Ending Homelessness

The report on the final recommendations of the Homelessness and Rough Sleeping Action Group

INTRODUCTION

Many aspects of ending homelessness in Scotland have been addressed in the first three reports from the Homelessness and Rough Sleeping Action Group (HRSAG). All of the work to date has been informed by discussions with more than 400 people with recent or current experience of homelessness, from across Scotland.

This approach is not only the right thing to do, but has also clearly enabled the HRSAG to work quickly to develop coherent and workable recommendations evidenced in the impact they will have on the lives of people experiencing homelessness or at risk of homelessness. It is the view of the HRSAG that this approach should continue to be fostered across sectors, nationally and locally. The best evidence should be brought together with expertise within local authorities and delivery partners to inform planning decisions and operational activity of front-line services. This should include both the academic rigour of comprehensive studies and evaluations and co-production with the people directly affected by homelessness Organisations and networks such as the Scottish Co-production Network, SHIEN (Scottish Homelessness Improvement and Empowerment Network), and the Frontline Network have an important role to play in bringing people's experiences to the forefront.

The strength of the current homelessness system in Scotland, including the rights based approach of homelessness legislation and the Housing Options approach to prevention, give a strong basis on which to build improvement and ensure the system achieves the best possible outcomes for people who are at risk of, or experiencing, homelessness. Thousands of people are supported through this system every year, yet significant numbers of people still live for long periods in temporary accommodation, experience repeat homelessness and people still resort to rough sleeping which tells us that there is much more that we can, and need, to do. In the context of the strengths of the current system, the current political and public awareness and scrutiny, and money being made available by the Scottish Government for system transformation, the time is right to tackle the challenges to ensure that everyone has a home.

One particular theme to be addressed systemically is one of raising expectations and the accountability of all organisations working with people experiencing homelessness or at risk of homelessness. People have a right to housing, health and fairness, but the Aye We Can work with more than 400 people with experience of homelessness repeatedly reported low expectations; people not asking for much and a recurring theme of lost confidence and self-esteem. We all have a stake in addressing this.

Related to this is the overarching need to invest in front-line services and the staff who support people day-in-day-out to move out of homelessness. Front-line staff across housing, homelessness and the wider public and third sector, should be seen as partners in the discussions and decisions that affect people who are at risk of homelessness, and recognise the important role they have around early intervention and prevention of homelessness. The culture we are proposing places the homeless person or household at the centre and ensures that all professionals are working together in the interests of that person not becoming homeless or having their homelessness resolved quickly and sustainably if they do become homeless.

The first HRSAG report addressed the pressing need to reduce rough sleeping in what was then the forthcoming winter of 2017/18. This phase of work was informed by HRSAG member experience and expertise and by rapid engagement with frontline outreach and local authorities in the largest cities,

as well as research which has been undertaken by ISPHERE, Heriot Watt for Social Bite *Eradicating Core Homelssness in Scotland's largest cities[1]*. The focus of these recommendations was on the extension of emergency provision, facilitating more joined-up working between established agencies working with people who were sleeping rough in the largest cities so they could respond quickly to the needs of people there and then, and to empower front-line workers to deliver truly personalised services, including provision of personalised budgets to enable both emergency provision and psychologically-informed relationship building with people who were sleeping rough. It also involved addressing gaps in provision, for example by providing an assertive outreach team in Aberdeen.

The second report looked at the solutions to rough sleeping in Scotland. A large part of this report considered prevention; ensuring the successful Housing Options model is available for everyone all of the time and on their terms. This was about ensuring that those people who do not access Housing Options (or who Housing Options doesn't reach) gain the benefits of that model.

Alongside this, a major element of tackling rough sleeping was to work with local authorities to transition to a 'rapid re-housing by default' model, whereby the priority and default solution for people who are homeless or at risk of homelessness is to move them into mainstream, settled accommodation as quickly as possible. For those people with complex support needs, the rapid re-housing response would be Housing First; and for those people who by choice or through particular need (their safety, the safety of others) would not initially benefit from a mainstream, settled housing situation, the HRSAG made recommendations about the nature of temporary and emergency solutions.

In addition to recommending a transition to rapid re-housing by default, the HRSAG also commissioned work to develop a toolkit to support local authorities in developing Rapid Re-housing Transition Plans.

This report followed many of the recommendations from the recent report led by Peter Mackie (Cardiff University) with Sarah Johnsen & Jenny Wood (I-SPHERE, Heriot-Watt) on the international evidence about what works in tackling rough sleeping. Some clear recommendations were made about the legal framework to enable effective prevention – a homelessness prevention duty to be applied to all public and front-line bodies placing the emphasis on prevention with a 'no wrong door approach'; abolishing local connection; and abolishing the concept of 'intentionally homeless' as a reason for not supporting someone (while recognising there may still need to be a recognition of people intentionally abusing the system to gain an advantage).

The third report was about transforming the use of temporary accommodation. The fundamental recommendation was about significantly reducing the use of temporary accommodation by reducing overall demand – by preventing homelessness in the first place, and ensuring the supply of housing both for social rent and for private rent is adequate to enable a default to rapid re-housing. The HRSAG went on to say that where temporary accommodation is necessary, it should be of a good standard, well regulated, and time limited – and that people who needed or chose periods in temporary accommodation would be well supported from 'day one' in accessing suitable temporary accommodation, while using temporary accommodation, and in moving on from temporary accommodation

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[1] http://social-bite.co.uk/wp-content/uploads/2018/01/EradicatingCoreHomelessness.pdf

As a final, crucial, element of transforming temporary accommodation, the HRSAG recognised the limitations of the current approach to funding the rent for temporary accommodation. Rents need to be low enough to not form a barrier to moving on or gaining employment. For this to happen there needs to be local freedom for local areas to set Local Housing Allowance rents, with the money devolved to local authorities (albeit ring-fenced). This recommendation included the inherent complexity that the funding and responsibility for temporary accommodation sits with Housing Benefit, which is reserved to UK Government. However, the recommendations around rents and funding remain important recommendations that would enable local areas to address this crucial element of people moving on from temporary accommodation and out of homelessness.

All of the work on temporary accommodation was informed by the report, 'Temporary Accommodation in Scotland: Interim Report' by Mandy Littlewood, Beth Watts and Janice Blenkinsopp at the Institute for Social Policy, Housing and Equalities Research, Heriot Watt University.

This fourth report is about ending homelessness in Scotland. The legal definition of homelessness is set out in the 1987 Housing (Scotland) Act as amended, included below for reference[2].

Definition of Homeless persons and persons threatened with homelessness from 1987 Housing (Scotland) Act, updated in the 2001 Housing (Scotland) Act

Homeless persons and persons threatened with homelessness.
(1)A person is homeless if he has no accommodation in **[F1**the United Kingdom or elsewhere**]**.

(2)A person is to be treated as having no accommodation if there is no accommodation which he, together with any other person who normally resides with him as a member of his family or in circumstances in which the local authority consider it reasonable for that person to reside with him—

(a)is entitled to occupy by virtue of an interest in it or by virtue of an order of a court, or

(b)has a right or permission, or an implied right or permission to occupy, or in England and Wales has an express or implied licence to occupy, or

(c)occupies as a residence by virtue of any enactment or rule of law giving him the right to remain in occupation or restricting the right of any other person to recover possession.

[F2

(2A)A person shall not be treated as having accommodation unless it is accommodation which it would be reasonable for him to continue to occupy.
(2B)Regard may be had, in determining whether it would be reasonable for a person to continue to occupy accommodation, to the general circumstances prevailing in relation to housing in the area of the local authority to whom he has applied for accommodation or for assistance in obtaining accommodation.**]**

(3)A person is also homeless if he has accommodation but—

(a)he cannot secure entry to it, or

(b)it is probable that occupation of it will lead to violence from some other person residing in it or to threats of violence from some other person residing in it and likely to carry out the threats, or

[F2(bb)it is probable that occupation of it will lead to—

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[2]http://www.legislation.gov.uk/ukpga/1987/26/section/24

(i)violence; or

(ii)threats of violence which are likely to be carried out,

from some other person who previously resided with that person, whether in that accommodation or elsewhere, or**]**

(c)it consists of a movable structure, vehicle or vessel designed or adapted for human habitation and there is no place where he is entitled or permitted both to place it and to reside in it; or

(d)it is overcrowded within the meaning of section 135 and may endanger the health of the occupants **[F3**; or

(e)it is not permanent accommodation, in circumstances where, immediately before the commencement of his occupation of it, a local authority had a duty under section 31(2) in relation to him.**]**

(4)A person is threatened with homelessness if it is likely that he will become homeless within **[F4**2 months**].**"

This covers a range of circumstances and the report recently published by Crisis *Everybody in: how to end homelessness in Great Britain*[3] outlined a further set of definitions, which are contained in the Scottish legislation, as:
- No one sleeping rough
- No one forced to live in transient or dangerous accommodation such as tents, squats and non-residential buildings
- No one living in emergency accommodation such as shelters and hostels without a plan for rapid rehousing into affordable, secure and decent accommodation
- No one homeless as a result of leaving a state institution such as prison or the care system
- Everyone at immediate risk of homelessness gets the help they need to prevent it happening

The structure of this document

This document builds on the first three reports and draws together additional recommendations in the following areas:
- Addressing wider causes of homelessness
- Early intervention with high risk groups
- Effective responses to those facing crisis
- Wider societal and government approach to homelessness

This report does not provide a silver bullet or panacea for ending homelessness, but it does add to the earlier HRSAG reports and set out a number of specific recommendations and more general direction of travel that will support the Scottish Government in its ambition to end homelessness in Scotland.

ADDRESSING THE WIDER CAUSES OF HOMELESSNESS

Homelessness does not exist in a vacuum in Scotland, or anywhere else. There are wider policies and issues that increase the likelihood of homelessness. These need to be addressed by government, by

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[3] https://www.crisis.org.uk/ending-homelessness/the-plan-to-end-homelessness-full-version/executive-summary/

local authorities and other public bodies, and by society at large. Some of these are in the gift of the Scottish Government and others determined by social and economic policies for the UK and beyond.

It is beyond HRSAG's brief to be able to solve all of these things. However, we encourage the Scottish Government to work with all partners and stakeholders to act to reduce the wider risks of homelessness, as well as taking action to tackle it when it does occur.

Above all known risk factors is wider poverty and inequality, and especially poverty in childhood. Housing and welfare policies can exacerbate (or ameliorate) the impact of these risk factors and can cause (or prevent) homelessness:

- Decisions about social security have a direct impact on homelessness. The poverty resulting from benefit caps and freezes, the impact of sanctions on people who are homeless or at risk of homelessness, the limits on the housing element of benefits, and waiting times for Universal Credit, and other aspects of welfare reform all act to increase the pressure on people living on the edge of homelessness;
- The limit on the supply of truly affordable housing inescapably drives homelessness, whether nationally or more locally. The supply of affordable or social housing is an essential element of any plan to end homelessness;
- Policies which serve to exclude migrant homeless people from the support they need.

Given the importance of tackling wider risks and causes of homelessness in order to achieve the aim of ending homelessness, we put forward a number of recommendations to support the Scottish Government in tackling these issues.

1.1   Poverty

Above all other factors, homelessness is a result of poverty. To end homelessness, we need to ensure both the long-term drivers and the short and long-term impacts of poverty are addressed.

Given the limited timeframe, the HRSAG has not examined the action needed in this area in depth, and points at the role of the Poverty & Inequality Commission as the key driver for change in this area. We would recommend that the Commission places a clear focus on the prevention of homelessness as part of its ongoing work. The Commission provides independent advice to ministers and has a strong scrutiny role in monitoring progress towards tackling poverty and inequality. It also has an advocacy role to help bring about real reductions in poverty and inequality in Scotland.

For example, in its advice to the Scottish Government on the Child Poverty Delivery Plan – which were taken on board in the published plan *Every Child Every Chance*[4] -, the Commission highlights key issues of direct relevance to homelessness:

| Work and earnings | The Commission recommends that the Child Poverty Delivery Plan should include action to support parents into employment and to address in-work poverty. This should take account of issues such as wages, hours, security, training, quality and opportunities to progress. The Commission recommends that the Delivery Plan should address how childcare and training can support employment for parents. The Delivery Plan should also set out how wider |

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[4] http://www.gov.scot/Publications/2018/03/4093

	economic policy, such as the Inclusive Growth agenda and City Deals, will contribute to delivering the child poverty targets.
Social Security	The Commission endorses the Scottish Government's commitment to creating a new social security system based on dignity, respect and fairness. It recommends that the Delivery Plan should set out the extent to which the Scottish Government intends to use the Social Security Powers to meet the child poverty targets and the options that it will consider over the period to 2030 to top up or create benefits. The new Social Security Agency should be established in such a way that it can deliver the top up benefits or new benefits that are needed to tackle child poverty.
Housing	Action to address housing costs has to be part of the plan to reach the child poverty targets and there is scope for additional action on housing costs, particularly in the private and social rented sectors. The Commission recommends that the Delivery Plan should explore ways of reducing housing costs for families with children living in poverty and that the prioritisation of building new homes for social rent should be continued. Work on housing supply should take account of accessibility of housing as well as supply. The Scottish Government should commit to monitoring and evaluating the impact of the changes introduced by the new Private Residential Tenancy and rent pressure zones on child poverty and consider whether further action may be needed to limit rent increases in the private rented sector.

These recommendations are consistent with the views of the HRSAG, and it is recommended that the Commission build on these and bring forward advice linked to reducing homelessness by addressing poverty and inequality as the most significant drivers and predictors of homelessness.

More specifically, the HRSAG recommends the following steps which link to previous recommendations:-

Recommendation 1: The Rapid Re-housing Transition Plans which are recommended by the HRSAG in relation to both ending rough sleeping and transforming the use of temporary accommodation must include an Equalities Impact Assessment which will cover all protected characteristics, and additionally assess impact according to 'socio-economic status'.

Recommendation 2: The Personal Housing Plans which are at the heart of the response to individuals at risk of homelessness will need to be sensitive to all forms of inequality, but especially need to consider 'financial hardship' as an additional aspect, so we are not inadvertently trying to resolve a housing and/or support need and at the same time pushing someone further into poverty or destitution.

2.2 Welfare reform

In making recommendations on welfare reform and social security to the Scottish Government, the HRSAG is mindful that the powers in this area remain reserved to the UK Government and that the Scottish Government only have limited levers at their disposal to be able to mitigate against the impacts of the decisions made by the UK Government. However, it is clear that irrespective of where the policy responsibility lies, changes to the social security system are needed to reduce the risk of homelessness and improve outcomes for homeless people in Scotland.

The social security offer for housing needs to be sufficient so that people at risk of homelessness can afford somewhere to live – whether in the private, public or social sector. This is a fundamental element of preventing homelessness in the first place and ensuring that episodes of homelessness are brief, and non-recurrent, where it does happen.

Recommendation 3: to ensure the social security offer supports households to avoid homelessness and to exit homelessness as quickly as possible when it does occur. As key elements of this, we recommend Scottish Government examine the case and pursue changes for the following:

- The way Local Housing Allowance is calculated needs to be reformed, raised to the 30th percentile everywhere, as well as being uprated on a regular basis
- The overall Benefit Cap needs to be raised and the benefit freeze ended so that households are not forced into destitution – this is especially true for single people in younger age groups who are particularly vulnerable to homelessness and destitution as a group
- With the introduction of Universal Credit, deduction rates for advances, arrears, overpayments and all other third party deductions should be reduced; exemptions for the Shared Accommodation Rate need to be extended; and the 5-week waiting time needs to be removed as this creates arrears right from the start
- There should be independent Housing/Homelessness specialists in Job Centre Plus with funding available to be made available to existing advice providers rather than directed by the Department for Work & Pensions (DWP)
- Work Capability Assessment to include homelessness as a 'supplementary descriptor'.
- DWP to assess the likely impact of a benefit or social security sanction before issuing and sanctions should <u>not</u> be issued unless the DWP can satisfy itself that it will not cause homelessness

These recommendations on welfare reform are additional to the previous recommendations made by the HRSAG about the funding of Temporary Accommodation, namely:

Recommendations from previous reports
- 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.
- 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.
- 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.
- 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.
- 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.

2.3   Housing Supply

The HRSAG has previously made a recommendation on housing supply.

> ***Recommendations from previous reports***
> **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.

This cannot be under-estimated as a prerequisite to any plan to end homelessness. Research published in September 2015, *Affordable Housing Need in Scotland*, commissioned by Shelter Scotland, SFHA and CIH Scotland and conducted by independent researchers from St Andrew's University, Sheffield Hallam University and Sheffield University[5] concluded that Scotland needs to build 12,000 affordable homes each year over the five year lifetime of this current parliamentary term, with the bedrock of this being a focus on socially rented homes. A recent report by Crisis and the National Housing Federation estimated that 100,000 homes for social rent will need to be built across Great Britain each year for the next 15 years to meet demand and prevent homelessness.. Research undertaken by Indigo House, commissioned by Social Bite on behalf of HRSAG suggests a 45% increase is needed in Local Authority and Housing Association lets to homeless households across Scotland . It will be important that change in allocations approaches consider unintended adverse consequences and an assessment will need to be made of impact on other groups. This is discussed further at section 4.1

Our strengthened recommendation is:

> **Recommendation 4**: *Scottish Government, local authorities and Registered Social Landlords should continue to ensure an adequate affordable and social housing supply to tackle immediate needs,* ***including a commitment to continue investing at comparable levels in affordable social housing beyond the current programme to safeguard supply in the longer term.*** *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.*

2.4   Migrant Homelessness

The HRSAG clearly recognises that the question of homelessness among people who have moved to the UK needs to be tackled for any plan to end homelessness to be effective. As with social security, we recognise the Scottish Government is limited in its ability to mitigate decisions taken by the UK Government, but the needs of this group must be addressed.

Again given the constraints of this working group's timescales, the HRSAG does not have a comprehensive set of recommendations on migrant homelessness. However, earlier

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[5]https://scotland.shelter.org.uk/__data/assets/pdf_file/0010/1190872/7909_Summary_Housing_Needs_Research.pdf

recommendations from the HRSAG about legal reform, including a duty on public and other front-line bodies to prevent homelessness, must be interpreted as to assume that they include migrant homeless people who are in the country legally. Those recommendations should also be interpreted to include Immigration Detention Centres and Asylum Seeker Accommodation in their definition of public bodies, so that these services have duties on them to prevent homelessness. Scottish Government should clarify possible mechanisms to achieve this, including with the Home Office, in the course of development of the legislation.

We welcome the fact that support for newly recognised refugees is in place through the Scottish Refugee Council and others. Such support to ensure newly recognised refugees have support to access housing, education, social security and the job market will continue to be crucial.

Recommendation 5: We recommend that other priorities on preventing migrant homelessness will need to include:
- Ensure that an assertive outreach model is available to provide personalised support, including the need for access to immigration and legal advice services and the need for employment support – recognising the need to operate within current rules on providing immigration and legal advice
- Reinstate entitlement to Housing Benefit or the housing element of Universal Credit for EEA nationals with 'jobseeker' status
- EEA nationals who are eligible for statutory homelessness assistance should have entitlement to benefits for six months
- Extend the move on period for newly recognised refugees to 56 days
- Funding for short term emergency accommodation for destitute migrants who are not entitled to statutory homelessness assistance, and are currently rough sleeping or at a high and imminent risk of rough sleeping, provided alongside access to advocacy and immigration and legal advice.

On the specific issue of people who are given 'no recourse to public funds' in relation to housing benefits and support, the HRSAG has previously made the following recommendation.

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.

2. Early intervention with high risk groups

Preventing homelessness for groups at high risk of homelessness has been an important feature of all of the work of HRSAG to date. The following recommendation captures this. It was originally framed – in the context of the HRSAG report on ending rough sleeping – to focus particularly on people 'at highest risk of rough sleeping'.

To address the question of how to end homelessness, it should now also be considered to include groups 'at highest risk of homelessness'. Our strengthened recommendation is:

Recommendation 6: 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 **and homelessness**

Scottish Government (SG) and all public bodies should respond to evidence of which groups constitute the highest proportion of people resorting to rough sleeping – **and the highest proportion of people who become homeless** - 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.

In addition, the HRSAG has additional recommendations in relation to **children and young people** which build on this broader recommendation.

The HRSAG is keen to stress the particular importance of addressing the needs of young people who may be at risk of homelessness in the short term and in the future. This requires a joined-up response from the Scottish Government incorporating other relevant programmes of work already in place, for example, but not exclusively:

- Child Poverty Delivery Plan
- Poverty and Inequality Commission
- Getting It Right For Every Child (GIRFEC)
- Independent Care Review

In each case, it is important that they address all issues that may impact on homelessness.

We recommend:-

Recommendation 7: Scottish Government and Local Government to ensure the consistent application of the Staying Put provision for care leavers and effective implementation of the Scottish Government Missing Persons' Framework as key interventions in preventing youth homelessness.

Recommendation 8: At a local level, there is helpfully a duty on local authorities and health boards to demonstrate action to tackle child poverty. Local authorities, health boards and their Community Planning Partners should recognise child poverty as a primary driver of homelessness and demonstrate action to tackle child poverty in Local Child Poverty Action Reports as required through the Child Poverty (Scotland) Act 2017, as well as in Local Outcome Improvement Plans and Children's Services Planning.

This would be expected to include:

- Education and health as key public services well placed to identify and offer help when there are early warning signs of homelessness
- Introducing homelessness and housing as a component of GIRFEC training
- Ensuring that all aspects of the housing system, from planning and building supply to nominations and allocations policies place GIRFEC at the heart of decision-making
- The provision of whole-family asset-based supportive interventions to help struggling families

Recommendation 9: Where children are homeless, a wellbeing assessment should be undertaken in relation to each child in the household to ensure any additional learning or social support is put in place through schools (subject to addressing how consent can be given for this in a way that doesn't stigmatise or impact negatively on the child). This assessment should also be considered when making allocations of temporary and permanent accommodation.

Recommendation 10: Rapid Rehousing Transition Plans, as recommended by HRSAG in their report on ending rough sleeping[6] and Local Housing Strategies should include the planning and development of pathways and a range of affordable housing options and associated supports for young people, including enabling sharing and community hosting options (e.g. supported lodgings).

Recommendation 11: In considering the protected characteristic of age, Equality Impact Assessments of Rapid Rehousing Transition Plans must ensure that the needs of young people are adequately addressed.

In addition to the preventative work we are advocating with struggling families, education and the clear link to child poverty, we need to tailor specific support for those young people who do become homeless. Often they will have a variety of needs that are a result of Adverse Childhood Experiences and associated trauma, and consequently will require a range of housing options with intensive support. The complexity of these needs must be addressed specifically and not conflated with the response for adults in older age ranges.

Skilled workers with experience in working with young people are necessary as their needs and behaviours require different approaches. The levels of poverty amongst young people are also much higher than many older individuals.

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[6] https://beta.gov.scot/publications/ending-rough-sleeping-in-scotland-interim-report/HARSAG%20-%20Q2%20recommendations%20-%20How%20to%20end%20Rough%20Sleeping%20-%20Report%20FINAL%20-%20PUBLISHED%207%20MARCH%202018.pdf?inline=true

The value of 'ordinary' home-like environments as an effective response to homelessness has been comprehensively demonstrated by the success of Housing First for adults, but the evidence base on Housing First for young people is promising though less definitive, with some concerns that young people are more likely to feel isolated in independent tenancies. Supported Lodgings can offer some of the benefits of 'normal housing' situations, while offering flexible and personalised support 'on site' to young people and combatting the isolation of moving into an independent tenancy 'too early'. There are also grounds for thinking that some in their teens might prefer the communal aspect and provision of specialist dedicated 24/7 support to nurture and strengthen them for the next step in their lives, and move-on to settled mainstream accommodation. Better evaluative evidence on the outcomes of all of these models of provision for young people is required. What is clear, however, is the very poor outcomes associated with large-scale, generic hostel provision.

3. Effective responses to those facing crisis

Improvements to collective efforts to prevent homelessness will be crucial, but there will always be those in crisis and an effective response to homelessness when it does occur will remain essential to provide immediate security to people at risk and to ensure that episodes are brief and non-recurrent.

Effective and comprehensive Housing Options interventions are key to addressing the needs of those facing a homelessness crisis. The current system provides many strengths which will be crucial to maintain and support. We welcome, for example, the existing duty to provide the right support for people who have been homeless. Scotland's homelessness legislation provides a safety net for all people who are homeless, not just those who are in "priority need" as exists in the rest of UK. In the planning for the roll out of this change in legislation (remove the "priority need" test) coming into force in 2010, the Scottish Government in close partnership with local authorities focused on the Housing Options approach which saw local authorities working with people facing homelessness to either prevent it, or to find a solution to their homelessness which meets their needs more broadly.

These strengths must also be built upon to now go further and ensure that even more is done on prevention, response and support. Many aspects of this have been addressed in earlier HRSAG reports, and our focus is on:

- Flexible approaches to delivering Housing Options services so they reach everyone who needs a response;
- Prevention of homelessness, and in particular pathways to ensure that those who are most at risk of homelessness are given the support tailored to their circumstances and needs;
- Legal duties on the widest range of public bodies and front-line services to work together to prevent homelessness when someone is at risk of becoming homeless;
- Abolishing local connection and limiting the impact of intentionality to deliberate manipulation to remove barriers that prevent people accessing support;
- A re-wiring of the system to one of 'Rapid Rehousing by default' as defined in earlier reports, through Local Authority Rapid Rehousing Transition Plans implemented over the next 5 years;
- Addressing wider support needs, and particularly employment and access to social security in a completely integrated way, as well as ensuring there is a clear role for services which enable people to rebuild social networks and purpose rather than simply focusing on the 'hard' outcomes of housing and employment;

- Ensuring that, where it is required, temporary accommodation is part of a clear pathway to mainstream settled accommodation, as set out in the HRSAG report on Transforming the Use of Temporary Accommodation.

In order to hard-wire changes which ensure joined-up housing support and other aspects of homelessness support, we recommend that:

Recommendation 12: Across their full range of delegated responsibilities Health & Social Care Partnerships should work in an collaborative way with Local Authorities, Housing Associations and the Voluntary Sector to prevent and tackle homelessness. Local Rapid Rehousing Transition Plans as part of the Local Housing Strategies to be fully integrated into Health & Social Care Partnership strategic plans. These should be included in the Housing Contribution statement to ensure they are part of the planning framework.

Recommendation 13: The Code of Guidance to specify expectations in relation to tenancy sustainment, including early intervention, to be addressed by landlords in all sectors, and how this is to be regulated. Social housing providers to ensure services in place to support early intervention and sustainment, health & wellbeing, good quality housing management and specialist support providers for people with more complex needs.

The recommendations here add to those set out previously.

4.1   Housing & housing services

Change of the scale being suggested through the HRSAG recommendations will have a significant impact on the current system. It will be important to ensure that in seeking transformational change to bring about an end to homelessness, these recommendations do not have unintended adverse consequences. Allocations policies for social housing should ensure that homelessness is not the main way to be allocated social housing, while recognising that appropriate levels of reasonable preference should reflect the urgency of need. This is <u>not</u> a recommendation to reintroduce the concept of Priority Need as abolished by legislation in 2012, but is a recognition that housing allocations can be the last line between a household being homeless and not being homeless and this needs to be prioritised.

The recent report from Heriot Watt University, 'Temporary Accommodation in Scotland: Interim Report'[7] identifies a differential contribution of Housing Associations to accommodating homeless households (not least, but not limited to, stock transfer authorities) which indicates a need to increase the overall level of lets to homeless households. We recommend that:

Recommendation 14: Housing stock transfer local authority areas should have a dedicated local structure that liaises independently between local authorities (with the statutory duty to accommodate) and Registered Social Landlords (as housing providers).

To support the ongoing improvement and development of the Housing Options model, and to build on previous recommendations to revise the Code of Guidance, it is further recommended that:

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[7] https://researchportal.hw.ac.uk/en/publications/temporary-accommodation-in-scotland-interim-report

Recommendation 15: there be a consultation on the inclusion of a new Code of Practice addendum, giving the Code of Practice a clear legal basis, alongside the current status of the Code of Guidance. This will enable staff to understand exactly what is required from them and therefore empower them to challenge if they are being asked in ways that cut across the legal position.

There are several recommendations relating to the Strategic Housing Investment Plans (SHIP) and the Housing Need and Demand Assessments (HNDA). It is important and helpful that concealed households and overcrowded houses are included in the chronic housing need measure of HNDAs, and that analysis of 'stock pressures' includes size/type/tenure of new build completions.

Building on this, we recommend that:

Recommendation 16: In the current review of HNDA guidance it would be helpful to also consider:-
- The analysis of time spent in temporary accommodation and lets to different types and sizes of households
- People with whom contact is lost or are otherwise not calculated in Temporary Accommodation estimates, but are part of the existing need
- Including more detail in the guidance to improve the analysis provided to capture the local evidence for homelessness, those in temporary accommodation and those with complex needs

Recommendation 17: Rapid Rehousing Transition Plans should be seen as an integral part of the SHIP, and should be annually reviewed as part of the SHIP process.

Recommendation 18: The Scottish Government and Scottish Housing Regulator should review current approaches to data collection from local authorities on housing association's completions and lettings relative to housing need.

In addition, a number of actions can be taken to reinforce the Rapid Rehousing agenda. We recommend:

Recommendation 19: Use the upcoming review of the Local Housing Strategy guidance and the Scottish Government Practice Guidance on Allocations and Suspensions, due to be published in the Autumn, to support and reinforce the Rapid Rehousing agenda.

Recommendation 20: Local Authorities should review their nomination/referral policies, set rehousing targets and closely monitor performance against those targets.

Recommendation 21: The Scottish Housing Regulator should increase its focus on the Access to Housing Standard of the Scottish Social Housing Standard to assess how all landlords are performing on these standards in relation to enabling access to homeless households.

Change of the scale being suggested through the HRSAG recommendations will have a significant impact on the current system. The importance of supporting the workforce cannot be underestimated as we collectively seek transformation. Protection, support and improved working conditions for frontline staff in particular will be crucial. People will always be at the heart of change

and improvement, and we need to ensure that the system is one which collectively invests in them. The empowerment of frontline staff in the actions taken following our recommendations over winter 2017-18 and the success it brought highlighted the impact frontline staff can have.

As such we recommend:

Recommendation 22: Scottish Government should work with partners to determine the actions needed to support frontline staff as they carry out their work, including in the design of systems, procedures and policies.

4.2 Housing sustainment

Preventing people from becoming homeless is clearly a priority, and there is a particular opportunity to achieve this with tenants of social landlords. As specific interventions we recommend:

Recommendation 23: Social Landlords, both housing associations and local authorities, to use all opportunities to support housing sustainment:
- Ensuring there is ongoing support for all tenants re-housed after homelessness, to ensure that appropriate preventative action is taken at the earliest signs of difficulties, such as anti-social behaviour or rent arrears, to deliver a focussed approach on prevention through tenancy sustainment
- Initiatives to address the issues of loneliness and social isolation
- All social landlords to have clear policies on domestic abuse, and ensuring that experience of abuse or violence does not lead to someone losing their tenancy – for example, arrangements should be put in place so that tenancies can transfer seamlessly to the person who has experienced abuse, and reciprocal arrangements should be put in place to ensure people who experience domestic abuse can move to a safer place and have continuity of tenancy
- Preventing evictions through more effective management of rent arrears, including early intervention such as financial heath-check for new and other vulnerable tenants
- Reviewing the Regulatory Framework around rent arrears in relation to social landlords, and reviewing pre-action protocols so that evicting into homelessness is avoided

This builds on the following recommendations made in the HRSAG report, 'Transforming the Use of Temporary Accommodation':

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

Employment & homelessness

A fundamental element of moving out of homelessness for many people is employability and employment. The HRSAG recommends improved integration of employment and housing support. This needs to be hard-wired into systems and structures to ensure it is available wherever needed.

In particular, the HRSAG makes the following recommendations:

Recommendation 24: At the Local Authority level, Local Housing Strategies to address how employability, equalities and digital and financial inclusion support will be provided for people who are at risk of homelessness as part of the Housing Options service. At the individual level, ensure these issues are addressed as part of Personal Housing Plans developed with Housing Options. These elements should be included in the recommended Code of Practice.

Recommendation 25: Housing Options teams (including Housing staff from RSLs and Local Authority staff) and Job Centre Plus teams to work in partnership to ensure that employability, employment and housing support is provided in a joined-up way. Specific interventions such as mentoring or coaching to be provided for young people at risk of homelessness.

The following recommendations, already set out in the Welfare Reform section, are also important here:
- There should be Housing/Homelessness specialists in Job Centre Plus with funding available for these posts to be made available to existing advice providers rather than directed by the Department for Work & Pensions (DWP). Work Capability Assessment to include homelessness as a 'supplementary descriptor'
- DWP to assess the likely impact of a benefit or social security sanction before issuing and sanctions should not be issued unless the DWP can satisfy itself that it will not cause homelessness

These HRSAG recommendations are consistent with proposals in other reports and initiatives.

The 'No One Left Behind - Next Steps for the Integration and Alignment of Employability Support in Scotland' sets out how the Scottish Government intends to create a fairer labour market, including developing an employability system that provides more effective and consistent support to those who are further removed from the labour market ensuring no one is left behind. There are 13 actions in this report including the following which relate specifically to housing, but all are relevant to the HRSAG's work on ending homelessness:

Housing	
Support the development of a Housing Options Toolkit on employability for local authority and registered social landlord frontline staff management and delivery of housing options to signpost more people to employability services.	March 2019
Work with homeless organisations to increase the focus of employability within homeless organisations and identify referral routes to direct people to local and national employability support.	August 2019

The Scottish Government needs to ensure the implementation plan for HRSAG recommendations, and the action plan for 'No One Left Behind' are clearly joined-up.

The Joseph Rowntree Foundation report, 'UK Poverty: Causes, Costs & Solutions' sets out some approaches and recommendations in relation to youth homelessness and employment-focused services, which should be reviewed and potentially adopted:

"*Aligning and integrating youth homelessness and employment-focused services is seen as increasingly important by practitioners in the field. Youth homelessness providers endorse tailoring these to young people's strengths and interests to engage them in learning, training and employment opportunities (an 'asset-based' approach). This requires the development of closer partnerships with local employers and the provision of both pre-and in-work support. The available evidence indicates that job coaching – an approach that has features in common with the Individual Placement and Support (IPS) – is positively associated with gaining and sustaining employment, particularly among young people. JRF recommends that service providers working with vulnerable young people build partnerships with local employers to promote access to supported opportunities in workplaces.*

The Individual Placement and Support (IPS) model of supported employment for people with severe mental health conditions bears a striking resemblance to the ethos of Housing First. JRF recommends that the UK Government and devolved administrations invest in national IPS programmes for people with severe and enduring mental health conditions to help them to gain and sustain employment. Also, that the devolved administrations and local authorities develop programmes similar to IPS for other complex needs groups, including those with chronic homelessness, substance misuse, or offending backgrounds." [8]

5.   Wider societal and government approach to homelessness

Many of the recommendations made by the HRSAG require a concerted cross-government approach to tackling and ending homelessness. It will also require a commitment that transcends the political and parliamentary cycle, so also needs a cross-party commitment. This final set of recommendations builds on those recommendations.

5.1   Stigma & attitudes to homelessness

Recommendation 26: Scottish Government should launch, commission or be a partner in a public awareness campaign designed to tackle negative attitudes / stigma about homelessness and homeless people.

This could helpfully build on the work of organisations such as Street Soccer working to highlight poverty and social isolation as causes of homelessness and promoting the building of social connections as an important mechanism to tackle homelessness. This should also draw on the Frameworks Institute work for Crisis UK which recommends interventions to build positive public discourse most likely to achieve positive change. The Frameworks Institute research involved more

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[8] https://www.jrf.org.uk/report/uk-poverty-causes-costs-and-solutions

than 10,000 members of the public across the UK, and has the following over-arching recommendations:

> - *"Remind people of our shared moral status as human beings and members of society. Highlighting what we share prevents people from distancing themselves from--or "othering"-- people who are experiencing or have experienced homelessness.*
> - *Describe the lived experience of homelessness. Communicating what homelessness and housing insecurity is like--and feels like--gives people a visceral understanding of homelessness that generates concern, not pity.*
> - *Tell a "systems story." Instead of framing homelessness as a problem that affects individuals, emphasize its systemic causes and consequences. Doing so helps the public understand and support systemic solutions to homelessness, such as policies to pay workers living wages and incentivize the creation of affordable housing units."[9]*

5.2   Cross-government action

In addition to previous recommendations on 'Ending Rough Sleeping' and 'Transforming the Use of Temporary Accommodation', as well as in this report, the HRSAG recommends two key ways to ensure there is a fully joined-up approach:

Recommendation 27: The Fairer Scotland Duty places a legal responsibility on particular public bodies in Scotland to actively consider ('pay due regard to') how they can reduce inequalities of outcome caused by socioeconomic disadvantage when making strategic decisions. Guidance already makes specific reference to homelessness, and prevention of homelessness should be considered as a key part of the implementation phase.

Recommendation 28: Homelessness must be seen as a public health priority, with all areas of Government prioritising it as such. In particular this must be considered by the wider public sector, the third sector and community partners to support work to improve the health of the population, in line with the Public Health Priorities.

The link to health is highlighted as the impact of homelessness on health is considerable. In any other area of work, an average age of death of 43 would be considered a national scandal[10]. As would any group that is 17 times more likely to be violently attacked, or 9 times more likely to commit suicide. This is the case with people experiencing rough sleeping and needs therefore to be considered a Public Health priority[11].

The Scottish Government's recently published Public Health Priorities[12] set out the importance of place, home and community in ensuring that everyone in Scotland is as healthy as they can be. It also states that *"everyone should have access to an affordable, safe and warm home"*. The Scottish Government, in partnership with COSLA, local authorities and health bodies should work together to ensure that this vision becomes a reality. The link to poverty is clear. Childhood poverty is the

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[9] http://frameworksinstitute.org/assets/files/crisis_messagememo_2018_reframing_homelessness.pdf
[10] https://www.theguardian.com/society/2018/apr/11/deaths-of-uk-homeless-people-more-than-double-in-five-years , https://www.crisis.org.uk/media/236799/crisis_homelessness_kills_es2012.pdf , https://www.crisis.org.uk/about-us/latest-news/new-research-reveals-the-scale-of-violence-against-rough-sleepers/
[11] https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(17)31959-1/fulltext
[12] http://www.gov.scot/Publications/2018/06/1393

biggest predictor of homelessness. The realities of destitution are the daily realities of many homeless people[13]. This needs to be addressed systemically and for good.

Finally, although the HRSAG has not made an assessment of the costs and economic benefits of tackling homelessness in the way we have recommended, we are clear there is a need for investment – in the housing supply, systems and culture transition, and service provision required to prevent and tackle homelessness. This is especially true in the context of oncoming changes to housing related benefits which may reduce the funding currently available. The Scottish Government will need to ensure there is the funding to back any changes that are made to end homelessness.

Recommendation 29: We recommend a full analysis of the costs and economic benefits is included in the Scottish Government's implementation plan for the recommendations made by HRSAG.

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[13] https://www.jrf.org.uk/report/destitution-uk-2018

Table of recommendations

Recommendation 1: The Rapid Re-housing Transition Plans which are recommended by the HRSAG in relation to both ending rough sleeping and transforming the use of temporary accommodation must include an Equalities Impact Assessment which will cover all protected characteristics, and additionally assess impact according to 'socio-economic status'.

Recommendation 2: The Personal Housing Plans which are at the heart of the response to individuals at risk of homelessness will need to be sensitive to all forms of inequality, but especially need to consider 'financial hardship' as an additional aspect, so we are not inadvertently trying to resolve a housing and/or support need and at the same time pushing someone further into poverty or destitution.

Recommendation 3: to ensure the social security offer supports households to avoid homelessness and to exit homelessness as quickly as possible when it does occur. As key elements of this, we recommend Scottish Government examine the case and pursue changes for the following:
- The way Local Housing Allowance is calculated needs to be reformed, raised to the 30th percentile everywhere, as well as being uprated on a regular basis
- The overall Benefit Cap needs to be raised and the benefit freeze ended so that households are not forced into destitution – this is especially true for single people in younger age groups who are particularly vulnerable to homelessness and destitution as a group
- With the introduction of Universal Credit, deduction rates for advances, arrears, overpayments and all other third party deductions should be reduced; exemptions for the Shared Accommodation Rate need to be extended; and the 5-week waiting time needs to be removed as this creates arrears right from the start
- There should be independent Housing/Homelessness specialists in Job Centre Plus with funding available to be made available to existing advice providers rather than directed by the Department for Work & Pensions (DWP)
- Work Capability Assessment to include homelessness as a 'supplementary descriptor'.
- DWP to assess the likely impact of a benefit or social security sanction before issuing and sanctions should <u>not</u> be issued unless the DWP can satisfy itself that it will not cause homelessness

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Recommendation 4: *Strengthened previous recommendation* Scottish Government, local authorities and Registered Social Landlords should continue to ensure an adequate affordable and social housing supply to tackle immediate needs, **including a commitment to continue investing at comparable levels in affordable social housing beyond the current programme to safeguard supply in the longer term.** 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 5: We recommend that other priorities on preventing migrant homelessness will need to include:
- Ensure that an assertive outreach model is available to provide personalised support, including the need for access to immigration and legal advice services and the need for employment support – recognising the need to operate within current rules on providing immigration and legal advice
- Reinstate entitlement to Housing Benefit or the housing element of Universal Credit for EEA nationals with 'jobseeker' status
- EEA nationals who are eligible for statutory homelessness assistance should have entitlement to benefits for six months

- Extend the move on period for newly recognised refugees to 56 days
- Funding for short term emergency accommodation for destitute migrants who are not entitled to statutory homelessness assistance, and are currently rough sleeping or at a high and imminent risk of rough sleeping, provided alongside access to advocacy and immigration and legal advice.

Recommendation 6: *Strengthened previous recommendation* 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 **and homelessness**

Scottish Government (SG) and all public bodies should respond to evidence of which groups constitute the highest proportion of people resorting to rough sleeping – **and the highest proportion of people who become homeless** - 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.

Recommendation 7: Scottish Government and Local Government to ensure the consistent application of the Staying Put provision for care leavers and effective implementation of the Scottish Government Missing Persons' Framework as key interventions in preventing youth homelessness.

Recommendation 8: At a local level, there is helpfully a duty on local authorities and health boards to demonstrate action to tackle child poverty. Local authorities, health boards and their Community Planning Partners should recognise child poverty as a primary driver of homelessness and demonstrate action to tackle child poverty in Local Child Poverty Action Reports as required through the Child Poverty (Scotland) Act 2017, as well as in Local Outcome Improvement Plans and Children's Services Planning.
This would be expected to include:
- Education and health as key public services are well placed to identify and offer help when there are early warning signs of homelessness
- Introducing homelessness and housing as a component of GIRFEC training
- Ensuring that all aspects of the housing system, from planning and building supply to nominations and allocations policies place GIRFEC at the heart of decision-making
- The provision of whole-family asset-based supportive interventions to help struggling families

Recommendation 9: Where children are homeless, a wellbeing assessment should be undertaken in relation to each child in the household to ensure any additional learning or social support is put in place through schools (subject to addressing how consent can be given for this in a way that doesn't

stigmatise or impact negatively on the child). This assessment should also be considered when making allocations of temporary and permanent accommodation.

Recommendation 10: Rapid Rehousing Transition Plans, as recommended by HRSAG in their report on ending rough sleeping[14] and Local Housing Strategies should include the planning and development of pathways and a range of affordable housing options and associated supports for young people, including enabling sharing and community hosting options (e.g. supported lodgings).

Recommendation 11: In considering the protected characteristic of age, Equality Impact Assessments of Rapid Rehousing Transition Plans must ensure that the needs of young people are adequately addressed.

Recommendation 12: Across their full range of delegated responsibilities Health & Social Care Partnerships should work in an collaborative way with Local Authorities, Housing Associations and the Voluntary Sector to prevent and tackle homelessness. Local Rapid Rehousing Transition Plans as part of the Local Housing Strategies to be fully integrated into Health & Social Care Partnership strategic plans. These should be included in the Housing Contribution statement to ensure they are part of the planning framework.

Recommendation 13: The Code of Guidance to specify expectations in relation to tenancy sustainment, including early intervention, to be addressed by landlords in all sectors, and how this is to be regulated. Social housing providers to ensure services in place to support early intervention and sustainment, health & wellbeing, good quality housing management and specialist support providers for people with more complex needs.

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[14] https://beta.gov.scot/publications/ending-rough-sleeping-in-scotland-interim-report/HARSAG%20-%20Q2%20recommendations%20-%20How%20to%20end%20Rough%20Sleeping%20-%20Report%20FINAL%20-%20PUBLISHED%207%20MARCH%202018.pdf?inline=true

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