

Scottish Parliament: Social Justice and Social Security Committee

Homelessness and temporary accommodation

Submission from the Association of Local Authority Chief Housing Officers (ALACHO)

Parliamentary Evidence Statement

The Committee is keen to explore issues raised by a recent [Scottish Housing Regulator](#) report that highlights that some councils are finding it increasingly difficult to fully meet their statutory duties on homelessness, particularly providing temporary accommodation to people experiencing homelessness. It set out three main strategic challenges facing councils in providing services to people experiencing homelessness:

- dealing with the number of people in temporary accommodation
- maintaining an adequate supply of temporary accommodation, and
- ensuring homeless people have sufficient access to permanent housing.

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The number of people in temporary accommodation (statutory and making their own arrangements)

Evidence available to the Parliament shows Scotland is facing a significant housing access and homelessness challenge affecting homelessness and the availability of temporary accommodation (including households making their own temporary accommodation arrangements pending an offer of secure accommodation) The most recent statistics have been delayed but Scottish Government statistics for 2022/23 showed concerning increases;

- 39,006 homelessness applications, an increase of 9% on previous year and highest since records began.
- 32,242 households assessed as homeless or threatened with homelessness, an increase of 10%.
- 15,039 households in temporary accommodation, an increase of six per cent, and 9,595 children in temporary accommodation, an increase of nine per cent. It should be noted the full open caseload was 29,652 with around half of the 'caseload' making their own temporary arrangements
- An average of 223 days spent in temporary accommodation, up from 214 days the previous year and 175 days in 2017/18 when the series began.
- Presentations from a PRS tenancy have been dynamic linked to legislation changes. There was a low of 3,049 in 2020-21, (11% of all homeless households). Since May 2021, numbers have been increasing, reaching 2,990 across the first six months of 2022-23 alone (19% of all homeless households).

There can be no doubt plans to End Homelessness Together are going in the wrong direction despite the significant focus and effort by local authorities and their partners to deliver Rapid Rehousing Transition Plans. Positively, there is an increase in households accessing the social rented sector and repeat presentations has reduced over the last 5 years. Tenancy sustainment rates in social housing are at high levels with length of stay averaging 12 years compared to the Private Rented Sector which is around 3 years.

Monitoring and evaluation show there is not a uniform position across the country and homelessness pressures and challenges are not restricted to the urban authorities. While the declaration of Housing Emergencies in the major cities has been widely publicised, Argyll and Bute's declaration makes it clear that there is a strong rural dimension too.

Research work carried out by ALACHO provided evidence that most local authorities regard themselves at risk of breaching all or part of their homelessness duties on an ongoing basis. 12 are regularly reporting breaches of duty to provide temporary accommodation and Unsuitable Accommodation Order. This suggests Scotland is likely to see more Housing Emergencies declared in the coming months, Fife Council has recently publicly stated it is on the brink of declaring housing emergency.

While there are different perspectives on the levels of housing need across the country, recent research commissioned by Homes for Scotland suggest that levels are considerably higher than estimated through local Housing Needs and Demand Assessments. In addition, the 2024 Homelessness Monitor produced by Herriot Watt University and I-Sphere predict a 30% increase in homelessness over the next two years which should be cause for major concern. There is, however, general consensus within the sector that the shortage of housing supply in the country has contributed, and continues to contribute to, the growing number of people experiencing homelessness in various ways.

The lack of affordable and adequate housing options has resulted in many individuals and families being placed in temporary accommodation. More worrying is the upward trend in the number of households unable to exercise this fundamental right as more local authorities reporting statutory breaches due to the lack of temporary accommodation and permanent move on options for statutory homeless households. The two issues are inextricably linked.

- Growth in temporary accommodation often means diverting properties from mainstream housing allocations and therefore not available as permanent homes
- Constraints in housing supply create significant 'bottlenecks' in temporary accommodation and people spending longer in 'limbo' situations and restricting the flow through temporary accommodation

Any reduction, or interruption, to the supply of social, affordable or other housing options will have a direct, negative and profound impact on the number of households likely to experience homelessness. Many local authorities and other landlords are still recovering from the pandemic and post pandemic impacts on the building and construction industry. The challenges presented by direct reductions in

the investment programme present further issues with genuine sector concern about delivery of Housing 2040 milestones and ambition.

Supply of Temporary Accommodation

It should be clear that temporary accommodation is no longer an environment of emergency shelters, institutional dormitory style hostels and other dated models of provision as most is 'normal' properties in the community. The provision, funding and management of temporary accommodation varies considerably. The national increase in the use of bed and breakfast / hotel type accommodation as well as other forms of Unsuitable Accommodation is a growing concern from a personal wellbeing, safeguarding perspective. There is also a strong financial issue for pressurised local authority homelessness budgets.

Although the situation varies considerably across Scotland, evidence provided by Shelter, other industry sources and supported by ALACHO show that the vast majority of households experiencing homelessness do not have significant and complex needs with around 80% assessed as having no or very limited / short term support needs. Equally, the number of people reporting enduring or occasional rough sleeping is relatively consistent and still relatively low level in most places (with some exceptions), however, there is a growing experience of households making short term, transitional arrangements. This highlights the importance of housing led responses to homelessness and the supply gap is perpetuating homelessness, creating an element of migration from mainstream housing access systems.

Any experience of homelessness or being at risk of homelessness has a negative impact on employment, education, health and wider circumstances causing lasting trauma and disadvantage. However, there is a breadth of industry evidence that demonstrates that some societal groups are more likely to be affected with the Homelessness Prevention Strategy Group identifying the most likely groups as Veterans, those experiencing domestic abuse, people leaving prison or being discharged from hospital and care experienced young people. Pressures on temporary accommodation and housing supply are limiting the ability to deliver services to these groups and compounding wider public sector pressures on prisons, hospitals as well as health, social care and wider services in the community.

There is also a minority but a significant proportion of those that present with complex needs and/or challenging behaviours also require specific and particular multi-agency responses (including accommodation based responses) to prevent and respond to homelessness. Local responses require effective engagement through local Health & Social Care Partnerships, community based services and a range of other stakeholders to bring together housing, health and social care responses. Pathfinders and other initiatives demonstrate that programmes such as Housing First can make an impact in the long term, it is hoped that the Ministerial Oversight Group and the forthcoming Housing Bill containing a Homelessness Prevention Duty on public bodies will support a more holistic approach to people experiencing homelessness with specific needs.

While the Prevention Duty brings some anticipation that a more collective responsibility for a consistent and holistic approach to homelessness prevention, there continues to be considerable uncertainty around the guidance and resourcing of this. There is also sector based concern that this could exacerbate an already overheating system.

Homeless people have sufficient access to permanent housing

The Scottish Government recognises the urgency of addressing this issue and has implemented various measures to tackle homelessness and improve housing supply. These include funding for affordable housing, supporting the development of RRTPs / homelessness interventions and efforts to provide more social housing within the context of Housing 2040.

However, more needs to be done to ensure that everyone in Scotland has access to safe and stable housing. This requires a collaborative approach involving the government, local authorities, housing associations, and other stakeholders to ensure housing options are available across tenures with an urgent focus on short term housing supply mechanisms.

A national acquisitions policy will have an impact, particularly within the context of a predicted reduction in the Private Rented Sector, but there are real sector concerns around the future of the Affordable Housing Supply Programme and other affordable options.

The sector is still considering its response to the Scottish Government Budget, but it is likely that this will lead to, or have a significant contribution to, reductions in the Affordable Housing Programme creating a direct impact on homelessness in multiple ways.

The Private Rented Sector can play an important part in preventing homelessness and as a response but challenges around access, affordability, standards and wider issues are creating challenges for local authorities. The sector is working to anticipate changes to PRS legal protections at the end of March with many local authorities predicting significant increases in homelessness presentations as landlords look to exit the sector or end tenancies. The Chartered Institute of Housing and Fife Council are currently completing work around the Private Rented Sector environment and will publish this in March 2024.

The significant message from the sector is that any threat to the delivery and supply of new social and wider affordable, secure housing options is going to undermine efforts to prevent and end homelessness. The consequence will inevitably be that more households face longer stays in temporary accommodation and homelessness will become a housing option rather than the safety net it is intended to be. Local Authorities are already recognising a level of migration from mainstream housing lists to homelessness due to lack of prospects or inability to wait or sustain accommodation arrangements.

Summary

- Any reduction, or interruption, to housing supply will have a direct, negative impact on homelessness, including the supply of temporary accommodation, and the ability to provide positive outcomes for households. Investment, building and construction industry capacity, supply of land and infrastructure as well as other factors could all contribute.
- While the biggest impact would be felt in the supply of social housing, the operation of the private rented sector can increase homelessness or be part of a housing options based response. Local authorities are preparing for an impact of increased evictions following the 31st March.
- The risk of homelessness has negative impacts on physical and mental health for most households. Taking up temporary accommodation creates significant potential to fracture employment, education and social connections to the detriment of individuals and families.
- Pressures on temporary accommodation can make it very difficult to maintain and sustain households within local areas, potentially with lasting damage and trauma impacts. It should be noted that the vast majority of households that present to local authorities for homelessness assessment have low, or no, housing support needs although a minority customers may have a spectrum of needs. Needs will vary across the country and RRTPs provide the vehicle for local authorities to plan for local needs.
- There has to be a focus on increasing short term housing supply as the primary response to reducing homelessness and improving outcomes for homeless households.
- Approaches to improve prevention are likely to help in the longer term but there is a legacy issue across a number of local authorities that need to respond to.