



Addressing Homelessness

Housing Selection Scheme

Preliminary Consultation Paper Response

June 2011

The Simon Community Northern Ireland welcomes the opportunity to respond to the Northern Ireland Housing Executive's Housing Selection Scheme, Preliminary Consultation Paper

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, Client Representative and Central Access Point; a 24/7 helpline providing advice and support to those who are homeless or a risk of becoming homeless.

Introduction

The Housing Selection Scheme represents a single assessment gateway into social housing in Northern Ireland, allocated on a permanent basis, whether owned and managed by the Northern Ireland Housing Executive (NIHE) or any of the registered housing associations in Northern Ireland. It is clear that the Minister, the Department for Social Development and the NIHE have a joint role to play in the Housing Selection Scheme and the provision of social housing. Simon Community NI recognises that reviewing the Housing Selection Scheme is important in ensuring a sensitive and equitable approach to assessment of need. We were pleased to take part in the research project regarding local connection in allocation carried out, by the NIHE, in 2005.

We look forward to the publication of further information about the analysis of possible options for change in order to ascertain the potential impact on applicants' positions on the waiting list.

We provide further insight into our thoughts below:

Intimidation-The Scope and the Role of the Current 23 Rule

Do you agree that based on a risk removal approach to intimidation, and given the changing political situation in Northern Ireland, as well as the tools available to address serious disputes and harassment, intimidation cases should no longer attract absolute priority for rehousing through an additional award of 200 points under the Scheme Selection?

We understand that Rule 23 originates from 'The Troubles' and has since been extended further to conform to equality legislation. We support the retention of reference to political reasons for intimidation within the Housing Selection Scheme. Despite Northern Ireland's increased political stability, 406 cases of intimidation occurred in 2009/2010. Whilst we welcome the use of preventative measures such as

the Hate Incidents Practical Action Scheme we are unsure as to whether these can fully address serious and high risk cases. Furthermore, in order to improve equity within the definition of intimidation we believe it should be expanded to include race and domestic violence cases.

Under the Human Rights Act (1998), the State has a duty to ensure that its citizens are protected (Article 2) and have the right to respect for their private life and family home (Article 8). Where these rights have been violated by intimidation, we think it insufficient for the Housing Executive to offer victims temporary accommodation only. These circumstances are unique and are unlike other reasons for placing homeless households in temporary accommodation.

The level of points awarded under the Housing Selection Scheme does not necessarily have to amount to 200, however, it should be proportionate and sufficient to ensure that the victim's loss of home is remedied as soon as possible.

Do you believe that if the 200 Intimidation Points currently awarded under the Scheme were to be removed, the Primary Social Need factors adequately recognise and give due weight to the range of circumstances in which a person is forced to leave their home because of violence or serious risk of violence or lose their home because of an unforeseen disaster e.g fire/flood.

We are mindful that the removal of the 200 Intimidation Points currently awarded under the Selection Scheme should be reflected in the Primary Social Needs (PSN) factors and weighted with satisfactory point awards to ensure that permanent rehousing can be offered promptly to victims of intimidation.

We would welcome further information about these PSN factors so as to determine whether they can address the range of circumstances in which a person may be forced to leave their home because of violence or an unforeseen disaster.

Applicants living in unsuitable accommodation

Do you agree that a range of circumstance relating to unsuitable accommodation should be given greater recognition through the Housing Selection Scheme, thereby reducing the need to seek redress through the homeless legislation?

We agree that there are a range of circumstances that could be more appropriately recognised with an appropriate award of 'unsuitable accommodation' points through the Housing Selection Scheme rather than utilising homelessness legislation. We are concerned that only 4% of applicants on the waiting list currently receive these points. We would welcome further analysis of the narrowly defined criteria for the award of this housing need factor and the weight accorded to such need (10 points) so as to identify whether it can successfully account for unsatisfactory living arrangements.

We are concerned that some applicants may continue to live in extremely unsuitable accommodation which could be detrimental to their health, mobility, personal finances and quality of life. We, therefore, continue to support the legal rights of households who are assessed as homeless because they are living in unsuitable accommodation.

Homeless Applicants in Temporary Accommodation

Do you agree that additional Interim Accommodation points should be awarded after further periods spent in temporary accommodation?

Simon Community NI supports this proposal to award additional interim accommodation points for Full Duty Applicants in temporary accommodation. We believe it is inappropriate for people to stay in such accommodation for long periods of time which are inappropriate, and, therefore, welcome the awarding of points incrementally relating to length of time. We recommend awarding additional points after a shorter period, than 6 months, which would facilitate appropriate move on for individuals who are able to move on to and maintain independent living.

We would like to highlight the principal of ‘housing first’ i.e. moving directly to self contained accommodation, with support where needed, which is a better option for homeless individuals. We, therefore, recommend consideration is given to the type of accommodation provided to homeless individuals and as to whether other forms of accommodation should be entitled to the awarding of additional points regarding length of time.

Do you have any views on whether any such additional points should be awarded to

- a) Statutory homeless applicants placed in temporary accommodation arranged by the Housing Executive only; or**
- b) Statutory homeless applicants who are either placed by the Housing Executive or make their own alternative accommodation arrangements; or**
- c) All statutory homeless applicants**

Simon Community NI believes that all statutory homeless applicants should receive additional points regardless of whether they have been placed by the Housing Executive or not. Many homeless people move from one form of temporary accommodation to another without being settled and can lose out on points due to the uncertainty of their tenure.

Access Criteria for Transfers

Do you agree that transfer access criteria should be included in the Statutory Housing Selection Scheme?

We support the inclusion of transfer access criteria within the Housing Selection Scheme for those who have been involved in anti-social behaviour. This would be an invaluable tool in preventing manipulation of the transfer system which is detrimental to social housing.

Do you agree that the transfer access criteria should contain provisions to enable social landlords to refuse transfer request in circumstances where the tenant has been involved in anti-social behaviour?

We support the introduction of this proposal where all other avenues of support have been explored to address problems of persistent anti-social behaviour. We agree that penalties should be consistently applied to housing policies such as access to secure tenancies and allocations to housing and homeless assistance.

Whilst we agree that identified perpetrators of anti-social behaviour should be penalised, we are concerned that they may become homeless due to their behaviour and we recommend that consideration is given to developing behaviour improvement programmes to assist such individuals.

Equality Responsibilities

Do you have any evidence to suggest that the proposals within this document would create an adverse differential impact on any of the nine equality categories under section 75 of the Northern Ireland Act 1998?

We are concerned that changes to unsuitable accommodation could adversely impact on older age groups and those with a disability if the points awarded are not sufficient to successfully account for unsatisfactory living arrangements. Recourse to homelessness legislation must continue to be upheld in such cases where households are assessed as homeless due to their unsuitable accommodation.

Conclusion:

Simon Community NI recognises that it is important to have an accurate assessment of housing need in Northern Ireland, however the housing selection scheme is not in itself a means of addressing need. The capital budget for building new social homes has been severely cut and unless new ways of financing improvements and new build housing can be found, it is likely that the need for social housing will continue to increase.

Simon Community NI is pleased to respond to the NIHE. We trust you will find our comments helpful. If there is any further way in which we can contribute to the consultation process we would welcome the opportunity to do so.

If you should require any further information about this consultation response, please contact:

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