



**Scottish Housing
Regulator**

Housing people who are homeless in Glasgow

March 2018

About us

We are the independent regulator of social landlords in Scotland.

Our one **objective is to safeguard and promote the interests of:**

nearly
610,000
tenants
who receive services of social landlords

around
118,000
owners
who receive services of social landlords

around
40,000
people & their families
who may be homeless and seek help from local authorities

over
2,000
Gypsy/Travellers
who can use official sites provided by social landlords

We regulate:

 around
200
Social landlords

 around
160 Registered Social Landlords (RSLs)
 **32** Local Authorities (LAs)

Our **role** is to **monitor, assess and report on** social landlords' performance of housing activities and RSLs' financial well-being and standards of governance. We intervene, where we need to, to protect the interests of tenants and service users. Our **Regulatory Framework** explains how we regulate social landlords. It is available on our website www.scottishhousingregulator.gov.uk



Housing people who are homeless in Glasgow

Summary

This report sets out the findings from our review of how effectively Glasgow City Council and Registered Social Landlords (RSLs) house people who are homeless.

Main findings

- The Council is not housing enough people who are homeless quickly enough. In 2016/17 it housed around half of those it had a duty to house. Some people are housed quickly; this works best when all partners have a clear focus on moving people who are homeless into a home quickly.
- The Council's target of securing 3,000 homes for people who are homeless each year is too low for the number of people it assesses that it has a duty to house. It is not referring enough people to RSLs to meet the level of need from people who are homeless. Many people who are homeless have to wait a long time in temporary accommodation.
- The Council and its partners have made some important improvements to the process they use to find homes for people, and they are working together more effectively.
- The Council aims for a person-centred, needs-led approach to identifying solutions for people who are homeless. This is positive, particularly for people with multiple and complex needs. However, a full and detailed assessment is not necessary for everyone; many people who approach the Council need little help other than getting a home.
- The Council's phased approach to assessing the housing needs of people who are homeless results in duplication of work and unnecessary delay in referring people who are homeless to RSLs.
- The Council loses contact with around a quarter of people who are homeless while they wait for a home. The length and complexity of the process in Glasgow is a significant factor in this.
- Some RSLs in Glasgow are making a good contribution to housing people who are homeless; some could do more. The proportion of available homes let to people who are homeless by RSLs operating in Glasgow ranged from 8% to 47 %.
- Some RSLs in Glasgow refused referrals because the person had former tenant arrears. This is not a good reason to refuse to house a person referred by the Council under section 5 of the Housing (Scotland) Act 2001 and the Council does not always challenge this.

Main recommendations

The Council should:

- set a clear primary objective to move people who are homeless quickly in to settled accommodation.
- review the targets it sets for housing people who are homeless to ensure they are consistent with the number of people it has a duty to secure a home for.
- streamline its approach to assessment and referral, especially for those who need only limited or no assistance beyond getting a home.
- ensure that it keeps in contact with people who are homeless while they wait for a home to help minimise the number of people with whom it loses contact.
- work with RSLs to build its knowledge and understanding of the type and location of homes in the city to ensure that referrals are targeted to appropriate RSLs.

RSLs should:

- always comply with Scottish Ministers' Guidance on providing accommodation to people who are homeless.
- ensure their governing bodies oversee the RSL's performance to assure themselves they are maximising their contribution to housing people who are homeless.

Housing people who are homeless in Glasgow

1. This report sets out the findings from our review of the process in Glasgow, delivered by the City Council and RSLs, to house people who are homeless.
2. This work is one part of our wider engagement with the Council on its homeless service about its failure to discharge its statutory obligations to provide temporary and settled accommodation to significant numbers of people who are homeless.
3. In 2015 the Council and its partners established the Housing Access Board (HAB) to help co-ordinate work to house people who are homeless. The HAB comprises the Council, the Glasgow and West of Scotland Forum of Housing Associations (GWSF), the Wheatley Housing Group (WHG) and the Glasgow Homelessness Network. On 1 April 2016 the HAB introduced a new process for co-ordinating referrals from the Council to RSLs under section 5 of the Housing (Scotland) Act 2001. In 2016/17 the Council secured houses for just under half the people it had a duty to house. This led us to carry out this work to identify how the process was operating across the city.

What we did

4. We examined three broad areas in the process and the work undertaken by:
 - the Council's Community Homeless Teams ('the Council's teams') to assess whether they refer a person to an RSL and what type of housing, and support, the person needs;
 - the Housing Access Team to manage referrals to RSLs;
 - RSLs to offer people homes.
5. We examined the process from the point the Council had assessed the person as homeless to the outcome achieved for the person. We reviewed a sample of homeless households referred by the Council to ten RSLs between October 2016 to March 2017.

We visited: 	The Council's: <ul style="list-style-type: none">• Three Community Homeless Teams• Asylum and Refugee Support Team• Housing Access Team
	10 Registered Social Landlords <ul style="list-style-type: none">> Maryhill> Queen's Cross> Govan> Milnbank> Shettleston>ng Homes>Elderpark>Linthouse>Parkhead>Wheatley Housing Group

We reviewed:



- performance information from the Council's homelessness returns to the Scottish Government and its Annual Return on the Charter (ARC)
- the ten RSLs' ARCs
- performance information produced by the Housing Access Team to help them monitor and manage the referral process

6. We selected a sample of landlords across the three Community Homeless Team areas so we could look at how the process was operating city wide. These RSLs are representative of landlords operating in the city and who have the type of stock most in demand by people who are homeless. We also included the WHG on account of the contribution it makes to housing people who are homeless in the city through its choice based letting approach.
7. In June 2016 the Council introduced a new IT system to support its homelessness service. It continues to build on the range and quality of its performance information.
8. Through our work we found a number of inconsistencies in the data provided and used by the Council and the RSLs. This is something that the Council and its partner RSLs will need to review and improve. Notwithstanding these inconsistencies, the data is adequate to use in our analysis and consistent with our qualitative evidence.

Context and background

9. The scale of the homeless challenge in Glasgow is significant. In 2016/17 the Council:
 - received applications for assistance from 5,377 households
 - had a duty to make an offer of temporary or emergency accommodation to households on 10,350 occasions, but made an offer in only 60% of these
 - owed a duty to secure settled accommodation for 4,195 households
 - secured homes for 2,405 households
 - provided temporary accommodation, at 31 March 2017, to 2,071 households, 143 of these in bed & breakfast accommodation
10. In 2014 the Council reviewed its homelessness services and set an objective to shift from a resource-led approach to a person-centred, needs-led approach. It developed a new Homelessness Strategy for 2015 to 2020. As part of this it integrated the homelessness service with the Glasgow Health and Social Care Partnership. The Council disaggregated the centralised Homeless Persons' Team into three Community Homeless Teams (North West, North East, and South) and the Asylum and Refugee Support Team.

11. The Council's aim is to *"secure an offer of permanent accommodation within a maximum of 26 weeks that turns into a sustainable let which meets the needs of the homeless household and fits into the supply demographic of Glasgow City."*
12. The Council has no houses of its own and so it works with over 60 RSLs in the city to discharge its statutory duty to secure homes for people who are homeless. Some RSLs also lease homes to the Council which it uses to provide temporary accommodation. Co-ordinating and managing the contribution from such a large number of landlords brings challenges. To help it do this, the Council and its partners established the Housing Access Board (HAB) in 2015. The HAB was established to secure more permanent accommodation thereby reducing the use of temporary accommodation, in particular bed and breakfast accommodation. All of the partners on the HAB have a strong commitment to improve the process and achieve good outcomes for people who are homeless in Glasgow.
13. The HAB agreed to introduce a new Housing Access Team (HAT) in 2016 to improve the referral process and partnership working between the Council and the RSLs. It established ten Local Letting Communities (LLCs) across the city to help improve co-ordination of referrals and collaboration at local level. One of the posts in the HAT is currently jointly funded by GWSF and the Scottish Government.

Positive practice



The Housing Access Team consists of staff from the Council and a post part-funded by RSLs in the city. This collaboration is helping the Council and its RSL partners to work together to identify and resolve issues at operational level.

14. The HAT is tasked with developing a *"homelessness capacity planning system that balanced supply and demand in terms of homelessness and wider housing need in each area of the city. The successful operation of the HAT will lead to an increase in supply of settled accommodation for homeless households."* The Council and its partners agreed a new process for referring people to RSLs which began on 1 April 2016.
15. The HAT co-ordinates all referrals to RSLs of people who are homeless. It has weekly dialogue with RSLs to establish how many homes are available for people who are homeless. The HAT also liaises with the Council's teams to ensure an adequate flow of people with appropriate Resettlement Plans for referral to RSLs. The HAT aims to make referrals to RSLs on a daily basis, and as soon as it receives Resettlement Plans. It sends batches of referrals to the WHG daily. The HAT decides which RSLs it will send referrals to using information in Resettlement Plans and the weekly updates from RSLs about available houses.

16. RSLs must, within a reasonable period, comply with a request from the Council to provide accommodation for a person referred to it by the Council under section 5 of the Housing (Scotland) Act 2001, unless it has a good reason for not doing so. Guidance issued by Scottish Ministers sets a reasonable period as six weeks and makes clear that in most cases there would be no good reason for an RSL not to comply with a request made by a council. Scottish Ministers define “good reason” as being unable to make appropriate accommodation available within six weeks or where the only accommodation the RSL has available is of a particular nature, such as sheltered housing for older people, and this is not appropriate for the person who is homeless. So, the grounds for an RSL refusing to house a person referred by a council are very limited. A recent arbitration case in another local authority area reaffirmed this position.
17. Collectively, RSLs that operate solely in Glasgow own and manage more than 96,000 houses. In 2016/17 those RSLs reported that they let just over 8,000 houses in Glasgow. The Council needs to secure around 4,000 of these lets in order to discharge its duty to provide a home to people who are homeless in Glasgow. In 2016/17 the RSLs reported that they let around 2,000 homes to people who were homeless. WHG is the largest provider of social housing in Glasgow, with its subsidiary Glasgow Housing Association (GHA) owning around 40% of social housing in the city. WHG accounted for around 38% of all lets by RSLs in Glasgow in 2016/17, and around 52% of all RSL lets to people who were homeless.
18. There are a number of different approaches that RSLs in Glasgow use to house people who are homeless. Most use a “referral-led” approach, in which they accept a referral and then wait for an appropriate house to become available. Some of the RSLs seek a “stockpile” of referrals from the Council which they then hold until suitable homes become available. The HAT might refer a person who is homeless to several RSLs at the same time to improve their chances of getting an offer quickly. A small number of RSLs use a “void-led” approach, in which the RSL contacts the HAT when a home becomes available to let to have an appropriate household referred to it.
19. WHG operates a choice based letting scheme called HomeFinder. The Council asks people at the Prospects Interview if they want to participate in HomeFinder; and most people do. So the Council refers these people to WHG and, in most cases, to another RSL at the same time. Those participating in HomeFinder have to actively bid for houses that are advertised. However, not all people bid, or engage quickly in bidding. WHG will bid for people if they do not bid within 12 weeks (called “assisted bidding”).

<p>Positive practice</p> 	<p>WHG provides the Council with a daily report on bidding activity to help the Council monitor the progress of referrals and support people to bid. It also provides a range of ways for people to bid and support to help them do so. WHG also provides staff to work with the HAT each week to identify potentially suitable homes based on Resettlement Plans and to bid on behalf of people when necessary.</p>
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Housing people who are homeless in Glasgow

Stage	Timescale
<p>1 Person approaches Council for assistance</p>	
<p>2 Council's Community Homeless Team</p> <ul style="list-style-type: none"> Assesses homeless status and duties owed Assess the "tenancy readiness" Conducts Prospects Interview & produces a Resettlement Plan for each person it has a duty to provide a home for. Send Resettlement Plan to HAT 	<p>within 28 days (Scottish Government Code of Guidance on Homelessness)</p> <p>no target</p> <p>within 28 days of homelessness decision</p> <p>day plan is completed</p>
<p>3 Council's Housing Access Team</p> <ul style="list-style-type: none"> Accepts Resettlement Plan or returns to Community Homeless Team to review Determines which RSL to refer person to Co-ordinates refusals and cancellation of referrals Co-ordinates offers of houses to people who are homeless Records outcomes 	<p>daily</p>
<p>4 RSL</p> <ul style="list-style-type: none"> Accept or reject referral Some RSLs undertake a pre-tenancy interview Make an offer of a home to the person referred 	<p>5 working days (HAB agreed target)</p> <p>No agreed timescale</p> <p>Within 6 weeks (Scottish Ministers' Guidance)</p>



Main findings

20. The Council and its partners have made some important improvements to the process since we first engaged with the Council on its homelessness service, including:
- a strengthening of the commitment of all partners in Glasgow to improving the process and outcomes for people who are homeless;
 - the establishment of the HAB and the HAT to provide a structure to manage and oversee the process of securing homes for people who are homeless;
 - the Council's introduction of a new IT system which provides a tool that is improving, and has the potential to improve further, how it monitors and manages homeless casework;
 - the LLCs which provide a useful forum to build and maintain relationships between the HAT, Community Homeless Teams and RSLs;
 - ongoing performance analysis by the HAT to identify issues and collaboration by partners to find solutions.

Feedback from all of the partners is that the new referral process has improved since it was first introduced and that it has the potential make a significant difference to outcomes for people who are homeless.

21. That said, the pace of change has been slow and not all people who are homeless are getting appropriate outcomes as quickly as possible. There remain a number of significant inefficiencies, bottlenecks and failure points in the system. These result in duplication of effort and generate a significant level of additional work for the Council and its partners. Most importantly, people who are homeless can wait for a long time to get a home and some have lengthy stays in temporary accommodation. The average length of stay for people in temporary furnished accommodation in 2016/17 was 238 days; this has increased to 249 days for the first six months of 2017/18. This prolongs disruption and uncertainty for individuals and families waiting for a home.
22. In 2016/17 the Council assessed that it owed a duty to provide homes for over 4,000 people who were homeless. In the first six months of 2017/18 the Council assessed that it owed a duty to provide homes for 2,051 people who were homeless. It set itself a target to produce a minimum of 3,200 Resettlement Plans each year and the HAB agreed a target of securing 3,000 homes city-wide for people who are homeless each year. The HAT disaggregated this target across RSLs in the LLCs; RSLs agreed individual targets, based on their housing stock profile, turnover of houses and the demand for the areas they operate in.
23. However, these targets are too low to enable the Council to discharge its duty to secure accommodation for all people it assesses that it owes a duty to. While the Council and the HAB was aiming to set what it saw as realistically achievable targets, effectively it is creating a structural backlog in the system.

Recommendation	The Council should set a target for housing people who are homeless which is consistent with the number of people it has a duty to secure homes for.
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24. After assessing that a person is homeless, the Council’s teams decide whether a person is “tenancy ready”, that is they are capable of sustaining a tenancy and so can be referred to an RSL to be housed. The Council does not define ‘tenancy readiness’ or provide clear and consistent guidance for staff on how to assess whether a person is “tenancy ready”. Indeed, we received conflicting messages from the Council on whether “tenancy readiness” should be part of its assessment of people who are homeless. Where it assesses a person as not ready for a tenancy the Council aims to work with the person to become “tenancy ready” and review the case every four weeks. However, not all of the Council’s teams are consistently meeting this target. As a result some people experience delay in being reassessed. We also found that the Council’s case records were not always clear on why a person had not been referred to an RSL. While it is appropriate for the Council to seek to understand the support a person may need to sustain a tenancy, it is unclear on what legal basis the Council requires a person to whom it owes a duty to secure a home for to demonstrate “tenancy readiness” before it moves to discharge that duty.
25. The Council does not actively monitor how long it takes to resolve a person’s homelessness from the point of first contact. We saw that some people were housed within a few weeks of presenting as homeless. This happened where there was a clear focus by all partners on moving them into a home quickly. However, for many others it takes much longer. For people with support needs this was often because the Council had assessed that they were not “tenancy ready”.
26. The Council’s ambition to create a person-centred, needs-led approach to assessing the circumstances of, and identifying solutions for, people who are homeless is positive. This is particularly relevant for people who have multiple and complex needs. However, a full and detailed assessment is not necessary in all cases; many people who approach the Council need little assistance other than help in getting a home. The Council needs to consider its assessment process with this in mind.

Recommendation	<p>The Council should:</p> <ul style="list-style-type: none"> • set a clear primary objective to move people who are homeless quickly in to settled accommodation. • review the appropriateness of its “tenancy ready” assessments. • streamline its approach to assessment and referral for those who need only limited or no assistance beyond getting a home.
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27. When the Council has decided that a person is “tenancy ready”, a caseworker from the relevant Community Homeless Team carries out a Prospects Interview with the person and produces a Resettlement Plan for each person or family that it must secure a home for.
28. At the Prospects Interview the Council’s teams gather information about the household, previous tenancies, former tenant arrears and repayment arrangements, medical information, housing requirements and the areas where the person wishes to live. The Council’s caseworkers advise the person about the Council’s policy of making one reasonable offer of housing, and other information relevant to starting a tenancy, such as RSLs’ approach to requiring the payment of rent in advance at the start of a tenancy. The Council also finds out if the person wishes to be referred to HomeFinder, explains how it works, what is expected of the person and what action the Council will take on their behalf if the person does not bid for houses.
29. The Council uses the information from the Prospects Interview to produce a Resettlement Plan containing the household details, the housing need, ongoing support needs and details of support being provided. The Council uses the Resettlement Plan as the basis for referring the person who is homeless to an RSL. It does not give people who are homeless a copy of their Resettlement Plan. The Council has improved the quality of the Resettlement Plans it is producing. However, we found a number of Resettlement Plans returned to the Council’s teams by the HAT because of errors or missing information, creating a level of duplicated effort and delay. We also found that some Resettlement Plans contained sensitive personal information that was not necessary for, or relevant to, the housing of the person who was homeless.
30. The Council has set targets for the timescales for the completion of Prospects Interviews and Resettlement Plans, and also for the numbers of plans produced. However not all its teams are aware of these targets or meet them.

31. The Council's phased approach to assessment – firstly an assessment of the person's homelessness, then whether they are "tenancy ready", followed by a Prospects Interview, and finally the production of Resettlement Plans – results in duplication of work and unnecessary delay in referring people who are homeless to RSLs.

Recommendation	<p>The Council should:</p> <ul style="list-style-type: none"> • streamline and combine the work involved in homeless assessments, Prospects Interviews and the production of Resettlement Plans to ensure that the information necessary for a referral is gathered at the earliest opportunity. • set, communicate and monitor clear targets for timescales on completing assessments of people who are homeless, and use these to manage effectively performance in its teams and across the Council. • ensure that a Resettlement Plan contains only that information which is necessary to secure the person an appropriate home. • provide people who are homeless with a copy of their Resettlement Plan.
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32. The efficient, consistent and sustained throughput of Resettlement Plans by the Council's teams is crucial to the effective functioning of the process. In 2016/17 the Council reported that it completed nearly 3,400 Resettlement Plans, 200 more than its annual target. However, this figure included a substantial backlog of around 800 live referrals from the previous year; in 2016/17 the Council produced 2,557 new Resettlement Plans. As we note at paragraph 9, this is substantially below the 4,195 households the Council assessed in 2016/17 as needing a home. In the period 1 April to 30 September 2017 the Council completed 1,539 Plans against a target of around 1,600. The Council is not completing a sufficient number of Resettlement Plans to enable it to house every person it assesses as needing a home.

Recommendation	<p>The Council should set targets for the production of Resettlement Plans that relate to the number of people it needs to secure a home for, and ensure that its process and resources are adequate to deliver the targets.</p>
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33. The HAT's ability to make referrals to RSLs is determined by the number and quality of Resettlement Plans provided to it by the Council's teams. Generally, the HAT refers people to RSLs quickly when it has received an acceptable Resettlement Plan. In 2016/17 the Council made 5,113 referrals to RSLs, including multiple referrals of the same person. In the first six months of 2017/18 it made 2,507 referrals to RSLs. However, taking account of the level of multiple referrals in these figures, the Council is not referring enough people to RSLs to meet the level of need from people who are homeless.

34. Accurate information in Resettlement Plans about where people want to live is critical for effective referrals, targeted to appropriate RSLs. We saw that the Council's teams did not always have a good understanding about the areas RSLs operate in, contributing to inaccurate information in Resettlement Plans, inappropriate referrals and refused offers. The Council has recognised that it needs to improve knowledge and understanding of local areas and RSLs' housing to help improve the quality of information in Resettlement Plans and the effectiveness of referrals.

<p>Positive practice</p> 	<ul style="list-style-type: none"> • The HAT produced profiles of RSLs in the city including house type, location, services and local amenities to help the Council's teams have informed discussions with people during the Prospects Interview about options which might meet their needs. • The Council's teams met with eight of the RSLs we visited to improve staff knowledge about the homes and services the RSLs provide. This included taking part in stock tours.
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35. We found that some referrals had been returned by RSLs, and offers refused by people who were homeless, due to incomplete information in Resettlement Plans about health conditions affecting the type of property the person required, or because there has been a change in the person's circumstances and the Council had not updated the Resettlement Plan, or the RSL could not contact the person who was homeless. The HAT told us that it is working to understand the causes of this "defective demand" by analysing information it has collected since it was established. It intends to use this analysis to agree new letting targets for RSLs for 2018/19.

<p>Recommendation</p>	<p>The Council should:</p> <ul style="list-style-type: none"> • build on the analytical work being done by the HAT to better understand and remove failure points in the referral process. • ensure that all its staff have up to date knowledge of the RSLs operating in their areas and the areas where homes are available.
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36. The Council loses contact with a significant number of people who are homeless during the process to secure them a home. During 2016/17, the Council reported that (after it completed its homeless assessment) it did not know the outcome for, or lost contact with, 1,110 households or 21% of all applications it received; the Scotland-wide figure for an outcome of lost contact or unknown outcome was 17% in 2016/17. A range of factors can lead to a person losing contact, some of which are beyond the control of the Council. However, we found that the length and complexity of the process in Glasgow is a significant factor in lost contacts. The Council allocates a named caseworker to each person who is homeless, but only until it passes the Resettlement Plan to the HAT.

<p>Recommendation</p>	<p>The Council should ensure that it keeps in contact with people who are homeless while they wait for a home to help minimise the number of people with whom it loses contact.</p>
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37. The Council and RSLs agreed that on receipt of a referral from the HAT an RSL should accept or reject the referral within five working days. Not all RSLs acknowledge receipt or tell the HAT whether they are accepting or rejecting the referral. This creates uncertainty and unnecessary work for the HAT and can cause delays in progressing referrals to other RSLs.

Recommendation	RSLs should always comply with the timescale for informing the HAT whether they are accepting or rejecting a referral.
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38. During the first half of 2017/18 RSLs in Glasgow refused around 350, or 14%, of the 2,507 referrals sent to them. The main reason for refusals between July and September 2017 was RSLs not having houses of the size required available within a reasonable period.

39. During the period July to September 2017, RSLs in Glasgow refused 34 referrals because the person referred by the Council had former tenant arrears. We found that four of the RSLs we visited had refused to accept referrals for this reason. This is not a good reason to refuse to house a person referred by the Council under section 5. The Council does not always challenge RSLs about this practice.

Recommendation	RSLs must always comply with Scottish Ministers' Guidance on good reason. The Council should challenge RSLs who refuse to accept referrals because of former tenant arrears.
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40. Nine of the RSLs we visited carry out interviews with people referred by the Council before they make an offer in the same way as they do for housing list applicants. These interviews can help both the RSL and the person who is homeless to identify the most suitable home which will meet the person's needs. The purpose of these interviews was not always clear and RSLs have a variety of practice around what they are called, the format, and timescale for the interview; one RSL called it a 'Housing Options interview'. We saw that these interviews can cause confusion amongst people referred to RSLs under section 5 and can contribute to delays in finding them a home. Not all RSLs always inform the HAT and the Council's teams when a pre-tenancy interview is happening, meaning that support workers are not always present to assist the person who is homeless where appropriate or necessary.

Recommendation	The Council and RSLs should agree the purpose and timescale for pre-tenancy interviews to assist people who are homeless to move into a home quickly.
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Positive practice 	Govan Housing Association introduced pre-tenancy interviews for people on its housing list and people who are homeless to provide them with a range of information, including accessing financial assistance, services / amenities within the area and the provision by the association of essential home starter items. Through this Govan aims to maximise people's housing opportunities and improve tenancy sustainment.
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41. Most RSLs operating in Glasgow ask people who are becoming a tenant to pay one month's rent in advance at the start of a tenancy. We found that the RSLs we visited adopted a flexible approach to rent in advance for people who are homeless, and we saw only a small number of instances when a person refused an offer because he or she could not pay rent in advance. However, we saw some cases where the Council had to negotiate a flexible approach with RSLs, resulting in unnecessary delays in securing a home for the person who was homeless. We also found that not all of the RSLs always communicated this flexibility to the person; we saw letters sent by an RSL to people inviting them to attend an interview which made clear that the person's financial circumstances would be assessed prior to an offer being made and that no offer would be made if the person did not attend. Section 20 of the Housing (Scotland) Act 1987 provides that no discrimination should take place in the allocation of housing with reference to the "income of the applicant and his family". Scottish Ministers' Guidance is clear that a person's ability to pay rent in advance does not constitute a good reason for refusing a referral. The recent arbitration referred to in paragraph 16 confirmed that the requirements of section 5 take precedence over an RSL's policy in relation to rent in advance.

Recommendation	<ul style="list-style-type: none"> • RSLs must always comply with Scottish Ministers' Guidance on "good reason". The Council should challenge RSLs who refuse to accept referrals because a person who is homeless cannot pay rent in advance of starting a tenancy. • RSLs and the Council should agree an approach to requiring people to pay rent in advance at the start of a tenancy for people who are homeless that ensures clarity for the person who is homeless and minimises the potential for delay.
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42. An RSL will notify the HAT when it decides to make an offer to a person referred to it by the Council. The RSL will keep an offer available to the person for three days (four days if an interpreter is required by the person who is homeless). The Council and RSLs have recently agreed that RSLs will keep an offer available for a further two days where the person who is homeless has refused the offer. This to allow the Council's teams an opportunity to discuss with the person whether it is a reasonable offer, and if so, the potential implications of refusing the offer. This is a positive development and may help to reduce the number of refused offers.

43. In 2016/17 RSLs made 2,843 offers of lets to people who were homeless. People who were homeless refused around 597, or 21%, of these offers. In the first half of 2017/18, RSLs made 1,515 offers; however, 417, or around 28%, were refused. The main reason for people refusing offers was that the person wanted to live in another area. This “defective demand” highlights the importance of the discussion at the Prospects Interview about where the person wants to live, what RSLs operating in those areas can offer and other alternative options which could meet the needs of the person who is homeless. The HAT intends to do further work to analyse the reasons for the high numbers of refused offers.

Positive practice 	During 2016/17 Parkhead Housing Association provided one third of its newly built houses to people who were homeless and referred by the Council. This is its policy.
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44. We saw many examples where the RSLs we visited housed people referred to them quickly, within two to three weeks in some cases. This worked best where all partners had a clear focus on moving people into a home quickly. Analysis by the HAT of referrals made from June 2016 to March 2017 showed that, city-wide, the median average is seven weeks to let a home from the date the referral is received by an RSL. Within this, those RSLs not participating in HomeFinder take an average of around four weeks to let a home.

45. There is much in WHG’s HomeFinder that is positive for people who are homeless. People who are homeless can exercise a degree of choice that may not be available in other approaches, and evidence suggests that it results in high levels of tenancy sustainment. WHG provides information and support to help people bid for homes. However, it takes an average of ten weeks to secure a home. We are aware WHG and the Council are exploring ways to streamline the joint approach to supporting people to bid effectively and within six weeks.

Recommendation	RSLs must always comply with Scottish Ministers’ Guidance and provide accommodation within six weeks.
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Positive practice 	Govan Housing Association, Maryhill Housing Association and the WHG converted the leases of temporary furnished flats into Scottish Secure Tenancies where the person who was homeless had been residing there for a long time and wanted to continue living there. This approach helped to prevent any further disruption to those families.
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46. The Council's duty to secure a home for a person who is homeless is fulfilled by a single offer of housing, even if this is refused by a homeless person, providing the offer is a reasonable one. The Council's policy is that it will discharge this duty after it determines it has made a reasonable offer. The Council does not consistently apply its policy. In some cases where it had discharged its duty, it permitted people to continue to occupy temporary accommodation for significant periods of time. This is contributing to pressure around the availability of temporary accommodation. The Council has recently started monitoring performance on numbers of cases where it discharges its duty.

Recommendation	The Council should consistently apply its policy on when it has discharged its duty to secure a home. It should regularly monitor and review how it is applying the policy to help it maximise the availability of temporary accommodation.
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47. RSLs in Glasgow are making a good contribution to house people who are homeless, but not all are. In 2016/17, the proportion of their available homes let by RSLs to people who were homeless ranged from 8% to 47%. The conversion rate of lets from referrals ranged from one let from every referral to one let from every nine referrals. We found a range of factors contributed to this variation, including some of the problems we identify above around the production and throughput of Resettlement Plans, the system of multiple referrals and the level of abortive referrals. These combine to present challenges for some RSLs to achieve the lettings targets agreed with the Council. That said, we saw that some RSLs were more proactive than others in engaging with the Council to get more referrals and house people quickly.
48. Eight of the RSLs we visited report on their performance against their agreed target to the RSL governing body. This is important to help governing bodies assure themselves that their RSL is maximising its contribution to housing people who are homeless.

Recommendation	A RSL governing body should have oversight of the RSL's performance against agreed targets, and assure itself that it is maximising the RSL's contribution to housing people who are homeless.
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Next steps

49. We now expect the Council and its partners in the HAB to respond positively to our findings and recommendations. We now expect the Council to provide us with an action plan within six weeks on how it will address our recommendations and improve the services it provides for people who are homeless.
50. We will engage with individual RSLs as required in relation to their performance in housing people who are homeless. We expect all RSLs in Glasgow to have regard to our recommendations.

Terms we use in this report

Annual Return on the Charter	Each year all social landlords must provide us with information about their performance in delivering services to tenants and other service users. This includes information about the numbers of lets it makes to people who are homeless, and for local authorities information on the temporary accommodation they provide.
Arbitration	The process to be used where there is disagreement between a council and an RSL on whether the RSL's reason for not providing accommodation is a "good reason" as defined in section 5 of the Housing (Scotland) Act 2001.
Choice based letting	An approach whereby available properties are advertised on a weekly basis and prospective tenants bid on the properties.
Discharge duty	The process whereby a council's statutory duty ends after it has made a reasonable offer of a home to a person who is homeless.
Duty to provide temporary and settled accommodation	Under the Housing (Scotland) Act 1987 local authorities must provide temporary accommodation and a more permanent home for people who are homeless in certain circumstances.
Good reason	A RSL must, within a reasonable period, comply with a request from a local authority to provide accommodation for a person referred to it by the Council under section 5 of the Housing (Scotland) Act 2001, unless it has a good reason for not doing so. Scottish Ministers define "good reason" as being unable to make appropriate accommodation available within six weeks or where the only accommodation the RSL has available is of a particular nature, such as sheltered housing for older people, and this is not appropriate for the person who is homeless.
Homeless assessment	Under section 28 of the Housing (Scotland) Act 1987 local authorities must make such inquiries as are necessary, if they have reason to believe that a person is homeless, or is threatened with homelessness, to satisfy themselves whether the person is homeless or threatened with homelessness. This is sometimes called "the homelessness decision."
Homelessness returns	The range of information local authorities gives the Scottish Government about the performance of their homeless services and the people using it.
Housing need	In this context, an assessment of the home a person requires to help them sustain a tenancy, taking account of their preference about location, type and size of property, health and other social care needs, the services required from the landlord, and affordability.
Housing list applicants	A list of applicants for housing that is used by landlords to allocate homes.
Local Letting Communities	In Glasgow, the Council and RSLs have established ten local forums based on geographical location.
Prospects Interview	A stage in the Council's process where a caseworker meets, or has a discussion with, the person who is homeless to gather information about them and their housing need.
Reasonable offer	In considering what is a reasonable offer, local authorities should take into account the particular circumstances and

	needs of the person who is homeless. They should also take into account the sustainability of the accommodation for that particular person. (Source: Code of Guidance on Homelessness, 2005)
Reasonable period	Scottish Ministers define reasonable period as six weeks.
Rent in advance	The policy of some RSLs of requiring a prospective tenant to pay one month's rent in advance at the start of a tenancy.
Resettlement Plan	A document which the Council's caseworkers produce after a Prospects Interview. It contains relevant information about the person and their housing need.
Section 5 referral	Where, under section 5 of the Housing (Scotland) Act 2001, a local authority can request a RSL that has accommodation in its area to provide accommodation to people who are homeless
Statutory duties	Legal requirements which the Council and RSLs must fulfil.

Sources

Annual Returns on the Charter, 2016/17

Code of Guidance on Homelessness, Scottish Government (2005)

Housing (Scotland) Act 2001, Section 5: Guidance on Good Reason, Scottish Executive, 2002.

Homelessness in Scotland: 2016/17, Scottish Government

Homelessness in Scotland: up to 30 September 2017, Scottish Government

Housing (Scotland) Act 1987

Housing (Scotland) Act 2001

Quarterly performance reports by Glasgow Health and Social Care Partnership:
Homelessness Services and the Housing Access Team 2016/17 to Quarter 2: 2017/18



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