



Beyond 2021 housing policy - response from Crisis November 2018

Crisis is the national charity for homeless people. We are dedicated to ending homelessness by delivering life-changing services and campaigning for change. Crisis recently published a ground-breaking Plan to End Homelessness, *Everybody In: How to end homelessness in Great Britain*. This sets out the actions needed to end homelessness for good in Scotland and across Great Britain. The recommendations in the Crisis' Plan for Scottish Government have significant cross-over with the recommendations of the Scottish Government's Homelessness and Rough Sleeping Action Group.

Ending homelessness is morally the right thing to do, particularly in a society that wants to prioritise fairness and social justice. The cost of implementing the solutions set out in the Crisis' Plan would be £616 million over the first ten years of implementation, according to research conducted by PwC. The benefits generated would amount to £1,670 million, over the same time period, primarily as avoided costs to local authorities, but also in savings to wider public services, improved wellbeing and economic output.

This response identifies the key areas that need to be addressed in housing policy to support the ambition of ending homelessness in Scotland. We understand that there will be an ongoing consultation process during 2019, where we will respond in greater depth on the core issues relating to homelessness and housing.

Key points

- Measures to tackle poverty must cover single people as well households with children in order to support work to prevent homelessness.
- The ambition to end homelessness needs to be integrated into the National Performance Framework.
- Success in ending homelessness should be a key indicator of the success of future housing policy in Scotland.
- Everyone can and should be housed; nobody should have to qualify for it or prove that they are 'housing-ready'.
- The commitment to ongoing investment in affordable housing supply is to be welcomed. Future iterations of the Programme need to be carefully targeted to ensure that new supply is located in the areas with greatest need.
- The definition of affordability in relation to housing must be comprehensive to ensuring everyone in Scotland can access housing regardless of their income.
- Successful housing policy must address the support required to maintain housing
- Housing policy must specifically address the housing needs of groups particularly at risk of homelessness, including young people.

- The right to access housing needs to be embedded across a wide range of policy and practice, including health, social care and the justice system.
- Work on improving public understanding and attitudes towards homelessness will require a sustained effort to effect cultural shift.

Projecting homelessness in Scotland

Research commissioned by Crisis shows that, without intervention, the worst forms of homelessness (rough sleeping, use of night shelters, unsuitable temporary accommodation, sofa surfing) will increase by 43% between 2016 and 2041. We therefore strongly welcome the Scottish Government's acceptance of the recommendations of the Homelessness and Rough Sleeping Action Group and the Beyond 2021 housing policy discussion. We warmly welcome the recognition of homelessness as one of the top 10 priorities for this discussion.

Across Great Britain, while preventing further welfare cuts would have the biggest impact on reducing this increase (reducing the projected increase by 47% by 2041), adopting a policy of maximising the prevention of homelessness and increasing housing supply and were shown to have major impacts, of 40% and 35% respectively¹. Greater economic convergence between the different parts of Great Britain was also shown to have a significant impact on reducing the numbers of homeless people.

This demonstrates the relationship between homelessness, economic wellbeing and poverty. It is important that measures to tackle poverty support not just households with children but also single people, who make up the majority of homeless people in Scotland.

Ending homelessness as an ongoing, strategic commitment

Crisis warmly welcomes the Scottish Government's commitment to ending homelessness. It is important to recognise that ending homelessness is not a one-off event. The ambition must be maintained over time, ensuring that policies do not increase the risk of homelessness for the population in the future, and seek to prevent homelessness wherever possible.

Failure to consider the implications of policy decisions for homelessness has undermined work to eliminate homelessness in the past, with the recent dramatic rise in rough sleeping in England being a prime example, despite the success of the Rough Sleepers Initiative a decade earlier. The Scottish Government's Ending Homelessness Together Action Plan (EHTAP) covers the period up to 2023. It will be critical to maintain an ongoing focus on ending homelessness beyond the lifespan of the Action Plan, and we welcome the commitment to this in the Beyond 2021 consultation discussion document.

The ambition to end homelessness needs to be integrated into the National Performance Framework, and we welcome the first steps towards this in the EHTAP. Progress in ending homelessness should be a key measure of the success or failure of future housing policy. Scotland has been lauded for its world-leading legislation, but Scotland is of a size

¹ Bramley, G (2017) Homelessness projections; Core homelessness in Great Britain

where it is possible to join up policy and practice effectively to ensure we have the best policy and practice to end homelessness altogether.

Housing policy is critical to ending homelessness. Supply is a key issue, but housing policy must be about much more than physical infrastructure. Crisis believes that everyone can and should be housed; nobody should have to qualify for it or prove that they are 'housing-ready'. The two keys to ending homelessness are

- to prevent it happening in the first place, and
- to rehouse homeless people as rapidly as possible in appropriate housing, which they can afford, with adequate support to maintain their housing.

All housing policies post 2021 need to ensure that they support these two goals.

While sufficient supply is vital to provide an adequate range of housing options that are quickly accessible, for people who are homeless or at risk of homelessness this also involves support to sustain housing and joining up services so that there are clear pathways for all people to access housing that is affordable and meets their needs.

There is substantial scope to broaden the focus of the draft principles developed for the Beyond 2021 housing policy (p12 of the discussion document), particularly in the principles looking at homes that meet people's needs and at a well-functioning housing system. A key test of all housing policy must be that it does not lead to homelessness.

Homes that meet people's needs

A wide range of housing options should be available to households in Scotland to offer choice and adequately meet people's needs. We welcome the Scottish Government's commitment to the Affordable Housing Supply Programme and extending this beyond the current phase. To maximise the benefit of the investment, this needs to be carefully targeted to ensure that it is located in the areas with greatest need and that supply is available to meet the numbers of people who homeless locally.

In the private rented sector, rents are rising steeply in some Scottish housing markets. Rent Pressure Zones are only a stop gap measure, and rent rises need to be linked to inflation to protect people in high pressure market areas.

Housing policy should also support the work to minimise the use of temporary accommodation for homeless households and rehouse people rapidly into settled accommodation.

Definition of affordability

Scottish planning policy currently defines affordable housing as 'homes affordable to people on modest incomes'². In terms of prioritising settled homes for all, this is not an adequate definition, as it does not adequately cover people on low incomes. Analysis by Crisis and the Chartered Institute of Housing shows that in a number of areas of Scotland,

² Scottish Government (2014) Scottish Planning Policy. Scotland: Scottish Government. (paragraph 126)

many low income households will struggle to afford housing and live at an adequate standard of living. Lothian, Great Glasgow and the Perth and Kinross regions are particularly unaffordable for different household types.

With an increasing gap between what housing benefits will cover and actual rents, there needs to be a much more robust definition of affordability. This will also encourage realistic and informed debate about the range of housing options that are needed in local areas and ensure that a future Affordable Housing Supply Programme can meet the needs of those people in Scotland at greatest risk of homelessness through poverty and low income. Consideration should be given to linking the definition of affordability to the support for housing costs available through the benefit system. This would provide a comprehensive safety net and ensure that all people in Scotland can afford housing.

A housing system that enables people to sustain their home

To prevent and end homelessness, housing policy cannot be addressed in isolation. Individuals' housing needs are deeply entwined with other issues in their lives, and services need to reflect this. For example, young people are disproportionately at risk of homelessness. People aged 16-24 make up 13% of the Scottish population³, but 25% of homelessness applicants. Housing affordability can be a particular issue for them because of restricted access to support through housing benefits and lower wages, and some may not have developed the independent living skills to adequately maintain their housing. Consideration should be given within housing policy to pathways for young people to enable them to access affordable housing and maintain a tenancy and reduce the risk of homelessness, just as consideration is given to the ageing population and disabled people.

For some people, adequate support is critical to achieve the Scottish Government's ambition that "We want everyone in Scotland to have a home that is warm, affordable and accessible". Half (47%) of homeless applicants now have support needs, rising from 34% just four years ago. Most of these support needs relate to mental health problems or basic housing management or independent living skills⁴. Consideration of housing support needs to be embedded into housing policy and practice to ensure that the achievement of this goal is meaningful and that people do not become homeless because they are unable to maintain their homes.

For other people their housing pathway needs to join up with their interaction with other services, such as the care system, healthcare or the judicial system. The EHTAP seeks to develop pathways for people at high risk of homelessness when leaving institutions. Similarly, court sentencing and remand practice can undermine the stability of someone's housing situation, and lead to much longer-term problems associated with homelessness. The right to access housing needs to be embedded across policy and practice in these spheres at both national and local level.

Understanding and attitudes towards homelessness

³ National Records of Scotland (2018) Mid-2017 population estimates

⁴ Scottish Government (2018) Homelessness in Scotland 2017/18

A key factor in embedding homelessness prevention and relief as a priority in a wide range of national and local policies and procedures is ensuring good understanding of what homelessness actually is. Research suggests that there are a range of stereotypes around what homelessness is and fatalism about what can be done to tackle and prevent it. Improving understanding of the breadth of homelessness, the way that systemic factors can interact and increase the risk of homelessness, and what might be meant by homelessness prevention, can help to make sure that policy and practice is “homelessness-proofed”. We therefore welcome the action in the EHTAP to develop a “groundswell of wide support to bring about a sustainable end to homelessness and rough sleeping”. Crisis commissioned the Frameworks Institute to examine the most effective ways to frame homelessness⁵ and this is mentioned in the EHTAP. We would be happy to work with the Scottish Government in taking this work forward. This is a long-term project which will need sustained effort beyond the lifetime of the EHTAP.

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⁵ <https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/services-and-interventions/reframing-homelessness-in-the-united-kingdom-a-frameworks-messagememo-2018/>