



Submission

to the Consultation on
Changes to the
Discretionary Support
Scheme Draft Equality
Impact Assessment

July 2023

homelessconnect.org

Homeless Connect Response to Consultation on Changes to the Discretionary Support Scheme Draft Equality Impact Assessment

Introduction

1. Homeless Connect has been working to prevent and alleviate homelessness in Northern Ireland since 1983. As a membership body, we represent organisations working with people experiencing homelessness or at risk of becoming homeless and provide direct support to service users through our projects.¹

2. In our response to the initial consultation by the Department for Communities we made the following observations pertaining to the proposed changes to the Discretionary Support Scheme: “We are gravely concerned about the proposed cut to Discretionary Support (DS) grants. As the Department will be aware, these grants can serve as an invaluable lifeline to households who may be on the edge of homelessness. With so many struggling to make ends meet, this cut will be hugely damaging to many of the poorest households living here. We would submit that this cut runs against the strategic shift we need to see towards preventing homelessness before it happens rather than reacting to it after the fact. It may in practice prove far more costly to fail to provide a grant or loan than to do so if it leads to destitution or homelessness. We would urge reconsideration of this proposal.”²

3. It is deeply regrettable that the Department for Communities has been placed in the invidious position of having to implement a budget which will generate cuts to the level of support available through the Discretionary Support Scheme. It is manifestly clear that the political decision to proceed with this budget settlement and the cuts which flow from it will have damaging impacts on some of the poorest and most vulnerable people living here. It runs against the rhetoric so often heard about the importance of protecting the most vulnerable. We acknowledge this is not the path that the Department wants to take and that in consideration of the overall budget envelope the Department feels that a cut of over 50% to the final grant spend in 2022-23 was the only option available. We cannot agree with this decision while understanding the rationale provided by the Department for why they have had to take this choice.

4. As the representative body of the homelessness sector here, we particularly want to emphasise how this choice runs against the approach adopted in the Homelessness Strategy for 2022-2027 of seeking to prioritise homelessness prevention. As the strategy puts it, “Our current response to homelessness in Northern Ireland is still focussed largely on responding to people who find themselves in crisis situations. Our ambition 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.”³ The Discretionary Support Scheme is a lifeline for some households who are on the brink of potentially losing their home. It can be the right support at the right time which can make a real difference in sustaining a tenancy. Reducing funding for discretionary support and tightening the criteria for access may take away crucial support which could be crucial in preventing a household falling in to homelessness.

5. Tipping over the edge into homelessness is not only a tragedy for the household concerned in terms of their wellbeing, health and economic prospects. It comes with substantial additional costs to the state in terms of funding of housing, justice, education and health. These costs can vastly exceed the

preventative spending which may have made a real difference. The Discretionary Support Scheme is a strategic intervention. In an ideal world, such a scheme would not be necessary as employment and/or the welfare system would ensure that every household had enough to live on. However, as the Independent Review of Discretionary Support pointed out- "It is the panel's view that the social security system should be able to protect the dignity and human rights of individuals by giving them access to an adequate income. Neither social security nor employment currently guarantee this and so Discretionary Support remains vital."⁴ In the midst of a cost of living crisis with inflation remaining high, we simply cannot support a move which seeks to cut vital support to some of the most vulnerable households living here. This is balancing the budget on the shoulders of those who can least afford it.

Question 1: Are there any data, needs or issues in relation to any of the Section 75 equality categories that have not been identified in Section 3 of the EQIA consultation document? If so, what are they, and can you provide details?

6. We have nothing further to add.

Question 2: Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in Section 4 of the EQIA Consultation document? If so, what are they?

7. We have nothing further to add.

Question 3: Please state what action you think could be taken to reduce or eliminate any adverse impacts in the allocation of the Department's Discretionary Support grant budget.

8. Turning to the specifics of option 2 as outlined in the consultation document, we have three points to raise. Firstly, there is a lack of detail provided as to what the financial implications of the two overall sets of measures would be in practice. The overall headline figure of a cut from £40.3 million to £20 million is provided. However, no detail is provided as to how these two sets of measures set out in option 2 will generate the cut of £20.3 million. Consequently, it is very difficult to assess options which could be taken to mitigate the effects in the absence of knowing what the Department's assessment is of where the cuts will fall. To have produced these figures, the Department must have made this assessment so it is disappointing that these have not been provided in the consultation document. Providing this level of detail would have allowed for a more informed response.

9. Secondly, we note the following paragraph on p9: "Discretionary Support grants are currently paid for a wide range of items from those which are considered absolutely essential basic needs such as cookers and beds, to those which could be deemed important but non-essential in most circumstances such as floor coverings and kitchen items (kettles, toasters etc). Restricting awards to those items deemed absolutely essential would ensure that the highest priority needs continue to be met."⁵ We would ask how the Department determines the distinction between what it deems to be "absolutely essential basic needs" and items which are "non-essential in most circumstances." While a couple of examples are provided in the consultation document of each category, the level of detail provided leaves uncertainty around what items would and would not be classed as "absolutely essential basic needs." Further clarification on precisely how this will be applied should be provided by the Department.

10. Thirdly, we note the extension of the exclusion period to twenty-four months. While we do not doubt that the average electrical appliance and beds/mattresses have a life span of over six years, we also know that these are averages- there will be exceptions. Extending the period of time in which an item can be re-awarded by a year could leave a household without what the Department describes as “absolutely essential basic needs” being fulfilled for a lengthy period. This may lead to challenges with tenancy sustainment depending on the particular need in question.

11. We note that there is a data gap identified in the Assessment of Impacts: “Almost 14% (4,108) of respondents had also received an award for items during the 2021-2 financial year. There is no mechanism to ascertain if the item awarded in the 2022-23 financial year was for a duplicate item awarded during the 2021-2 financial year. However, as this is the only indicator of repeat items awarded, this figure was used as the baseline to assess the level of impact, of extending the period for repeat items, may have on the service users.”⁶ A substantial gap has been identified here and it is not clear how many people would be impacted in practice once this policy is implemented. We would call on the Department to address this data gap going forward.

Question 4: Are there any other comments you would like to make in regard to this proforma or the consultation process generally?

12. It is pertinent to outline a general concern about this consultation. The document outlines that “due to the significant budgetary pressures these measures will be applied from 3 July 2023 with the EQIA running concurrently.”⁷ The consultation document then outlines only two options for the way forward, one of which is set out to be implausible (to do nothing). It seems evident that the Department has already decided on the course it is going to take so in this instance we question the overall purpose of running a consultation of this nature.

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References

¹ ‘Homeless Connect’ is a registered charity in Northern Ireland (charity number 103325)

² Homeless Connect, “Submission: Consultation on Department for Communities Budget 2023-24 Allocations”, June 2023, <https://homelessconnect.org/wp-content/uploads/2023/06/Homeless-Connect-Submission-to-DfC-Consultation-on-2023-4-Budget-Allocation-05-06-2023.pdf>, 5-6.

³ Housing Executive, “Ending Homelessness Together: Homelessness Strategy 2022-2027,” <https://www.nihe.gov.uk/getattachment/73313718-aa0e-4aae-b122-6573dcab88c7/Ending-Homelessness-Together-Homelessness-Strategy-2022-27.pdf> 27.

⁴ Department for Communities, “Independent Review of Discretionary Support,” January 2022, <https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-independent-review-of-discretionary-support-22.pdf> 128.

⁵ Department for Communities, “Discretionary Support Scheme,” 9.

⁶ Department for Communities, “Discretionary Support Scheme,” 12.

⁷ Department for Communities, “Changes to the Discretionary Support Scheme: Draft Equality Impact Assessment”, July 2023, <https://www.communities-ni.gov.uk/consultations/consultation-changes-discretionary-support-scheme>, 7.



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