



Homeless Action Scotland

Consultation  
Funding  
for  
Supported Housing

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## Consultation Funding for Supported Housing

### Homeless Action Scotland

Homeless Action Scotland is the national membership body for organisations and individuals tackling homelessness into Scotland. We are grateful for the opportunity to respond to the Consultation on Funding for Supported Housing. We have restricted our comments to our specialist areas of knowledge.

Homeless Action Scotland has a long-standing interest in the welfare system and Homelessness and in recent years have worked with the DWP to ensure homelessness and the needs of people who are homeless is taken into consideration when deciding on changes, and rolling these out.

### Executive Summary







-  Emergency and Crisis accommodation should be calculated on a daily basis, rather than weekly or monthly.
-  All Supported Housing should have funding processes that allow for transitory situations, where people are in accommodation for very short periods of time.
-  Putting a maximum length of stay to an accommodation type can result in it becoming the 'average length of stay'. Having no maximum can have a positive outcome, and be more person centred.
-  People living in Supported Accommodation should be aware of and involved in the decision of rent being paid for their accommodation.
-  Funding pots that are provided on an annual basis can result in uncertainty for service users and organisations, as well as money spent on continuous administering of the application and receipt of funds. Longer funding times should be considered.
-  We recommend that current timescales are postponed, providing the opportunity to gain useful findings from pilots as well as a better understanding of UC full roll out.
-  LHA does not provide the full picture of funding needs for supported accommodation, it would be worth considering other funding allocation systems that take account of the diversity of supported accommodation.
-  The application of SAR to supported accommodation would result in accommodation closing due to a lack of funding and accommodation restraints.
-  The current system makes living in Supported Accommodation and retaining or taking up employment impossible. New systems should stop this from being the case
-  The transition from Supported Housing to other types of accommodation should be considered, ensuring a positive move does not become negative through poor systems.

## Homelessness and Supported Accommodation in Scotland

Scotland continues to see homeless figures for people accessing help through their Local Authorities decrease, with the most recent annual statistics from the Scottish Government 2015 / 16 demonstrating there were 24,891 cases assessed as unintentionally homeless in Scotland<sup>1</sup>, a decrease of 6% on the previous year. Though anecdotal evidence suggests that hidden homelessness; examples including sofa surfers and people staying in unsafe relationships to retain a roof over their head, is on the increase. Also, recent figures from Glasgow Homelessness Network show that 2015/ 16 saw over 1000 different individuals sleeping rough across Glasgow over the 12-month period.<sup>2</sup> It is reasonable to expect figures for people rough sleeping to be comparable in relation to population, in each of the Local Authority areas across the country.

Despite steady reductions in approaches to Local Authorities for homeless assessments, discussions with our members across the country have proven that in the majority of areas, bed spaces in supported accommodation of all types remains close to 100% throughout the year. We are also aware that there is an increase in the support needs of those accessing the provisions; thus, impacting on move on timeframes and possibilities.

In Scotland, we have several different housing provisions for people who are homeless:

-  Emergency and crisis accommodation (including refuge accommodation)
-  Temporary accommodation without support
-  Temporary accommodation with support (not always provided directly by the accommodation)
-  Supported accommodation on a temporary basis
-  Supported Accommodation on a permanent basis
-  A small amount of Housing first tenancies in a few areas of the country

The above fall into several different types of accommodation including furnished flats / houses, bedsits, B&Bs, purpose built provisions, scatter flats, to name a few. These are not all HMO properties, but where support is provided, they are registered by the Care Inspectorate.

### Q 1. Separate Funding Models

Fair access to funding, the detailed design of ring fence and whether other protections are needed for client groups to ensure appropriate access to funding, including for those without existing statutory duties.

#### Local Authorities administering top up funding

1. Homeless Action Scotland supports a top up fund being devolved to Scotland, and money to be distributed via Local Authorities. We do not support a UK wide system, given the differences in our corresponding legislation and statutory duties.

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<sup>1</sup> <http://www.gov.scot/Resource/0050/00508824.pdf>

<sup>2</sup> <http://www.ghn.org.uk/>

2. In consultation with relevant bodies, we would request there to be guidance from the Scottish government outlining how the fund should be used, allowing the fund to be used with consistency across the country, but taking into consideration the needs of the area.
3. We would request that the money be ring-fenced, and should work in accordance with Housing (Scotland) Act 1987 and the Housing (Scotland) Act 2010, which brought in the housing support duty.<sup>3</sup>
4. We would also suggest to allow for the fund to be increased by Local Authorities if appropriate; encouraging further health and social care integration to be considered when deciding on sizing the pot.
5. Homeless Action Scotland would request the pot allocation and use is monitored alongside other housing statistics.
6. Given we have a robust and highly regarded body in the Care Inspectorate, we would suggest that in Scotland, registration with the Care Inspectorate is a condition to receive funding.
7. From 1993 Scottish Homes used a 'Special Needs Allowance Package' banding system to allocate housing management costs. We recognise the language used within this is very outdated, but would suggest considering this type of model for allocations. LHA rates can only give part of a picture of the very diverse nature of supported accommodation, and so looking at other models may provide a more useful overview.
8. Finally, we would recommend the pot be considered at every spending review and the sizing not to become stagnant or arbitrary.

## Q2. Fair access to funding – the design

How should the funding model be designed to maximize the opportunities for local agencies to collaborate, encourage planning and commissioning across service boundaries, and ensure local commissioning bodies can have fair access to funding.

9. Homeless Action Scotland would strongly agree that a top up fund should be ring fenced to allow continued funding for people who are vulnerable.
10. Homeless Action Scotland would recommend that guidance for Scotland includes collaborative working across Housing Option Hub areas, allowing people to have a broader range of provisions available to them across several Local Authorities.

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<sup>3</sup> <http://www.legislation.gov.uk/asp/2010/17/section/158>

11. We would suggest the funding is then split with different calculation periods and processes:
  - a) to allow for a separate calculation and process for emergency and crisis accommodation,
  - and b) to cover for short periods of time in accommodation that is generally used for longer stays and
  - c) to cover longer and more stable periods of time in supported accommodation.
12. We would suggest that sheltered accommodation is considered as a separate accommodation type, with an entirely separate process. The finer details to these are in the following paragraphs.
13. *a) Emergency & crisis accommodation:* Our main concern with upcoming changes is with processes for people accessing very short stays (1 to 5 nights) in emergency / crisis accommodation (of all types). It is important that the costs for these don't fall through the cracks, and is not paid for through any part of the new system. We would hope there is a process implemented to cover this sort of circumstance and that it is one that causes no worry to either the claimant or the accommodation provider.
14. In addition to the importance of a process incorporating emergency and crisis accommodation, we would recommend that the calculation formula for the funding for this accommodation type is done daily, rather than the monthly calculation that has been mentioned for other areas of accommodation. Emergency and crisis accommodation is not for use for periods as long as 4 weeks or a month, making a monthly rate unworkable and therefore the recovery of funds impossible.
15. *b) to cover for short periods of time in accommodation that is generally used for longer stays* Short stays should also be considered for more general supported accommodation, as it is not unusual in the first instance for a stay to be less than a week. This is particularly the case where someone has multiple and / or complex needs; though is not limited to these cases by any means.
16. In fact, there are many instances where someone may only choose to stay in an accommodation provision for a short amount of time and move on to another, out with homeless provisions, or may leave somewhere without notice as well as removing themselves from the benefits system entirely. We would request there to be some process in place for this common occurrence. We would recommend that this is a process that doesn't result in vulnerable people owing money to organisations and feeling they don't want to access support with them in the future, or for support organisations needing to be asking for significant sums of money from people they are supporting. This will lead to a very different relationship, and is unlikely to encourage a supportive role to thrive; this could lead to being detrimental to the outcomes for the person requiring support. There is a transitory element to all supported housing that must be considered with new processes.
17. *c) to cover longer and more stable periods of time in supported accommodation* We recognise that calculating all accommodation on a daily basis is unnecessary and would cause higher administrative costs than necessary, so would look to include a process that was

suitable for longer stays in accommodation. This could be calculated in line with UC and sit as a separate process to the emergency / crisis and shorter stays.

18. Looking at the longer-term picture, we don't see the addition of a timeframe becoming part of a definition of what supported accommodation is, as useful. This can result in the opposite effect, where as a result of there being a number, for example '2 years' in place, that becomes the time someone spends in that accommodation place almost as an expectation than limit. Therefore, we see no gain from a number being added to this.
19. Currently we have systems working against one another, one in particular, is where someone is residing in supported housing and is in employment. The current system makes it close to impossible to remain in paid employment and live in supported accommodation, due to the costs needed to pay for the rent whilst there, often leaving the resident in debt or with not enough money to get by. Any new system should work to enable and encourage someone in a supported accommodation to be able to either remain in employment or take on new employment whilst residing there. This should also be an easy system to work with, not adding cumbersome processes with unworkable timeframes imposed.
20. New funding allocation, systems and processes should not prevent future scoping and improvements, but instead should encourage new and improving models of accommodation to be piloted and implemented.
21. Finally, we would ask for there to be an element of the processes that allows the person in whichever type of accommodation to know that however the money is paid, that there is rent being paid for them to be residing there. Too often people in receipt of housing benefit for supported housing state "I don't pay rent" which can be very disempowering. It is important that people feel they are paying for the accommodation and that rent is exchanging hands on their behalf, and notably, with their agreement. This ties in with the working and ethos of Self Directed Support.

### Q 3. Local Allocation

[How can we ensure that local allocation of funding by local authorities matches the local needs for supported housing across client groups.](#)

22. In relation to allocation for supported housing for people accessing homelessness accommodation services, Scotland currently records and monitors the use of provisions across authorities and number of homeless assessments made. This is collected by every Local Authority and collated every 6 months by the Scottish Government.
23. It goes without saying that uncertainty of funding can be very negative both to tenants and organisations. It can also result in costs; where staff are unsure of the longevity of their post, they are more likely to start moving on, resulting in costs for recruitment and training of

replacement staff. This can be alleviated by providing as much notice of security of funding as possible, as well as providing funding for longer periods of time.

24. Administering funding is costly both to apply for, as well as be applied. We would look to have a minimum of 3-year funding for accommodation that falls within this category.
25. There should also be consideration taken of areas that are currently building, in areas now with Full UC live service. There should be discussions both from a strategic as well as practical level at how this could be prevented with the implementation of a new system.

#### Q 4. Other Protections

Do you think other funding protections for vulnerable groups, beyond the ring fence, are needed to provide fair access to funding for all client groups, including those without existing statutory duties?

26. We would seek an element of flexibility within the funding to cover security for exceptional cases, for example, where someone in supported housing becomes ineligible to be in receipt of public funds. People in these circumstances are extremely vulnerable, and the provision of supported housing could not only provide the best outcomes for the person or household, but would negate (often more costly) resources coming from other less relevant funding streams.
27. We understand that there is a commitment not to impose the Shared Accommodation Rate (SAR) to Supported Housing, but would like to take this opportunity to further emphasise that we would not welcome any change to this. We see no positives from applying Shared Accommodation Rate to supported housing, and can only envisage organisations not managing to meet the shortfall, resulting in closures. Having discussed this with members across the country, there have been no organisations seeing this in any other light.

#### Q 10. Smooth Transition

The Government wants a smooth transition to the new funding arrangement on 1<sup>st</sup> April 2019. What transitional arrangements might be helpful in supporting the new regime?

28. To allow for suitable pilots and planning to take place, we would strongly recommend the consideration for the timescales before roll out to be longer. Rectifying issues arising from UC in general prior to this change would also allow for a smoother process when changes are implemented.
29. We would back the idea of several pilots for the new system, *if* there was a significant number of objectives that could be looked at through these. But in light of our previous paragraph, the ability to provide as much notice of upcoming changes is very important factor, and so we

would not wish it to impact negatively on the time for planning for these changes. Thus, we would see pilots as useful tools where there was significant learning to be taken from them and timings were not limited too far as a result.

## Q 12. Emergency & Crisis Accommodation

We would welcome your views on how emergency and short term accommodation should be defined and how funding should be provided outside UC.

Please refer to paragraphs 13 to 16 for details.

Homeless Action Scotland gives full permission for this submission to be published.

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