



## **Commission on Housing and Wellbeing Consultation 2014**

### **Response from Crisis**

**November 2014**

Crisis welcomes the opportunity to respond to the Commission on Housing and Wellbeing, to reflect on the progress made in Scotland on housing and homelessness and consider future direction of travel.

#### **1. Importance of housing in wellbeing in Scotland**

The importance of housing to wellbeing can be particularly seen with people who are homeless. Being homeless is a traumatic experience, with serious impacts on mental and physical health and general wellbeing.

For people exiting homelessness, having stable accommodation in which to settle is vital. It provides a foundation for planning and making positive life changes. Research by Crisis and Shelter found that people leaving homelessness and entering their own tenancy faced stress, sleeplessness and deepening anxiety over threats to their housing situation<sup>1</sup>. There needs to be a strong emphasis throughout the Commission's work on the importance of a home in providing a stable foundation on which to build many other aspects of life, including employment, health and wellbeing, and the ability to maintain relationships.

Over recent years, addressing homelessness has been a key priority for Scotland. Now that the 2012 commitment to end priority need has been met, it is important to make sure that the focus on ending homelessness in Scotland is not lost.

Crisis would like to see the Scottish Government put a renewed focus on homelessness, with a clear and ambitious strategy for addressing housing needs for those in the most vulnerable housing situations in Scotland.

In addition, consideration of housing issues needs to be mainstreamed across all relevant services, and in particular in economic strategy, and through arrangements to integrate health and social care.

The quality of housing has a real impact on people's health and well being, with poor housing adversely affecting both physical and mental health. A renewed focus on housing in Scotland must address issues of poor standards in the private rented sector.

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<sup>1</sup> Smith, M., Albanese, F., Truder, J. (2014) A roof over my head: the final report of the Sustain project, a longitudinal study of housing outcomes and wellbeing in private rented accommodation. Shelter and Crisis.

## **2. Investment in housing**

Housing supply is not meeting demand in Scotland. Analysis from Audit Scotland suggests that an additional 21,000 new homes are needed each year in Scotland over the next 25 years to meet demand<sup>2</sup>. The Scottish Government has a target of building 6,000 affordable homes a year, including 4,000 social rented homes, while Shelter Scotland estimates that 10,000 new socially rented homes a year are needed to meet homelessness commitments<sup>3</sup>. Supply of new homes fell sharply following the recession, and has only just begun to recover.

Therefore we welcome the focus on supporting new build through national and local targets and more capital investment, and other proposals to increase supply of new housing and improving the quality of existing housing.

## **4. Housing and welfare policy**

Security and stability of housing should be at the heart of welfare policy. Recent changes to the welfare system have increased both the reality and perception of instability of housing for many, through policies such as the bedroom tax, the extension of the shared accommodation rate, increased conditionality, and the uncertainty surrounding the implementation of Universal Credit. Any proposals to radically change the welfare system in relation to housing costs must put stability of housing as central, particularly for the on lowest incomes and in insecure housing situations.

When thinking about shifts in expenditure and creating a single housing budget through devolution of Housing Benefit, it will be important to protect people on low incomes and in more vulnerable housing through any transitions, for example if housing benefit was radically rethought. Crisis opposes proposals to localise capital spend and housing benefit as proposed by IPPR. It would take a long time to bring down housing costs significantly through increasing supply, and there is no guarantee that the money saved on the housing benefit bill would be enough to cover the scale of building required. If money were cut from housing benefit in order to fund new supply, people on low incomes could be left at increased risk of hardship and homelessness. It is also not clear that the most appropriate level for housing planning is local. Regional and sub-regional planning may work better in some situations, for example across the Glasgow region, and there is an argument to be made for an element of national planning as well.

Given the wide disparity in rents between the social and private rented sectors, ignoring tenure in the setting of housing allowance could disadvantage those with higher rents, particularly in those parts of Scotland where private rents are much higher than the average, such as Edinburgh and Aberdeen.

We welcome the opportunity provided through the Smith Commission proposals for Scotland to gain powers to vary the housing costs elements of Universal Credit, including the “bedroom tax”, Local Housing Allowance rates and non-dependent deductions. Along with the bedroom tax, we would also want to see the Shared

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<sup>2</sup> Audit Scotland (2013) Housing In Scotland [http://www.audit-scotland.gov.uk/docs/local/2013/nr\\_130711\\_housing\\_overview.pdf](http://www.audit-scotland.gov.uk/docs/local/2013/nr_130711_housing_overview.pdf)

<sup>3</sup> Shelter Scotland (2014) Briefing for housing supply debate [http://scotland.shelter.org.uk/professional\\_resources/policy\\_library/policy\\_library\\_folder/shelter\\_scotland\\_briefing\\_for\\_housing\\_supply\\_debate](http://scotland.shelter.org.uk/professional_resources/policy_library/policy_library_folder/shelter_scotland_briefing_for_housing_supply_debate)

Accommodation Rate abolished as part of any changes to the way the housing element would operate in Scotland. Local Housing Allowance rates need to be linked to actual rents in local market areas.

Welfare policy does not stand in isolation, and we would also urge consideration of the reasons behind increased spending on housing benefit, such as the links between the number of in-work claimants now receiving housing benefit, the rise of underemployment and wages not rising in line with housing costs, and the shortage of affordable housing.

## **6. Housing, health and education**

We welcome the recognition in the Commission's consultation document of the interaction between health problems and homelessness, and particularly the severe impact homelessness can have on people's health. Rough sleepers have especially poor health outcomes. The average age of death of a homeless person is 47<sup>4</sup>, thirty years younger than the wider population. 73 per cent of homeless people report physical health problems and 80 per cent reported some form of mental health issue<sup>5</sup>.

### ***Rough sleeping***

Crisis strongly welcomes the emphasis in the Commission's consultation on rough sleeping. In 2013/14, 5 per cent (1,787) of applicants slept rough the night before applying for assistance. This varies across Scotland, with particularly high proportions recorded in Edinburgh and West Dunbartonshire, as well as Glasgow and Dundee. This represents a 29 per cent fall between 2010/11 and 2013/14<sup>6</sup>. The fall is likely to be associated with the widening of housing entitlements for people who were previously considered not to be a priority case.

On the other hand, between 2012/13 and 2013/14 there was a small increase in the numbers and proportions of people making homeless applications whose previous circumstances were either long-term roofless or long-term sofa surfing, from 1.9 per cent of all applications to 2.4 per cent of all applications<sup>7</sup>. This is in the context of an overall drop in the number of applications. The numbers involved are small, but it implies that the picture may be more complex than the headline statistics suggest.

Currently the main source of data on rough sleeping across Scotland comes from recording of whether someone was sleeping rough the night before presenting to their local authority as homeless. Glasgow Homelessness Network monitors rough sleeping in Glasgow, and their evidence suggests that in the last year over half of their service users have not presented to the local authority as homeless<sup>8</sup>. Crisis therefore supports the recommendation for rough sleeper counts.

### ***Trends in homelessness***

Since the ending of priority need there has been increased pressure on temporary accommodation, with some people being in temporary accommodation for 12-18

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<sup>4</sup> *Still Dying For A Home*, Crisis (2006)

<sup>5</sup> Homeless Links (2014) *The unhealthy state of homelessness*

<sup>6</sup> Scottish Government (2014b) Operation of the homeless persons legislation in Scotland 2013-14

<sup>7</sup> Scottish Government (2014b) table 3

<sup>8</sup> Glasgow Homelessness Network (2014) Annual homelessness monitoring report: April 2013-March 2014

months at a time. In some cases temporary accommodation can mean little or no access to food storage and cooking facilities, very high accommodation costs which prevent people from entering employment and great uncertainty about where they will be living in the future. There needs to be a strategy in place to reduce the amount of time people spend in temporary accommodation. This will need to start with effective monitoring of trends around temporary accommodation across local authorities through the mandatory collection of HL3 data.

It is concerning that since the beginning of 2012 there has been a rise in the proportion of people presenting as homeless to a local authority who have been assessed as intentionally homeless<sup>9</sup>. While this has fallen over the last six months, it is an issue which needs careful monitoring to ensure that intentionality is not being used as a way of gatekeeping and that all those who should be entitled to housing are able to access it.

### **Prevention**

Much prevention work has been done in recent years in Scotland, particularly with the development of the Housing Options approach, but all services including those which are not primarily housing services need to consider their role in preventing homelessness. We therefore welcome the proposal to strengthen joint working around “pathways” into homelessness.

Following the successful work of the Scottish Government to end priority need, we would like to see the Government place a renewed emphasis on homelessness, including consideration of how all relevant services can work together to prevent people falling into homelessness.

### **8. Private rented sector**

The private rented sector (PRS) can be both a cause of and solution to homelessness. The private rented sector has almost doubled in size over the last ten years, and it now accounts for 12 per cent of the Scottish housing market<sup>10</sup>.

Managing rent increases is vital to ensuring that the private rented sector is an affordable housing option. As a minimum we would like to see a standard tenancy agreement specify no more than one rent increase a year and look at maximum limits on rent increases within a tenancy. Rates of rental increase vary considerably across Scotland and in the longer term further research needs to be done to assess the impact of limiting rent increases on the rental and wider housing market.

Crisis would be concerned if current arrangements for landlord registration and HMO licensing were abandoned in favour of regulation focused on areas and types of landlord known to have problems. While we would strongly welcome a greater focus on problem landlords, it must not be at the cost of poorer standards more generally in the sector.

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<sup>9</sup> Scottish Government (2014a) Operation of the homeless persons legislation in Scotland Quarterly Update 1 April to 30 June 2014, Chart 3A

<sup>10</sup> Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. (2012) The homelessness monitor: 2012. Crisis

Research by Crisis and Shelter tracking housing outcomes for formerly homeless people entering the PRS<sup>11</sup> found that for many participants the condition of their properties got much worse over time, with tenants commenting on how quickly some of these problems appeared after they had moved in. Damp and mould were the most frequent problems, and these often had a negative impact on the health of members of the household, with people reporting new illnesses such as asthma. Other problems included infestations of cockroaches and mice and heating problems, which could cause health risks.

Although this research was undertaken in England, there are extremely poor standards in some parts of the PRS in Scotland. We welcome steps being taken to improve regulation of sector. As well as appropriate national standards being in place, we need to see effective local enforcement to help improve poor quality housing and drive out problem landlords.

Proposals from the Scottish Government for new tenancy arrangements which seek to increase security for tenants are welcome. The details of how this will be implemented will be key to making sure that this objective is met. At the same time, for some people in the PRS one of its advantages is its flexibility and we would not like to see this lost in a drive to improve security for those who want it.

The Commission should also consider ways of making the PRS more accessible to people at the lower end of the income spectrum. Rent Deposit Guarantee Schemes, sharing solutions, housing support options focused on the PRS and pre-tenancy training for tenants can all contribute to the viability of the PRS for this group of tenants. Crisis works with local authorities and third sector organisations to support these different options, and examples such as Fife Keyfund's Deposit Guarantee Scheme show that these can work successfully to support people at risk of homelessness into the PRS.

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<sup>11</sup> Smith, Albanese, Truder (2014) *op cit*



## **About Crisis**

Crisis is the national charity for single homeless people. We are dedicated to ending homelessness by delivering life-changing services and campaigning for change. Our innovative education, employment, housing and well-being services address individual needs and help people to transform their lives.

As well as delivering services, we are determined campaigners, working to prevent people from becoming homeless and advocating solutions informed by research and our direct experience. Crisis has ambitious plans for the future and we are committed to help more people in more places across the UK. We know we won't end homelessness overnight or on our own but we take a lead, collaborate with others and, together, make change happen.

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