

Response to Scottish Government's Consultation on the legal enforcement of the Temporary Accommodation Standards Framework (TASF)

Question 1: Do you think the physical standards set out in the TASF are appropriate and sufficient to ensure that temporary accommodation provides an adequate, safe and secure space for the household?

Answer

Yes, we agree that the physical standards are appropriate and sufficient subject to our comments below. We also note that many of the physical standards are already enshrined in law in terms of the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014 (UAO).

Where appropriate we have commented on particular aspects of the physical standards with reference to the UAO:

A. Accessible accommodation that is able to meet the needs of any disabled person within the household

Article 4(b) of the UAO provides that accommodation is unsuitable if it is not suitable for occupation by a homeless household considering the needs of the household.

In the case of *X v Glasgow City Council*, the UK Supreme Court held that Article 4(b) was a process duty that only requires the local authority to take the needs of the household into account. It does not necessarily require a local authority to meet those needs.

We therefore welcome the inclusion of a legally enforceable standard of accessible accommodation that must meet the needs of any disabled person within the household.

We note however that Scottish Government Guidance for the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014 (as amended) on Article 4(b) states: "Article 4(b) has been amended to apply to all homeless households and extended to ensure the suitability needs of vulnerable people are met" (paragraph 3.3).

Given the apparent difference between the UKSC's interpretation and the above stated policy intention that Article 4(b) that the needs of vulnerable people are met (not merely considered), we would suggest that to ensure enforceability of this legal standard, Article 4(b) should be amended to read:

"accommodation is unsuitable if it does not meet the needs of the household."

According to Scottish Government statistics on homelessness 2024-25, 7% of households assessed as homeless or threatened with homelessness had a physical disability, 5% had a learning disability, and 30% had a mental health problem.

Whilst these statistics do not reflect the position of all homeless households in Scotland, they are indicative of a significant cohort who have a disability or potential disability.

It is therefore critical that the standard and reference to accessibility is not limited to just physical accessibility but considers mental impairments and other needs, as well as the nature and type of accommodation to meet the needs of the homeless household.

Indeed, in our experience the nature and type of accommodation is often relevant to whether that accommodation meets the needs of disabled persons. For example, a person with a mental health disability and having suffered trauma may be adversely impacted if they are accommodated somewhere with shared facilities. Vulnerable homeless persons may also have needs not arising out of a disability, but which should be met for temporary accommodation to be suitable. An example that we encounter in our casework are individuals who are in recovery from substance misuse and therefore require accommodation that is not shared with others who are using drugs or alcohol.

Further, we are aware that homeless applicants often have complex or multiple needs. We refer to the above government data which we note also references that 10% of households assessed have a drug or alcohol dependency. It is not uncommon in our experience that homeless persons with substance dependency issues also have mental health issues or impairments that constitute a disability.

B. Accommodation with adequate communal living space which includes, for example, space for children to play or do homework.

We refer to Shelter Scotland's report, [In Their Own Words: Children's Experiences in Temporary Accommodation](#), which states:

"families frequently used shared areas like living rooms for multiple purposes, including sleeping, playing, and storage, further limiting their functionality and increasing household stress" (page 40).

This aligns with our clients' experiences and so we support the physical standard of adequate communal living space particularly for this purpose.

Clarification is required however if "communal living space" in this context means the living space is communal to the specific family/homeless household (which we would support), rather than to other homeless households. This is particularly important in relation to a child's development.

Further, Article 5(e) of the UAO provides that accommodation is unsuitable if the household does not have the use of a living room. However, the UKSC in *X v Glasgow City Council* and the Inner House in *Y v Glasgow City Council* have both held that accommodation can be suitable where a living room is used on a temporary basis for the dual purpose of a living room by day and bedroom by night. This follows s136(2)(b) of the Housing (Scotland) Act 1987 which allows for a living room to be used as a bedroom.

In our submission the standard ought to mean that a living room is to be used exclusively as a living room.

C. A household assessment to consider whether the temporary accommodation offered is affordable by the household.

We welcome the enforcement of this standard.

We are aware that England has secondary legislation that specifically provides that accommodation must be affordable to be suitable accommodation in law: Homelessness (Suitability of Accommodation) Order 1996 SI 1996/3204. It is submitted that a similar approach is adopted to enforce this standard.

We note that Legal Services Agency's research (*Charges for temporary homeless accommodation in Scotland: law and reality*¹) found that there is inconsistency across local authorities in relation to how charges are calculated and that most did not take individual circumstances into account when setting their charges. We regularly encounter that rents for temporary flats are higher than the equivalent flat would be if it was permanent accommodation let as a Scottish Secure Tenancy. This creates a risk of hardship for our clients; particularly those individuals/households that are ineligible for benefits to cover the rental charge. Working individuals/households are therefore at increased risk of indebtedness.

D. Providing the means to support people to maintain relationships with their pets.

In our experience, homeless persons with a pet often struggle to obtain accommodation. The Scottish Government introduced guidance in November 2019² recommending that landlords and local authorities introduce:

- temporary shelters with 'dog friendly' communal rooms
- improved training for service staff in the importance and benefits of supporting people to remain with their pets and how to work with animals
- risk assessments to ensure there are no issues with staff members being allergic to, or afraid of, animals
- pet friendly policies that people agree to and sign to access accommodation.

Unfortunately, our experience has been that there is very little implementation of this guidance in practice. We have experience of clients having, for example, a dog for emotional support and no means to shelter their pet elsewhere. This often requires them to make a difficult decision to either remain homeless or give up their pet. For many of our clients experiencing homelessness, a pet is a valuable source of comfort and support, especially if that person has poor mental health.

It is likely that the current wording may result in a local authority deciding that supporting people to maintain relationships with their pet by visiting them in kennels would meet the requirement. It is suggested that the long-term boarding of a pet should not comply with this provision and that where a person has a pet, provision of accommodation which does not allow their pet to live with them should, in these circumstances, be considered unsuitable.

It is submitted that the seven-day exception period in respect of certain physical standards allowed by Article 7 of the UAO should cover accommodation where a person's pet cannot reside with them, giving the local authority up to seven days to source suitable temporary accommodation which allows the pet.

¹ [Legal Services Agency | Charges for temporary homeless accommodation in Scotland: law and reality \(2021\)](#).

² [Scottish Government | Pet-friendly accommodation services \(2019\)](#).

Question 2: Please tell us whether there are any additional physical standards that you think should be added to this framework?

Answer

- A. Accommodation that can meet the needs of any person within the household, considering both physical and mental impairments, and the nature and type of accommodation – we refer to our answer at question one.
- B. Accommodation which provides for a living room to be used exclusively as such – we refer to our answer at question one.
- C. Providing accommodation that allows a pet – we refer to our answer at question one.
- D. Temporary accommodation should be suitable for a homeless applicant’s religious and cultural needs – for example, often in shared temporary accommodation (B&Bs/hostels/hotels), there will be shared kitchens with specific opening and closing times. We are aware that restricted kitchen opening hours can prevent homeless applicants from cooking meals in the early morning or late evening. This will generally not be appropriate for homeless applicants practicing Ramadan. Muslim applicants can therefore face discrimination on grounds of religion as they are often unable to access meals at appropriate times when fasting. We are aware that this can also impact applicants’ health (due to not eating when the kitchen is closed or being unable to cook a healthy meal) and/or result in unnecessary expense if there is no other option but to eat out at cafes/restaurants. In our experience, many homeless applicants practicing Ramadan are also refugees/asylum seekers who already have limited financial resources.
- E. Applicants with dietary restrictions, for example vegetarian, vegan, Halal, or those with food allergies, should have access to their own fridge/food storage cupboard to comply with health and safety and avoid cross-contamination when in temporary accommodation with shared facilities. This would ensure that their groceries are kept separate from other residents. This also applies to applicants with health issues who require their own fridge for storing medication, such as applicants diagnosed with diabetes.
- F. Where there is mention of a requirement for the facility to allow visitors, including provision for visits from children where possible. This should include provision for visits by carers for homeless applicants with health issues, both on a formal and informal basis.
- G. Accommodation should be free of pest infestation. We have unfortunately had many reports from our clients that their temporary accommodation has a pest infestation, including bed bugs/cockroaches/mice.

Question 3: Do you think that the definition of the physical standards is clear or are there some standards that could be clarified or explained in more detail to aid understanding?

Answer

As outlined in our answer to question one and two, the following standards could be clarified:

- A. Accessible accommodation that can meet the needs of any disabled person within the household: clarify that this includes both physical and mental impairments. The word “disabled” should possibly be removed to ensure other needs of vulnerable applicants, such as those in recovery from substance misuse, are also considered. Further clarification and detail could also be included to address the nature and type of accommodation and impact that this can have on a homeless household’s needs. There should be provision as to how needs should be assessed by local authorities to ensure consistency and transparency.

- B. Accommodation with adequate communal living space which includes, for example, space for children to play or do homework: further clarity on whether this means communal living space solely to the individual homeless household and that there should be a living room exclusively for this purpose.
- C. Household affordability assessment: clear statutory framework and guidance on how this assessment is to be undertaken.
- D. Pets – clarity on if this means accommodation which allows a pet is to be provided.
- E. In relation to requiring accommodation that should comply with repairing standards, Scottish Housing Quality Standards, health and safety, hygiene, smoke, fire, furniture and electrical equipment legislation and regulations: Whilst Article 4(c) of the 2014 Order requires compliance with minimum standards, greater specification of the housing quality standards that are applicable with reference to the relevant statutes and clear guidance provided would be necessary.

Question 4: Do you think that any of the physical standards should not be included in the TASF?

Answer

No.

Question 5: Do you think that the accommodation prescribed under article 7A provides suitable accommodation for certain homeless households?

Answer

Given the realities of the current homelessness and housing situation in Scotland, particularly across Edinburgh, we recognise that the types of accommodation prescribed under Article 7A (for example, rapid access accommodation and shared tenancy accommodation) are currently required for some types of households and should not be considered unsuitable when used appropriately. In all circumstances this type of accommodation should only be used in the short-term. Also, whenever such accommodation is used, there should be a requirement to produce a written plan for moving the household to suitable accommodation.

In our many years' experience of representing homeless persons, rapid access or shared tenancy accommodation are rarely suitable for most households.

Article 7A requires that a homeless household provide their express agreement to be placed in the accommodation that would otherwise be deemed unsuitable for certain categories of homeless persons.

We have represented a significant number of households who are placed in shared flats with strangers resulting in problems, often due to lifestyle differences. Although such accommodation should only be provided where a person agrees to this, in practice we find many of our homeless clients have not understood that their express consent is required. Our clients often advise that they have simply been told that they can either have shared tenancy or no accommodation at all. In our experience therefore, homeless applicants are often only agreeing to this to avoid further rooflessness. This is not informed consent.

In addition, it should be made clear to homeless persons that their agreement to shared accommodation can be withdrawn at any point. We consider that it should be a requirement for homeless persons to be advised of these rights in writing; and in a language they understand.

Anecdotally we are also aware of Rapid Access Accommodation being used as longer-term temporary accommodation, rather than emergency accommodation until suitable temp is provided. We see this particularly in cases where the homeless individuals have complex care and/or support needs due to a lack of suitable supported temporary accommodation.

Question 6: Do you think the location standards set out in the TASF set out are relevant and fit for purpose?

Answer

We agree that what is there is relevant and useful, albeit the standards do lack specification. We refer to our responses below outlining the issues which, in our view, need to be addressed for the standards to be fit for purpose.

Question 7: Do you think that the definition of the location standards is clear or are there some standards that could be clarified or explained in more detail to aid understanding?

Answer

The use of the phrase “where possible” is unhelpful in our experience. Whilst we acknowledge that some authorities, especially in rural areas, may face difficulty in meeting this, for temporary accommodation to be suitable, essential services must always be accessible to homeless households.

It would assist if “reasonable access” were more clearly defined. For example, we often find that a homeless person’s employment will be deemed accessible anywhere within Edinburgh due to the existence of public transport links. However, little to no account is taken in practice of individuals who work unsocial hours and cannot rely on public transport, and/or who have needs that mean they cannot use public transport.

Further clarification could be given on what is a “reasonable distance” to travel by public transport; with reference to factors such as travel time and travel routes (where the location of the accommodation means homeless persons must take multiple modes of public transport) to achieve greater consistency in how this is applied in the circumstances of the case.

A definition or greater guidance on the meaning of ‘an informal support network’ is required in our view to make this realistically enforceable.

In addition, essential services include supermarkets, but when a homeless person’s income is limited to Universal Credit and they are placed in temporary accommodation with no cooking facilities, households may have to rely on expensive ready meals or takeaway food which is unsustainable. In our experience, an essential service for many clients is the place they can obtain free or reduced cost food, such as a mosque, food bank, or charity providing them with support. When homeless persons from Edinburgh are accommodated in a hotel outside of Edinburgh, their access to such essential services is removed. This can leave them unable to eat. We have assisted many clients who receive free food from a food bank or a mosque and have no means to buy food when placed in unsuitable accommodation without access to a kitchen.

Another essential service not currently listed but which the current standards could be expanded to include is access to the local job centre and/or charities, for example, as in Edinburgh, Streetwork and Crisis. These services are essential for the clients we represent as they provide crucial support in many matters relating to a person’s homelessness.

We note that there is discussion within the consultation of access to cultural or religious needs. Further specification of what this means would be required. For example, it is unclear if this would include access to halal shops which we know can be an issue with out of area hotel referrals for homeless households.

Regarding the proposal that there is “an assessment of personal safety of the household”, specifically for those experiencing domestic abuse, it is unclear if reference to an assessment ensures homeless perpetrators are not offered temporary accommodation close to the victim, which would only apply to convicted perpetrators.

Also, what the position would be if there are allegations of domestic abuse but no conviction. It is also unclear how the safety will be assessed.

It would be important to clarify the process, and we would suggest that good practice would require a written assessment and that this is shared with the homeless household.

Question 8: Please tell us whether there are any additional location standards that you think should be added to this framework?

Answer

As stated above, Muslim homeless applicants who may only be able to eat Halal food currently face particular barriers when sourcing appropriate food.

Temporary accommodation should in our view be deemed unsuitable if it is not a reasonable distance by public transport from vendors of Halal or other appropriate food types.

This should apply equally to homeless persons from other religions/denominations who require to adhere to similar food requirements.

Question 9: Do you think that any of the location standards should not be included in the TASF?

Answer

No.

Question 10: Do you think the service standards set out in the TASF are relevant and fit for purpose?

Answer

Mostly, yes. Trauma-Informed Practice has been considered through the inclusion of Psychologically Informed Environments, and the impact of domestic abuse on households has been considered through the provision of single-gender accommodation for households who have experienced domestic abuse.

Generalised signposting to external agencies to ensure ongoing support is in place to cover the needs of the household with regular reviews intended to monitor any changes in needs during the period in temporary accommodation.

Ensuring that staff have been trained in trauma-informed care to ensure person-centred needs are met should not be framed “as required” but instead an expectation that staff have been trained in this area.

Question 11: Please tell us if there are any additional service standards that you think should be added to this framework?

Answer

Racial inequality in housing in Scotland, particularly towards Black and Minority Ethnic groups, is statistically proven and well-documented (see Shelter and CRER's 2025 Joint Report).³ The report details that in 2024/2025, of the instances where homeless people were turned away from temporary accommodation, Black and People of Colour households made up 36% of the total figures and, in many instances, this occurred before an application had been taken, an assessment made, or interim temporary accommodation had been provided. Further, Black and People of Colour households spend an average of 79 extra days in temporary accommodation compared to a White household, with 388 days being the average stay in temporary accommodation for an African-led household in temporary accommodation.

Additional service standards should therefore, in our view, be added to the TASF to ensure that Black and Minority Ethnic groups are represented in the service standards with any additional needs households have. This may include support to ensure that cultural and religious needs are met, and that consideration is given to any specific accommodation needs. For example, more bedrooms to ensure that male and female siblings are not expected to share if this would not be acceptable in the household's culture.

The Scottish Government's 2024 homelessness equality impact assessment results⁴ demonstrated that members of the LGBT community are vulnerable to homelessness with LGBT young people accounting for 24% of Scotland's young homeless population. In June 2025, the Scottish Housing News reported that many people in the LGBTQ+ community affected by homelessness reported that housing services were not tailored to their needs and that staff often lacked the training necessary to provide safe and supportive environments⁵. The service standards could assist this situation by adding training for housing staff in better understanding the needs of LGBTQ+ persons who may require temporary accommodation.

A significant proportion of our homeless clients encounter additional barriers when trying to access homeless assistance either because English is not their first language or they have some other communication need. The TASF should therefore include a requirement for local authorities to use interpreter services where appropriate, including at: locality offices, during homeless assessments, when signing homeless persons up for and viewing temporary accommodation, and when homeless persons need to call any Out of Hours homelessness services.

All homeless application documentation and correspondence should be translated. Homeless applicants should always be asked if they require an interpreter before any substantive information/support is given to them relating to their homeless application. Steps should also be taken to ensure that an individual has been fully advised of their rights and that these have been understood. Their communication needs should be recorded at the outset, when the applicant initially makes their homeless application. This should also apply to any other communication needs required by a homeless household (for example audio, large print, braille, sign language).

³ [Shelter Scotland and the CRER | Systemic Racism and Scotland's Housing Emergency Joint Report \(2025\)](#).

⁴ [Scottish Government | Homelessness prevention duties: equality impact assessment results \(2024\)](#).

⁵ [Scottish Housing News | Charley Wilson: Pride and prejudice – the housing crisis facing LGBTQ+ Scots \(June 2025\)](#).

We also suggest that homeless applicants should be provided with contact details for their Homelessness Officer at the local authority at outset of their homeless application. This is often not done in our experience.

Question 12: Do you think that the definition of the service standards is clear or are there some standards that could be clarified or explained in more detail to aid understanding?

Answer

As above, the wording in relation to the standard surrounding trauma-informed care training should be amended to remove the qualifier “if required.” Otherwise, it would be helpful if the service standards could be clarified to demonstrate that specific thought has been given to Black and Minority Ethnic Groups and members of the LGBTQ+ community, as explained above.

Clarification is also required in terms of the delivery of information to households. The service standards currently read that information should be provided in different formats. There should be a requirement for information to be provided in the household’s first language. There is also no mention of different formats to meet differing needs, such as braille, larger print, audio. To ensure compatibility with the Public Sector Equality Duty, it would be useful to clarify that needs in relation to the provision of information will be considered on a case-by-case basis and met.

Question 13: Do you think that any of the service standards should not be included in the TASF?

Answer

No.

Question 14: Do you think the management standards set out in the TASF are relevant and fit for purpose?

Answer

In their current form, we do not consider the management standards to be fully fit for purpose. While the intentions behind them are welcome, they are drafted at a high a level, lack enforceable minimum requirements, and leave considerable scope for inconsistent interpretation across providers and local authorities.

Our concern is that key areas such as notice periods, safeguarding obligations, staff skills and training, and resident protections are not sufficiently defined to ensure meaningful or consistent implementation.

As drafted, the standards may not provide the level of clarity, accountability, or protection required for households in temporary accommodation, particularly those with vulnerabilities.

Question 15: Please tell us whether there are any additional management standards that you think should be added to this framework.

Answer

We are of the view that the TASF would benefit from additional standards covering:

- explicit privacy, confidentiality, and data-handling requirements
- minimum notice periods and fair-process protections for eviction, relocation, and access to accommodation
- mandatory safeguarding protocols, including domestic-abuse and child-protection procedures
- regular review of support needs for households throughout their placement

- minimum training requirements for staff, including trauma-informed and rights-based practice
- mechanisms for resident engagement and clear expectations around complaints monitoring and transparency.

These additions would strengthen consistency, accountability and rights protection across all providers.

Question 16: Do you think that the definition of the management standards is clear or are there some standards that could be clarified or explained in more detail to aid understanding?

Answer

Several standards require further clarification. Terms such as “legally compliant occupancy agreement”, “reasonable notice”, “emergency access”, “house rules” and “adequate staffing levels” lack definition and risk varied interpretation.

Without clearer guidance or minimum requirements, it will be difficult for providers to apply the standards consistently or for residents to understand their rights. Additional explanation, and in some cases illustrative examples or templates, would assist significantly in making the TASF clearer and more workable.

Question 17: Do you think that any of the management standards should not be included in the TASF?

Answer

No. As stated above, the issue is not the inclusion of particular standards but the need for them to be strengthened, clarified, and more precise.

The current standards reflect appropriate areas of focus, but without greater specificity they may not operate effectively in practice.

Question 18: Do you agree that the TASF should be legally enforced?

Answer

Yes. As solicitors with significant experience in this area of law, we see the importance of the TASF being legally enforced. Compliance with the TASF may not be prioritised by local authorities unless it is legally enforceable by a homeless household.

The Scottish Government publication for this consultation explains that the TASF is based on temporary accommodation standards already published and that build on existing standards covered by legislation. In our experience, the existing standards are already not consistently complied with. We therefore believe that something must be different about the TASF for it to have a meaningful impact. It is hoped that making the TASF legally enforceable will be a motivating factor in achieving compliance.

Question 19: Do you agree that it would be appropriate for the TASF to be included within the Scottish Social Housing Charter when it is reviewed in 2027?

Answer

Yes. We note that one of the purposes of the Charter is to set out the standards and outcomes “homeless people can expect from social landlords in terms of access to help and advice, the quality of temporary accommodation, and continuing support to help homeless people access and keep a home owners can expect from the property management services they receive from social landlords”.

On that basis it seems appropriate and logical that the TASF is included with the Charter when it is reviewed in 2027. However, inclusion in the Charter is not sufficient in our view.

As stated in response to question 18, we also believe that compliance with the TASF should be a legal duty. A simple way of achieving this could be to update the UAO to include the standards described in the TASF. If this was done, individuals could ask that local authorities comply with their legal duty and have recourse to legal remedies, including judicial review, if the authority failed or delayed doing so.

It is noted in the case of *X v GCC* the UKSC has held that what is suitable in the short term may not be suitable in the long term with respect to the 2014 Order. For example, accommodation may be suitable even where it does not meet the needs of the household, albeit there may be a point in the future where it becomes unsuitable. Whereas it is noted that the physical standard in the TASF requires that the accommodation “is able to meet the needs of any disabled person within the household”. Therefore, it is submitted if the policy aim of TASF is to be achieved, consideration should be given to the drafting of legislation to ensure that the standards are enforceable in practice. The inclusion of the TASF within the UAO, would also require stakeholders to consider wider access to justice issues within the housing sector and solutions to address this. Through our work, we are aware that this is a considerable area of unmet need and that many vulnerable people need but cannot secure legal representation to enforce their rights under the UAO. We are contacted every week by around 10 people who have been in unsuitable accommodation in terms of Article 5 of the UAO for periods more than the seven-day exception. Whilst people in Scotland have some of the most comprehensive homelessness rights in the world, these risk becoming meaningless if individuals affected cannot enforce them when they are routinely breached.

It is noted that in Scotland there is no statutory right to a review for a homeless household in relation to the suitability of accommodation, unlike in England. It is submitted that a reasonable and proportionate step that could be taken in relation to enforcing the TASF and suitability of accommodation in general with reference to the 2014 Order would be to create a statutory right of review. This would follow the well-established process for reviews of homeless decisions as set out in s35A of the Housing (Scotland) Act 1987. This would enable homeless households to request that a local authority review the decision they have made that accommodation offered is suitable in terms of the 2014 Order and complies with TASF.

Question 20: Do you agree with the proposal for the Scottish Housing Regulator to monitor social landlords’ performance of the TASF?

Answer

Yes, but as stated above, the TASF should be directly enforceable by homeless households. We would suggest that compliance with TASF could be an implied term of all tenancy/occupancy agreements in respect of temporary accommodation, to ensure enforceability and availability of legal remedies beyond judicial review, for example, breach of contract claims.

We believe that an inquisitorial and robust approach would have to be taken by the SRH in monitoring the performance of the TASF.

We are also aware of challenges in capturing accurate data of the issues and regulation breaches faced by homeless households. Greater collaborative working and appropriate data-sharing between local authorities, stakeholders and the SHR would go some to address this.

Question 21: Do you think that there should be sanctions, such as penalties or fines, applied to those local authorities that fail to meet the TASF?

Answer

Yes, we can see the merit in this but reiterate our position outlined in response to questions 18 and 19 on why the TASF requires to also be directly enforceable by tenants.

Subject to the SHR's having capacity to deal with additional monitoring and issuing sanctions, it would be important for sanctions to have an impact, that they are robust, routinely implemented where there are breaches, and enforced to have impact. We would also suggest that where there are repeated breaches by a local authority, more severe sanctions should be enforced to ensure these are a meaningful deterrent.

Question 22: Please tell us about any other approaches or options you think would be appropriate to implement to ensure that local authorities/registered social landlords adhere to the TASF.

Answer

As stated above, we would suggest that compliance with TASF could be a term in all contracts governing occupation of temporary accommodation, and that the UAO is amended to require compliance with TASF.

For the reasons already outlined, this would be required to achieve the aim of the TSAF that all persons facing homelessness are provided with safe and suitable temporary accommodation.

Question 23: Do you agree with the proposal to review, and update as necessary, the TASF broadly in alignment with the review of the Scottish Social Housing Charter?

Answer

Yes.

Question 24: Do you agree with the proposal for a formal evaluation of the implementation of the TASF after three years?

Answer

Yes.