



Submission

Draft Homelessness Strategy 2022-2027 Consultation

January 2022

homelessconnect.org



Consultation Response

Your Details					
Is this submission on behalf of an:	<table border="1"> <tr> <td>Organisation</td> <td><input checked="" type="radio"/></td> <td>Individual</td> <td><input type="radio"/></td> </tr> </table>	Organisation	<input checked="" type="radio"/>	Individual	<input type="radio"/>
Organisation	<input checked="" type="radio"/>	Individual	<input type="radio"/>		
Name:	Mark Baillie				
Organisation:	Homeless Connect				
Postal Address:	3rd Floor, Andras House, 60 Great Victoria St, Belfast				
Postcode:	BT2 7BB				
Email:	mark.baillie@homelessconnect.org				

Homeless Connect welcome the opportunity to respond to this consultation. It should be noted at the outset that our response has been informed by consultation events with our Public Policy Forum and with the Regional Service User Network (RSUN). These events took place in January 2022.

1	Do you agree with the vision of 'Ending Homelessness Together'?	YES	NO
		<input checked="" type="radio"/>	<input type="radio"/>
<p>We believe the vision of 'Ending Homelessness Together' is the right vision for this strategy. The detrimental impact of homelessness economically, socially and personally has been well documented.¹ The ultimate aim of homelessness policy should be to bring about the end of homelessness. The vision also recognises that the Housing Executive alone cannot bring about this goal. The vision captures the requirement for partnership working towards the goal of 'Ending Homelessness Together'.</p>			
2	Do you agree with the aim of 'Wherever possible homelessness should be prevented, if homelessness cannot be prevented it should be rare, brief and non-recurring'?	YES	NO
		<input checked="" type="radio"/>	<input type="radio"/>
<p>The aim outlined in the strategy is the right one from our perspective. The aim places an emphasis on seeking to prevent homelessness. Preventing homelessness from happening in the first place is hugely preferable to responding to it after it happens.</p> <p>It is acknowledged that even in societies with an excellent record of responding to homelessness (for example Finland), that households can and sadly do become homeless.² However, in such societies, the homelessness experienced by most is "rare, brief and non-recurring." The ideal scenario is for those who lose their home to be able to access the right support at the right time to quickly help them to find a new home. In addition, the right support has to be in place to help households in this situation to maintain their new home. Long periods of homelessness or staying in temporary accommodation can have a damaging impact on those who are affected.</p>			

3	Do you agree with the principles that will guide the delivery of the Strategy?	YES	NO
A	Person Centred	<input checked="" type="radio"/>	<input type="radio"/>
B	Evidence Based	<input checked="" type="radio"/>	<input type="radio"/>
C	Partnership Working	<input checked="" type="radio"/>	<input type="radio"/>
D	Expert Led	<input checked="" type="radio"/>	<input type="radio"/>
E	Responsive	<input checked="" type="radio"/>	<input type="radio"/>
F	Innovative	<input checked="" type="radio"/>	<input type="radio"/>
G	Delivering Value for Money	<input checked="" type="radio"/>	<input type="radio"/>

We agree with all seven of the principles outlined. We particularly welcome the inclusion of “those who have lived homelessness” as a part of the ‘Expert Led’ principle.³ We would submit that this should be rephrased to state “being led by those who have lived experience of homelessness”, but the principle remains the same and very much welcome.

4	Do you agree with the focus objective 1 - ‘Prioritise homelessness prevention;?’	YES	NO
		<input checked="" type="radio"/>	<input type="radio"/>

We believe that this objective should be worded in line with the objective set out on p25: “Prevent homelessness from happening in the first place” which in our view is a more accurate reflection of what we want to achieve. (There should be consistency throughout the document in this regard.)

We do agree that preventing homelessness should be a high priority. The strategy rightly notes that NI is still “focussed largely on responding to people who find themselves in crisis situations” before outlining that the ambition of the Housing Executive is “to prioritise homelessness prevention through the provision of the right support at the right time with an aim to prevent homelessness from happening in the first place.” We wholeheartedly agree with this ambition. As the Scottish Prevention Review Group notes, “Becoming homeless is one of the most damaging situations someone can find themselves in. There is a moral imperative to prevent homelessness, and it is often much easier to prevent than to fix.”⁴

5	Do you agree with the focus outlined in objective 1 that will guide the Year 1 Action Plan? The draft Strategy outlines that actions identified in each year’s Annual Plan throughout the lifespan of the Strategy will focus on the following:	YES	NO
	<ul style="list-style-type: none"> • Primary Prevention Activity • Secondary Prevention Activity • Tertiary Prevention Activity These areas are further outlined on page 29 to 31 of the draft Strategy.	<input checked="" type="radio"/>	<input type="radio"/>

We agree with the focus outlined in objective 1. The use of the trifecta of Primary, Secondary and Tertiary prevention is appropriate and helpful. We would submit that the final document should provide a citation to the research paper where this typology was originally set out so that the terms can be understood in context.⁵ Before turning to consider the actions set out for this objective, we have five comments to make around this section as a whole:

1. The four criteria set out as to “what will success look like” are helpful in so far as they provide a broad picture of success. Ultimately though, the criteria do not provide clear measurables by which to assess success. In the final strategy we would submit the Housing Executive should provide clear measurements by which the success or the failure of the strategy can be assessed.
2. In the Housing Executive’s research on Homelessness Service User Journeys, one of the recommendations set out is as follows: “Preventative strategies need to be embedded in... wider service delivery rather than being solely discrete and separate preventative programmes.”⁶ This is a valid point and one which we would recommend the Housing Executive bears in mind as it seeks to take forward actions to prevent homelessness.
3. At this point we want to flag a particular issue we have with the draft Strategic Action Plan for Temporary Accommodation (hereafter referred to as SAPTA). One of the four “ambitions” outlined in the SAPTA is to “minimise demand for temporary accommodation.” In our estimation, this should not be an ambition within the draft SAPTA. We submit that the SAPTA should instead focus on the provision of temporary accommodation which for the foreseeable future will be a significant part of this society’s response to homelessness. This is not to suggest that minimising demand for temporary accommodation should not be a key objective for the Housing Executive. We believe that some of the actions set out under minimising need for temporary accommodation (p16 of the draft plan) should be incorporated in to the prevention objective of the Homelessness Strategy itself. Many of the actions included there would fall under the rubric of “preventing homelessness in the first place.” We will provide further comment on these actions in our response to the draft SAPTA. The current way in which both documents include objectives or ambitions related to prevention could lead to unnecessary confusion. In our estimation, this is best resolved through considering homelessness prevention in the Homelessness Strategy rather than in the SAPTA.
4. We believe the Housing Executive should conduct a detailed evaluation of the measures adopted to prevent homelessness in this jurisdiction to determine ‘what works’ in preventing homelessness. A fundamental challenge with assessing the actions set out in the strategy is the lack of a detailed evidence base of current measures adopted to prevent homelessness here. It is acknowledged that some assessment of the impact of the homelessness prevention fund has been conducted. However, homelessness prevention activities go beyond the operation of the fund. This point does not fit as an action under the three layers of prevention outlined in the document thus far, but we believe it should be a priority action for the first year of the strategy. Such an evaluation should be conducted in conjunction with the homelessness sector here.
5. We would submit that a further discrete piece of work should be conducted by the Housing Executive on homelessness prevention measures adopted in other jurisdictions on these islands and beyond. This piece of work should not only focus on how other jurisdictions prevent homelessness but also should consider how they assess the effectiveness of homelessness prevention measures. This would help to provide ideas for programmes to adopt to assist in preventing homelessness and would help to provide a comparative evidence base against which to assess the effectiveness of homelessness prevention measures which are currently used here.

Turning to the goals outlined in the draft strategy in turn:

Primary Prevention

- “Ensure there is a cross departmental focus on homelessness prevention in the Interdepartmental Homelessness Action Plan to address homelessness.” This is a

worthwhile goal. The Northern Ireland Audit Office report on Homelessness in 2017 outlined that “Until homelessness is a strategic priority for all the relevant departments and agencies in Northern Ireland it will continue to be viewed mainly as a housing issue and suffer because of conflicting priorities.”⁷ This goal needs to be a key way to ensure that homelessness is a strategic priority across government in Northern Ireland. Members of our Public Policy Forum and RSUN service users stressed that prevention cannot fall solely to the housing and homelessness sectors but must go wider. The IDHAP has an important part to play in this. It is imperative that cross-departmental and inter-agency working continues to develop during the life of this strategy. Ultimately, as the Campbell Tickell researchers put it, “The agency with statutory responsibility for preventing homelessness can initiate system-change and provide a co-ordinating function, but they cannot prevent homelessness without the contributions of others.”⁸ The response to the Covid pandemic illustrated that effective cross-departmental and inter-agency working is possible. It would be tragic if this is allowed to atrophy during the life of this strategy.

- “Raise homelessness awareness through programmes which are co-designed with those who have lived homelessness.” We would submit this action should be combined with the action in the SAPTA which states the following: “Deliver public awareness campaign to shift mind-sets towards and raise awareness of homelessness prevention.” One possible alternative would be as follows: “Deliver public awareness campaign co-designed with those with lived experience of homelessness to raise awareness of homelessness and the importance of homelessness prevention.” We welcome the emphasis in this document on the involvement of those with lived experience of homelessness. It is positive to see a recognition that “lived experience is a form of expertise which can complement professional expertise.”⁹ We believe the introduction of an effective and meaningful process of co-design will lead to better outcomes. As Mullins et al put it, “co-design recognizes that ‘different perspectives and a productive combination of different perspectives’ are needed to understand the needs of users and develop successful services.”¹⁰ It is recognised that practical challenges arise over this action. We would welcome the opportunity to work with the Housing Executive in the development of this aspect of the strategy.
- “Improve housing options to help people stay in their homes or find suitable accommodation before any homeless crisis.” We would welcome further clarification on this action in terms of the meaning of the phrase “improve housing options.”

Secondary Prevention

- “Extend the Prevention Fund in terms of seeking to mainstream key projects which best deliver homelessness prevention outcomes.” The Homelessness Prevention Fund has been a positive innovation. During our engagement with Public Policy Forum members, several participants noted some good outcomes arising from funding provided. However, our members would regularly point to the difficulty with the fund being the fact that the funding is only granted on a one-year basis. Indeed, on p28 of the draft strategy one of the key messages is set out as follows: “While prevention funding is welcomed it can be very difficult to strategically set up services when the opportunities for additional funding is provided at short notice with very specific parameters.” We know that the Housing Executive is aware of this issue and would prefer to offer the funding on a longer-term basis. If a multi-year budget is passed by the Northern Ireland Executive, funding should be allocated on a longer-term basis. We would further welcome clarity as to what would constitute success for the prevention fund and how the Housing Executive defines “homelessness prevention outcomes.” We would infer that this would be measured

against the recently adopted P1E definition of homelessness prevention, but this is not stated here.

- “Develop new preventative pathways for the groups at highest risk of rough sleeping and homelessness.” This again is a worthwhile goal. Our preference would be for a specific goal to be set out for those at risk of rough sleeping rather than combining this group with the wider group who are at risk of homelessness. The needs of those who experience chronic homelessness in the form of rough sleeping can be more intensive and there is a risk with how this goal is worded of that group being lost in the wider conversation about the bigger group who are at risk of homelessness. A further noteworthy point regarding this action which was raised by our Public Policy Forum members is that on occasion staff working for service providers outside of the homelessness sector (say in education or family support) sometimes do not know who to speak to if they believe a household is at risk of homelessness to see if support is available. In developing preventative pathways, this should be borne in mind.
- “Develop preventative services to respond to the most common reasons people present as homeless before they lead to homelessness.” This is a welcome action. We would welcome more detail on what is envisaged here. We further note that it is evident that the issues involved here would go far beyond the remit of the Housing Executive to touch areas such as family and relationship breakdown and domestic abuse. Addressing these issues should be a part of the Interdepartmental Homelessness Action Plan process.
- “Target those groups most impacted by COVID-19 or address issues exacerbated by the pandemic which increase the risk of homelessness.” We would submit that it would be helpful if this goal could be reworded for the purposes of clarity. It is right to acknowledge that some have been impacted by Covid-19 more than others and to target support to those most impacted. However, it is not straightforward to work out who has been impacted the most due to the variety of ways COVID-19 has impacted on our lives. Some have caught COVID-19 and suffered detrimental health impacts. Others have suffered economically, perhaps losing a job. For the purposes of this goal, we would ask for further clarification on how the Housing Executive will determine who the “groups most impacted by COVID-19” are.

Tertiary Prevention

- “Increase the focus on sustaining tenancies ensuring that support is available for those who need it both in the social and private rented sectors.” Tenancy sustainment is a crucial goal and we welcome the emphasis on the need for it in both the social and private rented sectors. We would submit it should be stated how success under this goal how it would be measured.
- “Implement measures to ensure people exit homelessness as quickly as possible with the right support.” We wholeheartedly agree about the importance of this goal. We would submit, however, that it may be better suited to Objective 3 rather than Objective 1 unless this action is envisaged to be about preventing repeat homelessness. If this is the case, it should be made clear.

In terms of potential omissions from the list of goals, we would highlight four. Firstly, the lack of any specific mention of measures to assist households at risk of homelessness to access the PRS. It could be argued that such measures would fall under the rubric of one of the wider goals above. However, there is no specific mention of these kind of measures which may be something the Housing Executive would like to remedy in the final strategy.

Secondly, under the Primary Prevention actions, we would recommend consideration be given to inclusion of an action focused on homelessness prevention early in the lives of children and young people. In the Housing Executive's research on Homelessness Service User Journeys published in March of this year, one of the striking findings reported was as follows: "The study highlighted just how early the triggers that eventually lead to homelessness start in a family and an individual's life." The report goes on to recommend that "The Homelessness Strategy should reflect this by calling other relevant Departments and community-based service delivery to understand and respond to the work that can be done at an early stage in individual and family life e.g. health visitors, GPs, educationalists including Early Years provision. Certain areas should be embedded into the curriculum and education delivery including information about making housing and financial choices, as well as learning how to budget, plan ahead, set up a home, learn to cook etc."¹¹

We agree with this recommendation and submit the Housing Executive should seek to implement it in the final Homelessness Strategy document.¹² The remit of the actions recommended here goes beyond the Housing Executive, but it should be considered under the ambit of the Interdepartmental Homelessness Action Plan.

Thirdly, we believe that Housing Supply should also be viewed as a key primary prevention measure. This quotation from Nicolas Pleace succinctly summarises why we make this suggestion: "preventing homelessness requires housing and no amount of preventative activity, no matter how well designed and delivered, can stop homelessness if there are not enough homes for people to live in."¹³ We understand that Housing Supply is considered under objective three of the strategy. We believe that an additional bullet point should be added in to refer to housing supply on p30 of the strategy with a mention of the fact that it will be considered in greater detail under objective three.

Fourthly, we submit that legislative reform should be added as an action under Primary Prevention. In our recently published manifesto for the 2022 Assembly election, we stated the following:

"The main legislation governing homelessness in this jurisdiction needs fundamentally reviewed. The Housing (NI) Order 1988 sets out the duties and obligations of the Housing Executive towards people who become homeless or are threatened with homelessness. In neighbouring jurisdictions, there has been substantial and progressive changes to similar legislation as well as the introduction of new legislation. For example, in England and Wales the law has changed to have more emphasis on reducing and preventing homelessness and in Scotland the distinction between 'priority' and 'non-priority' need has been removed. While legislative reform alone will not solve our homelessness crisis, it can provide better legal protection for those experiencing homelessness and ultimately lead to better outcomes.

One crucial measure that would need to be included is a statutory duty to require Executive Departments to work together. Unfortunately, siloed thinking and ways of working within government departments have had a negative impact on homelessness. However, the Covid pandemic has illustrated the difference effective interdepartmental working can make. A legal duty to work together would have a positive impact on homelessness service users and service providers. It could help pave the way for more joint commissioning of services to achieve shared goals and to better meet people's needs."

If this society is to shift the emphasis from reacting to homelessness when it happens to preventing it in the first place, the legislation in place needs to assist in that process. Currently,

our legislative framework is not helping in this regard. The fact that Northern Ireland has not reformed its legislation as yet does mean that we can learn from the experiences of other jurisdictions on these islands and beyond on what the best legislative framework for preventing and reducing homelessness is. Substantive progressive legislative change could help to improve our societies response to homelessness.

It is acknowledged that it is not for the Housing Executive to reform legislation. However, the Housing Executive has a key role alongside the homelessness sector in pushing for much needed reform. Consequently, we believe an action should be incorporated in this regard.

A	What priority actions do you feel should be considered for objective 1 in the Year 1 Action Plan?
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We submit that there are three actions which should be considered as a priority for Year 1 of the Action Plan.

1. Legislative Reform. We submit the Housing Executive should press the Northern Ireland Executive and the Assembly to reform the legislation governing homelessness here. The Housing Executive should begin preparations in advance of legislation being introduced to ensure that the organisation is ready to implement reforms.
2. Evaluating what works. We believe a detailed evaluation of homelessness prevention measures should be conducted in year one of the life of the Homelessness Strategy. This should be conducted in conjunction with the homelessness sector here.
3. Learning from other jurisdictions. We believe the Housing Executive should in year one of the action plan consider homelessness prevention measures in other jurisdictions and how they are evaluated.

6	Do you agree with objective 2 - 'Address homelessness by providing secure, appropriate accommodation and support?'	YES	NO
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In our estimation, objective two should be focused on how the Housing Executive and its partners respond to an individual or family who present as homeless and who need temporary accommodation. The current wording of the objective is ambiguous in terms of what the focus of this objective should be and overlaps with Objective 1 and 3.

It is unclear as to whether this objective is focused on temporary accommodation; other forms of housing solution (including secure tenancies); or both. Following the logic of the draft strategy, in our estimation the focus of objective two should be on temporary accommodation and the wording should reflect that. The wording consequently should be 'Address homelessness by providing secure, appropriate temporary accommodation and support.' Measures to support those who do not need temporary accommodation should fall under either Objective 1 or Objective 3.

This objective and the actions which flow from it should then be closely tied to the SAPTA. Some of the actions included in the Homelessness Strategy are duplicated in the SAPTA which may lead to unnecessary confusion. In our view, this section should simply state that the Housing Executive will seek to implement the SAPTA. The actions in the strategy which are not currently included should be added to the SAPTA.

We would also submit some of the actions in this section are either preventative in nature or relating to support for households to exit homelessness and should therefore be outlined under the first and third objectives rather than under this objective.

It should be stressed that, as will be evident from our answer to Q7, we are supportive of the actions set out in this section and the intention behind them. We are merely suggesting that they would sit better in other sections of the two documents.

7	<p>Do you agree with the focus outlined in objective 2 that will guide the Year 1 Action Plan? The draft Strategy outlines that actions identified in each year’s Annual Plan throughout the lifespan of the Strategy will focus on the following:</p> <ul style="list-style-type: none"> • Understanding the needs of our customers • Improving Access & Inclusion • Flexible and responsive accommodation & support services at the point of need • Implementing ‘Homeless to Home’, Strategic Action Plan for Temporary Accommodation <p>These areas are further outlined on pages 37 to 39 of the draft Strategy.</p>	<p>YES</p> <p><input type="radio"/></p>	<p>NO</p> <p><input checked="" type="radio"/></p>
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In line with our response to Q 6, below we will outline where each of the actions outlined in the current draft strategy should be reallocated under objective 1, 3 or in the SAPTA.

Understanding our customers’ needs

- “Extend and further develop the use of collaborative arrangements in service delivery including common assessment tools, case management, systems for sharing information, matching customers to services, as well as client tracking.” We believe this action should be incorporated in to the SAPTA under the second criteria for success.
- “Ensure arrangements are in place through which we will listen and respond to people with lived experience of homelessness in the design and delivery of services.” We strongly welcome this action. We believe that this action should be incorporated in to the SAPTA as well as under objectives 1 and 3 of the Strategy. The development of the service user voice is crucial. We would welcome further conversations with the Housing Executive to discern how it will ensure the engagement is substantive, meaningful and properly funded. It should be noted that if this service user involvement is not conducted properly, it may have counterproductive effects. As academic Mark Evans puts it, “the success of co-design is all in the doing. Done badly it can exacerbate social exclusion and destroy trust systems; done well it can help stabilize turbulent lives, improve life chances and foster trust systems.”¹⁴
- At the event run by RSUN which was facilitated by Homeless Connect with service users, it was made clear that it is imperative that the service user involvement is meaningful and not tokenistic. Service users need to play a leading role in the development of these ‘arrangements’ and that flexibility around how this will precisely work will be important.
- It should also be noted that an aspect of the development of these arrangements could involve the development of a peer support service. In the final Chronic Homelessness Action Plan for 2019-2022, one of the actions put forward was to “Encourage the development of peer support to help chronic homeless.” This action was included as part of Objective 4 of the Action Plan and admittedly it was stated that it would only be taken forward if more resources were available.¹⁵ This action, however, is not included in the draft Homelessness Strategy for 2022-2027. We believe there is a convincing case for the

Housing Executive to consider the development of a peer support service alongside the structure used for co-design with service users. This would potentially strengthen this and allow for the development of support networks to prevent and ameliorate homelessness. Part of our RSUN project involves peer support for those who are using or have used substances. There is some overlap between this group and those experiencing chronic homelessness. We would submit there is valuable learning available from the experience of RSUN on how this could be achieved.¹⁶

- “Develop arrangements to regularly collect, analyse and interpret information on homeless trends.” This action should be considered within the strategic plan for temporary accommodation and/or under objective 3. Accurate and comprehensive data collection and analysis is valuable in terms of understanding the issues we face in this society around homelessness and in the development of services to respond to it. In so far as this action would help to deliver this response, it is to be welcomed. Greater detail on what these arrangements would be and who would be involved would be appreciated.
- “Consider the most effective arrangements for the future commissioning and reconfiguration of services.” Arguably this action should be considered for services provided under objectives 1 and 3 as well as in the SAPTA. It would be helpful if greater detail could be incorporated around what this would precisely involve.

Improving Access & Inclusion:

- “Consider the mechanisms to introduce a central access point for homeless services.” In our estimation, this action should be incorporated under criteria two in the SAPTA. We strongly support the development of a central access point for homelessness services. We believe the Housing Executive should consider going further in this action point in not merely considering the mechanisms to introduce a central access point but actually committing to introduce such an access point by 2027 if not before. This issue has been on the agenda for many years, and the nettle needs to be grasped. At our consultation event with our Public Policy Forum, strong support for the introduction of a Central Access Point was expressed. Admittedly, there are practical challenges around introducing a central access point. These challenges are not insurmountable and other jurisdictions have managed to introduce such an access point. However, we are concerned that if there is not a firm commitment to introduce such a measure, that it will not be introduced in practice.
- “Identify actions to ensure accommodation and support services are available and accessible. We want to ensure that everyone is able to access homeless services in a way that fits with their needs.” This action should be incorporated under the second criteria for success outlined in the SAPTA. In principle, this is an action which everyone will agree with. However, the crucial point is how it is operationalised. We look forward to engaging with the Housing Executive in delivering on this objective.
- “Consider the mechanisms whereby we can reduce inequalities and disruptions to accessing statutory services, community resources or other support that might be needed for people who are homeless and/or living in temporary accommodation.” This action should be incorporated under the second criteria for success in the SAPTA. It is a welcome and necessary action. Achieving this goal would require partnership working with statutory services and community organisations. Unfortunately, at the time of writing, this can be highly variable depending on the sector concerned and the specific service involved.

Flexible and responsive accommodation & support services at the point of need

- “Work with our sectoral partners and commissioners towards closing the gap between need and supply for homeless services ensuring there is a continuum of accommodation and support options to meet need”. This action is already mostly incorporated in to the actions set out under the second criteria for success in the draft SAPTA. It may be that some of the language needs to be revised to capture all aspects of this action.
- “Continue to implement the identified priorities in the Housing Executive’s Reset Plan to minimise the long-term impacts of COVID-19.” This action should be incorporated in to the SAPTA in so far as it refers to temporary accommodation. Other aspects related to homelessness prevention or exiting homelessness should be considered under objectives 1 or 3.
- “Continue to identify and test new models for service delivery to address identified needs and deliver better outcomes for customers including more flexible housing.” This action is at least partially incorporated under the second criteria for success in the draft SAPTA. It may be that one of the actions set out there could be revised to incorporate the fullness of this action. In so far as it refers to exiting homelessness, it should be incorporated under Objective 3.
- “Support frontline staff in their work with people experiencing homelessness – this will include those providing the Housing Executive’s statutory services and those in the wider homeless sector.” This should be incorporated in to the SAPTA and under Objective 3 of the Strategy. We strongly welcome the inclusion of this as an action. The sector is under enormous pressure at the current time. The difficulties being experienced have been exacerbated by the ongoing Covid pandemic. In recent years, there has been an increase in the numbers of individuals experiencing homelessness who have complex needs. As the Supporting People Needs Assessment notes: “service user needs have changed over the last five years becoming increasingly complex... the needs of service users have become more complex with addiction and mental health.”¹⁷ Unfortunately, staff pay and conditions in the sector have not been able to keep up with what is available in other sectors, putting more and more pressure on providers who are struggling to recruit and retain staff.¹⁸ Providers of temporary accommodation at our consultation event pointed to the real challenges this situation has caused with increased levels of stress and burnout amongst staff. We believe the Northern Ireland Frontline Network which Homeless Connect facilitates could play a valuable role in fulfilling this goal. We would welcome the opportunity to work with the Housing Executive to provide effective support to frontline staff.¹⁹
- “Consider mechanisms to reduce reliance on non-standard accommodation (hotels and bed and breakfast facilities) and introduce arrangements to ensure families with children are not placed in this type of temporary accommodation.” This action is already considered under the second criteria for success in the draft SAPTA. It may be that the language used needs to be revised to capture the fullness of the action set out here, but in our view this action belongs in the SAPTA. We strongly support efforts to reduce the reliance on non-standard accommodation for those experiencing homelessness. Often this accommodation is inappropriate for those with complex needs and can see individuals left without support they need. In an ideal world, no person or family would have to be allocated to non-standard accommodation. It is accepted though that this is not the world we are currently in so efforts may be necessary to prioritise ensuring families with children are not accommodated in such an environment.
- “Explore alternative routes with the Department for Communities and the Department of Health through which to provide accommodation and support to people with no recourse to public funds when the current arrangements as part of the COVID-19 response end.” This action should be incorporated under criteria two of the draft SAPTA which mentions

the 'Everyone In' Scheme. We warmly welcome this action. It would be submitted that civil society organisations should be included alongside the departments concerned; that an explanation as to what the term "no recourse to public funds" means should be provided, as while those of us who are working in the sector may understand this concept and what it means, many do not; and that a specific action which would be helpful regarding individuals with NRPF status would be the development of anonymised data collection on the number of individuals who are impacted. At the current time, it is difficult to be certain how many individuals are in this situation in this society. As the cliché puts it, 'what is counted is what counts.'

- "Use digital solutions to develop and deliver innovative and flexible services and processes including development of assessment and access IT solutions." In so far as this refers to temporary accommodation, it should be incorporated in to the SAPTA.

Implementing the SAPTA

- "Implement the recommendations of the Action Plan" and "Review Action Plan reflecting on experiential evidence, emerging pressures and priorities." We believe these actions should be the only ones considered under Objective Two of the Strategy.

A What priority actions do you feel should be considered for objective 2 in the Year 1 Action Plan?

The priority action for the Strategy should be to implement the actions for Year 1 of the SAPTA.

8	Do you agree with objective 3 - 'Support customers exiting homelessness into settled accommodation'?	YES	NO
	<p>We agree that this is a suitable high-level objective for the Homelessness Strategy. For some people who have experienced homelessness, sustaining a tenancy once they are offered a long-term home can be a challenge. It is imperative that the right support is given at the right time to assist households seeking to leave homelessness.</p> <p>We have two comments to make on the wording adopted here. In contrast to Objective two, the language used here is "settled accommodation". We are not opposed to this wording. However, in Objective Two the language used is that of "secure" accommodation. We are not sure of what the rationale is for the difference. There may be a strong argument for the use of these different terms. However, if there is not, we would submit there should be consistency in the language used.</p> <p>Secondly, following a session with service users with lived experience of homelessness held with RSUN, we would highlight the importance of taking care with the language of "exiting" homelessness. For some of the service users who participated in the consultation event, the language of 'exiting' is too black and white for the reality of what leaving homelessness is like. Used improperly, it can give the impression that those who have exited homelessness have everything sorted when the reality can be much more complex and challenging. Further reflection on this language with service users would be worthwhile.</p>	<input checked="" type="radio"/>	<input type="radio"/>

9	Do you agree with the focus outlined in objective 3 that will guide the Year 1 Action Plan? The draft Strategy outlines that actions identified in each	YES	NO
		<input checked="" type="radio"/>	<input type="radio"/>

<p>year's Annual Plan throughout the lifespan of the Strategy will focus on the following:</p> <ul style="list-style-type: none"> • Housing Supply • Support • Community Integration <p>These areas are further outlined on pages 47 to 48 of the draft Strategy.</p>		
<p>We have some concerns about the narrative introducing Objective three. It is pertinent to highlight two in particular:</p> <ol style="list-style-type: none"> 1. The opening narrative includes discussion of provision of temporary accommodation. In our view, the supply of temporary accommodation should not be included within the ambit of Objective Three of the strategy. Provision of temporary accommodation is for those who have been legally found to be homeless and is not about exiting homelessness. References to this should be removed. We submit that the provision of temporary accommodation should be considered in the SAPTA, not under Objective Three. 2. On p40, the following paragraph is included: "We want to see a significant shift towards rapid rehousing including Housing First for those it is appropriate for. It provides ordinary, settled housing as a first response for people with multiple needs, i.e. those who are chronically homeless." There are a number of difficulties with this paragraph. Firstly, it is unclear whether the sentence "it provides ordinary, settled housing as a first response for people with multiple needs" is a description of Housing First or a description of Rapid Rehousing. Either way, the definition here does not provide a solid definition of either concept and we would submit the Housing Executive utilise clear and accurate definitions of both terms in the final Strategy.²⁰ Thirdly, the description outlined here includes the provision of "ordinary" housing. We do not know what this adjective is included for. We would submit this paragraph should be rewritten. <p>Taking the four criteria for success in turn:</p> <ul style="list-style-type: none"> • "Significant shift to rapid rehousing" - We warmly welcome this criterion. We do, however, believe that in the final strategy document a clear definition of the term "rapid rehousing" should be provided.²¹ It is crucial this term is defined in the final strategy document as it is not self-evident. • "Support is tailored to suit individual need, both in the immediate and longer term" - this is a helpful criterion for success. We would ask for detail on how success would be measured against it. • "A range of housing options to meet the needs of those exiting homelessness." This is a solid criterion of success. We would value clarity on how the Housing Executive would measure success against this criterion. • "Sustained tenancies within enabled communities." Again, we welcome this criterion. It would be helpful to know what the Housing Executive means by the term "enabled communities." <p>Turning to the actions to deliver the aim:</p> <p>Housing Supply</p> <p>We welcome the inclusion of a section on Housing Supply. Although this is primarily the responsibility of the Department for Communities, it is right for the Housing Executive to acknowledge their role in this area. Increasing the level of Housing Supply is crucial if we are ever to see an end to homelessness here.</p>		

Members of our Public Policy Forum stressed the importance of increasing the supply of safe, secure and affordable housing in terms of assisting in their response to homelessness. Temporary accommodation providers who are a part of the forum pointed out that a lack of housing supply can lead households in temporary accommodation who are ready to move on to effectively get stuck in the temporary accommodation system. This situation can arise because these households have no viable housing option to move on to. This can pose an array of challenges to temporary accommodation providers. It can also lead to households who would benefit from the support that can be provided in temporary accommodation being unable to access it.

It should be noted that as with our comments on Objective 2, we do not believe references to supply of temporary accommodation (as opposed to the supply of permanent housing) should be incorporated in this section. This should be considered in the SAPTA.

- “Deliver the SAPTA to improve temporary accommodation options.” We believe this should be removed from this section for the reasons outlined previously.
- “Consider a range of measures and delivery to expand housing options across all tenures.” We agree with this action in so far as we welcome the expansion of housing options across all tenures. Further detail on the meaning of this action would be appreciated.
- “Extend Housing First provision in Northern Ireland on a cross tenure basis with a focus on improving access to permanent housing for these customers.” We strongly support the extension of the use of the Housing First model for the cohort of individuals experiencing chronic homelessness. We believe Housing First has a strong international evidence base to support its effectiveness in supporting those experiencing chronic homelessness.²² We welcome the emphasis the Housing Executive give to the expansion of Housing First. However, we have some questions about the wording utilised here. Why has the term “cross tenure” been included in this action and what is meant by “permanent housing”? Greater detail would help to avoid confusion in this area.
- We also note that the SAPTA includes the following action under its first indicator for success: “Continue to build Housing First services across Northern Ireland by offering Housing Executive Housing First tenancies.” However, we are not sure how these two actions precisely relate to each other. One calls for an extension of Housing First provision on a “cross tenure” basis while the other points to an expansion of Housing First through provision of Housing Executive Housing First tenancies. We would suggest these two actions be combined and reworded to provide clarity on how this will be done. As Pleace et al note, “International research shows that there is a need for Housing First programmes to have enough resources and reliable funding to ensure programme fidelity and growth. The lack of adequate funding for the development of Housing First programmes may constitute a significant barrier to their implementation and sustainability, with potential negative impacts on fidelity and growth.”²³ If the Housing Executive is going to go down the path of seeking to expand Housing First provision, as we think it should, it is imperative that it is properly funded.
- “Contribute to the delivery of the Department for Communities Housing Supply Strategy.” This is a positive action to include and shows the Housing Executive’s desire to work in partnership with the Department of Communities.

Support

- “Implement mechanisms to ensure people exit homelessness as soon as possible with the right support.” We agree with this action but would urge the Housing Executive to provide more detail on what these “mechanisms.”

- “Deliver the Chronic Homeless Action Plan reflecting on the lessons learned both from the Strategic Review of Temporary Accommodation and the COVID-19 Homelessness Response.” We do not believe this action should be included since the Chronic Homelessness Action Plan was due to run for three years from April 2019 to March 2022 and will be finished before the Homelessness Strategy comes in to operation.²⁴ It had been our understanding that the Chronic Homeless Action Plan (CHAP) would be rolled in to the Homelessness Strategy going forward. If the intention is to continue actions outlined in the CHAP, a different way of phrasing this action would provide greater clarity.
- “Evaluate and extend the Complex Lives approach in Northern Ireland.” We strongly welcome the inclusion of this action. The introduction of the ‘Complex Lives’ approach shows significant potential in Belfast for helping statutory agencies and homelessness services work together to better support those experiencing chronic homelessness. The support of this approach provides an excellent example of the Housing Executive listening to research findings and responding.²⁵ We have engaged with those involved in introducing the scheme here and commend them for their work thus far. It is appropriate to evaluate how it has worked and whether it can or should be extended to other parts of Northern Ireland. We would submit though that before committing to extending the use of the Complex Lives approach, it would be appropriate to conduct an evaluation. The way this action is currently worded implies that Complex Lives should be extended regardless of what an evaluation may say. We note that in the SAPTA, one of the actions included states the following: “Mainstream the collaborative case management approach developed through the Belfast Complex Lives project, subject to successful evaluation of pilot project.” We believe this wording should be included in the final Homelessness Strategy and that this action should then be removed from the SAPTA as it is not specifically connected to temporary accommodation.
- “Introduce flexible housing support options in terms of support intensity, duration and location which are responsive to needs and include a focus on transition periods (e.g. leaving care, hospital, prison) and using critical time intervention models in order to prevent homelessness; this should include appropriate protocols and joint working arrangements.” We strongly welcome the content of this action. Many organisations represented on our Public Policy Forum are floating support providers. At our consultation event, it was noted that demand for floating support is very high and that in some cases services feel unable to advertise the services they provide more widely due to the fact that they would be overwhelmed by the level of demand. Providers noted that flexibility in provision of floating support is important so that a person-centred, tailored approach can be adopted for those they are working with. It should also be noted that both providers and service users outlined at our consultation events that arbitrary cut-off points for the provision of support are unhelpful. While it is accepted that resources are limited, there must be an understanding that in some cases more long-term support will be necessary. The language used in this action is encouraging in this regard.
- “Increase the focus on sustaining tenancies ensuring that support is available for those who need it both in the social and private sectors.” We fully agree that support for tenancy sustainment is crucial in both the social and private sectors.

Community Integration

- “Utilise our existing tenant and community involvement structures to consider the range of factors which impact on tenancy sustainment from a community perspective and explore community-based models to prevent repeat homelessness.” This is a welcome action. We would submit that the Housing Executive in this strategy should commit to creating a new forum for service users who have lived experience of homelessness (or are

currently experiencing homelessness) and that this group should be included in this discussion.

- “Provide support including funding to community groups to raise awareness of issues facing those exiting homelessness and consider actions which provide community support to sustainment.” We welcome this action but would ask for greater detail on what is envisaged. Raising awareness of homelessness in this society is important. When it is outlined that “support including funding” will be provided, it would be helpful to know more about what this involves and what level of funding would be provided.
- We note that the SAPTA currently includes actions in this area. We submit that they should be removed from the SAPTA and combined with the two actions set out here.

We would highlight four points which are missing from the actions included here. The first is reference to support for Homelessness Awareness Week. The Housing Executive does provide support for this week in practice, but it would be helpful for an additional action to be included specifically referring to it. This could be as simple as stating “Support and promote Northern Ireland’s Homelessness Awareness Week.”

Secondly, we note that there is no mention of programmes to provide basic household goods and furniture to assist in sustaining tenancies. We know from experience how valuable the provision of a starter pack can be in terms of assisting tenancy sustainment.²⁶ Support for these schemes focused on tenancy sustainment should be explicitly mentioned as an action in the strategy.

Thirdly, we note that on p23 of the draft strategy reference is made to “a need for this strategy to engage with the business sector in assisting those households who are homeless or threatened with homelessness.” We welcome the inclusion of this section of the strategy. However, we would highlight that none of the actions in the strategy explicitly mention the involvement of the business sector. In the final strategy, we would ask for an explicit mention of the involvement of the business sector in at least one of the actions included.

Fourthly, we note the absence of any reference to the Fundamental Review of Social Housing Allocations.²⁷ In our view, reference to the implementation of this review needs to be included in this section of the strategy considering the clear and obvious impact reforms to the system will have on those at risk of or experiencing homelessness. As the Housing Executive is a central actor in this area, actions related to this issue should be included in the final strategy.²⁸

A	What priority actions do you feel should be considered for objective 3 in the Year 1 Action Plan?
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We would highlight two actions which should especially be high on the agenda for year 1 of the Action Plan: the extension of Housing First and the evaluation of ‘Complex Lives’.

10	Do you agree with the enablers that are outlined in the draft Strategy?	YES	NO
A	Experiential Evidence	<input checked="" type="radio"/>	<input type="radio"/>
B	Collaboration	<input checked="" type="radio"/>	<input type="radio"/>

C	Legislation	<input checked="" type="radio"/>	<input type="radio"/>
D	Interdepartmental Approach	<input checked="" type="radio"/>	<input type="radio"/>
E	Funding	<input checked="" type="radio"/>	<input type="radio"/>
F	Staff	<input checked="" type="radio"/>	<input type="radio"/>
G	Process	<input checked="" type="radio"/>	<input type="radio"/>

In our view, these are the right enablers and reflect the hard work of Housing Executive staff in the pre-consultation process. These have been well thought through. We particularly commend the ongoing and clear commitment of the Housing Executive to collaborative working and the desire to “work towards co-design of relevant services.”

Regarding the funding enabler, we recognise that the timing of the development of this strategy made it impossible for the Housing Executive to provide detail on the funding since the multi-year budget for 2022-2025 was still in development when the draft strategy was written. Ideally, greater financial information would be available in advance of the development of future homelessness strategies.

H	What would you want to see prioritised in the Year 1 Action plan in terms of enablers?
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In our estimation, the top priority early in the next Assembly mandate is reform of the legislation governing homelessness. We have discussed this in answer to Q5.

11. Please provide any other comments which should be considered in the development and delivery of the Homelessness Strategy 2022-27
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We have seven additional comments to make on the content of the strategy.

1. We would like to commend staff at the Housing Executive for the widespread pre-consultation they engaged in on this draft strategy. It is evident in reading the strategy that the Housing Executive has in many ways listened to stakeholders and it is important to acknowledge the diligent work of the officials involved. Homeless Connect welcomes the openness of Housing Executive staff in the development of the strategy which is a model for other statutory agencies to follow. We particularly commend the willingness of the Housing Executive to commit to increasing the involvement of service users and the honest reflections about past strategies in this regard.
2. A general comment we would highlight regarding the strategy as a whole is the lack of any noticeable reference to a gendered analysis of homelessness. On p42 of the draft strategy, reference is given to the excellent research produced for the Housing Executive on the impacts of Chronic Homelessness on Women.²⁹ However, while reference is made to this report, on the face of the strategy its recommendations do not appear to be included in the draft document. It may be that the Housing Executive plans to consider some of these recommendations under actions outlined throughout the strategy. However, we believe it would be valuable for the final document to explicitly refer to how it will respond to the issues raised in the report ‘the impacts of Chronic Homelessness on Women.’ The report comments that “it is abundantly clear that more needs to be done to strategically develop relevant and appropriate services for chronic homeless women, both

in Belfast and throughout Northern Ireland.”³⁰ We hope the final strategy will help to strategically develop relevant and appropriate services for this group.

3. It is notable that the draft Homelessness Strategy does not at any point mention the 2021-2031 Substance Use Strategy. In the interests of promoting joined up working between relevant departments, it would seem appropriate to consider how this strategy can marry up with the ten-year Substance Use Strategy.³¹ It is noted that the Substance Use Strategy speaks of the development of the ‘Complex Lives’ project in Belfast.
4. On p15, we highlight the last sentence: “It is acknowledged that there may be increased demand arising from households arriving to Northern Ireland e.g. cases seeking asylum.” This last phrase “cases seeking asylum” should be amended in the final version. Individuals seeking asylum should not be described as “cases”. They are persons with dignity and worth. This should probably read “e.g. individuals seeking asylum.”
5. On p29, the phrases “Housing Led” and “Housing First” are introduced. No definition of the terms is provided at this point. On p44 a helpful definition of “Housing First” is provided. It may be helpful to include a reference to the definition there when the term is first used in the document. The term “Housing Led” is expanded on at p39. However, the description provided at that point could arguably be applied to “Housing First” and a reader who is unaware of these concepts may find it hard to understand what the difference is between them. It would be helpful if the Housing Executive could provide a clear definition, perhaps through a citation, as to what it means when it mentions “Housing Led” approaches.
6. On p42, it is stated that “Research indicates that the longer an individual or household is homeless, the greater the impact on their health and well-being.” Whilst this is true, the draft strategy does not point to what research this is. It would be good practice for a citation to be included to this effect.³²
7. On p52, it is stated that “The Housing Executive will continue to align with the Programme for Government.” In this section reference is made to the “Programme for Government 2016-2021.” No such programme in fact exists. A draft Programme was published and consulted on, but no Programme has been agreed by the Northern Ireland Executive. At the time the final strategy is released, such a Programme may have been agreed and it must be hoped that if no such Programme is agreed in this mandate that one will be agreed on in the next one. This paragraph needs to be rephrased to ensure it matches the factual situation pertaining to the Programme for Government.

12. Please provide comments on how the Homelessness Strategy 2022-27 should be monitored and reported against:

It is acknowledged that effective monitoring and reporting is of major importance. We agree with the structure of Annual Action Plans, quarterly reports to implementation structures and the publishing of an Annual Progress Report.

One area which we believe needs greater consideration is how to involve elected representatives in monitoring the implementation of the Homelessness Strategy and the SAPTA. At the current time, the Communities Committee is the body tasked with scrutinising the work of the Housing Executive and the Department of Communities in terms of homelessness. While we acknowledge the excellent work the Committee does, ultimately it only has limited bandwidth and time to consider a wide range of different issues. Unlike Committees at Westminster, the Communities

Committee also has a role in scrutinising legislation which rightly takes considerable time. There are only highly limited opportunities for the Committee to consider homelessness in depth.

In our view, there is a disconnect between political representatives and scrutiny of how the Housing Executive and Executive Departments respond to homelessness. This is not to suggest that elected representatives do not desire to prevent and reduce homelessness. In our experience, this is far from the case. However, we would submit at the current time the political structure does not exist to effectively scrutinise how the Housing Executive and the NI Executive respond to homelessness.

We would submit that consideration be given to inviting political parties represented in the multi-party Executive to nominate elected representatives to participate in a revised version of the Homelessness Strategy Steering Group. Ideally, these representatives would be Assembly members but it is appreciated that a degree of realism is needed about their ability to effectively participate. It is of note that in Scotland, the Homelessness Prevention and Strategy Group includes political representation from COSLA (the Scottish equivalent of NILGA) and the Minister responsible for homelessness policy.³³ It is of course appreciated that Northern Ireland is a different political context than Scotland and that this is not the only way more effective political engagement could be facilitated. However, we believe consideration should be given to resolving this issue.

We would also submit that the Chair of the HSSG should be held by someone independent, outside of the Executive Departments who make up the group (as is the case in Wales with their National Housing Advisory Board).³⁴

We would submit that consideration needs to be given to incorporating the voice of service users in to the monitoring process. It is accepted that this is not straightforward and we would welcome the opportunity to support the Housing Executive in facilitating this involvement. In our view, in line with the very welcome actions around service user involvement in both the SAPTA and the Homelessness strategy, it would be appropriate to consider how best to incorporate service user involvement.

Consideration of this should be an important aspect of the evaluation of the 2017 to 2022 Homelessness Strategy which is currently being conducted. We would value being aware of the evaluation's view on this issue before providing further comment.

References

¹ See Nicolas Pleace, "Preventing Homelessness: A Review of the International Evidence", (Dublin: Simon Communities of Ireland, 2019) 13-22 for a summary of the some of the impacts of homelessness on those who experience it.

² "In Finland, which has one of the most successfully integrated and demonstrably effective strategic responses to homelessness in the World, the roles of preventative, rapid rehousing and homelessness services are clearly demarcated within a cohesive approach. The evidence suggests that an effective Homelessness Strategy uses a triage system, in which a clearly defined set of preventative services is backed by a second rank of services that are there to deal with homelessness when it actually occurs, and can provide intensive supports when needed to potentially people who are homeless with high support needs." "Preventing Homelessness: A Review of the International Evidence, 30.

³ "Ending Homelessness Together: Draft Homelessness Strategy 2022-2027", Northern Ireland Housing Executive, 2 November 2021, <https://www.nihe.gov.uk/Documents/Consultation-Draft-Homelessness-Strategy-2022-27/Ending-Homelessness-Together-draft-strategy-2022-2.aspx>. All references to page numbers in this response refer to the page numbers in the draft strategy document.

⁴ Prevention Review Group, "Preventing Homelessness in Scotland", February, 2021

<https://www.crisis.org.uk/media/244558/preventing-homelessness-in-scotland.pdf> 43.

⁵ Volker Busch-Geertsema and Suzanne Fitzpatrick, "Effective homelessness prevention? Explaining reductions in homelessness in Germany and England", *European Journal of Homelessness*, 2, (2008) 73.

⁶ Fiona Boyle, "Homelessness Service User Journeys", *Housing Executive*, March 2021, <https://www.nihe.gov.uk/Documents/Research/Homelessness/Homelessness-Service-User-Journeys.aspx?ext=>. 115.

⁷ Northern Ireland Audit Office, "Homelessness in Northern Ireland", 21 November 2017,

https://www.niauditoffice.gov.uk/sites/niao/files/media-files/Homelessness%20in%20Northern%20Ireland%20Full%20Report_0.pdf 47.

⁸ See Nicola McCrudden, Mark Goldup, Tim Gray, John Palmer, Annie Field, Mia Rafalowicz-Campbell and Divya Krishnaswamy, "Strategic Review of Temporary Accommodation", October, 2020,

<https://www.nihe.gov.uk/Documents/Research/Homelessness/Strategic-Review-of-Temporary-Accommodation-2020.aspx?ext=> 179.

⁹ Robyn M. Mullins, Bridget E. Kelly, Patrick 'Spike' Chiappalone, Virginia J. Lewis, "'No-one has listened to anything I've got to say before': Co-design with people who are sleeping rough," *Health Expectations*, 2021; 24: 930.

¹⁰ Mullins et al, "Co-design with people who are sleeping rough", 931.

¹¹ "Homelessness Service User Journeys", 115.

¹² The evidence here is reflected in the findings of Sam Ross-Brown and Gerard Leavey in a recent paper published in the *European Journal of Homelessness* which sought to understand the pathways young adults took in to homelessness. In their interviews, a consistent theme was the impact of adverse early childhood experiences. See Sam Ross-Brown and Gerard Leavey, "Understanding Young Adults' Pathways Into Homelessness in Northern Ireland: A Relational Approach" *European Journal of Homelessness*, Volume 15, No. 2 2021,

https://www.feantsaresearch.org/public/user/Observatory/2021/EJH_15-2/EJH_15-2_A3.pdf

¹³ "Preventing Homelessness: A Review of the International Evidence", 65

¹⁴ Mark Evans, University of Canberra, 2015, quoted in Ingrid Burkett, "Working Together to Transform Outcomes in Social Services: An Introduction to Co-Design", <http://www.aodcollaborative.org.nz/vdb/document/98> 10.

¹⁵ Housing Executive, "Chronic Homelessness Action Plan," January 2020, <https://www.nihe.gov.uk/Documents/Chronic-homelessness/Chronic-Homelessness-Action-Plan.aspx> 40

¹⁶ Homeless Connect, "RSUN", accessed 23 November 2021, <https://homelessconnect.org/rsun/>

¹⁷ Department for Communities, "Supporting People Strategic Needs Assessment", November, 2020, 154.

¹⁸ "In Northern Ireland... Supporting People funding has remained ringfenced and has therefore been protected to some extent from the cuts which have been made by local authorities in England, in particular since that ringfence was removed. This is not, however, to say that Supporting People funding in Northern Ireland has not fallen in real terms. Core funding has remained static for the past 10 years. Although in some years this has been supplemented by additional discretionary funding, 2017/2018 research on cost pressures showed that over the previous nine years the capping of the Northern Ireland Supporting People core grant amounted to a real term cut of 27%." "Strategic Review of Temporary Accommodation", para 3.6.

¹⁹ "Frontline Network", Homeless Connect, accessed 16 November 2021, <https://homelessconnect.org/frontline/>

²⁰ In the same section of the Strategy, 'Housing First' is properly defined (p45) in case study two. Rapid Rehousing on the other hand has been defined by Byrne et al in the following way: "rapid rehousing (RRH) similarly aims to help households currently experiencing homelessness regain stable housing as quickly as possible. In contrast to the ongoing housing and service supports provided by HF, RRH focuses on stabilizing households experiencing housing crises by providing time-limited, yet highly flexible, forms of assistance (National Alliance to End Homelessness, 2016). Conceptually, RRH is perhaps best described using the concept of 'secondary prevention' from the field of public health: it seeks to reduce the impact and duration of homelessness by intervening and rehousing individuals quickly as possible after the onset of an episode of homelessness."

²¹ We note the Scottish Government defines this term in their "Ending Homelessness Together: High Level Action Plan" document. Scottish Government, "Ending Homelessness Together: High Level Action Plan", November 2018, accessed 13 January 2022, <https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2018/11/ending-homelessness-together-high-level-action-plan/documents/00543359-pdf/00543359-pdf/govscot%3Adocument/00543359.pdf>

²² "The international expansion of Housing First has been driven in no small part by a rigorous body of evidence, including experimental studies conducted in multiple countries, of the effectiveness of Housing First in reducing homelessness." Thomas Byrne, Minda Huang, Richard Nelson and Jack Tsai, "Rapid rehousing for persons experiencing homelessness: a systematic review of the evidence", *Housing Studies*, 29 March 2021, 2.

²³ Nicholas Pleace, Isabel Baptista and Marcus Knutagård, "Housing First in Europe: An Overview of Implementation, Strategy and Fidelity", *Housing First in Europe Hub*, October 2019,

https://housingfirsteurope.eu/assets/files/2019/10/2019-10-10-HFinEurope_Full-Report2019_final.pdf 44.

²⁴ Housing Executive, “Chronic Homelessness Action Plan”, May 2019, <https://www.nihe.gov.uk/Documents/Supporting-documents/RS-246-02-19-Chronic-Homelessness-Action-Plan-ACCE.aspx>, 2, “The Chronic Homelessness Action Plan will align with the Homelessness Strategy and covers a three-year period from April 2019 to March 2022.”

²⁵ “There is an opportunity for the Housing Executive to take the lead in working with other statutory organisations such as local authorities, the PHA, Health and Social Care Trusts and the criminal justice system to ensure that there is a joined up, targeted approach to supporting people experiencing chronic homelessness, following best practice models such as the MEAM approach in England which aims to develop effective, coordinated services that directly improve the lives of people facing multiple disadvantage.” 81. This was a recommendation in the report on the role of Day Services in delivering support to those experiencing Chronic Homelessness report.

²⁶ “Home Starter Pack”, Homeless Connect, accessed 17 November 2021, <https://homelessconnect.org/home-starter-packs/>.

²⁷ Department for Communities, “A Fundamental Review of Social Housing Allocations”, accessed 12 January, 2022, <https://www.communities-ni.gov.uk/consultations/fundamental-review-social-housing-allocations>

²⁸ See [AQW 27291/17-22](#), Andy Allen MLA, Answered on 11/01/2022, “To ask the Minister for Communities for an update on each strand of the housing statement made to the Assembly on 3 November 2020,” - “My Department has been working with the Housing Executive to enable the implementation of 18 of the 20 proposals set out in the December 2020 Consultation Outcome Report on “A Fundamental Review of Social Housing Allocations”. Further work will be carried out and alternatives considered for two proposals relating to intimidation points and interim accommodation points. Funding for 2021/22 has been secured and the Housing Executive’s project team has commenced the planning stage for implementation and delivery of the proposals. The intention is for implementation of Proposal 1 - Independent tenure-neutral advice service, Proposal 5 - A greater choice of areas for all applicants for a social home, Proposal 15 - An applicant may receive 2 reasonable offers of accommodation (currently 3) and Proposal 16 - Social landlords may withdraw an offer of accommodation in specified circumstances by March 2022.”

²⁹ Fiona Boyle, “The Impacts of Chronic Homelessness for Women,” Housing Executive, June 2021, <https://www.nihe.gov.uk/Documents/Research/Homelessness/Impacts-of-Chronic-Homelessness-for-Women.aspx?ext>.

³⁰ “The Impacts of Chronic Homelessness for Women,” 22.

³¹ Department of Health, “Preventing Harm, Empowering Recovery: A Strategic Framework to Tackle the Harm from Substance Use (2021-31)” <https://www.health-ni.gov.uk/sites/default/files/publications/health/doh-substanceuse-strategy-2021-31.pdf>

³² See for example Stacey Wilson, Andrea McCloughen, Jenny Parr and Debra Jackson, “If you are homeless you are welcome here”: Social obligations for the homeless and socially disadvantaged,” *Journal of Clinical Nursing*, 2019, 28:2721, Gill Leng, “The Impact of Homelessness on Health”, Local Government Association, September 2017, https://www.local.gov.uk/sites/default/files/documents/22.7%20HEALTH%20AND%20HOMELESSNESS_v08_WEB_0.PDF, and Jennifer Perry and Tom K J Craig, “Homelessness and mental health,” *Trends in Urology and Men’s Health*, March/April 2015.

³³ Scottish Government, “Homelessness Prevention and Strategy Group”, accessed 13 January 2022, <https://www.gov.scot/groups/homelessness-prevention-and-strategy-group/>

³⁴ Welsh Government, “Housing Support National Advisory Board”, accessed 13 January 2022, <https://gov.wales/housing-support-national-advisory-board>



Homeless Connect

Andras House | 60 Victoria Street Belfast | BT2 7BB

homelessconnect.org