Rapid Rehousing Transition Plan

Version 2

2022/3 to 2026/7

5/8/2022

Contents

1. Introduction

The Homelessness and Rough Sleeping Action Group (HARSAG) was set up by Scottish Government in October 2017 to produce short and long-term solutions to end homelessness and rough sleeping. Led by best evidence, the cornerstone of recommendations was a transition to a Rapid Rehousing approach of which Housing First forms a smaller component.

Rapid rehousing requires all local authorities in Scotland to take a housing led approach for rehousing people that have experienced homelessness, making sure they reach a settled housing option as quickly as possible rather than staying for a period in temporary accommodation. The ultimate aim is to eliminate homelessness where possible and to ensure that, for anyone experiencing homelessness, it is speedily resolved.

Where homelessness cannot be prevented, Rapid Rehousing means:

- A settled, mainstream housing outcome as quickly as possible in an area where the applicant chooses to live;
- Time spent in any form of temporary accommodation is reduced to an absolute minimum, with the fewer transitions the better;
- When temporary accommodation is needed, the optimum type is mainstream, furnished and within a community.

For people with multiple needs beyond housing:

- Housing First is the first response for people with complex needs and facing multiple disadvantages;

When HARSAG was created, each local authority was given access to a sub group, or Hub, and tasked with developing its own Rapid Rehousing Transition Plan (RRTP). The Hubs were provided with support from Scottish Government and continue to meet regularly to share experiences and good working practices.

When the pandemic occurred, the Scottish Government asked HARSAG to reconvene in June 2020 to ensure arrangements were in place so everyone had somewhere suitable to sleep where they could socially distance and to remove rough sleepers from the streets. The Local Housing Allowance was increased (and remains at its increased level) to enable easier access to private rented properties (which normally have higher rents than social housing), and evictions which would have led to homelessness, were prohibited. In addition, the ban on using unsuitable accommodation was moved forward from April 2021 to October 2020. This sent out a strong signal that Bed and Breakfast accommodation and hotels were not to be seen as a replacement for a safe and stable home.

Moray Council wrote its original Rapid Rehousing Transition Plan in 2019 without any indication of what funding may be made available by the Scottish Government. Once funding levels were announced, (at around 20% of what was bid) it became clear that Moray Council could not adopt its original plan in its entirety. The onset of the Covid 19 pandemic in March 2020, which saw a significant period where the letting of housing was paused and the demand for temporary accommodation increased, further added to the difficulties faced in progressing the RRTP as originally planned. In common with other local authorities, it has also proved challenging to recruit suitable staff for the roles. Although some progress has been made, the original RRTP has now been updated to better reflect current circumstances and provides an update for year 1 of the plan. Statistics on homeless applications, outcomes, use of temporary accommodation, etc have been taken from 2021/22 data.

The Council has considered how it can transform current service provision over the next 4 years to reduce homelessness in Moray. It has also updated the resources that will be required to make the transformational change whilst taking into account the financial limitations. The Council has looked at how it can minimise costs by making homelessness a "corporate" responsibility rather than simply a "housing" problem. Further discussions with other council services, agencies, housing associations, third sector partners and service users will help shape future services with the aim of preventing homelessness where possible.

The RRTP will be subject to changes of legislation over the four year period and these will be incorporated into the RRTP where required. Following a consultation by Scottish Government earlier this year, one of the initial changes is expected to be a greater involvement from other statutory agencies to 'ask and act' to ensure they have a responsibility to play a role in the prevention of homelessness. This would include police, GP's, medical staff, etc being required to ask anyone presenting to them of their housing status and reporting these outcomes to the local authority housing department. This will allow advice and action to be taken sooner than is currently the case and ultimately be less traumatic for those concerned. If this is implemented, it will mean increased contact with other agencies and an increase in the number of referrals to housing staff. This will have financial and staffing implications. Meantime, the Scottish Government is expected to confirm the outcome of the consultation within weeks.

The transformational change set out in this RRTP will cover the period 2022/23 to 2026/27.

2.   Links to other Strategies and Plans

The graphic below illustrates the linkages between strategic approaches relating to rapid rehousing and Housing First, covering allocation policy priorities, approaches to increasing supply including new build, and care and support services.

This Plan is one of a suite of strategic documents which make up the Local Housing Strategy which is reviewed annually as part of the Strategic Housing Investment Plan (SHIP) process. The RRTP will also influence Health and Social Care Moray's Strategic Commissioning Plan and associated Housing Contribution Statement.
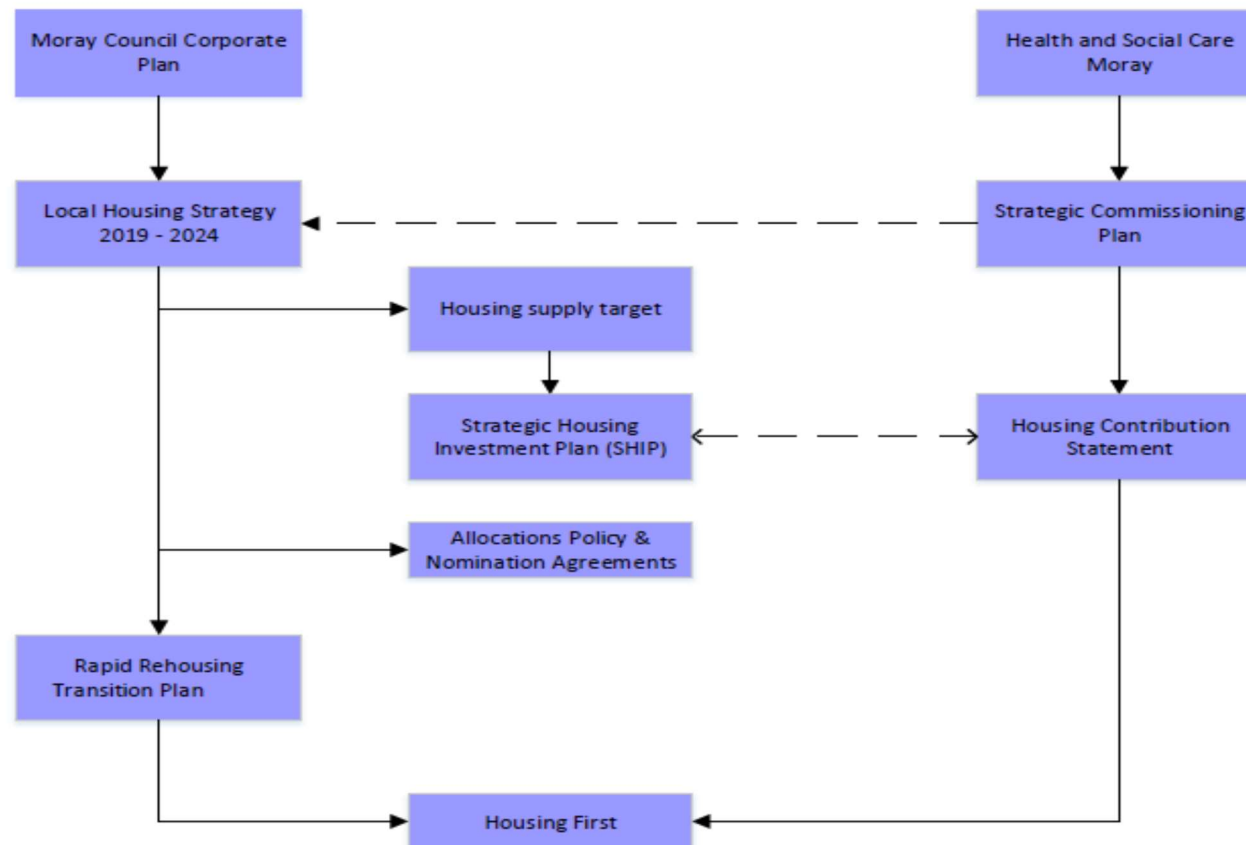
A number of legislative changes have already taken place, or are expected to take place, since the RRTP was first written. These include:

➢ **Homelessness etc (Scotland) Act 2003 (Commencement No.4) Order 2019**
Intentionality – Whilst this was a duty to be carried out as part of the assessment process, since 7 November 2019 it has been amended to a 'discretionary power'. This means that there is no longer a requirement for the local authority to consider intentionality when reaching a conclusion on homelessness priority. However, the local authority is still required to find solutions to the homeless situation regardless of intentionality.

Removal of Local Connection – The duty to carry out an assessment for a Local Connection was also due to be removed in May 2021 but was postponed due to the pandemic. Currently, where an applicant has a connection with another local authority rather than Moray, they would generally be referred back to that local authority for permanent housing, unless they were a subject of domestic abuse. This also applies to applicants in other areas who can be referred back to Moray. When the change is enacted, this will no longer be the case. This means that anyone can present themselves as homeless in Moray and seek permanent rehousing. This applies to all Scottish local authorities and could impact the number of applications received in high demand areas throughout Scotland. Currently, Scottish Government has said it is committed to the introduction of the change which requires a Scottish Statutory Instrument to be laid before Parliament. Due to the potential impact of the Ukrainian refugee settlement programme and availability of temporary accommodation, no date for this has been set for when this change will now take place.

➢ **Extension of the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2004** -Following consultation, the Scottish Government agreed to make amendments to the Unsuitable Accommodation Order by extending it to include all categories of homeless applicants. This means that anyone staying in temporary homeless accommodation for more than 7 days which is deemed unsuitable for the applicants' needs, will result in a breach of the Order. Due to the pandemic, the Order was brought forward and become effective in May 2020, which was a full 12 months before originally planned. In recent years, Moray Council have been pro-actively aiming to provide more suitable temporary accommodation and reduce the dependency on Bed and Breakfast and hostel type accommodation. Although this is better for the applicant, it has put additional pressure on Moray Council to find alternative accommodation types.

> **Duty to Prevent Homelessness**
In October 2019, the Scottish Government announced a Prevention Review Group consisting of experts and key partners, supported by Crisis, that were to consider options for introducing legislation ensuring all public bodies work together to prevent homelessness. This group came up with proposals which have been subject to wider consultation earlier this year. The result of that consultation is expected to be published during late summer/autumn 2022. If accepted, it will signify a change, in that homelessness will become a responsibility for all public bodies rather than just housing. It could also mean additional workloads for local authority housing departments. One of the proposed changes is that people will be considered at risk of homelessness if their accommodation is at risk within a 6 month period. Currently only 2 months is the catalyst. Scottish Government has recognised that this could mean additional costs for local authorities and it is understood that a funding package will be considered once the outcome is known.

3.   Moray's Housing Market

There are approximately 43,000 households in Moray and this is expected to increase to 47,700 households by 2037. In common with many other parts of Scotland, Moray is projected to have an increasing proportion of smaller households over this period.

The Housing Need and Demand Assessment (HNDA) is due for review during 2022/23. The current HNDA of 2017 was appraised as "robust and credible" by the Centre for Housing Market Analysis on 17 April 2018. The HNDA findings were broadly consistent with those of the previous HNDA 2011, in that there is an acute shortage of affordable housing in Moray. The 2017 HNDA found that 2,120 new housing units were required during 2018/19 to 2023/24 to meet need (424 per year), and of those **56%** should be provided as "affordable housing". New build affordable housing completions for Moray Council and RSL's between 2018/19 and 2021/22 was 351. (2018/19 68 units, 2019/20 72 units, 2020/21 102 and 2021/22 109 units). Although below what is required, each year demonstrates an increase of new builds from the previous year.

The Council is the biggest social landlord in Moray, with 6297 properties. Local Housing Associations own around 2799 properties. Together this housing stock generates around 600   vacancies per year. Moray has proportionally fewer social rented properties (19%) and a smaller private rented sector (11%) than the Scottish average.

At 31 March 2022, there were 3472 households registered on the Council's housing list, and on average there were 6.9 applicants for every vacancy. This ratio varies widely across house sizes. The greatest pressure is on 4 bedroom properties (69:1) and on 1 bed general needs (27:1). There is considerably less pressure on 2 bed general needs properties (4:1). At any given time, Moray Council has approximately **100 – 130** statutorily homeless households waiting to be permanently rehoused.

4.   Homelessness Context

Homelessness in Moray
Table 1 shows that, apart from 2020/21, homelessness has continued at comparable levels since 2017/18. The pandemic may have played a part in 2020/21 as people had to remain in their current accommodation.

Table 1	2017/18	2018/19	2019/20	2020/21	2021/22
Homeless Assessments completed	537	572	528	455	507

Source: HL1 data

Table 2 provides the reasons for the differences in applications:

Table 2	2017/18		2018/19		2019/20		2020/21		2021/22	
	Number	%	Number	%	Number	%	Number	%	Number	%
Termination of tenancy/ mortgage due to arrears	33	6.1	34	6	19	3.6	11	2.4	25	4.9
Other action by landlord resulting in termination	41	7.6	50	8.7	53	10	20	4.4	44	8.7
Applicant terminated secure accommodation	7	1.3	13	2.3	15	2.8	11	2.4	19	3.7
Loss of tied/service accommodation	6	1.1	8	1.4	4	0.8	2	0.4	4	0.8
Discharge from prison/hospital/care/other	29	5.4	27	4.7	23	4.4	17	3.7	12	2.4
Emergency (fire, flood, storm, closing order)	17	3.2	6	1	17	3.2	8	1.8	9	1.8
Forced division/sale of matrimonial home	5	1	14	2.4	3	0.6	6	1.3	8	1.6

Other reason for loss of accommodation	0	0	5	0.9	4	0.7	4	0.9	3	0.6
Dispute within household (violent or abusive)	64	12	62	10.9	66	12.5	88	19.3	71	14
Dispute within household (non-violent or abusive)	68	12.6	82	14.3	75	14.2	72	15.8	53	10.4
Fleeing non-domestic violence	7	1.3	9	1.6	8	1.5	10	2.2	7	1.4
Harassment	15	2.8	11	2	7	1.3	5	1.1	17	3.4
Overcrowding	14	2.6	21	3.7	30	5.7	8	1.8	5	1
Asked to leave	208	38.7	192	33.5	173	32.8	175	38.5	155	30.5
Other reason for leaving accommodation/household	23	4.3	38	6.6	31	5.9	18	4	75	14.8
Total	**537**	**100**	**572**	**100**	**528**	**100**	**455**	**100**	**507**	**100**

Source: HL1 data

Moray performs well in reaching decisions on homeless applications within 28 days, i.e. the benchmark set by the Code of Guidance on Homelessness 2005. During the most recent 5 years, 98.2% of all cases were assessed within 28 days. Table 1 provides details of performance.

Table 3	**2017/18**		**2018/19**		**2019/20**		**2020/21**		**2021/22**	
Statutory Decisions	No	%	No	%	No	%	No	%	No	%
Under 28 days	518	96.46	557	98.24	530	99.62	449	98.68	500	98.43
Over 28 days	19	3.54	10	1.76	2	0.38	6	1.32	8	1.57
Total	537	100	567	100	532	100	455	100	508	100

Source: HL1 data

ABOVE INCLUDES THOSE WHO WITHDREW APPLICATION< LOST CONTACT< ETC

The number of Housing Options interviews during 2020/21 decreased to **802,** from the average **1051** over the preceding 3 years. Perhaps unsurprisingly, the number of interviews which progressed to a homeless application also fell during 2020/21 to **455** from an average of **545** over the same 3 year period. This coincided with the start of the pandemic when people were required to stay

indoors. Smaller reductions were also experienced during 2021/22 although the numbers have almost returned to pre-pandemic levels.

The Scottish statistics for 2020/21 confirm the following:

- The group most likely to become homeless are aged 18 to 49 (85%) although that age group in the general population accounts for only 50%;
- The majority of applicants are increasingly single person households (68%) of which males account for 58%;
- The main reason for homelessness is being "asked to leave" (30% for males, 22% female);
- This is followed by a "non-violent dispute within the household" (25% of males and 19% females) although there is an increasing trend towards violence in relationships being a cause (6% males and 26% female)
- Moray recorded a very low number of rough sleepers;
- The vast majority of homeless households (93%) have a local connection to the local authority to which they apply;
- Applicants with no connection to any local authority (5%) are required to be housed within the authority to which they have applied;
- Local connection is mainly associated with residency and family association;
- Approximately 60% of presentations were found to be statutorily "homeless/ potentially homeless unintentional"; and
- Repeat homelessness in Scotland was only 5% during 2020/21 which was down from 15% in previous years. Moray had 3.9% in both 2020/21 and 2021/22 which was generally lower than the Scottish average.

The characteristics of homeless households have remained consistent in recent years with a **high proportion of single person households** compared to families. The higher proportion of single person households is significant in relation to demand for temporary and permanent accommodation, particularly **1 bed properties**. The age range of applicants has also remained consistent with over half aged 26 to 59 and around one third aged 18 to 25.

Table 4 below, provides an analysis of homeless decisions from 2017/18 to 2021/22. It demonstrates that during this period, with the exception of 2020/21, that numbers of homeless applications are consistent, varying only by 10% across the period.

Table 4					
Homeless Decisions	**2017/18**	**2018/19**	**2019/20**	**2020/21**	**2021/22**
Homeless - priority unintentional	274	270	303	274	309
Homeless - priority intentional	42	49	36	20	6
Potentially homeless - priority unintentional	46	59	44	36	66
Potentially homeless - priority intentional	3	4	3	4	2
Neither homeless nor potentially homeless	65	62	42	38	40
Applicant resolved homelessness prior to assessment decision	63	72	60	54	40
Lost contact before assessment decision (from 1 April 2007)	6	7	4	7	6
Withdrew application before assessment decision (from 1 April 2007)	32	35	32	20	36
Ineligible for assistance (from 1 April 2007)	6	9	8	1	3
All	537	567	532	454	508

Source: HL1 data

The table above demonstrates that overall, an increasing number of priority applicants are being assessed as 'unintentionally homeless' while 'intentionally homeless' cases are reducing. The number succeeding in resolving their situation prior to officers reaching a decision has also reduced. This puts greater pressure on housing to provide settled accommodation whilst attempting to reduce the time any applicants stay in temporary accommodation. This demonstrates why the quota of allocations for cases assessed as homeless has been increased in recent years to 50%.

Rough Sleeping in Moray
Scottish Government data (**Table 5**) shows that overall, the prevalence of rough sleeping is slowly reducing which is also evident in Moray. In Moray, there was an upturn in numbers of applicants identified as having slept rough during the previous 3 months when assessed in 2021/22. This was significant for Moray as some local authorities showed no increase during the same period. Homeless applicants self-certify that they have slept rough and while it is important to gather this information, Officers do not observe rough sleepers on the streets of Moray in a manner similar to the streets of Scotland's larger cities (i.e. Glasgow, Edinburgh, Dundee and Aberdeen).

Table 5	2017/18		2018/19		2019/20		2020/21		2021/22	
Slept rough night before	27	5.02%	35	6.10%	31	5.85%	22	4.84%	27	5.30%
Slept rough in last 3 months	71	13.20%	86	14.98%	61	11.51%	68	14.95%	54	10.61%

Source: HL1 data

Whilst the allocations quota for homeless applicants has been increased in recent years, the development of a Housing First service is expected to show a reduction in the number of future rough sleepers. RSL's will be nominated Housing First clients in due course as per the new nominations agreements.

Housing Options/ Homelessness Prevention
Housing options is defined by the Scottish Government as "a process which starts with housing advice when someone approaches a local authority with a housing problem." Local authorities must take a holistic approach and offer advice and assistance specifically tailored to an individual's circumstances. The aim of housing options is to prevent homelessness (where possible) before it occurs.

In October 2010, the Council introduced its Housing Options Team. The Team has evolved over time and currently provides an advice service to households who are generally in accommodation but experiencing housing difficulties. The Housing Options team are also often the first contact for homeless applicants.

The Council has robust mechanisms in place to ensure that there is no "gatekeeping" of those who attend a housing options interview. All households are informed of their right to make a homeless application and sign off the advice they have received and the options they decide to pursue.

Housing Options continues to be an effective service that can prevent homelessness and alleviate other housing situations which, if not addressed, can lead to homelessness. A thorough and comprehensive review of the service is due during 2023/4 which will include additional training for the staff.

Whilst a short survey of local Lettings Agents in Moray has demonstrated that tenants who hold Private Residential Tenancies are tending to stay in their current accommodations, landlords are keen to increase rentals or 'cash in' on a buoyant housing market and sell their properties. Landlords who have sold their properties have done so due to the rising level of property values or the increasing legislation they must adhere to and the reducing profit element of the rent. This all points to a potential future increase of homeless applications.

Table 6 provides details of the number of households who have received a housing options interview and the outcomes that resulted from this:

Table 6: Outcomes	2017/18		2018/19		2019/20		2020/21		2021/22	
	No.	%	No.	%	No.	%	No.	%	No	%
Remained in current accommodation	246	23.30%	337	31.55%	342	33.20%	248	30.92%	339	36.53%
Made homeless application to LA	446	42.23%	375	35.11%	342	33.20%	323	40.27%	338	36.42%
Moved in with friends/relatives	99	9.38%	125	11.70%	127	12.33%	81	10.10%	90	9.70%
LA tenancy	27	2.56%	46	4.31%	56	5.44%	39	4.86%	46	4.96%
Private rent-short assured/PRT	82	7.77%	67	6.27%	53	5.15%	39	4.86%	41	4.42%
Other (known)	15	1.42%	20	1.87%	22	2.14%	18	2.24%	24	2.58%
Not known	17	1.61%	7	0.66%	6	0.58%	10	1.25%	18	1.94%
Housing Association tenancy	19	1.80%	17	1.59%	29	2.82%	16	2.00%	12	1.29%
Lost contact prior to final outcome	84	7.95%	44	4.12%	38	3.69%	17	2.12%	11	1.19%
Lodger	8	0.76%	13	1.22%	6	0.58%	2	0.25%	4	0.43%
Bought own home-other means	4	0.38%	8	0.75%	2	0.19%	2	0.25%	3	0.32%
Supported accommodation	1	0.09%	1	0.09%			1	0.12%	1	0.11%
Shared property-Private rented	2	0.19%			2	0.19%			1	0.11%
Women's refuge			1	0.09%					0	
Residential care/nursing home			1	0.09%			1	0.12%	0	
Low cost home ownership			1	0.09%					0	

Table 6: Outcomes	2017/18		2018/19		2019/20		2020/21		2021/22	
	No.	%	No.	%	No.	%	No.	%	No	%
Sheltered accommodation	3	0.28%			1	0.10%	1	0.12%	0	
Shared property LA	2	0.19%							0	
Shared property RSL					1	0.10%			0	
Prison	1	0.09%	3	0.28%	2	0.19%	4	0.50%	0	
Hospital			1	0.09%					0	
Private rented assured tenancy			1	0.09%	1	0.10%			0	
Total	1056	100%	1068	100%	1030	100%	802	100%	928	100.00%

Source: PREVENT1 Data (Annual report for Moray).

Although the Council has been unable to implement its RRTP in full, there have been areas where improvements have already been made. One area is the average time taken from receiving a homeless application to full 'discharge of duty' which has fallen from **135** days in 2020/21 to **121** in 2021/22. One area of concern by HARSAG was the length of time it took applicants to navigate the 'homeless process'. This needed to be minimised in order to reduce the stresses associated with households being homeless. This has been successfully reduced, in part due to the reduced number of applications, but the aim is to further reduce this time period in 2022/23 to **100** days.

Housing Options work in partnership with other Council Services, Partner Agencies, the third sector and families to prevent and alleviate homelessness. Current services/partners include:

Council Services
- Housing Support Service (community) and Housing Support Service (temporary accommodation);
- Occupational Therapist (based in Housing Team and jointly funded by the Moray Integration Joint Board);
- Community Safety Team;
- Money Advice; Income Maximisation; and Welfare Benefits Teams;
- Children and Family Social Work Services;
- Criminal Justice/Youth Justice; and
- Revenues Team which incorporates Housing Benefit.

<u>Partner Organisations</u>

- Moray Integration Joint Board;
- Citizens Advice Bureau;
- Arrows (Drug and Alcohol Service);
- Advocacy Services; and
- Moray Women's Aid (includes residential support service for women experiencing or at risk of domestic abuse)
- SACRO (Residential Support Service for those with Addictions)
- SACRO (Residential Support Service for young people 16 -24)

Homeless households continue to present to the local authority with a range of vulnerabilities. These can often become a barrier into permanent accommodation and extend the period of time that households remain in a homeless situation. Housing Support is a key element of the service which can be adjusted to accommodate the level of support required by the applicant to enable households to move through the system sooner. Levels of support can be low, medium or high for someone with more complex needs or who experience severe multiple disadvantage.

Of the 354 households who received housing support in 2021/22, 133 were already involved with other services. Lack of life-skills (197) was the highest reason for requesting the service. This was followed by Alcohol/Substance misuse (75) Financial/Literacy (41), and Poor Mental Health (40). This service continues to operate under pressure.

Table 7 highlights the type of vulnerabilities that homeless people in Moray are presenting with. Many applicants have more than 1 identified vulnerability:

Table 7 - Types of Identified Vulnerabilities	2018/19	2019/20	2020/21	2021/22
Financial difficulties /debt /unemployment	160	206	234	195
Physical health reasons	139	120	148	188
Mental Health reasons	268	244	239	316
Unmet need for support from housing/social work/health services	11	7	13	8
Unmet need for support from friends/family	82	63	77	102
Difficulties managing on own	57	43	40	49
Drug/Alcohol dependency	71	41	60	57
Criminal/anti-social behaviour – victim	31	20	43	61
Criminal /anti-social behaviour - perpetrator	20	17	15	41
Not to do with applicant household (e.g. landlord selling property, fire, circumstances of other persons sharing previous property, harassment by others, etc.)	19	8	8	8
ALL	**858**	**769**	**877**	**1025**

Source: Prevent 1 data – This became a mandatory reporting requirement to the Scottish Government in 2014/15.

Mental Health and Poverty
Poor mental health and poverty levels continue to be the main reasons for vulnerability. Together, these account for 50% of referrals, although applicants can present with both.

The Housing Service seeks to prevent households in rent arrears from being evicted from council housing. If court action is initiated, Housing Operations Managers will thoroughly review each case and agree actions to prevent eviction where possible. This includes attempting to engage with the tenant after Decree has been obtained and up to the point of the eviction. The approach is multi-disciplinary with Housing Managers, Housing Officers, Children and Families Social Work, Housing Options and the Housing Support Teams all playing key prevention roles. Emergency legislative changes due to the pandemic were put in place and were effective from April 2020 to March 2022. Regulations which temporarily prevented the enforcement of evictions ended nationally in August 2021. The changes resulted in a reduction from 1151 tenancy terminations (due to evictions and abandonments) in 2019/20 in

Scotland of which 1112 (or 97%) were due to rent arrears. This dropped to 32 terminations in 2020/21 with only 3 cases (or 9%) due to rent arrears. Eviction continues to be the option of last resort and the Council will only pursue this where the household refuses to engage with services. **Table 8** sets out the number of court actions and the number of evictions in Moray.

Table 8	2017/18	2018/19	2019/20	2020/21	2021/22
Court Actions initiated with the potential for eviction	61	58	78	0	2
Number of properties recovered because rent had not been paid	9	10	10	0	1
Number of properties recovered because of antisocial behaviour			1		
Total	**9**	**10**	**11**	**0**	**1**

Source: ARC data

Mental/Physical health
These can sometimes be complex and require a multi-disciplinary approach to find the most appropriate housing solution. Homeless households who self-identify that they have problems with their mental and/or physical health may not have a clinical diagnosis but continuing research into health and homelessness supports a conclusion that being at risk or becoming homeless does have a detrimental impact on people. The Housing Service has developed strong links with the Moray Integration Joint Board (MIJB) and there are many examples of good practice both in terms of joint working and the delivery of new housing services for those with complex needs.   The MIJB has jointly funded an Occupational Therapist located in the Housing Service. This post works closely with the Hospital Discharge Team and assesses health and housing needs which has proved very effective. It has stopped homeless cases arriving unexpectedly at Moray Council and enabled applications to be fast-tracked through the system. It has not only averted homelessness but has also resulted in a reduction in 'bed-blocking' and applicants having shorter periods in temporary accommodation.

There is need for all services to improve their understanding of mental/physical health and how this can impact on households who become homeless or at risk of homelessness.   There is a need to develop a joint approach with other services rather than homelessness simply being regarded as a "housing problem".

Unmet need for support

More than half of homelessness presentations arise due to relationship difficulties with their household. Households who indicated a lack of support from housing/social work/health services will be targeted for Housing First. Local knowledge and the consistency of data over the last 5 years justify an annual requirement for 10 Housing First cases per year. The Council has had difficulty recruiting support worker staff to develop this service. This isn't unique to Moray Council as it is known that other providers have experienced similar difficulties. However, 2 staff have now been seconded to these posts for a 2 year period and the service became operational from June 2022. The number of households identified for Housing First will be reviewed on an annual basis.

Drug and Alcohol Dependency

The number of households who self-identified that they were vulnerable due to drug/alcohol misuse has reduced in recent years. While this is welcome, households with these problems can often be the most difficult to accommodate. SACRO works in partnership with the Council to provide a residential housing support service for households with these difficulties.

Antisocial behaviour/Homelessness

The Community Safety Team is a multi-disciplinary Team involving staff from Environmental Health, Housing, Police, Social Work and Education (when appropriate). They work together to tackle and reduce anti-social behaviour across all tenures in Moray. In terms of homelessness, a low number of households report that they are vulnerable due to anti-social behaviour either as a victim or perpetrator.

5.   Health and Homelessness

On 19 June 2018, the Scottish Government published a study exploring the relationship between homelessness and health. This built upon analysis undertaken in the USA by Fife Council and NHS Fife in 2015. The study links homelessness and health datasets for the first time at a national level and explored the relationship between homelessness and health in Scotland.

This research combines Scottish Government homelessness data (HL1) with six health datasets from NHS National Service Scotland covering Accident and Emergency attendances (A&E2), Inpatient admissions (SMR01), Outpatient appointments (SMR00), Prescriptions (PIS), the Scottish Drugs Misuse Database (SDMD) and Mental Health admissions (SMR04), together with information about deaths from National Records of Scotland. The key findings from the study were:

- At least **8% of the Scottish population** (as at 30 June 2015) had experienced homelessness at some point in their lives.
- Of those who had experienced homelessness at some point:

    o Over half (51%) had no evidence of health conditions relating to drugs, alcohol or mental health. This was much lower than in the control groups (MDC 74%, LDC 86%).
    o Around 30% had evidence of a mental health problem at some point during the study period (with no evidence of drug or alcohol-related conditions at any point). This was higher than in the control groups (MDC 21%, LDC 13%).
    o There was evidence of drug and/or alcohol-related interactions for the remaining fifth of people (19%), higher than in the control groups (MDC 5.1%, LDC 1.2%). Of these, the vast majority (94%) also had evidence of mental health issues.
    o Around **6%** of people experiencing homelessness **had evidence of all three** of the following conditions – a mental health condition, a drug-related condition and an alcohol-related condition – although not necessarily at the same time. This was much higher than in the control groups (MDC 1%, LDC 0.2%). The figure was markedly higher for those experiencing repeat homelessness (11.4%).

- Increased interactions with health services preceded people becoming homeless.
- A peak in interactions with health services was seen around the time of the first homelessness assessment.

Repeat Homelessness in Moray

Table 9 shows the number of repeat homelessness cases in Moray. This figure is consistent with the number of households that claim they have unmet need from various services and they tend to float in and out of homelessness. These are the households that will be targeted for Housing First.

Table 9	2017/18	2018/19	2019/20	2020/21	2021/22
Repeat homelessness	14	31	26	13	15

Source: HL1 data

RRTP Priorities –Poverty/Health/Housing Support/Housing First/Housing Options.

Good communication is vital with any service to the public and those involved with the RRTP will ensure that all available information is provided in different formats, in a clear and concise manner, which will enable households to determine what may be available to

them. Where possible, this will include digital technologies with applicable training for those that require it. Service user consultation will also be a priority through to cases which become closed.

Poverty

i)   Given the current financial climate, and in particular energy inflation, there is a greater need than ever to improve awareness of the vulnerabilities that affect potentially homeless households and identify early intervention options to prevent homelessness. Updating and publicising what financial options are accessible will assist with the prevention of homelessness. In addition to being provided to households, this awareness will be directed at agencies who work with people who are homeless or at risk of homelessness.   This will be progressed and delivered through the North East, Highlands and Islands Homelessness Hub Group, the council's corporate training team and the new Housing Options Toolkit (**YEAR 1**)

ii)   A well trained workforce is essential to the effective delivery of Housing Options services. The Housing Options Toolkit which has been developed, provides a range of training aids to address the needs of frontline staff. Training can be carried out at a time suitable to the staff member, although some will be delivered by the council's corporate training team in consultation with service managers. Topics include homelessness legislation, tenancy sustainment, health and well-being, income and affordability and employment and training. This is aimed at improving the level and type of advice that staff can provide to households seeking housing options advice. Suitable training for applicants will enhance their employability and either assist them into employment or into better paid jobs thus reducing dependency on state benefits. **(YEAR 1-2)**

Health and Homelessness

i)   There is a need to improve awareness of the mental and physical health vulnerabilities that affect households who are homeless or at risk of homelessness. This awareness will be directed at services and agencies who work with households who are homeless or at risk of homelessness.   This will be progressed and will be delivered through the North East, Highlands and Islands Homelessness Hub Group. (**YEAR 1 - 2**)

ii)   The Housing Options Team will also receive enhanced training in relation to mental and physical health vulnerabilities. This is aimed at improving their understanding of poor mental and physical health and the barriers that this can cause for households who are homeless or at risk of homelessness. The training will be delivered by the council's corporate training team in consultation with service managers from the MIJB. **(YEAR 1 - 2)**

iii)   There is a need to further develop a collaborate approach with Moray Integration Joint Board, Social Work and other key partners to deliver better outcomes for households at risk of homelessness and who are vulnerable due to mental or physical health. (**YEAR 2**)

Housing Support

Housing Support is a vital component in preventing homelessness and ensuring that households are able to move into permanent suitable accommodation as quickly as possible. Housing Support can be provided at varying levels (low, medium, high). When a need is identified, support staff can work with the tenant to either address the issue or ensure any situation is contained and does not deteriorate to an extent where the tenancy is at risk.

Housing First

Housing First separates the provision of housing and support and offers choice and control to tenants. The Housing First model provides ordinary, settled housing as a first response for people with complex needs. It recognises a safe and secure home as the best base for recovery and offers personalised and be-spoke support for people to end their experience of homelessness and address their wider needs. The model requires a more intensive level of support to be offered as clients generally have more severe levels of need. This can be challenging for staff and clients as there may be setbacks to progression with clients who, for example, have experienced long term abuse of alcohol or drugs. The RRTP recognises the need to enhance the service and now has 2 staff employed to work with more challenging cases. These staff work with vulnerable households at risk of homelessness (including council tenants). Part of their role is to front load support at an earlier stage to prevent homelessness where possible. Staff will be flexible in their approach to dealing with these challenges and, with the clients' agreement, increase or reduce support as the client progresses along their journey to a more settled lifestyle.

The Health and Homelessness Data Linkage study found that "around **6%** of people experiencing homelessness had evidence of all three of the following conditions – a mental health condition, a drug-related condition and an alcohol-related condition". In Moray, this estimate would be around 10 households. They include households who live chaotic lifestyles, experience repeat homelessness and are high consumers of NHS services.

i)   Housing First commenced in June 2022 following recruitment of 2 staff. Both staff members are currently in training whilst suitable candidates for the Housing First service are being identified. (**YEAR 1**)

ii)   Once the service is operating effectively, 2 Moray Council managers will arrange a presentation to local Registered Social Landlords to advise them of the service and of the requirement for them to become involved in the provision of suitable accommodation. **(YEAR 2)**

iii)   To keep costs low and ensure properties are of a reasonable standard it is intended to use the council's housing stock for the initial Housing First allocations.   There will be occasions where tenancies will have to be held past the normal void period to allow the smooth transition of more chaotic households into housing. To ensure that the Housing Revenue Account (HRA) is not financially disadvantaged, costs have been included within the RRTP to reduce unavoidable rent loss. These costs will focus on the average weekly rent for a 1 bedroom property, which is currently £59.73, and allow up to a 4 week delay for each of the 10 Housing First Properties. There will of course be other cases where delays will occur and the HRA will be compensated where this occurs up to the costs set out within the resources available. **(YEAR 1+)**

iv)   There will also be a small contingency per year to enable Housing First staff to provide emergency funding where necessary. This would include, but is not restricted to, electricity or gas payments where a meter has used all credit and the tenant is living in a cold house. There may also be instances where food will need to be supplied if the tenant hasn't budgeted properly or payment of minor rent arrears to avoid any further escalation. Strict guidelines will be developed to ensure that only appropriate payments are made. (**YEAR 2**).

v)   Housing First properties will need to be furnished. CF Services Ltd and Moray Fresh Start (Third Sector Organisation) currently work with Moray Council when temporary accommodations require to be furnished or starter packs need to be provided to tenants. This has worked well to date and this arrangement will continue for those in Housing First properties. (**YEAR 1**)

vi)   Based on current assumptions, it is anticipated that a maximum of 10 Housing First properties will initially be required (**YEAR 1).** However, managers will review Housing First on an annual basis and this will determine the number of properties that it requires annually.

vii)   Costs relating to Housing First from Year 2 to Year 4 are included in the allocated RRTP funding.

Housing Options

The Council participates in the Highlands and Islands Housing Options HUB and uses this opportunity to benchmark and share best practice on issues relating to homelessness. The HUB has previously delivered awareness training to a range of staff on issues facing homeless households and through this involvement, Officers will request that further training events are delivered specific to areas of health and vulnerability. (**YEAR 1**)

i)   The Housing Options Toolkit is now available. The Council will use this toolkit to further develop the Housing Options and Homelessness Services and carry out a thorough review in 2024/25 to maximise efficiencies. (**YEARS 1 and 3**)

ii)   The Council has protocols in place for those at risk of homelessness who are leaving the Armed Forces, Hospital and/or Prison. The Armed Forces Protocol was reviewed during 2017/18 and a revised protocol agreed from 1 September 2017. The Council and the MOD joint Services Housing Advice Office are joint signatories to the revised discharge arrangements. The Hospital Discharge Protocol was reviewed during 2018/19 and revised arrangements were agreed from 1 November 2018. The Council, NHS Grampian and the MIJB are joint signatories to the Protocol.   The Prison Discharge Protocol (implemented 1 May 2012) will be updated to include SHORE standards (Sustainable Housing on Release for Everyone). As part of this review, the Council will consult with key stakeholders including Scottish Prison Service, Social Work, Criminal Justice, Youth Justice, MIJB and service users. The Prison Discharge Protocol will be reviewed in 2022/23 with all others reviewed in 2023/24. (**YEARS 1 and 2**).

iii)   The RRTP will require the Council to regularly update policies and procedures relating to Housing Options and Homelessness. They will also develop a comprehensive Training Plan for Housing Options activities in consultation with the Highlands and Islands Housing Options HUB. (**YEAR 1**)

Homelessness in Moray

Table 10 shows that, apart from 2020/21, homelessness has continued at comparable levels since 2017/18. The pandemic may have played a part in 2020/21 as people had to remain in their current accommodation.

Table 10	2017/18	2018/19	2019/20	2020/21	2021/22
Homeless Assessments completed	537	572	528	455	507

Source: HL1 data

Source: HL1 data

6.   Temporary Accommodation

The Council has continued to reconfigure its supply of temporary accommodation since 2010/11. It has reduced or stopped using a number of expensive units (i.e. private sector leasing, RSL accommodation, Service Family Accommodation etc.). This was to lessen the costs both for homeless households and the Council. During the pandemic lettings of local authority properties were paused for a period of time. This meant that the numbers being homeless or threatened with homelessness increased. Households who were already in temporary accommodation needed to remain there longer than would normally be the case as allocations were not being made. This meant that there was a backlog of cases to rehouse when the allocations were once again permitted. The number of cases were regularly monitored and managed which, when circumstances permitted, allowed households who had been in temporary accommodation for the longest period to be prioritised for rehousing soonest.

At 31 March 2022, the number of temporary accommodation units were reduced to 139 although the intention is to reduce this further to no more than 120 units during 2022/23. Of the 139 units, 106 were occupied with an average length of stay of 133 days. A further 33 properties (across all providers) were void of which 11 were waiting a new tenant.

The proposed reductions will be achieved by improving the re-let times for void properties from its current level of 60+ days. This will assist with keeping void loss to a minimum and allow households living in temporary accommodation to move out quicker thus reducing both the time they stay in temporary accommodation and enabling that property to be reused by another homeless household. However, care will be taken to ensure that the number of temporary accommodation units are as close to the number of households who require accommodation as possible. It should, however, be noted that we have little control over the number of void properties that may be made nor the number of households who may present themselves as homeless.

Current provision includes self-contained, dispersed temporary accommodation and supported temporary accommodation which are spread across Moray. The accommodation is mainly drawn from existing social rented stock rather than specialist supported housing facilities.

The Temporary Accommodation Working Group which comprises Housing Needs Manager, Supported Accommodation Manager, Housing Needs Operational Manager, Senior Housing Needs Officer and Operational Manager meet every 3 weeks to discuss the live cases and determine the number of temporary accommodation units required to meet statutory homelessness duties. The fit between supply of, and demand for, temporary accommodation is subject to continuous monitoring, re-assessment and reconfiguration. This flexible approach allows the Council to **minimise the cost of** temporary accommodation and ensure stock is

provided in required locations. This group has created efficiencies which has reduced the number of temporary accommodation units and the amount of time homeless applicants spend in temporary accommodation. During 2020/21 the average time spent in temporary accommodation was **152** days. This reduced to **133** days in 2021/22. The aim is to reduce this further to **110** days in 2022/23. The new Housing First staff will also focus on reducing the lengths of stay in temporary accommodation. Interestingly, Brexit had minimal impact for demand of temporary accommodation in Moray. Ukrainian refugees have, so far, been similar but there are reports of relationships between Ukrainians and hosts of 'Homes for Ukraine' breaking down in neighbouring council areas which has resulted in homeless presentations. This will be closely monitored as it may have an impact on our ability to reduce the number of temporary accommodation units. (**YEAR 1**)

Temporary accommodation units include:

Cameron Parkbrae, Elgin
This is a local authority owned, purpose built, hostel which was opened in July 1996. It is funded from General Services. It has 10 units of self-contained furnished accommodation (3 bedsits, 5 x 1 beds and 2 x 3 beds). It also has two offices. The facility is open 24/7 and incorporates the first point of contract for the Council's Out of Hours service.

St Andrews Square, Buckie
This is a purpose built hostel with 13 units of self-contained furnished accommodation. It is leased from Langstane Housing Association and opened in July 2009. It is funded from General Services and has 8 x 1 bedrooms, 5 x 2 bedrooms and 1 office.

Dispersed Properties (Council/RSL)
There are 94 Council and 14 RSL dispersed properties. These are located across Moray. The Council makes provision to rotate temporary tenancies after 3 years (or sooner if circumstances dictate). Only 78 properties are eligible for rotation.

Supported Accommodation
The Council has 19 units of supported accommodation which are all managed through 2 external housing support contracts. The funding of these comes from General Services. SACRO provide shared accommodation at Guildry House, Elgin. The remaining contract is with Moray Women's Aid who have a hostel in Elgin.

- Guildry House, Elgin

This provides 10 units of shared accommodation for single people with alcohol/substance dependency. The property is leased from Langstane Housing Association. The service is funded from General Services on a 3 year contract which is due to expire on 30 June 2022. This will be subject of a tender exercise in 2022.

- Moray Woman's Aid, Elgin

This provides accommodation with support to women who are at risk of, or who are, fleeing domestic abuse. This is a purpose-built hostel owned by Langstane Housing Association. The building has 7 self-contained units (2 x bedsit, 3 x 2 bedrooms and 2 x 3 bedrooms). Moray Women's Aid also lease 2 x 1 bedroom dispersed properties in the community from the Council. The contract with MWA is due to expire on 31 March 2023. This will be subject to a tender exercise in 2023.

Table 11 illustrates temporary accommodation (by type) and the number of households who were placed there in 2021/22.

Table 11 Overarching type of provision	Temporary Accommodation Type	No. of households living in the TA at 31 March 2022	Total households who have entered accommodation between 1 April 2021 and 31 March 2022	Total households who have left accommodation between 1 April 2021 and 31 March 2022 (placements ending)	Estimated occupancy in the year
Emergency	5.6 Bed and breakfast	**0**	**0**	**0**	**0**
Interim	5.1 LA ordinary dwelling	73	274	360	431
	5.2 Housing association / RSL dwelling	7	42	50	57
	5.3 Hostel - local authority owned	0	4	7	7
	5.4 Hostel - RSL	0	21	75	90
	5.5 Hostel - other	15	0	0	0
	5.7 Women's refuge	4	8	7	22

	5.8 Private sector lease	0	0	0	0
Interim Total		**99**	**349**	**499**	**607**
Other	5.9 Other placed by authority	0	0	0	0
Grand Total		**99**	**349**	**499**	**607**

Source: Moray Council records

Emergency Accommodation

Bed and Breakfast accommodation is no longer used and would only be considered in a dire emergency situation. It remains the option of last resort. Legislation has also been reviewed in 2020 (Interim update of Code of Guidance Nov 2019) to further strengthen the rights of homeless persons requiring accommodation. This has put additional pressure on all local authorities when deciding the standard of accommodation and who should be accommodated in them.

As at 1 April 2022, the Council had 137 units of temporary accommodation.

7. Affordability

The Local Housing Allowance (LHA) represents the maximum amount of rent that can be paid through Housing Benefit/ Universal Credit, and is determined by the household size. In Moray there are significant differences between the LHA and average market rents. LHA rates are based on rents and are limited by legislation. In Moray LHA rates have been reduced over time although they were increased by Central Government in April 2020 in response to the Covid 19 pandemic. They currently remain at their elevated level.

Table 12 compares average local private sector rents with LHA rates and shows there is a significant shortfall between the two. Where rent is higher than the LHA payable, the tenant must make up the difference from their income. The largest shortfall in percentage terms is in the 1 bedroom rate (18%) whereas in monetary terms it is the 3 and 4 bed rate at £21.16 to £23.58 which may be reflected in the higher demand for Council accommodation.

Table 12 Private Sector Rent/ LHA comparison 2021

Property size	Median Rents Highlands and Islands 2021		LHA 2020-23	Difference per week	
	per month	per week	per week	%	£
1 bed shared rate (applicable to <35s)	£360.00	£83.07	£74.79	11	8.28
1 bedroom	£500.00	£115.38	£97.81	18	17.57
2 bedrooms	£600.00	£138.46	£126.58	9.5	11.88
3 bedrooms	£725.00	£167.30	£146.14	14.5	21.16
4 bedrooms	£900.00	£207.69	£184.11	12.8	23.58

Source: https://www.gov.scot/publications/private-sector-rent-statistics/

Whilst the median pay for all Scotland's employees (part time and full time) in 2021 was £14.28 per hour, according to a research briefing published in October 2021 by the Scottish Parliament (Annual Survey of Hours and Earnings – ASHE), Moray has the lowest average hourly rate of pay (excluding overtime) based on place of residence at £11.83. Moray is also the third lowest when assessed as place of work at £12.44. This has a negative impact on affordability for Moray's residents.

The HNDA carried out in 2017 found that only:

- 45% of households can afford lower quartile house purchase;
- Lower quartile income households could afford to buy properties priced at no more than £54,520;
- Only 50% of households can afford to rent from the open market; and
- Lower quartile income households could afford rents of not more than £65.53 per week/ £283.96 per calendar month.

However, given the current financial climate of high Consumer Price Inflation (9.1%) it is likely that the above figures will show a worsening situation when updated later this year.

<u>Temporary Accommodation Charging Policy</u>
The policy aims to ensure that the rent charged for temporary accommodation is affordable to all, whilst ensuring that it does not act as a disincentive to work and that rent is recovered to its maximum potential.

The specific objectives are to:

- use a cost effective and fair rent setting process,
- ensure temporary accommodation is an affordable option to all; and
- use recovery practices which take account of a household's income and their ability to pay.

The Policy states "When setting the rent level for temporary accommodation, the Council will charge every household the same level of rent, regardless of income. However, in order to ensure that temporary accommodation is an affordable option to all, the Council will only seek to recover those costs that it can reasonably be expected to collect.

The level of rent charged for temporary accommodation is set in accordance with the Local Housing Allowance, plus a £45 management fee. The management fee seeks to recover the cost of decoration, voids, electric/gas checks, deliberate damage, furnishings and floor-coverings". This is scheduled to be reviewed in 2023.

Table 13 provides details of the rent levels charged by property size:

Table 13 Temporary accommodation rents (2022 – 2023)		
Property size	**Rent charged per week (including management fee)**	**Rent payable per week by tenants on partial Housing Benefit / not entitled to Housing Benefit (average council rent + 10%)**
Single room rate for under 35 years/ Bedsit	£119.79	£48.59
1 bedroom	£142.81	£65.70
2 bedroom	£171.58	£77.14
3 bedroom	£191.14	£89.47
4 bedroom	£229.11	£113.05

Source: Moray Council records

Rent charges are reviewed as part of the Council's annual budget setting process. Annual increases in rents are influenced by the property size, the household type and capping levels imposed through Local Housing Allowance and welfare reform. Performance relating to the operation of this policy has been reported annually to the Housing and Community Safety Committee.

RRTP Priorities – Temporary Accommodation

i)   At 1 April 2019, the Council had 173 units of temporary accommodation. Three years later, that had dropped to 137 units. The Temporary Accommodation Policy allows tenancies to be rotated. It is not practical or sensible however to do this over a short period of time as it generally takes around 3 years to recoup the cost of the furniture package. There has been a practice over a number of years of 'flipping' properties. That is changing the status from a temporary accommodation unit to a Scottish Secure Tenancy (SST) for the person or family who currently reside in that property. This means that they do not require a move to another property and the number of temporary accommodation units reduces naturally. This, of course, only applies if the property is entirely suitable for the current occupants. During the year, numbers of temporary accommodation units can increase as demand dictates. Additional units were required during the height of the pandemic as void properties were unable to be allocated and homeless applications continued to be received but numbers have now reduced. (**YEAR 1+**)

ii)   Further reductions will continue in future years although they will fall to a level whereby it would not be wise to reduce them any further. Families with Children, Condition, Cost and length of time that a property has been used as temporary tenancy will be the main consideration when deciding which properties should be returned to mainstream let.

8.   **Housing Supply Target and Investment**

The latest HNDA which was carried out in 2017 found that 1,179 affordable homes would be needed over 2018-2023, and that there was a significant shortfall in availability of affordable housing. The high proportion of single person homeless households resulted in significant pressure on 1 bed social rented housing, both from temporary accommodation use and as an affordable permanent housing option. The aim was to have 30% of all new build properties as 1 bedroom units. This has been achieved since the HNDA was completed in 2017 and has eased pressure for that particular group of applicants.

The 2020 Local Development Plan affordable and accessible housing policy (DP2) requires 25% of new housing developments to be "affordable" and that in the majority of cases this affordable housing is provided within the site. The affordable housing mix must be agreed with Housing as part of the planning process. The definition of what we regard as affordable is set out in Policy DP2.

Housing is routinely consulted on planning applications falling within the scope of Policy DP2 and the policy is enforced equitably and usually supported by a Section 75 agreement. The vast majority of affordable housing delivered in Moray is sourced through this policy via Section 75 agreements.

The Housing Supply Target (HST) is detailed in the LHS 2019/2024 and was subject to extensive public consultation. The HST is disaggregated to Housing Market Area (HMA) level and tenure e.g. social rent, intermediate tenures, mid-market rent or shared equity. Approximately half of Moray's households live in the Elgin HMA and therefore approximately half of the Housing Supply Target provision has been assigned to Elgin HMA.

Scottish Government funding for affordable housing is set out and prioritised in the Strategic Housing Investment Plan (SHIP) which is refreshed annually and published on the Council's website. The current level of completed and projected completions of affordable housing are presented in the table below:

Table 14 Completed and projected completions of Affordable Housing	2019/20	2020/21	2021/22	2022/23	Total
No of Completions	72	102	109	193	**476**

Source: Moray SHIP 2022/23

The Council is one of 9 social landlords working together to supply new build properties in Moray. The Housing Business Plan of 2016 made provision for 70 units of new build housing per year until 2020/21. However, the number of affordable units delivered through the SHIP did not achieve the level required within the HNDA 2017, due to limited investment funding. A further review of the Housing Business Plan in 2019 agreed that this should be reduced to 50 units with a further review earlier this year confirming the status quo.

The Council aims to achieve an appropriate balance of supply and demand and the LHS 2019–2024 continues with this approach to social housing mix in its Housing Supply Target.

The Toolkit supplied alongside the Scottish Government's guidance provides a statistical analysis of the shortfall in supply required to achieve rapid rehousing within 5 years. In Moray, the toolkit has identified **a shortfall of 635 lets over 5 years (127 lets per year)** to be allocated to statutorily homeless households. Current turnover of existing and new build properties fall short of that requirement.

Homeless households are significantly less likely to require sheltered and extra care housing. Also the turnover rate for sheltered/extra care housing is significantly higher than for general needs stock. Therefore, for the purposes of the RRTP, sheltered/ extra care housing allocations have been separated, in an effort to accurately represent availability to homeless households.

During 2018/19 the Council allocated 46.2% of its general properties to homeless households. This increased in 2020/21 to 49.2% and again in 2021/22 to 52.6%. By comparison, RSL allocated around 53% of their general properties to homeless households in 2018/19 increasing to around 63% and 49.6% in 2020/21 and 2021/22.

How the Council allocates its housing
The Council allocates its own vacancies in accordance with its Allocations Policy from 3 separate housing lists – Waiting, Transfer and Homeless Lists.   A quota system is applied to each list – Waiting (32%), Transfer (18%) and Homeless (50%). Each list allows a quota target tolerance of 5 +/-. These quotas aim to strike an appropriate balance between all needs groups and are reviewed on an annual basis. The Waiting and Transfer list applications are prioritised using a points-based system, and Homeless List applicants are rehoused chronologically. Whilst the quotas could be adjusted to increase the number of allocations to those on the Homeless list, there is a risk that the public will perceive homelessness as the only or quickest route to rehousing. This would simply encourage more homeless applications and would be counterproductive to the ethos of HARSAG. These quotas are unchanged for 2022/23 as they are still considered an acceptable balance between housing lists.

Table 15 presents the allocation quotas for 2022/23 which remain the same as 2021/22:

Table 15:	Quotas for 2022/23	Variation
Homeless List	50%	+/- 5%
Waiting List	32%	+/- 5%
Transfer List	18%	+/- 5%

Source: Council Housing Allocation Quotas – 2022/23

These quotas will be reviewed on an annual basis.

<u>Registered Social Landlords</u>
The Nominations Agreements for all 8 RSL's operating in Moray are currently being reviewed. In some, we are suggesting a higher percentage of re-lets be designated for nominations to reduce pressure on the Council housing lists, although this is open to negotiation. In cases of new build properties, Moray Council have agreed 100% nomination rights with some RSL's and we aim to have all RSL's sign up to this level. All RSL's will be advised in the near future of the RRTP and Housing First requirements and we will emphasise that appropriate support will continue to be provided for more complex allocations. We have a good working relationship with all RSL's and anticipate that this will continue.

9)   **PARTNERSHIP APPROACH**

The Council works with a range of Council Services/Partners to deliver services for homeless households. The RRTP requires a new discipline with regards to the individual/collective contributions that each will make to improve the outcomes for those who are homeless or at risk of homelessness.

<u>Moray Integration Joint Board</u>
The MIJB is able to provide specialist support not immediately available within the Housing Service. Access to such services will be essential to help vulnerable households move into and thereafter sustain their own accommodation. The RRTP will develop an approach involving Housing and the MIJB to support the smooth transition of vulnerable households into Adult Services. This approach will include the Council's Drug and Alcohol Team and other addiction services such as Arrows. Household's eligible for long term support will include a significant proportion of Housing First cases.

<u>Moray Fresh Start (MFS)</u>
Moray Fresh Start currently offer starter packs for homeless households. This enables them to move earlier into their own accommodation.

<u>Moray Food Plus</u>
The Council works in partnership with Moray Food Plus. Food can now be accessed direct from homeless hostels. Whilst MFP do not wish to expand their service into other types of provision, they have confirmed that they could provide more food parcels if required.

<u>Citizens Advice Bureau</u>
The Homelessness Service provides £30k per annum to the Citizens Advice Bureau. This is to provide independent advice to those who are homeless or at risk of homelessness. Further discussions with CAB will establish what further assistance they can provide to this client group.

<u>Persons with no recourse to public funds</u>
The HNDA found that "no significant increases in temporary accommodation are anticipated to meet the housing needs of refugees and/or asylum seekers."

Historically there have been very few occasions where the Council has provided services, including temporary accommodation, to persons without recourse to public funds. Where these cases have arisen, the Council has adopted a multi-agency approach which is flexible and which provides advice and assistance, including financial assistance where required in order to safeguard the health and wellbeing of the person and their household if applicable. This approach is now a requirement with accommodation being provided in the short term until a long term solution is found.

The Council recognises the need to further develop its approach to partnership working. All areas identified for development will be progressed. Costs relating to this work will be contained within existing budgets. No additional costs are being requested for these areas of development.

10) Monitoring
The RRTP's produced by each local authority shows an innovative and new approach to dealing with homelessness. Results reported by other local authorities have been positive with high levels of tenancy sustainability. It is therefore vital that appropriate monitoring is carried out to ensure further successes and the council achieves its targets whilst also maximising efficiencies. For this to happen, monitoring will include:
1. Assessing progress on a monthly basis to ensure any targets are being met.
2. The Temporary Accommodation Working Group continuing to meet 3 weekly to assess the requirement for temporary accommodation and to discuss live cases of homelessness.

3.	Continuing to reduce the number of temporary accommodation units to its optimum number.
4.	Continuing to reduce the time taken by homeless applicants from the initial application to being permanently rehoused.
5.	Aiming to reduce the voids re-let times.
6.	Tenants housed by the Housing First process being properly supported and staff promptly addressing any issues as they arise.
7.	Reviewing all Nominations Agreements with RSL's in Moray to ensure agreed quotas are being met and they buy-in to the Housing First process.
8.	Continually updating the training package for staff to manage applicants who are at risk of homelessness and actively aiming to resolve the problem.
9.	Improving our understanding of how poor mental or physical health can exacerbate homelessness and taking steps to address it.
10.	Discussing progress at the 3 monthly RRTP meetings and addressing any shortcomings.
11.	Reporting outcomes to the Housing and Community Safety Committee via the Local Housing Strategy.