

Preventing and alleviating homelessness in the face of COVID-19

Policy Recommendations

Introduction

As the leading provider of independent specialist housing advice in Northern Ireland, Housing Rights has been helping people in housing need for over fifty years with advice, assistance and advocacy. Our policy work is based on the experience of our clients and aims to support the identification of evidence based, user informed solutions.

Impact of the COVID-19 Crisis

As COVID-19 continues to impact people across Northern Ireland, our advice teams are dealing with increasing demand for support and advice from people worried about their housing situation because of financial pressures or illness. Housing Rights recognises that the NI Executive are working hard to design and deliver a range of support to assist those impacted by the crisis. **It is imperative that the government's response is characterised by a determination to prevent homelessness.** Specifically, **no-one should lose their home because of COVID-19** and people who need increased support, financial and otherwise, to keep their homes should have access to it quickly.

Cross-tenure social security issues

With the ongoing financial impact of the crisis, the protection afforded through welfare mitigations is more important than ever. It is therefore crucial that the new mitigations legislation **closes the loopholes in bedroom tax and benefit cap mitigations** through which many people are currently falling and **extends the mitigations indefinitely.** In addition, the **co-design mitigations review should be progressed in a timely manner** in order to **strengthen the mitigations to address new challenges** such as Universal Credit, including the two child limit, and cuts to housing benefits in the private rented sector.

These challenges have been heightened as a result of the pandemic. For example, the arrears caused by the 5-week wait before people receive their first Universal Credit payment has been even more acutely felt as a result of the financial impact of the crisis and the steep rise in people claiming UC. **This built in 5-week wait should therefore urgently be removed.**

Participation

People across all tenures, have faced housing problems as a result of COVID-19. Consequently, they have developed an expertise by experience on the impact of the crisis on housing and homelessness, as well as on the support they need to help them find and keep their homes moving forward. This expertise is crucial in ensuring that the steps taken to prevent and alleviate homelessness are effective. The NI Executive should therefore **include people who are experiencing or are at risk of homelessness as a result of COVID-19 in the decision-making process.** Good practice examples of such involvement can be seen in projects in NI such as Renter's Voice¹ and UC:Us,² as well as the Change Team³ in Scotland.

Housing Rights' policy recommendations for each housing tenure are outlined in the tables below.

¹ <https://www.housingrights.org.uk/renters-voice-private-tenants>

² <https://www.ucus.org.uk/recommendations>

³ <https://homelessnetwork.scot/all-in-for-change/>

Private Tenants

Impact of COVID-19	What has happened so far?	What needs to happen next?
<p><u>Local Housing Allowance (LHA) Cuts</u></p> <p>The affordability issues faced by low income private renters, as a result of changes to the calculation of Local Housing Allowance rates over the past decade, have been made even more acute by job loss and reduced income during the COVID-19 crisis.</p>	<p>The <i>Local Housing Allowance rate was realigned to cover the cheapest 30% of local rents.</i></p> <p>While the realignment to 30% is very welcome, there remains a shortfall between this rate and the rent owed by many private renters in receipt of housing benefits.</p>	<p>- Local Housing Allowance rate realigned to cover the cheapest 50% of market rents for 12 months as an emergency measure.</p> <p>- Shared Accommodation Rate removed.</p>
<p><u>Discretionary Housing Payments (DHP)</u></p> <p>DHPs are one of the key mechanisms used by Housing Rights advisers to help people sustain their private tenancies. With job loss and reduced income as a result of the crisis, this discretionary support is even more vital.</p>	<p>The NIHE introduced a <i>13-week rent protection DHP for private renters who have had to apply for Universal Credit as a result of COVID-19.</i> If their housing cost payment from UC does not cover their full rent this DHP will cover any shortfall for 13 weeks.</p>	<p>- Continuation of the COVID-19 13-week rent protection DHP.</p> <p>- Additional DHPs reintroduced to cover the Housing Benefit safety nets which were removed or weakened under UC, such as overlap payments, income shock and death protection.</p> <p>- DHP budget increased to enable to award of higher, longer term DHPs where needed.</p>

<p><u>Evictions</u></p> <p>The heightened affordability issues faced by low income private renters as a result of COVID-19 have left them at greater risk of eviction.</p> <p>The risk of eviction is likely to increase significantly with the end of the job retention scheme and continued job loss.</p>	<p><i>The Notice to Quit period for private tenancies has been extended to 12 weeks until 31st March 2021.</i></p> <p>Until the 31st August 2020 non-urgent court cases were adjourned, meaning most housing possession cases have been postponed.</p>	<p>- Landlords should be encouraged to work proactively with tenants and use alternative methods including the Housing Mediation Service, to find an alternative resolution which would avoid tenants losing their homes.</p>
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People who are homeless

Impact of COVID-19	What has happened so far?	What needs to happen next?
<p>The disproportionate impact of the COVID-19 crisis on people living in the private rented sector has brought into sharp focus the issues with standards, regulation and affordability in this sector and the extent to which it is not suitable for housing homeless households.</p> <p>The threat of COVID-19 has been particularly acute for people experiencing chronic homelessness and has highlighted the interconnectedness of housing, health, social care</p>	<p>A Memorandum of Understanding (MoU) was agreed between the Housing Executive, Department for Communities and the Department of Health to facilitate necessary arrangements to support people with no recourse to public funds, including the provision of temporary accommodation.</p> <p>In order to address the ongoing impact of COVID-19 in a holistic manner, interdepartmental working will continue to play a crucial role.</p>	<p>- It is not appropriate at this time to proceed with the proposal to enable the NIHE to meet their duty to homeless applicants by securing private rented accommodation.</p> <p>-Increase supply of social housing.</p> <p>-Introduce a statutory duty to cooperate on all relevant bodies to prevent and alleviate homelessness.</p> <p>- Adopt a Housing First approach as a long term solution.</p>

<p>and criminal justice issues.</p> <p>The impact has been particularly harsh on people with no recourse to public funds who have not been able to avail of the social security safety nets put in place to support people at this time.</p>		<ul style="list-style-type: none"> - Extend the MoU which supports people with no recourse to public funds until at least March 2021. - Remove the no recourse to public funds condition for 12 months - NIHE to complete a review of homelessness services in partnership with service providers and people who have experience of homelessness.
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Homeowners

Impact of COVID-19	What has happened so far?	What needs to happen next?
<p>Job loss and reduced income as a result of COVID-19 have left some home-owners struggling to afford their mortgage payments. The threat of an economic downturn is of particular concern for homeowners in Northern Ireland where there are a higher percentage of marginal home owners, and a remaining legacy of higher levels of negative equity.</p>	<p>The UK government announced a <i>three-month mortgage holiday for homeowners</i> who were struggling to afford their mortgage payments as a result of COVID-19. <i>A further three-month holiday can be requested up until 31st October 2020.</i></p> <p>COVID-19 places in sharp focus the impact of measures taken by the UK government to weaken Support for Mortgage Interest. It was changed from a grant to an interest-bearing loan and the waiting period</p>	<ul style="list-style-type: none"> - Lenders to proactively engage with borrowers at an early stage to work with them to avoid mortgage arrears where possible. - Lenders encouraged to exercise forbearance with regard to COVID-19 related mortgage arrears - Changes to Support for Mortgage interest reversed to reinstate it as a non-repayable grant that can be accessed after 13 weeks.

	was extended from 13 to 39 weeks.	
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Social Tenants

Impact of COVID-19	What has happened so far?	What need to happen next?
Job loss and income reduction as a result of COVID-19 has increased arrears and therefore the threat of eviction.	An agreement has been put in place between the Department for Communities and all social landlords that <i>any social housing tenant facing rent difficulties due to the COVID-19 emergency will not be evicted.</i>	-Social landlords to adopt a zero eviction into homelessness policy for those tenants impacted by the COVID-19 crisis.