

EQUAL OPPORTUNITIES COMMITTEE

HAVING AND KEEPING A HOME: STEPS TO PREVENTING HOMELESSNESS AMONG YOUNG PEOPLE – FOLLOW-UP

SOUTH LANARKSHIRE COUNCIL COMMENTS ON SUMMARY OF EVIDENCE RECEIVED TO DATE

SLC welcomes the summary report of the evidence received through the follow up on the 2012 report on Youth Homelessness. We endorse many of the points but would note that in some aspects the evidence inevitably reflects different circumstances and approaches across the country.

We have comments on a number of the points raised, as follows:

Overview and Changes since the Committee's report in 2012

Paras 8 & 11

South Lanarkshire Council agrees that GIRFEC and the new Children and Young People (Scotland) Act offer real opportunities to improve how we tackle youth homelessness. However, for these opportunities to be realised at a national level, it is important to reinforce the role of children's services (traditionally Education, NHS and Social Work) in responding to issues relating to child and youth homelessness, as well as for housing authorities to recognise their responsibilities in relation to children and young people.

2012 Homelessness Commitment

Paras 12 – 19

SLC feels it is unsurprising that there has been some increase in intentionality decisions following the abolition of the priority need hurdle, as where a household was previously deemed non-priority, the intentionality criteria were not considered – now they will be more often considered following an assessment that a household is actually or potentially homeless.

Para 18

SLC notes that any decision on a homelessness application is to some extent subjective, as it is made by an officer based on evidence collected. However, the decision is made based on clear criteria and should be defensible if appropriately made. The comments at para 18 appear to relate to a housing offer (discharge of duty) rather than an intentionality decision. In either case (discharge of duty or decision), the applicant would have a right to review if they felt the council had acted unreasonably or outwith the parameters of their allocations policy.

We also feel it is important to note that the lack of housing supply in many areas does mean that prospective tenants cannot always be offered the house that they

would like in the areas they would prefer. Local allocation policies will differ, but for homeless households, there is a requirement that the offer should be reasonable for the household to live in.

Paras 21 – 23

In line with our comments on paras 8 & 11 (above), we suggest that where young people have support needs, it may be helpful to consider the potential for children's services to assist. Particularly where young people are not ready to live independently, there could be more discussion about care solutions which match their needs/vulnerability/risks rather than moving young people into an adult housing environment that they may be ill equipped to cope with and within which, a housing authority has to manage its landlord functions. We hope that the fine detail of the new Act may assist with this principle.

Housing Options Approach

Paras 24 – 33

SLC agrees that the range of available housing options for young people is limited, and access to the private rented sector is challenging due to a range of factors, including: welfare benefit legislation, landlords' unwillingness to take on young people, lack of sharing options in many areas outside the big cities, limited number of accredited landlords.

In South Lanarkshire, we have found it more challenging to prevent homelessness for young people through a housing options approach than for older age groups; proportionately, the drop in homelessness applications from under 25s is significantly less than for over 25s. However, we are keen to explore ways to change this and have significantly extended our schools programme, taking young homeless people into schools to talk to young people about the challenges of homelessness and looking for more positive ways to leave home. This seems to us to be a useful approach to housing options for younger people.

Paras 34 – 38

SLC feels that the debate on how young people should leave care and move to independent living needs to happen across all agencies, with a shared responsibility in terms of ownership and exploration of a range of suitable accommodation and support options which may or may not include the provision of council housing. In our experience, young people who leave care at an older age, and who are ready to live independently, are far more successfully housed than younger people whose primary need often seems to be for support and care, rather than for independent accommodation.

The Pathways Plan and processes require to be reviewed, improved and link clearly with the new legislation and more emphasis is required on real preparation for the real world of living outwith a care setting.

SLC has begun to explore the use of enhanced housing options approaches for some groups of people, including care leavers, women fleeing domestic abuse, people leaving prison and people with substance misuse problems. Whilst we believe the principle of housing options (individual, person centred approaches to discussing & identifying solutions to housing need) can be universally applied, we do think that some groups of vulnerable people share common issues or concerns in terms of housing, and these can be proactively considered in housing options models.

Para 41

SLC believes that the implementation of the Prevent 1 recording system will ensure appropriate recording and reporting of housing options activity – the joint operation of the Prevent 1 and HL1 should eliminate concerns about under recording of homelessness.

Welfare Reform and Other benefits concerns

Paras 69-72

SLC agrees that young people's opportunity to pursue higher education can be compromised because they cannot meet housing costs. Some of our most disadvantaged young people are then further disadvantaged by being excluded from learning and development opportunities.

We note the suggestion that Discretionary Housing Payments could be used but feel that this would not solve the problem of housing costs for young people in higher education as housing benefit must already be in place in order to be eligible for a DHP. We consider that the issue of supporting vulnerable young people who are forced to live alone to benefit from higher education could be addressed by a review and upgrading of the EMA system which is still in place in Scotland but does not allow for housing costs.

Care Leavers and the Children & Young People (Scotland) Act 2014

Para 87 - 92

In South Lanarkshire, we agree that the most vulnerable care leavers are often those who challenge our service provision the most. Those who are determined to leave care at 16 often have the fewest skills to manage independently and may be more likely to cause harm to themselves, and others; including their neighbours and their property if placed in a tenancy of their own. They are also the young people who are most likely to have negative experiences of relationships, with poor health (including

mental health) and employment outcomes and involvement in offending. We agree that the new Act will not necessarily assist us in dealing with this group but believe we can work together across agencies to ensure that support and care provision can remain in place around the young person. We recognise the need to provide different care solutions for care leavers and particularly for those who challenge our services; we also feel that it would be of great value for young people to be able to return to a care environment if they need and want to do so. However, we are concerned that the ability to provide more appropriate care environments up to age 21 and an option for young people to return to care, will only be realised if it is adequately resourced.

Homelessness prevention

Paras 94 - 95

SLC considers that the prevention of future homelessness should be a priority for all services working with vulnerable young people – at present, it is often seen very much as a housing responsibility.

We also note that whilst we wholeheartedly embrace the principle of corporate parenting, we feel that corporate parenting guidance could be more specific about the roles of particular services in the corporate parenting arena –it may be useful for individual services (health, housing, social work) to spell out exactly what their corporate parenting role means for them in practice. It would also be helpful to have a mechanism by which agencies are required to account for how they fulfil their corporate parenting responsibilities.

Prevention through Education

Para 106 – 107

As already noted, we consider that all services working with children and young people should be aware of and able to respond to the needs of homeless children and young people. This has improved significantly over recent years but the key role in preventing and responding to homeless children and young people often still sits with housing services who may not always be the best placed to engage with young people and children who may be at risk of homelessness.

Use of temporary accommodation

Paras 119 – 122

SLC believes there is some lack of clarity in this section regarding the provision of temporary accommodation for young people, particularly the suggestion that young people should never be placed in temporary accommodation. Councils have a statutory duty to provide temporary accommodation for homeless people and indeed,

it is lack of a suitable range of temporary accommodation resources (including supported accommodation options) which may lead to unsuitable bed and breakfast placements in some cases. Young people themselves are unique in terms of their past, current and future needs and different types of temporary accommodation will work for different people.

However, where a young person's main need is for care and support, it is unlikely that any form of temporary accommodation can meet their needs without significant input from a range of partners. This is particularly the case for young people leaving care who are not yet ready to live independently.

GIRFEC

Para 137

As suggested in our comment on paras 8 & 11, SLC considers that GIRFEC has a very positive role to play in supporting children and young people who are homeless or at risk of homelessness. However, this does rely on children's services accepting that they may have a role in responding to child & youth homelessness.

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