



Submission to the Programme for Government Draft Outcomes Framework Consultation

March 2021

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Introduction

1. Council for the Homeless Northern Ireland (CHNI) was founded in 1983 to represent organisations working with people experiencing homelessness. Our vision is to see an end to homelessness, and we exist to prevent and alleviate homelessness in Northern Ireland. We do this by working collaboratively to create a community of support, by being the voice of the sector and by delivering direct assistance through our projects.
2. CHNI welcomes the opportunity to respond to the Programme for Government (PfG) Draft Outcomes Framework consultation. We believe the Draft Outcomes Framework has the potential to provide an effective and impactful overarching framework for policy across a wide spectrum of important issues in this jurisdiction. We are, however, disappointed with how housing and homelessness have been considered in the proposed draft document. As this submission will make clear, **we strongly recommend housing and homelessness are considered through their own specific outcome indicator**. We do not believe the current approach utilised in the draft outcomes framework will lead to the best results for housing and homelessness policy.

New Decade, New Approach

3. We are cognisant of the important role the ‘New Decade, New Approach’ (NDNA) Agreement has played in the development of the draft Outcomes Framework. NDNA made a number of commitments regarding housing and homelessness in particular which we believe were positive. One of those commitments was for the Programme for Government to be “*augmented with a new outcome and indicators to provide specific focus on ensuring every household has access to a good quality, affordable and sustainable home that is appropriate for its needs.*”¹ This commitment has not been met in the draft Outcomes Framework. Housing and homelessness are instead considered under several other proposed outcomes. In our view, this is the wrong approach to take and will reduce the effectiveness of the PfG Outcomes Framework if adopted.

Draft Outcomes Framework

4. For CHNI, **it is imperative a specific outcome and relevant indicators are included in the final Outcomes Framework**. Ensuring every household has access to good quality, affordable and sustainable housing is a pre-requisite for the achievement of many of the other outcomes outlined in the Outcomes Framework. For example, it is very difficult to have a society where “*Everyone can reach their potential*” if significant numbers of households here are struggling to find housing appropriate to their needs. We understand that there is a view that access to good quality, affordable and sustainable housing is an enabler of other outcomes, rather than an end in and of itself. Respectfully, we disagree with this perspective. While it is the case that access to such housing does enable other positive outcomes, having housing of this nature is a positive social good and an end in and of itself.

5. We note the comments made in the EQIA consultation document regarding the reasons as to why housing is not included as a standalone outcome. It is stated there that the reason for this is *that “[housing] is a single-issue subject that could unduly focus on the activity of building houses rather than*

on the benefits that flow from people having access to suitable housing.”² While we understand the concern being raised here, we do not believe having a specific standalone outcome necessarily leads to the outcome being suggested here. With the right outcome and indicators, it should not be difficult to avoid an undue focus solely on the activity of building houses. In addition, as the currently drafted outcomes framework itself acknowledges, housing impacts on a wide variety of other issues. Consequently, the idea that housing is a “single-issue” subject can be questioned. As we will go on to explain, there are drawbacks to the approach being taken.

6. We believe it is positive that the PfG is being developed through a process of engagement and co-design. This is an effective way to consult with wider society and ensure a diverse range of voices are heard. However, we are unclear on who the Executive Office engaged with in the housing and homelessness sectors before determining the commitment made to a specific housing outcome in NDNA should not be fulfilled. We would welcome clarity from the Department on this matter.

7. We are concerned about how the draft Outcomes Framework, as currently constituted, considers housing and homelessness within the indicators outlined under other outcomes. Housing and homelessness indicators are currently included under three different proposed outcomes: “*We live and work sustainably – protecting the environment*”; “*We have a caring society that supports people throughout their lives*”; and “*People want to live, work and visit here*”. These three outcomes each have a very different focus and orientation. We are concerned this decision to consider housing and homelessness under three different outcomes may lead to a divided focus on this important issue.

8. It is widely acknowledged that homelessness is unacceptably high in this jurisdiction. The coronavirus pandemic and the accompanying lockdown measures have exacerbated the situation still further. **On December 31 2020 the social housing list stood at 42,665, over 10% higher than it had been on March 31 2020.³ Around 70% of those on the list are in ‘housing stress’ being in priority need.** There has also been a major increase in the numbers of individuals being placed in ‘non-standard’ B&B or hotel accommodation. In Belfast alone, there has been an increase from 179 placements in “non-standard” accommodation during 2019 to 2498 in 2020- an increase of 1295.5% in one year.⁴ This situation is highly likely to deteriorate even further as the lockdown measures are unwound. Too many individuals and families are living in unsuitable accommodation and are waiting far too long for much needed homes.

9. The Acting Minister for Communities, Carál Ní Chuilín MLA, candidly acknowledged when she was in post that “*housing stress is increasing here, despite investment and measures to improve supply and standards, our current system is broken.*”⁵ The PfG needs to reflect the importance of tackling this issue and driving forward real change. We know that the Communities Minister, Deirdre Hargey MLA, views housing rights as a “**priority**”⁶ and believes “**we need to see systemic and transformative change in housing.**”⁷ In a recent ministerial statement Minister Hargey further stated the following:

“I strongly believe that housing is a basic need and right for all. Our Executive policy, as set out in the New Decade, New Approach agreement, aims to achieve a fair and compassionate society that supports working families and protects the most vulnerable. Crucial to that is ensuring that every household has access to a quality, affordable and sustainable home that is appropriate for its needs.”

Housing should be a stand-alone outcome in the forthcoming Programme for Government.⁸

We agree with the Minister's statement. While we accept housing and homelessness are indeed considered in the draft Outcomes Framework as proposed, we do not believe they are given the priority they need to have.

10. In our estimation, it would be much more logical to have a separate outcome for housing and homelessness in line with the approach set out in NDNA with its own relevant indicators rather than seeking to divide the indicators amongst the other proposed outcomes. The three proposed indicators outlined in the outcomes framework are in and of themselves all worthy goals which we do not object to per se. We are concerned however that the phrase "*tackling homelessness*" under the current "We have a caring society that supports people throughout their lives" outcome is too broad and either needs to be fleshed out further or augmented with an additional indicator(s). This would be the case if the current approach is maintained or if a new specific housing outcome was added.

11. In recent years, the stress in policy terms in the area of homelessness has been on preventing individuals and families becoming homeless in the first place. One of the three core aims of the current homelessness strategy is to "*prevent homelessness*" and the first objective of the strategy is to "*prioritise homelessness prevention*.⁹ There is a widespread consensus across the homelessness sector that an emphasis on preventing homelessness is crucial. The term "*tackling homelessness*" does not in our view capture the need to focus on preventing homelessness upstream. In our view, **the indicator needs to be amended to include a focus on prevention** as well as responding to homelessness if prevention is impossible.

12. We submit that there would be value in specific consideration being given to an indicator focused on chronic homelessness. The Housing Executive has produced a "Chronic Homelessness Action Plan" which defined individuals who are chronically homeless in the following way: "a group of individuals with very pronounced and complex support needs who find it difficult to exit from homelessness."¹⁰ The Action plan has developed a specific criteria for capturing data on the number of individuals who are chronically homeless.¹¹ Individuals who are chronically homeless are a small minority of the total homeless population, but they are often the most difficult and complex cases to manage and have the biggest impact in financial terms. The Housing Executive has stated that:

"Based on research conducted elsewhere it would be expected that between 5-10% of the homeless population could be identified as experiencing chronic homelessness. Given that over 22,000 full duty applicants were registered with the Housing Executive at the end of December 2018, it would not be unreasonable to assume between 1100-2200 of these individuals or households could be experiencing chronic homelessness."¹²

Considering the impact chronic homelessness has, we submit a specific commitment to preventing and reducing chronic homelessness in the PfG Outcomes framework should either be incorporated into the proposed indicator in this regard or included in an additional indicator.

13. We note that under the current indicator, “*We have a caring society that supports people throughout their lives*,” there is no mention of any strategies or action plans related to homelessness in the list of “strategies [which] could help deliver these key priority areas.” While we appreciate the list of strategies provided is not exhaustive, we would submit the current homelessness strategy or the upcoming 2022-2027 strategy should be added as well as the Chronic Homelessness Action Plan. **These are important strategic documents for the sector and should be listed.**

14. A further related issue we would additionally highlight is that the Departments of Health and Justice are not viewed as Departments taking ownership of the current proposed indicator related to homelessness. This is incongruous to the reality of how homelessness in this jurisdiction needs to be tackled. The reality is that for progress to be made on this issue we need a cross-departmental approach with ownership of the issue being shared across the Departments of Communities, Finance, Health and Justice. There is a well-established connection between mental and physical health difficulties and homelessness. As the current homelessness strategy notes: “*mental and physical health issues... can... contribute to individuals, families or any group of people of people that normally live together, becoming homeless.*”¹³ Responding effectively to homelessness needs the input of the Department charged with improving health outcomes here: the Department of Health. As the Chief Medical Officer Dr Michael McBride put it in 2018, “*Tackling issues around homelessness requires a partnership approach.*”¹⁴ The Criminal Justice system also commonly interacts with homelessness.¹⁵ Considering the current text of the indicator agreed to referring to homelessness, we can understand why the Departments of Health and Justice were not referred to. As we have outlined above, regardless of whether a specific housing outcome is included or the current approach is continued with we believe the current indicator needs to be augmented with greater detail. Whatever is ultimately decided, we believe the PfG outcomes framework should promote the much-needed cross-departmental work in this area. This requires consideration of the Departments of Health and Justice.

15. We would finally point out that **the fact that there is no housing strategy in place in NI is a further argument in favour of including a specific housing outcome in the outcomes framework.** A housing strategy was produced for the period of 2012 to 2017 which was entitled ‘Facing the Future.’¹⁶ An Action Plan to implement the strategy was published in 2015.¹⁷ However, unlike with the homelessness strategy which is required in statute, a further housing strategy has not been produced following ‘Facing the Future’ in spite of the increasing difficulties our society is facing in this area. This is an example of how housing has not been given the priority it needs to have in the past and provides an illustration as to why we believe a specific outcome is so needed going forward.

Conclusion

16. In conclusion, we recommend the final PfG Outcomes Framework fulfils the commitment made in NDNA to include a specific outcome related to housing and homelessness. In our view, this outcome should be **“ensuring every household has access to a good quality, affordable and sustainable home that is appropriate for its needs.”** It may be the case that the precise wording of this outcome may require amendment and we are open to working with the Executive Office and other organisations to achieve the best wording possible. The current approach runs the risk of seeing housing and homelessness fall between different outcomes and not receiving the attention it badly needs. We are concerned this will reduce emphasis on the issue and fail to provide the necessary accountability to the

Executive in this area as it seeks to drive forward much needed change. We hope this question will be reconsidered in the final PfG Outcomes Framework.

References

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