



Consultation on:

Improving Temporary Accommodation Standards

We are delighted to make the following submission to the Scottish Government's consultation on Improving Temporary Accommodation Standards.

For more information on this response, please contact:

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1. INTRODUCTION

- 1.1 To inform this response we directly consulted with the broadest range of people planning, delivering and using homelessness services across Scotland. This was to understand views on and aspirations for temporary accommodation in Scotland from a number of different perspectives.
- 1.2 We facilitated a series of workshops and interviews which involved:
- 35 people representing public and third sector organisations covering local authority areas from East Ayrshire to Edinburgh; *and*
 - 38 people with direct experience of emergency and temporary accommodation across 7 local authorities covering urban and rural areas. Our warmest thanks to everyone for taking part, some more information about them is provided at the appendix.
- 1.3 In the lived experience consultation we used a series of ‘sliding scales’ to better understand how people rated their experiences of different forms of temporary accommodation. The information presented below represents the aggregate ratings from the 38 individual participants.

2. PROPOSALS: UNSUITABLE ACCOMMODATION ORDER

Extend the 7 day restriction on time spent in unsuitable accommodation to all homeless households

- 2.1 On the whole there was significant support for the proposed extension of the terms of the Unsuitable Accommodation Order to all people experiencing homelessness. The support was shared across the professional and lived experience contributions, all seeing it as an extension of fairness and moving away from a two-tier approach to quality.
- 2.2 For most of the people with lived experience taking part, the current Unsuitable Accommodation Order did not apply to their circumstances. As a result, it was common for them to be placed in accommodation that they considered to be unsuitable.
- 2.3 Based on these conversations our position is to **fully support** the proposal to extend the Unsuitable Accommodation Order to all homeless households in Scotland, increasing fairness in our system of temporary accommodation.
- 2.4 *A breakdown of our 1:1 discussions with people living in temporary accommodation as follows:*

Q: In your experience how common is it to stay in unsuitable accommodation?



- 2.5 People described their experience of temporary accommodation as feeling like “a punishment for being homeless” or “like being in prison.”
- 2.6 Curfews and no-visitors policies were common in congregate accommodation such as hostels and some B&B’s. In people’s experiences these rules were unrealistic and ultimately contributed to the revolving door of homelessness.
- 2.7 The most common type of accommodation described as unsuitable was **B&B accommodation**, which 18 participants had experience of staying in:

Q: In your experience how common is it that B&B accommodation is unsuitable?



- 2.8 One participant summed up the experience of many when it came to B&B accommodation:

“In B&B I only ever got a place for a couple of days, having to think ahead all the time is exhausting, and so is moving every couple of days. I couldn’t settle”
- 2.9 **Hostels** were the type of accommodation most commonly used by participants, with 26 people having experience of staying in them. While less common than B&B to be described as unsuitable, it was still felt to be unsuitable most of the time:

Q: In your experience how common is it that hostel accommodation is unsuitable?



2.10 A range of responses of people's experiences of **hostels** included:

"I was getting put into hostels where I was surrounded by [people with addictions], which wasn't good for me ... it does have a negative impact on you."

"I came here with a homeless problem, now I'm leaving with loads of other problems."

"It was in a hostel when I was 16 that I first tried heroin, everyone else was on it and the staff didn't seem too bothered."

"Being here has made my mental health plummet and my drug use has gone through the roof."

"I've been offered free drugs 5 times in the last 4 days."

2.11 19 participants had experience of staying in **Temporary Furnished Flats** and they were much less likely to be described as unsuitable:

Q: How common is it that Temporary Furnished Flats are unsuitable in your experience?



2.12 While a more positive experience for most people, transitions from one TFF to another were problematic. As one participant described:

"Moving from one TFF to another caused me to relapse. It was an unfamiliar area, I had no support network. Moving impacted on my children, they had to move schools and are isolated."

"They've made new friends with a bad crowd and are getting into trouble at school which is out of character. I'm struggling financially, there's a stigma around the furnishings in a TFF."

Timetable for Implementation

- 2.13 Ensuring the optimal timing for implementing changes is important to us, and to everyone we consulted with. For local authorities and service providers there was a general consensus that the implementation plan should fit with the timescale for Rapid Rehousing Transition plans, with the planning framework providing a central point of focus and accountability.
- 2.14 To that end, extending the restriction to all homeless people from an agreed date (option A) is the best way forward, taking account of the range of local circumstances that would make a consistent national approach more difficult to achieve.

3. PROPOSALS: TEMPORARY ACCOMMODATION STANDARDS

Phase 1: Advisory Standards

- 3.1 The CIH Scotland/Shelter Scotland standards still form a good basis from which to build and with the main areas covered remaining broadly relevant. A full review as part of the process of moving towards legally enforceable standards in the future is a positive way forward.
- 3.2 When considering the proposed areas to be included within national standards, people with lived experience felt that, on balance the standards were fair and would broadly work in favour of, and be of benefit to, homeless households:

Q: Do you think these proposed areas for the standard are fair? Where on the scale?



- 3.3 Cost is of particular importance to people with lived experience of homelessness; temporary accommodation costs are too high and that they rarely see or experience value for money.

3.4 Additionally, high costs means people have to put their lives on hold as they are forced to make a choice between their temporary accommodation and employment, learning etc. While this has been a long-standing problem, the proposed standards were seen as an opportunity to resolve this key issue that has trapped people in homelessness.

Phase 2: Legally Enforceable Standards

3.5 Having a set of legally enforceable standards was particularly important for people with lived experience of homelessness. As one participant described:

“Having a set of standards would give me power, as I feel like everyone else has it except me”

Timetable for Implementation

3.6 As with discussions around the timescale for the extension of the Unsuitable Accommodation Order, there was a consensus that timescales for legally enforceable standards should be in line with Rapid Rehousing Transition Plans.

3.7 People with lived experience broadly favoured a timescale for change that was more likely to be effective in achieving positive change. They could describe many of examples of promises of change that never materialised and following through on commitments is particularly important.

Q: These changes could take a while to become real. Weighing up the benefits and risks, what feels best for you?



Support to Meet Standards

- 3.8 All participants recognised that local authorities and partners would require support to ensure they deliver temporary accommodation at higher standards. And while a role for the Scottish Housing Regulator was seen as important, a strong model of peer review and support across local authorities was more supported as a positive step forward.
- 3.9 Frustration at standards not being met was felt by everyone, with considerations of a sanctions approach an important part of discussions. On balance, a sanctions approach was only supported if it could be delivered in a way that didn't end up having a detrimental effect on a local authority's ability to deliver positive change.

APPENDIX: LIVED EXPERIENCE PARTICIPANTS

38 people living in temporary accommodation participated in a one-to-one interview about their experiences and their thoughts on the Scottish Government proposals for improvement:

- (i) 28 were men and 9 were women;
- (ii) Most were aged between 25-54, with full age range of 19-75;
- (iii) 25 people reported having a disability;
- (iv) The majority of people were White Scottish with smaller numbers describing themselves as White British, EEA migrants, or travellers.

People participating had experience of a range of different types of emergency and temporary accommodation:

- (i) 26 have stayed in Hostels;
- (ii) 19 have stayed in Temporary Furnished Flats;
- (iii) 19 have stayed in Supported Accommodation
- (iv) 18 have stayed in B&B's;
- (v) 14 have stayed in Emergency Accommodation (other than B&B's); and
- (vi) 5 have stayed in Night Shelters.

People participating had spent varying amounts of time staying in temporary accommodation:

- (I) On average people had spent a total of three years in TA;
- (II) The longest report was a total of 15 years; and
- (III) The shortest was 3 days from someone experiencing homelessness for the first time.

21 participants reported that they had experience of not receiving an offer of emergency or temporary accommodation when approaching the local authority for assistance. Of the occasions, the most common alternatives people went on to:

- (i) Sleep rough;
- (ii) Sofa surf; or
- (iii) Return to unsafe circumstances.

38 participants were spread across 8 local authority areas:

Glasgow City	Inverclyde
City of Edinburgh	Dundee City
Perth & Kinross	Argyll & Bute
North Ayrshire	West Dunbartonshire