# Temporary Accommodation Task and Finish Group

**Final Report and Recommendations** 



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# **Foreword**

Scotland is in the grip of a homelessness crisis that is damaging the lives and opportunities of thousands of families with children and young people across every community in Scotland.

For decades the reality of our broken housing system has been obvious to those on the frontline. Too many people denied the means to keep the home they have and too few social homes to provide a secure, affordable, and stable future.

It is six years since the Scottish Government and COSLA convened the Homelessness and Rough Sleeping Action Group. Their **Ending Homelessness Together** plan set the goal of making homelessness rare, brief, and non-recurring. It proposed transitioning to a **Rapid Rehousing** approach to reduce the need for temporary accommodation and the widespread adoption of **Housing First** for households with multiple and complex needs. These were seen as gamechangers and drew widespread support from across the frontline and Parliament.

The ambitions of that plan have not matched up to the realities on the ground.

Now in 2023 we have rising rough sleeping, record numbers of people trapped in the homelessness system for longer and the national scandal of nearly 10,000 children in temporary accommodation.

The combined impact of ongoing austerity, the global pandemic, the war in Ukraine and the associated cost of living crisis necessitated a new approach that could meet the needs of people on the ground.

Last year the Scottish Government- and COSLA-chaired Homelessness Prevention Strategy Group proposed the creation of a short-term Task and Finish Group with the remit to reduce both the number of people in temporary accommodation and the length of time people spend there.

We were both gratified to be invited to co-chair the group and undertook to engage as widely as possible. We heard directly from families and individuals trying to access

homelessness services and housing in their community. We took representations from equalities groups, advice bodies and third sector organisations working every day on the frontline. Local Government leaders from rural and urban Scotland shared best practice and common challenges that they experience as the guardians of legal duties to homeless households.

What we found was that no matter where people find themselves in the system, the solutions are strikingly similar and straightforward. We need more homes; we need to use the homes we have more effectively and we need to fund services properly to treat people with dignity and respect.

If the solutions are simple, we recognise that they are not cheap. This report sets out the evidence and recommends what must be done. What the members of the Task and Finish group cannot do is choose to put the resources where they are needed to make it happen. That is a choice for our elected representatives and one that thousands of households currently waiting for a permanent home await with interest.

Co-Chairs of the Temporary Accommodation Task and Finish Group: Alison Watson, Director, Shelter Scotland and John Mills, Co-Chair of ALACHO and Head of Housing, Fife Council.

# Introduction

There are increasing numbers of people living in temporary accommodation (TA) in Scotland, and people are now living there for increasingly long periods of time.

# Numbers in temporary accommodation

On the 30<sup>th</sup> September 2022 there were 14,458 households living in TA in Scotland. This is an increase of over 34% since March 2012 and is the highest on record<sup>1</sup>. There are also increasing numbers of children living in TA. The latest statistics show that on 30<sup>th</sup> September 2022 there were 9,130 children in Scotland living in TA, which again is the highest number on record.

There are significant variations across Scotland in terms of the numbers and trends in TA. Edinburgh has high and increasing numbers of households living in TA. On the 30<sup>th</sup> September 2022 Edinburgh had 3,371 households living in TA, 9% higher than the same date the year before and the highest on record for the city. In Glasgow the number of households in TA has increased by 1% from 2,929 households in September 2021, to 2,972 households on 30th September 2022. Aberdeen has seen a 22% increase in the numbers of households in TA, from 237 households in September 2021, to 288 households in September 2022.

Conversely, Dundee reported reductions in the numbers of people in TA compared to the previous year<sup>2</sup>. This suggests that although Scotland-wide figures indicate the scale of the problem at a national level, it is not the same trend in all areas. The Temporary Accommodation Task and Finish Group (the Task and Finish Group) heard from a range of local authorities who are experiencing different pressures and levels of need in their area.

# Length of time in temporary accommodation

Households are now spending increasingly long periods in TA. In 2021-22, the average amount of time spent in TA was 207 days.<sup>3,4</sup> This is more than a month longer than in 2017-18, when the average was 175 days.<sup>5</sup> Furthermore, 18% of all households whose case was

<sup>&</sup>lt;sup>1</sup> Scottish Government (2023), Homelessness in Scotland: update to 30 September 2022

<sup>&</sup>lt;sup>2</sup> 324 households in Dundee were in TA on 30<sup>th</sup> September 2022, 23% less than on the same date the year before (423 households).

<sup>&</sup>lt;sup>3</sup> These figures refer to households who took up temporary accommodation and whose case closed in 2021-22.

<sup>&</sup>lt;sup>4</sup> Scottish Government (2022) Homelessness in Scotland: 2021/22

<sup>&</sup>lt;sup>5</sup> Data on length of time in TA has only been collected since 2017-18, so a longer time series is not available.

closed in 2021-22 had spent more than one year in TA. Additional Scottish Government analyses made available for the Task and Finish group showed that for cases which were still open, the situation was even worse, with 26% of all households in TA on 31<sup>st</sup> March 2022 having already spent over one year there. This equates to 4,597 households stuck in TA for more than a year and highlights the importance of data being made available on time spent in TA for households who are currently homeless, to understand the sheer scale and extent of the issue.

Time in TA varies significantly by household type. Households with children tend to stay in TA for longer periods of time: in 2021-22 a couple with children spent on average 343 days in TA, compared to a single person where the average was 193 days. Again, the time households stay in TA also varies greatly by local authority. In Edinburgh a single person spent an average of 392 days in TA and a couple with children spent an average of 725 days. In contrast, Perth and Kinross' average time in TA was 54 days for a single person and 77 days for a couple with children.

That children spend on average almost a year in TA is of significant concern as we know this can have a detrimental long-term impact on children's wellbeing<sup>6,7</sup> and on levels of child poverty in Scotland. The Task and Finish group heard evidence on larger households struggling to move on from TA and this is supported by data showing the larger the household size, the more likely the household was to have been in TA for more than one year.<sup>8</sup>

# **Equalities considerations**

Public authorities must have 'due regard' to the public sector equality duty set down by the Equality Act 2010 and take into account the advancement of equality between people with a protected characteristic and those without the protected characteristic. This duty applies to local authorities in the context of acting as housing and homelessness support providers. The duty also applies to bodies who are not public authorities but who 'exercise public functions'.

<sup>&</sup>lt;sup>6</sup> NHS Lanarkshire, Rebecca Campbell (2019) <u>A Health Needs Assessment of children experiencing</u> homelessness

<sup>&</sup>lt;sup>7</sup> Shelter (2017) Research: Impact of homelessness on children - research with teachers

<sup>&</sup>lt;sup>8</sup> Additional analyses provided by the Scottish Government to the Temporary Accommodation Task and Finish Group

The Task and Finish group recognises that there are equalities considerations that must be carefully taken into account when making recommendations to reduce the numbers of people in TA, and how long they stay there. The Task and Finish group heard evidence on how characteristics such as disability and gender can intersect with homelessness. This often leads to additional barriers and longer stays in TA, due to the lack of suitable permanent accommodation to meet the needs of someone with a disability, or there being no appropriate single sex TA available for women and their children 9,10.

There is also evidence that households who are homeless with main applicants from minority ethnic groups are more likely to use temporary accommodation than households with 'White Scottish' and 'White Other British' main applicants, <sup>11</sup> and are more likely to experience longer stays in TA<sup>12,13</sup>.

There is however a lack of data on the homelessness experiences of groups with protected characteristics such as gender reassignment, religion, and sexual orientation, and limited data on disability and ethnicity. Consideration must be given to how this data is collected to enable us to better understand their experience of homelessness and the services they require. This will be used to inform the practice and policies put in place to ensure they have equity of access to these homelessness services.

# **Operational and policy context**

The Scottish Government convened the Homelessness and Rough Sleeping Action Group (HARSAG) in September 2017. The Local Government and Communities Committee also carried out a year-long inquiry into homelessness which began in February 2017. The recommendations from these two workstreams were condensed into the Scottish Government and COSLA's (Convention of Scottish Local Authorities) Ending Homelessness Together Action Plan in November 2018<sup>14</sup>.

<sup>&</sup>lt;sup>9</sup> A survey of Women's Aid groups carried out by Scottish Women's Aid in October 2022 found that 70% of respondents reported that there was no suitable single sex local authority TA for women (with or without) children in their area.

<sup>&</sup>lt;sup>10</sup> A paper submitted to the Task and Finish Group by Scottish Women's Aid

<sup>&</sup>lt;sup>11</sup>There is a lower proportion of households with 'White Scottish' and 'White Other British' main applicants in TA compared to the overall proportions making an application. There are higher proportions of all other ethnic groups in TA compared to overall applications.

<sup>&</sup>lt;sup>12</sup> For example, in 2021/2022 households where the main applicant was of African ethnicity spent on average 333 days in TA. This is compared to an average of 205 days for households where the main applicant was White Scottish.

<sup>&</sup>lt;sup>13</sup> Scottish Government (2022) Homelessness in Scotland: 2021/22

<sup>&</sup>lt;sup>14</sup> Scottish Government (2018) Ending homelessness and rough sleeping: action plan

The Ending Homelessness Together Action Plan set out a vision that everyone has a home that meets their needs, and homelessness is ended. The action plan committed to shifting towards rapid rehousing by default, to ensure people who do become homeless will be rapidly re-housed. This was adopted with the aim of preventing the damaging experiences of staying in unsuitable TA, such as B&Bs. This strategy is led by the Homelessness Prevention and Strategy Group, which is co-chaired by the Scottish Government and COSLA. A key focus of the strategy is to ensure that homelessness is only ever 'rare, brief and non-recurrent'.

Clearly, these policies don't operate in a vacuum and must respond to the changing environment we're living in. Scotland's housing and homelessness system is operating under increasing social and economic pressure and is at breaking point. Factors such as the Covid pandemic, Brexit, and the cost-of-living crisis are all impacting on the already overstretched homelessness system. In addition, the correct decision to provide homes for those fleeing war and persecution has resulted in increasing demand for permanent homes which are not available, and homelessness services which are struggling to cope. This is happening at a time when many of those same pressures are contributing to the budgets to deliver these requirements becoming increasingly constrained. As such, it is important to acknowledge the difficult context in which local authorities are operating under as this report is being published.

# The Temporary Accommodation Task and Finish Group

This report outlines the solutions put forward by the Task and Finish Group. The group was one of four set up by the Scottish Government to report to the co-chairs of the Homeless Prevention and Strategy Group (HPSG): Shona Robison MSP, the Cabinet Secretary for Social Justice, Housing and Local Government and Cllr Maureen Chalmers, Community Wellbeing Spokesperson at COSLA.<sup>15</sup>

The Temporary Accommodation Task and Finish Group had a specific remit to consider how Scotland can 'turn the dial' on the statistics with the aim of reducing the number of people living in temporary accommodation and the length of time they stay there.<sup>16</sup>

<sup>&</sup>lt;sup>15</sup> There is also an additional Temporary Accommodation Standards Working Group.

 $<sup>^{16}</sup>$  Please see full remit of the Temporary Accommodation Task and Finish Group and membership in Appendix 1

This Task and Finish Group is co-chaired by Alison Watson (Director, Shelter Scotland) and John Mills (Co-chair of ALACHO and Head of Housing at Fife Council) and met eight times between June 2022 and February 2023. The group has considered presentations from group members and external speakers and, importantly, contributions from people with lived experience who have fed their views and experiences into the group's discussions.<sup>17</sup>

The constraints and time-limited nature of the Task and Finish group process meant we were unable to get behind the detail of every issue and recommendation. A good example of this is on locality: we know that there are different challenges, and opportunities, in different parts of the country. However, we have not been able to consider directives on what specific local authorities should do. Instead, we trust that local experts with access to all the data and facts are best placed to make decisions about local implementation of the recommendations outlined; that national guidance will take account of these nuances and that analysis and scrutiny of decisions — as referenced in several recommendations — can do likewise. The group's discussions also naturally stretched beyond the remit and as such, we have captured these elements in a separate section so that this insight and evidence is not lost.

What follows are fifteen recommendations which have been developed by the group, centred on three key priorities. The recommendations set out what the Task and Finish group consider must be taken on by COSLA, the Scottish Government, and local authorities themselves to reduce the numbers of people living in TA, and how long they stay there. This work should be taken forward as a priority in order to ensure that the housing and homelessness systems are able to withstand the increasing pressures that they are experiencing, and to ensure the right to a home is upheld for everyone in Scotland.

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<sup>&</sup>lt;sup>17</sup> A full list of presentations and evidence heard by the group are listed in Appendix 2.

# Priority 1: New supply of social homes means people experiencing homelessness will be able to move rapidly into a permanent home

A rapid and significant increase in social homes is required to reduce the numbers of households in temporary accommodation and the length of time they spend there. Increasing the supply of social homes will mean that people can move more quickly into settled accommodation. By aligning the location, type and size of these homes to local housing need, with particular consideration for households experiencing homelessness, we can work rapidly towards addressing equality issues ensuring that the needs of specific groups are given attention as required. This includes people from ethnic minorities, people with disabilities, larger households and families with children, who routinely spend long periods stuck in TA because of a lack of appropriate permanent homes in existing social housing stock.

#### Recommendations

**Recommendation 1:** The Scottish Government must at a minimum adequately fund the delivery of new social homes through the Affordable Housing Supply Programme (AHSP) to meet a target of delivering 38,500 social homes by 2026.<sup>18</sup>

The AHSP is not currently on track for delivering the target homes required and the latest budget announcements showed a cut to the capital housing budget. If this target is missed, affordable housing need will increase, illustrated at least in part by the number of households in TA.

**Recommendation 2:** The **Scottish Government** should urgently introduce a large-scale national acquisition policy and action plan to buy private sector properties.

This Acquisition Plan would provide a single point of contact for private owners and landlords. It would be adopted locally as required and delivered by **local authorities** through

<sup>&</sup>lt;sup>18</sup> The Scottish Government is committed to deliver 110,000 affordable homes, at least 70% for social rent, by 2032. A 5-year interim target of 38,500 social homes delivered by 2026 (during this parliamentary term) would represent 50% of the Scottish Government's longer-term 10-year target. Scottish Government (2021), Scottish Government and Scottish Green Party Draft Shared Policy Programme: Working together to build a greener, fairer, independent Scotland

their Strategic Housing Investment Plans and would support them to rapidly scale up their acquisition programme and quickly drive up the numbers of social homes available for let. Acquisitions should be prioritised and aligned to local housing needs, using homelessness data to target purchases of properties that will meet the needs of those currently stuck in TA for long periods. This should support equality issues to be addressed ensuring that the needs of specific groups are given attention as required.

This programme should prioritise properties that are currently empty, to ensure the programme meets the objectives of the Task and Finish Group in moving people on from temporary to permanent accommodation. There are also opportunities to extend the programme as part of a pre-action protocol for private landlords looking to sell, for example making it a requirement for a landlord starting eviction proceedings in order to sell the property to have considered selling their property to the local authority first. This could be used as a mechanism to prevent homelessness and therefore reduce the number of households in need of TA.

There was a minority view expressed that a new policy and action plan might be unnecessary and a suggestion that the same policy intention could be achieved by a ministerial circular or an amendment to the Scottish Government's Local Housing Strategy guidance.

Regulator (SHR) on whether their Rapid Rehousing Transition Plans (RRTPs) and Housing Need and Demand Assessments are directly informing and influencing their Strategic Housing Investment Plans (SHIPs); and how the delivery of the required social homes through the AHSP programme is reducing affordable housing need for all households, including those with protected characteristics. In particular, reporting should focus on how the delivery of the AHSP is assisting households experiencing homelessness to move to permanent tenancies.

The important element is that all local strategies relating to housing and homelessness are aligned to provide a comprehensive approach to reducing affordable housing need, in this

case illustrated by numbers of households in TA.<sup>19</sup> Generally, there should be a focus on better use of data to more effectively tackle need.

Given the often-unmet requirement for larger family homes and adapted properties highlighted by and to the group, recommendation 3 gives further opportunity to stimulate targeting of stock acquisition and new supply to groups in greatest need, and crucially to give the ability to assess progress in meeting the needs of these groups.

When coupled with recommendation 6, this recommendation should also encourage and ensure appropriate usage of all the tools available to local authorities especially where local authorities are currently failing to meet their statutory duties.

Recommendation 4: The Scottish Government should publish data annually on how long households who are currently living in TA have been there. This data should be made available at a national and local authority level and be broken down to households with and without children and should include the distribution of time spent in TA as well as average days. It should also include a breakdown of time in TA for those who have been in TA for over a year.

Currently, the Scottish Government statistics only publish time in TA for cases that are closed. Publishing data on those households currently living in TA will better reflect the population of people in TA in each local area and give a fuller understanding of the scale and extent of the issue. This will help to inform responses to TA and permanent housing supply in local authority areas. This information about all households in TA is already gathered, so this would not require any new information from local authorities.

Recommendation 5: The **Scottish Government** and **local authorities** should work together to review how they could standardise and improve collection and recording of data on people experiencing homelessness with disabilities and/or support needs.

This will help to inform decisions on how to meet the accommodation and support needs of people experiencing homelessness to support them in moving on from TA and/or homelessness.

<sup>&</sup>lt;sup>19</sup> A further opportunity that the group wasn't able to explore is current work to refresh the Strategic Planning Guidance – the current draft version includes reference to the review of Housing Contribution Statements but does not include consideration of RRTPs, which could be added.

As part of this review, the Scottish Government and local authorities should consider:

- Issuing detailed guidance to local authority staff on how to assess and record support needs, specifically disability and health requirements within the home for people experiencing homelessness.
- Reviewing the current questions on support needs in the HL1 data returns, considering if they capture these needs accurately. If not, these questions should be consolidated, sharpened and/or extended.
- What would be proportionate for local authorities to collect and report back on to the Scottish Government and the SHR
- Incorporating existing good practice: some local authorities have completed
  homelessness support needs assessments and research into local disability needs. Other
  local authorities should be encouraged to follow suit as part of their Housing Need and
  Demand Assessments and Local Housing Strategy priorities.

# The evidence we heard

# Statistics and lived experience

(Recommendations 1, 2, 3)

Households with children spend longer in TA than households without, and evidence heard by the group indicated a particular issue for households with specific needs relating to disability or household size which may mean the pool of potential accommodation for them is not available in current household stock or allocation lists.

### Challenges to be overcome

(Recommendations 1, 2, 3)

The SHR outlined the perfect storm for LAs and Registered Social Landlords (RSLs) with Brexit, the pandemic, the cost-of-living crisis, the Ukrainian Refugee super sponsor scheme, enhanced regulatory requirements for social landlords, and the rent freeze. We therefore must look to other innovative ways to drive up supply such as the acquisition programme.

The group heard that often local authorities' RRTPs do not fully inform their SHIPs, meaning that the two may not be aligned and so affordable housing need is not being adequately targeted or tracked.

The 2023/24 Scottish Budget outlined a 16% year-on-year cut to the housing capital.

# Priority 2: Maximal use of existing housing stock increases the options for people to move to a permanent home

There is a broad suite of tools available to local authorities to balance existing temporary and permanent stock, and ensure households are supported to move on from TA as quickly as possible. This set of recommendations aim to give structure and support to local authorities in terms of using the relevant tools to actively manage housing stock in their area. It also outlines expectations on how they should be used to address affordable housing need, in this instance illustrated by the 'backlog' in TA.

#### Recommendations

**Recommendation 6:** All **local authorities** should provide a Locality Profile outlining needs and demands aligned to their RRTP and undertake refreshed modelling on TA in their area. Local authorities should build this into a refreshed Rapid Rehousing Transition Plan/Prevention of Homelessness approach using national guidance developed by the **Scottish Government** outlining expectations on the use of tools. Structured reporting to the SHR should be undertaken by local authorities<sup>20</sup> on how their approach is addressing affordable housing need, including the backlog in TA.

It is also vital that each local authority provides a formal Locality Profile which will help local authorities to clearly self-assess the housing need and homelessness situation in their area. Local authority reports to the SHR should make reference to how they have considered the various tools available including but not limited to those set out below. Not all tools will be appropriate in all localities. The group agreed that to clear the backlog in TA, increased and focused use of these tools might be required in the short to medium term and this should be reflected in guidance in recommendation 7.

**Allocations: Local authorities** should look to increase the percentage of lets to homeless households for a fixed period to address the backlog of households in TA waiting for a permanent home. This should include an increased and significant contribution from RSLs where appropriate, which should be tracked and assessed via section 5 referral data.

<sup>&</sup>lt;sup>20</sup> This structured reporting should be through each Local Authorities Annual Risk Assurance statement to the Scottish Housing Regulator by 31<sup>st</sup> October.

**Flipping: Local authorities** should consider a large-scale program of flipping TA to permanent accommodation. This is particularly relevant in areas where there are high numbers of households who have been stuck in TA for a long period of time. [see recommendation 7]

**Empty homes: Local authorities** should look to reduce the numbers of long-term empty properties in their local area and bring these back into use as social homes to permanently house people living in TA. One route for this is through the use of Compulsory Purchase Orders.

**The PRS:** In some circumstances, the PRS can offer some capacity to meet housing need. It can be an appropriate housing option for some people where rents are not prohibitive and tenants have access to independent advice and advocacy. **Local authorities** should, where appropriate, consider how they can support people in accessing affordable, secure PRS homes of a good standard.

There was a minority view in the group that the PRS could play an even larger role where conditions allow.

Recommendation 7: The Scottish Government and COSLA should develop national guidance on the tools available for local authorities to actively manage housing stock in their area to ensure maximal use of stock. Guidance on the process of 'flipping' of TA into permanent accommodation in particular should outline the benefits and costs, as well as how to overcome challenges and barriers. Guidance should also cover the components required to ensure flipping is carried out in a rights-based way, with access to independent advice and support for households, ensuring that people are supported and given control to make an informed choice.

Guidance should set expectations with regard to focused use of some of these tools which should be encouraged in the short to medium term by local authorities where there is a backlog in TA.

**Recommendation 8:** There should be a statutory requirement for each **local authority** area to have a single common housing register and a single common allocation policy to remove barriers for people in applying for social housing and navigating the system. These processes should be reviewed to ensure equal access particularly for those households who struggle to access these systems, for instance because of digital exclusion, language or literacy barriers.

Until this time, and in line with priority area 3, there is a clear need for more support to be made available for people to navigate the existing complex systems which are disadvantaging households with additional support needs.

There was a minority view that common housing registers and allocation policies should not be mandated because they would have significant resource implications and a long lead-in time.

## The evidence we heard

#### **Allocations**

(Recommendation 6)

The RRTP analysis and review undertaken by Anna Evans for HARSAG outlined the need at that time (2018) for an increase in allocations of social lets to homeless households to a national average of around 50% — with local needs dictating higher and lower levels of allocations. This was said to be necessary to meet new homelessness demand as well as the backlog of people living in TA within five years. Whilst those figures are now out of date, the principle of the need for a higher allocation rate remains.

Shelter Scotland analysis of official statistics shows that in 2021-22 social landlords let 39% of homes to homeless households. The number of social lets to homeless households varies between local authorities from 15% to over 70% of allocations. A greater proportion of local authority lets were made to homeless households than registered social landlord lets (46% versus 33% of lets).

Some local authorities, including Glasgow, have referenced the challenges they face as a stock transfer authority in securing sufficient allocations to homeless households. Registered social landlords in Glasgow are providing 42% of all lets to homeless households, despite Glasgow City Council asking for 60%.

During the pandemic North Ayrshire Council focused on moving on clients who had been in TA for over 18 months. As a result, they have sped up the journey through TA and successfully reduced the number of people who were homeless for long periods of time. Whilst time in TA was reduced, overall numbers of households in TA increased as the impact of the pandemic and cost of living crisis continued.

Perth and Kinross presented their approach to rapid rehousing which included utilising their own modelling tool to reduce their stock of TA (and therefore usage of TA) by reducing demand by increasing their homelessness prevention activity, maximising the usable capacity of their TA stock by minimising length of stay and employing effective void management, flipping tenancies to permanent homes and making changes to their allocation procedures. Tackling the 'queue' in TA was outlined as key to moving towards a rapid rehousing approach.

# **Flipping**

(Recommendation 6, 7)

**Perth and Kinross** have flipped tenancies from TA into permanent accommodation to address the backlog in the homelessness system. As part of this process, they permitted residents to keep their furniture and white goods, allowing a smooth transition of tenancy. This additional benefit was also highlighted by a survey respondent who underlined the value of being able to keep everything currently in the accommodation when tenancies were flipped.

**North Ayrshire** take a targeted customer centred approach to flipping tenancies: they flip tenancies on a regular basis when the temporary accommodation meets the need of the household and there is no suitable permanent stock available. They also flip tenancies when the TA has reached the end of its life, which is about five years.

**Fife Council** are in the process of flipping 650 properties from TA to permanent Scottish Secure Tenancies, at the cost of £1.5 million which will come from the General Fund. The problem the local authority is facing is that only one third of these households are in properties that meet their needs. The other two thirds are in the wrong property, either in terms of location or property type. Fife Council are considering how to meet the needs of these tenants.

**Glasgow** has made good progress in converting temporary tenancies into settled lets in the context of pressures on the supply of emergency and settled accommodation in their locality, converting 203 temporary furnished flats to settled lets since July 2020. However, the number of flats that can be converted to settled lets is highly dependent on the property being in an area, type and size suitable to meet the occupants housing need. Any flipping also needs to consider the balance between risk and need given the diversity of

issues LAs are required to manage. Risk may focus on MAPPA cases<sup>21</sup> or high-risk offenders including wilful fire raisers, whereas needs may focus on a suitable response disabled people with specific access requirements.

# **Bidding**

(Recommendation 8)

Survey responses from Homeless Network Scotland and Shelter Scotland outlined that choice-based letting systems and the requirement for regular bidding is difficult for people with limited or no access to devices or an internet connection in their TA and that many people stated they felt unable to complete various applications or bid without help and support to do so. Some people are also unaware of their rights and responsibilities around bidding, and on occasions people are given the wrong priority or have had their priority level removed. People can often be unaware of this or unclear on who to approach for advice. Common housing registers were acknowledged as a helpful step to reduce the burden on applicants to apply to multiple landlords and Perth and Kinross outlined their common allocation policy as enabling people to move on more quickly as it streamlines the application and allocation process.

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<sup>&</sup>lt;sup>21</sup> In Scotland the multi-agency public protection arrangements (MAPPA) brings together the Police, Scottish Prison Service (SPS), Health and the Local Authorities, in partnership as the Responsible Authorities, to assess and manage the risk posed for certain categories of offender. The purpose of MAPPA is public protection and the reduction of serious harm.

# Priority 3: Providing the support people need to move on

High quality, person-centred services with good regular communication and advice on housing options and support to navigate the housing system are crucial to enabling people to move out of TA into permanent accommodation as quickly as possible. It supports households to quickly access the right information about their rights and housing options, and thereby find and keep suitable permanent accommodation which meets their needs. It is dependent on the availability of suitable homes as well as an appropriately resourced local authority service, working in close partnership with the RSLs and voluntary sector partners in the local area. The principles and recommendations under this priority primarily focus on addressing the backlog of households in TA by supporting people to move on, however they could also help prevent homelessness and support people to avoid the need for TA in the first place, where this is appropriate.

Whilst the end goal is to reduce numbers in TA, the approach must also ensure that people's right to suitable TA which meets their needs is immediately met, linking people up with the required support as quickly as possible to enable a speedy journey through the homelessness system. This is particularly important for households with children where assessment and meeting of needs of the household through provision of appropriate TA and support can help mitigate the impacts of TA on children's health, wellbeing and development.

#### Recommendations

**Recommendation 9:** The **Scottish Government** should publish a review of funding of homelessness services, including any identified funding gaps and the provision of continued funding for RRTPs and Prevention of Homelessness. This should include a review of the funding model for TA<sup>22</sup>.

Current funding decisions and outcomes are opaque, and the statistics and evidence heard by the group outlines the different pressures facing different localities, which are not always linked to local authority performance. The Scottish Government and COSLA have already

<sup>&</sup>lt;sup>22</sup> Appendix 5 contains more information on this.

committed to develop a new and fairer TA funding framework, and the latest annual report on Ending Homelessness Together outlines a desire to provide greater clarity in budget documents as well as a funding formula that better represents 'the drivers of need in homelessness and recognises local authority efforts to reduce the use of TA.' <sup>23 24</sup>

**Recommendation 10:** Following the review, action should be taken to make changes to the funding of homelessness services to ensure they are funded sufficiently.

A lack of resources means local authorities are unable to deliver the high quality, trauma informed, person-centred service required to provide advice and support to people to move on from TA to appropriate permanent accommodation as quickly as possible, as well as preventing homelessness where possible. This can disproportionately affect people with multiple and complex needs, or certain protected characteristics, who might need tailored support to navigate the system.

**Recommendation 11: COSLA** and the **Scottish Government** should consider a focus on how to address the recruitment and staffing crisis across the housing sector.

This should include a recruitment drive, including supporting people with lived experienced to work on the front line where this is appropriate; engaging with skills development or recruitment organisations to recruit to this sector; and support to retain staff. The delivery of recommendation 10 should ensure that adequate resources are provided to local authorities to hire and train and fairly pay the required staff, to support recruitment and retainment and delivery of a high-quality service.

**Recommendation 12:** Health and Social Care Integration Authorities should ensure that Housing Contribution Statements detail what care and support provisions are the responsibility of Health and Social Care Partnerships and what are the responsibility of local authority housing teams.

There needs to be better collaboration between health and social care and housing. Housing Contribution Statements should express the mechanisms that exist to facilitate how health and housing will work together to ensure people move into settled housing that meets their needs, with continued support in place. Implementation of recommendation 12 will provide clarity on roles and responsibilities. It should ensure that people are adequately supported

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<sup>&</sup>lt;sup>23</sup> Scottish Government (2022) Ending homelessness together: annual report 2022

<sup>&</sup>lt;sup>24</sup> Note: Recommendations 14 and 15 also link to financing of TA.

which is essential to address the needs of the individual and enable people to move swiftly through their homelessness journey as well as preventing homelessness from happening in the first place.

**Recommendation 13:** The Scottish Government should work with **local authorities** to assess the current Community Care Grant process and make it faster to overcome the delays it can cause in moving people out of TA.

**Recommendation 14: COSLA** should undertake a benchmarking process on TA and there should be greater transparency on charges of TA by individual local authorities.

The benchmarking process would compare TA services and costs across local authorities. It should be a collaborative exercise between COSLA and local authorities, looking at what TA includes, what charges are made, and what is reasonable to charge.

Improving transparency around what local authorities charge for TA and what these charges include will inform discussions on what value for money looks like and will facilitate a shift towards a standardisation of TA charges across local authorities which should help make TA more affordable.

**Recommendation 15:** The **Scottish Government** should review the guidance to local authorities on setting charges for TA by clearly defining the terms "reasonable charge" and "affordable".

Reviewed guidance should help to ensure that individual circumstances are fully taken into account when setting charges.

The Task and Finish Group supports the HARSAG principles of approach to TA funding.<sup>25</sup> Recommendations 14 and 15 are in line with the HARSAG 2018 principle that rents of TA should be reduced to prevent those staying there from building up debt, and the recommendations should help ensure that TA is affordable to the households that live there and tackle the poverty trap. This poverty trap prevents people living in TA taking up employment, as this would mean that they would build up debt from the high TA charges no longer being covered by housing benefit. If TA is affordable to the households that live

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<sup>&</sup>lt;sup>25</sup> See appendix 5 and 6

there, this should enable households to move through the homelessness system and into a permanent home more quickly.

### The evidence we heard

### Lived experience

(Recommendation 9, 10, 11)

The group heard from people with lived experience of TA who highlighted significant issues with the quality and type of services which they had access to while homeless, which prevented them from moving out of TA and on to settled accommodation. These issues spanned from a lack of contact or negative interactions with staff, to difficulty in accessing support appropriate to their needs.

Lizzie shared how difficult she found it to get the support she needed. She found a disparity in the support she was offered by organisations, with some being more sympathetic and willing to help than others.

Thomas felt there is minimal support available to people in hostels, in particular that there was no support to help people access a permanent tenancy. He described that the only support he saw was staff checking whether someone was alive.

Rory described his experience of staff in the hostels he stayed in treating him 'like dirt' because he had a drug addiction. He said that when he asked to be given access to rehab, this was denied. He felt that staff in hostels need better training to support people with addictions and that there needs to be better support for people in hostels. He was eventually given his own flat but because of a lack of support to help maintain it, he lost it again.

Grant said that the support he received was key in helping him to move on from TA. Dennis was released from prison with no accommodation to go to. After his release, he managed to find a hostel to stay in where he remained for 8 months before he got vital support enabling him to find a home.

#### Recruitment

(Recommendation 11)

Local authorities highlighted the barriers to following through on the best practice initiatives and structural changes required because of low job retention in the sector, reduced staffing levels and recruitment challenges. For example, Fife Council has been unable to take forward some of their plans to mitigate the Unsuitable Accommodation Order (UAO) including converting hostel accommodation because of staff shortages in housing support disciplines following from the recruitment crisis.

Glasgow HSCP reported that RRTP funding was key in allowing them to put in a number of key posts to better match demand for services, and this meant frontline staff capacity was able to increase.

The recruitment policy in Wheatley group offers staff vacancies to tenants. This recruitment from a consumer base could be considered by other RSLs and LAs. One group member urged caution here emphasising that it can be inappropriate to employ people who have experienced trauma to support others experiencing similar trauma.

# **Housing options**

(Recommendation 10, 12)

Housing Options Scotland help people to navigate the housing system to find them permanent homes and, where there is an alternative, suitable outcome they have supported people to avoid homelessness and TA. They highlighted the importance of an individualised approach, as well as building relationships and trust when working with clients, to achieve positive housing outcomes.

#### **Funding**

(Recommendation 9, 10, 12)

When Supporting People was introduced in April 2003 the investment in support for vulnerable people increased dramatically. In 2005, a decision was taken by the Scottish Government and COSLA to de-ringfence the funding. Group members identified that this has resulted in a reduction in funding as overall budgets have been cut.

Shelter Scotland funded two full-time staff with a combination of clinical and housing expertise, within an acute hospital setting in Fife. The staff liaised with clinical staff to assess and provide support to patients prior to discharge (and follow up with them post discharge

if necessary), and local authority staff to help facilitate the provision of suitable accommodation. The intervention showed that having a mix of health and housing expertise within a hospital setting to support patients to have their medical and wider housing and support needs met can:

- lead to better use of healthcare resources
- offer a better way of working between hospital staff and housing staff, leading to better outcomes for people experiencing homelessness, and
- raise awareness of the wider issues faced by people experiencing homelessness.

# **Complex Needs**

(Recommendation 12)

The Scottish Government Coming Home Implementation Report from 2022 places duties on Health and Social Care to improve health and wellbeing outcomes for people with complex disabilities. The core outcomes for this work relate to meeting the housing needs for people who have complex needs and disability. This work will see the emergence of a Dynamic Support Register, National Support Panel, and Peer Support Network to activate these duties and improve the coordination of care and housing for people who have complex needs. This work will create opportunities and ownership for Housing, Health and Social Care to work together to design and deliver good housing outcomes that prevent homelessness and unnecessary institutional care.

#### **Community Care Grants**

(Recommendation 13)

Linda had been in TA for years. When she was finally offered her own tenancy, she was unable to move in for another six weeks until her Community Care Grant was processed as there was no furniture or white goods included.

Several examples were shared on how local authorities have overcome barriers caused by the length of time Community Care Grants take to be processed. Perth and Kinross set up new 'property ready' fund with goods turned around within a day; North Ayrshire Council have set up a furnished tenancy grant fund and Fife Council have placed two staff members in their Community Care Grant team to enable turnaround in two weeks. Glasgow have a fast tracking process for all homelessness community care grants and they are processed by Revenues and Benefits Section within a matter of days.

# **TA Financing**

(Recommendation 14, 15)

Legal Services Agency's research found that only four local authorities explicitly stated that they take individual circumstances into account when setting charges for temporary accommodation. This means that TA is often unaffordable for the households living there, especially if they are in work or education and so not entitled to housing benefit. The total debt owed by people living in TA in Scotland exceeds £33 million.<sup>26</sup>

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<sup>&</sup>lt;sup>26</sup> Legal Services Agency (2021) <u>Charges for temporary homeless accommodation in Scotland: law and reality</u>

# **Appendix 1: Remit and membership**

The Temporary Accommodation Task and Finish Group will consider how Scotland can turn the dial on the statistics with the aim of reducing the number of people living in temporary accommodation and the length of time they stay there.

All local authorities have rapid rehousing transition plans (RRTPs), which aim to reduce reliance on temporary accommodation (TA) as people are supported to keep the home they have or are placed into suitable permanent homes more quickly.

The group will consider existing good practice and learn from councils who are transforming the use of TA such as Perth and Kinross and those that have turned around challenges to provide TA such as Glasgow City Council.

It will assess what further ambition is required from RRTPs to transform the use of temporary accommodation, particularly for households with children. As part of its deliberations, the group will take account of the recommendations in the <a href="Improving housing">Improving housing</a> outcomes for women and children experiencing domestic abuse report.

The group will consider how it can engage with the Shared Accommodation Task and Finish Group which will consider what models of temporary and permanent accommodation will best meet the needs of people with multiple and complex needs.

The group will review other factors that impact on the use of temporary accommodation, including charging practices and affordability concerns, and identify any perverse incentives that may exist in current policy. To inform the discussion on funding models, the group will wish to take note of the recent <u>Legal Services Agency report on temporary accommodation charges</u> and the final report of the <u>Homelessness and Rough Sleeping Action Group</u>. The recent <u>Homeless Action Scotland report on Exclusion of People in Work from Homeless Services</u> is also of interest.

# Membership of the group

Alison Watson, Co-Chair (Shelter Scotland)

John Mills, Co-Chair (ALACHO and Fife Council)

Alice Tooms-Moore, Secretariat for the group (Shelter Scotland)

David Pentland (Scottish Government)

Janine Kellett (Scottish Government)

Karen Grieve (Scottish Government)

Louise Thompson (Scottish Government)

Sara White (Scottish Government)

Aaliya Seyal (Legal Services Agency (LSA))

Alison Kennedy (Change Team)

David Kidd (Homeless Network Scotland)

Emma Doyle (Public Health Scotland)

Faith Ougham (Change Team)

Gary Quinn (Glasgow City Council)

Gavin Yates (Homeless Action Scotland)

Gordon MacRae (Shelter Scotland)

Heather McCluskey (Centre for Homelessness Impact, CHI)

Janeine Barrett (North Ayrshire)

Ligia Teixeira (Centre for Homelessness Impact, (CHI))

Mike Callaghan (COSLA)

Nicky Brown (City of Edinburgh Council)

Ruth Robin (i-hub)

Ruth Whatling (Homeless Network Scotland)

Sarah Walters (Crisis)

Tyler Cary (Change Team)

# **Appendix 2: Evidence heard by the group**

**ALACHO**: John Mills (co-chair, ALACHO) presented on the financing of TA.

**Centre for Homelessness Impact**: Heather McCluskey (Practice and Partnerships Lead) presented to the group analysis of data on an overview of TA in Scotland. Heather also undertook in-depth analysis of TA in Edinburgh, Glasgow, Midlothian and Fife, and provided papers to the group.

**City of Edinburgh Council**: Nicky Brown (Homelessness and Housing Support Senior Manager) and Jill Thompson (Interim Head of Homelessness) presented on TA in Edinburgh.

**Fife Council**: Gavin Smith (Service Manager, Housing Access) presented to the group on Fife Council's allocation policy.

**Glasgow City Council**: Gary Quinn (Service Manager, Homelessness) presented on TA in Glasgow and gave insight on successfully addressing their historical breach of TA duties.

**Housing Options Scotland**: Moira Bayne (CEO) and Pedro Cameron (Homeless Housing Options Scotland Engagement Coordinator) presented to the group on their work to help people move from TA into permanent homes that meet their needs.

**Legal Services Agency**: Aaliya Seyal (CEO) presented on the cost of TA to an individual.

**Lived experience**: Lived experience of TA and homelessness was facilitated in several ways, including Change Team participants who were members of the group, and eight people with lived experience who shared their stories at the July meeting.

**North Ayrshire Council**: Janeine Barrett (Senior Manager, Homelessness and Community Safety) presented on the work which NAC have done on prevention, to reduce the initial need for TA. Janeine also delivered a separate presentation on the work North Ayrshire Council have done flipping TA tenancies into permanent homes.

**Perth and Kinross Council**: Martin Smith (Service Manager) presented on the council's work to transform their use of TA and to pioneer maximal housing options.

**Scottish Government, Better Homes Division**: Marion Gibbs (Team Leader on Homelessness) spoke to the group on the benefit and opportunities of Housing First as a route away from TA into permanent accommodation.

**Scottish Government, Homelessness Statistics Team**: Sara White (Head of Homelessness Statistics) presented to the group on the Scottish Government's homelessness statistics in relation to TA and provided additional data analysis.

**Scottish Government, More Homes Team**: Caroline Dicks (Head of Affordable Housing Supply Programme) presented to the group on the Scottish Government's Affordable Housing Supply Programme.

**Scottish Housing Regulator**: Michael Cameron (CEO) and John Jellema (Assistant Director of Regulation) presented on the challenges local authorities are facing, and on the work that the Scottish Housing Regulator does to engage with local authorities on provision of TA.

**Scottish Women's Aid**: Jo Ozga (Policy Worker) submitted a paper to the group on women's experiences of TA.

**Temporary Accommodation Standards Working Group:** Jim Hayton (Chair) presented on the work of the Temporary Accommodation Standards Working Group.

# **Appendix 3: Acronyms**

ALACHO – Association of Local Authority Chief Housing Officers

AHSP – Affordable Housing Supply Programme

B&Bs – Bed and Breakfasts

COSLA - Convention of Scottish Local Authorities

CEO – Chief Executive Officer

CHI - Centre for Homelessness Impact

HARSAG - Homelessness and Rough Sleeping Action Group

HNDA - Housing Need and Demand Assessment

**HOS – Housing Options Scotland** 

HPSG - Homeless Prevention and Strategy Group

HSCP – Health and Social Care Partnerships

LA – Local Authority

LHS – Local Housing Strategy

LSA – Legal Services Agency

MAPPA - Multi-Agency Public Protection Arrangements

RRTPs – Rapid Rehousing Transition Plans

RSL – Registered Social Landlord

SHR – Scottish Housing Regulator

SHIPs - Strategic Housing Investment Plans

TA – Temporary Accommodation

UAO - Unsuitable Accommodation Order

**UN – United Nations** 

# **Appendix 4: Recommendations for other working groups**

The Temporary Accommodation Task and Finish Group's remit was to consider ways to reduce numbers of households in TA and how long people spend there.

In reality, this remit necessarily touches on almost all aspects of homelessness policy and service delivery:

- prevention of homelessness stems the flow of households becoming homeless and thereby numbers of households requiring TA
- the period people spend in TA can be affected by staffing levels and quality and the communication and support people receive when they're experiencing homelessness
- the availability of the housing options available for people including social housing, the private rented sector, home ownership or specialised options like Housing First all affect how easy and quick it is for people to move on from TA and homelessness into a settled home.

Most of the recommendations and focus of the discussion by the group looked at how to address the current high numbers of households in TA by moving people on from TA more quickly. This is not to say that reducing the numbers of households going into TA is not crucial - and there were several discussions centred around the importance of prevention of homelessness as outlined below.

The group's priorities and recommendations set out earlier in the report are well aligned to its remit, however the group was clear that it did not want the valuable insight and recommendations to be lost and wanted to share this with other working groups as appropriate. The following recommendations will be shared with other task and finish groups and relevant working groups currently considering these issues:

- The **Prevention Task and Finish Group** and **Scottish Government** team working on the forthcoming prevention legislation should explore the following points:
  - As per recommendation 12, successful collaboration between HSCPs and local authorities, housing associations and the third sector has been identified by the Task and Finish Group as vital in preventing and tackling homelessness. Support via HSCPs was identified by HARSAG as a key factor necessary to the success of Rapid Rehousing. In order to sustain homeless households in appropriate TA, and to help them move onto permanent

- accommodation quickly, the integration of health and social care with local housing management is essential.
- Good practice from North Ayrshire Council's approach was shared with the group on very targeted early intervention and prevention work with partners.
- O More can and should be done to address the numbers of prisoners requiring TA. The Change Team recommended in 2022<sup>27</sup> that we can avoid people going into TA in the first place for example, when people are released from prison. More care needs to be taken, earlier in the process, to consider people's needs and choices so they are matched with a property which best suits them, avoiding the need for TA.
- The Scottish Government team progressing the housing bill could consider the
  opportunities to extend the National Acquisition Programme including as part of a
  pre-action protocol for private landlords looking to sell, as a mechanism to prevent
  homelessness.
- The Measurement Task and Finish group could consider the following data recommendation to better understand what households with protected characteristics require in each local authority area and whether policies are meeting the needs of these groups:
  - Standardised data should be gathered and published nationally on all protected characteristics and, specifically on disabilities and support needs and better evidence on children's experience.

This data would allow for better distribution of funding based on identified need.

It should be noted that this requirement for data links to the requirement for an equalities impact assessment to be carried out in relation to any new policies to understand their impacts on groups with protected characteristics, and for a Child Rights and Wellbeing Impact Assessment<sup>28</sup>.

 The Scottish Government should consider setting a deadline for the rapid phasing out of B&Bs.

<sup>&</sup>lt;sup>27</sup> Change Team Briefing (2022) All In For Change

<sup>&</sup>lt;sup>28</sup> Scottish Government (2021) Child Rights and Wellbeing Impact Assessment (CRWIA) Guidance

# **Appendix 5: The Financing of Temporary Accommodation**

The Temporary Accommodation Task and Finish group's final substantive meeting discussed the issue of financing and affordability TA. The Task and Finish group believe this area requires further work and suggest the **Scottish Government** and **COSLA** work together to see how to best take this conversation forward.

Affordability is one of the seven elements of the UN right to adequate housing. For the right to be fully realised in Scotland, and to prevent people from building up debt or being stuck in a poverty trap facing high charges if they take up employment, TA should be affordable for all households.

We recommend that the **Scottish Government** should set up a working group to take forward the work which this group has done to examine financing and the cost of TA.

Recommendations 14 and 15 made by the Task and Finish group cover some ground on TA financing, outlining that there should be a benchmarking process and greater transparency on TA charges, and that guidance should more clearly define the terms 'reasonable charge' and 'affordable'. Further, the Task and Finish group supports the HARSAG principles of approach to TA funding as outlined in appendix 6.

Additional longer-term solutions which could be explored by the working group include:

- Consideration of setting TA rents at Local Housing Allowance (LHA) equivalent, and phasing funding towards making TA free at the point of use by restructuring the funding model of TA.
- The 2014 Scottish Government review of TA financing<sup>29</sup> is refreshed, working with COSLA and the third sector, and is then brought back to HPSG in 2024.

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<sup>&</sup>lt;sup>29</sup> Hunter, J., Lindsay, T. and McMahon, J. (June 2014) Temporary Accommodation Modelling Review [produced for ALACHO and the Scottish Government, link unavailable]

# Appendix 6: HARSAG principles of temporary accommodation funding

The interim report of the Homelessness and Rough Sleeping Action Group<sup>30</sup> from May 2018 included a detailed section on the financing of TA including a set of funding principles, or recommendations. The principles were repeated in the final report of the group<sup>31</sup> and are copied below:

- The costs of homelessness and temporary accommodation should be a citizenfunded 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 an 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.

<sup>&</sup>lt;sup>30</sup> Scottish Government (May 2018), <u>Homelessness and Rough Sleeping Action Group: Interim report</u>

<sup>&</sup>lt;sup>31</sup> Scottish Government (June 2018), <u>Homelessness and Rough Sleeping Action Group: final recommendations report</u>



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