

# **SCOTTISH COUNCIL FOR SINGLE HOMELESS**

## **Public Health Legislation in Scotland – a Consultation Response by Scottish Council for Single Homeless**

The Scottish Council for Single Homeless (SCSH) is the national membership body for organisations and individuals tackling homelessness in Scotland. Our members include local authorities, housing associations, voluntary sector organisations and a range of professionals. SCSH has had a long interest in issues relating to health and homelessness and is represented on the Health and Homelessness Steering Group set up by the Scottish Executive. SCSH was also involved in drawing up the national Health and Homelessness Standards which were adopted by the Executive in March last year.

### **General**

SCSH welcomes the consultation relating to Public Health Protection, which we regard as long overdue. We are concerned, however, that the consultation relates only to public health protection, and believe that a wide ranging review of all public health legislation, regulations and guidance is long overdue. We would recommend that the opportunity is taken to build on the responses to the current consultation to feed into a comprehensive review of public health in Scotland.

### **Housing and health protection**

It is important to recognise that housing (house conditions and types of housing in particular) plays a significant role in relation to public health and wellbeing. There is well documented evidence about the impact of damp or overcrowded conditions on the health of those who live there. The important links between housing and health do not feature in the consultation paper. SCSH recommends that there should be an explicit recognition of the important links between housing and health in the final recommendations arising from the consultation.

SCSH is also aware that there is an increasing mismatch between the types of housing available and the requirements of an ageing population, many of whom will have some form of incapacity. Proper adaptations to houses to enable those with disabilities or other health related problems to live successfully, and prevent a deterioration in their condition is crucially important. It is feasible to project with some accuracy the numbers of people who will require adapted houses in the future. Current provision is inadequate and this aspect appears not to feature in forward strategic planning. SCSH therefore recommends that this aspect form part of strategic planning for the future between Health Boards and local authorities.

## Specific issues

Although Scotland has adopted some of the most progressive policies in Europe towards tackling homelessness, there is still a significant population who are homeless or living in unsettled or temporary accommodation. They face particular issues relating to health protection. For example we are aware of a growing issue of TB, which is growing increasingly drug resistant, in London. This is likely to spread. Homeless people are particularly at risk both of acquiring TB, and being unable to complete treatment. The fact of living in unsettled accommodation, and in some cases having a fairly chaotic lifestyle make the long treatment time for TB difficult for many of them to complete. This in turn may lead to greater drug resistance in the TB bacteria. We are aware of interesting work conducted in England on this subject. We are also aware that in former plans draconian measures were considered (including locking up homeless people to ensure compliance with treatment). We would urge further consideration of this issue to ensure a plan is made which respects the human and civil rights of homeless people affected by TB whilst making both clear provision to minimise the chances of the spread of TB and to minimise the chance of it becoming more drug resistant.

We have concerns too about the situation of children in homeless families living in temporary accommodation. Apart from the well documented effects on emotional, educational and physical development, there are practical issues relating to ensuring immunisations are up to date and all of the regular health protection measures are delivered.

Professional workers working in homelessness projects are often working with some of the most vulnerable individuals, many of whom face multiple problems. It is our experience that even in projects where 24 hour cover is essential workers in such projects are not entitled to free flu vaccinations as essential workers. In most areas it is left up to the voluntary organisation which employs them to find the money to pay for flu jabs. We would recommend that such workers be considered to be providing an essential service to vulnerable people and as such that they should be entitled to free flu vaccinations.

## Conclusion

SCSH has limited our response to areas where our members have a major interest. We will be happy to elaborate on any of the points raised in the paper, and are, of course, happy for its contents to be made publicly available.

Robert Aldridge  
8 January 2007

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Sean Doohan  
Scottish Executive Health Department  
Public Health Team  
Scottish Executive Health Department  
3 E (S), St Andrews House  
Regent Road  
Edinburgh  
EH1 3DG

Dear Sean,

### **Public Health Legislation in Scotland: A Consultation**

Please find enclosed a copy of the response by the Scottish Council for Single Homeless to the Scottish Executive Consultation: Public Health Legislation in Scotland.

I trust you will find the comments helpful. If there are any issues you wish to discuss further or on which you would like clarification please do not hesitate to get in touch.

SCSH is happy for the response to be made publicly available. An electronic copy of this submission was sent on the 8 January 2007.

Regards,



Robert Aldridge  
Director

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