



**Simon Community Northern Ireland Response
Housing Benefit Reform –Supported Housing Consultation**

October 2011

The Simon Community NI is pleased to respond to the Department for Social Development's consultation on Housing Benefit Reform –Supported Housing.

About the Simon Community Northern Ireland

Simon Community NI is one of the leading homeless charities in Northern Ireland. We are committed to our vision of 'ending homelessness' and provide accommodation, advice and community support for individuals and families who are threatened with homelessness or who experience homelessness. We recognise that addressing homelessness involves more than providing accommodation and we have developed a range of services to meet other needs associated with being homeless including: Rent and Deposit Bond Scheme, Harm Reduction Service, Homelessness Prevention Programme, Central Access Point; a 24/7 helpline providing advice and support to those who are homeless or at risk of becoming homeless. We are currently developing a Client Representative Service.

Introduction

Supported housing makes community living possible for many people who would otherwise be in institutions or homeless. The majority of accommodation based services for homeless people where Housing Benefit is used to pay for rent and other housing related services are classified as 'Exempt Accommodation'. Accommodation for vulnerable people generally costs more, and the exempt accommodation status reflects this.

Simon Community NI welcomes proposals to simplify and create a more transparent Housing Benefit system and increasing choice for housing benefit claimants which can often be complicated and confusing. We are concerned, however, that the Department has outlined specific policy targets with little detail of how these targets will be achieved or brought about.

The new arrangements should include adequate safeguards for vulnerable tenants. Some groups in particular will not be in a position to move. They may also encounter problems managing their finances and may face problems as a direct result of not having Housing Benefit paid directly to their landlord.

Northern Ireland Circumstances

As Northern Ireland is not referred to in the DWP's proposals it seems fair to assume that the circumstances in Northern Ireland have not informed these measures. Proposals to remove or lessen entitlement to social security assistance must be considered in the Northern Ireland context. Housing Benefit arrangements in Northern Ireland differ notably from those in Great Britain for example:

- There is no equivalent to Rent Officers, instead all arrangements are made through the Northern Ireland Housing Executive.
- LHA is also administered differently in Northern Ireland, with the continuation of direct payments to landlords in approximately 25% of the cases.

Rent levels for Supported Housing in Northern Ireland are less than those in the rest of the United Kingdom and also the system for determining the amount of Housing Benefit that contributes to the rent in Supported Housing. The current system is considered to be efficient and effective in meeting the needs of the people, within Northern Ireland, who are vulnerable and/or have a disability.

Questions

1. What types of supported housing are available and how do you suggest they should be identified and grouped?

The consultation document provides a comprehensive overview of the types of supported housing available. We recommend however, rather than the two groups suggested, there should be four categories as follows in order to recognise the type and level of care required:

- Sheltered Accommodation
- Hostel Accommodation
- Foyer Accommodation
- Supported Housing

The consultation paper implies that conventional supported housing –including hostels, foyers and refuges, houses people with low or negligible support needs. From our experience individuals using these services require intensive levels of support, albeit often for shorter periods.

2. Should there be different geographical rates for each type of mainstream supported housing, such as hostels, sheltered housing or refuges or should a single rate be applied.

We agree with the introduction of differing rates based on geographical variations according to accommodation type and facilities available. We understand that there is a strong proposal to link rent levels to Local Housing Allowance, however, no clarity has been given as to what rate specifically would be administered e.g Shared Accommodation Rate levels, one bed level or a new rate altogether. Given the reduction of LHA to 30 % rather than the median, the impact of the possible introduction of a specialised LHA rate, plus a percentage for additional costs, should be thoroughly investigated.

3. What types of additional activities or resources are typical of supported housing and how should these be quantified into a weekly amount per unit?

There are normally greater housing management costs, including wear and tear on furniture, repairs and maintenance, enhanced housing management staffing levels, enhanced staff training needs and in many cases increased security costs associated with the provision of supported housing. These costs should be assessed and calculated for each individual unit of housing. It may, however, be difficult to find a representative average cost per unit as there could be wide variations depending on the needs of individual residents which could change as each tenancy changes.

4. Should an amount for the additional help be worked out using a flat rate addition representing typical additional costs or should a different

method be used? Please tell us what you think are the advantages of the preferred option.

We are pleased that this consultation recognises the additional costs of providing supporting housing. We are concerned, however, that another source of funding for people who are homeless could be undermined at a time when many other projects are facing reductions in the level of financial support received.

The potential re-definition of what constitutes supported housing, and the introduction of caps and flat rates for additional costs, could lead to one-size fits all services which are unable to assist people who are homeless with the most complex problems. Simon Community NI is concerned that a one size fits all approach to Housing Benefit and supported housing will be imposed in Northern Ireland and this will impact negatively on vulnerable groups to whom the current level of benefit is necessary.

5. What types of supported housing would fall into this group and how do you suggest they should be identified.

We believe the categories which we have outlined above in Question 1 should fall within this group.

6. What types of higher housing cost are typical of this type of supported housing that are over and above adaptations or specialist equipment , which have funding sources elsewhere and should these be quantified?

We are concerned that the consultation document does not set out concrete proposals as to what a reformed model will be, but rather a range of areas DWP wishes to investigate, and what the end goal should be.

Simon Community NI welcomes reform that seeks to improve vulnerable and disabled people's access to supported housing .The consultation document outlines some positive proposals to direct Housing Benefit. We would welcome further clarification on the proposed reforms, particularly when the underlying

objective remains cost neutrality. We are concerned that reform hindered by budgetary targets risks undermining the aim of ensuring the provision of adequate supported housing.

We agree that there are many policy and operational issues to work through. We look forward to the publication of further information on this matter in due course.

7. Would the additional help for those with very individual housing needs be better met from separate funding administered by local authorities, expert in providing housing and/or care in the community.

These proposals are based on local authority processes and the responsibility of local authorities in Great Britain for housing and social services. In Northern Ireland, these functions are managed by the Department for Social Development, Northern Ireland Housing Executive, Department of Health, Social Services and Public Safety and Area Health and Social Care Trusts.

We are concerned that some of these broader questions in this consultation could open the potential for much wider reform in the context of housing and the social care system. Simplifying Housing Benefit for ‘exempt’ accommodation in the context of wide scale reform and cuts to services brings additional risks to vulnerable tenants and providers.

8. Which tier of local government should have responsibility for deciding how extra help should be allocated? And, which department within a local authority do you think is best placed to manage the allocation of this funding?

As in question 7, local authorities are not responsible for the administration of funding in Northern Ireland but the Northern Ireland Housing Executive. The current arrangements in Northern Ireland are considered to work well and should remain in operation accordingly.

9. Should a different method be used? If so please explain.

We believe that the arrangements in place for Supported Housing in Northern Ireland are fit for purpose.

10. How can funding be made significantly flexible to changing caseloads and demand without being unlimited or increasing costs compared to the existing system?

We understand that the impetus to simplify the system arises from the current processes and the future implementation of Universal Credit in 2013. Simon Community NI looks forward to the publication of further details as to changes in line with Universal Credit. We believe that social need should be the object of funding distribution and whilst we recognise that there is a limit to funding levels available, we recommend that Discretionary Housing Payments, both in terms of the amount available and the policy concerning eligibility, are explored further to ameliorate the negative impact of these proposals.

11. Is there a case for considering housing costs more fundamentally within a wider context by having the additional costs associated with supported housing taken out of Housing Benefit altogether and administered locally in the same way as Personal Budgets?

Personal Budgets are not in existence in Northern Ireland, however, we believe that integrating additional costs into another area of care would be unwelcome development.

Reform of Housing Benefit based on a personalisation agenda is problematic. Some individuals will be unwilling and unable to take control of a personal budget and in the instance of someone with an active substance misuse need, this could have a negative impact. For some vulnerable service users direct payments to landlords are essential. By denying tenants the opportunity to opt for payments to be made to their landlord, the government is failing to provide them with options to make informed decisions about what is best for their personal circumstances.

This is not compatible with the government's objectives of personal responsibility and choice. This system should be developed in such a way that personal budgets are phased in on the basis of mutual agreement, need and risk assessment.

We note that any reforms should be cost neutral. We would welcome further information as to the repercussions should the costs in reform be higher than expected e.g will Discretionary Housing Payments meet the cost?

12. Would this approach be appropriate for those that live in more specialised or adapted properties?

A general model or approach would not be suitable for individuals included under the framework for supported housing. Varied client groups and individual cases tend to bring a number of different challenges which have to be understood and managed appropriately.

13. Should the supported housing of registered providers be treated in the same way for Housing Benefit purpose, as their mainstream housing?

Housing Benefit for supported housing requires a different type of assessment process than for mainstream housing. Northern Ireland follows a different assessment process than that currently in existence in the United Kingdom which is seen to be efficient, fair and relevant to Northern Ireland.

14. What do you think of the proposed categorisation of supported housing ; is there a sound basis for treating these three types of supported housing differently?(registered providers, those who can be identified by their accommodation type and those with more intense, individuals needs)

We note the consultation proposes including the private rented sector under the exempt accommodation status in order to target help by 'accommodation type rather than type of landlord'. We welcome this in principle, however, we have reservations about the potential impact this may have on the market for supported and specialist housing. Private sector landlords providing accommodation with

support provided by existing voluntary sector services is a model that is already working well and will be increasingly important as the private rented sector is used to provide housing for those in need . Furthermore, we are concerned about the private rented sector providing support services on the principle basis that these providers would not be subject to the same regulation as those operating in the voluntary sector and that the quality of support services could be at risk.

15. Is the process of rent –officer referral sufficient to ensure that only ‘reasonable’ supported accommodation costs are met in the registered provider sector? Are there ways in which the rent referral process could be improved?

The role of rent officers is not applicable in Northern Ireland. Section 72 and 73 of the consultation suggests that there will be a review of how service charges are handled, however, no further details are provided. We believe that service charges should cover real costs within supported housing and it is important that these remain eligible for Housing Benefit. The implications of this review need to be carefully considered as changing these rules has the potential to make particular schemes unviable.

16. How do you think the new rules should be introduced?

We trust that there will be an extensive information and publicity campaign to inform Housing Benefit recipients of these changes. Measures should be taken to ensure an adequate period of transition. We would like to reiterate that the current provisions in Northern Ireland are fit for purpose and we would recommend strong consideration be given as to whether these measures should be introduced.

Conclusion:

These proposals were clearly drafted in a Great Britain context and there is no evidence that Northern Ireland’s specific circumstance were considered. Simon Community NI would suggest that strong consideration be given as to how suitable

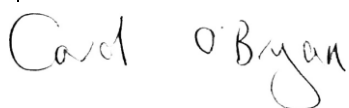
the consultation proposals are within the Northern Ireland context and whether it is reasonable to overhaul a system that is working effectively in order to bring it into line with the English model.

We agree that there are many policy and operational issues to work through. We look forward to the publication of further information on this matter in due course.

The Simon Community NI welcomes the opportunity to respond to this consultation. If there is any further way in which can participate in the consultation process we would welcome the opportunity to do so.

For further information about this consultation, please contact

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