

## RRTPs and HARSAG 2020

What now? A short guide for local authorities

## Thanks to expert focus group and authors

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### Introduction

### About this guide

This guide is intended to assist local authority leaders to transfer policy and practice recommendations from the Homelessness and Rough Sleeping Action Group (HARSAG) into local Rapid Rehousing Transition Plans (RRTPs) and factored into local delivery. It aims to do this by:

- streamlining themes and priorities
- clarifying the implications for RRTPs
- highlighting roles and responsibilities of partners

"Local Government is committed to working with partners to end homelessness, and this short guide is intended to support the transfer of the national recommendations and policy into local delivery. We know that although we have all experienced the pandemic, its effects and impacts have not been the same across the country, however significant challenges exist for all. I hope this guide, which has been developed by Crisis and Homeless Network Scotland with support from local authority officers and Scottish Government, provides useful assistance in our shared ambition of ending homelessness in Scotland."

> **Elena Whitham** COSLA Community Wellbeing Spokesperson

### About HARSAG

The Homelessness and Rough Sleeping Action Group (HARSAG) is a Minister-appointed expert group on housing and homelessness which in 2018 made 70 recommendations including the cornerstone Rapid Rehousing policy objective. Local authorities along with the Association of Local Authority Chief Housing Officers (ALACHO) are represented on the group.

HARSAG was reconvened in June 2020 in response to the coronavirus crisis and, consulting widely, the group published over 100 recommendations for local authorities, Scottish and UK Governments and other key partners including housing associations, health and the third sector.

The work of the group reflected the focus and pace already set by national and local government; that the nature of the global pandemic meant a rapid response to homelessness and rough sleeping was quickly prioritised. The Rapid Rehousing framework, just one-year old at the start of the pandemic, has since been described by a number of local authorities as the right framework for recovery.

### About the recommendations

The 104 recommendations take an immediate and longer-term view and their purpose is to:

- Lockdown policy and practice achievements during the pandemic, especially to prevent a return to previous levels of rough sleeping relevant to a small number of local authority areas.
- Protect and build on all that was achieved by all local authorities in the year before the pandemic, the first year of the transition towards a rapid rehousing approach.
- Strengthen recommendations on prevention, housing supply, Housing First, competence on equalities and preventing destitution among people with no recourse to public funds.

### **Everyone's business**

HARSAG acknowledged responsibilities for addressing and preventing homelessness do not sit solely with local authority homelessness teams. The major transition being made in Scotland's response to homelessness needs achieved with Scottish Government leadership and the help of Health and Social Care Partnerships, Registered Social Landlords, wider public bodies and the third and independent sectors.

The pandemic also highlighted the core relationship between health and home, demonstrating that in order to keep people safe we must work collaboratively across sectors but also showing that it's possible to do so - and quickly. Though this document is intended for local authorities, each of the four themes has outlined the key responsibilities and roles of partners.



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### Themes

The general picture across Scotland since the start of the pandemic is that rough sleeping has been largely absent, homelessness applications dropped, temporary accommodation placements risen significantly while social letting stalled. A spike in homelessness also has the potential to lag behind lockdown as the full health, social and economic impact of the COVID-19 pandemic emerges.

While each part of this general picture is not true in every area<sup>1</sup>, most local authorities are facing an unprecedented challenge now and in the aftermath of the COVID-19 pandemic. The pandemic has forced a record number of households into temporary accommodation, ultimately reversing the direction of RRTPs, but bringing a broader focus on the links between home and good health.

The HARSAG recommendations to mitigate against the worst impacts of the pandemic can be categorised into 4 themes that are relevant to all local authorities:

### 1. Prioritise Prevention

where homelessness is predictable, it is preventable

Recommendations to prevent homelessness, acknowledging that those most at risk may have changed due to the personal, social and economic impacts of COVID-19.

### 2. Settled Housing Options

home is the best base to build and live our lives

Recommendations to mitigate against a post-COVID spike in homelessness by broadening the supply and range and quickening access to settled housing options locally.

### 3. Equalities Competence

risk and impact of homelessness is not distributed equally

Recommendations to increase inequalities sensitive policy and practice because some groups are more impacted by, over-represented in, or excluded from the homelessness system.

### 4. Responsive Systems

an enabling homelessness system with 'no wrong door'

Recommendations on local homelessness systems and considering the extent to which COVID-19 has impacted locally, including temporary accommodation, services and support.

<sup>1.</sup> Statistics from <u>Scottish Housing Regulator</u>, compared with <u>Scottish Government annual</u> <u>homelessness statistics</u>, show Scotland as a whole registered 83% of 2019's equivalent figure for homelessness applications, ranging widely between 41%-120%, with only four authorities above 100%. 164% of 2019's level for temporary accommodation placements were made in the same period this year, showing an even wider range (304%-60%), with nine authorities below 100%. Households in temporary accommodation at end June 2020 was at 125% of 2019's figure, ranging from 94%-164%, with five authorities below 100%.

Some are new objectives and others invite sharper focus on scale or approach, highlighted as follows:



Recommendations in a nutshell, including where a revision may be needed of RRTP baseline data, insights and assumptions.



Objectives already underway locally, these recommendations have stronger emphasis on increasing the pace and/or broadening the scale needed.



Parts of the RRTP which may need more attention to fully factor in HARSAG 2020 recommendations, including equalities considerations.

ADD NEW

Additional objectives which may need included in RRTPs based on new legislation or new recommendations from HARSAG 2020.



This section highlights the roles and actions of key partners that can support local authorities.

### **Baselines**

Does your RRTP baseline data need re-evaluated as a result of the COVID-19 pandemic? Adjustments may be necessary in relation to:

#### **Market analysis**

whether local housing market has new or lost potential for affordable options. Has the LHA increase opened up properties in specific areas or of certain types or sizes? Is student or holiday let accommodation empty? Are private landlords reducing rents or seeking to sell?

#### Homelessness data

re-evaluate future homelessness demand using in-house and other data to assess who is most at risk. Use this to inform and target prevention work. In some areas, re-assessment of housing needs of current caseload may also be needed.

#### **Temporary accommodation**

re-set temporary accommodation baseline if temporary units increased in your area during the pandemic. Highlight the change in type of units and assess number of units which breach the Unsuitable Accommodation Order.

### Support needs baseline

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re-evaluate nature and distribution of support needs in the homelessness caseload (i.e. specialist, complex, medium, low/no categories in RRTP toolkit, as well as nature of support needed for people to move onto settled housing). This may look different to pre-COVID.

# Themes

# **1**| **Prioritise Prevention**

Where homelessness is predictable, it is preventable



Recommendations to prevent homelessness, highlighting that who is most at risk may have changed due to the personal, social and economic impacts of COVID-19. In a nutshell, HARSAG recommendations invite local authorities to:

- use evidence to **re-evaluate homelessness risk** locally and to guide prevention actions.
- increase the **pace and scale** of prevention activity.
- move towards an early intervention approach for groups most at risk, targeted up to six months prior to homelessness.
- focus on people renting, working towards a position of 'no evictions into homelessness' from social or private rented sector.

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To enable more effective prevention, useful tools local authorities should have in place include:

- processes to **obtain** and **analyse evidence** on which groups are at heightened risk of homelessness locally, making use of in-house data, data from RSLs, the third sector and other public bodies (ensuring the data-sharing agreements are in place), and national trends. This includes collecting information on the number of households at risk of eviction due to arrears or relationship breakdowns.
- **local early warning systems** which detect homelessness risk in key areas, such as arrears in rented housing, young people in at risk groups or households experiencing relationship breakdowns, and facilitate early action to prevent it or deliver a more managed pathway out of the situation.
- a strategy to raise and target **awareness of the financial help available** to those in housing difficulty from Discretionary Housing Payments (DHPs) and Scottish Welfare Fund (SWF).
- **protocols with public bodies** to ensure **people exiting institutions** have housing to go to and a plan in place, focused on idea of asking about then acting on housing situation.



- target, strengthen and test new approaches to **prevent homelessness of tenants** from both social and private sectors who are at risk due to arrears.
- ensure you have a Private Rented Sector (PRS) access service in place, and that this is accessible to households as a
  means of preventing, as well as alleviating, homelessness. Consider putting positive relationships with private landlords
  and letting agencies at the centre of your approach to prevention and access work with the PRS.
- step up access to **mediation or relationship counselling** for households at risk from relationship breakdown. This is particularly relevant for young people but can be successful with all age groups.
- consider **Housing First support** as an option for households with complex needs who are currently housed, but at risk of repeat homelessness.



- ensure you have clear homelessness prevention pathways in place for: young people; those experiencing domestic abuse; those experiencing commercial sexual exploitation; migrants who cannot access public funds; LGBTQ+; gypsy/ travellers.
- strengthen **Section 11 processes with RSLs**, PRS landlords and creditors, reviewing the timing and the quality of your response to these.
- focus housing management approaches within the social rented sector on **early warning and intervention**, which facilitate tenants' access to independent advice, advocacy and housing support.
- target, strengthen and test approaches with public institutions which **prevent households being discharged to homelessness**; Housing First is the default approach for those with complex needs.



The Prevention Review Group will report to Scottish Government by autumn 2020 on a broad homelessness prevention duty on public bodies which is expected to be enacted 2021. Meantime HARSAG recommended that the spirit of this framework be considered, planned for and where possible implemented as follows:

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### Local authority duties:

- to complete a housing and support assessment for households who are at risk of homelessness in the next six months.
- to undertake a mandated set of steps where there is homeless risk, captured in Personal Housing Plans (PHPs).
- to adopt an approach of 'maximal housing options' for rehousing prevention and full duty cases, whereby housing must be both 'settled' (available for 12 months minimum) and 'suitable' (tailored to household need).
- to act on referrals from wider public bodies.

### Public body duties:

(including health and social care, social landlord, prisons and police)

- to ask about a household's housing situation where there is a risk of homelessness.
- to act on homelessness risk, as specified for each public body.
- not to discharge into homelessness without a managed pathway.



## **Helping Hand**



HARSAG made a range of recommendations for Scottish Government and other key partners to **prioritise prevention** which can support local authorities to progress RRTPs. These include:

- a **national advice** and **information strategy** on what people should do if they find themselves at risk of homelessness. To be supported by the launch of a national public awareness campaign to reduce stigma and prompt early action.
- **national learning** and **sharing programme** of **what's worked** to prevent homelessness and obtain settled housing in year one of RRTPs, including evaluation of Housing First Pathfinders, with practical resources for local authorities.
- a national equalities assessment on the impact of COVID-19 on homelessness risk for particular groups, which can inform and complement local analysis.
- **continued investment** in Discretionary Housing Payments (DHP), Scottish Welfare Fund (SWF) and funding for dedicated money advice, welfare advice and housing rights support.
- legislation and supporting work on preventing eviction from rented housing. This includes
  - extending the current period of forbearance for notices from 30 September to 31 March (now expected).
  - extending the Tribunal's existing discretionary powers from a 6 to 18-month period.
  - providing greater protections for tenants already facing eviction before the pandemic.
  - implementing strong pre-action protocols for the PRS and making these permanent.
  - obtaining more data from the First Tier Tribunal, to allow full transparency on its operations and the ability of PRS tenants to assert their rights.
  - establishing mechanisms which end evictions into homelessness from rented housing, including consideration of how PRS fits with prevention duties; consideration of regulatory aspects; and sharing of best practice amongst landlords
- national **financial modelling** to calculate the likely costs of future homelessness spend if prevention action is not accelerated, properly funded or prioritised highlighting national pressure points.

# **2| Settled Housing Options**

We all have the potential to live a good life — and home is the best base from which to build it



Recommendations to mitigate against a post-COVID spike in homelessness by broadening the supply and range and quickening access to settled housing options locally. In a nutshell, HARSAG recommendations invite local authorities to:

- firmly balance the range of settled housing options toward ordinary housing in ordinary communities, not 'homeless' places.
- think **beyond social housing** and **maximise** all available **housing options**, with a particularly strong emphasis on what the PRS can offer locally.
- use evidence to **re-evaluate** impact of COVID-19 on **housing needs** and **housing options** locally.
- agree an adequate proportion of social lets to homeless households for an emergency period to address backlogs created during the pandemic. This should be at a level that supports rapid rehousing and reduces the numbers of people in temporary accommodation. Engagement with local housing associations is key to enabling this.
- develop and implement options for particular groups who may have specific housing needs or circumstances, such as young people, women with complex needs and people with no recourse to public funds.

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To enable more settled housing options, useful tools local authorities could have in place include:

- processes to conduct post-COVID **audits** of the **housing needs** (by size, type, area) of homeless households, the **available housing options** and **assessment of market changes** to inform action. For example, does the LHA change potentially open up PRS options of the right size and locations to meet housing shortages identified in your original RRTP?
- commitments from local authority housing departments and/or Registered Social Landlords (RSLs) to restart lettings (including pre-letting tenancies) and to increase allocations to homeless households on a temporary basis.
- local strategies to create additional affordable rented supply, including targeted acquisition of private stock for social rent (making use of any 2020/21 AHSP underspend, if possible); implementing or stepping up buy-back schemes; promoting Mortgage to Rent; increasing empty homes work, including by offering enhanced grant support to owners.
- a local scheme/service to facilitate PRS access, with a procurement strategy which prioritises use of PRS for settled housing, while also servicing local need for temporary accommodation.
- joint referral and assessment procedures with Health & Social Care Partnerships for allocation of specialist accommodation for people who do not want, or for safety/risk reasons cannot be offered, a Housing First tenancy. Note a current research programme reporting early 2021 on the role of supported accommodation as a response to homelessness in Scotland.



- upscale options to convert self-contained temporary accommodation to settled tenancies if households choose to stay.
   'Flipping' has generally been used in social rented accommodation, but the approach could be extended to the PRS to convert from temporary accommodation to a Private Residential Tenancy.
- scale-up and diversify your Housing First service, making use of social and PRS stock to redress disadvantage first, including women with complex needs, people leaving institutions and young people.
- **step up 'empty homes' activity** making use of incentives (enhanced grants) and targeting owners with homes most needed by homeless households. Agree priority allocations via the local PRS access service.



- **maximise** use of the **PRS** as a move-on option. Make sure PRS is part of your market audit and borrow good practice from rent deposit services and social lettings agencies which already operate.
- develop and implement **tailored housing options** for groups with specific housing needs and circumstances: young people, those experiencing domestic abuse, gypsy/travellers and people with no Housing Benefit entitlement.



- **start-up** your **Housing First service**, making use of additional social and PRS stock to benefit those with the greatest disadvantage first.
- **pilot** a **shared tenancy option**. This may be especially attractive in less affordable markets and areas with high levels of unsuitable temporary accommodation. The model may be especially suitable for some younger people.

## **Helping Hand**



HARSAG made a range of recommendations for Scottish Government and other key partners to **increase housing supply and options** which can support local authorities to progress RRTPs. These include:

- Government commitment to invest in affordable housing supply from 2021-26, using an agreed definition of affordability linked to household income. Supply should meet figures <u>set out in recent research (53,000</u> affordable homes, of which 37,100 socially rented), targeted to areas of greatest need.
- a range of **national measures** to secure funding and support to **increase affordable supply:** 
  - a National Challenge Fund, inviting ideas from partners across all sectors to increase housing supply, in the immediate term (2020-21).
  - work with social investors to secure low cost capital to increase housing supply in the medium to longer-term, targeted to areas with greatest shortages.
  - explore alternative funding and investment models, including role of Scottish National Investment Bank.





- national effort to prioritise existing social housing supply programme as construction restarts.
- national procurement approach to support repair and furnishing of socially rented voids.
- national measures enhancing PRS supply and access including:
  - consideration of a nationally funded or underwritten bond scheme.
  - assisting and resourcing capacity-building for local authority engagement with private landlords.
  - exploring options for landlords to sell properties with tenants in situ.
  - working with landlord insurance providers to remove "no benefit claimant" clauses.
  - accelerating legislation to enable local authorities to regulate short-term lets.
- **national framework** to support **rapid scaling** of **Housing First** in all areas; stabilising funding for Pathfinder providers with considerations of national commissioning/procurement options.
- for Scottish Government to pursue a right to adequate housing through a Human Rights Bill.

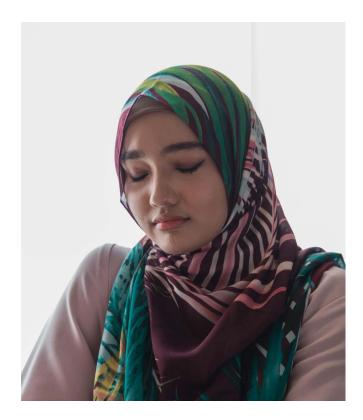
# **3 | Equalities Competence**

People's experiences of homelessness are very different



Recommendations to increase inequalities sensitive policy and practice because some groups are more impacted by, overrepresented in, or excluded from the homelessness system. In a nutshell, HARSAG recommendations invite local authorities to:

- gather and analyse evidence of COVID-19 impact on homelessness risk and the housing and support needs of equalities groups, including those accommodated during pandemic, and use to inform services.
- offer **bespoke prevention**, **support** and **housing pathways** for young people, households experiencing domestic abuse, migrant homeless households, people leaving state institutions, LGBTQ+ households and gypsy/travellers.
- ensure **at risk groups** are included within the next revision of **RRTPs.**





To enable equalities-competent policy and practice, local authorities should have in place:

- Equality Impact Assessment determining differential impact of COVID-19 on homelessness risk and service access locally, to inform and take forward mitigating actions.
- a strategy and procedure for meeting housing needs of **homeless households** with entitlement to public funds, but **who do not** (or no longer) **have statutory duty** (i.e. duty discharged).
- a **local domestic abuse strategy** which sets out tenure-specific protocols for supporting households, has housing representation at Multi-Agency Risk Assessment Conferences (MARACs), provides domestic abuse training for staff, is multi-agency in approach, including local Violence Against Women Partnerships, and, during COVID-19, enables access to immediate advice and accommodation (including for those with no access to public funds). Having a specific and dedicated domestic abuse strategy recognises that domestic abuse is the most common reason for women's homelessness. Domestic Abuse: good practice guidance for social landlords, published by SWA and partners provides more information.
- **multi-agency case management protocols** with statutory partners, for households with complex needs who do not fall under Social Work statutory duties.
- an assertive multidisciplinary outreach strategy in areas where people continue to sleep rough.
- ability to facilitate access to immigration advice, repatriation support and social work assessment for households with no access to public funds.

PACE
& SCALE

- recognise that women's and men's experiences of homelessness are different. Mainstream equality throughout the planning process and ensure plans respond to meet the different needs of women and men in housing and homelessness.
- expand **Housing First** as the default option for households with complex needs; specifically extend Housing First services for people leaving state institutions and for women with complex needs.
- continue to offer temporary accommodation and support to households with **no recourse to public funds**, and link with the <u>national route-map</u> on this theme to explore together alternative accommodation and funding options for this group.



- analyse cases in which contact has been lost, offers refused or duties discharged. Make plans to reduce incidences of these and **improve housing outcomes** for all groups.
- ensure pathways into services are gender-sensitive and offer access to specialist support for people experiencing domestic abuse or engaged in commercial sexual exploitation.
- adopt a **prevention approach** centred on enabling survivors of **domestic abuse** to remain at home in all cases where this is their preferred option.



- put in place a **prevention**, **access**, **support** and **advice** pathway specific to **young people** which considers their particular service access, communication, affordability and employability needs.
- link EEA nationals in with support, where needed, to apply to the EU settlement scheme.
- link **EEA nationals** with no Right to Reside and those with **leave to remain** and an NRPF condition into **employability services** and support to access onward housing.

## **Helping Hand**



HARSAG made a range of recommendations for Scottish Government and other key partners to **improve an equalities approach** which can support local authorities to progress RRTPs. These include:

- a national equalities assessment on the impact of COVID-19 on homelessness risk for equalities groups, which can inform and complement local analysis. The Ending Homelessness Together action plan is to be adjusted on this basis.
- supported by national guidance and linking to joint <u>route-map</u> on this theme, Housing Options Hubs to act as response coordinators for people with **no recourse to public funds**, including rights and awareness training for local authority colleagues.
- working with the national Change Team, **learning from experiences of people affected** and involved, alongside a broader piece of commissioned research on the impact of the COVID-19 pandemic.
- national guidance on the intentions and exemptions within the Unsuitable Accommodation Order.
- rapid implementation of legal changes on intentionality and local connection provisions.
- **guidance** to **local authorities** which clarifies their responsibilities, within the rapid rehousing framework, to homeless households who do not have, or have lost, statutory duties.
- programme to support EEA nationals to apply to EU settlement scheme, including access to independent specialist, including OISC accredited, advice, housing and benefits advice, and information and technology required to apply.
- **exploration of social security changes** in Scotland, to enable people with NRPF to be supported. This might be through creating new benefits within devolved powers or changing eligibility criteria of devolved benefits so entitlement to reserved benefits is not sole qualifying criteria.

There are also central asks of the **UK Government** that a range of organisations will continue to campaign and lobby on:

- temporarily suspend NRPF conditions for at least 12 months for people with NRPF restrictions on their VISA, so they are able to access Universal Credit and homelessness assistance.
- temporarily suspend the Habitual Residence Test (HRT) so EEA nationals can access benefits.
- provide more clarity on which funds local authorities can use for people seeking or refused asylum.
- extend suspension of evictions from asylum accommodation, so no one is evicted into homelessness.

# **4** Responsive Systems

An enabling homelessness system with no wrong door



Recommendations on local homelessness systems and considering the extent to which COVID-19 has impacted locally, including on temporary accommodation, services and support. In a nutshell, HARSAG recommendations invite local authorities to:

- reduce competitive culture and inefficiencies in homelessness systems with good commissioning and procurement practice.
- continue to **flip temporary accommodation** into settled tenancies and **roll-over this stock** where possible.
- ensure support, advice and community connections for all households that need it. Strengthen partnership contributions to tailored needs assessments and transitional support for households moving to settled housing.
- continue to move away from congregate, institutional temporary accommodation options, including designing-out hostels and dormitory style night shelters from local responses.





To enable responsive homelessness systems, useful tools local authorities could have in place include:

- a Homelessness Contribution Statement from HSCPs, setting out contribution to alleviating and preventing homelessness.
- clear agreements between Housing and Health and Social Care/NHS (including occupational health, mental health and harm reduction) on responsibilities, remit and role supporting households moving into settled housing post-COVID-19.
- a clear, accessible **communications strategy** on where all households can get advice, support and accommodation, including specific focus on people not entitled to public funds and those experiencing domestic abuse.
- **plan to redress use of temporary accommodation** during and post-pandemic which is balanced toward the rapid rehousing objective of ordinary homes in ordinary communities.
- processes to conduct frequent audits of the support needs (including health needs) of homeless households, and map against available support capacity locally, for those households accommodated in hotels exceptionally during the pandemic



- implement or upscale options to **convert self-contained temporary accommodation** to **settled tenancies**, where households want to stay.
- develop **temporary accommodation** which may suit particular groups, and which adhere to the Unsuitable Accommodation Order, such as community hosting, flat-sharing or caravans (for example, to meet needs of for young people, destitute households or gypsy/travellers).



- triage households presenting for temporary accommodation by COVID-19 status, ensuring households who need to selfisolate are able to do so.
- ensure households with **no recourse to public funds** have access to immigration advice and practical support. And for EEA and other households for whom work unlocks housing, offer employability support.
- lost contacts, refusals and non-statutory homeless households. How can you reduce the proportion of these? What can you do to ensure they still get a housing outcome?



- addressing the UAO. Actions to reduce unsuitable temporary accommodation while expanding housing options.
- offer **temporary accommodation** to any household who would otherwise sleep rough, regardless of immigration status or statutory duty, with access to basic amenities, food, Wi-Fi and digital support.
- ensure all homeless households have a Personal Housing Plan (PHP), which addresses health needs and equalities issues

   and which now includes digital access and support. This includes households accommodated exceptionally during the
   pandemic, of whom a by-name list setting out move-on options and plans should be created and acted on.

## **Helping Hand**



HARSAG made a range of recommendations for Scottish Government to **improve the responsiveness of homelessness systems** which can support local authorities to progress RRTPs. These include:

- national commitment and leadership on action to end homelessness beyond current five-year period, reviewing sequencing in Ending Homelessness Together action plan and identify and share national best practice on what works.
- build this expectation into Scotland's **National Performance Framework** with specific indicators to measure progress and effective links across Scottish Government directorates.
- **review** housing and homelessness **Regulatory Framework** to encompass implementation of all HARSAG recommendations and to ensure consistent enforcement of existing housing rights
- clear messaging to local authorities on what is expected in relation to their response for people with no statutory entitlements.
- **national guidance** on processes for infection management and effective social distancing within temporary accommodation.
- additional Scottish Government funding provided in key cities for people to be accommodated in hotels, short-term lets and other temporary accommodation during lockdown. Support should continue to be targeted to authorities with the highest homelessness presentations across this period and with the highest number of people now in temporary accommodation.
- **national recognition** and **accelerated workforce development** for front-line housing and homelessness staff as key workers who play a critical role in social care provision.
- clarity on **Unsuitable Accommodation Order** exemptions (guidance on this is imminent) and legally enforceable **standards** for **temporary accommodation**, to be implemented as quickly as possible.
- learning from urgency of Covid-19 response and build on joint working, reducing competitive culture and inefficiencies in the homelessness system.

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