



## **Crisis Submission to the Scottish Government's Consultation on *Housing to 2040 – A Vision for our Future Homes and Communities*. February 2020**

Crisis is the national charity for people experiencing homelessness. We are dedicated to ending homelessness by delivering life-changing services and campaigning for change.

We welcome the opportunity to comment on the Scottish Government's consultation on Housing to 2040. This statement, and the route-map that the Government intends to develop to deliver it, provide an opportunity to ensure that the commitment to ending homelessness is embedded in Scottish Government programmes in the medium to longer term.

The focus of the 2040 Vision rightly extends far beyond the challenge of ending homelessness, encompassing broader challenges associated with tackling the unequal distribution of housing assets, responding effectively to demographic change and addressing the role of housing in the climate crisis. While homelessness is also addressed, we are concerned that some essential components of the Government's plans to end homelessness have been lost in the top-level draft vision and principles.

In 2018 we 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 Crisis' Plan to End Homelessness have significant cross-over with the recommendations of the Scottish Government's Homelessness and Rough Sleeping Action Group (HARSAG) and the Ending Homelessness Together Action Plan. These recommendations have shaped our submission.

Homelessness remains one of the most pressing housing challenges we face, with far reaching and damaging consequences for society. Action to tackle homelessness has the potential to contribute to improvements in performance on key national indicators including satisfaction with housing and relative poverty after housing costs. But success in ending homelessness should also be a key indicator of the success of future housing policy in its own right. We would like to see further development of the Housing to 2040 Vision to ensure it adequately encompasses Scottish Government plans for ending homelessness.

Key points from our submission are as follows:

- The commitment to eradicate homelessness needs to be underpinned by a sustained strategic response to implement effective prevention. This is not just about getting the right homes in place in sustainable communities, but also ensuring that tailored support is in place to meet people's individual needs, and there is effective collaboration between statutory agencies underpinned by a "no wrong door" approach. The wording of the vision and principles could be strengthened to ensure that this is clear;

- The consultation document highlights the financial constraints that future governments will face in delivering the 2040 vision. We set out our evidence on the scale of future housing requirements that must be met if homelessness is to be ended in Scotland, and on the continuing need for investment in both social rented housing and homelessness interventions in the medium to long term. We also provide evidence of the cost benefits of this investment, and the case for prioritising spending to end homelessness. Investing to prevent homelessness delivers savings and benefits of £2.70 for every £1 spent, while social housing investment delivers more than double the value of upfront investment through improved economic output;
- We set out proposals for other interventions to improve affordability and access to housing, including introducing limits on the amount that private rents can be increased each year, and administrative measures to improve the quality of the evidence base on private rents. We also propose a review of the effectiveness of private rented access schemes, to help improve the viability of private renting for people moving on from homelessness.
- Finally, we make the case for action on homelessness to be expressly included in the National Performance Framework. The absence of homelessness indicators in the national indicator set is a concern. The development of the 2040 vision provides an opportunity to ensure that the objective of ending homelessness is fully embedded in future government programmes.

#### **Q1. Crisis comments on the draft vision and principles**

While we welcome the broad thrust of the draft vision and principles, we are concerned that some essential components of the Ending Homelessness Together Action Plan are lost in the top-level statement. Specifically, we would like to see the vision and principles set out in express terms how systems will have changed to embed effective homelessness prevention. Our recommended amendments are set out below:

- **The vision:**

The 2040 vision is of a housing system in which people can quickly find a home when they need one, for example when their circumstances change, and know where to get help to prevent them from losing their home. They will also be assisted to keep their home at difficult points in their lives.

While these statements are welcome and go some way towards mapping out the conditions in which homelessness will have been eradicated, we would like to see a direct reference to what happens when homelessness cannot be prevented. We would also like to see an express reference to the role of public services and key partner agencies in preventing homelessness, and to the commitments around “no wrong door” included in the Ending Homelessness Action Plan.

Suggested amendments are as follows:

- In the section “A well-functioning housing system”, under either “Finding the right home” or “Fairness”, the text should expressly refer to the support that will be provided to help those at risk of losing their home whose homelessness cannot be prevented. For example: *“If I risk losing my home and this cannot be prevented, I am supported to find a new home that meets my needs”*

- In the section “Homes that meet people’s need”:
  - “My rights” could include a clearer statement that people will receive the help they need to prevent homelessness, for example after “I know where to get the help I need to prevent me from losing my home” add the words *“and receive the support I need.”*
  - “My services” could include an additional sentence to make clear the importance of effective co-operation between public services to prevent homelessness. This might include a statement along the lines that *“public agencies and housing providers that I have contact with will work together effectively to support me if I am at risk of homelessness, and will enable me to find a settled home”*

- **The principles:**

We welcome the inclusion, under Principle 13, of the statement that “homelessness has been eradicated; people needing homes are found homes quickly.” Whilst welcome, the absence of further detail on how this will be realised is disappointing and fails to acknowledge the reality that eradicating homelessness will require sustained strategic action on an ongoing basis. The Scottish Government’s Ending Homelessness Together Action Plan acknowledges this by stating that, in practice, ending homelessness means ensuring that homelessness is only ever rare, brief and non-recurrent. The Action Plan sets out the measures that will achieve this over its five-year term. We would like to see the principles in the 2040 vision amended to ensure that the commitment to preventative action is embedded in policy for the longer term

A key recommendation of the Scottish Government’s Homelessness & Rough Sleeping Action Group was to “ensure legislation provides sufficient support for a shift to significantly greater levels of prevention.” Subsequently, the Prevention Legal Duties Review Group convened by Crisis on behalf of the Scottish Government is currently developing recommendations for introducing a comprehensive homelessness prevention duty on local authorities and public bodies. The group is due to report in Summer 2020, and while not wanting to pre-empt its recommendations, the 2040 principles should clearly embed this policy intent in broad terms.

So whilst the provision of affordable housing options for all that need them (as currently spelt out in the principles) is critical to achieving the eradication of homelessness, the principles need to go further to spell out that effective prevention activity is also required. This should encompass person-centred services with tailored support to help those who need it to access and retain settled housing. It will also require effective partnership working across the relevant statutory agencies to identify those at risk and ensure their individual needs are addressed. Principle 13 acknowledges this for service personnel, saying they must be provided with the right resettlement support, but does not establish this benchmark for all people at risk of homelessness.

We therefore recommend that this section of the text is expanded to make clear that people at risk of homelessness will be able to access effective homelessness prevention services and the right resettlement support. It should also clarify that this will mean delivering person centred responses, tailored support services for those who need them and national action to ensure effective interagency collaboration and a “no wrong door” approach.

## **Q2. Crisis comments on drivers of change and constraints**

The 'Housing to 2040' consultation document sets out the range of factors that will impact on the route map to delivering the 2040 vision - encompassing demographic change, climate change and political and economic factors – whilst also highlighting expected financial constraints. The challenges are significant with projections of an ageing population, smaller relative workforce, more single households competing for an undersupply of one-bedroom homes, and the expectation that current levels of housing investment in new supply will be hard to sustain. The impact of the UK Government's welfare reform programme will also continue to undermine Scotland's ability to tackle homelessness, and Crisis continues to call for LHA rates to be restored to the 30<sup>th</sup> percentile of local rents, a measure that would help prevent homelessness and lift more people out of poverty.<sup>1</sup>

We set out our proposals for interventions that would help deliver the Scottish Government's commitments on homelessness in response to Q3 & Q4 below. Central to our proposals is the imperative to sustain investment in new homes for social rent over the period to 2040 in order to maintain the commitment to eradicate homelessness, and in the process generating significant savings and benefits for the public purse. Equally important is the need to invest in effective homelessness interventions, including both prevention and rapid rehousing. We address each of these areas of investment below.

- **Investing in the supply of homes for social rent**

The Scottish Government's current £3 billion funding commitment to deliver at least 35,000 homes for rent over 5 years has played an important role in constraining the scale of homelessness in Scotland by comparison with England.<sup>2</sup> The High Level Action Plan acknowledges the importance of social housing supply to homelessness prevention, and commits Scottish Government to ensuring that the evidence on housing supply needs emerging from Rapid Rehousing Transition Plans will "help steer future supply policy".<sup>3</sup>

Crisis commissioned Heriot Watt University to deliver an analysis of the scale of provision required to reduce homelessness in Scotland over the next 15 years.<sup>4</sup> This study specifically examined the impact of different housebuilding scenarios on a range of factors including poverty, homelessness, affordability and housing demand. The study recommended that to achieve optimal outcomes, the output of new social rent homes should be sustained at 5,500 a year in the period to 2031. The Scottish Government's 2016-2021 annual target of 7,000 homes a year exceeds this annual requirement rate in the period to 2021, providing a welcome level of investment to boost social housing supply in the short term. The Heriot Watt study also identified an optimal overall affordable housing target of 10,000 homes a year. While this is lower than the current programme of 12,000, it indicates a strong case for continued investment in shared ownership and mid-market rent as well as homes at social rent levels.

It will be critical also to ensure that future investment is effectively targeted. The independent review of national spending on affordable housing commissioned by Shelter Scotland in 2018 highlighted concerns that an insufficient share of current funding may be reaching local authorities assessed as

---

<sup>1</sup> Basran, J. (2019) *Cover the Cost. Restoring Local Housing Allowance rate to prevent homelessness*

<sup>2</sup> Downie, M., Gousy, H., Basran, J., Jacob, R., Rowe, S., Hancock, C., Albanese, F., Pritchard, R., Nightingale, K. and Davies, T. (2018) *Everybody In: How to end homelessness in Great Britain*.

<sup>3</sup> Scottish Government (2018) *Ending Homelessness Together: High Level Action Plan*

<sup>4</sup> Bramley, G. (2018) *Housing supply requirements across Great Britain for low income households and homeless people*.

having the greatest housing requirement.<sup>5</sup> As new evidence emerges from the forthcoming Shelter Scotland/SFHA/CIH Scotland housing needs analysis and Rapid Rehousing Transition Plans, it is essential that this is used to target future investment. Our recent review of these plans<sup>6</sup> highlights the importance not only of targeting new supply in localities with greatest need, but also towards homes which match the size requirements of households who are homeless. This means expanding provision of one-bedroomed homes in many parts of Scotland.

Whilst acknowledging the wider pressures on public finances, allowing the supply of new social rent and intermediate homes to fall below the levels recommended by the Heriot Watt analysis risks jeopardising the delivery of the High-Level Action Plan, and thus undermining wider local and national activity to end homelessness. Failure to sustain action on homelessness would bring additional costs for the public purse; analysis for Crisis has shown that each case of single homelessness prevented saves the public purse in the region of £9,000 a year.<sup>7</sup>

Sustained investment in affordable housing has wider economic benefits which should be considered alongside the homelessness impacts as part of the decision-making process for future housing investment. Studies in Scotland and the wider UK have demonstrated the strong economic case for social housing investment.<sup>8</sup> The Shelter Scotland cost benefit analysis identifies the following benefits for Scotland:

- Higher disposable incomes for low income households. Reducing the supply of social renting would mean more people living in private rented housing are susceptible to higher housing costs, with a negative impact on household budgets
- Boosting the economy. Every £100 million invested in affordable housing supply generates £210 million of economic output in the wider economy and sustains 12,000 jobs
- Contributing to prevention: improved housing conditions reduce the effects of overcrowding, dampness, disrepair and fuel poverty help tackle inequality and poor health, while also reducing the costs of homelessness.

There is therefore a strong moral and financial imperative to prioritise continued investment in affordable housing at least for the decade to 2031. We urge the Scottish Government to consider the evidence base outlined above as it develops the route map for Housing to 2040 and maintain investment to deliver an average of at least 5,500 homes a year at social rents as part of an affordable homes programme of 10,000 homes a year. This investment should be targeted effectively to meet identified needs, informed by the evidence base from Rapid Rehousing Transition Plans.

- **Investing in effective homelessness prevention**

There is an equally important imperative to invest in effective homelessness prevention services. Homelessness has a damaging effect on the lives of those who experience it, as well as wider costs to society. Recent analysis of the links between health outcomes and homelessness in Scotland found that an estimated 8% of the Scottish population had experienced homelessness at some point in their

---

<sup>5</sup> Young, G. and Donohoe, T. (2018) *Review of Strategic Investment Plans for Affordable Housing*. d

<sup>6</sup> [https://www.crisis.org.uk//media/241640/crisis\\_rapid-rehousing-report\\_web\\_spreads\\_v2.pdf](https://www.crisis.org.uk//media/241640/crisis_rapid-rehousing-report_web_spreads_v2.pdf)

<sup>7</sup> Pleace, N. and Culhane, D.P (2016) *Better the Cure? Testing the case for Enhancing Prevention of Single Homelessness in England*

<sup>8</sup> Shelter Scotland (2015) *The economic impact of investment in affordable housing*.

Chaloner, J., Dreisin, A. and Pragnell, M. (2015) *Building New Social Rent Homes. An Economic Appraisal* SHOUT/National Federation of ALMOs;

Savills (2017) *Spotlight 2017: Investing to solve the housing crisis*.

lives.<sup>9</sup> The same study found that those with experience of homelessness had significantly higher rates of attendance at A&E, acute hospital admission and admission to mental health specialist services than the general population. Investment in homelessness prevention has the ability to deliver savings in health spending, as well as savings in sectors such as criminal justice.

The cost in Scotland of implementing the solutions set out in the Crisis' Plan – including Housing First, Critical Time Interventions, and the provision of effective resettlement support - would be £615 million over the first ten years of implementation, according to research conducted by PwC.<sup>10</sup> 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. It offers a ratio of £2.70 benefits and savings for every £1 spent.

Ending homelessness is morally the right thing to do, particularly in a society that wants to prioritise fairness and social justice. But it also brings significant additional benefits and savings. Investing in homelessness prevention will contribute to the achievement of the Scottish Government's wider objectives on tackling poverty and enabling people to realise their full potential and contribute to society.

As noted above the Prevention Review Group convened by Crisis on behalf of the Scottish Government is currently developing recommendations for introducing a comprehensive homelessness prevention duty on local authorities and public bodies. This has the potential to drive changes in practice that would ensure all relevant agencies play their role in homelessness prevention. The group is due to report in Summer 2020. We want to see Scottish Government committing to ensure that the group's recommendations translate into legal responsibilities on appropriate public bodies to prevent homelessness, and that this intent is embedded in the Housing 2040 vision.

### **Q3. Proposals that would increase the affordability of housing in the future**

In our report *Everybody In: How to end homelessness in Great Britain* we advocate a mixed economy approach to tackling homelessness in Scotland, maximising investment in social housing, but also acknowledging the role that the private rented sector can play in providing settled housing for people moving on from homelessness.

Our primary recommendation in relation to housing affordability is that Scottish Government sustains investment in the supply of social rented housing, as outlined in response to Q2. This will provide an essential foundation for the Ending Homelessness Together Action Plan.

In addition, we recommend the following to improve affordability for low income households:

- **Develop a robust definition of affordability that addresses the needs of people on the lowest incomes, including people in receipt of Housing Benefit**

Scottish planning policy currently defines affordable housing as 'homes affordable to people on modest incomes'<sup>11</sup>. In terms of prioritising settled homes for all, this is not an adequate definition, as

---

<sup>9</sup> Waugh, A et al (2018) *Health and Homelessness in Scotland*

<sup>10</sup> PwC (2018) *Assessing the costs and benefits of Crisis' plan to end homelessness*

<sup>11</sup> Scottish Government (2014) *Scottish Planning Policy*. Scotland: Scottish Government. (paragraph 126)

it does not address the affordability challenges faced by people on very low incomes whether in the social or private rented sector. The development of a more robust definition should go hand in hand with a realistic and informed debate about the range of housing options that are needed in local areas. It would also ensure that the future Affordable Housing Supply Programme can meet the needs of those people in Scotland at greatest risk of homelessness through poverty and low income and will in turn contribute to performance against the national indicator on tackling relative poverty after housing costs. Recent analysis by the Joseph Rowntree Foundation highlighted that the higher proportion of people in poverty living in social housing in Scotland who pay lower rents partly explains the lower Scottish poverty rate compared with England and Wales.<sup>12</sup>

Analysis by Crisis and the Chartered Institute of Housing shows that in a number of areas of Scotland, many low-income households will struggle to afford privately rented housing and live at an adequate standard of living.<sup>13</sup> Lothian, Great Glasgow and the Perth and Kinross regions are particularly unaffordable for different household types.

Our PRS access project in Edinburgh illustrates the scale of the shortage of affordable homes in the City's high-pressure market. For the past 6 months, our PRS access project in Edinburgh, Help to Rent, has taken a weekly record of all privately rented properties in the city advertised online below, at and slightly above the Lothian LHA rate. This allows us to assist interested and suitable homeless applicants referred to us by the Council, as well as gather a better understanding of the total available private market to those dependent on benefits. While there are typically well over 1000 privately rented properties available to let each week, on average only around 25 of these are self-contained homes available at or below LHA. There is a particular shortage of one bedroomed homes.

Our PRS access service also maps available mid-market rent housing, a type of affordable tenure which is prevalent in Edinburgh. We recently completed an exercise whereby Mid-Market rents and access criteria were compared with the incomes of the first 50 households referred to us by the Council. 55% of those homeless households were working, with just under 30% in full-time employment; all were on "modest" incomes<sup>14</sup>. However just 16% met criteria for the two most generous mid-market rent providers; with no households meeting criteria for the least generous mid-market rent landlords. The City of Edinburgh Council's Rapid Rehousing Transition Plan (RRTP)<sup>15</sup> shows that 60% of the affordable house-building in the city to 2029 is projected to be mid-market rather than social tenures. Whilst mid-market providers have committed to a preference in allocations to working homeless households, in reality the rent levels, access criteria and size of mid-market homes mean that this sector is rarely a realistic option for those on low earnings.

Consideration should be given to linking the definition of affordability to the availability of support with rent through the benefit system, addressing the growing gap between rents and what Housing Benefit will cover. A revised definition should also ensure that social housing remains affordable to those on low earnings, while mid-market housing is affordable to those on modest incomes. The aim should be to ensure that there is a comprehensive safety net which enables all people in Scotland to afford housing.

---

<sup>12</sup> Joseph Rowntree Foundation (2020) UK Poverty 2019/20

<sup>13</sup> Basran, J. (2019) *Cover the Cost. Restoring Local Housing Allowance rate to prevent homelessness*

<sup>14</sup> <https://www.gov.scot/publications/rent-affordability-affordable-housing-sector-literature-review/pages/6/>

<sup>15</sup> [https://www.housingnet.co.uk/pdf/Item\\_8.3\\_Rapid\\_Rehousing\\_Transition\\_Plan\\_\(1\)](https://www.housingnet.co.uk/pdf/Item_8.3_Rapid_Rehousing_Transition_Plan_(1))

- **Introduce limits on how much private sector rents can be increased each year**

The Private Housing (Tenancies) (Scotland) Act (2016) aims to protect private renters from unpredictable rent increases, stipulating that rents cannot be increased more than once a year, and that three months' notice of a rent increase is required. Tenants can also challenge rent increases through the Rent Officer if they think they are too high. Additional provisions for rent pressure zones created the option for local authorities to apply to limit rent increases to CPI plus one percent in specific circumstances in high pressure housing markets.

However, recent research has found that these provisions have had limited impact in areas of highest housing pressure.<sup>16</sup> Rather than having their rent limited for the Rent Officer service, some tenants have had their rent increased above the level proposed by the landlord when they appeal against rent increase proposals. Where market-led rent increases are unaffordable, tenants are left at risk of homelessness. While Rent Pressure Zone proposals should have provided safeguards for those at risk of excessive rent increases, they have been found to be unworkable in practice, mainly because of the paucity of data enabling local authorities to demonstrate (as required) that rents are rising excessively in a given area, causing undue hardship to tenants and having a detrimental effect on the authority's broader housing services.<sup>17</sup>

In the light of this evidence we would like to see Scottish Government considering alternative provisions to provide tenants will greater rental stability. Setting a limit on how much rents can be increased each year would have the potential to provide tenants with greater certainty, protecting them from unpredictable and sometimes significant rent increases. In our plan to end homelessness, Crisis called for the inclusion of a clause in all tenancies to limit annual rent increases to the maximum of a pre-determined inflationary measure. We urge the Scottish Government to consider the introduction of this measure.

We also recommend that Rent Officers and First-tier tribunals are no longer permitted to increase rents above the level proposed by landlords and are only able to lower or maintain a rent level on appeal.

- **Require landlords to submit rents data as part of the Scottish Landlord Register**

As noted above, the paucity of data on rent levels has undermined the effectiveness of Rent Pressure Zone provisions. The lack of reliable rents data also weakens the accuracy of the evidence base used to set Local Housing Allowance rates, and particularly the Shared Accommodation Rate that applies to most single adults aged under 35. Problems with the methodology for calculating these rates are documented in our plan to end homelessness.<sup>18</sup> If all private sector landlords were required to submit data on rent levels annually, these problems could be addressed. The volume of data available to set Local Housing Allowance rates would increase, improving their accuracy. A more robust dataset on private rents would also provide an essential resource for local authorities to build a case for

---

<sup>16</sup> Robertson, D. & Young, G. (2018) *An evaluation of Rent Regulation Measures within Scotland's Private Rent Sector. A report to Shelter Scotland.*

<sup>17</sup> Robertson, D. & Young, G. (2018) *An evaluation of Rent Regulation Measures within Scotland's Private Rent Sector. A report to Shelter Scotland. r*

<sup>18</sup> Downie, M., Gousy, H., Basran, J., Jacob, R., Rowe, S., Hancock, C., Albanese, F., Pritchard, R., Nightingale, K. and Davies, T. (2018) *Everybody In: How to end homelessness in Great Britain.*



designating Rent Pressure Zones (although these provisions would not be needed if Scottish Government were to act to limit rent increases to an inflationary measure for all tenancies).

Crisis therefore recommends that landlords are required to submit rents data at the start of a tenancy and then annually as a requirement of participation in the Scottish Landlord Register.

#### **Q4. Proposals that would increase the accessibility and/or functionality of existing and new housing**

- **The case for a national help to rent scheme for Scotland, with national funding for rent deposit guarantees**

Private rented sector help to rent or access schemes, and rent deposit guarantees, play a critical role in making the private rented sector a viable option for people moving on from homelessness. They help people access and sustain tenancies, while providing landlords with reassurance that tenants will be supported. Support includes pre-tenancy and on-going tenancy support, written guarantees for landlords in place of cash deposits and income maximisation including help with benefits, budgeting, saving and managing debt. Projects build good relationships between landlords and their tenants, encouraging longer tenancies, and helping to prevent future homelessness. From 2010-14, with funding from the Department for Communities and Local Government, Crisis ran the Private Rented Sector Access Programme, which created over 8,000 tenancies with 90% lasting over six months. Evaluation showed that in three months, 92 projects saved more than £13 million in non-housing costs to the public purse.<sup>19</sup> Many projects also help tenants to gain employment, along with the support they receive to help make Universal Credit more sustainable.

Since March 2019, Crisis has been commissioned by Edinburgh City Council to deliver a Help to Rent service in the city. Despite the challenges highlighted above in relation to the Edinburgh property market, the service has already demonstrated that it is possible to build bridges between the Council's homelessness service and the private rented sector which prevent and end homelessness.

There has been high demand for the service from applicants, while the response from letting agencies and landlords to our dedicated landlord liaison officer has been positive. We have been able to assist over 40 households into the small portion of the sector which is affordable to them, with landlords and agencies now coming to us with voids to fill before they are advertised. The take-up of the service has been so positive that its funding was doubled within the first 6 months. This demonstrates that it is possible for PRS access schemes to make inroads into even the most challenging property markets, where a high quality, bespoke service is funded.

Research for Crisis found that among landlords with experience of letting to homeless people, 59% said they would only consider letting to homeless households if backed by such interventions.<sup>20</sup> This was echoed by research carried out by Crisis for Highland Council in 2019 in the pressured Inner Moray First market, where 56% of respondent landlords gave the same response. This highlights the pivotal role of access schemes in providing private landlords with the reassurance they need to accept people moving on from homelessness as tenants. But in many areas, there is an absence of adequate provision. A survey by Crisis of local authority and commissioned PRS access services in Scotland in 2018<sup>21</sup> identified that just under a quarter of authorities had no service at all in their area, whilst over half with a service had no dedicated staff member to develop relationships with landlords and lettings agencies. Those few authorities which did have well-staffed services showed they were able to achieve

---

<sup>19</sup> Gousy, Hannah (2016) *Home: No less will do*.

<sup>20</sup> Reeve, K et al (2016) *Home: No Less will do – Homeless people's access to the Private Rented Sector*.

<sup>21</sup> <https://www.crisis.org.uk/media/240362/prs-access-schemes-the-landscape-in-scotland.pdf>

positive move-on, sustainment and landlord engagement. But the availability of these options remains dependent on where a household finds themselves in Scotland.

We recommend that the Scottish Government reviews provision of private rented access schemes across Scotland and considers the case for creating a national help to rent scheme for Scotland, with national funding for rent deposit guarantee schemes.<sup>22</sup>

---

<sup>22</sup> Downie, M., Gousy, H., Basran, J., Jacob, R., Rowe, S., Hancock, C., Albanese, F., Pritchard, R., Nightingale, K. and Davies, T. (2018) *Everybody In: How to end homelessness in Great Britain*.

**Q8. Any other comments.**

To help future proof the Government's commitment to ending homelessness and ensure that homelessness prevention and rapid rehousing initiatives continue to receive the funding they require, action on homelessness should be expressly included in the National Performance Framework.

In 2018 the Scottish Government and COSLA agreed a new National Performance Framework, with five objectives and supporting indicators to achieve these, but homelessness no longer specifically features in the national indicator set. While the Ending Homelessness Together Action Plan references the National Performance Framework, the absence of homelessness indicators in the national indicator set is a concern. To support work on the route map to deliver the Housing 2040 vision, Scottish Government should consult on options for top level indicators that demonstrate national progress in preventing homelessness and delivering a rapid rehousing response. Success in ending homelessness should be a key indicator of the success of future housing policy in Scotland.

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)