



EQUALITY IMPACT ASSESSMENT (EqIA)

Summary results of the EqIA

Title of policy/practice/process/service:

CLAO Edinburgh Homeless Helpline (“CLAOE HHL”).

Is the policy new (proposed), a revision to an existing policy or a review of current policy?

Review of current policy.

Key findings from this assessment (or reason why an EqIA is not required):

The provision of civil advice and representation to individuals via CLAOE HHL Pilot is a highly valuable service that achieves positive outcomes for clients on a regular basis. This service primarily assists vulnerable clients who are facing street homelessness, or otherwise not being provided with temporary accommodation when the local authority has a legal duty to do so. This service has a positive impact on clients with almost all relevant protected characteristics. The exceptions are:

- marriage and civil partnership (not applicable to this EqIA)
- religion (no impact as the evidence does not show any clear links between religion and homelessness).

Therefore, the CLAOE HHL service should be made permanent.

Summary of actions taken because of this assessment:

- Transition of CLAOE HHL Pilot into a permanent service
- Review and analysis of CLAOE HHL internal equalities statistics from April 2023 to March 2025
- Review of existing reasonable adjustments and support measures either offered to or in place for HHL clients.

Ongoing actions beyond implementation include:

- three-yearly review of the EqIA, including internal equalities statistics, support measures and reasonable adjustments offered to HHL clients
- six-monthly review of the frequency with which people (particularly those with a disability) request in person meetings
- an earlier review if the nature or remit of the service changes prior to the three-year mark.

Lead person(s) for this assessment (job title and department only):

- Head of Service, Civil Legal Assistance Office

- Head of Office, CLAO Edinburgh
- Acting Head of Office, CLAO Edinburgh (maternity cover)
- Network Duty and Development Solicitor, CLAO Edinburgh.

Senior responsible owner (SRO) agreement that the policy has been fully assessed against the needs of the general duty (job title only):

Head of Office, CLAO Edinburgh.

Publication date (for completion by Communications):

15/07/2026.

Step 1: Scoping the work being assessed

1.1. Briefly describe the aims, objectives and purpose of the policy/practice/process/service.

The HHL Pilot aims to engage with vulnerable, hard-to-reach groups of individuals who are facing urgent homelessness problems. We focus on resolving urgent homelessness issues as soon as possible by offering streamlined legal advice and representation.

The overall aims of the CLAOE HHL Pilot service are:

- providing a more responsive, accessible and direct service to individuals with urgent homelessness cases
- providing streamlined access to a solicitor who can evaluate their homelessness case and do the necessary urgent legal work as a priority through:
 - utilising relationships with homeless individuals and third sector agencies
 - reducing the number of people an individual with an urgent homelessness case must speak to before being provided with legal advice, assistance and representation
 - ensuring that when the HHL is operating there is always a solicitor allocated with capacity to provide legal advice, assistance and representation in urgent homelessness cases (where demand exceeds our capacity, we operate a queue of HHL contacts who will be dealt with on a first come first served basis)
- increasing the number of clients that we can provide advice, assistance and representation to for homelessness cases
- making it easier for clients to engage with our service
- resolving homelessness issues more quickly and efficiently.

Nature and urgency of homelessness legal advice, assistance and representation

Homelessness is a core area of work for CLAO and one of the main areas of casework for CLAOE. We deal with many aspects of homelessness law, including assisting people who are sleeping rough or in unsuitable temporary accommodation due to a local authority failure to comply with their statutory homeless duties. Assisting those who are not provided with temporary accommodation in breach of statutory duty is high priority for admission to our casework service, due to factors such as:

- the consequences for the individual (and others who may be seeking homelessness assistance from the same local authority) of not challenging breaches of statutory duties by local authorities

- the decision-maker (local authority) will always be legally represented
- it is unlikely that an individual will be able to resolve their homelessness issue on their own or with other help (due to the ongoing housing crisis and resulting accommodation shortages, local authorities such as City of Edinburgh Council, “CEC”, will frequently wait until they are legally challenged before offering temporary accommodation. CLAOE are often referred urgent homelessness cases by advice agencies, such as Crisis and Streetwork, who have already written to the local authority on behalf of individuals to raise and address statutory breaches under homelessness law, with little to no success in achieving positive outcomes).

Barriers to accessing homelessness legal services

Our experience is that nearly all rough sleeping contacts will be eligible for legal aid and the nature of their legal issue will not usually be resolved by solely providing the individual with legal information and advice. These types of cases require urgent legal intervention and challenge. It can be difficult to offer legal services to homeless contacts through our normal triage process.

Our normal triage process typically requires different colleagues within CLAO, at different points in the process, to determine if the legal issue is something CLAO can assist with and allocate a solicitor to. Generally, an individual who has contacted our service seeking assistance with a legal issue that appears to be within our casework remit, will receive a call back from us (depending on the individual’s stated communication preference) to obtain further information about their case and to confirm their eligibility for legal aid. Thereafter, their case will be progressed to the next stage in the process to determine if a solicitor can be allocated to the case and if so, when an appointment can be offered. In our experience therefore, and due to the nature of their circumstances, rough sleepers can be difficult to contact and/or maintain contact with when following our usual triage process. Some rough sleepers will not have access to a mobile phone nor to an email account. Frequently, they will attend specialist services such as Streetwork or Crisis to request help and rely on their support worker to contact CLAO on their behalf.

The CLAOE HHL provides a more streamlined service whereby the individual is directed more quickly to a dedicated solicitor who can provide urgent legal assistance. If an appointment with a solicitor is not offered as soon as possible, it can cause difficulties with maintaining contact with the individual for long enough to allow us to assist them in a meaningful way.

Homeless individuals are likely to, by nature of their circumstances, face a multitude of different barriers in accessing legal services. For example, they may not have had somewhere safe to sleep the night before the appointment, they might not have a charged up mobile phone to allow them to keep track of appointment dates and times or may not have money to pay for transport to our office. As stated above, ongoing engagement with clients who are sleeping rough can be difficult.

These contacts to our service benefit from an urgent appointment with a solicitor, as soon as possible, due to the urgency of their situation and the need to carry out urgent follow-up legal work. The HHL service aims to address this need, subject to our capacity and the level of demand for the service.

The service ensures that when the HHL is operating, there is a dedicated HHL solicitor available, with a clear diary to casework urgent homelessness cases as soon as possible. This type of legal assistance would otherwise not be possible for us to deliver due to other work and service commitments.

History of CLAO homeless services

Prior to the Covid-19 pandemic, CLAOE had been considering process changes to make it easier to offer rough sleepers a service that met their needs effectively. Unfortunately, due to staff vacancies and heavy court loads, CLAOE did not have the capacity to test any changes at that time.

During the pandemic in 2020-21, there was a reduction in court capacity and a decrease in the number of new contacts. CLAOE then had sufficient resources to consider trialling some changes to our contact handling service to address the above issues. In addition, some changes brought in due to Covid-19 (for example, signing legal aid forms on behalf of clients when completed over the phone or being able to remotely witness Affidavits being signed) presented an opportunity for trialling provision of legal services by telephone.

The pandemic highlighted the need for solutions to barriers faced by those sleeping rough and it became more pressing in some respects to ensure access to our services. Other changes to CLAO's services due to Covid restrictions, such as moving from face-to-face provision of legal services to telephone and online, raised concerns about whether certain vulnerable groups would find our services less accessible. Whilst travel remains a barrier for those sleeping rough, this group were also identified as being disadvantaged by a lack of provision of face-to-face legal services. For example, due to absence of other means of contacting legal services, such as by telephone or email.

At this time, CLAOE's former Head of Office was invited to join a group of homelessness advice agencies working in Edinburgh, set up to share information and trends in homelessness during the pandemic. As well as CLAO, the group included Shelter, the Winter Welcome Centre, Crisis and Streetwork. In 2024-25, one of CLAOE's Senior Solicitors continued to attend these sessions. Through discussions at this group, CLAOE became aware of the implications of the deepening housing crisis on homeless individuals and that there was a growing need amongst this group for urgent legal assistance. The number of people sleeping rough was also increasing, despite the policy of accommodating all those rough sleeping at the beginning of the pandemic.

CLAOE previously ran a small trial of a direct helpline to those attending the Winter Welcome Centre. CLAO's involvement was identified as helpful and allowed more effective engagement. However, the setup of the Welcome Centre had link workers trained to process homeless applications. The Welcome Centre links individuals into the appropriate supports and emergency accommodation is provided, so they are no longer rough sleeping. Therefore, CLAO's involvement was not required so urgently as for those rough sleeping.

In 2025, the housing crisis in Edinburgh has continued to raise an ongoing unmet legal need for members of the public in accessing temporary accommodation despite the local authority's legal duties to do so. The HHL has continued to be exceptionally busy and there is high demand for our service, often with a backlog of individuals awaiting a telephone call. Over the course of July to September 2025, CLAOE assisted over 200 clients via the service. These statistics, along with the historic demand for the service, demonstrate that making the HHL Pilot a permanent service is justifiable. In 2025, CLAOE staff members continue to attend regular meetings with third party advice agencies, including Homelessness Services Update meetings (with Shelter, Bethany Christian Trust, Streetwork, Crisis, and Scottish Refugee Council).

CLAOE has also recently joined the Homelessness Justice Legal Collaboration (HJLC), in an observer capacity, which was established in 2025 and meets monthly. Shelter Scotland, along with project partners, Legal Services Agency, secured funding from the Independent Human Rights Fund for

Scotland (the Corra foundation) to progress a collaborative legal response to the Housing Emergency. The purpose of the collaboration is to create space for those attending to:

- reflect on current homelessness practice across different local authority areas
- share how each organisation responds to poor or unlawful practices by local authorities
- consider the impact of any legislative changes, proposed changes or recent decisions
- develop legal strategies to tackle systemic homelessness rights breaches
- seek solutions to community-identified issues within the homelessness system.

1.2. Why is the policy/practice/process/service being examined?

Review of policy/process/service/practice.

As explained above, these types of cases require urgent legal intervention via casework intake. In the past, it has been difficult for CLAO to offer urgent initial appointments in these types of cases due to a combination of our triage process, capacity, and the nature of the demands on solicitors when managing their current caseload and pre-existing diary commitments. Prior to the CLAO HHL, we were therefore often unable to offer an appointment quickly enough to someone experiencing an urgent homelessness problem. We also noted other frequent barriers with client engagement, including lack of money to facilitate travel to appointments.

Since the launch of the CLAOE HHL Pilot, we have been able to successfully resolve many urgent homelessness cases quickly and effectively. We have received significant positive feedback over several years from the third sector agencies and members of the public that we have been working with. We have also noted a sustained high demand for the HHL service over several years, escalating in 2025 due to the homelessness crisis in Edinburgh.

We are now seeking to transition the Pilot into a permanent change to our service. We will continue to raise awareness of the HHL service and invite third sector organisations who are assisting members of the public who are roofless, without accommodation, or who may be facing rough sleeping because of statutory breaches by local authorities to use the HHL.

1.3. Who is affected by this policy/practice/process/service?

- CLAO staff
- Third sector partner agencies (for example, Crisis and Streetwork)
- Clients (for example, individuals and families experiencing homelessness).

1.4. Policy/practice/process/service implementation date.

01/08/2024.

1.5. What other SLAB policies or projects may be linked or affected by changes to this policy/practice/process/service?

- SLAB Customer Service Policy
- SLAB Customer Communication Support Services Policy
- Vulnerable Customer Policy

- Rota system for CLAOE solicitors (HHL is open 10am–3pm Monday to Thursday, and 10am–12pm on Fridays, however, solicitors covering the HHL will usually need to keep their diaries clear for the full working day during business hours).

Step 2: Consider the available evidence and data relevant to your policy/practice/process/service

2.1. What information is available about the experience of each equality group in relation to this policy/practice/process/service?

General information about the policy/practice/process/service

1. Homelessness in Scotland: 2023-24

This Report confirms that for the period of 2023-24, there were 40,685 homelessness applications in Scotland. This is an increase of 1,377 (4%) compared to 2022-23, and the highest since 2011-12. There were 16,330 households in temporary accommodation as of 31 March 2024. This is 9% higher than 15,039 as of 31 March 2023, and the highest in the time series. The number of children in temporary accommodation is also the highest in the series, increasing to 10,110 from 9,595 (5%) between March 2023 and 2024. At the time the Report was published, the number of households reporting rough sleeping the night before making a homeless application had increased from 1,493 to 1,916 and in the three months prior from 2,425 to 2,931.

2. Homelessness in Scotland: 2024-2025

This Report confirms that for the period of 2024-25, there were 34,067 homelessness applications in Scotland. The number of households reporting rough sleeping the night before application has increased from 1,932 to 2,465. In the three months prior to a homeless application being made, the number of households sleeping rough has risen from 3,058 to 3,579. Edinburgh has the highest number of open homeless cases in Scotland, at 7,866, accounting for 25% of all open homeless cases in Scotland. There were 16,485 recorded instances of local authorities failing to provide temporary accommodation in Scotland, which is more than double the figure of 7,955 the previous year. In Edinburgh, this number increased from 1,515 to 3,245. There were 10,180 children in temporary accommodation in Scotland as of 31 March 2025. There was a total of 45,190 temporary accommodation placements associated with homeless cases that closed in 2024-25. Of which 16% were in hostels and 36% in Bed & Breakfast accommodation. Between April 2024 and March 2025, there were 7,850 reported breaches of the Unsuitable Accommodation Order 2014 in Scotland. This compares to 7,440 reported in 2023-24.

3. Crisis – The homelessness monitor: Scotland 2024

There has been a rise in statutory homelessness presentations in Scotland since the Covid-19 pandemic. Acceptances stand at 2% higher than pre-pandemic (2019-20) and 10% higher than in 2021-22. More than half of local authority survey respondents (16 of 30) reported that service user footfall had ‘significantly increased’ in 2022-23 compared to the previous year. A further eight local authorities reported that it had increased slightly.

Temporary accommodation placements have escalated sharply, standing at a historic high of 15,060 as of 31 March 2023, up 29% since March 2020. In 2023, the number of children in temporary accommodation rose 10% to 9,595. Use of Bed & Breakfast accommodation rose by 124% in the three

years to March 2023 (from 789 to 1,765). The Scottish Housing Regulator has warned that there is ‘an emerging risk of systemic failure’ in homelessness services.

This Report refers to trends in ‘core homelessness’. This term covers people in the most severe and immediate forms of homelessness (such as rough sleeping, sofa surfing, staying in hostels, refugees or unsuitable forms of temporary accommodation). In 2022, core homelessness in Scotland is estimated to have stood at 18,400 households on an average night, having risen by 11% (1,800) since 2020. Within Scotland, rates of core homelessness are generally higher and tended to increase in the main city regions of the central belt, whilst rates are lower and tend to have fallen in other sub-regions, including the more rural and north-easterly parts of the country.

The largest element of core homelessness in 2022 was sofa surfing, accounting for more than half of core homeless individuals or households (11,630). Homeless households in hostel-type accommodation were a total of (3,210), Bed & Breakfasts (1,930), sleeping in unconventional accommodation including cars or tents (910) and sleeping rough (720).

Over 2022-23, homeless applications from persons who had slept rough immediately prior to presentation grew to 1,500 during the year, 15% up on 2021-22 but remained 10% lower than prior to the Covid-19 pandemic. The number of homeless applicants who reported having slept rough in the three months prior to their presentation rose by 14% from 2021-22, but 16% down on pre-pandemic levels. 10 local authorities perceived that 2022-23 homelessness presentations included a larger amount of people who had formerly slept rough than in 2021-22. However, 14 local authorities reported a stable or falling number of such applicants. Levels of rough sleeping in Edinburgh appeared to be on a clear upward trajectory. In November 2023, City of Edinburgh Councillors declared a ‘housing emergency’.

Age

Statistics

- **SLAB’s data**

CLAO Edinburgh Homeless Helpline contacts data 2023-25 (internal only). Over the course of April 2023 until March 2024, the age demographics for cases approaching the CLAOE HHL service were:

- 26% ages 25-34
- 26% ages 35-44
- 16% ages 45-54
- 16% ages 55-64
- 9% no response
- 7% under age 24.

The statistics for the period of April 2024 until March 2025 were:

- 42% ages 25-34
- 25% ages 35-44
- 12% under age 24
- 11% ages 45-54
- 6% no response
- 4% ages 55-64.

- **Data relevant to the policy**

Evidence on different age categories

The [Homelessness in Scotland: 2024-25 report](#) highlights that the population in Scotland is younger than the overall population. This includes 19% of homeless applicants being 18-24 (compared to 10% to overall population), 30% being 25-34 (compared to 16%) and 32% being 35-49 (compared to 22%). Younger people are more likely to become homeless for the reason of being asked to leave former accommodation. Younger homeless applicants are more likely to require basic housing/living skills and have a learning disability. Drug/alcohol dependency and mental health problems are most common amongst 35-64 year olds. Older applicants are more likely to have a medical condition and physical disability. Younger applicants are most likely to take up temporary accommodation, and individuals aged 25 to 49 are most likely to be in unsuitable temporary accommodation.

Over the 34,067 homeless households in Scotland in 2024-25, there were 38,674 adults and 15,046 children. The number of adults increased by less than 0.5% from the previous year, whilst the number of children decreased by 1,065 (7%). There were 10,180 children in temporary accommodation on 31 March 2025, which is 1% higher than March 2024 (although this figure was 2% lower than the 10,360 reported on 30 September 2024). In 2025, 3% of homeless households with children were placed in Bed & Breakfast temporary accommodation.

The [Crisis homelessness monitor for Scotland 2024](#) highlights that the bulk of homeless applications during 2022-23 were for households headed by those aged 25 to 49 as main applicants, at 63%. In 2022-23, applications from older age groups formed 16% of applications, up from 13% in 2018-19. Furthermore, applications from 18-24 year olds had fluctuated between 19-22%, which constituted an over-representation amongst those facing homelessness compared to other age groups. This reflects higher rates of poverty among young people as well as their greater concentration in informal living arrangements (such as, staying with family or friends). The much smaller cohort of applicants aged 16-17 saw a continued decline both numerically and proportionately.

On page five of the [report](#) (Chapter Two, The wider context, Key findings) it states that:

“Those on low incomes of working age have been most exposed to the cost-of-living crisis, partly because most of their budget is spent on food, energy and other necessities and partly because social security benefits have fallen below the level required to avoid material hardship... This has contributed to rising levels of poverty, problem debt, destitution, and food bank use.”

On page 61 of the [report](#) (Chapter Four, Homelessness trends, Drivers of statutory homelessness), a survey respondent quote says that, during 2022-23, *“we have seen a moderate increase in the number of people requesting homeless assistance across all age bands, household types.”*

The report also states that, for single and young people:

“Local Housing Allowance caps and the Shared Accommodation Rate were identified as restricting people’s ability to access and sustain accommodation in the private rented sector. In the cases of young people specifically, local authorities also highlighted the immense challenges associated with lower rates of Universal Credit for this group and the impact of benefit sanctions.”

Cambridge University’s article [Shelter/housing options, supports and interventions for older people experiencing homelessness](#) advises that *“older people with experiences of homelessness are at risk of exposure, infectious disease, injury, trauma, stress and violence, and have limited options to*

participate in healthy lifestyles, resulting in negative health and psycho-social outcomes... They have more complex health and social challenges and significant unmet needs regarding access to suitable shelter/housing and support services. For example, functional impairments and chronic health conditions, including difficulties with activities of daily living (e.g. eating, bathing) and instrumental activities of daily living (e.g. financial and medication management), as well as depression, anxiety, post-traumatic stress disorder, psychosis and cognitive impairment... are challenging to support in traditional shelter/housing settings... Yet, there are few shelter/housing options to support the diverse physical, mental and social needs of older people with experiences of homelessness.”

The [article](#) also makes frequent reference to some older people with experiences of homelessness having substance and alcohol misuse conditions (including acquired brain injury and other cognitive impairments), as well as mental health challenges.

On page 22, the [article](#) states “research on ageing in the right place recognises that where older persons live impacts their ability to age optimally and must match their unique lifestyles and vulnerabilities – in other words, the ‘right’ set of housing, health and social supports can enable diverse groups of older adults (including older adults with limited income and/or chronic complex health conditions) to age in a positive way.”

Scottish Government’s [Homelessness Prevention Duties: Child Rights and Wellbeing Impact Assessment](#) from August 2024 states on page two that “young adults, aged between 16-24 years, are consistently more likely to be living in relative poverty compared to older adults. Despite this over-representation... young people, especially those leaving care, may not recognise themselves as homeless, may be more likely to be hidden from services, and therefore from official records because they are ‘sofa surfing’ or living in other informal or precarious housing, therefore their actual numbers may be higher than measured.”

Therefore, recorded statistics on young people under the age of 25 will not include situations of hidden homelessness, which means the homelessness figures for this age group may be higher.

Younger people are more likely to become homeless from the family home, more likely to have been asked to leave and are generally in more need of basic housing management support than older people.

Other risk factors for young people which increase the likelihood of homelessness include adverse childhood experiences, running away, truanting, being excluded from school, or identifying as lesbian, gay or transgender.

There are some types of households with children who are at higher risk of being in poverty. This includes households headed by women (for example, single parent households and those with a child under the age of one for which mothers tend to do the vast majority of the caring), or households where the mother is aged under 25. Domestic abuse/violence is a key contributor to both women and children’s homelessness.

Scottish Government’s [Homelessness prevention duties: equality impact assessment results](#) show that young people under the age of 25 are over-represented in homelessness applications.

In 2022-23, 22% of homeless applications were from main applicants aged 16-24, despite this age group comprising only of 12% of Scotland’s overall population.

Disability

Statistics

- **SLAB's data**

1. CLAO Edinburgh Homeless Helpline contacts data (2023-2025) (internal only).

Over the course of April 2023 until March 2024, 51% of cases that reached CLAO Edinburgh's Homeless Helpline service were recorded as having a disability. In 9% of cases, no data was recorded under the equalities category of disability.

From April 2024 until March 2025, 56% of cases were recorded as having a disability. 8% of cases had no data recorded under the disability category.

2. Written EqIA interview dated 24 July 2025 with Senior Civil Casework Solicitor, CLAO Edinburgh (internal only).

The staff member states:

"I would say that the vast majority, if not all, of our Helpline clients have either the protected characteristic of race or of disability, or both."

3. Written EqIA interview dated 29 July 2025 with Senior Civil Casework Solicitor, CLAO Edinburgh (internal only).

The staff member stated that we assist many people who have mental health issues via the CLAOE Homeless Helpline service. The second most common group of people who have protected characteristics that access our service are those with a disability, most often related to mental health conditions. It can take much longer to assist those people due to communication challenges.

- **Data relevant to the policy**

The [Homelessness in Scotland: 2024-25](#) report shows that mental health was cited in 27% of cases where applicants were unable to, or failed to, maintain accommodation. The number of homeless applicants noting physical health reasons nearly doubled from 1,927 to 3,728 in the last five years.

Since 2007-08, the largest increase in reported support needs for homeless applicants was due to mental health problems, with an increase from 12% to 30%. The number of applicants with a learning disability has risen from 2% to 5%, and for physical disabilities from 4% to 7% over the same period.

The [Homelessness in Scotland: 2022-23](#) report shows the proportion of households reporting at least one support need was 51%, which was similar to the few years prior but also marked a large increase from 33% in 2007-08 when data collection began. The largest increase was in mental health problems with 30% of homeless households noting this as a support need, compared to 12% in 2007-08. The proportion requiring support for basic housing management had also increased over this period from 10% to 23%.

The Scottish Government [Health and Homelessness in Scotland](#) report, published in June 2018, highlights that around 30% of people in Scotland who had experienced homelessness at some point in their lives showed evidence of a mental health issue. There was evidence of drug and/or alcohol misuse for 19% of individuals. Around 6% of people experiencing homelessness had evidence of combined mental health, drug-related and alcohol-related conditions (albeit not necessarily at the same time). This figure was higher for individuals experiencing repeat homelessness, at 11.4%. 94% of individuals with a history of drug/alcohol misuse had mental health issues. A higher proportion of

males have all three issues than females in the homeless population. People who have slept rough are also more likely to have all three issues.

Interaction with health services was found to increase in the years prior to homelessness presentation, particularly for mental health, drugs and alcohol issues. Therefore, these are likely to be risk factors for homelessness. This suggests a relationship between becoming homeless and health activity.

The [report](#) flags up health inequalities. Homeless people are more likely to come from deprived areas and are more likely to have worse health outcomes than the non-homeless population.

The most common causes of death amongst the homeless population are drugs, heart disease and strokes, as well as alcohol for males and cancer for females. Individuals who have faced homelessness on multiple occasions are more likely to die due to drug-related conditions. Homeless people have higher rates of premature mortality than the rest of the population, particularly due to suicide and unintentional injuries, as well as increased prevalence of infectious diseases, mental disorders and substance misuse. People facing homelessness are more likely to die younger.

Mortality rates for males were around one third higher during periods of homelessness, which may be driven by the higher number of drug-related deaths. This is particularly the case for males that have been homeless on multiple occasions. Health activity relating to drugs is higher amongst younger people experiencing homelessness.

Homelessness influences health outcomes and is an independent risk factor for deaths from specific causes. Peaks in health activity occur around the date of the first homelessness assessment, with larger peaks for males. This suggests a relationship between becoming homeless and health activity. For some people, becoming homeless may be associated with a crisis that has a health aspect. For example, this may be associated with drug and alcohol misuse, and mental health. There is clear evidence of a relationship between homelessness, drugs, alcohol and mental health issues. A much higher proportion of repeat homeless individuals have drug, alcohol and mental health issues.

Homeless individuals are more likely to be admitted to Accident & Emergency (“A&E”) and this is greatest amongst those aged 31-40. This [report](#) identified a peak in A&E activity around the time of the first homelessness assessment, with a gradual rise leading to this and on average, higher activity afterwards. This is especially the case for individuals with a history of repeat homelessness.

Homeless individuals are also more likely to face acute admissions to hospital. There is a peak in acute admissions around the time of the first homelessness assessment, particularly for males. For individuals facing homelessness on multiple occasions, they are more likely to be admitted to hospital and for longer periods. The most common reason for admission to hospital amongst homeless individuals is for drugs, alcohol and mental health issues, as well as injury and poisoning. The homeless population also have more outpatient appointments, particularly amongst males aged 31-40 and females aged 26-30.

The homeless cohort have more prescriptions than the rest of the population, especially for opioid and alcohol dependence. There are also more prescriptions for mental health. Homeless individuals aged 21-25 had the most prescriptions for alcohol dependence compared with the non-homeless population. Those aged 31-35 in the homeless population had the most prescriptions for mental health.

The homeless population have more acute mental health admissions, with more admissions in the 26-50 year age range. They also have more Scottish Drugs Misuse Database assessments, with the majority being for heroin but also with high results for crack cocaine, methadone, diazepam and cannabis. Drugs-related deaths are higher amongst individuals facing repeat homelessness.

Evidence on different disabilities

Physical disabilities

Please see evidence sources [Health and Homelessness in Scotland](#), [Homelessness in Scotland: 2024-25](#), [Crisis homelessness monitor for Scotland 2024](#) and [Shelter/housing options, supports and interventions for older people experiencing homelessness](#).

Learning disabilities

Please see evidence source [Homelessness in Scotland: 2024-25](#)

Mental health

Please see evidence sources [Health and Homelessness in Scotland](#), [Homelessness in Scotland: 2024-25](#), [Crisis homelessness monitor for Scotland 2024](#) and [Shelter/housing options, supports and interventions for older people experiencing homelessness](#).

Sex

Statistics

- **SLAB's data**

CLAO Edinburgh Homeless Helpline contacts data (2023-2025) (internal only).

Over the course of April 2023 until March 2024, 78% of the cases reaching CLAO Edinburgh's Homeless Helpline service involved individuals identifying as male. On the other hand, 22% involved individuals identified as female. From April 2024 until March 2025, these statistics changed to 82% male and 18% female.

- **Data relevant to the policy**

The Scottish Government [Homelessness in Scotland: 2024-25](#) report states that 58% of main applicants for homeless households were male, in comparison with 48% of the Scottish population over the age of 16 being male. 84% of those reporting rough sleeping in the previous three months were men. Additionally, men are more likely to become homeless from prison and privately rented sector share properties. Men account for 86% of cases where temporary accommodation was not offered and 72% of breaches of the Unsuitable Accommodation Order 2014.

Women are more likely to become homeless from privately rented tenancies. Women are also more likely to become homeless because of a violent or abusive household dispute (23% female, compared to 5% male).

Engender's report, [A Woman's Place: Gender, Housing and Homelessness in Scotland](#), published in February 2020, highlights that women's housing situations rest heavily on their unequal access to resources and safety, as well as by gendered roles that see women undertake most of the unpaid care work. They represent the majority of renters in social housing and the minority of homeowners in Scotland.

On page 10 of the [report](#), it states:

“... 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...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.”

It identifies various risks and inequalities faced by women in the housing and homelessness sphere. Women’s housing situations are generally worse than those of men; they are more likely to face housing affordability problems, and their specific needs are not well understood or appropriately met. Their access to safe and adequate housing is particularly impacted by women’s economic inequality and by men’s violence against women.

Women are more likely to be disadvantaged in the labour market, including engaging in part-time, precarious and/or low-paid employment and unpaid care work. They are twice as dependent on social security payments as men in the UK. This has a direct impact on their housing. Households made up of single women or lone mothers are over-represented in poor housing circumstances.

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. This causes low levels of mental health and emotional wellbeing amongst women and children.

There are rising numbers of homeless applications being made by women, including where the main reason given is domestic abuse. On page 14 of the [report](#), it says *“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.”*

However, it also advises that women tend to have shorter episodes of ‘absolute homelessness’ or sleeping rough than men. This is partly because women take additional extreme measures to avoid street sleeping, including finding alternative, temporary and often volatile accommodation. This includes sofa surfing and re-entering relationships with potentially abusive partners. This can also include the practice of male landlords offering accommodation to women in return for sex (“sex for rent”), which may affect vulnerable women if they are unable to access temporary accommodation from the local authority. There is also a clear and reciprocal link between women selling sex and homelessness.

Single men continue to dominate the numbers for sleeping rough and using mainstream shelter systems in most UK studies. However, rough sleeping remains a common housing situation for single women when they first enter homelessness. These women will employ strategies of invisibility to stay safe, such as avoiding busy areas and sleeping in secluded locations, or simply disguising their homelessness status. Large numbers of women in precarious housing situations will not engage with homeless services, partly due to perceived stigma/shame, and because homeless services are not designed for women and do not understand or respond to their needs.

Domestic abuse is a major cause of women’s homelessness in Scotland. It is the third most common reason given for a homeless application, and is the main reason given for women applicants. The

experience of homelessness can cause women to be more vulnerable to further violence. Homeless women are more likely to have experienced greater levels of sexual and emotional abuse than men.

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% having a mental health issue.

The Scottish Government [Homelessness prevention duties: equality impact assessment results](#) show:

In 2022-23, 67% of homeless applications were made from single person households, 46% of which were single male and 21% female

Single parent households accounted for 20% of applications and 15% of these were from single parent female households

Women earn less on average than men and are less likely to be paid the Living Wage. They are more likely to not be working due to looking after children or home.

The Wealth in Scotland report (not currently available due to website updates by Scottish Government) shows that women are less likely to own property than men, and lone parents (92% in Scotland are women) and working aged women with no children are the least likely groups to own property. It is likely that women in Scotland are more likely to be in receipt of Housing Benefit or the housing element of Universal Credit than men.

Women may be at risk of experiencing hidden homelessness and of being missed in official statistics. [Research by Engender](#) suggests that the nature of their homelessness does not always conform with the traditionally male images of rough sleeping on the street. Women often turn to less visible solutions, such as staying with family and friends on an informal/temporary basis, sofa surfing, sleeping on floors or in overcrowded spaces, sleeping in B&B/hostels and re-entering relationships with potentially abusive partners.

There are gendered differences in the reasons for homelessness. Men are most likely to become homeless due to being asked to leave or a non-violent household dispute. Women are most likely to be homeless due to a violent or abusive household dispute or being asked to leave.

In 2022-23, nearly a quarter of women making a homeless application cited the reason as abuse or violent dispute within the household. It is likely that the scale of the domestic abuse problem is under-represented in homeless applications, as many women will not disclose domestic abuse when applying.

For minority ethnic women, isolation, language difficulties and experiences of racism may increase their risk of experiencing homelessness.

[Evidence on women](#)

Please see evidence sources [Homelessness in Scotland: 2024-25](#), [A Woman's Place: Gender, Housing and Homelessness in Scotland](#) and [Homelessness prevention duties: equality impact assessment results](#).

[Evidence on men](#)

Please see evidence sources [Homelessness in Scotland: 2024-25](#) and [Homelessness prevention duties: equality impact assessment results](#).

Race

Statistics

- **SLAB's data**

1. CLAO Edinburgh Homeless Helpline contacts data (2023-2025) (internal only).

Over the course of April 2023 until March 2024, the equalities statistics for national identity cases reaching CLAO Edinburgh's Homeless Helpline Service were:

- 51% Other
- 33% Scottish
- 9% British
- 7% No data.

Over the course of April 2023 until March 2024, the equalities statistics for ethnicity cases reaching CLAO Edinburgh's Homeless Helpline Service were:

- 38% White
- 30% African, Scottish African or British African
- 14% Other Ethnic Group
- 9% Caribbean or Black
- 9% No data/prefer not to say.

From April 2024 until March 2025, the statistics for national identity for the Homeless Helpline were:

- 42% Other
- 30% Scottish
- 16% British
- 6% English
- 6% No data.

From April 2024 until March 2025, the statistics for ethnicity for the Homeless Helpline were:

- 46% White
- 24% African, Scottish African or British African
- 15% No data/prefer not to say
- 4% Asian, Scottish Asian or British Asian
- 4% Caribbean or Black
- 4% Mixed or multiple ethnic groups
- 3% Other ethnic group.

2. Written EqIA interview dated 24 July 2025 with Senior Civil Casework Solicitor, CLAO Edinburgh (internal only). The staff member states:

"I would say that the vast majority, if not all, of our Helpline clients have either the protected characteristic of race or of disability, or both... I don't have the statistics to hand, but I would say that more than half of the clients who have used the Helpline in the last couple of months have been refugees and would have the protected characteristic of race. We are receiving a lot of referrals from other agencies for people who have recently left Home Office accommodation. After leaving Home Office accommodation, they can make a homeless application at any local authority and that local

authority will then have a duty to secure temporary accommodation for their occupation. However, people taking these steps are often told by the local authority that there is no accommodation. I don't know whether refugees, who have the protected characteristic of race, are more likely than others to be told by the local authority that there is no accommodation, but I do know that we are seeing an increased demand from refugees."

Note that here, the term 'refugee' is used to cover people who have been granted refugee status and/or humanitarian protection.

Evidence on people whose first language is not English

1. CLAO Edinburgh Homeless Helpline Pie Charts 2023-25 (internal only).

Over the course of April 2023 until March 2024, 30% of the cases reaching CLAO Edinburgh's Homeless Helpline service required access to an interpreter for access to legal assistance and representation. This increased to 33% from April 2024 until March 2025.

In terms of preferred contact language, this was noted as 68% of cases being English speakers, 25% of cases requiring an Arabic interpreter and 7% requiring interpretation of another language from April 2023 to March 2024. The following year, these statistics changed to 66% English speakers, 21% Arabic and 13% for 'other language'.

2. Written EqIA Interview dated 29 July 2025 with Senior Civil Casework Solicitor, CLAO Edinburgh (internal only).

The staff member at CLAO Edinburgh was asked about their experience of the impact of the outcomes of the Homeless Helpline on clients, particularly those with protected characteristics under the Equality Act 2010. The response included the following:

"A significant proportion of our clients have protected characteristics. Many are people who have recently been granted refugee status and have accordingly had to leave Home Office accommodation. Most of these clients speak little or no English and we are able to assist due to our use of telephone interpreting services. The Council's emergency homelessness number does not provide any interpreting services so many of these clients have been discriminated against by the local authority on the basis of their race."

The staff member was asked about their views/comments on Homeless Helpline client demographics based on their past and current experiences of covering the Helpline, and if they noticed that some groups are more likely to access this service. The response stated that *"most of our clients have race as a protected characteristic."*

Evidence on different ethnicities

Scottish Government's [Homelessness in Scotland: 2024-25](#) report shows there were increases in homeless applications being made by individuals with refugee or leave to remain status, as well as Ukrainian nationals lawfully present via the Ukraine Family Scheme or Homes for Ukraine visa scheme (from 4,320 to 4,960).

One fifth (20%) of these were in Edinburgh, accounting for over a quarter (980 out of 3,785) of their applications. The homeless population has a much lower proportion with White ethnicity versus Scotland overall, with 2024-25 being the lowest in the time series. Numerical decreases were experienced across all 'White' ethnicities between 2023-24 and 2024-25. The ethnicity with the largest increase was 'Arabian'. Those of 'White Scottish' ethnicity are the most likely to be reassessed as

homeless compared to other ethnicities. ‘White Scottish’ and ‘White Other British’ main applicants are more likely to have a support need than any other ethnicity.

Engender’s report, [A Woman’s Place: Gender, Housing and Homelessness in Scotland](#), published in February 2020, highlights that women from minority ethnic groups are over-represented amongst hotel and B&B residents in local authority temporary accommodation.

The proportion of Black and Minority Ethnic (“BME”) women turned away from domestic violence refuges is higher than for white women.

Homeless 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 applications for women in these groups, as opposed to 22% of women in total.

The Centre for Homelessness Impact’s [Ethnic inequalities and homelessness in the UK](#) report, published in December 2022, states that there is significant over-representation of people from ethnic minorities amongst people experiencing homelessness. This is due to the way that different ethnic groups are positioned in society. However, this varies geographically and by race type.

In Scotland, 92% of the population are White Scottish/British. The largest ethnic minority groups are White Other (1.9%), White Polish (1.2%), Pakistani (0.9%), Indian (0.6%) and Chinese (0.6%). There is also African Scottish/British (0.6%) and Caribbean Scottish/British (0.1%).

The drivers of ethnic inequalities in the UK include migration history and integration, racism and discrimination, and cumulative intersecting disadvantage. Adapting to a new society can be challenging. Building social connections and embedding into society, as well as navigating new social structures and expectations, is demanding. These factors increase vulnerability of ethnic minority groups to homelessness.

On page 26 of the [report](#), it quotes from the 2021 [Racial Inequity and Homelessness: Findings from the SPARC Study](#) report which states that *“factors associated with homelessness for people of colour include barriers to housing and economic mobility, racism and discrimination within homeless services, and involvement in multiple systems, including criminal justice.”*

There is also a disproportionate experience of poverty amongst ethnic minority groups in the UK, which is a fundamental driver of homelessness. Ethnic minority groups can also face barriers in access to homelessness services due to stigma, discrimination and racism, as well as lack of access to culturally competent services. These groups may have mistrust in service providers because of past treatment, and a detrimental impact on their mental health.

The three ethnicities most likely to experience housing disadvantage in Scotland are Bangladeshi, Black African and Black Other. The three ethnicities least likely to experience this are White British, White Irish and White Other.

White Scottish, White Other British, White Irish, Asian and Mixed ethnic groups are under-represented amongst the homeless population in Scotland. White Other, White Polish, African, Caribbean and Other ethnic groups are over-represented. The number of Caribbean or Black people affected by homelessness in Scotland is more than twice the proportion expected according to population size. For Other ethnic groups, this is four times the number.

Street homelessness is most common for White Irish and White Other British. Asian households are the most likely to experience homelessness because of violent household disputes. There is a lack of informal support in the UK for individuals facing homelessness who are socially isolated, which includes asylum seekers/refugees and ethnic minority people fleeing domestic abuse.

It is therefore clear that ethnic disadvantage in homelessness is prevalent.

The Coalition for Racial Equality and Rights report, [Ethnicity and Homeless in Scotland: An analysis of the rates and causes](#), published in April 2023 states that homeless applications from white ethnic groups have been slowly decreasing since 2009. However, those from BME groups have doubled from 5 to 10% of total homeless applications, from 2009-10 to 2021-22. Between 2019-20 and 2021-22, for the BME categories, there has been an increase of 211 (6%) of applications. In comparison, there was an overall decrease of 2,470 (-8%) from individuals in the white ethnic categories over the same period. Between 2020-21 and 2021-22, those in the Caribbean or Black ethnic category had the highest rate of increase at 64%. Therefore, BME people are over-represented in the Scottish statutory homelessness statistics.

Migrants with No Recourse to Public Funds will have restricted or no access to welfare benefits and services, including social housing. Without access to public funds as a safety net, the likelihood of homelessness and destitution is heightened.

When granted refugee status, if a person has been living in accommodation for asylum seekers, they then need to move. In 2021-22, Glasgow recorded the largest numerical increase in homeless households compared to the previous year, which is partly attributed to the larger number of applications from those granted refugee status or leave to remain.

In Scotland, BME people are more likely to be in poverty than white people, which has been linked to higher rates of homelessness in some ethnic groups. This is due to disadvantages in the labour market and the tendency to reside in the private rented sector, where housing costs are higher. BME people are twice as likely to be in relative poverty after housing costs than white British people. This means that BME people are at higher risk of falling into rent arrears which can lead to eviction and homelessness.

Furthermore, structural racism in the housing market can lead to worse outcomes for BME people. BME workers are over-represented in lower paid employment sectors and undertake more precarious work.

Overcrowding is a main factor contributing to homelessness across various ethnic minority groups. In 2016, the Equality and Human Rights Commission reported that in Scotland, ethnic minority families are almost four times more likely to be in an overcrowded household and up to two times more likely to be living in poverty and experiencing unemployment. Some BME households are more likely to be larger, including due to having over three dependent children and/or multi-generational households. Therefore, BME households are at higher risk of homelessness due to health issues resulting from overcrowding, relationship breakdown and intergenerational conflict.

Other main reasons for causes of BME homelessness are domestic abuse, relationship breakdown, conflict with in-laws and between children and parents. BME victims of domestic abuse are less likely to be aware of different services and housing options available to them.

Over 2021-22, 24% of Asian, Asian Scottish or British applicants gave violent disputes within the household as their reason for homelessness. Asian cultures have a greater degree of cultural tolerance of what, for contemporary western agencies, would constitute domestic violence (for example, honour-based abuse). However, this may only present in certain extreme traditionalist households and not all South Asian households.

For young Black Caribbean women, many become homeless whilst pregnant if family and friends are no longer able or willing to house them. This is linked to overcrowding, conflicts due to the pregnancy and difficulties having an infant in the household. For some Black African households, relationship breakdown could arise due to difficulties in migrating and adapting to a different culture, particularly different gender roles and expectations. 'Cultural conflict' between young BME people and their older family members due to changing values has resulted in larger numbers of younger people becoming homeless.

Gender reassignment

Evidence on trans people

- **SLAB's data**

We do not collect data on gender reassignment for applicants to the CLAOE HHL.

- **Data relevant to the policy**

The [Scottish Trans and Non-binary experiences: research report](#) analysed a sample of 571 people (respondents) living in Scotland who identified as transgender or non-binary. However, not all respondents answered all the questions, and some only partly responded to the survey. Note that the reference to numbers below for this report refer to the number of respondents who answered each question.

At page 85 of [this report](#), it states that respondents to the survey were probably more likely to be homeless than the general population (1% or 511 respondents vs 1% of the general population). This is because the Scottish figures for the general population include children. Respondents had experienced homelessness at a substantially higher rate than the general population (23% or 497 respondents vs 8% of general population).

40% of respondents who had previously experienced homelessness (119) had done so more than once. 35% of respondents who faced homelessness confirmed that their trans status, history and/or gender identity contributed to them being homeless. The [report](#) states on page three that 11% of respondents were unsure.

Themes that emerged from respondents who disclosed that their trans status, history or gender identity led to their homelessness included being kicked out by parents/family breakdown, gender-based violence, discrimination from landlords and discrimination at work leading to loss of income. Familial rejection after coming out is a significant risk factor for homelessness. Also, transgender and non-binary individuals are at risk from transphobic abuse and harassment from neighbours. They may face unfair barriers in accessing homelessness services due to issues relating to proof of identity.

These incidences of homelessness were confirmed by respondents (119) to be exacerbated by additional protected characteristics, including disability (71%), sexual orientation (27%), gender (19%), age (15%), race, ethnicity and nationality (14%) and religion or belief (7%). Other aspects of

their identity contributed to homelessness, including mental health, immigration status and discriminatory attitudes towards those on benefits due to being disabled.

Of respondents who had experienced homelessness, the largest proportion (45%) had not made a homeless application. Whereas 34% of respondents had made an application every time they had become homeless. 21% of respondents had made a homeless application on some occasions, but not others (119). People who were staying with friends or sofa surfing did not realise that making a homeless application was relevant to them. Other reasons that respondents did not make a homeless application was due to negative experiences, discrimination or a lack of faith that they would be helped. Some respondents explained they had experienced homelessness as a child, so it had not been their responsibility or had been unable to make a homeless application.

Out of 64 respondents who had made a homeless application, 78% felt their trans status, history or gender identity had not impacted on their homeless application, or the support they requested from a local authority. 11% felt it had only negative impacts, 6% felt it had both positive and negative impacts and 5% felt it had only positive impacts.

Furthermore, 35% of respondents (20) who stayed in a hostel felt that their trans status, history or gender identity had a negative impact on their experience. This was also the case for 30% (36) of those who stayed in temporary accommodation and 27% (15) of those who had stayed in emergency accommodation.

Stonewall commissioned YouGov to carry out a survey in 2018, [LGBT in Britain – Home and Communities](#), asking more than 5,000 lesbian, gay, bi and trans (LGBT) people across England, Scotland and Wales about their life in Britain today.

One in four trans people (25%) have experienced homelessness at some point in their lives, compared to one in six LGBT people (16%) who are not trans.

The Centre for Homelessness Impact report from June 2022, [Sexuality, gender identity and homelessness: Incidence, experience and evidence of homelessness among LGBTQ+ people](#), states that trans people are more likely to be victims of rape than other LGBTQ+ young people experiencing homelessness. This means they often find themselves having to engage in drugs, alcohol, sex work or transactional sex to secure a 'safe space' to avoid rough sleeping.

Transgender people affected by homelessness have faced prejudice from service users and staff when accessing refuge and accommodation services. For example, some transgender young people have been denied access to single-sex services. The Scottish Commission on LGBT Housing and Homelessness found that homeless transgender young people were denied access to single-sex spaces, leaving them either in riskier, multi-sex services, or unable to access services at all.

Sexual orientation

Statistics

- **SLAB's data**

We do not collect information on the sexual orientation of applicants to the CLAOE HHL.

- **Data relevant to the policy**

Stonewall's 2018 [LGBT in Britain – Home and Communities](#) report states that almost one in five LGBT people (18%) have experienced homelessness at some point during their lives. This number increases

to 28% of LGBT disabled people. LGBT in lower income households are more likely than LGBT people in higher income households to have experienced homelessness, being 25% compared to 15%.

Furthermore, 24% of non-binary people, 20% of LGBT women and 15% of LGBT men have experienced homelessness.

The Crisis [About LGBT+ homelessness](#) support page on their website highlights that individuals who are LGBTQ+ are more likely to experience homelessness. Research from Stonewall shows that almost one in five LGBT people have experienced homelessness at some point in their lives. Rates are even higher amongst trans people, with 25% having experienced homelessness at some point. According to the charity, [akt](#), 77% of LGBTQ+ young people gave 'family rejection, abuse or being asked to leave home' as a cause of their homelessness.

The foreword from The Centre for Homelessness Impact report from June 2022, [Sexuality, gender identity and homelessness: Incidence, experience and evidence of homelessness among LGBTQ+ people](#), states:

"There are many reasons why people who identify as LGBTQ+ may be at greater risk of homelessness. Despite a significant liberalisation of attitudes and legislation relating to sexuality in the past three decades, sexual and particularly gender identity still generate prejudice and, sometimes, hostility, harassment and worse. Young people who feel uncomfortable to be open about their sexual orientation or gender identity may leave the family home before they might otherwise have done so or be forced to leave. They are more likely to enter local authority care, which carries a higher likelihood of subsequent homelessness. They are more likely to experience poorer mental health, another factor associated with homelessness. Accessing homelessness services may also present additional challenges or complexities for people who identify as LGBTQ+ meaning they are less likely to receive timely or appropriate support."

The [2020 Rough Sleeping Questionnaire](#) found that 7% of 563 respondents identified as homosexual or bisexual, with 1% identifying as 'other' and 5% not responding to the question. Even 7% is almost four times higher than the rate identifying as LGBTQ+ in the ONS population survey.

LGBT people often experience discomfort and lack of safety, even in their own home, because of prejudice and discrimination whilst residing with family members or other individuals who are not supportive of their sexual orientation or gender identity. The [2017 National LGBT survey](#) found that 29% of respondents had experienced an incident involving someone they lived with due to being LGBT, including most commonly verbal harassment, disclosure of their LGBT status without permission and coercive/controlling behaviour. These incidents can result in LGBT individuals, particularly those who are young and coming out for the first time, leaving home before they are ready and without a safety net. 24% of young people experiencing homelessness identify as LGBTQ+.

LGBT people are less likely to come forward to seek support with homelessness due to fear of homophobic, biphobic or transphobic responses from service providers. This may prevent LGBTQ+ people impacted by homelessness from accessing the services they need the most.

Research published by the Albert Kennedy Trust in 2015 found that LGBT young people were more likely to find themselves homeless than their other peers (24%). They are also more likely to enter local authority care, which carries a higher likelihood of subsequent homelessness.

According to [akt's 2021 homelessness LGBTQ+ report](#), around two thirds of people felt that their sexual or gender identity was a contributing factor to their homelessness episodes. A similar survey conducted by akt found that 77% felt that their sexual/gender identity was a causal factor in their rejection from home. For example, this may be due to LGBTQ+ people being evicted or thrown out of family homes when their sexuality or gender identity was made known to their families, with 51% of respondents to akt's survey indicating they felt at risk of eviction due to these factors.

Many LGBTQ+ people reported feeling threatened, or at risk of violence, prior to their homelessness, from members of their families (61%) or romantic partners (20%), leading to homelessness. Additionally, LGBTQ+ people are more likely to experience institutional (for example foster/residential) care, mental health challenges, substance use or participation in street culture activities. These are examples of multiple exclusion homelessness, which are overlapping experiences often faced by LGBTQ+ people that can increase the likelihood of homelessness.

LGBTQ+ people report not feeling like they receive the appropriate support from local authorities, as well as feeling reluctant to disclose their sexual orientation/gender identity to mainstream service providers. 59% have faced some form of discrimination or harassment whilst accessing services. There is also a significant lack of LGBTQ+ appropriate refugee and emergency accommodation, and general services do not tend to cater for their needs.

For those rough sleeping, LGBTQ+ people have increased vulnerability and exposure to violence, including hate crimes, sexual exploitation and problematic substance use than their heterosexual counterparts.

The report [Not Just a 'Youth Problem': LGBT+ Experiences of Homelessness Across the Life Course in Fife, Scotland](#) presents the results of a study in Fife, the third largest local authority in Scotland, focusing on 14 in-depth interviews with LGBT+ people from across age groups who had experience of or been at risk of homelessness.

It is widely recognised that LGBT+ people are over-represented in the homeless population. LGBT+ homelessness is not just a youth problem. Rejection by family and partners for 'coming out' is a unique reason for LGBT+ people becoming or being at risk of homelessness. Fluidity and confusion around gender identity combined with poverty and rurality exacerbate the experience of homelessness.

The European Union Agency for Fundamental Rights estimates that in the EU, one in five LGBT+ young people experience homelessness, rising to one in three for trans people and nearly 40% for intersex people. In the UK, whilst only 5% of people identify as LGBT+, it is estimated that they make up 25% of all homelessness. The LGBT+ population experience higher rates than the general population of poverty, problematic substance use, self-harm, suicide, poor mental health and isolation.

The vulnerability of LGBT+ homelessness is closely aligned to the discomfort of being queer in a heteronormative society. This includes the perception and experience of prejudice towards them as LGBT+ and the risk of abuse was a particular barrier to seeking help. Some respondents were wary due to having negative perceptions about the quality of housing they could access, how others might react to their sexuality and the risk of abuse, as well as the resulting impact on their mental health.

LGBT+ people are at particular risk of hidden homelessness as a result of the combination of a reluctance on the part of some to be open about their identity due to fear of intolerance and abuse, a

lack of knowledge about and suspicion of the role of support services, and the absence of systematic recording of sexual and gender identity in housing and homelessness records.

For LGBT+ people, home can be an especially important, if not crucial, space for self-acceptance of one's identity.

Evidence on gay men

Please see evidence sources [Sexuality, gender identity and homelessness: Incidence, experience and evidence of homelessness among LGBTQ+ people, 2017 National LGBT survey, akt's 2021 homelessness LGBTQ+ report](#) and [Not Just a 'Youth Problem': LGBT+ Experiences of Homelessness Across the Life Course in Fife, Scotland](#).

Evidence on gay women/lesbians

Please see evidence sources [Sexuality, gender identity and homelessness: Incidence, experience and evidence of homelessness among LGBTQ+ people, 2017 National LGBT survey, akt's 2021 homelessness LGBTQ+ report](#) and [Not Just a 'Youth Problem': LGBT+ Experiences of Homelessness Across the Life Course in Fife, Scotland](#).

Evidence on bisexual people

Please see evidence sources [Sexuality, gender identity and homelessness: Incidence, experience and evidence of homelessness among LGBTQ+ people, 2017 National LGBT survey, akt's 2021 homelessness LGBTQ+ report](#) and [Not Just a 'Youth Problem': LGBT+ Experiences of Homelessness Across the Life Course in Fife, Scotland](#).

Religion or belief

Evidence on different religions

- **SLAB's data**

We do not collect data on the religion of applicants to the CLAOE HHL.

- **Data relevant to the policy**

The [Homelessness prevention duties: equality impact assessment results](#) document states that Scottish Government are not aware of any evidence to show that religion or belief impacts on homelessness. According to the 2022 Scottish Survey Core Questions, the most common religious designation across all housing tenures is 'no religion'. People who live in both the private and social rented sector are more likely to identify as being 'Muslim' or 'other religion' compared to those who are property owners. In 2018-23, Muslim adults and adults identifying as 'other religion' were more likely to be in relative poverty (61% and 31% respectively). This is compared to adults in relative poverty overall (19%) and adults belonging to the Church of Scotland (16%).

Pregnancy or maternity

- **SLAB's data**

We do not collect data on the pregnancy or maternity of applicants to the CLAOE HHL.

- **Data relevant to the policy**

The Scottish Government [Homelessness prevention duties: equality impact assessment results](#) show that in 2022-23, 51% of all single adult female households, where the main reason for homelessness was a violent or abusive dispute, were single parent households. This compares to 42% overall.

Households with children under the age of one are at heightened risk of poverty, and families with a new child are more likely to enter poverty. This suggests such households may be at increased risk of experiencing homelessness.

The [Homelessness in pregnancy](#) study evaluates the association with homelessness or refuge accommodation on delivery and short-term perinatal outcomes in an Irish tertiary maternity hospital.

Family homelessness often involves lone women with dependent children. Pregnancy rates in young homeless women are high. It has been estimated that approximately 13% of female homeless youth are pregnant at any given time and 73% of these pregnancies are unplanned. Homelessness and unstable housing in pregnancy is independently associated with adverse perinatal and neonatal outcomes including pre-term birth, low birth weight, neonatal unit admission and intrauterine death.

Women in the homeless/refuge population are statistically more likely to be single (75.2% vs 39.5%), have an unplanned pregnancy (73.7% vs 27.2%), report a history of psychiatric illness (42.9% vs 22.4%), experience domestic violence (18.8% vs 0.9%), consume alcohol in pregnancy (3.0% vs 0.8%) or smoke in pregnancy (41.3% vs 9.7%).

Women experiencing homelessness during pregnancy are significantly more likely to have a pre-term birth. They also had a significantly lower median birth weight. Therefore, women facing homelessness are more likely to experience poorer perinatal outcomes compared to women with stable living arrangements.

Marriage/civil partnership (only applies to policies related to employment)

N/A – only for policies relevant to employment. Not required for this EqlA.

Care Experienced

Evidence on care experienced people

- **SLAB's data**

CLAO Edinburgh Homeless Helpline contacts data (2023-2025) (internal only).

Over the course of April 2023 until March 2024, 7% of cases approaching CLAO Edinburgh's Homeless Helpline Service involved individuals who had care experience. For 9% of cases, there was no response. The following year, the number of cases involving care experienced individuals rose to 14%. The number of N/A cases was 8%, and 7% had no response.

- **Data relevant to the policy**

The Centre for Excellence for Children's Care and Protection's briefing, [Challenge of Homelessness faced by Scotland's care experienced Young People](#), published May 2019 reports that young people leaving care are at greater risk of homelessness than their peers despite their need for security and the obligations of Scotland's public sector. The reasons for this include the lack of practical, financial and emotional support and experience to run their own home at a very early stage of adulthood, in addition to the challenge of affording rent and managing change.

The [Homelessness and Care Experience – Beyond the headlines](#) report highlights that homelessness disproportionately affects the lives of looked after children and care leavers who are over-represented in homeless applications compared to their peers. Young people leaving care are often expected to leave their home at an earlier age, with less preparation, and with less support than young people without care experience. Decisions can be made arbitrarily, based on the person's age rather than

their needs. Unlike their peers, it is very unlikely that care leavers will have the option to return if their life becomes overwhelming, which can lead to homelessness.

A lack of suitable housing can create barriers to participation in education, employment and training, as well as accessing other services, such as registering with a GP. Care leavers feel the impact of poverty and socioeconomic disadvantage disproportionately and are at greater risk of homelessness. Care leavers in their own accommodation can also quickly become overwhelmed by the enormity of managing independently, leading to ending their new tenancy/accommodation arrangement and facing homelessness.

The Independent Care Review 2020 report, [The Money](#), highlights that a lack of planning by services around transitions out of care can result in young people risking homelessness. Care experienced children often lack the safety net that families can provide. For example, the average age of a child leaving the family home is 25. In contrast, the average age of leaving care is between 16 and 18 years old, the point at which the 'care system' effectively treats children as adults and expects self-reliance. Yet, this is the population with invariably fewest resources/income to be self-reliant.

Care experienced adults are more than twice as likely to have experienced homelessness, mainly before the age of 30. They are more likely to experience a range of problems or disadvantages including unemployment, domestic abuse, mental and physical ill-health, offending and substance misuse. Some care experienced individuals are not taught to manage money.

The Centre for Homelessness Impact report from June 2022, [Sexuality, gender identity and homelessness: Incidence, experience and evidence of homelessness among LGBTQ+ people](#), states that young people with care experience are more likely to be impacted by homelessness than their peers. 26% of young people leaving care had 'sofa surfed' and 14% had slept outside. The National Audit Office reports that in 2010, 25% of people experiencing homelessness had been in care at some point in their lives.

The [Homelessness prevention duties: equality impact assessment results](#) show that care experienced children and young people, and those leaving care, are more likely to face challenges, including mental health issues, poor education outcomes, lower educational attainment and a lower likelihood of achieving a positive destination when they leave care. They are at much higher risk of homelessness or experiencing housing instability compared to their non-care experienced peers.

2.2. Using the information above and your knowledge of the policy/practice/process/service, summarise your overall assessment of how important and relevant it is likely to be for equality groups.

Having reviewed both external and internal CLAOE HHL data sources, it is evident that the HHL Pilot has a positive impact on individuals with most relevant protected characteristics. The exceptions are marriage and civil partnership, which is not relevant to this EqIA, and religion, for which there is no impact as evidence does not show any clear links between religion and homelessness. The most relevant protected characteristics are disability, gender and race.

2.3. Outcome of Step 2 and next steps. Select the outcome below to inform the next stage of the EqIA process.

Please select your decision: Proceed to Step 3 - complete full EqIA.

Please outline the reasoning behind your decision:

The CLAOE HHL Pilot service is relevant to most protected characteristics and corporate parenting duties. The exceptions are marriage and civil partnership, which is not relevant to this EqIA, as it applies only to policies related to employment and religion, for which there is no impact as evidence does not show any clear links between religion and homelessness.

Step 3: Stakeholder involvement and consultation

3.1. Do you/did you have any consultation or involvement planned for this policy/practice/process/service?

No.

3.2. List all the stakeholder groups that you will talk to about this policy/practice/process/service.

Please see [History of CLAO homeless services](#) section at 1.1 above for further information about the third party advice agencies that CLAOE regularly meet and consult with, and from whom we regularly accept referrals to the HHL service. This includes attending Homelessness Services Update meetings and taking part in the Homelessness Justice Legal Collaboration (HJLC) in an observer capacity.

3.3. What did you learn from the consultation/involvement?

Please see [History of CLAO homeless services](#) section at 1.1 above for further information.

Step 4: Impact on equality groups and steps to address these

4.1. Does the policy/practice/process/service have any impacts (whether intended or unintended, positive or negative) on any of the equality characteristics?

Age

Potential for discrimination: Positive impact(s).

Potential for developing good relations: No impact.

Potential to advance equality: Positive impact(s).

Describe the changes or actions you plan to take.

The CLAOE HHL service enables us to assist a larger number of individuals than would otherwise be possible who are facing rough sleeping or sofa surfing in situations where the local authority has failed to provide temporary accommodation in compliance with their legal duties. This is an area of legal work that is already within CLAO's core casework remit. The service can be accessed by any individuals facing this situation, regardless of age. Our service achieves positive outcomes by securing temporary accommodation. CLAOE record each client's date of birth for the purpose of obtaining equalities statistics and filling out legal aid applications.

Disability

Potential for discrimination: Positive impact(s).

Potential for developing good relations: No impact.

Potential to advance equality: Positive impact(s).

Describe the changes or actions you plan to take.

At the outset of a HHL case, CLAOE staff will ask all clients if they have a protected characteristic, such as a disability, and whether we can make any reasonable adjustments for them. CLAOE record each client's disability and support needs for the purpose of obtaining equalities statistics and filling out legal aid applications.

Many of the solicitors covering the CLAOE HHL service have received recent formal training in mental health first aid and trauma informed certification. This assists our solicitors in communicating with HHL clients who have mental health issues in a trauma-informed and compassionate manner. We take time where required to explain legal issues in layman's terms, and sometimes multiple times as required to ensure our clients understand.

Our solicitors liaise closely with other support services assisting HHL clients, such as Crisis and Streetwork, to facilitate communications when the individual does not have a mobile phone or email address. Solicitors will speak with HHL client's support workers, if consented to do so, to provide updates on the case. We encourage clients to engage with these support services for ongoing support after their HHL case has been concluded.

Securing temporary accommodation has a huge impact on the lives of people with both physical and mental health issues. It can enable people to access medical and support services in a sustained manner. Rough sleeping and sofa surfing is likely to cause deterioration in the health issues and associated symptoms for such individuals. The CLAOE HHL has a positive impact by assisting in securing temporary accommodation for these individuals.

Many HHL clients with health issues are happy to conduct appointments via telephone, however some may prefer to speak to a solicitor in person. However, the urgent nature of HHL work means we cannot offer in person meetings. It may be an option to offer a weekly in person drop in session, however CLAOE do not currently have sufficient staffing to facilitate this. We will monitor the frequency with which people request in person meetings to keep this option under review.

Sex

Potential for discrimination: Positive impact(s).

Potential for developing good relations: No impact.

Potential to advance equality: Positive impact(s).

Describe the changes or actions you plan to take.

The CLAOE HHL service assists individuals who are facing rough sleeping or sofa surfing in situations whereby the local authority has failed to provide temporary accommodation in compliance with their legal duties. The service can be accessed by any individuals facing this situation, regardless of sex. Our service achieves positive outcomes by securing temporary accommodation. CLAOE record each client's sex for the purpose of obtaining equalities statistics and filling out legal aid applications.

Race

Potential for discrimination: Positive impact(s).

Potential for developing good relations: No impact.

Potential to advance equality: Positive impact(s).

Describe the changes or actions you plan to take.

CLAOE record each client's race and ethnicity for the purpose of obtaining equalities statistics and filling out legal aid applications. CLAOE's HHL has a positive impact on many individuals who have recently been granted refugee status and left Home Office accommodation. By assisting refugees to secure temporary accommodation, this has an immediate positive impact on their lives and can be the first step in building a new life in Scotland. This includes being able to secure opportunities such as employment, educational studies and registering with medical services.

HHL solicitors use Global Languages interpreting services extensively for any clients whose native language is not English and have confirmed they require an interpreter for communications. Global Languages service allows us to phone up to request an interpreter without the need for a pre-arranged appointment. Global also offer translation services which we use for substantive letters, and we use Google translate for any urgent/brief emails and text messages.

Solicitors sometimes have to call the local authority's emergency out of hours homelessness phone number on behalf of our HHL clients as the council do not provide interpreters on this number.

Gender reassignment

Potential for discrimination: Positive impact(s).

Potential for developing good relations: No impact.

Potential to advance equality: Positive impact(s).

Describe the changes or actions you plan to take.

The CLAOE HHL service assists individuals who are facing rough sleeping or sofa surfing in situations whereby the local authority has failed to provide temporary accommodation in compliance with their legal duties. The service can be accessed by any individuals facing this situation, regardless of gender identity or transition/reassignment. Our service achieves positive outcomes by securing temporary accommodation.

Sexual orientation

Potential for discrimination: Positive impact(s).

Potential for developing good relations: No impact.

Potential to advance equality: Positive impact(s).

Describe the changes or actions you plan to take.

The CLAOE HHL service assists individuals who are facing rough sleeping or sofa surfing in situations whereby the local authority has failed to provide temporary accommodation in compliance with their legal duties. The service can be accessed by any individuals facing this situation, regardless of sexual orientation. Our service achieves positive outcomes by securing temporary accommodation.

Religion or Belief

Potential for discrimination: No impact.

Potential for developing good relations: No impact.

Potential to advance equality: No impact.

Describe the changes or actions you plan to take.

The evidence does not show any clear links between religion and homelessness.

Pregnancy & Maternity

Potential for discrimination: Positive impact(s).

Potential for developing good relations: No impact.

Potential to advance equality: Positive impact(s).

Describe the changes or actions you plan to take.

The CLAOE HHL service assists individuals who are facing rough sleeping or sofa surfing in situations whereby the local authority has failed to provide temporary accommodation in compliance with their legal duties. The service can be accessed by any individuals facing this situation, regardless of pregnancy or maternity. Our service achieves positive outcomes by securing temporary accommodation.

Marriage & Civil Partnership (only applies to policies related to employment)

This policy is not relevant for this protected characteristic.

Care experience

Potential for discrimination: Positive impact(s).

Potential for developing good relations: No impact.

Potential to advance equality: Positive impact(s).

Describe the changes or actions you plan to take.

The CLAOE HHL service assists individuals who are facing rough sleeping or sofa surfing in situations whereby the local authority has failed to provide temporary accommodation in compliance with their legal duties. The service can be accessed by any individuals facing this situation, regardless of care experience. CLAOE record if each client has ever been 'Looked After' by a local authority for the purpose of obtaining equalities statistics and filling out legal aid applications. Our service achieves positive outcomes by securing temporary accommodation. During provision of HHL advice and representation, solicitors may liaise with Children's Social Work within the local authority to ensure positive outcomes for young clients who have care experience.

4.2. Which actions have you taken as part of this assessment?

Please select the outcome of the assessment: Confirm that the policy/practice/process/service described in section 1.1 was robust.

Please explain the changes that have been made:

CLAOE HHL has had a positive impact on clients in respect of most relevant protected characteristics. The exceptions are marriage/civil partnership, which is not applicable as only for policies relevant to employment, and religion, for which there is no impact as evidence does not show

any clear links between religion and homelessness. Therefore, the HHL should be made a permanent service.

Step 5: Discuss and review the assessment with decision makers and governance structures

5.1. Record details of the groups you report to about this policy/practice/process/service and impact assessment. Include the date you presented progress to each group and an extract from the minutes to reflect the discussion.

- 2024-26: Regular reviews and updates between Policy staff and CLAO Edinburgh colleagues.

Step 6: Post-implementation actions and monitoring impact

6.1. Record any ongoing actions below

- Transition of the CLAOE HHL Pilot project into a permanent service.

6.2. Note here how you intend to monitor the impact of this policy/practice/process/service on equality groups

Measure	Lead department or individual	Reporting (where and frequency)
Review HHL internal equalities statistics every three years	Network Duty and Development Solicitor, CLAO Edinburgh	Head of Office, CLAO Edinburgh
Review HHL reasonable adjustments/support measures offered to/in place of HHL clients with protected characteristics every three years	Network Duty and Development Solicitor, CLAO Edinburgh	Head of Office, CLAO Edinburgh
Review the frequency with which people (particularly those with a disability) request in person meetings every six months	Network Duty and Development Solicitor, CLAO Edinburgh	Head of Office, CLAO Edinburgh

6.3. EqIA review date

Should be reviewed as part of the post-implementation review of the policy/practice/process/service. The date should not exceed three years from the implementation date.

01/07/2029.

Step 7: Assessment sign off and approval

Director/SRO sign off: 17/03/2026.

Chief Executive approval: 28/05/2026.