





# **A WOMAN'S PLACE: GENDER, HOUSING AND HOMELESSNESS IN SCOTLAND**





**“The ache for home lives in  
all of us, the safe place  
where we can go as we are  
and not be questioned.”**

**Maya Angelou**



**“There’s no place  
like home”**

**Dorothy Gale**



Engender is Scotland’s feminist policy and advocacy organisation. We work for women’s economic, political, and social equality with men.

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# 1. INTRODUCTION

Women are largely invisible in housing and homelessness policy across the UK. The extent and nature of women's homelessness is not well understood, and next to nothing is known about the experiences of women who live with multiple forms of inequality. This 'hidden homelessness' means that policy interventions and mainstream services do not cater to women's needs, particularly for those facing multiple economic and social discrimination, including black and minority ethnic (BME) women, disabled women, and older and younger women. Furthermore, this is in the context of a persistent crisis in homelessness in Scotland. Scotland has amongst the strongest rights in Europe for people facing homelessness,<sup>1</sup> yet approaches to date have not been working. Despite high-level attempts to address homelessness over the last twenty years, a Scottish household became homeless every eighteen minutes in 2019.<sup>2</sup> This set of circumstances is interlinked; the blanket lack of gender analysis in both policymaking and interventions across the spectrum of housing perpetuates high levels of homelessness in Scotland.

Women's housing situations rest heavily on their unequal access to resources and safety, whether with respect to pathways into and out of homelessness, as the majority of renters in social housing, or as the minority of homeowners in Scotland.<sup>3</sup> There is a manifest need for an intersectional feminist analysis of housing and homelessness, which can be applied to create policy and interventions that address women's specific needs, and strategic, gendered responses to homelessness. In order to do so, Scottish Government work on housing and homelessness must be well integrated with other policy areas that are crucial in tackling women's inequality, including social security, wider responses to poverty reduction, employability, violence against women, and criminal justice.

Over the last two years, major initiatives have been undertaken by the Scottish Government and the Scottish Parliament to explore best practices in preventing and ending rough sleeping and homelessness. However, women have been all but absent from the discourse. So too has been substantive discussion of human rights and a rights-based approach to housing. Again, these issues are intimately connected. The United Nations Committee on Economic, Social and Cultural Rights has established the right to housing as the right to live somewhere in peace, security and dignity.<sup>4</sup> Fulfilment of this right is clearly not possible without due regard to structural gender equality issues and women's needs.

<sup>1</sup> Shelter Scotland (2019) *Housing is a human right* Shelter Scotland

<sup>2</sup> Shelter Scotland (2019) *Housing and homelessness statistics* Shelter Scotland. Available at: [https://scotland.shelter.org.uk/housing\\_policy/key\\_statistics/homelessness\\_facts\\_and\\_research](https://scotland.shelter.org.uk/housing_policy/key_statistics/homelessness_facts_and_research)

<sup>3</sup> Engender (2020) *Gender Housing and homelessness: A literature review* Engender

<sup>4</sup> United Nations Office of the High Commissioner for Human Rights (1991) *CESCR General Comment No. 4: The Right to Adequate Housing (Art. 11 (1) of the Covenant)* United Nations

This report sets out the international context on the right to housing, summarises key issues for women's equality across housing and homelessness, and explores the extent to which the legislative and policy landscapes in Scotland are gendered. We conclude with findings and recommendations to mainstream gender within housing and homelessness policy frameworks in Scotland.

**NOTE:**

This report is designed to sit alongside a complementary literature review 'Gender, housing and homelessness', which draws out themes on women's homelessness,<sup>5</sup> access to affordable housing, and the differential needs of groups of women who are particularly at risk of housing insecurity. These findings are summarised in chapter 3 of this report.

<sup>5</sup> Engender (2020) *Gender Housing and homelessness: A literature review* Engender

## 2. INTERNATIONAL CONTEXT

### 2.1 HOUSING IN INTERNATIONAL HUMAN RIGHTS INSTRUMENTS

A number of international human rights instruments outline the right to an adequate standard of living, including the right to housing. These date back to the creation of international rights architecture with the Universal Declaration of Human Rights in 1948. As the UK is a signatory to these treaties, both Scottish and UK Governments are committed to upholding the right to housing for all citizens.

International instrument	Year UK ratified	Article on housing
Universal Declaration of Human Rights	1948	25
European Convention on Human Rights	1951	8
International Covenant on Economic, Social, and Cultural Rights (ICESCR)	1976	11
Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)	1986	14(h)
Convention on the Rights of Persons with Disabilities (CRPD)	2009	28

The United Nations (UN) Commission on Human Rights and its successor, the Human Rights Council (HRC), have also repeatedly stressed the right to housing as a component of the right to an adequate standard of living.<sup>6</sup> Most recently, in 2014, the HRC recognised that the security of a home is vital to the enjoyment of other economic, social, civil and political rights.<sup>7</sup>

It has also been established that the right to housing is broader in scope than shelter within bricks and mortar. According to the Committee on Economic, Social and Cultural Rights (CESCR Committee), this includes legal security of tenure against

<sup>6</sup> United Nations Office of the High Commissioner for Human Rights (2019) *Resolutions of the Human Rights Council* United Nations. Available at: <https://www.ohchr.org/EN/HRBodies/HRC/Pages/Documents.aspx>

<sup>7</sup> United Nations Human Rights Council (2014) *Adequate housing as a component of the right to an adequate standard of living* United Nations. Available at: [digitallibrary.un.org/](http://digitallibrary.un.org/)

forced eviction, harassment and other threats; habitability, including facilities essential for health, security, comfort and nutrition; affordability such that the cost of housing must not compromise other basic needs, subsidised by the state where necessary; accessibility, including prioritisation for disadvantaged groups in housing; location that allows access to employment, health and childcare services, schools, and other social facilities; and cultural adequacy such that construction, building materials and housing policies enable the expression of cultural identity and diversity of housing.<sup>8</sup>

These elements do not, however, appear to be central components of Scotland's housing policy or homelessness strategy. To date, there has been no strategic approach to explore how Scotland will fulfil all of its obligations under the right to housing, nor how these strands intersect with women's equality and the needs and experiences of other marginalised groups.

## 2.2 UN OBSERVATIONS: CEDAW, CESCR AND THE SPECIAL RAPPORTEUR ON ADEQUATE HOUSING

UN treaty bodies, made up of committees of independent experts, assess the implementation of human rights instruments internationally. Three assessments in recent years have included findings on the state of housing and homelessness in the UK.

### CEDAW Committee, 2019

The most recent assessment of the UK was conducted by the Committee on the Elimination of Discrimination against Women (CEDAW Committee), which examines the UK on its progress towards protecting and realising women's human rights.<sup>9</sup> In its report of March 2019, it recommended that the UK:

- Address the practice of male landlords offering accommodation to women in return for sex ("sex for rent") by ensuring women in vulnerable situations have effective access to housing;
- Take measures to enable asylum-seeking and refugee women to gain access to employment and appropriate housing;
- Mitigate women's poverty and homelessness by taking effective measures to ensure that the increase in the State pension age from 60 to 66 does not have a discriminatory impact on women born in the 1950s.

<sup>8</sup> United Nations Office of the High Commissioner for Human Rights (1991) *CESCR General Comment No. 4: The Right to Adequate Housing (Art. 11 (1) of the Covenant) and other General Comment* United Nations

<sup>9</sup> United Nations Committee on the Elimination of Discrimination Against Women (2019) *Concluding observations on the eighth periodic report of the United Kingdom of Great Britain and Northern Ireland* United Nations. Available at: [digitallibrary.un.org/](https://digitallibrary.un.org/)

The Committee also raised concern about the disproportionate impact of UK Government austerity measures and cuts to social security on women. Huge reductions in spending on housing, social housing and housing support has been a major element of this programme, with “housing far[ing] worse than almost any government spending area since 2010”.<sup>10</sup>

### **CESCR Committee, 2016**

In 2016, the CESCR Committee released its sixth periodic report on the UK. With respect to housing, this noted concern with:

- Cuts to social security programmes, directly referencing the adverse impact these cuts will have on an adequate standard of living for women;
- The “persistent critical situation in terms of the availability, affordability and accessibility of adequate housing...in part as a result of cuts in State benefits”;
- The lack of social housing that has forced households to move into the private rental sector, which is “not adequate in terms of affordability, habitability, accessibility and security of tenure”.<sup>11</sup>

The report found a significant rise in homelessness primarily impacting “single persons, families with children, victims of domestic violence, persons with disabilities and asylum-seekers”. It also noted a correlation between homelessness and cuts to social security programmes, and called for adequate provision of emergency shelters, hostels and social rehabilitation centres.

### **UN Special Rapporteur on adequate housing, 2013**

In 2013, the UN Special Rapporteur on adequate housing undertook an official visit to the UK. Her final report underscored that the right to adequate housing should not be considered narrowly, but guarantee elements such as security of tenure, affordability, accessibility, and local and cultural adequacy. It too highlights the correlation between UK austerity measures and the right to adequate housing, with a particular focus on disabled people.<sup>12</sup>

The Special Rapporteur quoted concerns of Scottish Ministers regarding the UK Government’s ending of the ‘Right to Buy’ housing programme, including the loss of social housing, pressures on local councils to develop housing stock, and rising costs of home ownership. However, neither the Scottish Government nor the report recognise the related potential impacts on women’s access to housing.

<sup>10</sup> UK Women’s Budget Group (2018) *Housing and gender: Briefing from the UK Women’s Budget Group on the gender impact of changes in housing policy since 2010* UKWBG

<sup>11</sup> United Nations Office of the High Commissioner for Human Rights (2016) *Concluding observations (2016)* United Nations. Available at: [digitallibrary.un.org/](http://digitallibrary.un.org/)

<sup>12</sup> Raquel Rolnik (2013) *Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context* United Nations. Available at: [digitallibrary.un.org/](http://digitallibrary.un.org/)



## 2.3 EUROPEAN FRAMEWORKS AND BREXIT

The forthcoming absence of the European Union (EU) legal framework is a significant cause for concern.<sup>13</sup> The EU's Charter of Fundamental Rights enshrines a range of personal, civil, political, economic and social rights in EU law. This includes the "right to social and housing assistance" for EU citizens and residents. There has been no guarantee that this will be replicated in domestic legislation.

Further concerns over Brexit extend to a shortage of funding once the UK leaves the EU. Between 2014 and 2020, the UK will have received close to €5bn in funding from the European Social Fund (ESF), which was established to help reduce regional inequalities across member states. The ESF can be used to prevent and alleviate homelessness by supporting people who are currently homeless into the labour market, and through skills development and support for people who are at risk of future homelessness.

The ESF is set to be replaced by a UK Shared Prosperity Fund,<sup>14</sup> with the continued aim of reducing inequalities between communities across the UK. However, public consultation on the fund has been pushed back from 2018 to 2020 and very little is known about how the fund will operate, including in terms of allocation to devolved administrations.

<sup>13</sup> Human Rights Consortium Scotland (2017) *Rights at Risk: Brexit, Human Rights, and Northern Ireland* HRCS

<sup>14</sup> WPI Economics (2017) *Homelessness and the Impact of Brexit* Homeless Link

### 3. WOMEN'S INEQUALITY IN HOUSING AND HOMELESSNESS

#### NOTE:

This chapter summarises some of the issues set out in the literature review that accompanies this report. Full references for the information contained in this section can be found in 'Gender, housing and homelessness: a literature review' (Engender 2020).

Despite the longstanding international rights framework on housing, the discourse around women's housing and homelessness remains surprisingly sparse. With the exception of intersections with domestic abuse, mainstream literature, interventions by housing authorities, the work of third sector housing organisations, and policy responses across the UK are all but silent in terms of gender. In part, this is due to a lack of evidence, data and research regarding women's housing and homelessness, alongside a parallel lack of sectoral gender competence that would perceive this as a significant problem. Where limited consideration of gender does exist, this is not placed within the context of the structural gender inequality that shapes women's access to housing. As set out in chapters 4 and 5 of this report, the Scottish policy context has been equally blind to the needs and experiences of different groups of women.

Yet women's experiences of housing are different from those of men. This includes women's pathways into and out of homelessness, interactions with housing services, and access to affordable and adequate housing standards, including the private market. Within this, certain groups of women are more likely to experience housing instability, poor housing, homelessness or negative treatment by housing services, such as BME, disabled and refugee women, women who have been in the criminal justice system, LGBTI (particularly transgender) women, older and younger women, women who sell sex, lone parents and women with other caring responsibilities. These issues are poorly studied and understood. However, a growing body of analysis is addressing women's 'invisibility' in housing policy and women's 'hidden' homelessness. Overall, UK-focused literature suggests that women's housing situation is generally less good than that of men, that they are more likely to have housing affordability problems, and that their specific needs are neither well understood nor appropriately met.<sup>15</sup>

<sup>15</sup> UK Women's Budget Group (2018) *Housing and gender: Briefing from the UK Women's Budget Group on the gender impact of changes in housing policy since 2010* UKWBG

This analysis is set out in detail in the literature review that accompanies this report.<sup>16</sup> Key findings are set out here for reference, and to contextualise the subsequent analysis of the Scottish policy landscape in chapters 4 and 5 below.

### **3.1 STRUCTURAL ANALYSIS OF HOUSING**

Much of the recent literature on housing and homelessness sees housing as a dynamic, non-linear 'continuum' of better to worse housing conditions, with people sleeping rough at one end of a flexible spectrum and those stably housed at the other. As such, homelessness should not be seen as a distinct phenomenon from other forms of housing circumstances, but one manifestation of housing insecurity that is closely interconnected with other forms of instability, socio-economic processes, life events and associated care and support needs. Clearly, such a framework is highly gendered and interlinked with other structural discrimination and inequalities experienced by many women.

Similarly, there has been a shift in analysis of access to safe and secure housing, away from individual circumstances (such as drug or alcohol use, relationship breakdown or mental health), towards structural factors (such as poverty, labour market access, social security policies, and the design of the housing system itself). This focus is well suited to exploring the impact of systemic gender inequality on housing (in)stability.

Women's access to safe and adequate housing is particularly impacted by women's economic inequality and by men's violence against women. To date, however, a lot of the available evidence on women's homelessness is qualitative, and looks at the homelessness pathways and experiences of individual women. The structural nature of women's homelessness has not been adequately explored.

### **3.2 WOMEN'S ECONOMIC INEQUALITY**

As above, the right to housing includes a safe, secure and affordable home. This means legal security of tenure, habitability, affordability, accessibility and a location where access to employment options, health and childcare services and schools is ensured. However, in Scotland and the UK more broadly, this right is not being realised for women.

Access to affordable and adequate housing is profoundly gendered and intimately linked to women's poverty. Women's disadvantaged position in the labour market, including part-time, precarious and/or low-paid employment and unpaid care work, has a direct impact on their housing. Women across the UK are more likely to pay a higher proportion of their income in rent than men, less able to access adequate

<sup>16</sup> Engender (2020) *Gender Housing and homelessness: A literature review* Engender

standards of housing, more likely to live in overcrowded housing or poor conditions, and more vulnerable to housing insecurity.<sup>17</sup> Households made up of single women or lone mothers are overrepresented in poor housing circumstances, with almost half of single mothers in the UK falling below the poverty threshold after housing costs.<sup>18</sup>

### 3.2.1 Social security and social housing

Women are also more likely to be reliant on social security to cover housing costs. Since widespread austerity measures were first introduced in 2010, much of the housing safety net for women has therefore been removed. Cuts include a sharp reduction in overall government spending on housing, reductions in housing benefit rates and eligibility, including the highly controversial 'bedroom tax',<sup>19</sup> and paring back of the size and status of the social housing sector.

These cutbacks have had a hugely disproportionate effect on women. Women in the UK are twice as dependent on social security payments as men, more likely to be in receipt of housing benefit, and more likely to be hit by the bedroom tax. In Scotland, women dominate the Housing Benefit single payment.<sup>20</sup> The Scottish Government has attempted to address this by mitigating the bedroom tax, providing additional crisis grants and extending the Scottish Welfare Fund to include housing benefit for 18-21 year olds. However, little to no analysis exists on the impact this has had on women's access to affordable housing.

In Scotland and the wider UK, social housing has traditionally been a cornerstone of the welfare state, and women's economic inequality has seen women over-represented amongst social renters. In 1999 32% of households in Scotland occupied social housing. This declined rapidly to 23% in 2007 and has remained around that level since. However, related data is not clearly disaggregated by sex, meaning that little is known about the impact of social housing trends on women. This includes key issues around evictions and rent arrears.<sup>21</sup> Similarly, proposed social housing policies tend to look at a net population need, rather than particular needs of women, other marginalised groups, and the intersections between them.

<sup>17</sup> *ibid*

<sup>18</sup> UK Women's Budget Group (2019) *A home of her own: housing and women* UKWBG

<sup>19</sup> The 'bedroom tax' is a cut to Housing Benefit and/or Universal Credit for recipients of working age renting in the social housing sector, if they are deemed to be occupying a larger property than necessary. It is also known as the underoccupancy rule, or social sector size criteria.

<sup>20</sup> In 2012, women made up 69% of the caseload for those aged under 35, 55% for those aged 35 to 69, and 72% for those aged over 70. Scottish Government (2013) *The gender impact of welfare reform* Scottish Government

<sup>21</sup> A 2019 report by Shelter Scotland highlights the continued use of evictions by social landlords as a way of dealing with rent arrears. The reports notes particular impacts of this trend on children but does not mention women.

### 3.2.2 Adequate housing standards and women's specific needs

Adequate housing standards are integrally linked to women's economic inequality. Women's capacity to secure housing that meet Scottish Housing Quality Standards is undermined by lesser access to resources and by gendered roles that see women undertake the majority of unpaid care work. As above, UK and Scottish Governments are also committed to provision of housing that allows access to employment options, healthcare services, schools, childcare centres and other social facilities (upon which unpaid carers clearly depend).

In the UK and elsewhere, households headed by women are more likely to live in overcrowded homes, substandard homes or homes of 'poor quality' than those headed by men. Research also highlights a disproportionate negative impact of poor quality housing on women. For instance, a correlation has been found between poor quality, flatted and overcrowded housing, and low levels of mental health and emotional wellbeing among women and children.<sup>22</sup>

However, evidence around women and men's differential access to type and quality of housing is minimal. Regardless of whether women live in households including men, they may have distinctive housing needs based on caring roles, lower wages, and greater risk of domestic abuse, which "could affect housing needs in terms of location, tenure, built form, design, cost, housing-related support and other features."<sup>23</sup> Yet very little detail is known about these aspects of women's needs. Meanwhile, whilst decent bodies of literature examine the housing needs of, for example, LGBTI, disabled, or older people, very little if any of this literature applies a gender analysis. Little to nothing is therefore known about the differential needs or preferences of specific groups of women.

### 3.2.3 Access to the private market

Market-dominated housing policies tend to disadvantage women, particularly female-led households. Closely linked to the gender pay gap, there is a gender property gap in terms of women's ability to rent and buy homes, and the proportion of women's income spent on rent. On average, women have lower incomes and less capital than men, and are therefore more likely to be renters or in less advantageous housing circumstances on the private market.

In England, women in the private rented sector spend an average of 55% of their income on rent, compared with 36% for men. Across a lifetime, this leaves women with much less disposable income, more difficulty saving for a deposit, and less

<sup>22</sup> Scottish Health and Inequalities Impact Assessment Network (2013) *Health Impact Assessment of Housing Improvements SHIIAN*; Gabe et al (1993) 'Women, crowding and mental health' in Burridge R, Ormandy, D. (eds) *Unhealthy housing: research, remedies and reform* Taylor & Francis

<sup>23</sup> UK Women's Budget Group (2018) *Housing and gender: Briefing from the UK Women's Budget Group on the gender impact of changes in housing policy since 2010* UKWBG

financial security. The impact of the gender pay gap on home ownerships is just as stark. For example, a woman on the median income applying for a mortgage based on the average (mean) house price will need to borrow 15.4 times their salary, compared with a figure of 10.1 for men.<sup>24</sup> Across the UK, 10% of single women hold mortgages compared with 17% of single men,<sup>25</sup> whilst twice as many single male parents seeking to buy a property in Scotland are able to access a loan or mortgage as single female parents.<sup>26</sup>

In the UK and Scotland, where homeownership is seen as the ideal and is a main source of wealth accumulation (and wealth inequality), this has a number of impacts on women's financial, social and physical health and wellbeing. The UK Women's Budget group estimates that, primarily due to differences in homeownership rates, by the time people reach their late 60s in the UK, the median man has £100,000 more wealth than the median woman. Despite this, policy recommendations regarding private sector housing in the UK contain little, if any, specific gender analysis, and are unlikely to help women to access the housing market.<sup>27</sup>

### 3.3 WOMEN AND HOMELESSNESS

Historically, the issue of homelessness has tended to be viewed as a primarily 'male' phenomenon. However, across Europe increasing numbers of young women, single women, women who have experienced violence, and women with children are entering homeless services. The most recent statistics from the Scottish Government show increases in homeless applications from women, both as the main applicant for the household and as single women. There has also been a rise in applications from households with children and where the main reason given is domestic abuse.<sup>28</sup>

Women's experiences of homelessness, and pathways in and out of homelessness, are significantly affected by their gender. There is increasing recognition that different structural and individual factors push men and women into homelessness. These include health, safety and wellbeing impacts of homelessness, gendered experiences with homelessness support services, and different barriers to resolving housing crises. Gendered factors such as women's poverty, health, conflicts and crises related to unpaid caring, experiences of violence, abuse and exploitation, bereavement, imprisonment, and pregnancy and motherhood all heavily influence women's journeys into, through and out of homelessness. Much of the available research also suggests that women tend to have shorter episodes of 'absolute

<sup>24</sup> Women's Housing Forum (2019) *Women, money and housing report 2019* WHF

<sup>25</sup> Anna Cottrell (2019) *Single women excluded from home ownership* Real Homes

<sup>26</sup> Scottish Government (2005) *Scottish Household Survey* Scottish Government. Available at: <https://www2.gov.scot/Topics/Statistics/16002/PublicationAnnual>

<sup>27</sup> UK Women's Budget Group (2018) *Housing and gender: Briefing from the UK Women's Budget Group on the gender impact of changes in housing policy since 2010* UKWBG

<sup>28</sup> Scottish Government *Homelessness statistics* Scottish Government. Available at: <https://www.gov.scot/collections/homelessness-statistics/>

homelessness', or sleeping rough, than men - in part because they take additional, extreme measures to avoid street sleeping - but that many women have been homeless on multiple occasions, moving in and out of homeless services over prolonged periods.

These structures and experiences are also heavily influenced by other inequalities faced by women. For instance, women from minority ethnic groups are over-represented among hostel and B&B residents, the proportion of BME women turned away from domestic violence refuges is higher than for white women, and trans women are vulnerable to negative treatment and harassment when accessing housing services.

### 3.3.1 Women's hidden homelessness

Women's experiences are still notably absent from mainstream discourses on homelessness. This is partly due to women's 'hidden' homelessness: women are missing from analysis and data because the nature of their homelessness does not conform with the traditional (male) images of 'rough sleeping' in the streets. According to most UK sources, single men continue to dominate the numbers of those sleeping rough and using mainstream shelter systems.<sup>29</sup>

Women experiencing housing precarity and intolerable housing circumstances, on the other hand, often go to great lengths to find alternate, temporary and often volatile accommodation. This less visible homelessness includes sharing with family or friends on an informal and temporary basis, sleeping in bed and breakfast hostels, 'sofa surfing', sleeping on floors or in overcrowded spaces, and (re)entering into relationships with potentially abusive partners.

It is also likely that women do sleep rough in relatively high numbers, though still in ways that make them less visible. One study found that rough sleeping was in fact the most common housing situation for single women when they first entered homelessness. However, these women occupy public space differently to rough sleeping men, employing strategies of invisibility to stay safe(r), such as avoiding busy areas, sleeping in secluded sites like public toilets, garages, bin bays, abandoned cars or staircases, or simply disguising their homelessness status. Likewise, large numbers of women in precarious housing situations do not engage with homeless services, partly due to perceived stigma and shame and because homeless services are not designed for women and do not understand or respond to their needs. Thus women are rendered invisible in statistics as well as in the streets.

Another key area of women's invisibility is motherhood. Much of the gendered analysis that does exist considers either single women or households headed by

<sup>29</sup> Engender (2020) *Gender Housing and homelessness: A literature review* Engender



women. The latter category tends to exist within analysis of child homelessness, which often disconnects the mother's situation from that of the child, rendering the mother's homelessness hidden.

All of this means that policies, legislation and responses to homelessness remain dominated by and orientated towards the experiences of men, and very few homelessness services respond to women's multiple needs and disadvantages.

### 3.3.2 Women at risk: domestic abuse and other factors

A large body of evidence shows domestic abuse as a major cause of women's homelessness in Scotland, with high proportions of homeless women reporting domestic abuse as either a chronic factor in their lives or as an immediate precipitating factor in homelessness. The experience of homelessness can also render women more vulnerable to further violence. In addition, homeless women are more likely to have experienced greater levels of sexual abuse and emotional abuse than men in childhood, as well as into adulthood. The impact of homelessness resulting from domestic abuse creates cumulative and long lasting health problems for women and children.<sup>30</sup>

In Scotland, domestic abuse has risen from the fourth to the third most common reason given for a homeless application, and is the main reason given for women applicants. However, these figures are still likely to significantly underestimate the scale of the problem. Women may not disclose that they are experiencing domestic abuse when making a homeless application, or may not present to services as homeless at all.

Other groups of women who are particularly at risk of homelessness include women who sell sex, refugee women and women exiting the criminal justice system. Scottish Refugee Council research indicates that 96% of refugees experience homelessness at some point after receiving refugee status. A St Mungo's study revealed that almost half of their female (homeless) clients had an offending history, with over a third having spent time in prison, and that women are more likely than men to lose accommodation whilst in custody. Meanwhile, women who sell sex on the street constitute one of the most excluded and marginalised groups within the homeless population in the UK,<sup>31</sup> with a clear and reciprocal link between selling sex and homelessness. Housing options can cause women selling sex to become homeless, which in turn can lead women to sell sex.

<sup>30</sup> Scottish Women's Aid (2015) *Change, Justice, Fairness: Why should we have to move everywhere and everything because of him?* Scottish Women's Aid

<sup>31</sup> Kesia Reeve (2018) *Women and homelessness: putting gender back on the agenda* People, Place and Policy 11:3 DOI:10.3351165-174; Batty et al (2010) *On the Streets: Sex Workers and Homelessness* Gender Perspectives on Homelessness: Homeless in Europe. Pages 26-28



Research has shown ‘survival sex’<sup>32</sup> to be a key subsistence strategy for single homeless women.<sup>33</sup>

### 3.3.3 Housing interventions and policy

Homeless women’s access to suitable short-term shelter and medium-term transitional housing services is shaped by the lack of a gendered approach and a severe lack of gender competency among housing providers. This is despite the fact that existing literature demonstrates a clear need to tailor housing support to diverse groups of women and offer women options when it comes to housing, including with regard to experiences of domestic abuse, and that the vast majority of women accessing housing services have multiple, complex needs that are not well served by current responses.

With regards to domestic abuse, lack of experience and knowledge among housing sector staff emerges as a critical issue, both in generic and specialist services. Scottish Women’s Aid found that local authority staff questioned the validity of women’s experiences of abuse and homelessness, and failed to challenge their partner’s entitlement to remain in the family home or offer safe alternatives to moving out (e.g. tenancy transfer or additional home security).<sup>34</sup>

Meanwhile, homelessness policy needs to be better integrated with wider housing policy and practice, as well as with broader government strategies to tackle gender inequality. Women’s ability to successfully exit homelessness and sustain housing is negatively impacted by a host of structural issues that the Scottish Government seeks to address, including access to the labour market, women’s financial insecurity, delayed and inadequate social security payments, long waiting lists for specialist services (e.g. mental health, drug or alcohol treatment), and systemic institutional and cultural sexism.

## 3.4 INTERNATIONAL GOOD PRACTICE

A small number of international examples show how consideration of gender can be incorporated into both urban planning and the planning and design of new homes.

The City of Vienna has developed a comprehensive manual on gender mainstreaming in urban planning and development, which includes criteria to evaluate the gender equity and suitability of new housing projects. These include

<sup>32</sup> ‘Survival sex’ refers to women having to sell sex in order to afford their basic needs, including food, shelter and clean clothes.

<sup>33</sup> Rionach Casey, Rosalind Goudie & Kesia Reeve (2008) *Homeless Women in Public Spaces: Strategies of Resistance* Housing Studies 23:6 DOI:10.1080/02673030802416627

<sup>34</sup> Scottish Women’s Aid (2015) *Change, Justice, Fairness: Why should we have to move everywhere and everything because of him?* Scottish Women’s Aid

clearly organised entrance zones, allowing for contact (sight or earshot) with surrounding flats, barrier-free access to outside areas, natural lighting for corridors and staircases, attractive playrooms for children, and sufficiently dimensioned and conveniently located storage rooms for bicycles and prams. The criteria are designed to pursue the goals of, inter alia, facilitating housework and family tasks, promoting good-neighbourly contacts, safety of movement even at night, a good range of social infrastructure facilities, and economical and flexible flat layouts offering options for women with lower incomes.<sup>35</sup>

A similar project in rural New South Wales, Australia looked at the housing-related aspirations of older women who were not homeowners. It identified the need for green space and the ability to accommodate visiting family members as priorities for older women.

However, most of the gendered literature focuses on pathways into homelessness, and doesn't consider the planning, decision-making and budgeting end of the housing spectrum at all. Likewise, there is little to suggest that gender is considered within Scottish or UK housing planning or development, or that women are being involved in designing or developing affordable, suitable housing models. Beyond the analysis available from the UK Women's Budget Group, gender is rarely if ever mentioned in discussions of national housing budgets.

<sup>35</sup> Vienna Ahead (2013) *Gender mainstreaming in urban planning and urban development* City of Vienna

## 4. SCOTLAND'S HOUSING FRAMEWORK

The legislative framework for housing and homelessness in Scotland dates to 1977, with the introduction of the Housing (Homeless Persons) Act, followed by the Housing (Scotland) Act 1987. The latter includes the following within its definition of homelessness: 'a person is also homeless if he/she has accommodation but cannot reasonably occupy it, for example because of a threat of violence'. The heavily disproportionate impact of the threat of violence on women, however, is not recognised. The 1987 Act also places certain duties on local authorities that correspond with elements of the right to adequate housing established by the UN CESCR Committee. They are required to provide accommodation with cooking and laundry facilities, and during development of housing provision they must consider the artistic quality in the lay-out, the beauty of the landscape or countryside, and other amenities in the locality. Local authorities are also legally bound to consider the special needs of chronically sick or disabled persons. Since 1987, at least 34 pieces of legislation or guidance have been issued by the Scottish Government on housing.<sup>36</sup> These include the Homelessness etc. (Scotland) Act 2003, which provides that anyone assessed as being unintentionally homeless has a right to settled accommodation. This domestic framework is perceived one of the most progressive in the world.<sup>37</sup>

Cumulatively, this framework requires local authorities to provide temporary and settled accommodation, and housing support for those in need, as well as advice and information for households experiencing or at risk of homelessness. Local authorities also have a duty to develop strategies to alleviate homelessness. The Social Housing Charter and Scottish Housing Regulator govern how homeless services are delivered, and how social housing is managed. Separate statutory guidance sets out how social housing providers should allocate social housing. Very little of this statutory and non-statutory framework gives due consideration to gender or women's equality.

### 4.1 HOUSING LAW AND GENDER

Some aspects of housing law in Scotland incorporate gender concerns, with respect to domestic abuse, pregnancy and motherhood. The Housing (Scotland) Act 2001 places a duty on local authorities to produce homelessness strategies that are compatible with their domestic abuse strategies. The Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014, which defines unsuitable accommodation

<sup>36</sup> Indigo House (2018) *Scotland's transition to rapid re-housing: Market area analysis, legislative and culture review* Social Bite

<sup>37</sup> Shelter Scotland (2019) *Housing is a human right* Shelter Scotland

in terms of the CESC Committee parameters on habitability and location, decrees that pregnant women and families with children can only be housed in temporary accommodation that does not meet these requirements for a maximum of 14 days. This was reduced to a maximum of seven days with an Amendment Order in 2017. In 2019, the SNP committed to new legislation that will allow police to issue Emergency Protective Orders in cases of alleged domestic abuse. This followed sustained advocacy to this end from Scottish Women's Aid, and is set to be introduced by the end of the parliamentary term.

In addition to primary legislation on housing, 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. This means that public authorities responsible for housing must proactively and routinely tackle gender inequality in policy development, service delivery and as an employer. In practice, however, the public sector equality duty is poorly applied and enforced.<sup>38</sup>

## 4.2 SCOTTISH GOVERNMENT GUIDANCE

The primary Scottish Government guidance on the topic of housing and homelessness consists of the Homelessness Prevention Guidance (2009), Housing Options Guidance (2016) and Local Housing Strategy: guidance 2019. Social landlords are also bound by the Scottish Social Housing Charter (2017), which covers both local authorities and housing associations.

### 4.2.1 Guidance documents

With the exception of the Housing Options Guidance, which is entirely gender-blind, key guidance documents cover a number of issues related to domestic abuse. The Homelessness Prevention Guidance highlights the requirement for a joint, multi-agency approach to ensure the needs of those affected by domestic abuse and homelessness are effectively addressed, as well as the particular usefulness of multi-agency training. It states that social landlords should review allocation and transfer policies to ensure they meet good practice, and rent arrears and repairs procedures to ensure they do not unfairly penalise victim-survivors of domestic abuse. The guidance also covers the need to work with specialist support agencies like Scottish Women's Aid.

Similarly, the Local Housing Strategy guidance makes references to Equally Safe: Scotland's strategy for preventing and eradicating violence against women and girls, the Equally Safe Delivery Plan, and the importance of working with Violence Against Women Partnerships. It also encourages local authorities to consider the good practice guide on domestic abuse for social landlords, which was developed by

<sup>38</sup> Coalition of equalities organisations (2017) *Scottish Government consultation on the Socio-economic Duty: Equality sector response* Engender

Scottish Women's Aid and a number of partnership organisations.<sup>39</sup> It should be noted that this was produced to fill a clear gap in Scottish Government's own guidance, and should now be formally incorporated in statutory guidance.

Secondary guidance documents also make links between insecure housing and domestic abuse. For instance, the Guidance on Meeting the Best Interests of Children Facing Homelessness (2010) recognises that domestic abuse can lead to repeat homelessness, a disruption in schooling and employment, as well as loss of contact with support networks. Social Housing Allocations in Scotland: A practice guide (2019) links to the Equally Safe strategy and highlights the importance of close working with Women's Aid groups.

Guidance on housing and homelessness does not, however, reflect issues around women's equality, housing and homelessness in any context other than domestic abuse. As discussed, these include a host of issues related to women's economic equality and access to adequate housing, as well as links with wider structural gender inequality and social policy areas.

#### **4.2.2 Scottish Social Housing Charter**

The Scottish Social Housing Charter includes a general equalities outcome. This commits social landlords to ensuring that the individual needs of tenants and other customers are recognised, and that access to housing and housing services is "fair", regardless of characteristics that are protected under the Equality Act. Oversight of this is provided by the Scottish Housing Regulator (SHR), which recently published an Equalities Statement for 2019-2022. This outlines the duties and requirements social landlords must fulfil, and plans to improve SHR's promotion of equality in the coming years. These include gathering evidence of the equality impact assessment process, and full compliance with equalities legislation. If done well, this could help to drive better decision-making and outcomes for women across the social housing sector.

### **4.3 HOUSING PROGRAMMES AND SERVICES**

Local authorities are responsible for applying Scottish housing law and delivering housing programmes and services. In the first instance, local authorities are required to publish a Local Housing Strategy (LHS) that covers homelessness prevention, housing of all tenures, and housing-related services and housing support. Each LHS must identify outcomes over a five-year period and detail actions required to meet intended objectives. Under the Equality Act, each local authority is legally required to undertake an equality impact assessment to inform development of their LHS.

<sup>39</sup> ALACHO, CIH, SFHA, Scottish Women's Aid (2019) *Domestic abuse: A good practice guide for social landlords* CIH

### 4.3.1 Rapid Rehousing Transition Plans

Local authorities are now also required to produce Rapid Rehousing Transition Plans (RRTPs), as part of the new rapid rehousing planning framework.<sup>40</sup> These five-year plans, running from 2019 to 2024, sit alongside the Local Housing Strategies and must be reviewed on an annual basis. The vision for rapid rehousing is three-fold:

1. A settled, mainstream and sustainable housing outcome as quickly as possible
2. Reduced time in any form of temporary accommodation
3. When temporary accommodation is needed, it should be mainstream, furnished and within a community.

The rapid rehousing policy does not apply to those with ‘multiple needs beyond housing’. For individuals who present with complex needs or ‘severe or multiple disadvantage’ (SMD), the Housing First approach is the proposed first response (see section 4.3.3). However, SMD in the context of housing is not clearly defined in either the commissioned analysis of rapid rehousing,<sup>41</sup> or the guidance document for RRTPs.<sup>42</sup> The former lists domestic abuse under an exemplary cluster of “problems that appear together in the lives of people facing disadvantage”, whilst the latter does not include domestic abuse or make any explicit link to gendered issues in its consideration of SMD in Scotland. Yet, single females are more likely to have a support need than any other household type. In 2018-19, 57% of single female applicants were assessed as having a support need in the homeless application process, with 31% indicating an issue with mental health.<sup>43</sup>

Indeed, the guidance document for RRTPs is entirely gender-blind. It does not mention the gendered nature of housing and homelessness, nor does it require plans to be tailored to the needs of women. The minimum requirement is for local authorities to develop an equality impact assessment as part of each RRTP. This is far from encouraging, however, as women’s sector analysis of compliance with the public sector equality duty and of individual EQIAs has revealed the standard to be extremely low.<sup>44</sup> If completed in the first place, EQIAs routinely fail to identify the most basic and readily accessible information regarding gender equality and the subject in question and/or are undertaken post-hoc or in parallel to the policy design.

<sup>40</sup> Scotland’s rapid rehousing approach emerged from the work of the Homelessness and Rough Sleeping Action Group (see section 5.2).

<sup>41</sup> Indigo House (2018) *Scotland’s transition to rapid re-housing: Market area analysis, legislative and culture review* Social Bite

<sup>42</sup> Indigo House (2018) *Rapid Rehousing Transition Plans: Guidance for local authorities and partners* Indigo House

<sup>43</sup> Scottish Government (2019) *Homelessness in Scotland: 2018-19 – Equalities breakdowns* Scottish Government. Available at: <https://www.gov.scot/publications/homelessness-scotland-2018-19-equalities-breakdowns/>

<sup>44</sup> Close the Gap (2015) *Making Progress? An assessment of public sector employer performance of the public sector equality duty* Close the Gap

All of this means that particular circumstances experienced by women related to temporary or rapid rehousing have been overlooked. For instance, temporary housing in secure refuge accommodation is often a vital first step for women experiencing domestic or sexual abuse. Women who are separated from their children, often as a result of domestic abuse, can be prevented from regaining custody through overnight stays if they are allocated unsuitable housing.<sup>45</sup> Given analysis that rapid rehousing should not be applied in a blanket way for young people,<sup>46</sup> the comparatively high incidence of young women's homelessness (see section 5.1) should also be explored in the context of short-term temporary accommodation solutions.

The first round of RRTPs was due for submission to the Scottish Government by the end of 2018. It has not been possible within the scope of this report to evaluate these and no systematic reviews have been found to do so. However, some local authorities have begun to report on tensions between the imperatives of rapid rehousing and the need for specialist refuge accommodation for women experiencing domestic abuse.<sup>47</sup> A quarter of local authorities have still not submitted an EQIA with their RRTP.<sup>48</sup>

### 4.3.2 Housing Options

At the operational level, local authorities currently implement their approaches to prevent homelessness through a practice known as Housing Options. Individuals seeking assistance with housing-related issues are provided with advice on options, such as council housing, housing association homes and private rented accommodation. This frontline practice intends to also provide support for underlying issues to homelessness such as debt, relationship breakdown and mental health problems. As discussed, such factors such as these that impact on housing insecurity are significantly gendered. However, Housing Options guidance is gender-blind, and frontline housing practitioners in Scotland are not trained in the gender equality issues that shape their clients' experiences and needs.

### 4.3.3 Housing First

Housing First is an international approach that emerged in response to traditional models that expect homeless individuals to address underlying causes of homelessness (such as mental health problems or substance abuse issues) before being offered long-term housing. The Housing First model aims to offer settled housing with wrap-around support for those that want it as the first step in the housing process, rather than the last. Following the work of the Homelessness and

<sup>45</sup> Méabh Savage (2016) *Gendering Women's Homelessness* Irish Journal of Applied Social Studies 16:2 DOI:10.21427/D7KB0X

<sup>46</sup> Homelessness and Rough Sleeping Action Group (2018) *Transforming the use of Temporary Accommodation in Scotland* Scottish Government

<sup>47</sup> Anecdotal evidence from Women's Aid groups in Scotland.

<sup>48</sup> Scottish Government (2020) *Ending Homelessness Together Action Plan: Annual report to Parliament* Scottish Government



Rough Sleeping Action Group and Scottish Parliament Local Government and Communities Committee (see sections 5.2 and 5.3), there is now high-level Scottish Government commitment and cross-party support for Housing First, as part of the broader emphasis on rapid rehousing.

To date, however, there has been no focus within Housing First Scotland on identifying or including the complex and multiple support needs of women facing homelessness. The Housing First monthly tracker reports do not include information on tenancies disaggregated by sex or other protected characteristics, and it is unclear whether this data is collected. This lack of a gender focus should now be addressed within current review of the Housing First Strategy, the ongoing work of the five Pathfinder cities,<sup>49</sup> and planned academic evaluation of the programme.<sup>50</sup>

## 4.4 DATA COLLECTION AND STATISTICAL REPORTING

Local authorities in Scotland are responsible for collecting data regarding homelessness and housing options services. This information informs policymaking by Scottish Government and forms the basis of a set of biannual reports on housing and homelessness. The substantive content of this data collection, including what is not included, and the subsequent framing of statistics is assumed to be gender neutral.<sup>51</sup> This, however, is far from the case. Information that is collected is then interpreted and presented for publication by Scottish Government, undergoing a further filter of aims, (lack of) knowledge, and institutional and/or individual biases. All of this has an enormous impact of women's invisibility in housing and homelessness, and shapes the discourse and policymaking significantly.

### 4.4.1 Homelessness and housing options

Each person who makes an application for housing assistance is allotted an identifying number by local authorities, enabling them to track households and individuals through the homelessness system, and a number of different forms are used for data collection. The HL1 return is made at the time of a homeless application, and collects the sex, age and ethnicity of the main applicant and their partner if applicable. In 2013, the form was updated to improve the options pertaining to ethnicity. The HL1 also collects information on eligibility for assistance, which includes response options on refugee status or ineligibility for assistance. This format is replicated in the PREVENT1 form, which monitors approaches by individuals for housing support and records homelessness prevention activities.

Unfortunately, however, the HL1 does not capture any data on disability, sexual

<sup>49</sup> These are: Aberdeen/shire, Dundee, Edinburgh, Glasgow and Stirling.

<sup>50</sup> Homeless Network (2019) *Housing First Scotland: The story so far* Housing First Scotland

<sup>51</sup> The term 'gender-neutral' is used to refer to an activity that does not have a differential impact on women and men. This could be a policy, service or activity such as collecting data.



orientation, or trans status. For disabled people and unpaid carers, for whom appropriate housing is essential, the only approximately relevant place to register an issue related to physical needs is under 'reason for failing to maintain accommodation', where 'physical health reasons' is listed as an option. PREVENT1, which aims to improve homelessness prevention, includes the option 'Accommodation unsuitable – Mobility/ Adaptation issues' within a section on 'reasons property may longer be suitable/ available in the future'.

This lack of broader equalities data means that intersectional analysis of women's housing and homelessness is not possible in Scotland. For instance, it is not known how many homeless applications in Scotland are made by disabled women or LGBT women. This creates a further series of gaps in the analysis, and renders the experiences of particular groups of women even less visible in housing and homelessness policy and interventions. Planned review of homelessness data collections, from the point of view of protected characteristics,<sup>52</sup> should also consider update of HL1 options to more accurately reflect women's experiences of homelessness. This would include aligning the 'reasons for application' with Scottish Government's understanding of domestic abuse as coercive control, as set out in the Domestic Abuse (Scotland) Act 2018.

#### 4.4.2 Temporary accommodation

With the HL2 return, local authorities report on a quarterly basis on the total number of applications received and processed for homeless households, and on those currently housed in temporary accommodation. This latter is broken down by the overall number of households, households with pregnant women or dependent children, and dependent children, as well as by the type of temporary accommodation occupied. The HL2 also records the number of households with pregnant women or dependent children in unsuitable accommodation and the number in breach of the Homeless Persons (Unsuitable Accommodation) Order 2014. This methodology reflects a trend in data collection on housing, homelessness and wider social policy measures. Gathering information at the household level, without including sex-disaggregated data, means that the extent of women's homelessness in temporary accommodation is masked. The focus on the number of dependent children in temporary accommodation hints at a hidden population of women, as single parent families are both more likely to live in poverty and to be headed by women.

Finally, the HL3 tracks the use of temporary accommodation by individuals. Information gathered includes the type of accommodation offered, accepted or rejected, and the length of time spent within it, as well as whether housing was

<sup>52</sup> Scottish Government (2019) *Homelessness in Scotland: 2018-19 – Equalities breakdowns* Scottish Government. Available at: <https://www.gov.scot/publications/homelessness-scotland-2018-19-equalities-breakdowns/>

unsuitable and/or in breach of the 2014 Order. Again, women's presence behind the data is inferred through their pregnancy or motherhood, rather than directly. Equality data is not gathered, and women who are not mothers are therefore not expressly tracked. However, the forms are linked to the original HL1 homeless application, meaning that, in theory, sex-disaggregated data could subsequently be collated and made an area of focus by Scottish Government analysts.

#### 4.4.3 Scottish Government statistical releases

In addition to the hard data collected, the ways in which this information is collated, interpreted and published have a significant impact on women's invisibility in policy and discourse on housing and homelessness. This is exemplified by Scottish Government's reporting based on the datasets outlined above. These take the form of biannual releases on 'Homelessness in Scotland' and an annual update 'Housing Options (PREVENT1) Statistics in Scotland'.

Although direct or comprehensive analysis based on the sex and age of both applicants and/or applicants' partners is possible within the confines of the data collected, Scottish Government has not presented this information within any of the publications accessible through their archive.<sup>53</sup> The Housing Options bulletins are gender-blind, and only particular aspects of women's homelessness are revealed in the Homelessness in Scotland series. Each issue provides information on selective cohorts by sex and age, and sex and household type, and on 'households with pregnant women and dependent children'. Women are also referenced implicitly in terms of motherhood and domestic abuse.

For instance, the Homelessness in Scotland bulletin from June 2019 cites a number of statistics that are likely to relate to women, but without signposting them as such. Children are repeatedly referenced without mention of their primary caregivers, who are significantly more likely to be women. The main reasons given for homelessness are also referenced, including both violent and non-violent disputes, but without analysis of household characteristics, including gender.

The onus is therefore on others to delve into the dense spreadsheets that are made public alongside the narrative reports for a coherent picture on gender equality issues. It follows that neither the homelessness nor housing options publications break down the data to explore other protected characteristics, such as the number of applications from black and minority ethnic women or refugee and asylum-seeking women. (Given data collection methods, there are no statistics available regarding disabled or LGBT women's homelessness.)

<sup>53</sup> Available at:

<https://www.webarchive.org.uk/wayback/archive/20190503045643/https://www2.gov.scot/Topics/Statistics/Browse/Housing-Regeneration/RefTables>

As a result of this framing of housing and homelessness, the headline issues that are highlighted by Scottish Government's own press releases on their publications, and subsequently picked up by the media, third sector bodies and others do not include issues relating to gender equality or the experiences of diverse groups of women.

#### 4.4.4 Homelessness in Scotland – equalities bulletin

Following engagement with women's groups regarding these issues,<sup>54</sup> Scottish Government has committed to a new bulletin on equalities and homelessness. The first of these was published in November 2019.<sup>55</sup> However, issues with the interpretation and presentation of data remain. The space dedicated to providing an overall picture on gender, ethnicity and age (those protected characteristics currently recorded in homelessness statistics) is contained within a small number of paragraphs, very little intersectional information is included,<sup>56</sup> and gender continues to be viewed from the perspective of homelessness as primarily a male problem.

For instance, the summary of main points regarding homeless applications includes two bullet points on single males, one on the reduction in youth homelessness, and a final one on female applications in the context of domestic abuse. The first of these highlights that 45% of applications came from single male households, without providing context that, in total, only just over half (54%) of main applicants were men. Instead, this is stated (from the male perspective) in the dedicated paragraphs on gender. A second area chosen for particular comment is single male rough sleeping, illustrated by two statistics,<sup>57</sup> without reference to other groups. By contrast, the information presented on domestic abuse includes the fact that a violent or abusive dispute within the household is given as the reason in 5% of applications from male main applicants.

As above, data collection presently only allows for statistics to be broken down by sex, ethnicity and age. However, a review to consider whether other characteristics should also be collected is planned for the future. This review should include consideration of what equalities data is included in future bulletins and how this is interpreted and presented.

<sup>54</sup> Other equalities groups may also have highlighted the need for published data on protected characteristics.

<sup>55</sup> Scottish Government (2019) *Homelessness in Scotland: 2018-19 – Equalities breakdowns* Scottish Government. Available at: <https://www.gov.scot/publications/homelessness-scotland-2018-19-equalities-breakdowns/>

<sup>56</sup> The bulletin notes that applicants of Asian, Asian Scottish or Asian British ethnicity are most likely to state the reason for their homelessness as a violent or abusive dispute within the household. This accounts for 41% of the applications from women in these groups, as opposed to 22% of women in total.

<sup>57</sup> 74% of those who slept rough in the three months before making their application were single males, 78% of those who had done so the night before making their application were single males.

## 5. HOUSING AND HOMELESSNESS POLICY IN SCOTLAND

In 1999, the Scottish Executive established a “Homelessness Taskforce” on preventing and tackling homelessness. The group presented a radical platform of reform in 2001. However, despite the range of legislative, policy and operational measures that were put forward, a homelessness crisis in Scotland persists twenty years later. Whilst there has been an overall downward trend in homelessness statistics over the last decade, latest annual data indicates a three percent increase in applications from the previous year and, in 2019, a household became homeless every eighteen minutes.<sup>58</sup>

Homelessness has therefore become a renewed focus over recent years, both within the Scottish Government and Scottish Parliament. In its Programme for Government 2017-18, Scottish Government established the Homelessness and Rough Sleeping Action Group, and committed £50 million to an ‘Ending Homelessness Together’ fund, with the aim of ending rough sleeping and transforming the use of temporary accommodation. This was followed by publication of the ‘Ending Homelessness Together: High Level Action Plan’, in November 2018 and the first annual progress report, published in January 2020. Alongside government activity, the Local Government and Communities Committee of the Scottish Parliament conducted an inquiry into homelessness in Scotland, releasing a report that set out recommendations for government in February 2018.<sup>59</sup>

Unfortunately, women’s broad invisibility in data collection and analysis on housing and homelessness has largely tracked through to Scotland’s policy framework on these issues. Until very recently, none of these programmes of work by the Scottish Executive, Government or Parliament have taken a gendered approach, and women’s equality and women’s needs have been ignored in policy development and emerging models focused on improving services and preventing homelessness.

### 5.1 WOMEN’S HOMELESSNESS IN SCOTLAND

The latest annual statistics on homelessness in Scotland were released by Scottish Government in June 2019. As described above, the main publication provides selected sex-disaggregated data, but no narrative gender analysis or overall figures on women’s homelessness. These snapshots include the fact that 21% of all

<sup>58</sup> Shelter Scotland (2019) *Housing is a human right* Shelter Scotland

<sup>59</sup> Local Government and Communities Committee *Report on Homelessness* Scottish Parliament. Available at: <https://digitalpublications.parliament.scot/Committees/Report/LGC/2018/2/12/Report-on-Homelessness#>

applications were made by single women, compared with 45% for single men, and that 80% of applications from single parents (accounting for a further 21% of the total) were from women. The commentary does not highlight the fact that this is a comparatively low number of female lone parents seeking help from homeless services, given that over 90% of lone parents are women (and that these women are more likely to live in poverty than male counterparts).

Meanwhile, comparative analysis of data tables over time shows that women have accounted for between 45% and 49% of main homelessness applicants since comparable records began in 2002.<sup>60</sup> One of the most striking aspects of the sex-disaggregated data is that women tend to become homeless at a younger age than men. In 2018-19, 56% of applications from 16-17 year olds were from young women. Over time, young women continue to be a majority of recorded homeless 18-24 year olds, before male counterparts become the majority of main applicants in all other age brackets. This reflects an observable trend in other countries, but has never been highlighted in the Scottish Government's bulletins on homelessness.

As discussed above, however, no matter how the data is presented, much of women's homelessness continues to be hidden by definitions of homelessness, unequal access to services, and a focus on particular aspects of women's experiences, such as pregnancy, motherhood and domestic abuse.

## 5.2 HOMELESSNESS AND ROUGH SLEEPING ACTION GROUP

The Homelessness and Rough Sleeping Action Group (HARSAG) was commissioned by the Scottish Government in October 2017 to produce short- and long-term solutions to end homelessness and rough sleeping.

The group released two interim reports ("Ending Rough Sleeping in Scotland" and "Transforming the use of Temporary Accommodation in Scotland") and a final report ("Ending Homelessness") that consolidates its recommendations. Each of these comment on certain groups requiring specific responses to homelessness and temporary accommodation, including women who experience domestic abuse. Notably absent, however, is integrated reference to Equally Safe: Scotland's strategy for preventing and eradicating violence against women and girls. Equally Safe speaks specifically to the links between gendered abuse, violence and homelessness, and underlines the requirement for work on violence against women to be interlaced with other Scottish Government strategies, programmes and frameworks.

<sup>60</sup> Scottish Government (2019) *Homelessness in Scotland: 2018-19 – Equalities breakdowns* Scottish Government. Available at: <https://www.gov.scot/publications/homelessness-scotland-2018-19-equalities-breakdowns/>

The only other references made to women in HARSAG's work are the restrictions on temporary accommodation for pregnant women set out in the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014.

Yet, a number of highly gendered issues are examined within the reports without recognition of the potential impacts on women and girls. A focus on LGBT youth, refugees and people with no recourse to public funds represents a missed opportunity to explore the specific barriers and issues experienced by refugee and asylum-seeking women, and LGBT young women and girls. Likewise, discussion of the impact of social security cuts on adequate and sustainable housing does not reflect the crucial intersection with women's economic inequality. A set of recommendations related to Universal Credit is made,<sup>61</sup> but consequences of the single household payment system on women are not explored. This lack of gender analysis is all the more striking given the mention of women who experience domestic abuse in HARSAG's three reports, and the volume of evidence from third sector organisations on the financial abuse stemming from the Universal Credit single household payment.<sup>62</sup>

Finally, HARSAG recommended changes to data collection regarding people who are either rough sleeping or at risk of rough sleeping across Scotland. However, there is no focus on ensuring that sex-disaggregated data and information on other equalities groups is gathered.

## 5.3 SCOTTISH PARLIAMENT COMMITTEE ON LOCAL GOVERNMENT AND COMMUNITIES

In 2017, the Local Government and Communities Committee launched an 11-month study into homelessness in Scotland. Its final report was based on a trip to Finland to learn about the Housing First approach (see section 4.3.3), as well as written and oral evidence from individuals, third sector organisations and local councils.

### 5.3.1 The call for evidence

Overall, the 64 responses to the committee's call for evidence reflect the lack of a gendered approach and focus on issues experienced by women across the housing sector in Scotland.<sup>63</sup> When the committee took oral evidence, gender and other equalities did not play a central role in the testimony given or questions asked by the Committee.

<sup>61</sup> "With the introduction of Universal Credit, deduction rates for advances, arrears, overpayments and all other third party deductions should be reduced; exemptions for the Shared Accommodation Rate need to be extended; and the 5-week waiting time needs to be removed as this creates arrears right from the start"

<sup>62</sup> UK Women's Budget Group, End Violence Against Women, and Surviving Economic Abuse (2018) *Universal Credit and financial abuse: Exploring the links* UKWBG

<sup>63</sup> All submissions are available at:

<http://www.parliament.scot/parliamentarybusiness/CurrentCommittees/104826.aspx>

Submissions by women’s organisations highlighted this gender-blind approach to homelessness, and an insufficient understanding of the gendered nature of domestic abuse amongst both frontline staff and policymakers. Homeless Action Scotland welcomed links made between domestic abuse and homelessness in Equally Safe, but encouraged a broader gender-based violence approach in housing to consider homophobia, transphobia and sexual violence. It called for better linkages between violence against women services, the homeless sector and LGBT organisations. Homeless Action Scotland also referred to its research findings that homeless women are being exploited for sex in return for protection.<sup>64</sup> Legal Services Agency referenced young women in their submission, noting a “soar” in the number of young women who are rough sleepers.

Twelve submissions were made by local councils, of which five referred directly to women. These included the number of homeless applications stemming from women experiencing domestic abuse, the challenge of linking up services, such as healthcare, for homeless pregnant women, and unintended consequences of reducing the statutory number of days a person can spend in temporary accommodation, such as the disruption and distress additional moves may cause pregnant women.

### 5.3.2 The Committee’s report

The report was published in February 2018, with a set of recommendations for Scottish Government. Given the Committee’s lack of focus on equalities issues, it is not surprising that gender and other protected characteristics are not weaved throughout the report. A handful of references to women or gender issues include recognition of gender-based violence as a major cause of homelessness, and issues with Housing Options services for women experiencing domestic abuse. There is only one subsequent recommendation that pertains directly to women – that the Housing Options toolkit produced by the Scottish Government “provides frontline staff with the full knowledge and skills to provide advice and support in all circumstances, including those with specific requirements, such as those with protected characteristics and genderbased [sic] violence.”<sup>65</sup>

The Scottish Government subsequently committed to a Housing Options Training Toolkit that “incorporates all relevant aspects of housing advice and information, including diversity, equalities legislation and knowledge transfer on gender based [sic] violence and abuse”.<sup>66</sup> This commitment has since been incorporated in the

<sup>64</sup> Homeless Action Scotland (2017) *Evidence, Homelessness in Scotland, What next?* Homeless Action Scotland

<sup>65</sup> Local Government and Communities Committee *Report on Homelessness* Scottish Parliament. Available at: <https://digitalpublications.parliament.scot/Committees/Report/LGC/2018/2/12/Report-on-Homelessness>

<sup>66</sup> Minister for Local Government and Housing (2018) *Scottish Government Response to Local Government and Communities Committee Report on Homelessness* Scottish Parliament



‘Ending Homelessness Together: High Level Action Plan’ (see section 5.4 below). The toolkit is still under development, however the first annual report on the action plan describes training “on areas of housing, employability, health and wellbeing, and income and affordability”, without mention of equalities or gender issues. Meanwhile, proposals to support development of the toolkit from Scottish Women’s Aid have not been picked up, and there is concern that this opportunity to improve service provision for women will be missed.

## **5.4 ENDING HOMELESSNESS TOGETHER: HIGH LEVEL ACTION PLAN**

The Scottish Government published the ‘Ending Homelessness Together: High Level Action Plan’ (the action plan) in November 2018. It was co-produced with CoSLA and third sector organisations, and responds to HARSAG’s 70 recommendations to prevent and end homelessness in Scotland. Given the lack of gender analysis throughout HARSAG’s work, it is unsurprising, though by no means inevitable, that the action plan also failed to focus on women’s homelessness.

The action plan is structured around five high-level aims, to end homelessness by:

1. Embedding a person-centred approach across our public services
2. Preventing it from happening to people in the first place
3. Prioritising settled housing for all
4. Responding quickly and effectively whenever it happens
5. Joining up planning and resources

All of these approaches immediately point to gendered imperatives and suggest avenues for exploration of gender equality issues. It is not possible, for example, to embed a person-centred approach without taking into account the specific realities and diversities of women’s lives, or to respond effectively to homelessness when women’s homelessness and insecure housing is hidden and poorly understood.

However, none of the original 49 actions that seek to achieve these goals were focused on women’s needs or gender equality. Once more, limited references to women throughout the report pertain to those experiencing or ‘fleeing’ from ‘domestic violence’ or domestic abuse. Clearly this is a vital strand of work. However, as outlined in this report, a wider approach to women’s homelessness that is rooted in an understanding of systemic gender inequality is also needed. Numerous opportunities are being missed due to the lack of gender mainstreaming throughout the action plan.



The action plan does recognise the need to look at equality concerns across protected characteristics in a sixth section on ‘Other actions to support the work’. These include a set of actions regarding improved data collection, and the use of equality impact assessment (EQIA) going forward. This is better than nothing, but exemplifies the current misuse of EQIA that is common across Scottish public bodies. A thorough EQIA should have been undertaken in order to inform the content of the action plan, and indeed the previous work by HARSAG.<sup>67</sup> This would have revealed a range of issues regarding women’s homelessness, including those set out in chapter 3 of this report and in more detail in the accompanying literature review, and should have prompted a range of suitable actions to take. It would also have led to the integration of equality issues throughout the plan, rather than in a standalone section that promises future consideration of the impacts (of a course of action that has already been decided upon) on women and other protected groups.

## 5.5 ENDING HOMELESSNESS TOGETHER: HIGH LEVEL ACTION PLAN ANNUAL REPORT

Throughout development of HARSAG’s work, and since the publication of its reports and the High Level Action Plan, women’s organisations have warned that the lack of analysis and proposed interventions regarding gender equality and women’s needs will exacerbate women’s marginalisation in housing and homelessness services in Scotland.

In response, the Scottish Government has engaged with stakeholders, in an attempt to address the gaps. As a result, a suite of new commitments within the first Ending Homelessness Together annual report include three that are focused on women’s equality.<sup>68</sup> These are discussed below. A new annex on women’s homelessness has been added, and ‘next steps’ ascribed to six of the 49 existing actions also flag the need to consider women’s perspectives.<sup>69</sup> However, on the whole, the action plan remains ungendered at present.

### 5.5.1 ‘To apply gendered analysis to actions, ensuring the homelessness system meets the needs of diverse groups of women’

We are very pleased to see this overarching commitment to review all existing actions from a gender perspective. This has real potential to improve the homelessness support system for women in Scotland. However, implementation will

<sup>67</sup> HARSAG noted in its first report that an EQIA will be “taken on these recommendations”, in consultation with Scottish Women’s Aid and LGBT Youth Scotland. This did not occur.

<sup>68</sup> Scottish Government (2020) *Ending Homelessness Together Action Plan: Annual report to Parliament* Scottish Government

<sup>69</sup> As in the original plan, women are also mentioned within the action on prevention pathways, the second of which is on domestic abuse.

be key to whether this potential is delivered. Significant time and resource will be required to rigorously undertake full gender analysis of all elements of this work, and this must be accounted for in planning and budgeting. Too often, commitments to mainstream gender in Scottish Government strategies or policy frameworks have failed to transpire, as a result of underestimating the task in hand. Experts in gender, housing and other equalities areas, as well as a diversity of women with experience of the housing system should be involved in this gendering of the existing action plan. Scottish Government should assess options for how this could be best achieved, including collaboration with external consultants, whilst retaining a focus on building gender competence internally.

However, applying a gender analysis to an established action plan that is rooted in a long, gender-blind process will not, on its own, ensure that the homelessness system meets the needs of diverse groups of women. For this to be achieved, a separate process targeted at identifying the particular and diverse needs of women will be crucial. We recommend that this action is split in two, and a separate commitment focussed on the requirements of diverse groups of women, structural gender inequality, and intersectionality is created (see section 5.5.4).

Finally, it should be borne in mind that retrofitting women's equality considerations to work that is already well underway is a limiting and suboptimal approach to gender mainstreaming. Whilst we remain optimistic about the value of the exercise, we urge Scottish Government to invest capacity and resources in this process as a matter of priority.

### **5.5.2 'To improve outcomes for women experiencing domestic abuse'**

Appropriately, prevention of homelessness for women and children experiencing domestic abuse is the stated focus of this new action. However, detail on how Scottish Government "will seek to adopt housing advice, Housing Options and housing management actions" in pursuit of this goal, or how this strand of work will differ from that undertaken within the domestic abuse prevention pathway, is not set out.

'Next steps' are identified as "ensur[ing] relevant actions are progressed" with regards to recently published guidance on domestic abuse for social landlords.<sup>70</sup> This was produced by a partnership of third sector organisations including Scottish Women's Aid. It is now vital that this guidance is incorporated in Scottish Government's Homelessness Prevention guidance and legal requirements are developed for local authorities.

<sup>70</sup>ALACHO, CIH, SFHA, Scottish Women's Aid (2019) *Domestic abuse: A good practice guide for social landlords* CIH

We recommend that Scottish Government works closely with Scottish Women's Aid to develop thinking on the further initiatives needed to improve outcomes for women experiencing domestic abuse, as well as ongoing work on emergency barring orders, guidance for social landlords and other activities of the domestic abuse prevention pathway.

### **5.5.3 'To support the homelessness system to respond more appropriately to the shared needs of mothers and children'**

Evidently, the shared needs of mothers and children are a critical part of the puzzle when considering women's experiences of homelessness and the systems that seek to support them. However, there is an urgent need for women's hidden homelessness - including but not limited to that of mothers and pregnant women - to be addressed and for women's homelessness to be understood within the wider context of gender inequality.

### **5.5.4 Further action: Ensure that housing and homelessness interventions work to prevent women's homelessness and meet the needs of diverse groups of women**

At present the action plan is narrowly focused on two aspects of women's housing insecurity: motherhood and domestic abuse. We are concerned that this runs the risk of overlooking the systemic gender analysis that is needed to get to grips with women's invisibility in policy and discourse on homelessness. There is a clear need to establish what further interventions would work to prevent women's homelessness and meet the housing needs of diverse groups of women, in addition to gendering the existing action plan. Such work should be rooted in an understanding of structural gender inequality and include a focus on the many women who live with multiple inequalities, including disabled women, women from black and ethnic minority communities, refugee and asylum-seeking women, LGBT women, older and younger women, and women from deprived and rural areas.

We recommend that a working group is established to develop this activity. As there would be elements of overlap with commitments elsewhere in the action plan, such as building evidence on the homelessness experienced by people with protected characteristics, such a group could potentially also support or oversee the commitment to apply gender analysis across the existing action plan.

### **5.5.5 Further action: Invest in research on women's housing and homelessness**

The retroactive gendering of this action plan will not suffice to create policy and interventions that take account of women's experiences of housing and homelessness. Too little is known about the trajectories and needs of women in housing instability, particularly with regards to disabled women, BME women, the

young women overrepresented in homelessness statistics, and other marginalised groups.

To help establish how homelessness prevention can be improved for diverse groups of women, in addition to making the system more responsive to their needs, the Scottish Government should invest in a programme of research on women's housing and homelessness.

We recommend that such a programme includes an overarching focus on structural gender inequality and intersections with other forms of inequality and discrimination, as well as the following elements:

- The impact of recent policy, budgeting and economic changes on women's housing status in Scotland, particularly with regard to tenure type and relative security of housing, living standards and location of housing;
- Homeless women's experiences of services, including domestic abuse services, and assessment of how integrated these are with other more gender-informed services;
- Analysis of the comparative effectiveness of different policy approaches for women in particular, including temporary shelter, specialist support services, and social housing and private sector access schemes;
- Access and suitability of housing services for single women and female headed households;
- Longitudinal studies on women's pathways into securing long-term sustainable housing;
- Gender-sensitive, affordable housing design models, the role women are playing in community-led housing projects, and any impacts this has on the nature of the housing environment established.

#### **5.5.6 Further action: Support for local authorities**

There is also a need for Scottish Government to provide support to local authorities regarding their gender analysis of homelessness and housing options. There is no evidence of existing gender competence across local authority housing teams. Indeed, workers from Women's Aid groups in Scotland report resistance from both local authorities and housing associations on the need, even, for a gendered domestic abuse strategy. A quarter of local authorities did not submit the legally required equality impact assessment with their Rapid Rehousing Transition Plan, and assessment of EQIAs at local level suggests that those that were completed are unlikely to have informed development of the RRTP itself. Without resourced support, it is difficult to see how local authorities will increase their capacity on gender equality issues.

## 5.6 HOMELESSNESS PREVENTION AND STRATEGY GROUP

The Homelessness Prevention and Strategy Group (HPSG) was reconvened in 2016,<sup>71</sup> to take forward actions that work towards ending homelessness in Scotland. It now leads on the delivery and monitoring of the High-Level Action Plan. HPSG is chaired by the Minister for Local Government and Housing, and co-chaired by CoSLA's Community Wellbeing Spokesperson. Its membership derives from leading third sector organisations across housing and homelessness in Scotland. One equalities organisation, LGBT Youth Scotland, is represented. Review of the minutes of HPSG's quarterly meetings shows that gender equality in the context of homelessness has not been considered by the group.<sup>72</sup>

HPSG's current focus includes proposals regarding a Personal Housing Plan model that will build on the Housing Options approach, development of the public sector homelessness prevention duty, and how to best target the Homelessness Prevention Fund announced in Scottish Government's last Programme for Government. A short-life working group, the Prevention Duty Review Group, has been convened to develop recommendations to Scottish Government on the proposed prevention duty, and is due to report in June 2020. All of these strands of work have clear gendered implications, and it is vital that the new duty is designed to interact with the public sector equality duty (itself under review). Engagement with gender equality experts should be urgently sought by the HPSG and prevention duty group, and membership of both reviewed accordingly.

## 5.7 HOUSING TO 2040

The Scottish Government has also been developing work to establish 'how our homes and communities should look and feel in 2040'. An initial discussion paper, 'Housing Beyond 2021' was published in 2018. This made no mention of women, gender or equality. Following extensive stakeholder engagement, and a rebrand as 'Housing to 2040', draft vision and principles were published in July 2019.<sup>73</sup>

The stakeholder engagement report reflects two comments regarding women that were made by delegates. Firstly, a proper gendered analysis of how the housing system works and the disadvantages faced by women is needed. Secondly, real

<sup>71</sup> The group was initially formed in 2009 as the CoSLA/Scottish Government 2012 action group. It was renamed as HPSG in 2014, and did not convene between January 2017 and March 2018.

<sup>72</sup> Women are referenced twice in minutes that date to 2016: A Scottish Government official references work on women's homelessness that is "led by the Cabinet Secretary", and in discussion of the domestic abuse pathway "the Group agreed that while the majority of victims are known to be women, the needs of other groups including male victims" must also be taken into account. Available at: <https://www.gov.scot/groups/homelessness-prevention-and-strategy-group/>

<sup>73</sup> Scottish Government (2019) *Housing to 2040: A vision for our future homes and communities* Scottish Government

efforts to close the gender pay gap are needed to ensure sustainable incomes for all. Scottish Women's Aid is also listed as an organisation that took part. Unfortunately these points are not picked up in 'Housing to 2040: A vision for our future homes and communities', which is also gender-blind. The draft principles are based around the themes of a well-functioning housing system, high-quality sustainable homes, sustainable communities, and homes that meet people's needs. However, none of this can be achieved without due consideration of the housing needs of women. As consultation on this process continues, the views of diverse groups of women, gender experts and wider equalities experts should be actively sought.

## 6. CONCLUSION AND RECOMMENDATIONS

A home is the basis of stability and security. It is the epicentre of social, emotional and economic lives, and provides the grounds on which an individual can become capable of claiming and exercising all of their rights. For many women, however, a stable, affordable and habitable home remains out of reach.

At present, women's homelessness is not seen in the context of wider social and economic inequalities. There is little acknowledgment by government, parliament, political parties or third sector organisations of women's social and economic inequality across discussion of homelessness in Scotland. There has been no consideration of factors that entrench women's economic inequality, or the role of women as primary caregivers and those providing long-term unpaid care. Whilst the impact of social security cuts is often noted, the disproportionate impact on women is not.

Likewise, legislative and policy initiatives have been developed in virtual absence of consideration of women's social and economic inequality. Within recent policy and operational frameworks, the extent to which women's inequality is considered is limited to domestic abuse, pregnancy and motherhood. Absent entirely from the housing and homelessness landscape in Scotland are the realities of women who face multiple discrimination, including disabled women, women from black and ethnic minority communities, refugee and asylum-seeking women, LGBT women, younger and older women, and women from deprived and rural areas.

## 6.1 RECOMMENDATIONS

### The right to housing

#### 1. Incorporate all elements of the right to housing into Scots Law

Scotland is held up for its “world-leading legislation” regarding housing and homelessness.<sup>74</sup> However, current legislation and policy fall short of meeting the standards set out in human rights instruments on the right to adequate housing. As such, Scottish Government should ensure that the right to housing is incorporated into Scots Law with any Scottish Bill of Rights that is introduced following the work of the National Taskforce for Human Rights Leadership.

#### 2. Build an intersectional evidence base on women’s right to housing

There is very little information on how the right to housing applies across equalities groups. This includes disabled women, BME women, LGBT women, refugee and asylum-seeking women, older and younger women, and women from deprived and rural areas. Scottish Government should work with third sector organisations to build an evidence base on how the right to housing could be realised for diverse groups of women.

### Gender analysis

#### 3. Include gender experts in strategy and policy forums

Gender experts have been and continue to be absent from strategy and policy processes in housing and homelessness. The voices of women’s organisations, and those committed to the realisation of the rights of disabled women, LGBT women, older and younger women, and refugee and asylum-seeking women should be included at decision-making tables. As a first step, membership of the Homelessness Prevention and Strategy Group and Prevention Duty Review Group should be reviewed and extended to include expertise on gender equality.

#### 4. Ensure robust equality impact assessments

The quality of equality impact assessments (EQIA) conducted on housing strategy, policy and programmes must be improved both nationally and locally. As a starting point, we recommend that national strategies and policies, Local Housing Strategies and Rapid Rehousing Transition Plans are reviewed to determine the extent to which EQIAs have shaped Scotland’s housing framework. Work by the Scottish Housing Regulator to gather evidence on social landlords’ compliance with equalities legislation could potentially feed into such a process.

<sup>74</sup> Shelter Scotland (2019) *Housing is a human right* Shelter Scotland



## **5. Invest in gendered research**

The intersections between women's inequality, housing and homelessness remain poorly studied and understood. We recommend that Scottish Government invests in a programme of research on women's housing and homelessness, which includes a focus on structural gender inequality, and intersections with other forms of inequality and discrimination.

## **6. Support gender competence building in local authorities**

Local authorities lack the gender competence needed to apply gender analysis across their role as policy setters and service providers with regards to homelessness and housing options. Without resourced support, it is difficult to see how capacity on gender equality issues at the local level can be increased. We recommend that an action to explore how this should be achieved is included in the homelessness action plan.

## **Data**

### **7. Update homelessness data collections**

There are significant gaps in homelessness data. The planned review of data collections on protected characteristics is both vital and overdue. Beyond this, nor are many aspects of women's homelessness captured by existing data collections. It is recommended Scottish Government consult on what data could better represent the diverse experiences of rough sleeping and homeless women, as part of a wider Equalities Data Strategy. Updates to reflect current understanding of domestic abuse as coercive control are also recommended.

### **8. Improve reporting on homelessness equalities data**

The new 'equalities breakdown' bulletin on homelessness in Scotland is welcome. However, the format must seek to present a comprehensive picture on issues for women and other protected characteristics. The review of homelessness statistics should therefore also include consideration of what existing equalities data is included in future bulletins and how this is interpreted and presented.

## **Housing interventions**

### **9. Review Rapid Rehousing and Housing First from a gender perspective**

The rapid rehousing approach, including local authorities' Rapid Rehousing Transition Plans should be reviewed from an intersectional gender perspective. Adequate equality impact assessment was never undertaken. Similarly, current review of the Housing First Strategy, ongoing work of the five Pathfinder cities and academic evaluation of the programme should include a focus on gender equality. A full equalities breakdown of those currently accessing services, and a focus on the multiple and complex housing needs of diverse groups of women are urgently needed.

## **10. Update Housing Options training and guidance**

Gender equality and women's issues related to housing have not been integrated across the Housing Options service. The Housing Options Training Toolkit must be updated to include a focus on structural gender inequality, including access to resources and safety, and diverse women's experiences of housing and homelessness. The Housing Options Guidance should be reviewed and updated accordingly.

## **11. Integrate gender equality in Housing to 2040**

The draft vision and principles for Housing to 2040 are gender-blind. As consultation on this process of planning for sustainable housing continues, it is vital that women stakeholders are able to contribute. The views of diverse groups of women, gender experts and wider equalities experts should be actively sought by Scottish Government.

## **Homelessness**

### **12. Mainstream gender rigorously across the homelessness action plan**

It is vital that the commitment to apply gender analysis across 'Ending Homelessness Together' is implemented rigorously. This is a considerable task that will take significant time and resource to accomplish. Scottish Government should explore options for engaging expert advice to support this activity, including collaboration with external consultants.

### **13. Update Homelessness Prevention Guidance**

The Homelessness Prevention Guidance makes a number of recommendations relating to domestic abuse. It does not, however, cover issues related to women's economic equality or links with wider structural gender inequality and social policy areas. We recommend that this guidance is reviewed from a gender equality perspective. It should also be updated to incorporate 'Domestic abuse: a good practice guide for social landlords', and ensure that statutory duties are developed for local authorities.

### **14. Develop housing and homelessness systems that work for women**

At present 'Ending Homelessness Together' is narrowly focused on two aspects of women's homelessness: motherhood and domestic abuse. Scottish Government should now also include a commitment to develop a programme of work focussed on housing and homelessness interventions that prevent women's homelessness and respond to the needs of diverse groups of women and girls in Scotland.

## SUMMARY OF RECOMMENDATIONS

1. Incorporate all elements of the right to housing into Scots Law
2. Build an intersectional evidence base on women's right to housing
3. Include gender experts in strategy and policy forums
4. Ensure robust equality impact assessments
5. Invest in gendered research
6. Support gender competence building in local authorities
7. Update homelessness data collections
8. Improve reporting on homelessness equalities data
9. Review Rapid Rehousing and Housing First from a gender perspective
10. Update Housing Options training and guidance
11. Integrate gender equality in Housing to 2040
12. Mainstream gender rigorously across the homelessness action plan
13. Update Homelessness Prevention Guidance
14. Develop housing and homelessness systems that work for women



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