



Northern Ireland Housing Executive
Draft Homelessness Strategy 2011-2016

Simon Community NI Consultation Response

August 2011

The Simon Community Northern Ireland welcomes the opportunity to provide comment on the Northern Ireland Housing Executive's Draft Homelessness Strategy 2011-16.

About the Simon Community

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 Simon Community NI supported the introduction of the Housing (Amendment) Act (NI) 2010 which placed a statutory duty on the NIHE to develop and publish a five year homelessness strategy and to provide 'advice about homelessness and the prevention of homelessness'. We believe the interests of homeless people can effectively be safeguarded through the statutory requirement to publish a robust homelessness strategy.

Simon Community NI supports the overarching vision of the Strategy 'that long term homelessness and rough sleeping can be eliminated across Northern Ireland'. Although we support the strategic objectives underpinning the Strategy; to place homelessness at the forefront of service delivery, to reduce the length of time households experience homelessness by improving access to affordable housing, to remove the need to sleep rough and to improve services to vulnerable homeless households, we have made further comment in the body of our response about the degree of overlapping contained within them.

We believe that the introduction of a new strategy should act as a catalyst for innovation and good practice in addressing homelessness. In our response we set out some general comments and issues specific to the strategic priorities and we recommend further consideration as follows:

- The Strategy should set out specific targets and deadlines to be met by key stakeholders over the lifetime of the Strategy.

In addition, we argue that the Draft Homelessness Strategy 2011-2016 should act as a catalyst for:

- The monitoring and assessment of the impact of the planned public spending cuts,
- A long term solution to rough sleeping,
- Ensuring that the needs of homeless applicants are considered in all relevant government strategies,
- Accessibility to affordable housing.

General Comments

The comprehensiveness of the Draft Homelessness Strategy 2011-2016 is severely limited by gaps in policy detail and lack of information outlining specific measurable actions. While the Strategy usefully identifies a wide range of issues that contribute to homelessness, it does not set out a corresponding range of specific targets to alleviate homelessness over the lifespan of the Strategy. We cannot identify any measurable objectives against which progress can be assessed. In our view, this greatly lessens the functionality of the Strategy and will render effective monitoring of delivery on homelessness hard to achieve. Furthermore, the lack of a detailed delivery plan will make it difficult for accountability to be exercised over progress under the Strategy. Moreover, there are no deadlines in which objectives should be implemented, or, for the production of Local Action Plans. We would welcome further clarification on the

timelines to be expected during the lifespan of the 5 year strategy. Simon Community NI looks forward to responding to the detail of a robust implementation plan in due course.

We support the specific inter-agency approach to addressing homelessness contained within the document. We are disappointed, however, that reference has not been made to specific responsibility and actions key agencies should undertake in the ‘spirit’ of the Strategy. The Housing (Amendment) Act 2010 states ‘A homelessness strategy may also include provision relating to specific action which the Executive expects to be taken by any statutory body with functions [...] which are capable of contributing to the achievement of any of the objectives mentioned in paragraph or by any voluntary organisation or other person whose activities are capable of contributing to the achievement of any of those objectives’.

We would also support the inclusion of more explicit cross-departmental co-operation within the Strategy in order to recognise the complex issues associated with addressing homelessness. We are concerned that the provisions contained within the Housing (Amendment) Act 2010 regarding cross-departmental and inter-agency co-operation have not been explored further within the Strategy. The previous Homelessness Strategy ‘Making a Difference to People’s Lives’ illustrated the broad range of policy areas relevant to addressing homelessness, highlighting the need for the development of greater joined up co-operation between government departments. In order to realise this co-operation, commitment must be secured from all relevant government departments to ensure effective support for and implementation of the Strategy.

We note the European context influencing the development of the Strategy. We would welcome further information about the correlation between European directives and the Northern Ireland situation including the responsibility they place on NIHE and key stakeholders.

Strategic Objective 1 – To place homelessness prevention at the forefront of service delivery

We support the shift towards early detection of those at risk. It is now widely appreciated that prevention should include a co-ordinated holistic approach both at an operational and strategic level, giving due consideration to personal, interpersonal, social/community factors as well as accommodation needs and unforeseeable crisis. We are concerned that the term ‘holistic’ has not truly been realised within this objective and refers only to health issues. We would welcome the inclusion of education, training and employment within this approach.

We support the role of timely and appropriate advice which is generally recognised in the prevention and alleviation of homelessness. We would welcome the enhanced training of NIHE staff and frontline staff, from other agencies, administering advice to ensure consistent quality of advice provided. We welcome the intention to develop personalised support through money advice, floating support and measures to address anti-social behaviour.

We are aware that homelessness varies in extent and character across Northern Ireland. We, therefore, support the development of assessment services outside of Belfast. We believe the assessment process can be achieved through the use of CPN, DACT and local community nurses without the explicit need for a dedicated team. There should, however, be clear referral routes and a requirement for assessments to be carried out within a specific timeframe. The Promoting Social Inclusion subgroup should be facilitated by the Department of Health, Social Services and Public Safety, the Health and Social Care Board, the Public Health Agency and the relevant Health and Social Care Trusts as to the development of services outside of Belfast. We look forward to the publication of further information about these developments in due course.

A key personal trigger of homelessness is family breakdown, thus highlighting the need to identify families at risk by helping to reduce relationship breakdown and support. We believe there is a need for greater interaction among agencies and organisations dealing with family mediation and crisis intervention which should

include the introduction of a system of referral and dedicated professional training in local action areas. While restorative work may not prevent relationship breakdown it may prevent homelessness.

We support the inclusion of the private rented sector as a key means of tackling homelessness in high demand areas. We strongly support schemes/opportunities that aim to remove barriers to accessing the private rented sector, including rent deposit guarantee schemes.

On a local level, we believe private landlords are key partners that should be involved in Local Homelessness Action Plans. We believe that there should be a requirement placed on all landlords to seek support for tenants who are at risk of eviction before they can serve a notice to quit. In addition, we believe the role of private landlords, in detecting the risk of tenancy failure, should be explored further.

Simon Community NI understands the importance of tenancy sustainment which is clearly reflected in our services, in particular, our homelessness prevention programme and harm reduction service. We believe that the initiatives outlined within the objectives are appropriate and fit for purpose. We would welcome further information about specific targets against which these objectives can be measured.

We believe one central point of contact needs to be established, and widely publicised. The role of a central access point would provide initial advice and referral onto appropriate organisations and could offer proactive support and advice to reduce tenancy breakdown.

We support the principle of homelessness prevention in the community as an important way of addressing reoccurring homelessness. We support the emphasis on partnership working with the voluntary sector in homelessness prevention and the provision of housing and services. Independent homelessness and tenancy sustainment advice and advocacy services are vital. We would welcome further detail about the role of the voluntary sector and government agencies in delivering the homelessness strategy. Furthermore we believe performance targets should be

outcome based, flexible to take account of local circumstances and place an emphasis on service delivery.

Strategic Objective 2- To reduce the length of time households experience homelessness by improving access to affordable housing

The Simon Community NI supports this objective in principle, however, given the shortage of social housing accommodation, it is unlikely that it can truly be realised without future investment in new social builds. The lack of supply of social housing has been rising for a number of years due to a growing population, reduced new build and increased household formation. There are a number of vacant properties which have been empty due to expensive refurbishment and lack of demand. The Simon Community NI would welcome any new initiatives to encourage empty properties back into use to accommodate homeless people. We would also welcome discussion of the need for increased funding for new social housing construction in tandem with the reform of the Housing Benefit system.

Further consideration should be given to the introduction of many of the Welfare Reform proposals arising from the June Emergency Budget, in particular, the extension of the shared accommodation rate to under 35s. In effect, unless there is significant expenditure on new social housing and subsidy to keep social housing rents below market levels reliance will be solely on the private rented sector and Housing Benefit where the choice will be to pay market rent levels or relocate. We would, therefore, recommend that the Strategy include arrangements for monitoring the impact of planned spending cuts for potential adverse impact on individuals and families on a low income.

We note use of the term ‘affordable housing’; however, we would welcome further clarification as to the definition of ‘affordable’. What indicators will be used to monitor progress on this priority objective? We recommend that affordable housing is linked to local price and ratio and should meet the needs of eligible households. Consideration should also be given as to whether current accommodation provided by the Housing Association Sector is necessarily affordable. As outlined above it is generally understood that the private rented sector needs to become a greater part of

the accommodation solution, however, given the free market it is unclear as to how affordability can be assured without appropriate regulation. We would welcome further clarification on this matter.

The Housing (Amendment) Act 2011 made a small contribution to the increased regulation of Houses in Multiple Occupation (HMO) properties, however, we recommend that further action is needed in relation to the regulation of rent and standard of accommodation in the private rented sector. We believe there is a need for a minimum standard of accommodation to be incorporated into targets and outcomes.

Local Homelessness Action Plans should be developed in conjunction with local providers. There should be a clear emphasis on partnership working and reduction of duplication to improve efficiency and service delivery. Clear targets should be set by the actions plans and providers assessed them on a quarterly basis. We would support the publication of these actions plans to ensure greater accountability and safeguarding of services and support. In addition, local homelessness forums should be set up to facilitate information sharing and problem solving.

As stated above, we support the introduction of further rent deposit guarantee schemes as a form of housing management support in improving accessibility to accommodation. We are concerned, however, that this will be ineffective unless funding is allocated to set against the initial rent or deposits required by the landlords. The Housing Amendment Act 2011 defined a ‘tenancy deposit scheme’ as a scheme which is made for the purpose of safeguarding tenancy deposits paid in connection with private tenancies and facilitating the resolution of disputes arising in connection with such deposits. We would welcome further clarification as to the type of ‘global rent deposit guarantee scheme’ referred to within the Strategy document.

We are concerned by the intention to fund the procurement process only, which we believe will render the scheme ineffective. If the scheme is to remain sustainable there needs to be a shared risk between the NIHE and voluntary sector provider. Furthermore, the scheme should be linked to the appropriate level of community support to provide support to the client and the landlord when there are difficulties

and should be available to those whose financial situation means they cannot afford the initial rent or deposit.

Strategic Objective 3-Remove the need to sleep rough

Rough sleeping is the most visible and extreme form of homelessness. In general, rough sleeping and repeat rough sleeping are almost exclusively linked to alcohol abuse and complex needs, with many of the individuals known to the sector for several years, and the result of a failure to manage their combination problems.

We are concerned that there are no long term solutions to rough sleeping presented within the Strategy. We believe that prevention services should aim to provide long lasting prevention solutions for non-priority groups as well as for those in priority groups. We believe that this objective could easily be incorporated into Objective 1 as a 4th action point under Prevention. Services intended to reduce repeat homelessness should include specialist housing support, psychological services, befriending, and single access points into supported housing, activities which are intended to prevent a second occurrence of homelessness so that a pattern of repeat homelessness does not develop. We believe that further consideration should be given to the provision of long term stay units which offer an ongoing level of support, allowing people to live with drink as in most cases these individuals are not candidates for abstinence. We would welcome further comment on this matter.

We are concerned that the issue of ‘hidden homelessness’ has been neglected within the Strategy, particularly in rural areas. Individuals experiencing hidden homelessness stay in temporary accommodation such as B&Bs or share with friends. They are equally in need and also without a home. We would welcome further research as to the true extent of hidden homelessness across Northern Ireland.

Furthermore, we request that the 2010/2011 homelessness statistics are included within the Appendix of the Strategy as an up-to-date bench mark figure.

Strategic Objective 4- To improve services to vulnerable homeless households

This success of this strategic objective will be measured by the cross departmental and interagency co-operation in meeting agreed measurable targets. We believe that Department for Social Development should be the leader in galvanising departmental cohesion to ensure an effective and joined up approach to addressing and eradicating homelessness. We agree that there is a need to link homeless policy with housing benefit policy, Supporting People, health policies and crime and disorder strategies. We would support the inclusion of those leaving other institutions e.g mental health hospitals. We further recommend the need to mainstream BME issues throughout the Strategy, to take account of different needs and perceptions across cultures.

We are concerned that the issue of homelessness has not been directly linked to budget plans and we would therefore recommend that the Strategy includes arrangements for monitoring the impact of the Welfare Reform measures for potential adverse impact on vulnerable individuals and families with children at risk of homelessness. Moreover, that as an underpinning principle, the Strategy should seek to guard against measures that would impact on progress towards eliminating homelessness across Northern Ireland.

Conclusion:

The Simon Community NI is pleased to respond to the Northern Ireland Housing Executive's Draft Homeless Strategy 2011-2016. We trust that you will find our comments helpful. If there is any further way in which we can contribute to the process, we would welcome the opportunity to do so. We are happy to provide assistance in the implementation of Local Action Plans.

For further information about this consultation response please contact

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