling up of Housing First in Scotland.

**Recommendation 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).

**Recommendation 11: 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.

**Recommendation 12: Remove barriers to exercising choice in settled accommodation to break the cycle of recurrent rough sleeping**

Additional support, independent advice and advocacy should be factored as standard into online and choice based letting/bidding systems to eliminate the practical, language or literacy barriers to self-selecting settled accommodation.

*People deemed to have no recourse to public funds*

58. 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). As public funds include social security 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, a number of people who resort to rough sleeping are impacted by these restrictions and as such the Action Group felt it was important to consider this issue, while recognising that this is a complex issue which goes wider than access to housing.

59. 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; and
- A roundtable discussion on 14 February 2018. Hosted by Positive Action in Housing with participants 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, Glasgow Homelessness Network and the Glasgow Night Shelter.

60. In May 2017, a parliamentary inquiry published comprehensive findings on destitution, asylum and insecure immigration status in Scotland. The scope and recommendations of this inquiry were broadly endorsed during HARSAG's consultation with experts as described above.

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

62. 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.

**Recommendation 13: Put in place measures to provide protection to those without recourse to public funds**

Scottish Government should continue to work with COSLA and other partners to respond to findings from the Equalities and Human Rights Committee report on destitution to respond to the needs of homeless people and people at risk of homelessness who are deemed to have no recourse to public funds, and in the meantime should act on the following recommendations which follow from that

work:

- Funding for a preventative Independent Advocacy service, covering both people destitute through the asylum process and those EEA nationals who are without recourse; and
- Ensure robust input to the inspection of asylum accommodation currently ongoing across the UK which will inform the 2019-2029 accommodation contracts, with the aim of achieving better alignment with Scotland's legislative and policy context. This input 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.

### **Ensure legislation underpins the changes required to end rough sleeping**

63. Scotland has a strong rights-based legislative framework, which has shifted towards a more preventative approach in recent years, and has a system that is demonstrably capable of innovation and improvement. Building on this, and in light of the compelling international evidence about what works to eliminate rough sleeping and move people into settled circumstances, there is a need for some specific and targeted legislative reforms.

64. In addition to changes to statutory duties and guidance, real and lasting change will also require a focus on leadership, culture and the creation of a system that can identify and share best practice. However, there are a number of specific changes to the legislative framework the Action Group consider necessary to increase the focus on prevention, to make homelessness services in Scotland more responsive and flexible and to ensure high service standards that are consistent across the country.

### **Recommendation 14: 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.

65. We recognise the need for intentionality provisions to mitigate against perverse incentives, but the current formulation and practice of intentionality goes far beyond that and effectively works against people with complex needs. The Action Group recommends narrowing the definition to focus on instances of 'deliberate manipulation' of the homelessness system where the applicant actually foresees that their actions would lead to them becoming homeless. Even in these cases, there must be a bottom-line accommodation offer (as already legislated for in 2003).

66. Similarly with local connection, the Action Group recognises the need to distribute fairly the burden of tackling homelessness, but this needs to be achieved in a way that does not form a barrier to a solution being identified. We recommend consideration of the following options:

- (i) suspend or abolish local connection rules, but make provision for their reapplication by statutory instrument for specific local authority areas suffering undue pressure as a result of

net inward migration of applicants (this would require to be evidenced by research that monitors flows across boundaries);

(ii) suspend or abolish the local connection rules but make allowance for money/resources to 'follow people', so that applicants can apply as homeless wherever they wish to but local authorities can reclaim costs from each other where they accept applicants whose local connection lies elsewhere; and

(iii) Improve the operation of the current local connection rules by being more humane/realistic about how and when people have established a local connection.

**Recommendation 15: 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.

67. One thing that the additional efforts to minimise rough sleeping this winter has shown is that there is a significant cohort of people who, for various reasons, are deemed to have no recourse to public funds (NRPF). This can lead to destitution and rough sleeping, and there can be confusion as to what support local authorities can and cannot offer. In order to clarify matters, and to empower local authorities to support people in their local area experiencing destitution, the Group recommends that the Scottish Government develops a definitive statement of responsibilities for this group of people, and that it adds this material to the revised Code of Guidance).

**Recommendation 16: Clarify the protection to be afforded to those without recourse to public funds**

Scottish Government should clarify in the Code of Guidance the role and responsibility of local authorities to support people who are deemed to have no access to public funds (so-called NRPF). This should be considered alongside the wider recommendations set out above for those with no recourse to public funds.

68. There is currently no single source of guidance for Local Authorities seeking to implement best practice in homelessness services. Section 37(1) of the 1987 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 on Homelessness provides such guidance and should be used as a supporting document for local authority staff in carrying out relevant activities and discharging

their responsibility. Whilst this statutory guidance remains useful, certain elements of it are out of date or have been superseded by the current non-statutory guidance on Housing Options.

69. In order to strengthen requirements on local authorities to follow best practice in homelessness services, and clarify the guidance, the Group recommends that the Code of Guidance be brought up to date, and that a process is established to keep it up to date.

**Recommendation 17: Update the Code of Guidance**

Amend and update Scottish Code of Guidance on Homelessness to reflect both existing non-statutory guidance on Housing Options and any new legislative requirements, and ensure the Code is updated regularly to reflect such changes. Also consider impact of the recommendations on the Regulatory Framework.

**Ensure data is collected to support better services and track progress to ending rough sleeping**

70. We know a key issue for people interacting with the system is better join up between services, and information sharing is key to doing that well. Current data collection and recording on rough sleeping does not support joint working at the case level, and is not complete enough to be as effective as it could be in service or policy planning and design, or on tracking trends and measuring the impacts of policy and practice change.
71. Better management information can ultimately lead to better outcomes for people experiencing rough sleeping and homelessness, including a more efficient and less traumatic passage through the system, better system design and better policy design. Good data are key to communicating the problem, developing the solution and monitoring and managing progress. A robust suite of information on the complete picture of rough sleeping and, ideally, broader homelessness in Scotland is required to support progress.
72. For the individual, we are seeking to facilitate faster progress through the system towards more personalised rapid rehousing outcomes, and to improve the system as a whole by providing data to support policy development and evaluation. This is an ambition endorsed by the Local Government and Communities Committee in their recent report, though where they advocate better use of the existing data and best practice sharing between local authorities, we are suggesting the existing framework cannot produce the right information in the right way to facilitate joint working or provide a complete picture of rough sleeping in Scotland.
73. The current system of data collection and management needs to change in order to support that because:
- Data do not facilitate inter-agency working on a case by case basis; and
  - It is an incomplete and inaccurate picture, with single sector data sets skewing our understanding and, potentially, misleading us into poor policy choices.
74. A new solution needs to:
- Allow data to be collected and integrated from multiple, cross-sector contributors (ideally both voluntary and statutory sectors);

- Underpin joined up working by facilitating data sharing, including supporting a named list approach;
- Provide sufficient nuance to capture data on different subgroups of rough sleepers/homeless people, to facilitate service management and policy development and planning, and monitoring and evaluation of interventions;
- Enable de-duplication of records, within and across sectors (via use of unique identifiers);
- Enable a measurement of people with no recourse to public funds;
- Provide datasets in such a way as to allow reporting to Parliament, to facilitate scrutiny and hold the Scottish Government to account for its progress; and
- Build on best practice from around the UK.

75. A new solution could be an opportunity to:

- Create a better data capture solution for all homelessness measures in Scotland, including things like sofa surfing and those in unsuitable temporary accommodation; and
- Create a suite of evidence which can be used by system designers and policy advisors in many different areas of the public and voluntary sectors.

76. It will be key for any new database to generate statistical information on the number and nature of the individuals recorded in it, together with useful reports e.g. around the length of time taken to move to settled accommodation. To ensure maximum impact, these data should be reported to the Scottish Parliament in order to help them hold the Scottish Government and partners to account for progress made towards ending rough sleeping. However, HARSAG does not believe we should be seeking to set targets using these data, as this can lead to a culture of chasing the target at the expense of the individuals involved.

77. A new system of this type will take time to develop and implement. In the interim and as part of an overall options appraisal, the Scottish Government should investigate other ways in which the existing data could be enhanced, both in terms of collection and use, seeking to generate both improved service provision and better monitoring and evaluation data in the short to medium term. Alternative indirect approaches to estimating rough sleeping and other forms of 'core' homelessness can be utilised, both as an interim measure pending the development of a new data collection approach, and as an ongoing cross-check on such a system.

78. A long-running set of questions in the Scottish Household Survey (SHS) ask adults about retrospective experiences of homelessness, with a particular focus on the last two years. There is a specific question on rough sleeping which can be triangulated against the HL1 returns (given questions about whether respondents applied to the local authority). There is a duration question which is critical to getting to an average nightly rough sleeping estimate. Adjustments can/should be made for those adults not currently in private households. The downside is that the SHS is only updated annually, and somewhat in arrears, and is only taken from a sample of households. Therefore, it is not ideal for monitoring the latest trends or the detail of what is happening in particular localities. Unfortunately, too, the homelessness questions were dropped from the SHS from 2015/16.

**Recommendation 18: Improve the approach to data collection for people rough sleeping to maximise effectiveness of support provided through multi-agency working and to understand and assess progress to reducing rough sleeping**

Scottish Government should implement a solution similar to the CHAIN system used in London, to support two aims of HARSAG: (i) real-time 'by name' data sharing between the agencies working with people who are rough sleeping or at risk of rough sleeping; and (ii) enabling frequent and

regular reporting of numbers, locations and other data to support monitoring the reduction in rough sleeping across Scotland.

This should build on the work being undertaken by the Centre for Homelessness Impact to develop an outcomes framework for homelessness and rough sleeping in Scotland, which should be extended to include an options appraisal to determine the detailed requirement of a national 'CHAIN-like' system.

Enabled by such a system, a set of clear metrics should be developed to enable effective monitoring of progress towards ending rough sleeping.

**Recommendation 19: Ensure data collections reflect increased priority now being given to homelessness reduction**

Re-instate the homelessness questions in the SHS, given the high policy priority attached to this topic.

**Recommendation 20: Facilitate scrutiny of progress towards ending rough sleeping in Scotland**

Based on the agreed metrics, the Minister for Local Government and Housing should provide a regular report to the Scottish Parliament to facilitate scrutiny of progress towards ending rough sleeping in Scotland.

## CONCLUSION AND NEXT STEPS

79. Ending rough sleeping for good is a bold and important ambition, which will have significant impact on individuals and communities as well as contributing to the wider aims of Scottish Government for a fairer and more inclusive society and a stronger economy.

80. Preventing rough sleeping from taking place will require action across the public sector; responding well when it happens will rely on empowered and effective outreach and a transformed, housing-led response which quickly meets people's needs. A legislative framework that supports the changes needed, and an effective data collection system that both supports interventions and tracks our collective progress will provide the framework for change to take place.

81. We present these recommendations to the Scottish Government and look to them, together with the Homelessness Prevention and Strategy Group, to set out how they will learn from early actions to tackle rough sleeping in winter 2017/18 to establish a sustained programme of transformational change that will move to end rough sleeping for good.

82. We will now continue our work to address the further questions set to us by Scottish Government; how to transform the use of temporary accommodation and how to end homelessness.

*To note, an Equality Impact Assessment (EQIA) will be taken on these recommendations to ensure that people with characteristics protected under equalities legislation are not disadvantaged or discriminated against. This will include consulting with specialist groups including Scottish Women's Aid and LGBT Youth Scotland.*

**Homelessness and Rough Sleeping Action Group**

**March 2018**

ANNEX A: Full table of recommendations

Ref	Final recommendation	HARSAG work-stream
1	<p><b>Ensure local authorities and public bodies work together to prevent rough sleeping at every opportunity</b></p> <p>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.</p>	
2	<p><b>Support staff with high quality training and support to respond as effectively as possible to prevent rough sleeping</b></p> <p>Ensure an easily understood and clear national training programme and ongoing accreditation to ensure needs of specific groups are addressed, and psychologically informed approaches adopted including more informed approaches on so called ‘non engagement’ – to be delivered to front line staff and made mandatory to staff in key roles, going beyond those working directly in housing and homelessness to incorporate all staff likely to come into contact with people who are rough sleeping or at risk of rough sleeping.</p>	
3	<p><b>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</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>• People leaving public institutions such as prison, mental health services, armed forces;</li> <li>• People with previous experience of public institutions such as prison, mental health services, armed forces;</li> <li>• Groups with particular needs such as women who have experienced domestic violence, migrants, asylum seekers, refugees, people experiencing relationship breakdown, LGBT groups and people with experience of the care system or on leaving the care system;</li> <li>• People who have experienced or are experiencing poverty and/or adverse childhood experiences; and</li> <li>• Those facing potential eviction from the private rented sector, or the social rented sector including particular approaches on rent arrears.</li> </ul> <p>Where this exists (e.g. SHORE standards for prisoners) SG 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>	
4	<p><b>Learn from what worked well this Winter and ensure the benefits are harnessed for more effective interventions all year round</b></p>	

	<p>Scottish Government and the relevant local authorities should review the success of the actions implemented to minimise rough sleeping this Winter to identify innovations which have shown promise and which should continue in order to allow continued support to people sleeping rough, and learning to be gathered with a view to mainstreaming those interventions which can be shown to be cost effective in the long term.</p>	
5	<p><b>Ensure an effective evidence based approach to front line support which secures a successful, sustainable transition off the street as quickly as possible</b></p> <p>Scottish Government, together with partners, should develop a consistent national delivery model for front line outreach services to support more immediate, multi-disciplinary front line interventions for people sleeping rough - or at risk of doing so - to facilitate successful and sustained transition off the street.</p> <p>The approach should be adopted nationally, but tailored to the local situation and drawing on learning from this year’s winter actions and other evidence e.g. use of personalised budgets to support access to emergency accommodation and allow outreach workers to build relationships and trust with people rough sleeping who have complex needs. Once approaches have been tested and demonstrated improved outcomes, they should be ‘hardwired’ into systems and processes.</p> <p>This should:</p> <ul style="list-style-type: none"> <li>- Include a multi-agency approach which empowers front line staff to be able to act to find emergency solutions for people sleeping rough, including a ‘by name list’ approach;</li> <li>- Include flexibility in statutory services to enable rapid transition in certain circumstances, recognising that this might include changes to current allocation policies; and</li> <li>- Ensure access to training and information (including that generated by the new data system covered by recommendation 18) to maximise effective support for individuals</li> </ul> <p>Local areas should be invited to model and carry out test of change initiatives to deliver immediate/direct access via non-statutory street/assertive outreach</p>	
6	<p><b>Recognise that, while not necessarily rough sleeping, people who are engaged in street begging are also likely to need support with housing and will be, almost without exception, extremely vulnerable</b></p> <p>Scottish Government should review support to those who are at risk of rough sleeping, or who are in and out of emergency accommodation, and who are also involved in other street based activity, including street begging, with a view to developing a national approach, while recognising that not everyone who experiences rough sleeping is engaged in street begging and vice versa, and taking into consideration, where appropriate, work currently being undertaken by Street Begging strategy groups in Glasgow and Edinburgh, who have both commissioned research on Street Begging and what is effective in tackling the issue.</p>	
7	<p><b>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</b></p> <p>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"> <li>- Someone who is rough sleeping or at risk of rough sleeping should be housed in settled mainstream accommodation as quickly as possible;</li> <li>- 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</li> <li>- 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.</li> </ul>	
8	<p><b>Ensure that people sleeping rough and experiencing multiple forms of exclusion are supported to secure permanent accommodation as quickly as possible, according to the best evidence available</b></p> <p>Scottish Ministers should announce a default to Housing First as part of a rapid rehousing model for people sleeping rough and experiencing multiple forms of exclusion. This expectation should be included in a revised Scottish Government Code of Guidance on Homelessness.</p>	
9	<p><b>Provide resource and oversight to ensure a successful transition to the rapid rehousing approach</b></p> <p>Scottish Government should create and resource additional capacity to drive Scotland's transition to rapid rehousing approaches and appoint a national delivery group, as a sub-structure of the Homelessness Prevention and Strategy Group, to:</p> <ol style="list-style-type: none"> <li>1) monitor the rapid rehousing transition plans being developed in local areas; and</li> <li>2) steer and support the scaling up of Housing First in Scotland.</li> </ol>	
10	<p><b>Ensure people have a range of different options at point of crisis to support them to avoid resorting to rough sleeping</b></p> <p>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).</p>	
11	<p><b>Continue to ensure an adequate and affordable social housing supply</b></p> <p>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.</p>	
12	<p><b>Remove barriers to exercising choice in settled accommodation to break the cycle of recurrent rough sleeping</b></p> <p>Additional support, independent advice and advocacy should be factored as standard into online and choice based letting/bidding systems to eliminate the practical, language or literacy barriers to self-selecting settled accommodation.</p>	
13	<p><b>Recommendation 13: Put in place measures to provide protection to those without</b></p>	

	<p><b>recourse to public funds</b></p> <p>Scottish Government should continue to work with COSLA and other partners to respond to findings from the Equalities and Human Rights Committee report on destitution to respond to the needs of homeless people and people at risk of homelessness who are deemed to have no recourse to public funds, and in the meantime should act on the following recommendations which follow from that work:</p> <ul style="list-style-type: none"> <li>• Funding for a preventative Independent Advocacy service, covering both people destitute through the asylum process and those EEA nationals who are without recourse; and</li> </ul> <p>Ensure robust input to the inspection of asylum accommodation currently ongoing across the UK which will inform the 2019-2029 accommodation contracts, with the aim of achieving better alignment with Scotland’s legislative and policy context. This input 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.</p>	
14	<p><b>Ensure legislation provides sufficient support for shift to significantly greater levels of prevention</b></p> <p>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.</p>	
15	<p><b>Revise legislative arrangements that can result in difficulties with people being able to access their rights</b></p> <p>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.</p>	
16	<p><b>Clarify the protection to be afforded to those without recourse to public funds</b></p> <p>Scottish Government should clarify in the Code of Guidance the role and responsibility of local authorities to support people who are deemed to have no access to public funds (so-called NRPF). This should be considered alongside the wider recommendations set out above for those with no recourse to public funds.</p>	
17	<p><b>Update the Code of Guidance</b></p> <p>Amend and update Scottish Code of Guidance on Homelessness to reflect both existing non-statutory guidance on Housing Options and any new legislative requirements, and ensure the Code is updated regularly to reflect such changes. Also consider impact of the recommendations on the Regulatory Framework.</p>	
18	<p><b>Improve the approach to data collection for people rough sleeping to maximise effectiveness of support provided through multi-agency working and to understand and assess progress to reducing rough sleeping</b></p> <p>Scottish Government should implement a solution similar to the CHAIN system used in London, to support two aims of HARSAG: (i) real-time ‘by name’ data sharing between the agencies working with people who are rough sleeping or at risk of rough sleeping; and (ii)</p>	

	<p>enabling frequent and regular reporting of numbers, locations and other data to support monitoring the reduction in rough sleeping across Scotland.</p> <p>This should build on the work being undertaken by the Centre for Homelessness Impact to develop an outcomes framework for homelessness and rough sleeping in Scotland, which should be extended to include an options appraisal to determine the detailed requirement of a national 'CHAIN-like' system.</p> <p>Enabled by such a system, a set of clear metrics should be developed to enable effective monitoring of progress towards ending rough sleeping.</p>	
19	<p><b>Ensure data collections reflect increased priority now being given to homelessness reduction</b></p> <p>Re-instate the homelessness questions in the SHS, given the high policy priority attached to this topic.</p>	
20	<p><b>Facilitate scrutiny of progress towards ending rough sleeping in Scotland</b></p> <p>Based on the agreed metrics, the Minister for Local Government and Housing should provide a regular report to the Scottish Parliament to facilitate scrutiny of progress towards ending rough sleeping in Scotland.</p>	

**Key: HARSAG workstreams**

Legal reform	
Access to accommodation	
Prevention	
Front line support	
Measurement	