



## A consultation on improving standards in temporary accommodation Response from Crisis

August 2019

### Introduction

Crisis is the national charity for homeless people. We are dedicated to ending homelessness by delivering life-changing services, including our Crisis Skylight service working with over 700 homeless people a year in the Lothian region, as well as ten other locations around Great Britain. These offer holistic support across a whole range of issues, including support to secure access to adequate and affordable housing and employment support to help people prepare for, find, sustain and progress in work. Ensuring that homeless people can get access to affordable, decent, secure housing is central to our services for homeless people. We also work with local authorities across Scotland to embed best practice, and campaign to end homelessness for good.

### Campaigning to end the use of unsuitable accommodation

Crisis has been campaigning for an end to the use of unsuitable temporary accommodation (UTA) for all homeless people except in emergency circumstances for a number of years. Our *Life in Limbo* campaign calls for an extension of the Unsuitable Accommodation Order to all homeless households, so that no one has to stay in unsuitable accommodation such as bed and breakfast (B&B) and unsupported hostels for more than seven days. This campaign was borne out of the experiences of our clients, many of whom experience long stays in B&B without access to basic facilities and struggling to participate in normal activities such as having family to visit or maintaining employment.

We recognise that many local authorities have reduced or indeed eliminated the use of unsuitable accommodation, but a small number of areas continue to use it, primarily for single households. Having abolished priority need in Scotland, the ongoing legislative discrimination between families and single people in the Order must be removed.

Our campaign was developed in discussion with the wider homelessness sector and local authorities. We held roundtable discussions with both these groups in March 2017 and again in July 2019 to inform our policy development. We also carried out research on the experiences of people living in this type of accommodation in seven local authority areas, speaking to people primarily in B&B accommodation<sup>1</sup>. People had unmet support needs, did

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<sup>1</sup> Sanders, B, with Reid, B (2018) 'I won't last long in here': Experiences of unsuitable temporary accommodation in Scotland. Crisis.

not have access to basic facilities, did not feel safe and faced restrictive rules which limited their ability to maintain a normal life.

#### *Support needs*

- Almost three-quarters (70%) of respondents reported having an alcohol or drug dependency issues at some time in the past. This compares to 24% of homeless applicants in 2017/18 with a current support need relating to alcohol or drug dependency
- 89% of respondents declared that they needed support with finding permanent accommodation, but over half (54%) did not receive any

#### *Facilities*

- 45% had no access to a kitchen and 34% had no access to a fridge. As a result, 55% had gone without a meal
- 47% had no access to laundry facilities

#### *Safety*

- 50% of people said they felt unsafe in unsuitable accommodation. Of these:
  - 78% of these because of criminal behaviour of other residents
  - 65% reported other forms of anti-social behaviour such as knocking on doors or being asked for money
  - 60% felt threatened by the behaviour of others
  - 32% said they felt their room was not secure
  - 35% said staff did not intervene to prevent the antisocial behaviour of other residents
- 88% said they experienced depression and almost all said it got worse during their stay

#### *Restrictive rules*

- 74% could not have family or friends come to visit. 81 per cent of those with visitor restrictions had worsening relationships with others compared to 39 per cent of those without those sorts of restrictions
- 84% experienced a ban on pets
- 49% could not spend a night away
- 41% had restrictions on access to basic facilities (bathroom, kitchen, laundry)
- 58% of those who had to abide by curfews in their accommodation experienced worsening relationships compared to 42% of those without curfews

To supplement this consultation, Crisis provided a means for people with lived experience of homelessness to submit their own experiences directly to Scottish Government, 25 people did so. Members of the public in support of Crisis' campaign also submitted responses to a shorter version of the consultation questions; these too have also been submitted to Scottish Government.

The findings from our research and work related to this consultation are stark. Having sought help from their local authority, people are being placed in accommodation that is not appropriate for sustainable living. People reported not feeling safe, a lack of facilities, a lack

of privacy, drug use on the premises and insect infestations. There were descriptions of bed sheets spattered in blood and a landlord going through someone's personal possessions. Some people stated they would prefer to sofa surf or would not seek help in the first place, knowing what temporary accommodation options are available.

*"I was in a B&B for 7 months. I was subjected to continuous antisocial behaviour, witnessed physical violence and prolific drug use. My food was stolen regularly which left me struggling to feed myself as I am on benefits. There were many occasions where I was afraid to leave my room. Due to me being constantly on edge I never slept well. It was a highly stressful period which negatively affected my health. I am now living in temporary accommodation."*

*"After one year living in many different temp hostels/B&B/hotels I can state that the experience is soul destroying... You are given no time limit when you will have to go back into the council to be moved to another property. You are given places that are unsafe for human habitation, one place I went to the mattress was full of urine... there are no cooking facilities in these places, so you are forced to eat from kettles, you are forced to be locked in from 11 at night that makes you feel like some sort of prisoner. Most staff are rude, uncompassionate, bend the rules and generally look down on you. They mix the places up with the most unstable people you can imagine, one person that stayed in a place ended up being sectioned, the council have no strategy in placing vulnerable people away from some of society's most dangerous individuals in these places. All in all, my experiences have definitely left a lasting impression on me and mentally scarred for life."*

Respondents to lived experience consultation

### **Ending the use of unsuitable accommodation in Scotland**

Our recommendation on extending the Unsuitable Accommodation Order was taken up by the Homelessness and Rough Sleeping Action Group (HARSAG), along with their recommendations on developing enforceable standards for temporary accommodation. The use of B&B was also the top issue that came through the Aye We Can research with people with lived experience of homelessness from around Scotland for the HARSAG.

We warmly welcome the opportunity to respond to this consultation. The primary focus in our response is on the effective extension of the Unsuitable Accommodation Order, and we propose a definition which we believe would accomplish this.

Some principles informing this consultation response:

- The Unsuitable Accommodation Order is a backstop to eliminate the use of the most detrimental forms of temporary accommodation, except in emergency circumstances. This should intersect with the development of enforceable standards to raise standards in temporary accommodation generally.
- "Unsuitable" is not simply related to location and facilities. Many of the people placed in this type of accommodation have high support needs, yet little access to support and no trained staff on site, which makes the accommodation unsuitable for both

them and other residents. The definition of unsuitable should address these issues and ensure support needs and accommodation are matched appropriately.

- Ultimately, there should be a strategic moving away from a model of temporary accommodation, as much as possible. Therefore, ending the use of unsuitable temporary accommodation must be aligned with plans to transition to rapid rehousing, increase the range of permanent housing options available and preventing homelessness to the greatest extent possible.

## Section 2: Unsuitable Accommodation Order

### 1. Options to extending the unsuitable temporary accommodation order

Crisis believes that the Scottish Government should extend the Unsuitable Accommodation Order to all homeless households from an agreed date (option A). Option C, to not extend the Order at all, is not an acceptable option. There is widespread consensus amongst people experiencing homelessness, the third sector and local authorities that the law needs to be extended to prevent people having to live for more than a week in accommodation that is unsuitable and, in some cases, dangerous and detrimental to health and wellbeing. Legislation should be brought in to enact the extension during the 2019/20 parliamentary year.

*"Yes, I feel this should be extended as young vulnerable [people] or men and women who are vulnerable but because they have no children they deserve less help? How does that sound ok? I know men who had to sofa surf for 10+ years due to the lack of support for them."*

*"I think that this should apply to everyone. It was soul destroying spending 7 months in a B&B particularly as I was told it would be 3 months maximum. This had a negative impact on both my physical and mental well-being and I imagine this is how it impacts most people in this situation."*

Respondents to lived experience consultation

### 2. Date for implementation

Crisis believes that the date for implementation needs to be as soon as reasonably possible, based on consultation with local authorities. Most local authorities have minimised their use of unsuitable temporary accommodation already. Those that still have it have, in the main, planned to eliminate or reduce its use through their Rapid Rehousing Transition Plans (RRTPs). We believe it will be reasonable for almost every local authority to end the use of unsuitable bed and breakfast accommodation beyond a seven-day maximum period within two years. We note that a future implementation date should not prevent the Order being legislated for during 2019/20.

### 3. Options for incremental implementation

There must be a clear, articulated date by which legislation is implemented. We believe it will be reasonable for almost every local authority to end the use of unsuitable bed and breakfast accommodation beyond a seven-day maximum period within two years. In our view Option A can allow for incremental implementation over time, and local authorities can choose to implement the Order incrementally prior to the implementation date if that is appropriate in their area. So we do not believe option B, to introduce the Order incrementally, is necessary.

*4. Which option is the best way to avoid breaches of the Order?*

Whichever way the Order is brought in, there must be a clear point at which no homeless household is placed in unsuitable temporary accommodation. The focus must remain on the experiences of homeless people having to make use of temporary accommodation. The key to avoiding breaches is ensuring an appropriate timescale for the implementation of the Order, while doing it as soon as reasonably possible to end detrimental stays in unsuitable accommodation. We further discuss what is required to prevent breaches, support local authorities and ensure compliance with the Order under question 10.

*5. Positive impacts of extending the restriction*

Crisis believes that homelessness can and should be ended in Scotland. Core to what this means is that no one should live in emergency accommodation, such as shelters and hostels, without a plan for rapid rehousing into affordable, secure and decent accommodation. Therefore ending the extended use of unsuitable accommodation is key to ending homelessness in Scotland.

Analysis commissioned by Crisis from PwC suggested that if everyone placed in unsuitable temporary accommodation in 2018 was moved out of it within 7 days and into supported accommodation, there would be a saving of £29 million in that year alone<sup>2</sup>. This suggests that there could be considerable savings to local authorities by moving away from the use of unsuitable temporary accommodation.

Most importantly, Crisis' research demonstrates the negative impact unsuitable temporary accommodation can have on residents, in relation to their physical and mental health, their sense of safety, and their ability to maintain a normal life, including cooking for themselves and accessing laundry facilities. Effective extension of the Order will mean that no one has to stay in this type of accommodation for more than a week, and that all households in temporary accommodation will have access to basic facilities and support to ensure they can maintain a reasonable standard of living during their journey out of homelessness and that their situation does not deteriorate. Ending the use of unsuitable temporary accommodation will enable people to move on with their lives more effectively.

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<sup>2</sup> Crisis (2018) A Life in Limbo: The cost of unsuitable temporary accommodation for homeless people in Scotland

As discussed below, extending the Order must be strategically prioritised and fully integrated into the wider work of local authorities, in particular the implementation of Rapid Rehousing Transition Plans (RRTPs), changes to intentionality and local connection, the development of Housing First, Local Housing Strategies (LHSs) and Strategic Housing Investment Plans (SHIPs), and this should be considered in scrutiny work.

There also needs to be a much stronger focus on preventing homelessness, ultimately through a new duty on local authorities and other public bodies to prevent homelessness. This should result in a significant reduction in the number of households requiring homelessness assistance, including temporary accommodation.

Embedding the Order in this way and aligning it with wider activity to reform the homelessness system will publicly demonstrate the ambition in Scotland to end homelessness and eliminate the worst experiences of people in the homelessness system.

#### *6. Negative impacts of extending the restriction*

Although a small number of local authorities continue to use unsuitable temporary accommodation, for many authorities across Scotland restricting the use of unsuitable accommodation will have little or no implications. Those that do are already planning to reduce their reliance on this form of accommodation through their RRTPs.

Extension of the restriction without an effective compliance regime will mean that people will continue to have to live in unsuitable and even harmful conditions. However, extension of the Order is essential to raise standards and ensure no one is in accommodation which is unsafe, lacks basic facilities and constrains ordinary living. Getting the definition, implementation timescale and compliance regime right will ensure these negative impacts are minimised.

Crisis sees the extension of the Order as a backstop to eliminate the most unsuitable and detrimental forms of temporary accommodation except in an emergency. Wider issues with temporary accommodation should be addressed through the development of enforceable standards which apply across all forms of temporary accommodation, and a substantial reduction in use of temporary accommodation so that people find permanent housing solutions much more quickly through the rapid rehousing approach.

#### *7. Definition focused solely on location and facilities?*

Location is an important aspect of ensuring accommodation is suitable. If people are housed far away from friends and family, or away from services they regularly need to use, this will be detrimental to their wellbeing. Part 5b of the current Order refers to this, and this should remain. In addition, consideration should also be given to access to social care needs, employment and social networks.

The proposed changes to local connection mean that the part of the current Order which states that suitability means within the local authority area (5a) may become redundant. As long as people can access the services and support they need, then it may be appropriate to place people outwith the local authority area. However, it will be important for local authorities to consider and monitor how the proposed changes to local connection impact on the use of temporary accommodation, particularly in high pressure areas which already have high use of unsuitable accommodation.

Access to basic facilities is also a key issue which came through our research, particularly fridges, kitchens and laundry facilities, so this must continue to be part of the definition. The current Order refers to toilet and personal washing facilities, cooking facilities and the use of a living room.

Crisis does not believe that exclusive access to toilet and personal washing facilities, i.e. ensuite facilities for every bedroom should be addressed through the extension of the definition of unsuitable temporary accommodation. While this should be given serious consideration in the development of standards for temporary accommodation, at this stage we believe that it could limit the use of temporary accommodation that is suitable in every other way, and also restrict the use of small-scale shared options which have been successfully used by some local authorities, particularly Aberdeenshire and Highland, to move away from the use of unsuitable B&Bs.

In addition, our research identified three other areas that are problematic. These are:

- a. Lack of support, especially where there are people in the accommodation with high support needs
- b. Not feeling safe (largely to do with the number and range of other people in the accommodation)
- c. Restrictive rules and lack of appropriate rights, including not being able to have visitors or stay elsewhere overnight

To tackle these, Crisis therefore believes that unsuitable accommodation for households that do not contain children should be defined along the following lines:

- a) Does not meet minimum accommodation safety standards, including wind- and watertight, electrical and gas safety, etc.*
- b) Is not in the locality of facilities and services for the purposes of health, education social care which are being used or might reasonably be expected to be used by members of the household, taking into account travel time including by public transport*
- c) Is not within reasonable distance of the household's employment and social networks, taking into account travel time including by public transport*
- d) Lacks adequate access to cooking, toilet, personal washing and laundry facilities, based on standards in current HMO regulations. (Access to laundry facilities might include financial support for laundrettes if there are no facilities onsite). Lacks adequate bedrooms for the exclusive use of the household.*

- e) *Is not suitable for the housing, health and social care needs of the household. This should include matching of needs with other residents*
- f) *Where the household has access to non-resident children, is not suitable for children to visit*
- g) *For accommodation containing three or more households, does not meet management standards. These should include:*
  - o *A clear occupancy agreement and framework of rights allowing the household to reasonably use the accommodation as a home for the duration of the occupancy agreement, including adequate notification of the staff entering the space the household occupies, the right to spend nights away from the property, ability to access the property in line with employment hours, reasonable rules around curfews*
  - o *Where occupants have support needs not related to housing, onsite support meeting Scottish social care standards should be provided, appropriate to the needs and numbers of residents*

(Note, the purpose of point (g) is to ensure that appropriate small scale sharing, and community hosting options are not ruled out by the Order.)

#### *8. Same definition for all households?*

Crisis has proposed a definition above, which is focused on the needs of households without children. As discussed, Crisis does not believe the same definition is appropriate for all households. For example, while it is clearly inappropriate for a household with children to share bathroom facilities with others, this may be reasonable for a single person, particularly in otherwise good quality accommodation. Accommodation which is not appropriate for a household with children (including non-resident children) may be suitable for a household made exclusively of adults who do not have access to children.

#### *9. Exemptions*

We recommend that accommodation is exempt from the Order if it is subject to the Care Inspectorate. This would avoid duplication of regulation as there are already environmental and support standards in that inspection regime, and hostels and supported accommodation would already need to meet these standards.

In a person-centred system, there should be an exemption to allow people choice over the accommodation, as contained in the current Order. For example, some people may choose a B&B or a hostel if there are no other options.

#### *10. Measures to avoid breaches, support local authorities and ensure compliance*

It will be important to have a clear and effective framework in place to ensure compliance, to protect people at a vulnerable time, and demonstrate that the conditions that some homeless households are having to endure are unacceptable in Scotland. Some of the experiences reported to us by people living in unsuitable accommodation are unsafe and almost certainly in breach of contract conditions and existing legal requirements, yet several people with lived experience responding to the consultation pointed out that some people do not feel comfortable or confident reporting poor or unsafe conditions.



There should be a tiered approach to support, and sanctions for when support has proved ineffective or for severe breaches. This should include scrutiny and reporting from the Scottish Housing Regulator (SHR) and Scottish Government, or guidance, direction and improvement support to help identify alternatives to unsuitable accommodation. Stronger support and indeed funding for alternatives like community hosting, social letting agencies, law change to allow sharing in social tenancies, use of resident landlords and lodging arrangements as an alternative form of temporary accommodation, etc, may be required in some areas.

If progress is not made, improvement orders for the local authority, or orders preventing the use of, or requiring the improvement or closure of, certain premises may be needed.

Improvement support for local authorities should also address the whole housing and support system and not just the homelessness service. Work to tackle the use of unsuitable accommodation must be strategically prioritised and fully integrated into the wider work of local authorities, in particular the implementation of Rapid Rehousing Transition Plans (RRTPs), changes to intentionality and local connection, the development of Housing First, Local Housing Strategies (LHSs) and Strategic Housing Investment Plans (SHIPs), and this should be considered in scrutiny and improvement work.

Local authorities should be looking at a wide range of permanent and temporary accommodation options to alleviate homelessness. Use of the private rented sector, mid-market rent, shared housing and empty homes should be maximised, along with social lets to homeless households. While all local authorities should be seeking to reduce their reliance on temporary accommodation through RRTPs, in the immediate term a wide range of temporary accommodation options should be considered, including community hosting and appropriate sharing options (where needs are matched well and only small numbers are sharing together).

We recommend a housing support needs assessment informs a process of matching people to accommodation and any relevant support, particularly so that people with high support needs are not placed in the most unsuitable conditions, which risks exacerbate the situations of all people housed in that accommodation.

There also needs to be a much stronger focus on preventing homelessness, ultimately through a new duty on local authorities and other public bodies to prevent homelessness. This should result in a significant reduction in the number of households requiring homelessness assistance, including temporary accommodation.

The Scottish Government should ensure that its categories of temporary accommodation reflect the Order so that reporting of breaches is as accurate as possible.

Crisis does not believe financial sanctions are appropriate, as this could ultimately result in a poorer service and fewer resources for homeless households. This was also the clear consensus in the roundtables we held with both local authorities and representatives of the third sector.

#### *11. Monitoring by Scottish Housing Regulator and possible enhanced powers*

The role of the Scottish Housing Regulator will be important. Local authorities told us that a critical Regulator report can be valuable in attracting the attention of more senior levels of the council. On the other hand, the self-assessment approach to regulation now being adopted does not lend itself well to monitoring poor practice and in-depth scrutiny of breaches, and the experience of the Regulator's long-term intervention in Glasgow City Council's ongoing failures has not bred confidence. The Regulator would need further resourcing and greater powers to assess implementation of the Order and effect swift action where local authorities repeatedly breach it, especially to do scrutiny or inspection work.

### **Section 3: Advisory temporary accommodation standards**

#### *1. Should the existing standards provide the basis for advisory standards?*

The existing standards provide a good basis for new advisory standards. Many local authorities have been working to these standards for some time. Alongside these, we welcome the opportunity to develop a more comprehensive and enforceable framework over time.

#### *2. Are the standards in the CIH / Shelter Scotland guidance still relevant and fit for purpose?*

As a framework for advisory standards, which are to be replaced by enforceable standards within the foreseeable future, the CIH / Shelter Scotland standards are still relevant and fit for purpose. Standards that were particularly highlighted by respondents to our lived experience consultation included cleanliness, affordability and the need for adequate support. We would also emphasise the importance of assessing and matching people's needs to ensure a safe and supportive environment.

#### *3. Are there additional standards that should be considered?*

The system and type of accommodation people access should be person-centred, meeting their needs as far as possible. This should include being able to personalise the environment, such as using the household's own furniture and consideration of whether people have pets. In addition, where people have support needs, a psychologically informed approach should be used, and staff trained accordingly.

We would welcome a strong statement in the Code of Guidance against the use of unsuitable temporary accommodation and the importance of placing people in accommodation which meets their needs and enables them to move forward in their homelessness journey, pending a new Order.

4. *Should the standards be included in the refreshed Code of Guidance or elsewhere?*

We agree it would be appropriate to include new standards for temporary accommodation in the refreshed Code of Guidance. They should also be made available for people needing to use temporary accommodation, so that they have a clear understanding of what they should expect.

5. *How should LAs be supported or encouraged to adopt the standards?*

We would expect to see consideration of how to ensure high standards of temporary accommodation as part of work on RRTPs. In the longer term, support and compliance measures to assist the implementation of the unsuitable accommodation order should be used to ensure the standards are adopted.

6. *Should reference be made to other legislative and regulatory mechanisms in the new set of accommodation standards?*

We would expect to see reference to existing law that applies to temporary accommodation to ensure that temporary accommodation meets all relevant requirements.

#### **Section 4: Enforceable temporary accommodation standards**

1. *Approach of developing a framework and legislating to fill gaps*

It seems reasonable to use the existing framework of standards for accommodation as a basis for enforceable standards in temporary accommodation. It should also join up with other relevant standards, including the physical standards in permanent accommodation, HMO licensing requirements, Care Inspectorate requirements etc. Standards around suitability and support, both for housing need and any other support issues, will be particularly important to develop.

2. *Current local authority processes and procedures to monitor standards*

3. *Sanctions for failure to meet the new standards*

As discussed in relation to the Unsuitable Accommodation Order, it will be important to have a clear and effective framework in place to ensure compliance. There should be a tiered approach to support and sanctions for when support has proved ineffective.

Crisis does not believe financial sanctions are appropriate, as this could ultimately result in a poorer service and fewer resources for homeless households. This was also the clear consensus in the roundtables we held with both local authorities and representatives of the third sector.

4. *Other approaches and options to implementation to ensure adherence to the standards*

Alternatives to financial penalties might include scrutiny and reporting from the Scottish Housing Regulator and Scottish Government, improvement support from the Scottish Housing Regulator or Scottish Government, improvement orders for the local authority and

improvement and closure orders for particular premises. Improvement support should address the whole housing and support system and not just the homelessness service, including scrutinising how RRTPs, LHSs and SHIPs and other strategic plans contribute to avoiding breaches now and in the future.

Local authorities should be looking at a wide range of permanent and temporary accommodation options to alleviate homelessness. Use of the private rented sector, mid-market rent, shared housing and empty homes should be maximised, along with social lets to homeless households. While all local authorities should be seeking to reduce their reliance on temporary accommodation through RRTPs, in the immediate term a wide range of temporary accommodation options should be considered, including community hosting and appropriate sharing options (where needs are matched well and only small numbers are sharing together).

We recommend a housing support needs assessment informs a process of matching people to accommodation and any relevant support, particularly so that people with high support needs are placed in the most appropriate conditions, which risks exacerbate the situations of all people housed in that accommodation.

*5. Should the SHR take on a role and use existing powers to monitor and assess performance, and would additional powers be needed?*

As above, the role of the Scottish Housing Regulator will be important. Local authorities told us that a critical SHR report can be valuable in attracting the attention of more senior levels of the council. On the other hand, the self-assessment approach to regulation now being adopted does not lend itself well to monitoring poor practice and in-depth scrutiny of breaches. The experience of Regulator long-term intervention in Glasgow City Council's ongoing failures has not bred confidence. The Regulator would need further resourcing and possibly greater powers in order to effect swift action where local authorities repeatedly breach the Order.

*6. What should a working group take into account in developing a new standards framework?*

A working group must have representation from people who have lived experience of homelessness, and specifically of different forms of temporary accommodation. Eight out of 21 people with lived experience of homelessness responding to this question highlighted this as the key factor to take into account.

*"The working group needs lived experience at the heart of it. What does it feel like walking into the temp accommodations when your life feels like it is not your own."*

Respondent to lived experience consultation question

The key principles for these standards must be that temporary accommodation should be used as little as possible as services transition to system focused on rapid rehousing into permanent housing, and where it has to be used that “temporary accommodation in 21st century Scotland is good quality, safe, warm and affordable. It should also be a means through which people who are homeless and waiting for a settled home, are able to access the advice, support and signposting they need in order to move away from the immediate crisis of homelessness.”<sup>3</sup> More detail on the principles identified by HARSAG are contained on p4 of their report and these should form the basis of the work on enforceable standards.

The First Minister’s Advisory Group on Human Rights Leadership<sup>4</sup> has recommended the creation of a new Act of the Scottish Parliament from 2021 which would enshrine a range of rights in law, including the right to adequate housing, the right to adequate food, the right to the enjoyment of the highest attainable standard of physical and mental health. It will be important for the working group to consider how these rights can be met in temporary accommodation.

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For more information, please contact Beth Reid, Senior Policy Officer, Crisis  
Tel: 0131 209 7726, Email: [beth.reid@crisis.org.uk](mailto:beth.reid@crisis.org.uk)

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<sup>3</sup> HARSAG (2018) Transforming the use of temporary accommodation in Scotland p14

<sup>4</sup> Miller, A (2018) Recommendations for a new human rights framework to improve people’s lives Report to the First Minister. First Minister’s Advisory Group on Human Rights Leadership

## Appendix

Letter written for Crisis Skylight Edinburgh client by Crisis housing coach to local council, 2 August 2019, exemplifying the experiences of someone in temporary accommodation which is unsuitable

*Crisis is supporting X who is living in Y Accommodation. She is really struggling with her mental health at the moment, especially anxiety and there are some small issues at Y Accommodation which are making this worse for her.*

*She finds spending too much time in the room quite difficult and she “comes and goes” several times per day. She had already mentioned to the council housing officer that one member of staff had been shouting at her for buzzing the door too often. She tells me that she now has panic/anxiety each time she approaches the door. I’m aware that some people have a code for the door – do you think that this could be arranged for X, please? It would really help with her mental health.*

*She also mentioned that one of the rules in the paperwork that she was given is that no personal belongings are allowed to be on display in her bedroom. She finds this quite punitive and de-humanising. She’s quite anxious that she has put a shawl over her desk, to make it more homely. Is she allowed personal belongings in her room, perhaps some pictures and other bits and pieces?*

*She mentioned to me that on one occasion she was feeling overwhelmed in her room and went to the hallway to look out of the window – she was told by a staff member to “get back to her room”. Again, this felt punitive and de-humanising.*

*One other rule she mentioned is that she must strip her bed every Wednesday, which she religiously does. However, each Wednesday evening she makes her bed again because nothing has happened to the bedding she removed.*

*X is aware that other people have been asked to leave when they have complained, and this would be hugely disruptive to her – Can I ask that you do not let the staff know that she has mentioned these issues?*

*She has been very upset the last few times I have met with her, and she paints a very bleak picture of her life in Y Accommodation – I am of course aware that there are two sides to every story, but wanted to bring this to your attention in case other residents are saying similar things.*

*I suppose that what would really help X would be having the code to the door and knowing that she can personalise her private space.*