Midlothian

Rapid Rehousing Transition Plan 2019/20 – 2023/24

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1. Introduction

The Scottish Government established a Homelessness and Rough Sleeping Action Group (HARSAG) in 2017, which has made recommendations on ending rough sleeping and transforming the use of temporary accommodation through a Rapid Rehousing approach for homeless households, and also Housing First for people with complex needs.

The HARSAG recognises the fundamental role to be played by local authorities, housing providers, health and social care partnerships and the broad range of organisations that provide support. The HARSAG also recognises that in some localities the transition will not be straightforward and recommended a 5-year timescale for the transformation to rapid rehousing.

Rapid rehousing is about taking a housing-led approach for rehousing people that have experienced homelessness, making sure they reach a settled housing option as quickly as possible rather than staying in temporary accommodation for too long. Transition to a rapid rehousing approach means that some local authorities and partners will have to redress the balance of housing and support options that are available, and how quickly they are accessed.

The final recommendations of the Scottish Government's Homelessness and Rough Sleeping Action Group (HARSAG) were published in June, 2018. They recommended that:
- homelessness should be resolved through effective prevention wherever possible;
- homeless applicants should be rapidly resettled in a permanent housing solution;
- homeless applicants should have access to the widest range of housing options;
- temporary accommodation should only be used as a stop-gap;
- effective support should be available from day one to enable the homeless household to sustain their own tenancy, and
- supported accommodation should be available for that small minority of applicants who are not able to sustain their own tenancy at the present time.

Each local authority has been asked by Scottish Government to prepare a Rapid Rehousing Transition Plan by December 2018 which will be implemented from April 2019, demonstrating how they will move to a rapid rehousing model over a term not longer than five years. This will need to demonstrate not only how homelessness demand will be addressed, but also how any backlog of demand from homeless households currently in temporary accommodation will be addressed.

2. Midlothian Context

Midlothian has a population of 90,090 residents. The area has experienced a significant increase in population, having risen by 13% since 1997 – a substantially higher rate of growth compared to Scotland as a whole which grew by 7% during the same period. This rapid period of growth is set to continue, with the population projected to increase to 100,410 by 2026. Population growth of approximately 1,000 people per annum will continue to create challenges for the local housing market to accommodate this growing population.

The SESplan Housing Need and Demand Assessment, published in 2015, assessed housing need and demand in Edinburgh, Fife, East Lothian, West Lothian, Midlothian and the Scottish Borders. It noted that in order to address current and future housing need in Midlothian, the total additional number of homes required by 2032 was 8,247 – as shown in Table 1, below. The majority of need is identified for affordable housing compared to private housing. The SESplan Housing Need and Demand Assessment also informs the Housing Supply Target for each local authority. As a result of the examination of the Strategic Development Plan for the South East of Scotland, it has been recommended that the Housing Supply Targets as shown in Table 2 are implemented to meet identified need.

Table 1: SESplan Current and Future Housing Need, By Tenure 2012 - 2032

	Total Number of Homes				
Area	Social Rent	Below Market Rent	PRS	Owner Occupied	Total
Midlothian	4,624	947	787	1,888	8,247

Table 2: Recommendation of the Revised SESplan Annual Housing Supply Targets[1]

	Annual Number of Homes		
Area	Market	Affordable	Combined
City of Edinburgh	994	1,607	2,601
East Lothian	269	247	516
Fife	493	305	798
Midlothian	301	217	518
Scottish Borders	179	110	289
West Lothian	270	253	523
SESPLAN	**2,506**	**2,739**	**5,254**

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[1] Page 259, Report to Scottish Ministers on the Proposed SESplan Strategic Development Plan Examination, 20 July 2018

3. Housing in Midlothian

The most common housing tenure in Midlothian is owner occupied housing (66%) followed by Council housing (17%). Housing Association and Private Rented housing each represent 8% of the housing stock.[2] The supply of social rented housing and private rented housing is particularly important as the majority of homeless households will require rented accommodation in order that they can be suitably housed in permanent accommodation. Table 3, below shows that there are 10 RSLs who own housing in Midlothian. Midlothian Council (6,815 homes), Melville Housing Association (1,890 homes) and Castle Rock Edinvar Housing Association (967 homes) all have a significant supply of housing in the local area whereas the other providers have a smaller number of units, and are often providers of specialist housing, such as retirement housing.

Table 3: Registered Social Landlords in Midlothian

Registered Social Landlord (RSL)	Number of properties
Midlothian Council	6,815
Melville Housing Association	1,890
Castle Rock Edinvar Housing Association	967
Bield Housing Association	116
Dunedin Canmore Housing Association	88
Trust Housing Association	35
Viewpoint Housing Association	34
Blackwood Housing Association	23
Link Housing Association	20
Ark Housing Association	6

Table 4, below, shows the number of lets made by Midlothian Council in recent years. It shows that there has been an increase in lets made in recent years, which is due to recent new build development. The level of turnover of council housing in Midlothian is low, with a turnover rate of between 4% and 5% of council homes becoming available for relet. This is significantly below the national average which is 8%. Recent data on the number of lets made by housing associations is not available, however, older data is available and shows that the number of lets made by housing associations varied between 238 and 297 between 2009/10 and 2011/12. There is some fluctuation in letting figures due to the level of new building taking place in each year.

Table 4: Midlothian Council Housing Allocations 2015/16 – 2017/18

Year	Allocations Group						Total	
	Homeless List		Needs list		Choice List			
	Number	%	Number	%	Number	%	Number	%
2015/16	123	45%	120	44%	29	11%	272	100%
2016/17	106	35%	170	56%	26	9%	302	100%
2017/18	165	45%	174	48%	25	7%	364	100%

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[2] https://www.gov.scot/Topics/Statistics/Browse/Housing-Regeneration/HSfS/KeyInfoTables

Table 5: RSL Lets made 2009/10 – 2011/12 (excluding Midlothian Council)

Year	2009/10	2010/11	2011/12
No. of Lets	297	248	238

Midlothian Council has a target for letting 45% of its housing for homeless households. This target is higher than the average for Councils in Scotland and significantly higher when compared to the average for housing associations in Scotland. In total, 248 homeless households were provided with permanent social rented accommodation in 2017/18, of which 165 lets were made by Midlothian Council and 83 from other Registered Social Landlords.

Table 6 shows the number of private lets advertised in Midlothian, which has reduced in numbers during the last three years from 297 in 2015 to 238 in 2017. In addition, Table 7 below shows that a small number of households are no longer homeless as a result of obtaining a private rented tenancy.

Table 6: Homeless Lets by Landlord 2015/16 – 2017/18

Year	Proportion of Lets to Homeless		
	Midlothian	All Scottish Councils	All RSLs in Scotland
2015/16	45%	36%	31%
2016/17	35%	40%	33%
2017/18	45%	41%	33%

Table 7: Number of private rented sector lets in Midlothian 2015 - 2017[3]

Year	2015	2016	2017
No. of Lets	297	248	238

Table 8: Number of homeless applicants moving into private rented tenancy 2015/16 – 2017/18

| Year	2015/16	2016/17	2017/18
No. of Lets	3	0	10

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[3] Data obtained from www.zoopla.co.uk and may not capture all available private lets being advertised in a year.

4. Homelessness in Midlothian

Chart 1 below shows the annual number of households making a homeless application in Midlothian since 2007/08. It shows that the highest level of homeless applications took place in 2008/09 (871 applications). Since then there has been a significant reduction in the annual number of applications. A key reason for the decline in homeless applications is the increased focus on homeless prevention and providing housing options advice to those households who were at risk of becoming homeless. In addition, Table 9, below shows that the proportion of people presenting to Midlothian Council as homeless was close to the average for Scotland as a whole – approximately 6.4 persons per 1,000 people in Midlothian compared to 6.5 in Scotland. As of November 2018 there were 1,079 homeless cases where the Council has a duty to source suitable permanent accommodation.

Chart 1: Number of Homeless Applications in Midlothian 2007/08 – 2017/18
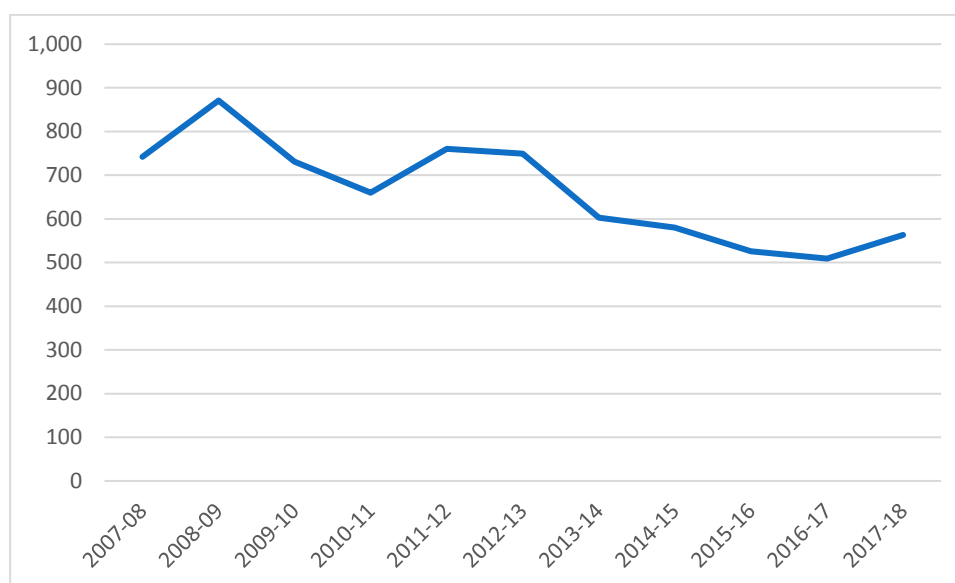
Table 9: Number of Homeless Applications Per 1,000 People during 2017/18

Area	No. of Applications per 1,000
Midlothian	6.4
Scottish Average	6.5

Source: Scottish Government HL1/Scottish Housing Network

Table 10, below, indicates the causes of homelessness in Midlothian. It shows that a third of cases have been someone being asked to leave a home, this is often a young person who can no longer stay at home. A similar proportion of cases were due to a dispute within the home the applicant had previously stayed in. More than half of these disputes related to domestic violence.

Table 10: Reasons for Homelessness, 2012 – 2017

Reasons For Homelessness	Percentage
Asked to leave	33%
Dispute within household: violent or abusive	22%
Dispute within household / relationship breakdown: non-violent	15%
Other action by landlord resulting in the termination of the tenancy	9%
Other reason for leaving accommodation / household	6%
Other reason for loss of accommodation	3%
Termination of tenancy / mortgage due to rent arrears / default on payments	3%
Discharge from prison / hospital / care / other institution	2%
Forced division and sale of matrimonial home	2%
Overcrowding	2%
Loss of service / tied accommodation	1%
Harassment	1%
Fleeing non-domestic violence	1%
Applicant terminated secure accommodation	1%
Emergency (fire, flood, storm, closing order from Environmental Health etc.)	0%
All	**100%**

Chart 2 shows the age breakdown of homeless applicants presenting to the Council between 2015/16 and 2017/18. It shows that there is a low proportion of homeless applications from people over the age of 60 (61 applicants) and those aged between 26 and 59 formed the largest age group of applicants (1,039). However, a significant proportion of applicants (586) were younger people aged between 16 and 25. With younger people the most common reason for being homeless was being asked to leave the family home.

Chart 2: Homeless Applications, by age group, 2015/16 - 2017/18
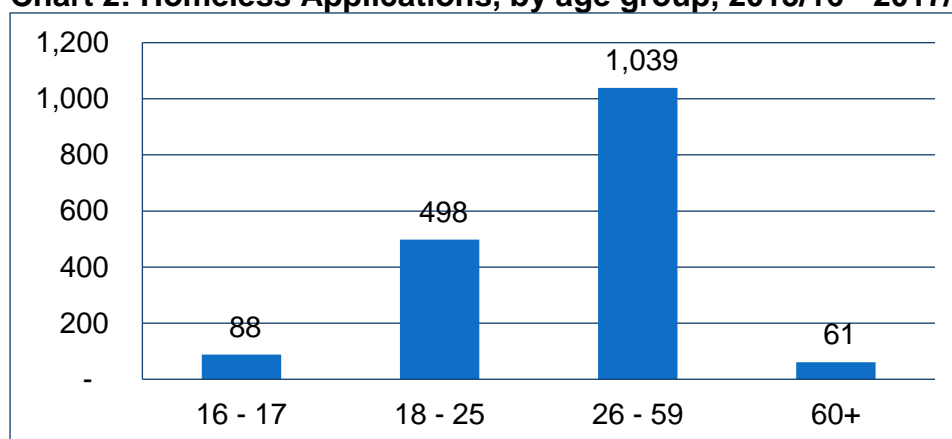

Chart 3, below shows the proportion of homeless applicants who slept rough the night before they presented to their local authority during 2017/18. In Midlothian, 0% of applicants reported slepping rough the night before making a homeless application which indicates that the incidence of rough sleeping is a rare occurrence in this area. Rough sleeping is more common in some other areas – in particular

Glasgow, where 9% (equivalent to 460 households) stated they had slept rough the night before they presented as homeless.

Chart 3: Percentage of applicants who slept rough the night before applying 2017/18
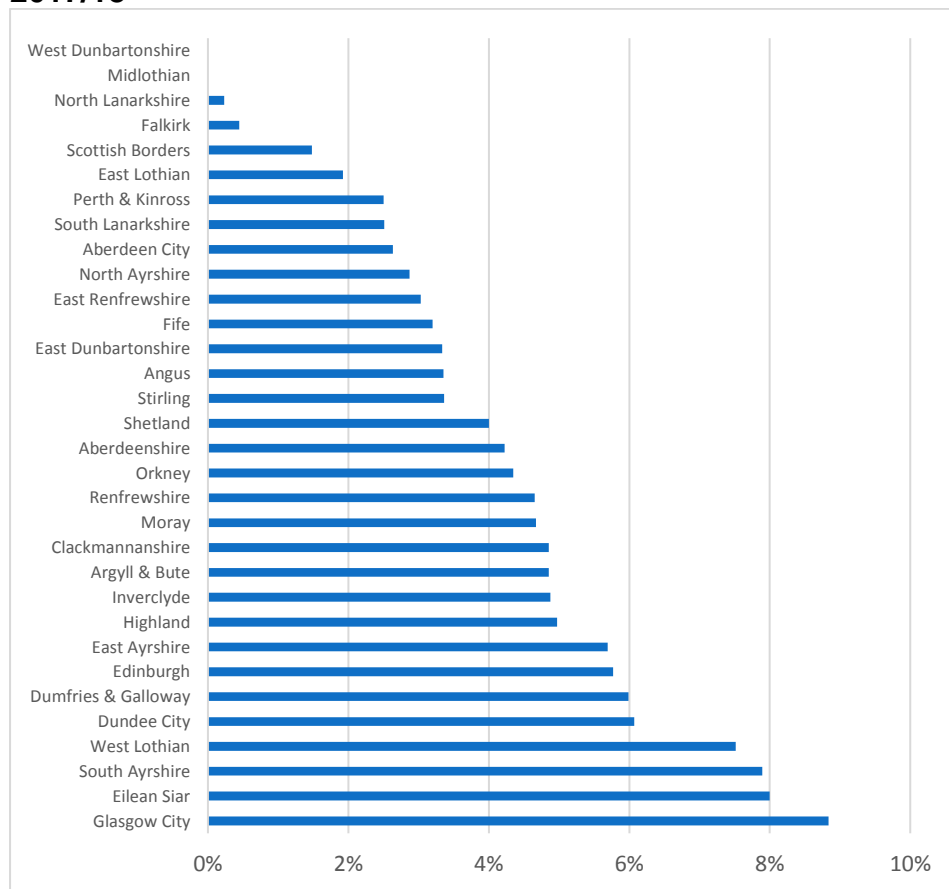

Chart 4, below, shows the average time taken for Councils in Scotland to close a homeless case. Closing a homeless case usually occurs when a homeless applicant has secured permanent accommodation – usually social rented housing and occasionally private rented housing. Data for other Councils has been anonomised. The Chart shows that Midlothian Council reported the longest average number of weeks to close a homeless case in Scotland, with an average time of 105 weeks to close a case. The average time across Scotland was 34 weeks. The shortest average time to close a homeless case in Scotland was 17 weeks. The main reason for this length of time is a lack of supply of social rented lets to accommodate homeless households.

Chart 4: Average number of weeks to close homeless case, by Council 2017/18
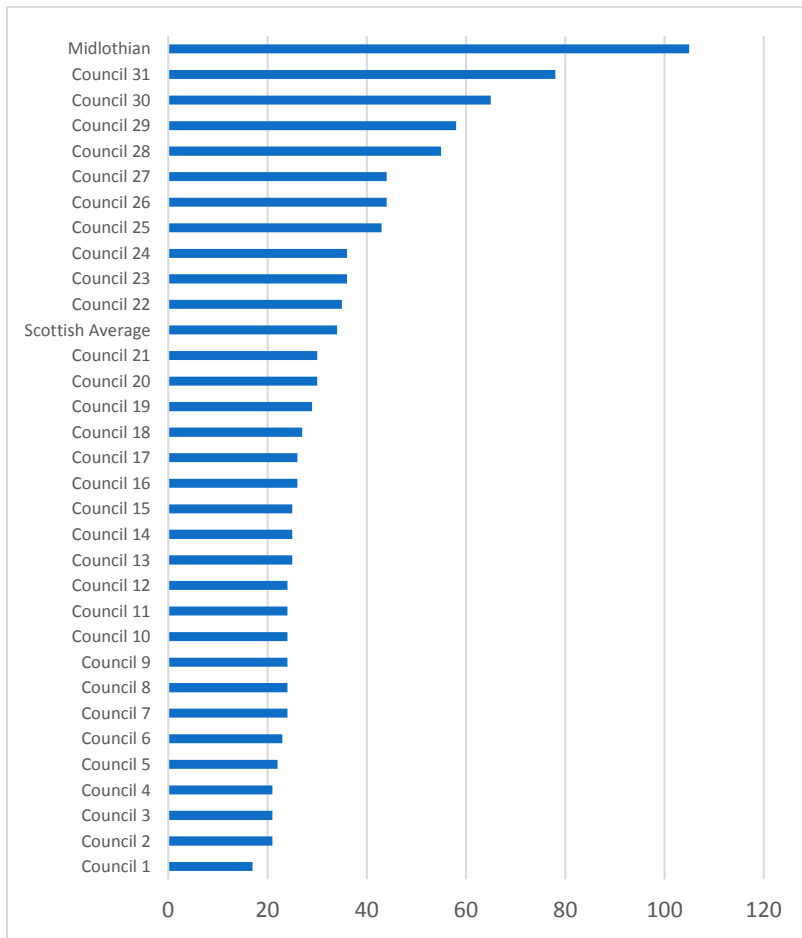
5. The supply of temporary accommodation in Midlothian

Chart 5 below shows the number of households living in temporary accommodation in Midlothian during the past 10 years. It shows a steep increase in temporary accommodation use between 2007/08 and 2010/11 when it increased from 310 to 555 households before a slight reduction occurred – the levelling off of demand can be partly attributed to an increased focus on homeless prevention. It has slightly reduced between 2015/16 and 2017/18. This recent reduction was due to Midlothian Council no longer operating a Private Sector Leasing Scheme as this was no longer an affordable source of temporary accommodation for the Council.

Chart 5: Number of Households living in temporary accommodation in Midlothian, 2007/08 – 2017/18[4]
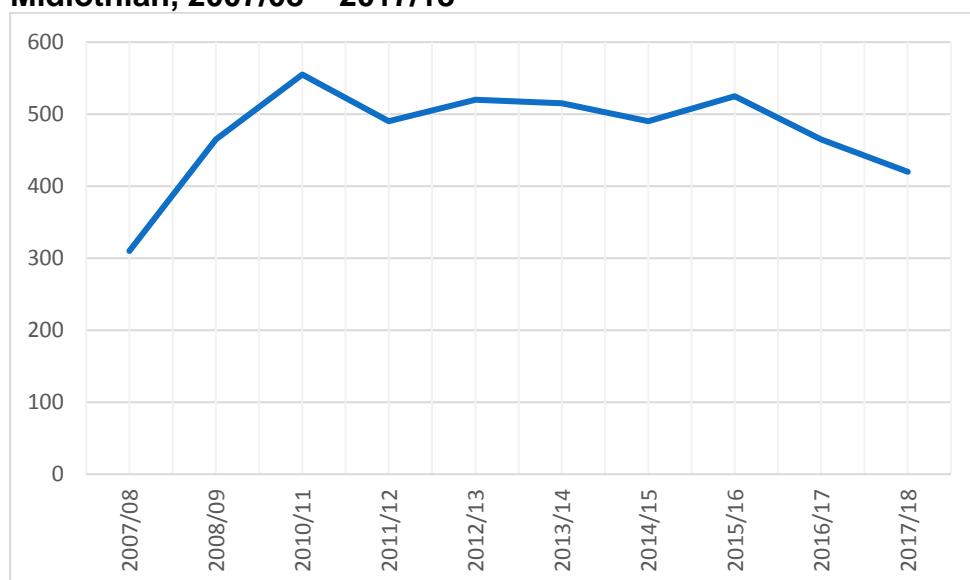
Chart 6 shows the average number of homeless households Midlothian Council has living in bed and breakfast accommodation. It shows that there has been a significant reduction from 90 households in 2011/12 to 48 households in 2017/18. This reduction has been due to the Council increasing the use of Houses in Multiple Occupation. The Council has aquired three buildings (two which were empty Council –owned buildings) and renovated the building before letting the units out as temporary accommodation with on site staff support.

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[4] The figures are taken as a snapshot of temporary accommodation use on 31st March of each year.

Chart 6: Number of homeless households in bed and breakfast use for temporary accommodation in Midlothian 2011/12 – 2017/18
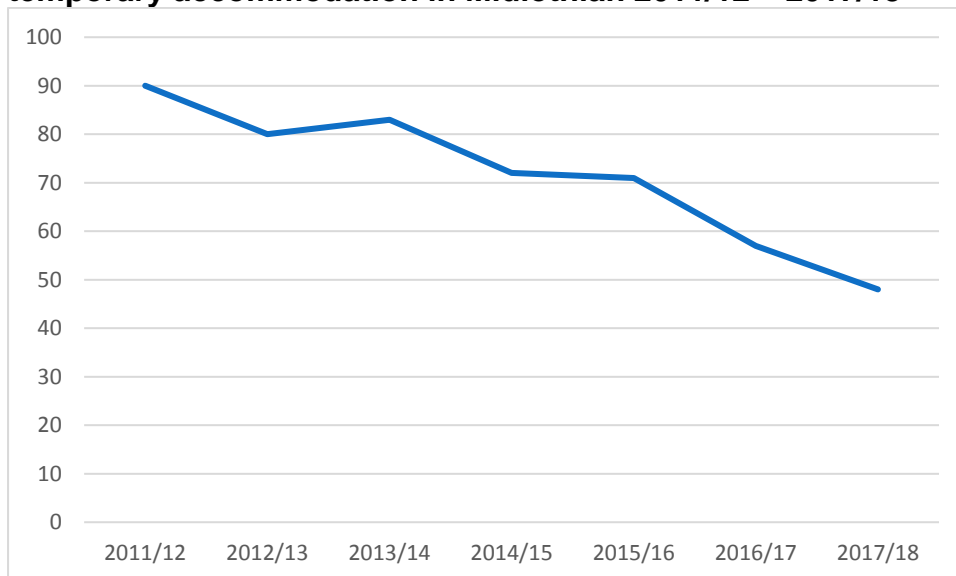
Satisfaction with the quality of temporary accommodation provided by Midlothian Council is lower than average. The satisfaction level for 2017/18 was 71.5%, which was lower than the Scottish average of 88%. Anecdotal information suggests that a significant proportion of dissatisifed service users stated dissatisfaction not because the accommodation was of poor quality but because of the length time spent in the temporary accommodation.

6. Housing support needs of homeless households

A significant number of homeless households receive housing support to maintain their temporary or permanent accommodation. This helps households, particularly those with more complex needs, to sustain their tenancy and ensure they are meeting their obligations as a tenant, including being a good neighbour and avoiding rent arrears. Support workers will work with homeless people and those at risk of homelessness in their own home. Some homeless clients live in supported accommodation where staff are based within the accommodation to provide support and supervision. The types of skills and support provided by support workers include:

- Maintain and sustain stable accommodation.
- Deliver to support people to develop their skills in activities of daily living.
- To work in a co-ordinated multi-agency way with other services.
- To improve the quality of life of tenants.
- To support tenants in undertaking meaningful activities including accessing education and training.
- Maximise the number of people in employment and gaining skills to prepare them for employment.
- To improve tenants health, safety and wellbeing.

Around 300 homeless households receive housing support services in Midothian, 94 households live in accommodation which provides support. Table 11, below, shows the estimated support needs for all homeless households as at November 2018. It shows that the majority of households (66%) had no or low support needs. A total of 16% of households have medium support needs requiring housing support. In terms of cases with complex needs, there are currently 114 cases which require intensnive support in order to sustain their tenancy. These individuals may have health needs and may lead chaotic lifestyles including substance misuse. A further 78 households have been estimated as being unsuited to indepenent living and requiring supported accommodation to ensure they can sustain their tenancy.

Table 11: Support needs of homeless households in Midlothian (November 2018)

Support Needs	Estimated % of current homeless cases	Estimated number
No/low support needs - proportion of current homeless cases with no/low support requirements who will easily move into mainstream, settled housing with no need for specific support other than sign-posting/low level housing management support	66%	709
Medium support needs - proportion of current homeless cases with medium support needs, whether visiting housing support, or multi-professional wrap-around support to enable people to live independently in mainstream housing.	16%	178
Complex needs - proportion of current homeless cases with severe and multiple disadvantage or complex needs who would benefit from intensive wrap-around support and a Housing First approach to re-housing	11%	114
Residential/Supported Accommodation - proportion of current homeless cases where independent living is not appropriate due to safety, risk to self or others, choice and for whom shared and supported accommodation is the preferred housing option.	7%	78
Total	**100%**	**1,079**

7. Midlothian's Rapid Rehousing Transition Plan

In order that Midlothian's Rapid Rehousing Transition Plan is a success there are key challenges to be addressed in Midlothian during the five year period:

- The turnover of in social rented housing is low in Midlothian compared to other areas. In order to meet the need for homeless accommodation a total of 457 lets would need to be available for homeless households. In 2017/18, 258 lets were made available for homeless households.
- The supply of new affordable housing in recent years has not been sufficient enough to meet the need.
- There are over 1,000 open homeless cases.
- 370 (33%) homeless households require housing support in order that they can live independently and sustain their own tenancy. 192 households have severe and multiple disadvantage and will need intensive support in order that they can be permanently housed and supported in their tenancy on an ongoing basis.
- The availability of housing in the private rented sector may be declining and only supports a small proportion of households to alleviate homelessness.
- Despite an ongoing new build programme and an increase in the proportion of allocations to homeless households, the length of time taken homeless households wait for permanent housing is the longest in Scotland. The length of time will not decrease for several years due to the backlog in homeless applications.
- There are over 3,500 households on the Council's Housing List who are not homeless but many of these households also have important housing needs which should also be addressed.
- Despite significant investment in new council-owned emergency accommodation Midlothian Council still use bed and breakfast accommodation for homeless households which is not good practice and it is expensive to provide.

Midlothian's vision for the Rapid Rehousing Transition Plan is that by 2024:

"An increased number of homeless households will obtain permanent accommodation, no homeless household will be accommodated in bed and breakfast accommodation, and the average time taken for the Council to complete its homeless duty will have halved from 105 weeks to 52 weeks."

In order to transform the approach to finding accommodation for homeless households the following four key outcomes have been identified:

Outcome 1: The supply of permanent accommodation for homeless households has increased

Outcome 2: Bed and breakfast accommodation is no longer used as emergency accommodation for homeless households and the time households spend in temporary accommodation has reduced

Outcome 3: Homeless households with support needs are supported to access and maintain permanent accommodation

Outcome 4: Housing options and support is in place to prevent homelessness

Each outcome has a set of actions which the Council and key stakeholders will need to work in partnership to achieve. More detail on the proposed actions are set out in the action plan on page 25.

It is likely that some actions will be added or changed during the next five years in order to ensure that the Rapid Rehousing Transition Plan remains a relevant strategic document during this period. Some of the identified actions are not achievable unless additional resources can be identified. Council Officers will discuss actions which have an additional resource requirement with the Scottish Government in order that consideration can be given to the provision of additional resources. If there are no additional resources allocated to Midlothian to support the development of this Plan it is likely that the vision for a rapid rehousing will not be realised within the five year period, although significant progress can still be made.

Outcome 1: The supply of permanent accommodation for homeless households has increased

Achieving a significant increase in the supply of permanent accommodation is key to providing homeless households with a settled, mainstream housing outcome as soon as possible. The low supply of affordable housing in Midlothian is the biggest contributor to issues such as the length of time taken to close homeless cases and need to use of bed and breakfast accommodation. Table 12, below, shows that there has been considerable investment in new housing in recent years and Midlothian Council has become one of the largest council housing developers in Scotland, however, this development has not been able to address the increasing level of housing need.

Table 12: New Affordable Housing in Midlothian since 2006

Settlement	Council Completed Units	RSL Completed Social Units	RSL Completed MMR Units	Shared Equity	Settlement sub-total	Low Cost Home Ownership	Help to Buy	TOTAL
Bilston	0	28	0	0	**28**			
Bonnyrigg/Lasswade	230	36	6	4	**276**			
Dalkeith	149	129	54	17	**349**			
Danderhall	1	0	0	0	**1**			
Gorebridge	242	38	24	4	**308**			
Loanhead	92	0	0	0	**92**			
Mayfield/Easthouses	130	137	12	0	**279**			
Newtongrange/Butlerfield	57	26	15	0	**98**			
Penicuik	181	42	0	0	**223**			
Rosewell	0	32	16	0	**48**			
Roslin	1	0	0	0	**1**			
TOTAL	**1083**	**468**	**127**	**25**	**1703**	**689**	**710**	**3102**

Recent analysis of housing need across Scotland estimated that in order to provide enough accommodation to meet demand and the current backlog a 217% increase in the number of lets would be required in future years.[5]

Therefore despite the significant level of investment the existing housing supply is insufficient to meet the current backlog and newly arising need within five years even with an increased focus on prevention and an increased proportion of lets to homeless households in the social rented and private rented sector.
To address this lack of supply Midlothian Council has submitted a Strategic Housing Investment Programme which shows that the Council, in partnership with RSLs, has the capacity develop 2,209 affordable homes to increase the supply of new housing. However, a significant increase in the level of grant funding is required to achieve this.

In addition, social rented landlords in Midlothian will be required to review their Housing Allocation Policies to ensure that an increased number of homeless households can be accommodated in social rented housing. There are also opportunities to maximise the number of homeless households being provided with housing in the private rented sector and also potential to look at shared

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[5] Scotland's Transition to Rapid Rehousing, Indigo House (June 2018)

accommodation options for some households which would make better use of existing housing.

In undertaking these actions it is projected that the number of homeless households being accommodated in social rented housing and private rented housing will increase from 268 in 2017/18 to 370 in 2023/24 which will significantly improve the flow of households moving from temporary accommodation into permanent accommodation.

Outcome 2: Bed and breakfast accommodation is no longer used as emergency accommodation for homeless households and the time households spend in temporary accommodation has reduced

As noted earlier in this Plan, Midlothian Council's use of bed and breakfast accommodation has been reducing. This aligns with recent research reports which point to the use of bed and breakfast as being unsuitable for homeless households. In addition the Scottish Government's *Ending Homelessness Together: High Level Action Plan[6]* notes that it intends to introduce legislation that will restrict the time that a homeless household spends in bed and breakfast to 7 days. Midlothian Council intends to discontinue using bed and breakfast for temporary accommodation by 2020/21. To do so it will need to increase the level of other types of accommodation in order to meet the demand for temporary accommodation.

Table 13 shows a projection of the types of affordable housing being used in March 2019 and compared this with a projection for March 2024. Overall, it projects a slight reduction (3%) in the provision of temporary accommodation although this is dependent on the success of being able to rapidly rehouse homeless households. If the pace of which households are accommodated increases, the flow of households moving from temporary accommodation will increase and less temporary accommodation units will be required. It shows that there will be a 100% reduction in bed and breakfast use. The only other type of accommodation with a reduction is Council-owned furnished accommodation. This type of accommodation will only reduce if a proportion of temporary accommodation occupants are allowed to convert their tenancy into a permanent tenancy. It is projected that there will be increases in supported accommodation and also leased accommodation in the private rented sector.

Table 13: Temporary accommodation provision by type, March 2019 and March 2024

Type of Accommodation	March 2019	March 2024	Change	%
Council Furnished Accommodation	235	215	-20	-9%
Council Shared Supported Accommodation	94	116	22	23%
RSL Furnished Accommodation	35	35	0	0%
RSL Shared Supported Accommodation	9	9	0	0%
Leased Accommodation Private Rented Sector	48	80	32	67%
Bed and Breakfast Accommodation	48	0	-48	-100%
Total	**469**	**455**	**-14**	**-3%**

Midlothian Council have set a budget of £6 million to provide more mainstream furnished accommodation to meet demand and also to increase provision of other types of temporary accommodation in order to reduce the need for bed and breakfast accommodation. Currently the Scottish Government provide funding for new affordable housing but there is no funding available for new temporary accommodation. This restricts the ability for Councils to provide good quality temporary accommodation at an affordable rent as the cost of providing the property is not subsidised. Several actions in relation to this outcome require grant funding for additional temporary accommodation in order that suitable good quality

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[6] https://www.gov.scot/publications/ending-homelessness-together-high-level-action-plan/

accommodation provision is made available. In doing so tenant satisfaction with temporary accommodation in Midlothian would increase.

Currently, 189 homeless households have been living in temporary accommodation for longer than two years. In order to reduce this number to zero by 2023/24 access to permanent accommodation for homeless households will have had to significantly increase.

Outcome 3: Homeless households with support needs are supported to access and maintain permanent accommodation

As stated earlier in this document, the number of people sleeping rough in Midlothian is low and it is important that rough sleeping does not increase in Midlothian. However, there a significant proportion of homeless households with supports needs and it is important that they are provided with this support.

In recognition of this, in Midlothian the Health and Homelessness Steering Group was developed in 2016. It has been responsible for:

- Undertaking a Report in which homeless clients in Midlothian have shared their experiences of homelessness and access to health services.
- Developing an action plan to improve health services to homeless people in Midlothian
- Maximising opportunities to prevent homelessness – such as developing the hospital discharge project to get hospital staff at the Infirmary to contact the housing services team to plan the departure of people from their services.
- Reviewing and improving service provision to ensure meets the needs of homeless clients – for example the CHIT nurse (Community Health Inequalities Team) visits supported temporary accommodation units to meet with clients.

In terms of supporting young people, Midlothian Council is the first Council in Scotland to implement the SQA accredited course "Tenancy and Citizenship Group Award". This provides young people with modules around tenancy sustainment and citizenship to enable them to manage their own accommodation. Modules include practical tasks like cooking and budgeting. The course will be run in Midlothian Council's supported Accommodation units in order to facilitate rapid move on from shared accommodation. It is expected that the course will be rolled out to all young people in shared accommodation, but it is noted that social work colleagues have expressed an interest of having the course in their residential accommodation projects as well to prepare care leavers for leaving residential placements.

The Scottish Government's HARSAG recommendations have recognised Housing First as a model which could better support households with high support needs if they become homeless or are at risk of homelessness.

The Housing First model, first developed in New York, is a successful method of helping people who are homeless and who have multiple and enduring support needs, to secure accommodation and be supported to live a sustainable way of life. Housing First uses housing as a starting point rather than an end goal – this is different from current practice which would normally require a homeless applicant to live in supported accommodation until they are considered to be able to sustain their own tenancy. Instead, Housing First clients are provided with a permanent tenancy quickly and provided with a high level of support in order that they can receive support to maintain their tenancy and have other support needs, such as health needs, addressed. Housing First is particularly applicable to those that sleep rough and are likely to present as homeless repeatedly. Whilst there is a low incidence of rough sleepers in Midlothian there are some homeless clients with multiple support needs who could benefit from support through Housing First. This is estimated to be around 10 households per year.

The seven key principles of Housing First

- **People have a right to a home** so Housing First prioritises access to housing as quickly as possible without any conditions other than the willingness to maintain a tenancy. Individuals won't lose the tenancy if they disengage from or no longer require support.
- **Flexible support is provided for as long as it is needed** with housing providers committing to long-term, flexible support without a fixed end date.
- **The housing and support are separate** – so housing is not conditional on engaging with the support. The offer of support remains if the tenancy fails.
- **Individuals have choice and control.** They have the choice, where possible, about where they live. Accommodation should be pepper-potted and self-contained, unless an individual says they would prefer shared housing.
- **Active engagement**. Staff proactively engage clients and caseloads are small. Support provided as long as clients need it.
- **The service supports people to identify their strengths and goals** and to develop skills and knowledge to achieve them.
- **A harm reduction approach is used** – so individuals who, for example, self-harm are supported to undertake practices which minimise the risk of them self-harming.[7]

Evaluations of Housing First has shown that around 80% of households are able to sustain their accommodation. If households with complex support needs go through the traditional route to rehousing they are much less likely to obtain permanent accommodation and may end up leaving temporary accommodation and finding it difficult to obtain housing options. Most households who were provided with accommodation via Housing First reported significantly improved mental health and those who reported use of alcohol and or drug use also noted a reduction in use. The ongoing housing support is also there to support households to integrate into their community, by for example, being a good neighbour or participation in community events.

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[7] www.housingfirstguide.eu

Outcome 4: Housing options and support is in place to prevent homelessness

The Scottish Government's Housing Options Guidance (2016) notes that Housing Options are "a process which starts with housing advice when someone approaches a local authority with a housing problem. This means looking at an individual's options and choices in the widest sense. This approach features early intervention and explores all possible tenure options, including council housing, RSL's and the private rented sector.

The advice can also cover personal circumstances which may not necessarily be housing related, such as debt advice, mediation and mental health issues. Rather than only accepting a homelessness application, local authority homelessness services will work together with other services such as employability, mental health, money advice and family mediation services, etc., to assist the individual with issues from an early stage in the hope of avoiding a housing crisis.

In Midlothian it is particularly important that opportunities for homeless prevention and housing options activities are maximised due to the low housing supply of social rented housing.

The trend of a reducing number of applications is attributable to the recent focus being made in terms of homeless prevention work and housing options activity. However, more prevention work is required if the Council are to reduce the number of open homeless cases in Midlothian and the annual number of households who present to the Council as homeless.

Homeless prevention work can cover a range of activities, some will be reacting to people approaching the housing service looking for housing options advice and some are longer term, such as educating young people in schools in terms of their future housing options when they leave the family home. With around a third of young people aged between 16 and 25 applying as homeless there is an opportunity to engage with this group and their families in order to support better housing solutions which could avoid the young person becoming homeless. In addition, Care Leavers or Looked After Children have a single point of contact identified in the Housing Services Team, who provides housing options advice in accordance with the national guidance.

The Rapid Rehousing Transition Plan also identifies that greater use of the private rented sector to provide housing options for households needs to be further encouraged. This includes introducing a rent deposit scheme in Midlothian which could help low income households access a private let more easily.

It is also proposed that some households threatened with homelessness could benefit from independent advocacy support in order that they can better engage with services that could prevent homelessness from occurring.

In addition, housing services staff from Midlothian Council are active participants with the Housing Options Hub in the South East Scotland which enables joint working between Council's on issues which can support homeless prevention activity – this includes better ways of advertising private lets, a housing options website specifically

designed for this region and better protocols for households leaving prison or young offenders institutions.

8. Action Plan

Outcome 1: The supply of permanent accommodation for homeless households has increased					
Action	**Responsible**	**Timescale**	**Current Indicator 2017/18**	**Target Indicator 2023/24**	**Resource Requirement**
Increase the supply of new build affordable housing in Midlothian	Midlothian Council, RSLs	By 2019/20	258 Lets to Homeless by Council and RSLs	350 Lets to Homeless by Council and RSLs	Yes – see page 31
Review Midlothian Council's Housing Allocation Policy to ensure homeless households are housed more quickly.	Midlothian Council, RSLs	By 2020/21	258 Lets to Homeless by Council and RSLs	350 Lets to Homeless by Council and RSLs	
Review nomination agreements with RSLs to ensure homeless households are housed more quickly.	Midlothian Council, RSLs	By 2020/21	258 Lets to Homeless by Council and RSLs	350 Lets to Homeless by Council and RSLs	
Provide settled accommodation to homeless households in the private rented sector	Midlothian Council, Private Landlords	By 2020/21	10 Lets to Homeless	20 Lets to Homeless	
Reduce the average number of weeks to close a homeless application	Midlothian Council, RSLs	By 2023/24	Average of 105 weeks taken to close homeless case.	Average of 52 weeks taken to close homeless case	
Investigate the use of choice based letting for improving access to housing for homeless households	Midlothian Council, RSLs	By 2020/21	258 Lets to Homeless by Council and RSLs	350 Lets to Homeless by Council and RSLs	
Promote the use of shared accommodation as a permanent housing option for homeless households			0 households living in shared accommodation owned by Midlothian Council/RSL/Private Rented Sector	16 households living in shared accommodation owned by Midlothian Council/RSL/Private Rented Sector	Yes – see page 31
Target open market purchases for council housing to areas and house types in high demand from homeless applicants	Midlothian Council	By 2019/20	20 properties purchased since 2017	80 properties purchased	Yes see page 31, part of SHIP Development Funding

Outcome 2: Bed and breakfast accommodation is no longer used as emergency accommodation for homeless households and the time households spend in temporary accommodation has reduced					
Action	**Responsible**	**Timescale**	**Current Indicator 2017/18**	**Target Indicator 2023/24**	**Resource Requirement**
End the use of bed and breakfast accommodation for temporary accommodation	Midlothian Council, RSLs	By 2020/21	Average of 48 households per night.	0	
No homeless household will spend longer than 2 years in temporary accommodation	Midlothian Council, RSLs	By 2023/24	189 households in temporary accommodation for longer than 2 years	0 households in temporary accommodation for longer than 2 years	
Acquire 35 additional homes to let as mainstream furnished homes for use as temporary accommodation	Midlothian Council, RSLs	By 2019/20	1 additional unit acquired	35 additional units acquired	Yes – page 32
Provide 30 units via the private rented sector in partnership with Cyrenians and the National Homelessness Property Fund	Midlothian Council, East Lothian Council, Cyrenians and the National Homelessness Property Fund	By 2019/20	0 Units	30 Units	Yes – page 32
Convert a small proportion of furnished mainstream lets into permanent accommodation to increase the speed of rehousing homeless households	Midlothian Council, RSLs	By 2019/20	None	15 per annum	
Lease or make use of existing council housing to provide 16 short term emergency accommodation units designated for larger homeless households, such as applicants with children.	Midlothian Council, RSLs	By 2020/21	None	16 units	Yes – page 33
Convert Jarnac Court – an existing office buiding owned by Midlothian Council - into 22 short term emergency accommodation units.	Midlothian Council	By 2019/20	0 units	22 units	Yes – page 33

Outcome 2: Bed and breakfast accommodation is no longer used as emergency accommodation for homeless households and the time households spend in temporary accommodation has reduced

Action	Responsible	Timescale	Current Indicator 2017/18	Target Indicator 2023/24	Resource Requirement
Work with the Scottish Government and Scottish Councils to review the rent model for temporary accommodation	Midlothian Council, CoSLA, Scottish Government	By 2020/21	Not started	Model developed to provide more affordable temporary accommodation	
Improve tenant satisfaction with the quality of temporary accommodation	Midlothian Council, RSLs	By 2022/23	71.5% of homeless clients stated they were satisfied with quality.	85%	

Outcome 3: Homeless households with support needs are supported to access and maintain permanent accommodation					
Action	**Responsible**	**Timescale**	**Current Indicator 2017/18**	**Target Indicator 2023/24**	**Resource Requirement**
Ensure accommodation and support is provided to people to ensure no sleeping rough occurs in Midlothian.	Midlothian Council	By 2019/20	% of homeless applicants who slept rough the night before applying: 0%	% of homeless applicants who slept rough the night before applying: Maintain at 0%	
Roll out the use of housing first tenancies for the most vulnerable homeless households in Midlothian.	Midlothian Council, NHS Lothian	By 2019/20	1 pilot underway	10 housing first tenancies supported per annum	Yes – page 34
Recruit volunteer housing first peer group mentors to support housing first tenants	Midlothian Council, NHS Lothian	By 2020/21	No peer mentor support	2 peer mentors supporting housing first tenants	
Continue to support improved health and wellbeing outcomes for homeless households by implementing the Health and Homeless Action Plan	Midlothian Council, NHS Lothian	By 201920	No data	Consider a measure for evaluating health and homeless outcomes for homeless households.	
Work with Women's Aid to identify additional accommodation with support in Midlothian	Midlothian Council, RSLs, Women's Aid	By 2020/21	11 Units	Increase	Yes – page 31, related to the development funding for the SHIP
Support young homeless people to obtain a qualification to support their tenancy sustainment skills.	Midlothian Council	By 2019/20	Pilot Underway	50% of young people in supported accommodation obtain SQA Award	Yes – page 34
Implement SHORE Standards	Midlothian Council, RSLs, Scottish Prisons Service	By 2019/20	Ongoing	SHORE Checklist Complete	

Outcome 4: Housing options and support is in place to prevent homelessness					
Action	**Responsible**	**Timescale**	**Current Indicator 2017/18**	**Target Indicator 2023/24**	**Resource Requirement**
Reduce the overall number of open homeless cases by 20%	Midlothian Council	By 2023/24	1,079	860	
Recruit a Youth Homelessness Mediation Officer	Midlothian Council	By 2019/20	187 homeless applications made by young people aged 16 - 25	10% reduction in homeless applications from young people	Yes – page 34
Recruit a dedicated homeless prevention officer to develop further housing options and support initiatives.	Midlothian Council	By 2019/20	563 homeless applications in 2017/18	Reduce homeless applications by 10%	
Make better use of the private rented sector by introducing a Rent Deposit Scheme.	Midlothian Council	By 2019/20	No of households supported to obtain a private let. No data.	30 households per annum supported to obtain a private let.	Yes – page 35
Give households who are homeless, or at risk of homelessness, a stronger voice through Independent Advocacy Support.	CAPS Independent Advocacy	By 2019/20	Estimated that >5 homeless households received support through CAPS Independent Advocacy	On average 60 vulnerable households supported through CAPS Independent Advocacy	Yes – page 35
Continue to provide housing education courses in Midlothian Secondary Schools	Midlothian Council	By 2019/20	All secondary schools have housing education on curriculum	All secondary schools have housing education on curriculum	
Continue to work with Edinburgh, Lothians and Borders Housing Options Hub to ensure joint working on homeless prevention activities across the region.	Midlothian Council, East Lothian Council, West Lothian Council, City of Edinburgh Council, Scottish Borders Council, Falkirk Council	By 2019/20	£1.4m of funding provided by Scottish Government to support Housing Options Hubs in Scotland between 2010 and 2018	Increased annual amount of funding provided by the Scottish Government	

9. Resource Plan

It is intended that the transition to rapid rehousing can go some way to being achieved within existing resources, and/or by savings created through service redesign or refocus. However, a significant acceleration in transformation to rapid rehousing will require additional resources in excess of what can be resourced by Midlothian Council. All actions which require additional resources are detailed below.

Outcome 1						
Action: Increase the supply of new build affordable housing in Midlothian						

Midlothian Council recently submitted the Strategic Housing Investment Plan for 2019/20 – 2023/24. It noted that in 2018/19 the allocation of grant funding was £8.1m was a record level of grant funding. However, in order to achieve the ambitious target of 2,209 affordable homes, Scottish Government grant funding of £111.7m will be required.

Of the homes, 1,207 are for council housing and 597 are for RSL social rented housing. If funding is restricted then social rented units should be prioritised for investment. Increased grant funding for affordable housing is essential as it is the most effective way of substantially increasing the supply of affordable housing. If a consistently higher annual supply of affordable housing can be achieved during the five year period this will reduce the length of time homeless households spend in temporary accommodation and would potentially reduce the number of temporary accommodation units that are required.

Required Resources	2019/20	2020/21	2021/22	2022/23	2023/24	Total
	£m	**£m**	**£m**	**£m**	**£m**	**£m**
Available	42.20	42.20	42.20	42.20	42.20	211.00
Additional Funding Required	16.10	52.60	29.40	8.60	5.00	111.70
Total	58.30	94.80	71.60	50.80	47.20	322.70

Outcome 1						
Action: Promote the use of shared accommodation as a permanent housing option for homeless households.						

A 0.5 Grade 6 post is being proposed to take forward a shared accommodation project in Midlothian. There is the potential for shared tenancies in council housing, RSL housing and the private rented sector which would make the best use of existing housing in Midlothian and would enable homeless households to access temporary accommodation or permanent accommodation in a shared tenancy.

The posholder would identify suitable properties and also work with the homeless team and housing support workers to promote the option of shared tenancies to homeless applicants and identify suitable matches for sharing.

Required Resources	2019/20	2020/21	2021/22	2022/23	2023/24	Total
	£m	**£m**	**£m**	**£m**	**£m**	**£m**
Available						
Additional Funding Required	0.018m	0.018m	0.019m	0.019m	0.020m	0.94m
Total	0.018m	0.018m	0.019m	0.019m	0.020m	0.94m

Outcome 2
Action: Acquire 35 additional homes to let as mainstream furnished homes for use as temporary accommodation

Aquiring additional temporary accommodation is important in facilitating the transition of rapid rehousing for several reasons:
- It is acknowledged that for most homeless households the most appropriate type of temporary accommodation is mainstream housing located within communities. In order to reduce bed and breakfast use, further mainstream temporary accommodation is required in order to accommodate households who would normally spend an initial period in bed and breakfast.
- It is possible to offer some households the opportunity to transfer their current temporary accommodation into permanent accommodation. For this to be taken forward without reducing the required level provision of temporary accommodation, additional units are required.

Options for developing this additional accommodation are being considered. Some will be homes purchased on the open market. The potential for some new build units or another accommodation model similar to the social bite village will be investigated during 2019. This already occurs for increasing the supply of council housing, with a target of at least 80 homes purchased from the open market being undertaken between 2017 and 2022. Open market purchases receive grant funding of £40,000 per unit. It is proposed that the Scottish Government also grant fund each temporary accommodation unit with £40,000 of funding per unit. This ensures that the quality of accommodation is high and that properties are exempted from second homes taxation rules. It is possible that funding support in loan funding or grant funding which would be recycled in the event of the sale of a property.

Required Resources	2019/20	2020/21	2021/22	2022/23	2023/24	Total
	£m	£m	£m	£m	£m	£m
Available	1.750m	1.750m	-	-	-	3.500m
Additional Funding Required	0.700m	0.700m	-	-	-	1.400m
Total	2.450m	2.450m	-	-	-	4.900m

Outcome 2
Action: Provide 30 units via the private rented sector in partnership with Cyrenians and the National Homelessness Property Fund

A model has been developed in partnership with Cyrenians and the National Homelessness Property Fund which will provide 65 units in East Lothian and Midlothian. The model involves an investment being made by Midlothian and East Lothian Council, the Scottish Government and the National Homelessness Property Fund in order to purchase units which will be let out at Local Housing Allowance rate.

It is proposed that 30 properties would be purchased on the open market in Midlothian and these properties would be let to households at risk of homelessness or currently living in temporary accommodation. Tenancy support would be provided by Cyrenians. This model is a method for making better use of the private rented sector for supporting homeless households and those at risk of homelessness. The outcomes would be a widening of housing options in Midlothian and another means for reducing the use of bed and breakfast accommodation in Midlothian. It also provides a more affordable form of accommodation compared to council-owned temporary accommodation. The Scottish Government could potentially provide funding for this scheme as a long term loan or alternatively as grant funding similar to the approach to providing grant funding for affordable housing.

Required Resources	2019/20	2020/21	2021/22	2022/23	2023/24	Total
	£m	£m	£m	£m	£m	£m
Available	3.205m	-	-	-	-	3.333m
Additional Funding Required	1.666m	-	-	-	-	1.538m
Total	4.871m	-	-	-	-	4.871m

Outcome 2

Action: Lease or make use of existing council housing to provide 16 short term emergency mainstream accommodation units designated for low support homeless households and homeless families with children.

In order to reduce the use of bed and breakfast accommodation it is proposed that units are either leased from an RSL or existing council housing is used to provide properties which are either clustered in a block of flats or scattered in an area. These properties will then be used for short term accommodation for low support homeless households and homeless families until longer term temporary accommodation can be sourced.

Housing stock that is flatted and that may be able to accommodate a concierge service within the building would be targeted as would accommodation where a high proportion of tenants are on the transfer list and would be willing to move. It may be possible for some tenants to transfer to new build units in the area if there is new development in an area. Costs below are required for home loss/disturbance allowance payments and works required at the voids stage including repair and decoration.

Required Resources	2019/20	2020/21	2021/22	2022/23	2023/24	Total
	£m	£m	£m	£m	£m	£m
Available						
Additional Funding Required	0.075m	0.046m				0.121m
Total	0.075m	0.046m				0.121m

Outcome 2

Action: Convert Jarnac Court – an existing office building owned by Midlothian Council - into 22 short term emergency accommodation units.

In order to continue to make reductions in the use of bed and breakfast accommodation, Midlothian Council is investing a former office building in Dalkeith in order that it can provide supported accommodation for 22 households. The total cost of alterations and refurbishments to the building is estimated to be £443,000. Spend for the works will be funded from the Housing Revenue Account.

Unlike new council housing, funding for temporary accommodation has not received grant funding. This results in temporary accommodation rents being higher than that of council housing. If grant funding was provided to temporary accommodation projects then there would be more potential to review future rent charges for temporary accommodation or spend more Housing Revenue Account resources on new build affordable housing. It is proposed that funding for 33% of the works costs could be grant funded.

Required Resources	2019/20	2020/21	2021/22	2022/23	2023/24	Total
	£m	£m	£m	£m	£m	£m
Available	0.295m	-	-	-	-	0.295m
Additional Funding Required	0.148m	-	-	-	-	0.148m
Total	0.443m	-	-	-	-	0.443m

Outcome 3

Action: Roll out the use of housing first tenancies for the most vulnerable homeless households in Midlothian.

It is proposed that 10 housing first tenancies are agreed in each year. This will require a change to Midlothian Council's Housing Allocation Policy. As Housing First tenancies are a new process only 5 tenancies are being proposed during 2019/20. Further work is required to establish overall costs required to support a homeless case provided with a permanent tenancy through the Housing First model and a draft procedure is being developed which may require refinement following an evaluation of success of initial tenancies.

Costs outlined below are based on each Housing First case receiving 15 hours support per week for up to 2 years. It is likely that higher or lower levels of support will be required for individual cases and that support will need to be flexible and able to be increased or reduced as required. Support hours are halved for Housing First clients in the 2nd year and are not continued for a 3rd year. However, it is very likely that housing support would still be required for these cases although it may be that housing support can be provided to these households through the existing arrangements if they have settled into their accommodation and are sustaining their tenancy.

Required Resources	2019/20	2020/21	2021/22	2022/23	2023/24	Total
	£m	£m	£m	£m	£m	£m
Available						
Additional Funding Required	0.066m	0.198m	0.268m	0.276m	0.284m	1.092m
Total	0.066m	0.198m	0.268m	0.276m	0.284m	1.092m

Outcome 3

Action: Support young homeless people to obtain a qualification to support their tenancy sustainment skills

Currently a team of homeless officers work to provide training for young people in supported accommodation. If a dedicated officer was recruited to this role a larger number of young people in supported accommodation would be able to achieve this qualification which would help them sustain their tenancy and provide them with important independent living skills.

Required Resources	2019/20	2020/21	2021/22	2022/23	2023/24	Total
	£m	£m	£m	£m	£m	£m
Available						
Additional Funding Required	0.035m	0.036m	0.037m	0.038m	0.039m	0.185m
Total	0.035m	0.036m	0.037m	0.038m	0.039m	0.185m

Outcome 4

Action: Recruit a Youth Homelessness Mediation Officer

A full time Grade 6 post is proposed to work with young people and their families to support households at risk of homelessness and reduce the number of young people who feel their only option is to make a homeless application. At present around a third of homeless cases in Midlothian are young people aged between 16 and 25. A Youth Homelessness Mediation Officer will work with the young person and their family, or with anyone else that has been providing a home for the young person to try to resolve disputes and explore alternative housing options to reduce the risk of becoming homeless.

Required Resources	2019/20	2020/21	2021/22	2022/23	2023/24	Total
	£m	£m	£m	£m	£m	£m
Available						
Additional Funding Required	0.035m	0.036m	0.037m	0.038m	0.039m	0.185m
Total	0.035m	0.036m	0.037m	0.038m	0.039m	0.185m

Outcome 4
Action: Make better use of the private rented sector by introducing a Rent Deposit Scheme.

Use of a Rent Deposit Scheme in Midlothian could prevent households at risk of homelessness from making an application. It could also be used to support homeless households to source an alternative to temporary accommodation.

It is estimated that a total of 30 households per annum could be supported through the Rent Deposit Scheme. The funding can be recycled in later years as some households end their tenancy. Funds would be managed by Midlothian Council's Homelessness Team. As part of the funding, a 0.5 Grade 6 post is being proposed to administer the Scheme and having a postholder in place would assist with better liaison between homeless households and tenants and also enables a dedicated Officer to work with private tenants who have been served with a Notice to Quit to help source alternative housing options.

Required Resources	2019/20	2020/21	2021/22	2022/23	2023/24	Total
	£m	£m	£m	£m	£m	£m
Available						
Additional Funding Required	0.048m	0.048m	0.034m	0.019m	0.020m	0.169m
Total	0.048m	0.048m	0.034m	0.019m	0.020m	0.169m

Outcome 4
Action: Give households who are homeless, or at risk of homelessness, a stronger voice through Independent Advocacy Support

Some households who are homeless, or at risk of homelessness find it difficult to engage with services that are there to support them in alleviating their homeless situation or maintain their current temporary or permanent tenancy. CAPS, a registered charity, has been providing independent advocacy services in the Lothian's for 25 years. The main themes of an independent advocacy service are:

- Safeguarding people who are vulnerable and discriminated against or whom services find difficult to serve.
- Empowering people who need a stronger voice by enabling them to express their own needs and make their own decisions.
- Enabling people to gain access to information, explore and understand their options, and to make their views and wishes known.
- Speaking on behalf of people who are unable to do so for themselves.

Advocacy support could help homeless households, or those at risk of homelessness in the following ways:

- Provide advocacy support to help empower people to engage with the Homeless service and Midlothian Council Housing department. The non-judgemental and independent nature of the advocacy worker means the person can trust that the advocacy worker is on their side and will enable more positive constructive conversations between the person and the Housing services.
- Meet with the person and listen to what their situation is and develop a plan of action with them to address the issues that are important to them.
- Set up appointments and go with the person to obtain specialist advice, or gather information about their rights, so the person can make informed choices to reduce their chance of becoming homeless /losing their tenancy.
- Attend with a homeless client to appointments or meetings relating to their housing situation and make sure they could fully participate and contribute, as well as remember and understand discussions and decisions, by taking notes about what the person wants to say in the meeting and what is agreed.
- Provide advocacy support to help someone sustain their tenancy by assisting them with financial issues such as rent arrears, welfare benefit claims, e.g. set up a bank account; get advice from CAB, Welfare Rights, Job Centre, DWP; gather evidence for a Welfare Benefit claim/housing benefit claim; attend benefit assessments with them to make sure their financial situation is properly considered.

- Liaise with other services, in relation to a person's housing situation, on behalf of the person if they ask us to do so.
- Act as a safety net for people who fall through the gaps in the housing system, such as people who abandon their temporary accommodation or want to complain about their experience of the system but do not have the emotional resilience or knowledge and confidence to do so.

In order to provide an Independent Advocacy Service specifically for homeless service clients additional funding is required to employ a post to carry out Advocacy Support for up to 60 households per annum.

Required Resources	2019/20	2020/21	2021/22	2022/23	2023/24	Total
	£m	£m	£m	£m	£m	£m
Available						
Additional Funding Required	0.022m	0.021m	0.023m	0.023m	0.023m	0.112m
Total	0.022m	0.021m	0.023m	0.023m	0.023m	0.112m

10. Monitoring, Equalities and Consultation

Midlothian Council provides opportunities for consultation and engagement with tenants and other service users in order that our services reflelf you have any comments or queries on the content of this document, please contact the Housing Planning & Performance Section at Midlothian Council for more information.

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Midlothian Council is committed to ensuring equality of opportunity and combating discrimination through a series of equal opportunities and anti-discriminatory policies. The Council has embedded equalities principles into strategic planning as well as service delivery. Housing policies and services are regularly monitored, reviewed and reported on to ensure that they comply with equalities requirements.

Midlothian Council carried out an Equality Impact Assessment to ensure that the Rapid Rehousing Transition Plan takes the needs of all equality strands into account. The assessment found no evidence that any direct discrimination will arise from any part of the Plan.