



GWSF submission to HARSAG, 16 June 2020

Introduction

GWSF welcomes the opportunity to submit brief comments to the reconvened HARSAG on behalf of our 65 member associations.

We recognise the Group's desire to outline both shorter and longer term actions to improve access to housing as we steadily emerge from lockdown. We would, though, want to note the risks of focusing at this time on a single – albeit critical – aspect of the housing system, and the likelihood of unintended consequences (of recommendations on homelessness) on other parts of the system.

In the very short amount of time available to consider HARSAG's aims, we have focused on a limited number of priority areas. We look forward to making further, more considered input at a later date, as proposals are developed.

Much of our submission focuses on the particular challenges in Glasgow, where we believe the scale of homelessness is greater than anywhere else in the GWSF area.

1 Shorter term challenges

Severe shortfall of social sector supply

The scale of the homelessness crisis created by Covid cannot be overstated. Our members stand ready to continue working with local authorities to prioritise addressing homelessness as voids and relets gradually increase in number as lockdown restrictions are eased. But in Glasgow, between, say, late summer and the end of March 2021, there will be far more households needing settled accommodation than lets available, even accounting for the great majority of lets going to homeless households.

Expectations that almost 100% of lets will be available to address statutory homelessness are understandable, but need to be set against competing demands, for example from existing tenants in urgent need of a transfer because of domestic abuse or other very pressing needs. Other very pressing demands will come from areas such as prisoner release and hospital discharge, on top of the normal accumulation of housing list applications from people in overcrowded or otherwise completely unsuitable housing.

Often such cases are being strongly advocated by local elected members on behalf of constituents. It will be especially important that councillors and MSPs fully

understand the nature and scale of homelessness demand as we emerge from Covid.

As well as creating unrealistic expectations around the proportion of lets available for homelessness, there is a real risk of creating a belief among people in housing need that the only access to social housing in pressured areas such as Glasgow is through the homelessness route. We do not think this is a message Ministers wish to see conveyed now or in the future.

Shorter term augmentation of social sector supply

Whilst there is no single means of increasing social sector supply in the shorter term, a number of measures are being explored in Glasgow, including:

- Greater use of the PRS for shorter term leases of property for use as temporary accommodation, to allow social sector stock to be focused on the provision of settled accommodation
- A more meaningful focus on, and urgency around, 'flipping' temporary accommodation into permanent lets; progress on this has been painfully slow up till now
- A renewed focus on using mainstream housing investment funding to support the acquisition of privately owned flats to increase social sector supply, ensuring that money previously allocated for the completion of new build projects by March 2021 is not lost

Additionally, in Glasgow and elsewhere if need be, consideration should be given to the Scottish Government funding the acquisition and conversion of unused commercial premises where it is feasible to create temporary or even settled accommodation from such premises.

Provision of furniture etc.

The propensity of single households requiring settled accommodation in the coming months will bring into sharp focus the challenges of ensuring people have sufficient furniture and white goods to take up and sustain a tenancy. Any influence HARSAG can have on facilitating the national availability of such provision would be very welcome. In the meantime, the demands on the Scottish Welfare Fund, and the likely delays in securing awards from it, will increase significantly.

Housing First

As always, our member associations will expect to make available lets for use by the Housing First initiative. However, we would urge caution around overstating the role of Housing First in the coming months. Even with a focus on the low hanging fruit of people in hostels and supported accommodation, the past year has seen far fewer households going into HF tenancies than initially heralded.

Any scaling up of HF for people previously rough sleeping will require the commitment of Health and Social Care Partnership resources way beyond the five or six hours of weekly support directly from HF staff.

Refusal rates

Before Covid, the refusal of offers of settled accommodation by homeless applicants was running at around 25% in Glasgow. We recognise that issues around what constitutes a reasonable offer are complex, but the nature and scale of the shortage of accommodation mean that now more than ever, people will need to be supported and encouraged to make realistic decisions about the housing they are offered. Discharge of duty is an issue that has to be addressed and not brushed under the carpet.

Facilitating under occupation of social housing by single households

Currently, and particularly in the wake of the UK Government's imposition of the bedroom tax, the majority of our member associations in Glasgow do not normally permit under occupation of two-bedroom property by single households.

If, in response to the unprecedented demand which will now be faced from predominantly single households, associations are to be encouraged to adopt a more flexible approach, the Scottish Government should guarantee that Discretionary Housing Payments will be available for households newly caught by the bedroom tax. This cannot be left to chance as local authorities balance the range of demands on their limited DHP budgets.

Minimising evictions

Housing associations continue to work intensively to support people struggling to pay their rent. We recognise that Covid has severely affected the income of a substantial minority of tenants, and we know that Covid-related arrears will not put tenancies in jeopardy where people have engaged with us to make Universal Credit claims or take other actions to try to minimise the damage.

For this reason we do not believe further legislation on evictions is necessary, beyond the measures in the first emergency legislation in April. In particular, as we emerge from lockdown we would not wish to see a prohibition on associations acting in cases of serious anti social behaviour where harm and distress are being caused to others. Such cases are relatively rare but can affect a significant number of people and cause distress within communities.

People with no recourse to public funds

HARSAG should avoid making unrealistic demands or raising unrealistic expectations around the capacity to provide accommodation, support and other assistance to asylum seekers who have been told they have no right to remain in the

UK. The very limited powers of the statutory authorities mean that support for this group falls mostly to third sector agencies, and that without significant funding, making increased provision is extremely challenging.

2 Longer term issues

Social housing supply in the future

It is very welcome that the reconvening of HARSAG is further advancing the case for investment in social housing to be at the forefront of Scotland's longer term journey to recovery. We note that HARSAG's recommendations follow the recent publication of research from CIH Scotland, Shelter Scotland and SFHA calling for 53,000 social sector homes to be provided over the five year period 2021-2026.

The fact that a relatively short-lived halt on lets has led to a severe crisis in our short and medium term ability to respond to homelessness needs illustrates how tenuous the housing supply situation is in Scotland, even with the hugely welcome focus on increasing new supply in the last four years.