

Housing Rights

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Consultation Response

The Homelessness Strategy, 2017-2022

February 2017

when everyone has a home

INTRODUCTION

Housing Rights is the leading provider of specialist housing advice in Northern Ireland, with over 50 years' experience of advising, supporting and representing clients on housing issues. We believe that prevention is the best cure, and work to prevent homelessness by sustaining our clients' tenancies wherever this is possible. Housing Rights is therefore pleased to respond to the consultation on the Housing Executive's draft Homelessness Strategy 2017-2022.

The response is divided into two sections. The first section (points 1 to 5) focuses on each Objective specifically, and offers comment and suggestions on the actions contained under each Objective. The second section (point 6) considers the outcomes model of the Strategy, and makes several recommendations which aim to maximise the effectiveness of the outcomes model.

SUMMARY

1. Housing Rights welcomes the Strategy's emphasis on prevention. Objective 1 could be strengthened by ensuring **that prevention work is explicitly recognised to be carried out by many community and voluntary agencies engaged in homelessness prevention work, not just the NIHE**. The draft Strategy title and introduction both make reference to working together, however, the substance of the strategy is largely based on the NIHE's internal 'Housing Solutions and Support Teams'. To ensure that this Strategy accurately reflects the current infrastructure involved in this work when it is accessed by an external audience, it must be an externally facing document.
2. **To safeguard the potential of the Housing Solutions model in preventing homelessness in Northern Ireland, it is our view that it is imperative that the NIHE take reasonable steps to safeguard the approach by quality assuring its operation**. The Housing Options experience in Scotland identifies the importance of robust guidance for the operation of the model which could support staff and clients. Additionally, the emphasis on advice provision in the approach, makes it imperative that advice provision is quality assured through the adoption of a Housing Advice Quality Standard.
3. **Housing Rights would welcome involvement in any considerations of a Northern Ireland-specific definition of "prevention of homelessness", and associated measurements and reporting**. As an organisation which currently uses the DCLG P1E definition of homelessness, it is our view that we and others using this definition should be involved in work to agree a common definition for application across the sector.
4. In regards to Objective 2, Housing Rights recommends that **in developing the "Common Assessment Methodology", the Strategy considers the Scottish experience of housing support needs assessments**.
5. Housing Rights recommends that **the Housing Executive could usefully take steps to communicate the rights and entitlements of those with no recourse to public funds to relevant partners, and further improve data collection about the needs of this group**.
6. Our work with people experiencing chronic homelessness, mostly through our Beyond the Gate project, identifies that Objective 3 could be strengthened **if it more appropriately considered what a positive outcome looked like for this client group**. For this group, the 'direction of travel' is an important outcome, Housing Rights would therefore **welcome the opportunity to contribute to the Executive's definition of "sustained housing solution."**
7. The Homelessness Strategy Steering Group (HSSG) could usefully contribute to the Strategy's implementation and evaluation. By **mirroring the role played by stakeholders in the Programme for Government, HSSG members could contribute wider context to the Strategy's work to 'turn the curve'**. HSSG members should also be involved in decisions re data collection.
8. It is our view that the Equality Screening exercise carried out in relation to the draft Strategy, should be published.
9. Housing Rights welcomes the adoption of an outcomes-based approach in the draft Strategy. It is our view that this section of the strategy could be strengthened by **improving alignment between the Strategy and the Programme for Government, removing inconsistencies between Strategy objectives/actions and outcomes, and altering/ expanding the indicators used**. Specific suggestions are made in this regard in Section 2 of this response.

1. Objective 1: To prioritise homelessness prevention

Housing Rights welcomes the Strategy's emphasis on prevention. Housing Rights believes that prevention is the best cure, and our advisers work tirelessly to keep our clients in their homes where this is a viable solution. Several comments are offered to ensure that the Strategy's aim of prioritising prevention is achieved as comprehensively as possible.

Key comments on Objective 1:

- **Housing Rights welcomes the Strategy's emphasis on prevention. Objective 1 could be strengthened by ensuring that prevention work is explicitly recognised to be carried out by many community and voluntary agencies engaged in homelessness prevention work, not just the NIHE.**
- **To safeguard the potential of the Housing Solutions model in preventing homelessness in Northern Ireland, it is our view that it is imperative that the NIHE take reasonable steps to safeguard the approach by quality assuring its operation. This can be achieved through a) robust guidance b) Housing Advice Quality Standard.**
- **Housing Rights would welcome involvement in any considerations of a Northern Ireland-specific definition of "prevention of homelessness", and associated measurements and reporting.**

Homelessness prevention is not limited to Housing Solutions

Housing Rights welcomes the recognition that the draft Strategy makes – both in the title, 'Ending Homelessness Together', and the Introduction, which refers to the work of 'colleagues across the statutory, voluntary and community sectors'¹ – to the important role played by external agencies, in preventing homelessness.

Disappointingly, the substance of the Strategy omits reference to the work of other such agencies, instead focussing exclusively on the NIHE's internal "Housing Solutions and Support Team" approach.

Whilst the Housing Solutions model and the Housing Executive more generally will naturally have a central role in prevention, **Housing Rights strongly believes that the Strategy could be substantially improved if it was amended to make fuller recognition of the contribution already made by other agencies.** The Strategy should not become an internal working document for the Housing Executive.

Indeed, it is particularly important in the context of the growing acceptance by public bodies that homelessness is 'not just a housing problem' that **the wider audience who will be accessing the Strategy understand that homelessness prevention work is carried out by many agencies. The existence of this infrastructure and the value of this work is therefore critical to the external audience who will reference this document as a 'go to' resource on homelessness in Northern Ireland.**

¹ See draft Strategy, p3

Importance of independent agencies in preventing homelessness

Practice in Great Britain demonstrates the vital importance of joint and co-ordinated working across statutory and independent agencies. Housing Rights notes and welcomes the Strategy's endorsement of 'Making Every Contact Count', the 2012 report by the Department for Communities & Local Government.²

This report has highlighted several examples of the value of joint working across and between statutory and independent agencies.³

The value of joint working between independent agencies (those not providing services on a statutory basis) to prevent homelessness, in the context of the Housing Solutions model in Scotland, has also been emphasised by members of the Glasgow Homelessness Network.⁴

In this light, Housing Rights notes the Housing Executive's existing relationships with independent agencies (i.e. those independent of the local authority⁵) – for example, the Community Housing Advice Partnership, through which Housing Rights provides specialist housing advice and training to Citizens Advice Bureaux and Advice NI members across the country.

Housing Rights, at its core, is a housing advice charity that works to improve lives by tackling homelessness and housing issues. In 2015/16, we helped 10,735 people with 43,746 housing issues. **Housing Rights works to prevent homelessness, wherever possible, across all of our work. Using the English 'P1E' definition of prevention⁶, in 2015/16 Housing Rights prevented 1,096 cases of homelessness in Northern Ireland, saving £16.95 million for the public purse.⁷**

As an independent specialist housing advice agency, Housing Rights offer services which are complimentary to the statutory role played by the Housing Executive, as we work to prevent homelessness and resolve housing issues at all stages of the "customer journey." We engage with clients before they have any engagement with the Housing Executive; clients who have engaged with the Housing Executive (and perhaps had an unsatisfactory outcome); clients who are seeking independent advice or support in relation to Housing Executive decisions or actions; and clients who are actively referred to us by the Housing Executive, for specialist advice on their housing issues.

² See draft Strategy, pp9-10 & p15

³ Department for Communities and Local Government (2012) 'Making every contact count: A joint approach to preventing homelessness', pp23-31 for example cites the following examples;

- North Yorkshire Council and District Housing Authorities have worked with Foundation, a voluntary agency, to develop six "hubs" for working with young people at risk of homelessness
- Oxford City Council has developed priority referral arrangements with local Citizens Advice Bureaux for debt advice
- 11 London boroughs have jointly commissioned St. Giles Trust, a voluntary agency, to operate a "Through the Gates" services with clients leaving prison

⁴ See Frew C (2006) 'Practitioner article: The role of advice and information in preventing homelessness' [Shelter](#)

⁵ The definition of 'independent' in advice provision is very important. Usefully, guidance ([Practice Guidance to support Local Authorities to facilitate access to independent financial information and advice under the Care Act 2014](#)) issued by the UK government in 2015 defines independent advice (here, financial advice) as follows;

'Independent means independent of the local authority and will be reflected in the way the financial information and advice service is provided. These services could be provided by through partners such as charities, voluntary sector organisations, and commercial organisations'

⁶ See Department for Communities and Local Government (2009) 'P1E Guidance: Homelessness Prevention and Relief'

⁷ See Housing Rights (2016) 'Impact Report 2015/16', p3

Our advice teams carry out targeted work to sustain homes and resolve problems at the earliest stage:

- Our **Beyond the Gate** project works with repeat offenders across Northern Ireland. By co-ordinating wrap-around support for prisoners upon release, Beyond the Gate advisers work to reduce homelessness on leaving custody, and associated re-offending, by ensuring that their clients are supported with the initial transition back into independent living.
- Our **Tenancy Debt Advice Service** works with tenants of partner social landlords. By engaging with tenants in arrears at the earliest stage and providing budgeting advice, assisting with repayment plans and providing legal representations, TDAS advisers help social tenants to sustain their tenancies.
- Our **Community Housing Advice Partnership** works with front-line advice agencies across Northern Ireland. CHAP advisers provide specialist housing advice and training to generalist and specialist advice agencies across N.Ireland.; Our advisers empower independent agencies across the country to prevent homelessness from their own offices.
- Our **Mortgage Debt Advice Service** provides advice, representation and legal support to clients in mortgage debt. Advisers work with clients and lenders to develop sustainable debt repayments, and represent clients in Court proceedings. In 2015/16, our mortgage debt advice prevented 258 cases of homelessness.
- Our **Prisons Advice Service** offers advice and casework support to clients in HMPs Maghaberry, Hydebank Wood and Magilligan, which works to support clients to a sustainable housing solution upon release. This service also train prisoners to become “Peer Advisers”, who become qualified to deliver initial housing advice within prisons, and gain valuable skills which improve their opportunities upon release.
- Our housing advice website, **HousingAdviceNI.org**, provides independent housing advice and information for the general public across Northern Ireland. In 2015/16, users accessed over 1.6 million pages of content on the site: 200,000 page views related to events that are recognised as common “triggers” for homelessness, such as receiving notice to quit, unsuitable accommodation or relationship breakdown.
- Our **Housing Possession Court Duty Scheme** offers clients free, on-the-day legal advice, and represents clients in Court proceedings with the aim of sustaining the client’s home.
- Finally, our **core helpline and housing advisers** work across all areas of housing law and practice, helping clients resolve their housing issues and prevent homelessness wherever possible. In 2015/16, these advisers dealt with 5,846 cases.

Quality-assuring the Housing Solutions approach

Housing Rights notes the planned roll-out of the Housing Solutions approach across Northern Ireland – the Strategy states that Housing Solutions teams will move from a pilot project operating in 3 offices to full operation in the Housing Executive’s 44 offices in year 1 of the Strategy.⁸

To safeguard the potential of the Housing Solutions model in preventing homelessness in Northern Ireland, it is our view that it would be prudent for the NIHE to take reasonable steps to safeguard the approach by insisting on measures which quality assure the operation of the model.

Research published in 2013 which examined the Scottish experience of Housing Options included recommendations for the adoption of the approach in Northern Ireland. The need for “*an appropriate system for quality assurance*” was emphasised in these recommendations alongside a framework which set out “*standards, policy and procedures*”⁹.

It is our view that quality assurance can be inbuilt to the roll out of the Housing Solutions model in the following ways.

1) Robust guidance for Housing Solutions offices

Housing Rights welcomes the Strategy’s assertion that the statutory homelessness duty will always be applied and that the “*implementation of a Housing Solutions and Support approach will not impact on the rights of a household, but will run in tandem with any necessary homelessness assessment*”.¹⁰ In practical terms, however, it is currently possible that practicing the Housing Solutions approach – in the absence of robust and clear guidance – could result in the Housing Executive failing to carry out a full, statutory homeless assessment, even where this is the best solution for the client.

In the 3 areas where Housing Solutions is being piloted – Causeway, South Down and Belfast – Housing Rights advisers have dealt with several clients who have been subject to gate-keeping in this fashion. Housing Rights further notes that 2 measures currently in the Strategy – “number of households prevented from becoming homeless” and “reduction in instances of repeat homelessness” – could potentially discourage NIHE offices from fulfilling their statutory duties, by placing the focus on the Housing Solutions approach.

This outcome clearly runs contrary to the Strategy’s intention and the spirit of the Housing Solutions model. To ward against this, and to support NIHE staff and clients, **Housing Rights recommends that the Housing Executive introduce robust guidance on the operation of the Housing Solutions model**, similar to that in place in Scotland (for further information on the Scottish Guidance, please see Appendix 1).

2) Housing Advice Quality Standard

⁸ See draft Strategy, p25

⁹ Mahaffy R (2013) ‘Preventing Homelessness: The Housing Options Approach, A Review of the Scottish Experience and Considerations for Northern Ireland’, p27

¹⁰ See draft Strategy, p.17

The provision of housing advice is at the heart of the Housing Solutions approach. Ensuring that such advice is of good quality, will therefore be critical to the success of the NIHE's approach. Housing Rights notes that the 2013 research report on the Housing Options approach referred to above, specifically recognises the need for clear standards;

'If Housing [Solutions] is to be introduced in NI it is our view that a framework should be produced clearly setting out standards, policy and procedures.'¹¹

The Department for Communities strongly identify the importance of Quality standards in relation to the provision of advice;

"Quality standards are a guarantee to people using the service that the information they receive is appropriate, accurate, timely and fit for purpose. A quality standard provides the public and funders with assurance about the quality of advice being provided and the competency of the organisation providing it. An advice quality standard needs to be rigorous, clear and consistent, capable of continuous improvement and independently auditable."¹²

A Generalist Advice Quality Standard has been developed for Northern Ireland. In recognition of the complexities of other areas of specialist advice however, a separate advice quality standard has been developed in relation to debt advice by MAS and there is support for the adoption of one in relation to housing.

It is our view, therefore, that the development and adoption of a Housing Advice Quality Standard is imperative to quality assuring the Housing Solutions approach. That such a standard would also contribute to improving standards of housing advice provision delivered by all agencies involved in homelessness prevention work, adds further weight to the need for such a standard. Housing Rights recommends that the NIHE include a specific action in relation to this under Objective 1. *"Housing Advice Quality Standard agreed and implemented for all relevant agencies across Northern Ireland."*

Use of Housing Solutions and Support model diagram

Housing Rights notes the inclusion, on page 15 of the draft Strategy, of a diagram demonstrating the Housing Solutions model.

Housing Rights understands that this diagram is taken from internal Housing Executive training on the Housing Solutions model. We would recommend that, **in explaining the Housing Solutions model to external audiences, the diagram is simplified and expressed in plain English wherever possible – for example, by replacing the phrase "Establish my Nominal Value" with "Establish what I need."**

Housing Rights strongly recommends that this diagram, and/or any other materials used to train NIHE staff on the Housing Solutions model, is also amended to demonstrate and emphasise that Housing Solutions can run

¹¹ Ibid., p22

¹² DSD (2015) Advising, Supporting, Empowering, A Strategy for the Delivery of Generalist Advice Services 2015-20, accessible at: <https://www.communities-ni.gov.uk/sites/default/files/publications/dsd/advising-supporting-empowering-strategy.pdf> p.19

along-side, but never replace or circumvent, the Housing Executive’s core statutory responsibilities.

Defining “prevention of homelessness”

The medium-term action for Objective 1, Action 2, is stated as ‘Define Prevention Interventions & establish measurements and reporting mechanisms.’¹³

As detailed above, homelessness prevention is a significant area of work for Housing Rights; Housing Rights currently measures and captures homelessness prevention using the ‘P1E’ guidance employed by the Department for Communities & Local Government.

Given the learning which Housing Rights has gained from use of the ‘P1E’ definition, and our experience of putting prevention at the core of our own services, Housing Rights strongly feels that it can make a valuable contribution to any definition of “homelessness prevention.” **Housing Rights believes it is imperative that this new definition is used consistently by service providers from all sectors, and would therefore welcome involvement in any considerations of a Northern Ireland-specific definition of “prevention of homelessness”, and associated measurements and reporting.**

2. Objective 2: To find sustainable accommodation and appropriate support solutions for homeless households

Housing Rights welcomes the draft Strategy’s recognition of the importance of providing appropriate support for homeless and potentially homeless households.¹⁴

Key comment on Objective 2:

- **In regards to Objective 2, Housing Rights recommends that in developing the “Common Assessment Methodology”, the Strategy considers the Scottish experience of housing support needs assessments.**

Common Assessment Methodology and housing support needs

Housing Rights notes that under Action 1 of Objective 2 – “Support homeless clients through to sustainable accommodation solution with appropriate support using suitable housing led pathway models” – the Strategy refers to the establishment of a “Common Assessment Methodology.”

In the experience of Housing Rights’ advisers, provision of tailored housing support services is critical in helping people sustain their tenancies, and reducing repeat homeless amongst vulnerable people. Housing Rights also notes recent evaluations of the Housing First model, referred to in recent research by the Joseph Rowntree

¹³ See draft Strategy, p19

¹⁴ The Strategy acknowledges that ‘given the often extreme vulnerabilities of clients who find themselves [homeless], it is essential that any solution is built around the person if clients are to succeed in sustaining a tenancy in the long term.’ NIHE (2016) p17

Foundation, which found personalised support vital in sustaining the homes of ‘up to 90% of people with complex needs.’¹⁵

Housing Rights recommends that in developing this Common Assessment Methodology, the Housing Executive consider the Scottish experience of assessing applicants’ housing support needs, on a statutory basis, upon presentation. (Further detail of the Scottish model is detailed in Appendix 2.)

3. Objective 3: To further understand and address the complexities of chronic homelessness across Northern Ireland

Housing Rights welcomes the importance which the Strategy places on addressing the complexities of chronic homelessness. The following suggestions are intended to maximise the efforts of the Housing Executive, and all other statutory and other agencies, to tackle this form of homelessness.

Key comments on Objective 3:

- **Housing Rights recommends that the Housing Executive could usefully take steps to communicate the rights and entitlements of those with no recourse to public funds to relevant partners, and further improve data collection about the needs of this group.**
- **Our work with people experiencing chronic homelessness, mostly through our Beyond the Gate project, identifies that Objective 3 could be strengthened if it more appropriately considered what a positive outcome looked like for this client group. For this group, the ‘direction of travel’ is an important outcome, Housing Rights would therefore welcome the opportunity to contribute to the Executive’s definition of “sustained housing solution.”**

“No recourse” clients

Housing Rights welcomes the Strategy dedicating a sub-section to the presence of chronic homelessness amongst those clients with no recourse to public funds.

Housing Rights feels, however, that the draft Strategy could do more to recognise the extent and severity of chronic homelessness amongst “no recourse” clients. Currently, the Strategy states that ‘improved data gathering within frontline services will assist in providing an evidence base on the extent of this issue to inform future policy decisions.’¹⁶

Housing Rights would recommend that the Housing Executive commit, under the Strategy, to:

- **Communicate the limited rights and entitlements of “no recourse” clients, as identified in the draft Strategy, to any relevant partners, who may currently assume that absolutely nothing can be done for such clients;**

¹⁵ Joseph Rowntree Foundation (2016) ‘We can solve poverty in the UK: A strategy for governments, businesses, communities and citizens’, p17

¹⁶ See draft Strategy, p21

- **Further develop the evidence base of “no recourse” clients, by reviewing data collection procedures, to ensure the extent of this problem is accurately captured.**

Definition of “sustained housing solution”

Housing Rights notes that in the draft Strategy, the measure is the ‘Increase in number of chronic homeless clients assisted to sustained housing solution.’¹⁷

Housing Rights’ experience of delivering the ‘Beyond the Gate’ project¹⁸ is instructive in how “sustained solution” could be defined in terms of the chronically homeless client group. **For many chronic homeless clients, such as the Beyond the Gate client base, it is most accurate to assess the client’s individual “direction of travel” in accessing and sustaining housing, rather than (for instance) creating a single time-period threshold that must be reached before a housing solution is “sustained.”**

Housing Rights therefore recommends that the Housing Executive closely involve stakeholders who work with this particular client group, including Housing Rights, in developing the definition of what a positive outcome or “sustained housing solution” for this group may be.

5. Objective 4: To ensure the right mechanisms are in place to oversee and deliver this strategy

Housing Rights welcomes the Strategy dedicating an objective to ensuring that the correct structures are in place to tackle homelessness: given the complexity and cross-cutting nature of homelessness, ensuring effective and co-operative structures will be vital to the Strategy’s success.

Key comments on Objective 4:

- **The Homelessness Strategy Steering Group (HSSG) could usefully contribute to the Strategy’s implementation and evaluation. By mirroring the role played by stakeholders in the Programme for Government, HSSG members could contribute wider context to the Strategy’s work to ‘turn the curve’.**
- **An annual report based on the work of Departments involved in the Inter-Departmental Action Plan, should be presented to the HSSG.**

Need for mid-term, independent review of strategy

Housing Rights notes that in Action 2 under Objective 4, the Steering Group (HSSG) ‘will oversee implementation of the Homelessness Strategy and the Interdepartmental Homelessness Action Plan.’¹⁹

In this light, Housing Rights notes that the outcomes model adopted by the Draft Programme for Government and mirrored in this Strategy, places a high value on stakeholder involvement in ‘turning the curve’. It is envisaged that PfG Stakeholder Groups will assist government efforts to maximise progress against each outcome by

¹⁷ See draft Strategy, p22

¹⁸ See description of Beyond the Gate project in comments relating to Objective 1.

¹⁹ See draft Strategy, p23

meeting regularly to assess progress and providing a broader context to the work ongoing in relation to that outcome. Housing Rights believes that, even with an optimal set of measures/indicators for the Strategy, there is significant value in making provision for the HSSG to consider the broader context of work undertaken by the Strategy.

Housing Rights recommends that, a similar model of involvement could usefully be adopted for stakeholders in relation to the Strategy. Further suggestions regarding the role and function of the HSSG are identified in the comments below.

Annual Report on progress of Inter-departmental Action Plan

Housing Rights welcomes the Housing Executive's commitment to publish an Annual Report on progress of the delivery of Strategy actions.²⁰

Given the importance of the inter-Departmental Action Plan to ensuring effective Strategy structures, **Housing Rights recommends that the Departments involved in this plan return a specific Annual Report on their progress to the Homelessness Strategy Steering Group.**

5. Objective 5: To measure and monitor existing and emerging need to inform the development of appropriate services

Housing Rights welcomes the Strategy's prioritisation of measuring and monitoring need to inform service development and provision, over the lifetime of the Strategy.

Key comments on Objective 5:

- **Housing Rights recommends that the HSSG are involved in decisions made about what data is needed – including data from external agencies – and how best this could be collected.**
- **It is our view that the Equality Screening exercise carried out in relation to the draft Strategy, should be published.**

HSSG should consider what data is needed

Housing Rights notes that in the draft Strategy, the indicator for Objective 5 is to 'Improve data collecting and data sharing mechanisms to inform service delivery.'²¹

Given the scope of the operational changes that will be undertaken within this Strategy – including the roll-out of Housing Solutions, the strategic use of data in Supporting People planning, and the shift to an outcomes model with a corresponding focus on data-driven indicators – **Housing Rights recommends that the HSSG are involved in decisions made about what data is needed – including data from external agencies – and how best this could be collected.** Making use of the experience available in the HSSG and the valuable added context which members could provide, there is also potential for this data to inform the wider policy discussion regarding homelessness.

²⁰ See draft Strategy, p22

²¹ See draft Strategy, p24

Equalities

Housing Rights welcomes the completion of an Equality Screening Report, and would encourage the Housing Executive to publish this, in order to allow relevant stakeholders, including the Equality Commission, to review its findings.

Housing Rights notes the Equality Commission's recent report on key inequalities in housing and communities in Northern Ireland. The report found two inequalities amongst people affected by homelessness:

- **SINGLE MALES.** The report highlights that single male households are more likely to present as homeless to the Housing Executive, but less likely than families to be accepted as homeless.²² The Commission will continue to consider whether this suggests a specific inequality.
- **TRANSGENDER PEOPLE.** The report noted that 'trans people are at high risk of being the victim of hate crimes, including crimes against the person and property related crimes; this is an inequality which can lead to their becoming homeless.'²³

It is therefore essential that opportunities to openly assess how the Strategy positively promotes equality of opportunity, as required under the law, are available.

6. Outcomes model of the Strategy

Housing Rights welcomes the adoption of an outcomes-based approach in the draft Strategy. It is our view that there is potential for improvement of the realisation of the outcomes model in the following areas:

- Greater links between the Strategy and Programme for Government
- Greater alignment between the Strategy's outcomes and the objectives/actions
- Expanding the suite of Strategy measures, to align with the most recent PfG, and
- The difference between the Strategy's outcome>indicator>measure structure and the PfG's outcome>indicator structure,

Housing Rights has below suggested a revised outcome and indicator structure for the Strategy.

By

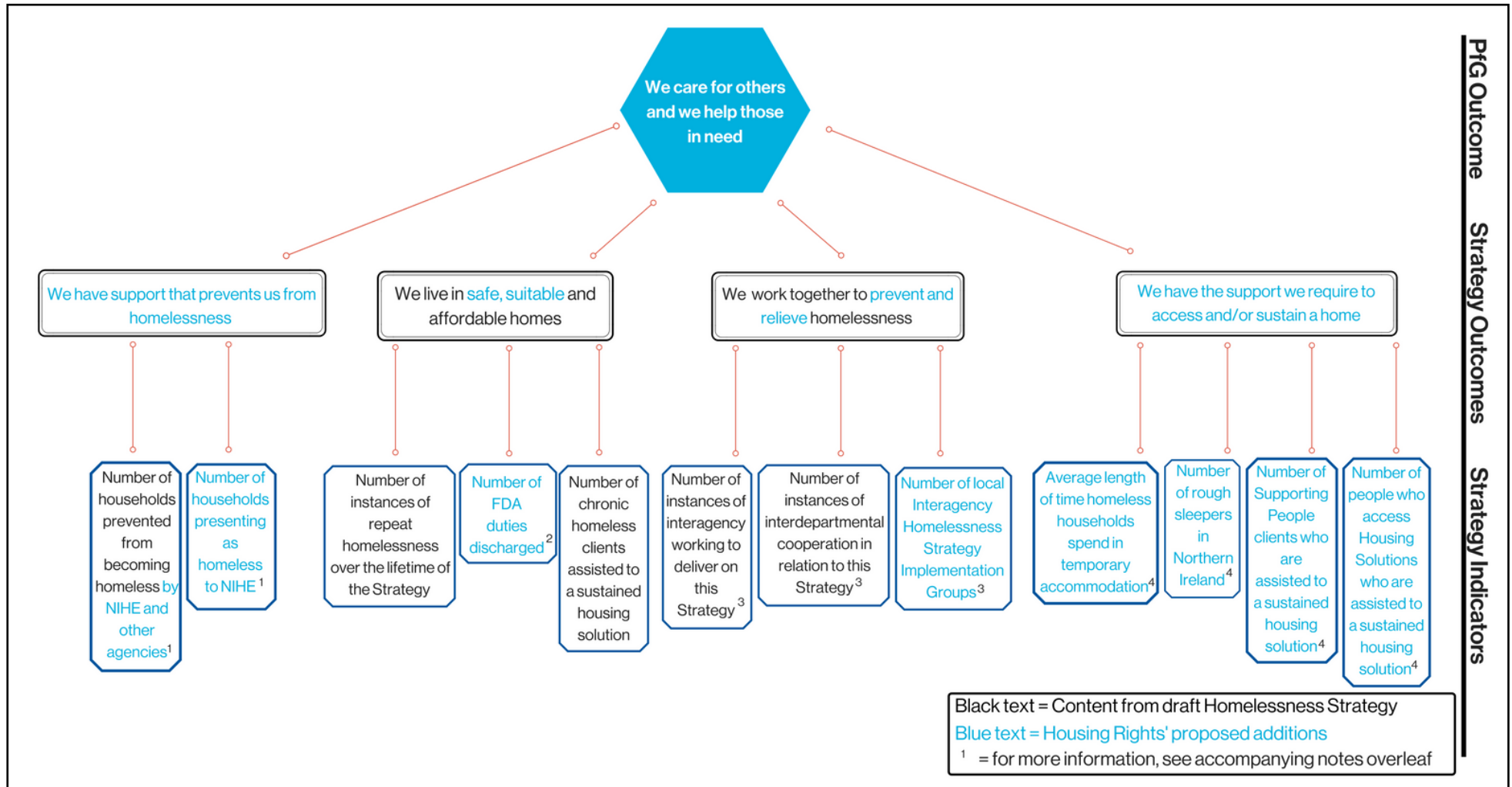
- demonstrating top-level alignment between Strategy outcomes and PfG outcomes;
- revising Strategy Outcomes to more clearly align with the actual actions being undertaken;
- expanding the suite of Indicators used; and
- removing the middle level from the draft Strategy's structure to align with the Draft PfG,

²² Equality Commission Northern Ireland (2016) 'Key Inequalities in Housing and Communities', p ii, 6-7

²³ Ibid., p6 & 8

Housing Rights believes that this revised structure could help to maximise the practical impact of the Strategy's outcomes model, and ensure that the value of the Homelessness Strategy to the Programme for Government is fully demonstrated.

Proposed changes to Strategy Outcomes, PfG alignment & Indicators



NB: The proposed Strategy Outcomes and Indicators are broken down by the relevant Strategy Objectives – identically to the format of the draft Strategy – on pages 17 and 18.

Further information on amended or additional indicators

Outcome	Change	Reasoning
1	<p>Indicator amended: “Number of households prevented from becoming homeless <u>by NIHE and other agencies</u>”.</p> <p>New indicator: “Number of households presenting as homeless to NIHE”.</p>	<p>The indicator is amended to more fully capture the prevention work being undertaken by agencies other than NIHE – see section 1 (specifically pages 3 to 5) above for the reasoning for this.</p> <p>This indicator is added to provide a further indication of whether the outcome – essentially, increasing prevention – is reflected by a reduction in homeless presentations.</p>
2	<p>Indicator added: “Number of FDA duties discharged”</p>	<p>The indicator is added to provide a further indication of whether the outcome – “We live in safe, suitable and affordable homes” – is being achieved, by the actual discharge of FDA homeless households into such homes.</p>
3	<p>Indicators added: “Number of instances of interagency working to deliver on this Strategy”, AND “Number of instances of interdepartmental cooperation in relation to this Strategy”.</p> <p>New indicator: “Number of local Interagency Homelessness Strategy Implementation Groups”.</p>	<p>These 2 indicators are in the middle tier of the draft Strategy. In this structure, where that middle level has been removed to align with the most recent draft PfG, these indicators are moved to the level where they are actually defined and measured. See section 4 (specifically p12) for further detail on inter-agency and –Department working.</p> <p>This indicator is added to measure whether the outcome – working together to prevent and relieve homelessness – is reflected in a growing number of local implementation groups. This number would be expected to increase as Housing Solutions teams are rolled out.</p>
4	<p>New indicators: “Average length of time homeless households spend in temporary accommodation”; “Number of rough sleepers in Northern Ireland”; “Number of Supporting People clients assisted to a sustained housing solution”; and “Number of people who access Housing Solutions who are assisted to a sustained housing solution”</p>	<p>These 4 new indicators are added to reflect the outcome: “We have the support we require to access and/or sustain a home.”</p> <p>This outcome’s focus on chronically homeless clients is reflected in the indicators. Specific attention is given to Supporting People and Housing Solutions, to ensure that they are aligning with the Strategy’s outcomes. For further comment on the definition of “sustained housing solution”, see section 3 (specifically p11) above.</p>

Proposed changes to Strategy Outcomes, by Objective

Objective 1

OBJECTIVE 1: TO PRIORITISE HOMELESSNESS PREVENTION		
PROGRAMME FOR GOVERNMENT OUTCOME “We care for others and we help those in need”		
HOMELESSNESS STRATEGY OUTCOME “We have support that prevents us from homelessness”		
INDICATORS		
Number of households prevented from becoming homeless by NIHE	Number of households presenting as homeless to NIHE	Number of households prevented from becoming homeless by other agencies

Objective 2

OBJECTIVE 2: TO FIND SUSTAINABLE ACCOMMODATION AND APPROPRIATE SUPPORT SOLUTIONS FOR HOMELESS HOUSEHOLDS		
PROGRAMME FOR GOVERNMENT OUTCOME “We care for others and we help those in need”		
HOMELESSNESS STRATEGY OUTCOMES “We have the support we require to access and/or sustain a home” “We live in safe, suitable and affordable homes”		
INDICATORS		
Number of instances of repeat homelessness over lifetime of Strategy (more than one presentation per year)	Average length of time homeless households spend in temporary accommodation	Number of FDA duties discharged

Objective 3

OBJECTIVE 3: <u>TO FURTHER UNDERSTAND AND ADDRESS THE COMPLEXITIES OF CHRONIC HOMELESSNESS ACROSS NORTHERN IRELAND</u>	
PROGRAMME FOR GOVERNMENT OUTCOME “We care for others and we help those in need”	
HOMELESSNESS STRATEGY OUTCOMES “We have the support we require to access and/or sustain a home” “We live in safe, suitable and affordable homes”	
INDICATORS	
Number of chronic homeless clients assisted to sustained housing solution	Number of rough sleepers in Northern Ireland

Objective 4

OBJECTIVE 4: <u>TO ENSURE THE RIGHT MECHANISMS ARE IN PLACE TO OVERSEE AND DELIVER THIS STRATEGY</u>		
PROGRAMME FOR GOVERNMENT OUTCOME “We care for others and we help those in need”		
HOMELESSNESS STRATEGY OUTCOME “We work together to prevent and relieve homelessness”		
INDICATORS		
Number of instances of interagency working to deliver on this Strategy	Number of instances of inter-Departmental co-operation in relation to this Strategy	Number of local Interagency Homelessness Strategy Implementation Groups

Objective 5

OBJECTIVE 5: <u>TO MEASURE AND MONITOR EXISTING AND EMERGING NEED TO INFORM THE DEVELOPMENT OF APPROPRIATE SERVICES</u>	
PROGRAMME FOR GOVERNMENT OUTCOME “We care for others and we help those in need”	
HOMELESSNESS STRATEGY OUTCOME “We have the support we require to access and/or sustain a home”	
INDICATORS	
Number of Supporting People clients who are assisted to a sustained housing solution	Number of people who access Housing Solutions offices, who are assisted to a sustained housing solution

Appendix 1: Prevention of Homelessness Guidance in Scotland

The Scottish Government & Convention of Scottish Local Authorities' (2009) 'Prevention of Homelessness Guidance' states:

'Decisions about the most appropriate use of the "options" approach when an applicant contacts a council to make a homelessness application need to be balanced with the legal duty to respond to the application. It may be entirely appropriate to offer a housing options interview as a precursor to completion of a homelessness application; however, if the applicant is homeless at the time of interview or threatened with homelessness within 2 months, a homelessness application should also be completed. Efforts to prevent homelessness should then progress alongside the routine administration of the homelessness application, particularly where a diagnostic assessment indicates that a real opportunity exists to prevent it.'²⁴

Similarly, Housing Rights notes the learning of a 2013 report commissioned by the Promoting Social Inclusion Homeless Partnership, which studied the operation of Housing Solutions in Scotland:

'In a situation where a person is homeless or threatened with homelessness it may be that a Housing [Solutions] interview is undertaken first and prior to a homelessness assessment being made. The reverse may also be the case. But, whatever the order, it is important that the two processes [the statutory homeless assessment and the Housing Solutions approach] are integrated and that those seeking accommodation are not forced to go down one route or the other.'²⁵

²⁴ See Scottish Government & Convention of Scottish Local Authorities (2009) 'Prevention of Homelessness Guidance', p17

²⁵ Mahaffy R (2013) 'Preventing Homelessness: The Housing Options Approach', p13

Appendix 2: Assessing housing support needs in Scotland

The Housing (Scotland) Act 2010 established that where an applicant is found to be homeless or threatened with homelessness – with the abolition of Priority Need in Scotland, this is anyone who is unintentionally homeless and eligible for state assistance – and the local authority has “reason to believe” the applicant may be in need of housing support services, then the Local Authority must carry out a housing support needs assessment.²⁶

Statutory guidance supporting this Act, published in 2013, defines “reason to believe” very broadly, and emphasises that ‘each case should be considered on its merits, avoiding the adoption of blanket policies.’²⁷ Following a housing support needs assessment, the local authority must ensure that any support services, which the applicant is found to need, are provided to them.

The Housing Support Services (Homelessness) (Scotland) Regulations 2012 defined housing support services as:

- a) *“advising or assisting a person with personal budgeting, debt counselling or in dealing with welfare benefit claims;*
- b) *assisting a person to engage with individuals, professionals or other bodies with an interest in that person’s welfare;*
- c) *advising or assisting a person in understanding and managing their tenancy rights and responsibilities, including assisting a person in disputes about those rights and responsibilities;*
- d) *advising or assisting a person in settling into a new tenancy”*

²⁶ See Housing (Scotland) Act 2010, Article 158; and The Housing Support Services (Homelessness) (Scotland) Regulations 2012

²⁷ Scottish Government (2013) ‘Housing Support Duty to Those Found to be Homeless or Threatened With Homelessness – Amendment to Housing (Scotland) Act 1987 (inserted by Housing (Scotland) Act 2010)’, p6