

Agenda Item	11.
Report No	HP/21/22

## HIGHLAND COUNCIL

**Committee:** Housing and Property Committee

**Date:** 17 November 2022

**Report Title:** Homelessness and Rapid Rehousing Transition Plan

**Report By:** Executive Chief Officer Housing and Property

### 1. Purpose/Executive Summary

1.1 This report provides an update on: -

- Actions that the Council is taking to implement our Rapid Rehousing Transition Plan; and
- Progress in response to new legislation in relation to the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2004 amended 2020.

### 2. Recommendations

2.1 Members are invited to: -

- i. **NOTE** progress on the Council's Rapid Rehousing Transition Plan and actions undertaken to mitigate homelessness in Highland;
- ii. **APPROVE** the Annual Update of the Rapid Rehousing Transition Plan attached as **Appendix 1** for submission to Scottish Government; and
- iii. **AGREE** amendments to the Homelessness Appeals Process as detailed in the report.

### 3. Implications

3.1 **Resources** – The Council has received funding of £1.4m since 2018/19 from the Scottish Government to assist with the implementation of our Rapid Rehousing approach to homelessness.

3.2 **Legal** – A review of homelessness policy is ongoing to bring current policy up to date in relation to changes to legislation and guidance. Further reports on policy will be provided to Committee following Scottish Government confirmation of changes nationally.

- 3.3 **Community (Equality, Poverty and Rural)** - Although case numbers are highest in Inner Moray Firth, there are also complex challenges in rural communities. As set out in the Plan, if rapid rehousing of homeless applicants is prioritised then this will decrease the availability of housing for other housing needs groups. A full Equality Impact Assessment was completed in June 2019.
- 3.4 **Climate Change / Carbon Clever** - There are no implications arising from this report.
- 3.5 **Risk** - There are financial and regulatory risks associated with changes to homelessness policy and practice which require to be managed during implementation.
- 3.6 **Gaelic** - There are no implications arising from the report.

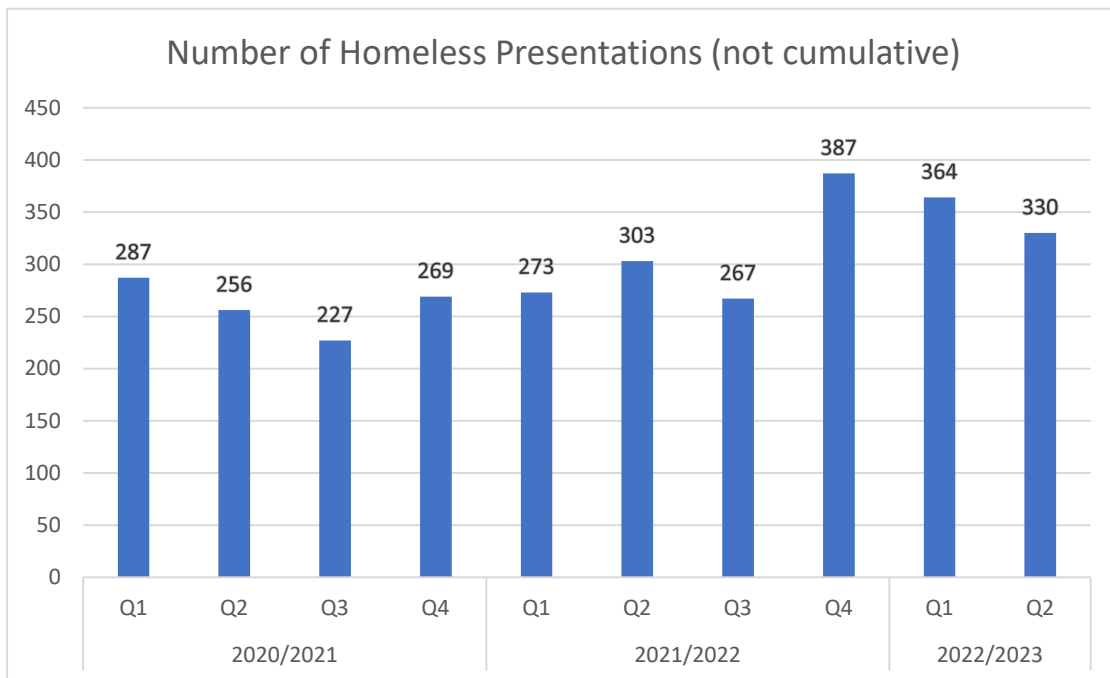
#### **4. Policy Background and National Policy Objectives**

- 4.1 The Programme for Government announced by the First Minister on 5 September 2017 set out a new commitment to eradicate rough sleeping, transform the use of temporary accommodation in Scotland and end homelessness. Ministers subsequently established the Homelessness and Rough Sleeping Action Group (HARSAG) to make recommendations on how these transformational changes could be achieved.
- 4.2 In response to the recommendations made by the Homelessness and Rough Sleeping Action Group the Scottish Government and the Convention of Scottish Local Authorities (COSLA) published the “Ending Homelessness Together” action plan in November 2018. This included the recommendation that all local authorities produce Rapid Rehousing Transition Plans to document how they would tackle homelessness.
- 4.3 Where homelessness cannot be prevented, Rapid Rehousing is defined as follows:
- - a settled, mainstream housing outcome as quickly as possible;
  - time spent in any form of temporary accommodation reduced to a minimum, with the fewer transitions the better; and
  - when temporary accommodation is needed, the optimum type is mainstream, furnished and within a community.
- 4.4 For clients with multiple and complex support needs beyond housing, a Housing First model is recommended. Housing First is based on the following premises:
- housing is a basic human right, not a reward for an applicant demonstrating that they are able to sustain a secure tenancy; and
  - once the chaos of homelessness is eliminated from a person’s life, stability occurs faster and is more enduring.
- 4.5 The Council continues to experience very significant pressures in relation to homelessness. A service already stretched with housing demand far exceeding available supply has been placed under additional stress as a result of:
- the Coronavirus-19 pandemic;

- the extension to the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2004 amended 2020 (detailed at section 10 of this report); and
- the current challenges as a result of the cost-of-living crisis.

4.6 Table 1 below highlights the number of homelessness presentations over the last three financial years. The last three quarters report a significant increase in comparison to previous ones. This increase of presentations has primarily come from households leaving homes in the private sector or with family/friends.

**Table 1 - Homeless Presentations per Quarter (not cumulative)**



4.7 Table 2 below provides details of the numbers of HHR applicants per area who have homeless points and the number of HHR lets in 2021/2022 to applicants with homeless points.

**Table 2 – Percentage of Lets to Homeless Households in 2021-2022**

Area	All HHR Lets 2021-2022	No. of Lets to applicants with homeless points	% of Housing & Transfer Lets allocated to homeless applicants	% of Housing List Lets only allocated to homeless applicants
<b>Badenoch &amp; Strathspey</b>	47	64	53.2%	71.4%
<b>Caithness</b>	285	16	14.7%	19.6%

<b>Inverness</b>	713	417	58.6%	85%
<b>Lochaber</b>	173	65	39.3%	54.4%
<b>Nairn</b>	55	23	56.4%	75.6%
<b>East Ross</b>	294	55	39.1%	58.7%
<b>West Ross</b>	22	16	27.3%	37.5%
<b>Mid Ross</b>	215	86	47.9%	67.3%
<b>Skye&amp; Lochalsh</b>	132	50	60.6%	82.5%
<b>Sutherland</b>	97	9	23.7%	28.8%
<b>Total</b>	<b>2033</b>	<b>801</b>	<b>44.8%</b>	<b>62.9%</b>

## 5. Highland Rapid Rehousing Transition Plan (RRTP)

- 5.1 Following approval by the Care, Learning and Housing Committee, the Council's initial Rapid Rehousing Transition Plan was submitted to The Scottish Government in April 2019. The purpose of the plan is to be a working document, subject to regular review and amendment in order to meet legislative requirements, but also to address any locally identified issues or changing needs. The 2022 return was submitted to the Scottish Government on 30 June 2022 and is attached at **Appendix 1**.
- 5.2 The main workstreams are described below.

## 6 Rapid Rehousing Officers

- 6.1 Rapid Rehousing Officers focus on our longest duration homeless cases to identify and overcome any barriers which have up until now prevented these clients from being housed permanently.
- 6.2 The case-holders engage creatively and positively with clients and key partners in respect of any unmet needs which might prevent these service users from sustaining a tenancy successfully.
- 6.3 During 2021/22, 63 long-term homeless cases were reviewed by the Rapid Rehousing Officers. Of these, 30 households were housed permanently, 28 households are being actively reviewed for permanent outcomes, and 5 cases were closed for other reasons, including lost contact, or the client successfully returning home.

## 7 Housing First

- 7.1 The Inner Moray Firth Project continues to be funded through the Highland Alcohol and Drug Partnership [HADP]. HADP funding is aimed at vulnerable individuals at higher risk of alcohol and drug-related harm and death. Additional funding from HADP has been secured to set up a similar approach in the Caithness area during 2023.
- 7.2 The project has seen improved outcomes around rent arrears; reduced offending /associated custodial responses; and increased uptake of primary mental/ physical health care.

- 7.3 There are currently 10 Housing First tenancies in Highland. 2 other clients are awaiting allocation of secure tenancies.
- 7.4 A formal evaluation is underway with HADP colleagues to evaluate the approach further and inform wider service development. This will inform a review of how the service benefits those in the substance-related harm group and what model of service provision might benefit lower-risk groups of vulnerable individuals.
- 7.5 The project and team members are engaged in piloting Trauma-Informed Approaches to complex need client groups and best practice in supporting staff delivering services to these groups.

**8. Shared Tenancies**

- 8.1 The use of shared temporary accommodation continues to assist the Council in meeting Scottish Government regulations regarding unsuitable accommodation.
- 8.2 To date the Council has established 40 shared properties as detailed in the table below, accommodating 80 clients in 2-person shared units.

**Table 3 – Shared Tenancy Properties in Highland as of 14 October 2022**

Area	Number of tenancies
Inverness	27
Ross & Cromarty	6
Nairn	1
Fort William	6
<b>Total</b>	<b>40</b>

- 8.3 The model remains an effective alternative to placements in Houses of Multiple Occupancy. It is popular with service users in terms of affordability, quality of accommodation and available peer support.
- 8.4 A positive outcome has been improved tenancy-related behaviour in the shared tenancy model. Over the past 6 months, the Council has received only 5 anti-social behaviour complaints from neighbours of TFA share properties. 4 of these complaints were resolved quickly through informal advice and guidance with the 1 other complaint being resolved through identifying an alternative sharing arrangement.

**9. Empty Homes and Private Rented Sector Liaison**

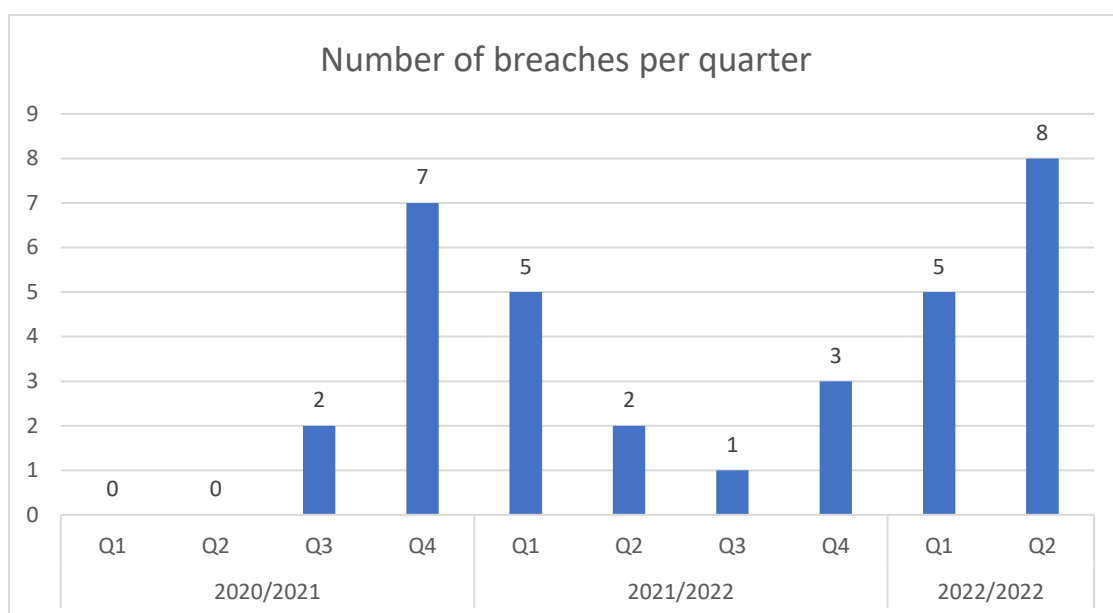
- 9.1 In August 2021, an Empty Homes and Private Rented Sector Liaison Officer was recruited to attempt to bring empty private properties back into use and to develop effective relationships and partnerships with the private rented sector.

- 9.2 There is a current caseload of 120 empty properties under review. To date, 6 properties have been brought back into use which reflects the level of long-term engagement and support required to assist owners in this process.
- 9.3 There has been further proactive engagement with the private rented sector. An inaugural private landlord engagement event was held in July 2022. The session was aimed at providing advice and information to landlord to help support tenancies in the private rented sector. The session covered a number of themes, such as, mediation, energy efficiency, welfare and housing support, and landlord accreditation. The session was attended by over 60 landlords and was very positively received.
- 9.4 A partnership has been agreed with Landlord Accreditation Scotland to offer training opportunities to private landlords and the opportunity to become an accredited landlord.

**10. Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2004**

- 10.1 The previous “Unsuitable Accommodation Order” mandated that ‘bed and breakfast-type’ accommodation must not be used for more than 7 days (in total) for any homeless households which contained children or pregnant women. The Scottish Government extended the Order to **all** homeless households from 30 September 2020.
- 10.2 At the time of the extension, it increased the number of households in scope of the Order from approximately **300** to **850** households.
- 10.3 Since 2020/2021 there have been 33 breaches of the Order. This is detailed below at Table 4.

**Table 4 – Performance Against the Unsuitable Accommodation Order**



- 10.4 In response to the challenges of the extended Order, the Council is increasing its stock of self-contained temporary accommodation. Table 5 below shows the current position compared to the previous 5 years.

**Table 5 – Type of Temporary Accommodation**

Accommodation Type	May 2018	May 2019	May 2020	May 2021	July 2022
Council-owned Temporary Furnished Accommodation	227	305	377	431	439
Council Owned TFA Share*	8	17	10	26	39
Leasing Scheme Properties	151	152	162	185	177
Framework B&B / HMO	226	217	189	166	142

*\*number of TFA Share properties not rooms*

## 11. Homeless Prevention

- 11.1 The Scottish Government have established a Prevention Review Group to make recommendations on a statutory Homeless Prevention duty in Scotland. The recommendations will:

- introduce a new homeless prevention duty onto Local Authorities which begins six months from which the household is at risk of homelessness;
- place a duty on public services to prevent someone leaving an institution (like prison or hospital) from being homeless when they leave;
- include an “Ask and Act” duty upon other public bodies such as the NHS, education services, Scottish Prison Service and the Scottish Court Service;
- strengthen social and private sector tenants’ rights surrounding eviction processes.

- 11.2 The ‘Ask and Act’ duty will require public bodies to identify any housing issues at an early stage, and ‘Act’ where a problem is identified to ensure that individuals get the right support to prevent homelessness. This will include acting within their own powers or referring to the appropriate help and assistance.

- 11.3 Once the exact detail of this new homeless prevention duty is known we will develop our Homeless Prevention approach with key partners.

## 12. Changes to Local Connection in Homelessness Legislation

- 12.1 A Local Connection means that if a homeless applicant is unintentionally homeless with a Local Connection to Highland, the Council must accept a full homeless duty towards the applicant. Applicants without a Local Connection to Highland have

previously been referred to a local authority where they do have a Local Connection and that local authority would accept a full homeless duty towards them.

- 12.2 The Scottish Government announced that it will suspend elements of Local Connection from 29 November 2022. The suspension prohibits Scottish local authorities from making a Local Connection referral to another relevant Scottish local authority. However, they will still be allowed to make a Local Connection referral to a relevant English, Welsh or Northern Irish local authority. Guidance has been issued to officers in order to manage any increased demand or pressures on services.

### **13. Homelessness Appeals Process**

- 13.1 Under homelessness legislation, a homeless applicant has the right to appeal a negative homeless decision or a discharge of homeless duty. They will continue to receive temporary accommodation during this appeals process.
- 13.2 Highland currently operates a 2-stage appeals process. The first stage involves a written assessment of the case conducted by a senior officer. If the client appeals against the first stage decision, the second stage involves an in-person panel hearing comprising of senior officers, including legal representation and an elected member with formal training (if available).
- 13.3 Feedback from clients has identified that the process is very formal and significantly extends the decision-making period. The current process is designed around assessing evidence of compliance with traditional legal tests of homelessness rather than on individual client circumstances within the “rights based” legal framework for that now exists for homelessness.
- 13.4 An internal review of the appeals process has taken place to align it with the current Scottish Government Code of Guidance on Homelessness. It is proposed that the current practice of a second stage appeal in Highland should be removed. This would mean a single stage internal appeal heard by senior officers focussing on whether the decision was reasonable with regard to the client’s needs and in line with the Code of Guidance. Clients would have the right to be present and have independent representation at the appeal.
- 13.5 This change aims to:
- bring Highland in line with current practice across Scotland;
  - increase the speed in which appeals are processed;
  - reduce the amount of administrative time officers must commit to appeals;
  - and
  - provide a person-focused approach to the appeals process rather than a focus based on legislative tests.
- 13.6 Clients will have a right to a further external appeal via judicial review of the Council’s decision making if they remain unhappy about the outcome of the Council’s internal appeals process.



Designation: Executive Chief Officer Housing & Property

Date: 27 October 2022

Authors: Brian Cameron, Service Lead – Policy & Performance;  
Gail Ward, Homeless Services Manager

Background Documents: Homelessness and Rough Sleeper Action Group Report; Scottish Government Guidance on Rapid Rehousing Transition Plans.

# Rapid Rehousing Transition Plan: 2019-2024

## June 2022 Update

### 1. Introduction

- 1.1 The Homelessness and Rough Sleeping Action Group (HARSAG) was established by the Scottish Government in October 2017. The Scottish Government accepted the majority of recommendations of the HARSAG in June 2018. This included the recommendation that local authorities produce Rapid Rehousing Transition Plans.
- 1.2 The overall aim of the Rapid Rehousing Transition Plan is to set out the Council's approach to achieve rapid rehousing where homelessness cannot be prevented. Rapid rehousing is defined as:-
- Providing a settled, mainstream housing outcome as quickly as possible.
  - Reducing time spent in any form of temporary accommodation to a minimum, with the fewer moves between temporary accommodation the better;
  - When temporary accommodation is needed, the optimum type is mainstream, furnished and within a community.

### 2. Highland Council Rapid Rehousing Transition Plan Update

- 2.1 The council is currently reviewing our Service structure, this will include a focus on the homeless service improvements required to meet the commitments of this RRTP and well as emerging priorities from the legislative changes being implemented by the Scottish Government around Homeless Prevention and statutory homelessness.
- 2.2 The Highland five-year RRTP was designed to be a working tool that the council committed to continuously review, evaluate, and evolve its approach over the lifetime of the plan. This update to the Highland RRTP reflects the successes of our RRTP activity to date and includes new activities that we plan to implement during 2022/23 as we develop new approaches to prevention.
- 2.2 The Council's RRTP plan continues to meet the initial objectives to modernise our homelessness service to fit the priorities highlighted by HARSAG and to tackle homelessness in Highland by transforming our service provision to
- Prevent rough sleeping in Highland,
  - Transform our temporary accommodation and
  - Permanently house households facing homelessness in Highland as rapidly as possible

### 3. Strategic Context

- 3.1 The Council's Local Housing Strategy was approved in December 2017 and is currently being updated. The Council is committed to reviewing the Strategy in 2022-23. The main objectives of the existing Strategy are:-
- 3.2 Increase the supply of housing in Highland so that we have enough homes in the right places to meet housing needs-
- People are supported to live independently for as long as possible in their own homes and communities;

- Prevent and respond to homelessness and make sure people have the right help to let them make decisions on their housing options; and
- Improve the Quality and condition of the housing stock and minimise fuel poverty.

3.3 In relation to homelessness our strategic approach is:-

1. Prevent homelessness wherever possible;
2. Improve and increase access to housing advice and information services;
3. Enable access to the right type of housing;
4. Provide support to enable people to develop and maintain their capacity to live independently;
5. Ensure that housing support services focus on achieving positive outcomes and sustainable solutions for clients;
6. Work towards providing the majority of temporary accommodation in Council-owned properties;
7. Ensure rents in temporary accommodation are affordable as possible for people on low incomes and within the welfare benefits system;
8. Reduce the time people spend in temporary accommodation;
9. Continue to implement a protocol on accommodation for looked after children to prevent homelessness;
10. Review partnership / interagency approaches to clients with complex needs;
11. Aim to minimise the use of large-scale HMO accommodation for younger single homeless clients;
12. Review the future options for temporary accommodation; and
13. Review and considering future specialist accommodation models linked to consideration of Housing First type approaches.

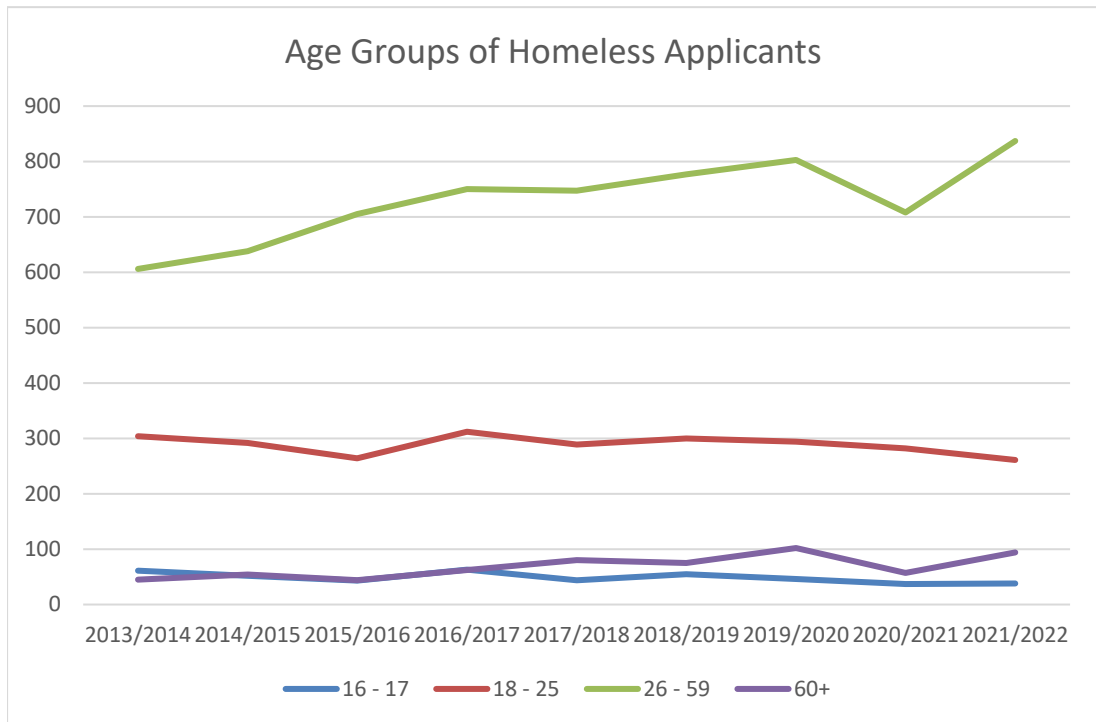
3.4 The Council's Strategic Housing Investment Plan 2022-2027 was approved on 15 December 2021. The strategic targets for affordable housing provision contained in the SHIP tables are fully consistent with our current Local Housing Strategy targets of around 500 units per annum.

#### 4. A Profile of Homelessness in the Highlands

4.1 Since 2013/14 homeless applications have remained relatively stable at between 1,000 and 1,200 per year. There was notable increase in 2016/17 which has stabilised. The drop in applications in 2020/21 was due to the impacts of the Covid-19 pandemic.



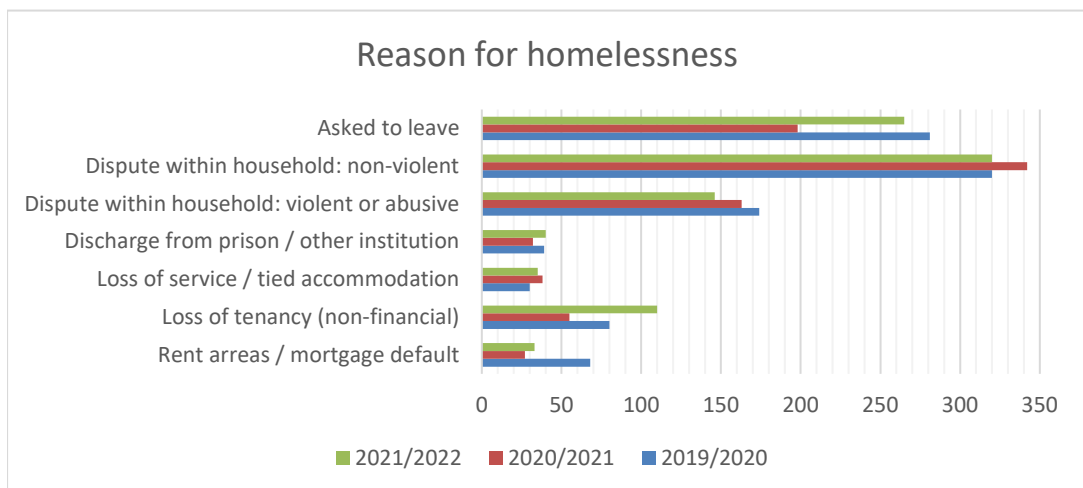
4.2 The age categories of homeless applicants have changed since 2013/2014. Trends show a general decrease in 16- to 25-year-old homeless applicants and a general increase in 26+ year old homeless applicants. The graph below highlights these trends.



4.3 The single biggest group of homeless applicants are 26 – 59 years olds accounting for around 64% of applicants on an annual basis. This compares to around 4% of applicants aged 16 – 17, 25% for the 18 – 25 years and 6% the 60+ years categories.

4.4 The gender mix of homeless presentations remains stable since 2013/14 with the average proportion being around 46% female and 54% male.

4.5 The main reasons for people becoming homeless from 2019 to 2022 are shown in the chart below:-



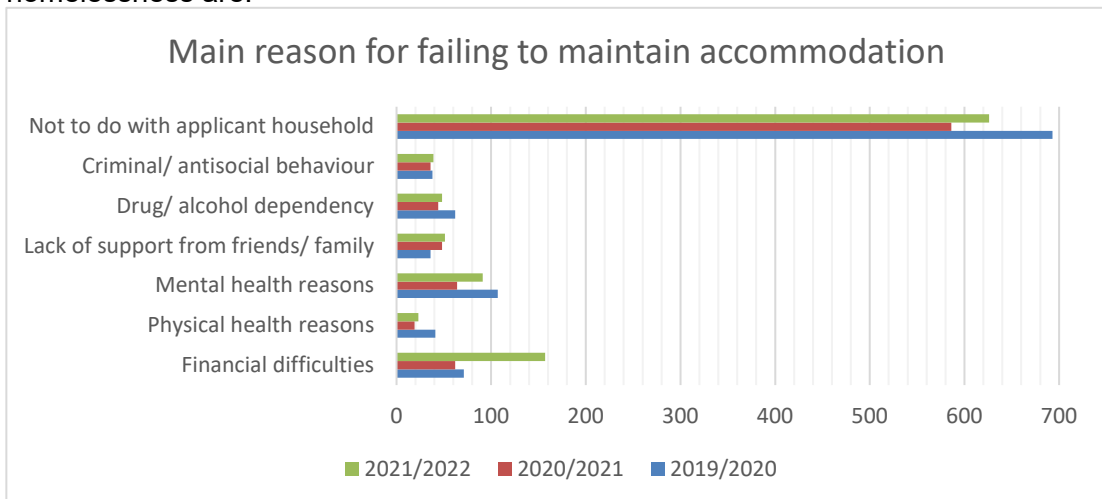
4.6 Most applicants became homeless following a non-violent dispute within the household whether with a partner or parent. Loss of tenancy for non-financial reasons has nearly doubled from last year while homelessness on account of rent arrears or mortgage default has only increased slightly. The continual low number of rent and mortgage related evictions reflect the fact that the Covid eviction restrictions were still in place. Eviction restrictions were less restrictive for other grounds not relating to rent arrears and the increase in non-financial related evictions may reflect this fact.

4.7 The Covid eviction restrictions ended in March 2022 and there are concerns that this will lead to an increase in private sector evictions. Furthermore, the cost-of-living crisis may result in greater numbers of private sector arrears evictions and tenancy terminations.

4.8 In 2021, the Scottish Government launched a Covid Tenant Fund designed to help pay the rent arrears of social and private sector tenants who fell into arrears because of Covid. The Highland Council spent a total of £295,563.19 from the Highland allocation of £297,000. This has prevented homelessness from across these sectors. The table below details where this money was allocated.

Landlord Type	Number of tenants who received a grant	Total Amount
Private Sector	12	£37,431
The Highland Council	148	£145,709
Registered Social Landlord	81	£112,423.19

4.9 The main factors that applicants identify themselves as having contributed to their homelessness are:



4.10 This shows that in most cases homelessness is not due to any specific factor or underlying issue. Most homelessness can be resolved with a housing outcome without additional support / professional intervention. Financial difficulties have increased greatly over this year which reflects the growing cost of living crisis.

4.11 On average around 8% of people who present as homeless report having slept rough at some point in the last 3 months prior to presentation and around 6% on the night before presenting.

4.12 Around 6% of homeless applicants have been looked after children. In 2021/2022, 47 people had left care 5 or more years ago and 17 within the last 5 years. In 2020/2021 the figures were 51 and 14.

4.13 Around 4% of homeless applicants are ex-forces personnel. In 2021/2022, 31 people had left the forces 5 or more years ago and 7 within the last 5 years. In 2020/2021 the figures were 31 and 7 respectively.

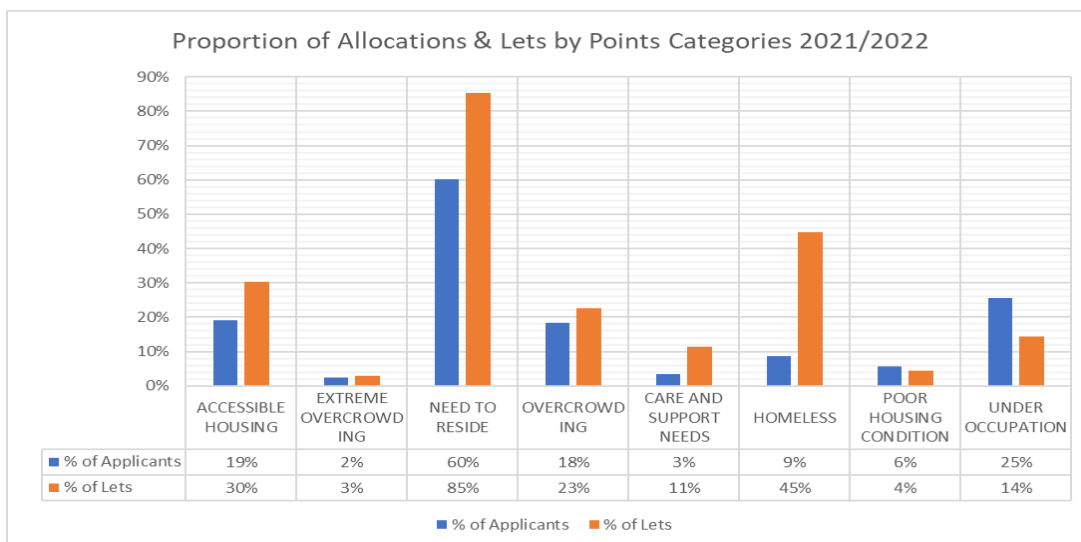
## 5. Local Housing Supply and Demand Issues

5.1 The Council operates a Common Housing Register and shared Housing Allocations Policy with the main Registered Social Landlords in Highland. This is called the Highland Housing Register (HHR). The HHR allocations policy is needs based, with points awarded to applicants according to housing needs categories. We operate a choice based letting scheme in Caithness where there are specific low demand issues.

5.2 We undertake an annual monitoring report on the Highland Housing Register. As of the 31st of March 2022, there were 9,416 applicants on the housing register. This represents a slight decrease from last year which stood at 9,959. In 2019/20 before Covid-19, the total number stood at 7,785.

5.3 Covid-19 had a major impact on housing and the HHR. Many figures in 2020/2021 were lower than previous years due to restrictions slowing down or pausing work while other figures have risen. Figures have, on the whole, returned to pre-pandemic trends as services began to operate at normal levels.

5.4 The table below shows the main housing needs points categories and the proportion of people housed last year with these needs:



5.5 In developing and implementing this R RTP the Council needs to balance the needs of homeless households with the need to address other categories of urgent housing need, such as those with urgent medical conditions or living in overcrowded or poor-quality housing. We also need to consider areas where we cannot achieve rapid rehousing for all cases within the current housing market.

5.6 Highland’s LHS sets the targets for affordable housing which between 2021 – 2026 aims to deliver 500 units pre-annum. The table below highlights where these units would be built

<b>Housing Market Area</b>	<b>Units Approvals per year</b>	<b>Unit approvals over 5 years</b>
Badenoch & Strathspey	30	150
Caithness	20	100
Inverness	220	1100
Lochaber	40	200
Nairn	30	150
East Ross	50	250
Mid Ross	50	250
Wester Ross	15	75
Skye & Lochalsh	30	150
Sutherland	15	75
Highland	500	2500

5.7 Areas with greatest housing pressure are being targeted most for units. Furthermore, to rapidly re-house homeless households, the majority of these units will have to be 1 or 2 bedrooms. As of 31/03/2022, 73% of all homeless applicants had a one bedroom need and 17% have a two-bedroom need (90% of all homeless applicants).

5.8 We work with our HHR partner landlords to award sufficient homeless priority to these property types to allow us to meet our homeless demand more rapidly by 2024.

5.9 The Local Housing Strategy is under review and an updated version will be presented to Housing & Property Committee and to the Scottish Government during 2022-23. The review will involve engagement with all relevant stakeholders.

5.10 The Highland Housing Need & Demand Assessment (HNDA) was reviewed in 2021-22 and a draft update was submitted to the Scottish Government for appraisal. The outcomes of the HNDA will be included both the review of the LHS and in the future Strategic Housing Investment Plans.

## **6. Emerging demand issues**

6.1 Further pressures on housing supply have emerged in recent years as a result of the various refugee resettlement programmes. Highland remains committed to supporting these programmes but analysis of the additional pressure on housing supply will need to be factored as part of the LHS review.

6.2 The Homes for Ukraine scheme could result in an increase in homeless presentations. It is possible that some of the placements may fail or the Ukrainian displaced persons will be asked to leave after six months. This will place additional strain on our temporary and permanent accommodation. The majority of these presentations will likely have children.

## **7. Accommodation Pressures**

7.1 The table below sets out numbers of homeless applications made in Highland where a positive determination has been made and a duty to house permanently has been

established. A duty also exists for these cases to provide Temporary Accommodation whilst a permanent housing outcome is identified.

Number of Homeless Presentations Made in 2021-22 where a duty to house has been established.

Area	Household Bedroom Need					Total	%
	1	2	3	4	5+		
Alness	65	13	8	5	1	92	8%
Badenoch & Strathspey	40	22	6	1	-	69	6%
Dingwall	120	32	17	4	-	173	15%
Inverness	302	144	58	18	7	529	45%
Lochaber	85	5	1	1	-	92	8%
Nairn	29	7	3	-	-	39	3%
Portree	77	11	1	3	-	92	8%
Sutherland	22	2	2	2	-	28	2%
Thurso	18	1	1	-	-	20	2%
Wick	30	2	1	-	1	34	3%
<b>Total</b>	<b>788</b>	<b>239</b>	<b>98</b>	<b>34</b>	<b>9</b>	<b>1168</b>	

- 7.2 This distribution of cases has been relatively static over the last 5 years. Most homeless presentations are made in Inverness and will reside in temporary accommodation in Inverness while they await an offer of housing there.
- 7.3 Wider housing pressure also has an impact on the length of time people spend in temporary accommodation.
- 7.4 Higher average length of stay in temporary accommodation is directly related to the availability of social rented housing. Generally, the areas where we have the highest numbers of homeless cases and the longest average stays in temporary accommodation are the areas where we are allocating the highest proportion of housing to homeless households.
- 7.5 It means that in our most pressured areas, households spend much longer living in temporary accommodation compared to other areas. In lower demand areas of Highland applicants can obtain a homeless outcome much more quickly.

## 8. Current Provision of Temporary Accommodation

- 8.1 Historically the Council has relied on privately rented single rooms or bed and breakfast type shared accommodation, with less than a third provided through the Council's own stock. The pattern of temporary accommodation has also varied across areas, with most private sector provision in Inverness.
- 8.2 Since 2014 we have had an active programme of shifting the balance of accommodation towards the uses of Council owned, self-contained furnished accommodation, with a target of increasing this provision by 50 units a year.
- 8.3 The table below shows our temporary accommodation provision since 2018 and highlights our shift from HMO style accommodation to self-contained furnished accommodation.



Accommodation Type	May-18	May-19	May-20	May-21
Council-owned TFA	227	305	377	431
Council Owned TFA Share	8	17	10	26
Leasing Scheme Properties	151	152	162	185
Framework B&B / HMO	226	217	189	166

## 9. Future Temporary Accommodation Provision

- 9.1 The Council's long-term strategy for temporary accommodation is to increase use of self-contained, furnished Council or Housing Association property, and reduce reliance on private sector properties. This provides best quality for clients at least cost to the Council.
- 9.2 The Community Services Committee agreed in April 2016 that we should move to a model where the majority of temporary accommodation is provided in Council owned (Housing Revenue Account) properties. We currently have 431 HRA properties used as temporary accommodation, an increase of almost 40% since April 2017.
- 9.3 We aim to continue to increase the use of HRA furnished accommodation by 50 units a year over the next 5 years (total 250 units). This will eliminate the use of PRS HMO accommodation for anything other than emergency / crisis response.

## 10. Temporary Accommodation & The Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2020 Compliance

- 10.1 Highland's current use of 'unsuitable' temporary accommodation for single homeless applicants is detailed below. While these accommodations are 'unsuitable', we are not in breach of the Unsuitable Accommodation Order because the occupant has sole use of the shared facilities, or the occupant has refused an offer of suitable accommodation. Highland's current use of 'unsuitable' temporary accommodation for single homeless applicants is detailed below. While these accommodations are 'unsuitable', we are not in breach of the Unsuitable Accommodation Order because the occupant has sole use of the shared facilities, or the occupant has refused an offer of suitable accommodation.

Use of 'Unsuitable' temporary accommodation		
Area	Number of clients in unsuitable temporary accommodation	
	4 May 2021	4 May 2022
Inverness	3	0
Ross & Cromarty	19	9
Lochaber	8	4
Total	30	13

- 10.2 The drop to zero in Inverness cases reflects that Inverness no longer uses temporary accommodation that is unsuitable.
- 10.3 In 2021/2022 the Highland Council breached the Unsuitable Accommodation Order 3 times

- 10.4 In response to the challenges of the revised UAO, the Council has been increasing its stock of self-contained temporary accommodation and developing our use of shared temporary homeless accommodation (Shared TFA) as noted below.
- 10.5 We have also been working with Private Rented Sector providers to redevelop this B&B type 'Unsuitable' temporary accommodation into better quality UAO compliant forms of temporary accommodation however this has not been possible in all our contracted PRS temporary accommodation.

## 11. **RRTP Activity Update: Council Tax / Non-Domestic Rates Bankruptcy Notices**

- 11.1 The Highland Council's Revenues Team currently raise proceedings to petition for bankruptcy as part of recovery action in cases of Council Tax or Non-Domestic Rates arrears. These cases can place households at risk of homelessness as recovery action of this kind is usually taken by the Council when a debtor is known to own a significant asset.
- 11.2 Corporate arrangements for referrals between the Council's Revenues and Housing Options Teams are in place to ensure that all appropriate Revenues recovery cases are highlighted to the Council's Housing Options Team and efforts made to prevent homelessness.

## 12. **Move on Project**

- 12.1 The Move On Project is funded by the European Social Fund and match funded by the Highland Council. The project's key focus is to tackle inequality, poverty, and deprivation, in line with commitments detailed in the Highland Outcome Improvement Plan
- 12.2 The main objective of Move On is to assist clients who are disengaged from statutory and third sector services. This is achieved by providing a holistic proactive service. Move On officers coordinate tailored support to assist disadvantaged individuals and families who may be facing multiple life and social challenges.
- 12.3 The project aims to
- reduce homeless presentations & increase tenancy sustainability
  - maximise incomes
  - develop financial capability
  - build resilience and life skills
  - eventually move towards positive employment
- 12.4 Since the project started in 2018, 190 tenants (across all tenures) have been referred for support. Of these 69 social housing cases saw a reduction in total rent arrears of £55,975, this equates to an average reduction of £811 per household.
- 12.5 The Move On project has been successful in re-engaging tenants who consistently disengage which impacts on their homelessness and ability to sustain their tenancy.

## 13. **Shared Temporary Furnished Accommodation (TFA)**

- 13.1 Due to the shortage of UAO compliant one-bedroom temporary accommodation, the Council undertook a pilot scheme in Inverness and Ross & Cromarty to allow two people to share a two- or three-bedroom Council property as their Temporary Accommodation whilst they awaited a permanent outcome to their homelessness.

- 13.2 Initially homeless applicants with no or low support needs living in B&B type temporary accommodation have been offered this model of temporary accommodation. At the end of the pilot period, we opened up the offer to those with medium support needs to further reduce 'Unsuitable' temporary accommodation use.
- 13.3 We currently have shared tenancies in Inverness and Ross-Shire, Nairn and Fort William.
- 13.4 The gross rent levels charged in the shared temporary accommodation units in Inverness is £57.98 which is based on one half of the standard 2 bed HRA rent for the property with homeless service charges added in respect of furnishings etc. Ross Shire's rents are slightly higher at £69.46 due to the use of larger 3 bed properties.
- 13.5 The comparable rent for a single person PRS B&B type / HMO room procured through the Council is currently £ 185.92 per week.
- 13.6 The benefits of our Shared TFA model are significant in terms of quality and affordability. The project is still in its' development stage and the benefits and outcomes will continue to be assessed on a regular basis.
- 13.7 A Matching Process and a Tenancy Induction have been developed to identify and match candidates and set expectations and 'ground rules' for sharers. This process has been based on the Sharer's Toolkit developed by Crisis titled 'A Shared Approach Setting up and Supporting Tenancies in Shared Houses'. An Occupancy Agreement has also been drafted for use by the Council's Legal Team.
- 13.8 Candidate pools are naturally larger around urban population, where a pool of candidates is limited, matching options can be restricted and require a more intensive approach.
- 13.9 Key tasks of the team include matching of clients, signup and benefits processes, turnover of voids and management of the tenancy, low level ASB and 'breach of tenancy' matters.
- 13.10 Based on the projection of 30 units per year over the five-year period, the table below details the position at the end of April 2022, in comparison to our projected outcomes.
- 13.11 Projected Shared Tenancies

Year	2019/2020		2020/2021		2021/2022		2022/2023		2023/2024	
	No	Units	No	Units	No	Units	No	Units	No	Units
Projected	15	30	30	60	45	90	60	120	75	150
Actual	20	40	26	52	42	84				
Difference	5	10	-4	-8	-3	-6				

- 13.12 At the present time, the number of units is sitting at 84, 6 below the projected number of 90 by the end of year 3. Of these 84 units, 15 are currently void. (12 units are currently awaiting void maintenance), 69 units have live tenancies.

- 13.13 It is anticipated that the Shared TFA team will be self-funding by year 5 of this R RTP using savings made from a reduction in spot purchase HMO contract rooms. Over the summer of 2022 we intend on transferring the shared tenancy function over from a centralised team and mainstreaming the function within the local area teams.

#### **14. Housing Support Housing Support Provision**

- 14.1 Short-term housing support is important to help reduce homelessness and increase tenancy sustainment. There is a legal requirement to assess and provide access to short-term housing support where needed for all homeless and potentially homeless people.
- 14.2 The annual budget for short-term housing support services is £1.54m, delivered through a framework agreement divided into four geographical lots across Highland, with an additional lot providing accommodation-based housing support. Overall, four Providers operate across the different lots, these include New Start Highland, Salvation Army, Right There (formerly Y People) and Gateway (Highland Homeless Trust).
- 14.3 Currently there are, around 470 households receiving short-term housing support at any one time. This includes around 10 people in specialist supported accommodation services. The average number of households receiving short-term housing support has reduced over the last 12 months, in the main this is due to challenges being faced by the Health and Social Care sector in relation to recruitment and retention as well as ongoing staff absences and not as a result of a reduction in clients requiring support. The Service is working with Housing Support providers to try and resolve these challenges to ensure that the Council meets its legal obligations to provide this service.
- 14.4 In March 2022, the Council approved an extension to the current framework arrangements for Housing Support and Supported Accommodation Services up until March 2024. This extension is to allow the Housing Service time to review the approach to service delivery in order to meet the requirements of short-term housing support needs, Housing First, rapid rehousing, the ongoing challenges presented by Covid-19, the developing cost of living crisis and to offer more robust support to tenants residing in the private rented sector.
- 14.5 As part of our ongoing service delivery, and future service design we are currently reviewing the process for monitoring and reviewing the progression of support. In particular this is focusing on client engagement with support, a multi-agency approach and managing 'exit strategies' that will minimise long-term dependency on support and / or identify those clients who have longer term support needs and need assistance to access specialist support services. Consultation has begun with the private rented sector to develop support packages for tenants who may be struggling in this type of tenure. We recognise that minimising homelessness presentations from the private sector is a key challenge, and we aspire to develop this key area of work in line with our future prevention strategy.

#### **15. Supported Accommodation**

- 15.1 At present Highland has 35 supported accommodation units commissioned as a separate lot on the housing support framework, this consists of 4 private rented sector HMO properties which the Provider leases. This includes, one 3-unit property

located in Invergordon and 33 units dispersed across 3 Inverness based properties. The rent and property management costs are recouped through the rent charges, usually covered through Housing Benefit.

- 15.2 In April 2021, the Council introduced a 'test and learn' pilot pathway to support service users transitioning through supported accommodation to a more permanent housing outcome. Over the first year of the pathway, the number of service users residing in this type of accommodation has reduced from 35 to approximately 10 on average at any point in time.
- 15.3 We are currently working with the accommodation provider and NHS Highland to review the use and status of the accommodation to determine other client groups who may have use of the accommodation in the future. Exploring our use of supported accommodation and the type of accommodation that is needed across Highland will be included in the review of the Housing Support service over the next 12 months.
- 15.4 We will continue to focus on the needs of this client group and assess and identify their barriers to long term tenancy sustainment, and source the appropriate solutions and services to meet these needs.

#### **16. Trauma Informed Events (TIE) / Psychologically Informed Environments (PIE) - Training for Housing Teams**

- 16.1 As a result of a greater general awareness of how Adverse Childhood Events and trauma affects homeless service-users and contributes heavily to entrenched and repeat homelessness, staff training around this is under development.
- 16.2 The training will be hosted in partnership with NHS Highland. The aim of the training will be to provide insights and understanding of core skills:
- Adverse Childhood Events;
  - Severe and multiple disadvantages and;
  - Evidence based interventions (what works with) trauma and delivering psychologically informed support.
- 16.3 This training also seeks to further develop our peer-based supervision model for reflective practice and supervision. Particular topics that will be covered will include;
- psychological awareness,
  - engagement skills,
  - motivational interviewing,
  - solution focussed practice,
  - adding Reflective Practice to staff support & development meetings,
  - what trauma is and how it impacts people,
  - how to recognize the signs of trauma in an individual.
- 16.4 The objective of these sessions is to develop an evidence-based understanding of the challenges faced by Housing staff when carrying out their casework and also develop an understanding of key TIE & PIE theories and how they translate into daily practice in their role when working with service users with complex support needs.

## 17. Highland Housing Register Review

- 17.1 The Council undertakes an annual review of the HHR allocations. This ensures that the Council and all our HHR partner landlords are effective in achieving outcomes and meet their statutory and regulatory obligations.
- 17.2 Several aspects of our HHR allocations policy affects lets to homeless applicants. These elements are being revised as part of the review to consider their impact on Rapid Rehousing in Highland within the five-year transition plan period and beyond.
- 17.3 These changes to HHR points categories and working practises are designed to assist Housing Officers to better identify housing needs to ensure homeless and those with unmet housing needs are prioritised for a permanent outcome as part of a holistic housing options process.
- 17.4 Public consultation results show an overall positive response from the public and key partner agencies as to any changes being proposed.

## 18. Care Experienced Young People

- 18.1 The Highland Care Leavers Housing Options Protocol details our approach to working with care leavers needing rehoused in crisis with more challenging needs and our commitment to supporting relationships through consistent services.
- 18.2 Highland is running training and networking sessions to raise awareness of 'what works re. moving onto independent living.
- 18.3 Last year 17 care leavers were housed by HHR Partners. This is an increase from an average of 10 'Protocol' lets over the past 4 years. Shared efforts to keep care leavers approaching us in crisis out of traditional homeless accommodation are proving successful.
- 18.4 Priorities to 2024 are:
- To work with colleagues to ensure that every young person in care is encouraged, enabled and empowered to 'stay put' remaining in positive care settings until they are ready to move on - and, during this time, is helped to prepare for successful independent living.
  - To establish an approach in line with the 'Housing First for Youth' model for young people at high risk of chaotic 'homeless careers'
  - Supporting housing and support officers to use relationship-based approaches, based on understanding, empathy, respect, and 'stickability' – and informed by the experiences of tenants with lived experience of leaving care
  - Offering a wider range of 'stepping-stone' options including shared tenancies
  - These priorities are in line with Highland Corporate Parenting Plan 2018 and the Scotland's 'Improving Care Leavers Housing Pathways'

## 19. Housing First

- 19.1 In 2019, Highland Council and NHS Highland were awarded funding to develop a Housing First (HF) project by the Highland Alcohol & Drugs Partnership (HADP) with a specific focus on homeless service users with complex needs who were at high risk of drug or alcohol related harm. Highland Alcohol & Drugs Partnership (HADP) funding for Housing First, focusses on service users who are experiencing high risk of drug and alcohol related harm. The intensive case management necessarily involved in these cases has seen positive progress in terms of :
- compliance with drug and alcohol recovery;
  - uptake of primary health care;
  - reductions in offending; related custodial consequences and
  - tenancy sustainment and related rent compliance.
- 19.2 In February 2020, Housing First Highland accepted its first referral into its multi-disciplinary team and now has ten clients receiving intensive wrap-around support. All ten clients are housed in secure tenancy across the Inner-Moray Firth with the Council and RSL partners. There are currently 13 clients on the Inner Moray Firth Case load. Regrettably, there have been 3 fatalities amongst the case load since the project commenced in February 2020.
- 19.3
- 19.4 Adhering to the Housing First Principles is recognised as key to its success. The Inner Moray Firth Pilot has developed its own understanding of and applied those principles to the local context. Those principles focused around achieving a secure tenancy have presented challenges in terms of available stock. Some of those latterly joining the case load have remained longer in temporary accommodation. This necessarily impacts in terms of fully fostering a comprehensive sense of ontological security for clients. Nonetheless provision of self-contained non-congregated accommodation has seen improvements while clients awaited secure tenancy outcomes.
- 19.5 The ability to flex the overall team resource in order to maintain capacity for those graduating from Housing First, who may need to return to the case load at a later date is currently being reviewed.
- 19.6 The Council aspires to develop a Housing First Aftercare pathway as an alternative means to deliver our Corporate Parent duties around Housing and support for care experienced young people with multiple & complex needs.
- 19.7 The project is also in the process of implementing a Rural Housing First pilot in Caithness building on the learning from the Inner Moray Firth pilot. HADP funding for a Rural Housing First initiative has been agreed and recruitment is underway. The team make up broadly replicates that of the Inner Moray Firth pilot. The context for the service however differs in it's non-urban setting and differing housing stock context. The focus for the rural project will remain on entrenched homeless lifestyles [albeit for vulnerably housed individuals] and on those at higher risk of substance mis-use related harm.
- 19.8 We are currently working with the Highland Alcohol and Drug Partnership is developing an evaluation model for our Housing First pilot project will be used to ensure critical indicators are being met and project outcomes are being delivered and crucially to examine the benefits of the approach to service users.

## 20. **Private Rented Sector & Empty Homes**

- 20.1 The Council's Empty Homes and Private Rented Sector (PRS) Liaison Officer has been in post for 9 months. The officer is focussing on developing our strategies on empty homes and the PRS, along with working to bring empty homes back into use, developing relationships with the private rented sector, developing support pathways for the sector and working to sustain tenancies in the PRS sector.
- 20.2 Alongside initial work to develop a PRS strategy, the officer has worked to develop relationships with the sector locally, along with planning a focussed session/forum with landlords which will take place late July 2022. We will be taking forward themes identified through the Crisis survey of private landlords in 2019, to further develop relationships and support the sector. The session will also offer broader information and advice on key issues for the sector, such as tenant participation in the PRS and advice on energy efficiency. Future sessions will be directed by issues which matter to landlords locally.
- 20.3 A key feature of how we aim to support PRS landlords is the development of a holistic 'toolkit' offering of support for the sector to both sustain and hopefully create new tenancies in the PRS. We will encourage landlords to contact us at an early stage so that we can assess how best we can offer support to prevent homelessness. In addition, we are working with Landlord Accreditation Scotland to develop an offering of training for PRS landlords.
- 20.4 Alongside initial work developing an empty homes strategy, the officer has built up a significant working caseload of empty homes across Highland. This caseload is a blend of reactive and proactive activity. We currently anticipate achieving our initial target of bringing 10 properties back into use, late within year one of the project.
- 20.5 We have developed a local empty homes partnership group, comprised firstly of services within the Highland Council, including Planning, Building Standards and Environmental Health. This group seeks to: take a partnership approach to long term problem empty homes, have effective information sharing protocols and to pool resources to bring empty homes back into use.
- 20.6 Partnership working is of paramount importance across both PRS and empty homes work. We have begun to develop firm relationship foundations with the PRS, which we hope will be further developed through our ongoing work to engage and support the sector.
- 20.7 We have developed a PRS/Empty homes working action plan which is included at Appendix 1. The plan has been updated as of May 2022. The action plan outlines activity to date in more detail and where our focus will be over the coming months.

## 21. **Partnership Working & Consultation/ Engagement** **Partnership Working**

- 21.1 Discussions are ongoing with key partners regarding Rapid Rehousing in Highland, these discussions have involved the 3rd sector partners, HHR Partners, the Health & Social Care Team and HADP.
- 21.2 In addition, we have been working with the North & Islands Hub on a programme of stakeholder RRTP events. These are ongoing and have involved various partners including the Scottish Government, Scottish Housing Network, NHS Highland, HHR partner landlords, Care & Learning, the 3rd Sector and the Private Rented Sector.



21.3 The following Specific RRTP partnership working arrangements are in place:

**Housing First Steering Group** The Housing First Steering Group has been set up as a subgroup of HADP The Group includes all key partners and stakeholders. The group is meeting frequently to deliver on scaling up Housing First in Highland.

**Highland 3rd Sector**

There will be specific consultation and engagement developed in respect of the 3rd Sector in Highland. Including RRTP discussions at Inverness Foodstuffs (Homeless Charity), and Homeless Action Inverness meetings

**Private Rented Sector**

Inner Moray Firth landlord forum, to be set up upon conclusion of the Crisis PRS consultation exercise, will involve PRS landlords, lettings agents as well as key HC Housing and Licensing contacts. The third sector will also be invited to take part in this.

**Highland Housing Register Management Group**

Consultation is ongoing with the HHR Management Group in respect of the allocations policy review and the potential impact that Highland's RRTP will have on the review. There will be regular RRTP updates and discussion at the Management Group.

**Highland Housing Development Hub**

Discussions with Highland's Housing Development Hub relating to RRTP have begun. Regular updates will be given to the Hub in respect of RRTP actions and outcomes to ensure that the Council's homeless housing need and demand is reflected in the development mix of Highland 's SHIP.

**22. Service User Consultation/Engagement**

22.1 The Council worked with Engage Scotland on a service user consultation exercise targeting homeless service users in homeless accommodation in Highland, this is part of the Scottish Housing Regulator's work with their National Panel of Tenants and Service Users.

22.2 Following a break in face-to-face engagement due to Covid restrictions, we are now in a position to reinstate regular consultation activity with service users.

22.3 It is intended that the results of these consultation and engagement exercises will help inform ongoing transformation within temporary accommodation in Highland as well as inform the development of housing options and homeless prevention measures contained within this RRTP.

**23. New Homeless Prevention Duty**

23.1 The Council awaits new guidance from the Scottish Government in relation to the introduction of the new homeless prevention duty and believes this measure will help reduce homelessness through early intervention but has concerns regarding resourcing an expansive homeless duty.

23.2 Until such guidance is issued Highland Council is proactively preparing for the implementation of the new duty. A working group has been established to review the proposals of the duty. The remit of this group is to work in collaboration with other public sector bodies to review existing protocols and design new protocols where required in order to achieve the 'Ask and Act' duty.

- 23.3 Highland believes better collaboration between the Homeless Service and public bodies will help reduce homeless as often the underlying cause of someone's homeless such as drug misuse or family breakdown is best addressed by services other than Homelessness.
- 23.4 The Council currently has a number of discharge protocols in place and this new duty should enhance these working practices.
- 23.5 The duty upon Register Social Landlords (RSL) to issue a Section 11 notice to the Local Authority will be changed under the proposals. Register Social Landlords will be required to do this earlier in the eviction process. The HHR Partners already amended their Section 11 process and RSLs are instructed to issue a Section 11 notice earlier in the eviction process. The consultation did not state when RSLs to issue a Section 11.

## 24. **New Prevention Activity**

24.1 In December 2021, Highland Council was allocated £1,257,000 from the Homelessness and Response Funding Allocation for 2022/23. As part of our service structure review, we have reflected on RRTP activity to date and identified a number of key areas that we would like to develop as a response to our prevention of homelessness approach in the coming year. The action plan at Appendix 4 details all our proposed activities through our RRTP and prevention work. In addition to the activities already detailed in our previous RRTP, we propose to:

- Develop a Complex Client Support Team who will support clients who face the most barriers and challenges.
- Develop a Private Sector Team who will focus on three key areas of activity;
- Empty Homes
- Undertake proactive and reactive case work around empty homes
- Develop opportunities to create PRS through empty homes work in areas where sector is challenging to access
- Private Sector Condition
- Respond to and investigate reported poor housing condition in the PRS /owner occupied sector (including advice, support, and engagement with the sector
- Tenancy Sustainment & Resettlement
- Providing frontline support to tenants and landlords around sustainment of tenancies in the sector, this will include provision of housing support and referrals to welfare, money and debt services, as well as mediation.
- Develop an Employability & Skills Project in partnership with the Council's Employability Team, DWP & Third Sector partners.
- Deliver Trauma Informed Training / Well-being Support for all housing staff and partners commissioned to deliver homelessness services on our behalf. This will include but not be limited to temporary accommodation providers and housing support services.
- Develop a Drug Related Deaths / Non-Fatal Overdose Pathway in collaboration with NHS Highland.
- Explore 'Alternatives to Eviction', this project will consider alternative ways to support tenants who are at risk of losing their tenancy.