



23 April 2019

By email to

Marion Morris

Homelessness Team – Legislation & Measurement

Scottish Government

Homelessness_External_Mail@gov.scot

Dear Ms Morris

A consultation on local connection and intentionality provisions in homelessness in legislation

Community Justice Scotland (CJS) welcomes the opportunity to respond to the consultation on local connection and intentionality provisions in homelessness legislation.

The scourge of homelessness and the need to tackle it has rightly been identified as a priority for the Scottish Government. The work of the Housing and Rough Sleeping Action Group (HARSAG) and the adoption of the Ending Homelessness Together Action Plan all highlight the efforts that have been made across all sectors to focus on the fundamental need to ensure that people have somewhere safe to live.

For CJS, as public body with a commitment to ensure the effective reintegration into the community of people who have been convicted, including those who have served custodial sentences, access to safe and appropriate housing is a core element of rehabilitation and ultimately to reduce the likelihood of further offending. Ongoing multi-agency working such as the introduction of the SHORE Standards (Sustainable Housing on Release for Everyone) is a step in the right direction towards achieving this but as the recent report by Herriot Watt University published for CRISIS and the Joseph Rowntree Foundation highlights, progress is dependent on and impacted by a much wider set of policy changes. This includes the impact of Welfare Reform, in particular effect of the roll-out of Universal Credit on people's ability to manage their housing costs, as well as on adequate investment in suitable housing provision in the first place. The recent Scotland Homelessness Monitor 2019 shows that 75% of local authorities expect Universal Credit roll-out to increase homelessness.

The proposals in the consultation to loosen the requirement around local connection may make it easier for people to seek housing in an area of their choosing. For some people leaving prison, being able to make a new start in an area not

connected to their old life is often cited as a strategy in preventing them from further offending. It is equally true however that local connection can also be a protective factor for people who require further support on leaving prison.

To be truly effective these measures will need to be adequately resourced, to ensure that suitable accommodation is available in places where people want to live. The consultation notes that the Government will 'monitor the impact on local authorities' to ensure that any 'disproportionate impact' will lead to 'appropriate action should it be proved necessary'. The form that such unspecified 'appropriate action' will take will be critical to the success of this proposed policy change.

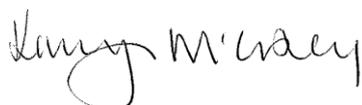
We all know that homelessness blights the lives of the individual person caught up in it, their children, their families and their communities. It also tarnishes Scotland's reputation as a country that looks after its most vulnerable by failing to provide shelter - that most basic of human needs. The result of our common failure across all sectors to support people whose lives are in chaos is sadly highlighted in the recent findings of the research by Health Protection Scotland, Glasgow Caledonian University and NS Greater Glasgow & Clyde. This shows that Glasgow's 10-fold increase in HIV arose from the combination of homelessness and cocaine injecting. Failing to tackle homelessness is a failure not just a matter of housing policy but also of our health, justice, welfare and wider economic policies.

The return to the community from prison is an incredibly high-stakes and potentially fragile process. To successfully integrate, people's needs must be taken into account and support afforded where possible. The measures outlined in the consultation potentially allow for greater local discretion to support people and while they must be viewed in the context of greater effort required across all sectors any support for the suspension of the local connection requirement should not be to the detriment of an individual seeking support by virtue of a local connection.

An unintended consequence of the removal of the local connection criteria may be that housing authorities no longer have a clear incentive to engage with people in prison prior to release, undermining much valuable work ongoing in this area. Also it is not clear what the implications of such a proposal would be for MAPPA. It would also have been helpful for the consultation to have included examples of where current practice may change as a result of the proposals, in particular in relation to intentionality provisions, to avoid and mitigate any unintended negative consequences.

We would be happy to continue a dialogue on these matters.

Yours sincerely



Karyn McCluskey
Chief Executive