



Submission

Draft Strategic Action Plan for Temporary Accommodation Consultation

January 2022

homelessconnect.org

Ending Homelessness Together

Homeless To Home

Draft Strategic Action Plan for Temporary Accommodation 2022-27



Consultation Response

Your Details				
Is this submission on behalf of an:	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 planning principles that will guide the delivery of the Action Plan?	YES	NO
A	Person Centred	<input checked="" type="radio"/>	<input type="radio"/>
B	Evidence Based Planning	<input checked="" type="radio"/>	<input type="radio"/>
C	Expert Led	<input checked="" type="radio"/>	<input type="radio"/>
D	Responsive	<input checked="" type="radio"/>	<input type="radio"/>
E	Partnership Working	<input checked="" type="radio"/>	<input type="radio"/>
F	Innovative	<input checked="" type="radio"/>	<input type="radio"/>
G	Value for Money	<input checked="" type="radio"/>	<input type="radio"/>
We agree with all seven of the principles outlined which are the same as those set out in the Draft Homelessness Strategy.			

2	Do you agree with the indicators of success identified in the Action Plan?	YES	NO
A	Minimised need for temporary accommodation	<input type="radio"/>	<input checked="" type="radio"/>
B	Customer receives appropriate accommodation and support at the point of need	<input checked="" type="radio"/>	<input type="radio"/>

C	Good quality, affordable accommodation which is safe, warm and well-managed	<input checked="" type="radio"/>	<input type="radio"/>
D	Customers moving on from temporary accommodation sustain their tenancies	<input checked="" type="radio"/>	<input type="radio"/>

We do not believe that indicator A should be included in the draft Strategic Action Plan for Temporary Accommodation (hereafter referred to as SAPTA). In our view, this objective is rightly considered under Objective 1 of the Homelessness Strategy and all references to preventing homelessness should be considered there rather than in the SAPTA. This would keep this action plan more focussed on the key issue of the provision of temporary accommodation when it is needed.

At the time of writing, demand for temporary accommodation continues to outstrip supply. The Covid 19 pandemic has exacerbated the trend of increased demand for temporary accommodation. As the draft SAPTA acknowledges, the Housing Executive has had to acquire additional single let and 'non-standard' accommodation capacity to respond to the level of demand for Temporary Accommodation. The Housing Executive have consistently and rightly acknowledged the long-term impact of the pandemic. As the draft Homelessness Strategy for 2022-2027 rightly states, "The full extent of the longer-term impacts of the pandemic remain to be seen however the Housing Executive expects that the impacts will be significant and long lasting. In addition both the environment we operate homeless services in and how these services are delivered will change permanently post COVID-19."¹

Considering the current situation, we would submit the SAPTA needs to be realistic about demand for temporary accommodation in coming years and the huge amount of pressure providers are under.

It should be stressed that we believe in measures which would reduce the number of households needing access to temporary accommodation. The emphasis on homelessness prevention is crucial and the homelessness strategy should emphasise and prioritise prevention. However, we do not believe minimising the need for temporary accommodation should be a measure of success in the SAPTA. Instead, the clear focus of the SAPTA should be on the provision of high quality temporary accommodation and support for those who need it.

We would submit that indicators B and C should explicitly refer to temporary accommodation, not simply accommodation as is currently stated.

3	<p>The first indicator of success identified in the Action Plan is: To minimise the need for temporary accommodation.</p> <p>The plan details this will be achieved through ensuring:</p> <ul style="list-style-type: none"> • Homelessness is prevented • Tenancies are sustained • Rapid rehousing • Investment in alternatives <p>These areas are further outlined on pages 15 & 16 of the draft Action Plan.</p> <p>Do you agree these are the correct areas of focus to achieve a minimised need for temporary accommodation?</p>	<p>YES</p> <input type="radio"/>	<p>NO</p> <input checked="" type="radio"/>
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We do not believe this indicator of success should be included in the final SAPTA. The criteria for success and actions highlighted should be incorporated in to the criteria for success outlined in Objective 1 and 3 of the Homelessness Strategy.

Considering the criteria for success first:

Homelessness Prevented

All four of the criteria for success under this heading are already incorporated under Objective 1 of the Homelessness Strategy.

Tenancies Sustained

We do not believe criteria related to tenancy sustainment should be considered in the SAPTA. Actions related to tenancy sustainment should be considered under Objective Three of the Homelessness Strategy.

- “Improved rate of tenancy sustainment across tenures.” This is an excellent and clear measurement. This criterion should be incorporated under Objective Three of the Homelessness Strategy.
- “Reduction in rate of repeat homelessness.” This is an excellent and clear measurement. This criterion for success should be incorporated under Objective Three of the Homelessness Strategy.
- “Widespread availability of support to tenants in need.” Objective Three of the Homelessness Strategy already incorporates a better criterion of success than this: “Support is tailored to suit individual need, both in the immediate and longer term.” Consequently, this criterion does not need to be incorporated.
- “Culture of rapid rehousing by default embedded.” The final plan needs to provide clarity as to what is meant by the term “rapid rehousing.” A similar criterion for success is included under Objective Three of the Homelessness Strategy. The language used there is a “significant shift to rapid rehousing.” It may be that these two criteria should be combined under Objective 3.
- “Expansion of Housing First and Housing Led Responses.” This criterion is already arguably partially incorporated under Objective Three of the Homelessness Strategy with the reference to a “significant shift to rapid rehousing”. A rewording may be needed to provide clarity in the final Homelessness Strategy.
- “Total length of stay in temporary accommodation reduced (cumulative customer experience).” We do not believe this criterion relates to tenancy sustainment. It is a valid criterion of success but we would submit that it is in the wrong part of the SAPTA and should be considered under the second indicator of success, “Customer receives appropriate accommodation and support at the point of need.” The first clause of this sentence is clear and measurable. The second clause, however, is capable of different understandings. If what is meant by this is that assessment should be taken of how long each customer is in temporary accommodation in total if they have moved between different forms of accommodation, then a better way of expressing this should be used in the final document.

Investment in alternatives to temporary accommodation

As with the previous two groups, “Tenancies sustained” and “rapid rehousing”, the criteria set out under this heading should be considered under Objective 3 of the Homelessness Strategy. We would highlight two difficulties we have with this group. Firstly, we would note that the language used here to describe this group is potentially confusing. Access to the PRS, sharing models and community hosting are models of housing provision rather than “alternatives to temporary accommodation” per se. Secondly, we would submit that all three criteria here are better

understood as actions rather than criteria of success and should be incorporated under the fourth indicator of success, “customers moving on from temporary accommodation sustain tenancies.”

- “Optimised move on from temporary accommodation through: Access to PRS, Sharing models and Community hosting.” We submit this criterion for success should be incorporated as an action under Objective 3 of the Homelessness Strategy. However, we believe it would be helpful to expand on what is meant by “sharing models” and “community hosting” in the final homelessness strategy. While many in the sector may understand what is intended, there is a possibility of differing interpretations of these terms.
- “Flexibility to ‘flip’ temporary accommodation to permanent tenancies.” In our estimation, this is not a criterion for success but should be considered as a potential action. As an action, we would submit it should be incorporated under the fourth indicator of success, “Customers moving on from temporary accommodation sustain tenancies.”
- “Reconfiguration of some long term intensively supported accommodation to settled long term accommodation.” We are uncertain as to what the difference is between this criterion and the previous one. With further clarification, it may be appropriate to incorporate it as an action under the fourth indicator of success.

A	Do you agree with the priority actions for this indicator as detailed in the Year 1 Action Plan?	YES <input type="radio"/>	NO <input checked="" type="radio"/>
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As noted above, we believe the first indicator should not be included in the SAPTA. The actions outlined here should instead be considered and incorporated in to Objectives 1 and 3 of the Homelessness Strategy where they are not already included. We do however believe many of the actions here are helpful, but they are simply found in the wrong place within the two documents.

Taking each action in turn:

- “Deliver public awareness campaign to shift mind-sets towards, and raise awareness of homelessness prevention.” A similar action is incorporated under Objective 1 of the Homelessness Strategy. The action states “Raise homelessness awareness through programmes which are co-designed with those who have lived homelessness.” We would submit that these two actions should be combined 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.” In our view this option is preferable due to the inclusion of a co-design process with individuals with lived experience of homelessness. We of course welcome measures which seek to raise awareness of homelessness prevention. However, we would welcome greater detail in the final document on how this action will be implemented.
- “Work towards the development of protocols for partner public services to ensure effective homelessness prevention pathways are in place.” This action should be incorporated under Objective 1 of the Homelessness Strategy. The development of protocols for this purpose would be valuable.
- “Target homelessness prevention initiatives to those at most risk, such as young people, including former care leavers, victims of domestic abuse, those with offending histories, and families with intergenerational repeat homelessness. Prioritise funding to those projects with best proven outcomes.” We submit that this action should be either combined with or added to the actions included in the secondary prevention section under Objective One. Arguably most aspects of this action are already present in the actions included there but we accept further consideration may produce better actions.

With finite resources, the use of targeting is imperative in maximising effectiveness. The difficulty with the wording around this action is that it is unclear whether this is a definitive list of groups who would be targeted by the Housing Executive for prevention initiatives or whether these are only potential examples. We would ask for clarification of this point in the final document.

- “Work with health partners to develop and deliver mental health support initiatives aimed at homelessness prevention.” This action should be incorporated under Objective 1 of the Homelessness Strategy. We fully support the development of strong and effective relationships with health providers around mental health. We would also point out that the Mental Health Strategy for 2021-2031 makes no substantive mention of households experiencing homelessness. We do welcome, however, the intention of the Department of Health to consult with the homelessness sector and those with lived experience of homelessness in the delivery of the Action plans associated with the Mental Health Strategy. We hope actions plans flowing from this strategy will include actions around this area.
- “Evaluate interventions to support access to and sustainment of tenancies in the private rented sector, including the impact of work carried out by Financial Inclusion Officers.” This should be included as an action under Objective 1 of the Homelessness Strategy. This is a useful action which can be clearly measured by the Housing Executive.
- “Establish forum for engagement with housing associations and private landlords to raise awareness, improve understanding and maximise their potential to better meet the needs of homeless households.” We fully support this measure. This action should be incorporated under Objective 1 of the Homelessness Strategy. We suggest that the use of the term “homeless households” should be amended to “households experiencing homelessness.” The draft Homelessness Strategy consistently uses the language of households experiencing homelessness and so should the draft SAPTA.
- “Develop measures to understand impact of homelessness prevention interventions and time taken for homeless households to achieve permanent housing solution. Replace current ‘length of stay’ measure which measures each placement by placement type, with a more meaningful measure which reports the cumulative customer experience in temporary accommodation.” The first part of this action should be incorporated under Objective 1 of the Homelessness Strategy while the second part should be incorporated under the second indicator of success in the SAPTA. We strongly welcome these actions, which would be helpful in providing a greater understanding of the reality of the experience of homelessness here.
- “Continue to build Housing First services across Northern Ireland by offering Housing Executive Housing First tenancies.” In our view, this action is not related to homelessness prevention or indeed temporary accommodation. We would submit that this action should be considered under Objective 3 of the Homelessness Strategy. The following action is already included under Objective 3- “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.² We welcome the emphasis the Housing Executive is giving to expanding this approach. However, we would ask for the final Action Plan to provide clarity on how these two actions relate to each other. We would suggest these two actions be combined and/or reworded under Objective 3 of the Homelessness Strategy.
- “Explore ‘flipping’ of temporary accommodation to permanent housing.” As discussed in Q3, we believe this action belongs under the fourth indicator for success.

- “Develop business case for delivery of a medium/long term community hosting model as alternative to temporary accommodation (i.e., as suitable medium/long term housing option).” We would submit that this action should be included under Objective 3 of the Homelessness Strategy. This is a welcome action, but we would submit it fits better in a different place in these two documents.

4	<p>The second indicator of success identified in the Action Plan is: Customer receives appropriate accommodation and support at the point of need, the plan details this will be achieved through ensuring:</p> <ul style="list-style-type: none"> • Comprehensive understanding of needs at point of presentation • Effective case management process • Flexible support models • Flexible accommodation options • Reduced usage of hotel/B&B accommodation <p>These areas are further outlined on pages 17 & 18 of the draft Action Plan. Do you agree these are the correct areas of focus to ensure the customer receives appropriate accommodation and support at the point of need?</p>	YES <input checked="" type="radio"/>	NO <input type="radio"/>
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In our view, this section should refer to “temporary accommodation” rather than “accommodation.” We agree that these five areas are the right ones to consider under this criterion of success. As with the first indicator of success, we have some comments on the measurements included under each of the five.

Understanding Needs

- “Support needs captured on ongoing basis.” This is an important and helpful measurement.
- “Routine application of a ‘common assessment framework’ to match needs to services.” This is a welcome measurement and if adopted would lead to better outcomes for those experiencing homelessness.
- “Effective housing and support planning (at individual and strategic levels).” We are unclear what this measurement aims to capture. Greater detail needs to be provided regarding what constitutes “housing and support planning” at individual and strategic levels.

Effective case management

- “Reduced mismatch between customer needs and current accommodation/support.” We welcome a commitment to see this gap closed. However, we would submit that more work needs to be done in this area before substantive and meaningful action to close the gap could be achieved. We would submit that an in-depth review of what services are available in temporary accommodation and where they are based is required. The Campbell Tickell research in to temporary accommodation, as helpful as it is, did not provide a detailed consideration of each temporary accommodation service. To be fair, this was not the purpose of the research. To reduce the mismatch, there has to be clarity on precisely what the extent of the mismatch is and where in NI it impacts. We would further add that consideration needs to be given to the referral process and how the Housing Executive can ensure individuals with complex needs are allocated to the right service to meet their needs. It is acknowledged that it is hugely challenging to achieve this when so much pressure is on the system.
- “Collaborative case management processes embedded.” This is a straightforward measurement which would be welcome.
- “Staff are knowledgeable and fully trained.” It is important that staff are knowledgeable and fully trained. We strongly support the professional development of staff and would

submit in the medium term the development of a qualification for the homelessness sector would be a worthwhile endeavour.

- “Effective and efficient systems for sharing information”- The introduction of such systems would be welcome. This could involve, for example, an information sharing agreement between the temporary accommodation provider and the Housing Executive (and potentially other providers of Temporary Accommodation) with usage of it monitored as part of funding arrangements.

Flexible Support Models

- “Tailored to needs, Value for Money, Multi-disciplinary, Accessible by individuals regardless of accommodation and outcomes focused.” We very much welcome all these measurements which are capable of evaluation.

Flexible Accommodation Options –

- “Continuum of options available to meet needs, Value for Money, Range of contractual options for private sector provision, Optimal use of Social Housing, Test & Learn approach normalised and ‘Everyone In’.” It is important that this section is clear as to whether it refers solely to temporary accommodation or to wider housing options. In our view, it is evident that this should refer to temporary accommodation but the language used does not make this clear.
- Some of these are good measurements which are capable of assessment. However, we are unclear about how the “optimal use of social housing” would be assessed by the Housing Executive in practice. We would also highlight that while we understand what ‘Everyone In’ is, this may not be the case for every reader of this document. It is also unclear what is being measured regarding ‘Everyone In’. In our response to the draft Homelessness Strategy, we have submitted that the Housing Executive should consider the development of anonymised data collection on the number of individuals impacted by the NRPF criteria. If this is what is envisaged by the Housing Executive in the inclusion of this measurement, we would welcome it.

Reduced usage of hotel/B&B accommodation

- “Crises prevented where possible to negate need, stays in hotel/B&B as short as necessary, no children placed in hotel/B&B, and alternative models of emergency/crisis accommodation available.” These measurements are clear and capable of assessment. Ideally, no-one would be placed in hotel/B&B accommodation but we understand why the Action Plan highlights in particular the need for children not to be placed in such accommodation.

A	Do you agree with the priority actions for this indicator as detailed in the Year 1 Action Plan?	YES <input checked="" type="radio"/>	NO <input type="radio"/>
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We broadly agree with the actions set out in this section. Below we note some omissions in terms of actions which we believe should be included.

Taking each action in turn:

- “Continue to embed Common Assessment Framework as main tool to assess and record needs on an ongoing basis.” This is a welcome action.
- “Develop local homelessness action plans based on analysis of local supply and demand issues; to include plans for prevention, rapid re-housing, and temporary accommodation and support provision.” We welcome the development of local homelessness action plans as it is recognised that the manifestation of homelessness can vary in different parts of NI.

For such plans to be effective they need to work with the grain of the Homelessness Strategy and be properly funded.

- “Maximise the capacity of temporary accommodation portfolio by ensuring effective case management and void management practices; introduce routine reporting of occupancy across temporary accommodation types.” We welcome both actions. Routine reporting of occupancy across temporary accommodation is necessary. We would submit that the introduction of a Central Access Point should be considered as an additional action in this section. At our consultation event with our Public Policy Forum, strong support for the introduction of a Central Access Point was expressed. This would assist in developing routine reporting of occupancy.
- “Commence redesign of Housing Executive-owned temporary accommodation (283 hostels and dispersed units). There is a need to retain the level of units currently designated as temporary accommodation, but in order to support rapid rehousing approach no further units should be converted for temporary use.” We believe further consideration is needed before committing to this action in the Action Plan. We understand the rationale behind this action. However, at the current time, the temporary accommodation system remains under huge pressure and it is unclear what coming years will hold in this regard. It may be that the Housing Executive may be forced to consider adding additional units of temporary accommodation in the short to medium term. We would suggest a change of language to provide flexibility to the Housing Executive to change course if circumstances demand it.
- “Increase provision of dispersed self-contained accommodation units for singles with wraparound support as required.” This is a positive action. We would welcome further detail from the Housing Executive on how many additional units it believes are needed. While we know this is not the intention of the Housing Executive, technically this action would be fulfilled if one additional unit were added to the current portfolio. It may be possible to reword this action to illustrate that this is not the intention.
- “Complete evaluation of ‘emergency accommodation for families’ pilot and use findings to take forward longer term response to ensure children are not housed in hotel/B&Bs.” We welcome this action.
- “Continue roll out of Shared Tenancies for young people.” Shared tenancies can be a suitable solution for some young people so we welcome this action.
- Test new models of emergency accommodation for young people, to cater for the full continuum of support needs.” We welcome this action.

It is noteworthy here that the need for new models of emergency accommodation for young people is specifically referenced in the draft Action Plan (and rightly so) but that no such action is specified for other specific vulnerable groups. In the research conducted for the Housing Executive entitled “Homelessness Service User Journeys”, one of the recommendations set out is as follows: “As part of the next 5-year Homelessness strategy more focussed work should be undertaken to provide specialist hostels for specific groups; for example, in this research – young homeless people, chronic homeless people and those with IV drug/poly drug use – with specialist staff who understand the needs of these specific client groups and can develop and target appropriate services. In addition, the Housing Executive should review rules, curfews and tolerance levels with a view to ensuring that service users are placed in settings which will support them and their needs, and will not result in unnecessary levels of placement breakdown due to inability to keep the rules.”³ In our view, these are recommendations which should be implemented during the five years of the Action Plan.

It is worth noting that the Campbell Tickell research conducted for the Housing Executive came to a similar conclusion stating the following: “Participants in the stakeholder consultations

highlighted a number of gaps in provision. These included the need for specialist temporary accommodation for people with complex needs, addiction issues, criminal records, learning difficulties, with further gaps in provision for older offenders with mobility concerns, prison leavers and harder to reach categories such as those without a mental health diagnosis and those not engaging in services. Participants said that people with accessibility and mobility issues have very limited choice.”⁴

However, on our reading of the plan, there is no explicit commitment to consider the development of specialist hostels or models for specific groups beyond the notable example of young people.

It is pertinent to consider as well recently published research conducted by Fiona Boyle for the Housing Executive entitled “The Impacts of Chronic Homelessness for Women.” One of the recommendations set out from the Stakeholder feedback was as follows: “The need to develop specific temporary accommodation suitable for this grouping (including standard or non-standard). Under this theme stakeholders made suggestions about the need for female-only hostels, including provision for in-house therapeutic services, with planned move-on options including stand-alone accommodation connected to a hostel site and units in the community with associated Floating support.”⁵

Indeed, it is notable that the draft Strategic plan at no point directly considers the differential impact of homelessness according to gender. The report notes 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.”⁶

In our view, a specific action should be included around exploring the accommodation needs of women. This should include seeking to remedy the difficulties highlighted in the report around quantifying the extent and nature of chronic homelessness amongst women.⁷ The recommendations of the report by Fiona Boyle should be closely considered in the development of actions in the final action plan.

It should also be noted that while there are references to domestic abuse in the draft Strategic Action Plan, the action which mentions it is focused on “homelessness prevention initiatives” rather than increasing specialist support for those impacted. As the Supporting People Strategic Needs Assessment notes, “Domestic violence and abuse happens in the home. It can involve physical contact, verbal or emotional abuse and threats to harm or kill you. Men and women experience domestic violence and abuse. Domestic violence can happen regardless of age, gender, social background, ethnicity, disability or lifestyle and victims often feel isolated and frightened.”⁸ The Strategic Needs Assessment highlights a substantial gap between the supply of support for victims of domestic abuse and the demand for it. At the current time, the Strategic Needs Assessment points to a gap of 49.4% units between current supply and demand for support. This is an undersupply of 648 units of support. Indeed, this group has the biggest gap between supply and demand of any category considered in the strategic needs assessment.⁹ The Action Plan does note that “It is anticipated that there will be increased demand from victims of domestic abuse. Remodeling of services for this client group should be considered.” However, despite this welcome acknowledgement of the issue the Action Plan does not set out any specific proposals to address it. We would recommend this issue is specifically addressed in the final SAPTA.

A further issue we would highlight pertaining to provision of temporary accommodation relates to the fact that nothing in this Action Plan directly appears to address the lack of temporary

accommodation provision in rural areas. The word “rural” does not appear in the Action plan. The Campbell Tickell research highlighted that such provision is “sparse.”¹⁰ The researchers go on to note what the consequences of this lack of provision are: “This raises important questions for the Housing Executive in terms of rural policy, in that homeless people living in small rural communities would usually be required to relocate to a larger town or city if they required temporary accommodation. This has implications particularly for those who are in work, and for families with children at school. The lack of provision outside towns may be a factor in homeless households turning down offers of temporary accommodation.”¹¹ Considering the negative impact that the lack of rural provision can have, we would submit that explicit consideration of this issue should be included in the final Action Plan.

5	<p>The third indicator of success identified in the Action Plan is: A sustainable supply of good quality, affordable accommodation which is safe, warm and well-managed, the plan details this will be achieved through the development of:</p> <ul style="list-style-type: none"> • A sustainable supply • Physical standards • Suitability standards • Service standards <p>These areas are further outlined on pages 19 & 20 of the draft Action Plan. Do you agree these are the correct areas of focus to ensure good quality, affordable accommodation which is safe, warm and well-managed</p>	YES <input checked="" type="radio"/>	NO <input type="radio"/>
<p>As with the second indicator of success, we submit the wording of this indicator should be changed to make it clear that these criteria are focused on temporary accommodation.</p> <p>We agree that the four areas outlined here provide a suitable framework for this criterion of success.</p> <p>Taking each in turn:</p> <p>Sustainable Supply</p> <ul style="list-style-type: none"> • “Strategic range of partnerships in place with a range of accommodation providers; A combination of short and long term leasing agreements in place with providers; safeguarded supply; affordable and value for money; assured quality standards; Flexibility to match provision to identified need.” These measurements are logical and understandable. <p>Physical Standards</p> <ul style="list-style-type: none"> • “Safe and secure; Accessible by those with disabilities; clean; warm; Psychologically informed environments; adequate access to cooking facilities; adequate access to washing facilities; adequate provision of furniture and household items.” These measurements are all logical under this criterion of success. However, a number of these measurements are potentially subjective. <p>Suitability Standards</p> <ul style="list-style-type: none"> • “Affordable; Accommodation is of appropriate size and type to meet households’ needs; located within reasonable distance of transport links, workplace, schools/schools colleges access to services.” These measurements are all logical for this category. Particularly 			

regarding the 'affordable' criteria, it would be helpful if more detail could be provided on how this criteria will be practically implemented.

Service Standards

- "Flexible and person-centred; Value for money; Psychologically informed services; conditions of occupancy clearly communicated; appropriate levels of staff who are well trained and knowledgeable; repairs and housing management issues resolved in timely manner." These measurements again are suitable. We would also ask whether this is an area which would be better considered through the Supporting People strategy or whether it is envisaged that this action plan will harmonise with that document.

A	Do you agree with the priority actions for this indicator as detailed in the Year 1 Action Plan?	YES <input checked="" type="radio"/>	NO <input type="radio"/>
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This section should make clear that these actions refer to temporary accommodation. As with the other criteria for success, we broadly agree with the actions set out.

Taking each action in turn:

- "Commence the development of strategic partnerships with a range of accommodation providers to deliver a sustainable supply of temporary accommodation to match identified need." Regarding this action, we would highlight the fact that a number "strategic partnerships" already exist with accommodation providers in the homelessness sector. This action should be rephrased to reflect this fact. It is recognised that this action will prove hugely challenging in practice.
- "Commence the development of a value for money framework for temporary accommodation." This action would be welcome. We would recommend this action explicitly stating that this will take place in "consultation with the homelessness sector."
- "Introduce new contractual arrangements for private sector temporary accommodation, such as short and long term leasing models. Ideally a range of options will allow us to balance risk and flexibility." We would appreciate greater detail on what this action will entail in practice.
- "Explore potential for Housing Executive to purchase properties for temporary accommodation." This would be a valid move for the Housing Executive to take. We are aware from our members of how expensive obtaining single lets can be for the Housing Executive. We would ask how this relates to the action set out under the second indicator of success: "Commence redesign of Housing Executive-owned temporary accommodation (283 hostels and dispersed units). There is a need to retain the level of units currently designated as temporary accommodation, but in order to support rapid rehousing approach no further units should be converted for temporary use." These two actions could be read as contradictory, but we accept that this is not necessarily the case. Clearer wording could clarify this in the final action plan.
- "Commission work with customers and providers to agree standards for temporary accommodation. This should include physical standards, suitability standards and service standards for all types of temporary accommodation." We warmly welcome this action. The fact that "there are no specific standards for temporary accommodation... nor is there a consistent approach to monitoring standards" needs to be addressed.¹² Such standards have been necessary for many years and will help ensure consistently high standards across temporary accommodation. The Campbell Tickell research found that stakeholders believe that "standards in temporary accommodation vary considerably."¹³ While this will always be the case to some degree, the floor of the quality of temporary accommodation needs to be set at the right level to ensure all service users receive the quality of service they deserve.

We would recommend that there should also explicitly be consideration of how these standards, once they are agreed, are to be monitored. Without effective and reasonable monitoring, excellent standards could come out of this process but fail to deliver the outcome the standards have been introduced to produce. The importance of effective monitoring was strongly emphasised by RSUN members at the consultation event we held with them. In our estimation, it would be important to consider the equivalent guidance in place across the United Kingdom for temporary accommodation. We would further stress the importance of ensuring that both the service user and provider voices are heard in the development of standards.

- Members of our Public Policy Forum indicated that they agree that ensuring high standards in temporary accommodation is important. They did note, however, that it is also important that standards in the Private Rented Sector are improved and monitored. It was further submitted that the Housing Executive should ensure single lets they use as temporary accommodation are of a high standard.
- “Commence the reconfiguration of accommodation-based services with shared rooms.” While this action may be necessary, we would welcome further conversation about what this will entail in practice.
- “Work with providers and Supporting People on a remodelling programme for large scale congregate hostels.” As with the comment above, we would welcome further conversation on what this will involve in practice.

6	<p>The fourth indicator of success identified in the Action Plan is: Customers moving on from temporary accommodation sustain their tenancies, the plan details this will be achieved through ensuring:</p> <ul style="list-style-type: none"> • Enabled customers • Enabled providers • Enabled communities <p>These areas are further outlined on pages 21 & 22 of the draft Action Plan. Do you agree these are the correct areas of focus to ensure customers moving on from temporary accommodation sustain their tenancies?</p>	<p>YES</p> <p><input checked="" type="radio"/></p>	<p>NO</p> <p><input type="radio"/></p>
<p>With this criterion for success, we submit that while some aspects of it are appropriate for the plan other aspects should not be included in the final SAPTA. A number of the actions in this section are either already considered under Objective three of the Homelessness Strategy or should be considered there.</p> <p>Turning to the Criteria for success identified:</p> <p>Enabled Customers</p> <ul style="list-style-type: none"> • “Reduced levels of repeat homelessness; Customers with skills for independent living; Continued availability of support as required in long term housing.” These are all suitable measures. <p>Enabled Staff</p> <ul style="list-style-type: none"> • “Flexible, empowered and responsive staff; Knowledgeable and well-trained frontline staff; staff apply psychologically informed approaches.” These are all suitable measurements. <p>Enabled Communities</p> <ul style="list-style-type: none"> • “Widespread availability of community-based supports; expansion of community volunteering programmes; Local ownership of outcomes within local action plans to end 			

homelessness.” While these are suitable criteria for success to be considered, we would submit that these criteria as written would sit better under Objective three of the Homelessness Strategy rather than in the SAPTA. It is unclear from the wording adopted in the draft as to whether any of these actions involve temporary accommodation. It is possible that they may do, but this is not clear. We would ask for this to be explicitly clarified in the final action plan.

A	Do you agree with the priority actions for this indicator as detailed in the Year 1 Action Plan?	YES <input checked="" type="radio"/>	NO <input type="radio"/>
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We would submit that some of these actions are appropriate for the SAPTA while others would sit better under Objective three of the Homelessness Strategy.

Taking each action in turn:

- “Test flexible support models both within temporary accommodation and once customer has moved to permanent housing option to support.” This is a welcome action and should be included in the SAPTA. 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. Consequently, the idea of testing “flexible” support models is welcome.
- 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.
- “Expand provision of Housing First.” As discussed above, this action is put forward in two other places within the SAPTA and the Homelessness Strategy. We would suggest this action is combined with the other two under Objective three of the Homelessness Strategy.
- “Develop projects to build community capacity to prevent homelessness and sustain tenancies.” This action should be incorporated under Objective Three of the Homelessness Strategy. This action, alongside the next action, should be combined with the two actions set out under ‘Community Integration’ in the Homelessness Strategy (p48 of that document). There is considerable overlap between these actions.
- “Help promote community volunteering programmes aimed at supporting independent living and tenancy sustainment.” See comment above.
- “Develop local homelessness action plans based on analysis of local supply and demand issues; to include plans for prevention, rapid re-housing, and temporary accommodation and support provision.” This action is crucially important and welcome. While this action could fall under a number of different areas of the Homelessness Strategy and SAPTA, we do welcome its inclusion and accept its use here.
- “Mainstream the collaborative case management approach developed through the Belfast Complex Lives project, subject to successful evaluation of pilot project.” We warmly welcome this action but would submit it sits better within the Homelessness Strategy under Objective 3 rather than in the SAPTA. We would submit that the wording of this action should replace the wording currently in the Homelessness Strategy. 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. 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.

It is worth noting that even if these actions are effectively implemented, without an adequate supply of suitable housing it will be impossible to achieve the objective set out here. We know that the Housing Executive is cognisant of this fact. Back in 2019, when Campbell Tickell surveyed providers of temporary accommodation, providers indicated that the substantial majority of households (70%) were 'tenancy ready'. Acknowledging that there is some debate around judgments of whether a household is 'tenancy ready', it is evident that temporary accommodation providers believe a substantial proportion of those using their services are able to sustain a tenancy. As the researchers put it, this finding "suggests that a significant proportion of residents were staying in hostel accommodation longer than was strictly necessary if their need for ongoing support was the only consideration. There are two implications of this: either the non-availability of alternative settled accommodation is causing delays in resettlement rather than the household's ability to sustain a tenancy; or, the need for ongoing support outweighs the advantages of a more rapid move into settled accommodation unless floating support is available after the move."¹⁴

While the advent of the Covid pandemic has undoubtedly had a major impact on temporary accommodation and throughput, our view would be that the situation today remains very similar to what it was in 2019. As we state in our response to the draft Homelessness Strategy, the Housing Executive needs to work closely with the Department for Communities on the development and crucially the implementation of the Housing Supply Strategy.

7	Do you agree with the enablers that are outlined in the draft Action Plan?	YES	NO
A	Customer	<input checked="" type="radio"/>	<input type="radio"/>
B	Funding	<input checked="" type="radio"/>	<input type="radio"/>
C	Staff	<input checked="" type="radio"/>	<input type="radio"/>
D	Technology	<input checked="" type="radio"/>	<input type="radio"/>
E	Process	<input checked="" type="radio"/>	<input type="radio"/>
F	Collaboration	<input checked="" type="radio"/>	<input type="radio"/>

These six enablers are all appropriate. We particularly welcome the commitment to "use innovative methods to engage stakeholders to co-design and co-deliver" although we would point out that none of the actions in the strategy specifically mention the development of engagement with service users. We note that such actions are included in the draft Homelessness Strategy.

We note that under the funding enabler, it is stated that "we will prioritise and target funding to where it will make the most impact." We recognise that the timing of the development of this strategy made it impossible for the Housing Executive to provide detail on the funding due to the fact that the multi-year budget for 2022-2025 was still in development when the strategy was being developed. Ideally, greater financial information would be available in advance of the development of the homelessness strategy.

G	Do you agree with the priority actions for this indicator as detailed in the Year 1 Action Plan?	YES	NO
		<input type="radio"/>	<input type="radio"/>

As with our comments on two of the previous sections, we broadly welcome the actions set out but would request greater detail on some of the actions.

Taking each action in turn:

- “Implement revised framework for hearing our customer voices and ensuring they are at the heart of service design and delivery.” We welcome this action and the commitment to listening to service users. We would ask for further detail on how this will marry up with the proposals in the draft Homelessness Strategy to listen to service users.
- “Ensure effective commissioning structures are in place to prioritise funding.” It is logical to seek to have “effective commissioning structures.” We would submit that organisations in the homelessness sector should be involved in the development of these commissioning structures.
- “Commence rolling training programme for staff across the sector to equip staff to deliver psychologically informed responses (based on training needs assessment conducted 2021/22).” We welcome this action and look forward to inputting to and supporting with the delivery of training. Homeless Connect had a positive experience of providing training funded by the Housing Executive between December 2020 to March 2021 and would welcome the opportunity to collaborate further.
- “Consider opportunities for staff interchange programmes and co-location of services.” This is a sensible proposal.
- “Continue to develop specification for digital solutions to support implementation of common assessment framework, provision of bed availability information, producing meaningful measures and data analysis.” This is a positive action.
- “Routinely communicate performance, budgetary, and trend information to stakeholders in user friendly formats.” This is a positive action.
- “Actively embed culture of innovation, empowerment, ownership and trust across homelessness services.” This is a welcome action.
- “Complete research to understand the impact of homelessness and temporary accommodation stays on children.” This is a welcome action.
- “Develop value for money framework.” We would ask that this framework is developed by the Housing Executive in consultation with the sector.
- “Mainstream the collaborative case management approach developed through the Belfast Complex Lives project, subject to successful evaluation of pilot project.” We have commented on this action above.

8. Please provide any other comments which should be considered in the development of the Action Plan:

We have three other comments to make on the content of the Strategic Action Plan.

1. The analysis outlined in the plan on the current situation facing the temporary accommodation system is cogent and helpful. The fact that the SAPTA has been produced in conjunction with the draft Homelessness Action Plan does help to develop the “much stronger link between the Homelessness Strategy and the development of a strategy and planning for temporary accommodation” recommended in the Campbell Tickell research.¹⁵ While we have submitted constructive proposals to amend the SAPTA, we want to recognise the strengths of the draft plan as well.
2. A noteworthy omission in the actions set out in the document is any reference to the impact of substance use. It is well known that substance use can be a factor in the journeys of some in to homelessness. It can also be a factor which makes tenancy

sustainment more challenging. This is acknowledged in the draft Action Plan in the analysis of homelessness sections of the document (see p6 and 15). Indeed, on p16 the following comment is made: “There are particular gaps in supply to accommodate those with convictions for arson or sex offences, and polysubstance abuse. There is a need for additional provision to meet these gaps.” This is a point well made. Similar evidence on this point was also outlined in the Supporting People Strategic Needs Assessment.¹⁶ However, none of the actions set out in the draft SAPTA or the Homelessness Strategy address this point specifically. Considering how substantial an issue substance use can be, particularly in chronic homelessness, this is something which we submit should be remedied in the final document.

3. On p3, in the first paragraph of the introduction, the phrase “homeless customers” is used. We would submit that this should be “customers experiencing homelessness.” As we outlined above, homelessness does not define those who experience it as this language implies. The Housing Executive and all statutory agencies should move away from the language of “homeless people” or “homeless customers.” The draft Homelessness Strategy consistently uses the language of households experiencing homelessness and so should the draft SAPTA.

9. Please provide comments on how the Action Plan should be monitored and reported against:

Homeless Connect believes effective monitoring and reporting is of major importance. It is noteworthy that in contrast to the draft Homelessness Strategy, there is no section on how delivery will be monitored and reported against in the draft SAPTA. In our estimation, this should be remedied in the final strategy document.

It would be helpful in our view for meetings to scrutinise the implementation of the Action Plan on a quarterly basis. The Central Homelessness Forum may be the most appropriate forum. Alternatively, a sub-group of the Forum made up of temporary accommodation providers and relevant staff could be formed for the purposes of monitoring how the Action Plan is being implemented. Each year a report should be produced outlining clearly which objectives have been fulfilled and which have not.

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.

¹ 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> 11.

² “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.

³ Fiona Boyle, "Homelessness Service User Journeys", *Housing Executive*, March 2021, <https://www.nihe.gov.uk/Documents/Research/Homelessness/Homelessness-Service-User-Journeys.aspx?ext=>. 117

⁴ 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=> 44

⁵ 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=> 99.

⁶ "The Impacts of Chronic Homelessness for Women," 22.

⁷ "The Impacts of Chronic Homelessness for Women," 98. One of the recommendations included is a "need to quantify the extent and understand the nature of chronic homelessness amongst women."

⁸ Department for Communities, "Supporting People Strategic Needs Assessment", November, 2020, 176.

⁹ Department for Communities, "Supporting People Strategic Needs Assessment", November, 2020, 181.

¹⁰ "Strategic Review of Temporary Accommodation" 73

¹¹ "Strategic Review of Temporary Accommodation" 73

¹² "Strategic Review of Temporary Accommodation", October, 2020, 113.

¹³ "Strategic Review of Temporary Accommodation", October, 2020, 113.

¹⁴ "Strategic Review of Temporary Accommodation", October, 2020, 109.

¹⁵ "Strategic Review of Temporary Accommodation", October, 2020, 136

¹⁶ "Supporting People Strategic Needs Assessment" 10: "Pressure points in relation to Placement of IV drug users: there is small number of suitable services available and increasing need" 13 and "Some providers have outlined that the age and addiction profile of the homeless is changing significantly and it is no longer a case of one size suits all. Presenters can have 'chaotic' lifestyles with high risk behaviours and with the increasing use of drugs especially IV drug use there is a need to have a safe space with specialised facilities and trained staff to support these individuals." 157.



Homeless Connect

Andras House | 60 Victoria Street Belfast | BT2 7BB

homelessconnect.org