

The Simon Community Northern Ireland welcomes the opportunity to respond to the Department for Social Development's consultation on the 'Northern Ireland Supporting People Guidance 2011'.

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.

The comments made below follow the format of the consultation document.

Introduction

Supporting People is designed to enable vulnerable service users to achieve and maintain independence through housing related support services. Simon Community NI supported the introduction of the 'Supporting People' Programme in 2003. We welcome the Public Target Agreement of assisting 12,000 people which currently helps approximately 23,000 people. Simon Community NI recognises this revised guidance is as an important measure in continuing to target and support the individual needs of programme beneficiaries.

In general terms we support the definitions of housing related support, eligible and ineligible support as set out in the guidance which appear comprehensive and reflect a holistic understanding of housing related need.

We provide further insight into our thoughts below:

Housing Related Support

3.1 Simon Community NI supports the broad spectrum of vulnerable groups eligible for housing related support.

3.2 We are concerned by the use of the terminology of 'grant' which we believe does not adequately reflect the delivery of housing related support. We believe that, de facto, the provision of Supporting People amounts to a contractual arrangement between the Northern Ireland Housing Executive and the service provider. The Northern Ireland 2011-2015 Budget has been realised by the Executive and protection afforded to the Supporting People Programme. We, therefore, recommend that careful consideration be given to the implementation of three year contracts to allow greater stability and consistency of housing related support by the service

provider. Allocation of funding on a yearly basis can prove problematic to the planning, development and delivery of housing related support and can ultimately impact on the quality of services received by beneficiaries.

3.5 We support the commitment within the guidance to the principle of housing related support provision according to need. We recommend, however, the inclusion of rough sleeping and temporary accommodation within this context.

4.0 Eligible Housing Support Services

4.2 The Simon Community NI supports the role of the Commissioning Body. We would welcome further information regarding membership of the Body. In particular, we would like to draw attention to Minister Alex Attwood's comments concerning the inclusion of representation from voluntary sector providers, earlier this month at the Supporting People/CRISSP Conference. We support this proposal and we would like to reiterate his recommendation.

4.8 The Simon Community NI agrees with the eligible housing support services outlined within the document. However, we note some divergence from the Housing Support Services Regulations (Northern Ireland) 2003.

We support the retention of 'more intense support' within '*Advice or assistance to enable a service user to move on to accommodation where less or more intense support*'. Realising independent living for some service users may in fact require increased support which should be reflected within the guidance accordingly.

We are concerned by the removal of '*Providing for the cost of resettlement services*' from the new guidance. Tangible costs are associated with resettling and may restrict the service user in future decisions. We support the retention of this service as an important element in achieving independent living.

We agree with the inclusion of associated support/overhead costs, however, we would welcome further examples of eligible support.

5.0 Ineligible Housing Support Services

We note that there are two definitions of 'personal care services' within this section, through the personal care services defined by the Department of Health, Social Services and Public Safety and the meaning of personal care given by Article 10(3) of the Health and Personal Social Services(Quality, Improvement and Regulation)(Northern Ireland) Order 2003 . We would welcome further clarification as to the range of personal care that will be deemed as ineligible housing support services.

7.0 Accreditation

This section refers to the accreditation process carried out on organisations providing Supporting People services. We note that reference is made to situations in which funding 'may' be stopped, however, we would welcome additional clarification

outlining circumstances when Supporting People funding 'will' be withdrawn from organisations.

We are concerned that a consistent and equitable approach is applied.

9.0 Reserves

We are concerned by the lack of clarity and consistency within this section. There is ambiguity as to when reserves of the Supporting People funding can be carried forward on a year to year basis.

In addition, the guidance fails to identify circumstances in which the NIHE, when administering the Support People funding, can recover unspent money saved by the recipient organisation through delivering efficiencies. We would welcome further clarification as to instances in which recovery of funding will occur.

We trust that, when completed, the Charity Commission for Northern Ireland's guidance on reserves will inform the Department's own guidance and best practice.

10.0 Regulation & Inspection

We are unable to comment on this section as it appears to be missing. We look forward to the publication of this information in due course.

Appendix 4

The Simon Community NI is concerned that Appendix 4's Dossier of Control document is not consistently worded in relation to the current proposed guidance or the existing guidance in the Housing Support Services Regulations (Northern Ireland) 2003. We recommend that further attention be given to this matter.

Conclusion

We look forward to the publication of further information about the next stage in this process and the timeline in which the new guidance will be implemented.

The Simon Community NI is pleased to respond to this consultation. We trust 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.