

Housing (Scotland) Bill

May, 2024

Housing (Scotland) Bill, Stage

Scottish Women's Aid (SWA) is the lead organisation in Scotland working to end domestic abuse and plays a vital role in campaigning for effective responses to domestic abuse.

SWA is the umbrella organisation for the majority of local Women's Aid organisations across Scotland; each providing practical and emotional support to women, children and young people who experience domestic abuse. The services offered by our members include crisis intervention, advocacy, counselling, outreach, follow-on support and temporary refuge accommodation.

We also run the Scotland's Domestic Abuse and Forced Marriage Helpline taking over 1000 calls, WhatsApp messages, and texts (24h/365) every month.

Hopes for the Housing (Scotland) Bill

We are pleased to see the publication of stage 1 of the Housing (Scotland) Bill, putting the prevention of homelessness at the core of much of the content. The Bill comes with lots of possibility and we are keen to be a part of the progression on offer to women living in Scotland.

We hope the Housing (Scotland) Bill will:

- make the **major improvements to all emergency / crisis response to domestic abuse in terms of homelessness**. Currently too many women are forced to remain with abusers because alternatives, in particular in terms of accommodation provisions and safety measures, would put them (and often their children) at *more* risk.

Where women have approached their Local Authority for help, accommodation is often not available whatsoever, not suitable (close to their abuser or his immediate family, far from their schools, childcare, their GP, etc.), a B&B, or is requiring someone to be in immediate receipt of benefits to meet the high costs.

The current systems often remove dignity and respect from those seeking help, whilst also placing them under significant risk.

- ensure the much-needed change to the legislation and good practice to have a **gendered understanding and response** embedded throughout, in terms of housing and homelessness. The Bill in the current proposed form is not gender competent. We should be leading the way on this as a country and not have this as an afterthought.
- address the all too frequent circumstances where a woman has been a victim of financial or economic abuse; 95% of women experiencing domestic abuse, report experiencing economic abuse¹ and 1 in 3 survivors having to give up their home as a result of domestic abuse². The Bill should both make this scenario difficult to happen, as well as help provide solutions for **survivors to overcome the financial barriers in accessing a new home or retaining their home**, in particular where debts and arrears have come as a result.

¹ https://survivingeconomicabuse.org/wp-content/uploads/2020/11/Statistics-on-economic-abuse_March-2020.pdf

² <https://www.womensaid.org.uk/wp-content/uploads/2019/12/Economics-of-Abuse-Report-2019.pdf>

- provide the legislative push needed to **ensure policies, good practice and an ongoing understanding of domestic abuse** are in place as standard across all landlords and housing providers. We appreciate the measures proposed so far, but do not see that publishing the policies goes far enough. These also need to be implemented, updated and adhered to.
- make the changes to systems and resources so that that women and children who experience domestic abuse can easily **access free domestic abuse-competent legal services**. This should enable victim-survivors to access legal representation in civil and criminal proceedings and to access relevant protective orders.
- **provide housing and accommodation solutions for women who have No Recourse to Public Funds (NRPF)**. We understand that a considerable amount of relative legislation is reserved, and that we cannot undermine that. However, by positioning ourselves to suggest that we can do nothing to help some of the most involuntarily vulnerable people in our society is not good enough. We must look at how, within Scottish limitations, we can ensure women and their children are not in abject poverty as a result of our lack of action.
- choose to use **the unclaimed deposits as a means to part fund 'The Fund to Leave'** in the first instance. Our initial workings from the pilot (soon to be fully understood and reported in an evaluation for the Scottish Government, end of May), demonstrate that a significant amount of the fund was used for deposits for accommodation and moving costs, where women needed to move as part of leaving their abusive partner, preventing women and children from becoming homeless. This crossover would seem to provide a linked, beneficial use of monies.
- **help women who have chosen to be on the anonymous voter registration**, to access the same accommodation / tenancies as those not requiring this; and do so safely.
- **provide legislation (and guidance) that results in a better understanding of domestic abuse; providing the systems and solutions** that result in women and their children being able to leave an abuser without finding themselves at more risk. Where safe, children and women living with abusers should be able to remain in their own homes and abusers be rehoused.

Overall, **ensure the centrality of women's rights to make an informed and supported choice** about their various housing options, and guarantee their access to specialist domestic abuse support and to legal advocacy.

And finally, whilst we recognise it is not a part of the legislation, **the severe lack of housing stock across all Local Authority areas is putting people the lives of women and children at risk every day**. The Housing (Scotland) Bill is only a part of the solution. Without sufficient housing, and in particular, affordable housing, that meets the visions of Housing to 2040 we will fail to eradicate homelessness.

*Women and their children should not become homeless
as a result of domestic abuse.*

Let's do everything possible to put a stop to this across all of Scotland.



Questions

The Scottish Government describe the policy objective of the Bill as:

“The Bill is ambitious in responding to the need to improve the housing outcomes in Scotland for people who live mainly in rented accommodation or face homelessness. At the same time, it continues to safeguard the proportionate use of a landlord’s property for rental purposes, seeking to deliver a fair balance between protection for tenants and the rights of landlords.”

The Bill contains a package of reforms which will help ensure people have a safe, secure, and affordable place to live. It also helps to deliver the Scottish Government’s ‘New Deal for Tenants’ and some aspects of ‘Housing to 2040’, while contributing to the ambition to end homelessness in Scotland.”

Q1. To what extent do you agree that the measures in the Bill meet the Scottish Government’s stated policy objectives?

☐ Strongly agree ☒ Agree ☐ Neither agree or disagree ☐ Disagree ☐ Strongly disagree

Q2. What are your main reasons for your views on Q1?

The Bill contains a considerable number of positive changes. We see merit in the change from 2 months to 6 months to allow for prevention, we welcome the changes in terms of evictions, and we are pleased to see a number of proposals that are specifically addressing some of the current failures in terms of domestic abuse.

However, much of the content still needs considerable work. If you look at Housing to 2040, Action 9: Prevent and end homelessness and eradicate rough sleeping, it states that the Scottish Government will “implement the recommendations from the Scottish Women’s Aid ‘Improving housing outcomes for women and children experiencing domestic abuse’ report³”. We recommend that this document is revisited.

A brief example of some of the recommendations not found within the Bill, but in the report, include:

1. Making women’s homelessness visible: developing a gendered response to domestic abuse and homelessness. By gender analysis, the Scottish Government should develop a plan and timetable to implement the action in the Ending Homelessness Together action plan to ‘carry out and embed a gendered analysis to actions, ensuring the homelessness system meets the needs of diverse groups of women’
2. Equality Impact Assessments (EQIAs): In order to apply a gender analysis to its policies, and ensure the homelessness system meets the needs of diverse groups of women, the Homelessness Prevention and Strategy Group’s (HPSG) RRTP subgroup should –
 - Review guidance for RRTPs to ensure it reflects a gender analysis.
 - Develop an improvement plan for national and local EQIAs of housing strategy and policy.

³ <https://womensaid.scot/wp-content/uploads/2020/12/Improving-Housing-Outcomes-for-Women-and-Children-Experiencing-Domestic-Abuse-Report.pdf>

⁴ <https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2021/03/housing-2040-2/documents/housing-2040/housing-2040/govscot%3Adocument/housing-2040.pdf>

To support the capacity of councils to undertake such analysis, the Scottish Government should invest the necessary resource to embed gender analysis within national and local homelessness policy teams and respective EQIAs.

3. Legal advice: The Scottish Government should ensure that women and children who experience domestic abuse are able to easily access free domestic abuse-competent legal advice and representation.

Overall, we see positive progression, but there are still a number of areas to include; we of course recognise that some of these points will be more applicable to secondary legislation and guidance.

Q3. Do you support the proposals in Part 1 of the Bill allowing rent control areas to be designated?

☒ Yes ☐ No ☐ Don't know

Accessing a rented property, often with additional financial barriers and burden, as outlined elsewhere within this report, is a very difficult task when we consider the rent levels across Scotland just now. We know that the average rents for 2-bedroom properties (the most common size of property in the private rented sector), increased in Scotland by 14.3% in the year to end September 2023⁵, this makes it difficult to expect someone to be able to retain the same property for any length of time, and yet

We see rent controls as a useful tool to minimise some of the risk that comes with this move:

- We agree that there is the ability for caps to be as low as 0%
- We agree with the statutory duty for all local authorities to assess whether or not rent levels are increasing in a local authority
- We are pleased to see that landlords need to advertise the previous rent, and the carrying over of rent control measures from one tenancy to another

If we don't put an end to an ever-increasing rental system, we are simply putting all renters on an inevitable hamster wheel of needing to move time and time again. Thus, placing a burden on mental health and wellbeing and very much against the ethos that is evident throughout the Housing to 2040 piece that demonstrates the importance of your home and community.

Q4. Do you have any further comments to make on Part 1 of the Bill dealing with rent for private tenants?

No comments from SWA.

Q5. What are your views on Part 2 of the Bill that deals with evictions?

- In terms of evictions, we welcome the provisions for delaying evictions; something that could provide a safety net for women, whilst also giving opportunities to collate any evidence if needed, in terms of overturning a decision.

⁵ <https://www.gov.scot/publications/private-sector-rent-statistics-scotland-2010-to-2023/documents/>

- We would ask for the wording in the sections that outline the ‘duty to consider delay’ to also add a section that is highlighting that timings must also consider the risks to tenants who are / have been living with / experiencing domestic abuse.

We recognise that there is a statement reflect antisocial behaviour, but this does not reflect domestic abuse and all elements that come under the definition of domestic abuse.

- We support there being a clear, understandable process that positions the rights of tenants at the heart.

Q6. Do you support the proposals in Part 3 of the Bill to strengthen the rights of tenants to keep pets and make changes to let property?”

☒ Yes ☐ No ☐ Don't know

Q7. Do you have any further comments to make on Part 3 of the Bill dealing with keeping pets and making changes to let property?

SWA is in support of Bill changes to allow tenants to keep pets. Where women (and their children) are moving home, to do so with as little detriment to their family unit as possible is important. Pets should be considered part of the family unit and in many cases, can make the move a much easier transition, in particular where there are children and they are able to keep their pets. This outcome might also reduce further unsafe contact with an ex-partner.

SWA also agrees to the proposal of being able to make changes to let properties. Scotland cannot include rented properties of any tenure as part of the national long-term housing solutions unless these properties are able to become homes. Without tenants being able to make changes, a property remains a property, and not a home. The current decisions have been made with the expectation of changes that reduce the value of a property. However, the reality of this is that most people would make changes to make the place they are living to become a nicer place, not worse.

There is a wealth of research to demonstrate the importance of a home and impact that someone’s physical surroundings have on their wellbeing. The World Health Organisation describes the physical environment as one of the three determinants of health, in fact, “*many factors combine together to affect the health of the individuals and communities*”⁶.

Q8. What are your views on Part 4 of the Bill that deals with how joint private residential tenancies can be ended?

We welcome the improvements for joint tenants to leave a tenancy with sufficient notice without having to wait for the approval of other tenants within a joint tenancy. This removes the fear of eviction.

Though we continue to have concerns for remaining tenants. We are concerned that this law still doesn’t provide greater protections for remaining tenants. Remaining tenants should have the right to propose another tenant; this should not be unreasonably refused by a landlord if the proposed new tenant meets the tenancy requirements (affordability, etc.).

⁶ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9736414/>

Key to success of this Bill is the full implement the Domestic Abuse (Protection) (Scotland) Act 2021 - the Act closes a gap in protection for women and children. It places conditions, including removing suspected perpetrators from households and prohibiting them from contacting or abusing the person at risk; enabling the Scottish Government to meet Article 52 requirements and obligations of the Council of Europe Convention on combating violence against women and domestic violence.

We should highlight that the Domestic Abuse (Protection) (Scotland) Act 2021 also creates a ground on which a social landlord can apply to the court to end the tenancy, or interest in a joint tenancy of the perpetrator and transfer it to the victim. Until this is fully implemented, we will continue to see the priorities and needs of the perpetrator being placed above those of the victim(s). Making this change will not only have significant impact to the wellbeing and life of many women (and their children) across the country, it will also take steps to improving some of the problems with housing stock. In many cases, a Local Authority are would be looking to rehome a single perpetrator, instead a woman with children – and the geographical need to tie into schooling, child care, etc.

We should make it very clear that in these circumstances, we see the need for the perpetrator to be suitably rehomed as an important part of the jigsaw too, without this the risk levels to the victim(s) will be significantly higher.

Q9. Overall, do you support the Bill's proposals in Part 5 of the Bill that deal with homelessness prevention?

☐ Yes ☒ No ☐ Don't know

To clarify our answer to question 9, although we support *many* of the of the homelessness prevention proposals, however we oppose 'Ask & Act' as it is detailed this far. Given that at a recent Homeless Prevention and Strategy (HPSG) meeting, 'Ask & Act' was described by the Minister of Housing as "the cornerstone" to the prevention part of the Bill, wish to raise significant objections. (See below.)

Q10. What are your views on the 'ask and act duty' for relevant bodies in relation to preventing homelessness in Part 5 of the Bill?

We entirely understand the idea behind both the no wrong door approach and having 'relevant public bodies' to have some sort of duty of care placed upon them, in many cases, to ask (and where people agree, act) about a person's housing circumstances, and as outlined, take action to remove their risk of homelessness.

However, the only way for this to be carried out well and to not place further risk to women leaving an abusive relationship, would required a level of both upfront resourcing to increase awareness and knowledge, then continuous knowledge sharing and learning, as well as a significant culture change.

The risk of serious assault and death is highest for a woman as she leaves an abusive relationship. According to the Femicide Census, 38% of women killed by their ex-partner from 2009 to 2018 were killed within the first month of separation and 89% in the first year⁷.

Without part of the running of this model including that every single team member across every single organisation and role has the training, skills and knowledge both upfront and this is then maintained

⁷ https://www.femicidecensus.org/wp-content/uploads/2022/02/010998-2020-Femicide-Report_V2.pdf

at a high level of expertise across all roles, as a country we would be placing women and children at the most extreme risk. We would also be placing extreme pressure upon, already stretched public bodies. The benefit as it is presented just now, does not outweigh the enormous risks.

When we approached our 33 local Women's Aid services about the Ask & Act proposal, there was a unanimous view that it was essential to **"fix the existing homelessness system first to make it work for women, before adding to the process" and that a duty on public bodies would create "another layer of a system that generates exactly what? a referral, to a system that consistently fails women and their children."**

Domestic abuse is the main cause of women's homelessness in Scotland, with a high incidence of repeat homelessness. For many women looking for support, this can mean that they are made homeless by the very services that are meant to help them: forced to leave the family home and then move multiple times. We support the fact that there needs to be changes to address the system that works with women who are experiencing homelessness, but to echo the services across the country, the solution does not sit with an additional route to navigate; the solutions lie in improving the systems already in place. With so much of the solution sat with the availability of housing stock.

We must also consider the Equally Safe Scotland's Strategy. This is in place to eradicate violence against women, setting out which services, most of them public bodies, should provide an appropriate, safe and consistent response which would then support their competence to incorporate a new duty to prevent homelessness. At this stage, this work seems to be missing from the discussions within the homelessness sector. Progressing this would be a positive step in terms of women experiencing homelessness.

Our alternative proposal:

- 1) As noted above, the Scottish Government, alongside experts across relevant sectors, should explore where the needs of women experiencing homelessness and the Equally Safe Scotland Strategy can come together and progress the work already taking place, to ensure homelessness is a part of the Equally Safe, building upon the good practice already happening.
- 2) In addition to the above, we think there is potential to look at a variation on Ask and Act that considers *only* specific places where there has been a form of overnight stay -

We recommend that, where someone has spent at least one overnight in one of the following, then action should be taken to find out someone's housing situation and need and act upon this where relevant:

- Hospital – public or private (unless they are there in a visiting capacity)
- Police or prison cell
- Mental health provision
- Addiction provision

We recommend that further consultations take place across these areas of work to assess where, who and how best to carry out this task, with a likelihood that, for many of the larger institutions, such as hospitals and prisons, this work is carried out by third sector experts in their fields. For example, a hospital could have a well-resourced range of experts covering housing, homelessness, domestic abuse, welfare, throughcare and aftercare, and similar.

In addition to this, this Team can become a well-known part of the place they are based in, ensuring that whether someone is a Paediatrician or a Care Assistant alike, everyone knows some basics connected to the service, and working with a Trauma Informed & DA Informed approach, they are able to arrange for the correct expertise to support the person in relation to their circumstances.

In the hopefully anticipated full roll out of The Fund to Leave, we would look to have links into the fund applications from the relevant places.

Using this approach would also allow for monitoring and recording, as well as ongoing evaluation, much more viable.

- 3) All 'relevant public bodies' have a duty to have policies and good practice in place that ensure their Human Resource / People Teams (or the equivalents) understand and receiving ongoing training about homelessness and domestic abuse, with links into relevant local services; putting a requirement on them as an employer to be aware of homelessness and domestic abuse.

Q11. What are your views on the requirement on councils to act sooner to prevent homelessness by taking reasonable steps in Part 5 of the Bill?

In terms of the definition changing from 2 months to 6 months to allow for more preventative work to take place, SWA deems this to be a positive move and one that will enable someone to be in receipt of support over a longer period of time prior to moving from a property, when this is required. We are currently very aware that welfare payments being paid 5 weeks in arrears, for example, prove to be one of the many hurdles facing women who whilst leaving an abusive relationship. Every case is different, and so there being flexibility within the timeframe for support, should allow a more person centre approach with women.

However, we do have concerns of this leading to the perverse incentive, with 6 months tenancies and shorter temporary measures, almost being seen as good practice. We would therefore underline that, as we approach stage 2 onwards, and in particular, guidance, that there remains a focus on long term and permanent accommodation and not a move to 6-month cyclical outcomes.

Q12. What are your views on the provisions in Part 5 of the Bill that relate to domestic abuse?

Proposed word changes

(5) In section 43 (minor definitions), after the opening words insert—

15 ““abuse” includes—

(a) violence, harassment, threatening conduct, and any other conduct

giving rise, or likely to give rise, to physical or mental injury,

fear, alarm or distress, and

(b) 20

in a case where abuse of a person is from a partner or ex-partner,

abusive behaviour by the partner or ex-partner within the meaning

of section 2 of the Domestic Abuse (Protection) (Scotland) Act 2021 (as read with sections 1 and 3 of that Act);”.

We would advise that section (a) above reads as

‘controlling, coercive, threatening, degrading and / or violent behaviour, including sexual violence, and any other conduct likely to result in mental or physical harm, fear, alarm, or distress, and’.

Pre-action requirement where domestic abuse is a factor in rent

As reported by Women’s Aid England⁸, almost one third of women who left their abusive partner had to turn to credit to do so, while many others were forced to rely on the help of family members or friends. One third of women had to give up their home as a result of leaving their abusive partner. These are only 2 of many statistics demonstrating the huge part that both financial and economic abuse play in terms of domestic abuse, impacting women’s lives often for many years after the relationship.

We are therefore very pleased to see an acknowledgement and solution to one of the impacts on finances in terms of domestic abuse and housing. We agree with the proposal outlined in section 44 that states that a landlord must act where they consider arrears /rent due to be, or partly be, as a result of domestic abuse. Though we would raise our concern that the wording as it stands offers less need for action than we would deem useful. The wording both in terms of landlords understanding what domestic abuse is and acting upon this, with knowledge and expertise, whilst avoiding risk, needs further work.

56A Social landlords: policies about supporting tenants affected by domestic abuse

We are extremely pleased to see this in the legislation. We suggest that the Scottish Government work with ourselves as well as the VAWG sector when looking to develop relevant guidance for this part of the changes.

The Domestic Abuse Section Overall

The Scottish approach to domestic abuse and women’s homelessness must be well considered, well resourced, and understood. It must take the advice of the Violence Against Women & Girls (VAWG) sector, placing the needs of women as core within the legislation, systems, culture and good practice, rather than an addition or side bar. Nothing less is acceptable.

Q13. What are your views on the provisions in the Part 5 of the Bill relating to mobile homes pitch fees uprating?

No comment from SWA.

⁸ <https://www.womensaid.org.uk/wp-content/uploads/2019/12/Economics-of-Abuse-Report-2019.pdf>

Q14. What are your views on the provisions in Part 6 of the Bill relating to fuel poverty?

No comment from SWA

Q15. Do you have any additional comments on the other measures the Bill deals with or any other general comments?

Gender and Equality

Women's and children's homelessness look very different from men's homelessness. Domestic abuse is the single biggest driver for women and children.

As quoted from FEANTSA "Growing international evidence demonstrates that there is a complex, gender-specific dimension to women's homelessness and a gender lens needs to be applied to any strategy that aims to prevent and to end homelessness for women. Gender lens means acknowledging the specific challenges associated with gender and it should be part of any solution to women's Homelessness."⁹

Without taking a gender-based approach, there is a risk of further perpetuating gender-based inequities. We are disappointed that there continues to be no analysis or consideration given as to how a homeless prevention duty will apply across equalities groups. This includes disabled women, BME women, LGBTQ+ women, refugee and asylum-seeking women, older and younger women, and women from deprived and rural areas. We would ask that this is considered as the Bill progresses, and in particular when the guidance is being written.

Equality and non-discrimination should be core throughout the entire Bill. The public sector equality duty of the Equality Act 2010 requires public bodies to address discrimination and promote equality for protected groups, including in terms of sex. As such, local authorities (and public bodies overall) must proactively and routinely tackle inequality in policy development, service delivery and as an employer. This is not reflected in the content of the Bill as it stands.

Why has no equalities impact analysis (EQIA) been carried out as to how a homeless prevention duty would impact equalities groups? Discussion has taken place on this for almost 10 years, with no progress. Without this we are working to no baseline.

We are pleased to see the domestic abuse section in the Bill. However, we cannot have the outcome of this ending up as a paperwork exercise, which it could be. What is needed is a gender-competent approach built on a clear understanding and implementation of non-judgemental, trauma-informed & domestic abuse informed approaches, with systems to reflect such.

NRPF

Across the sector we support NRPF women and children, but with no true solutions in terms of accommodation. We recognise and acknowledge that overall the legislation available to help sits with Westminster. However, we cannot ignore the fact that across the country there are women and children at risk, purely down to a lack of legislation. Until we do so we have a deserving and undeserving poor society. This is not good enough and must be addressed.

⁹<https://www.feantsa.org/public/user/Resources/resources/Guide%20supporting%20and%20solutions%20for%20women.pdf>

Fund to Leave

With almost 62,000 incidents of domestic abuse recorded by Police Scotland¹⁰ and domestic abuse affecting 1 in 4 women in the UK¹¹, it is a fair assumption that when compared to the homelessness statistics, not all women experiencing domestic abuse approach their Local Authority for housing help, and the number of women at risk of homelessness as a result of domestic abuse is much higher than the homelessness statistics portray.

We therefore need to look at alternative ways to address the more hidden homelessness that exists as a result of domestic abuse.

In a similar way to the Personal Budget schemes¹² that started to be used across the homelessness sector from 2010 onwards, access to a relevant fund can be a very positive preventative spend, as well as a way to link people into some support who may otherwise never approach anywhere for advice. With this in mind, as noted elsewhere in this response, we would suggest that the unclaimed deposits are used to part fund 'The Fund to Leave' in the first instance.

Our initial workings from the pilot (soon to be fully understood and reported in an evaluation for the Scottish Government, end of May), demonstrate that a significant amount of the fund was used for deposits for accommodation and moving costs, where women needed to move as part of leaving their abusive partner, preventing women and children from becoming homeless. This crossover would seem to provide a linked, beneficial use of monies.

Young women and domestic abuse

A national research project investigating young women's experiences of unhealthy relationships, domestic abuse and access to support found that over a third (36%) of respondents aged 12 - 25 had been in an intimate relationship with someone who was abusive or harmed them physically or emotionally. Almost three quarters (74%) knew someone who had been in an intimate relationship with someone who was abusive or harmed them physically or emotionally¹³. We would therefore Highlight that the recent changes in terms of youth homelessness, consider and reflect this as we progress - in terms of both knowledge, but also the provisions and solutions.

Suitable accommodation that considers risk

In line with The Homeless Persons (Unsuitable Accommodation) (Scotland) Amendment Order 2020¹⁴ we would ask that Part 5, Duties of relevant bodies in relation to homelessness, section 41 (4) specifies that accommodation is 'suitable accommodation'.

Within the same section it must also be very clear that where an applicant has access to a property, but there is a risk to their safety, that alternative *suitable* accommodation must be secured for them (and their children / dependents) where relevant.

¹⁰ <https://www.gov.scot/news/domestic-abuse-recorded-by-the-police-in-scotland-2022-23/>

¹¹ <https://www.ncdv.org.uk/domestic-abuse-statistics-uk/>

¹² <https://www.jrf.org.uk/housing/providing-personalised-support-to-rough-sleepers>

¹³ Scottish Women's Aid and YWCA Scotland - The Young Women's Movement, national research project report to be published June 2022

¹⁴ <https://www.legislation.gov.uk/ssi/2020/139/contents/made>

Publishing & Availability

We thank you for the opportunity to respond to this. We are more than happy for our response to be published, with names and details.

We are interested and available to give evidence to either the Local Government, Housing and Planning Committee or the Social Justice and Social Security Committee.

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