

NILGA Response to the Northern Ireland Housing Executive's Ending Homelessness Together Strategy for Northern Ireland 2017-22

The following paper responds to the Northern Ireland Housing Executive Homeless Strategy for Northern Ireland 2017-22, **requiring response by 8th February 2017. This response will be finalised retrospectively at the NILGA Executive meeting on 10th February 2017.**

Any queries related to this submission can be dealt with by contacting Fiona Douglas at the NILGA Offices: Email: f.douglas@nilga.org Tel: 028 9079 8972

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Chief Executive**

3rd February 2017

1.0 Introduction and context

NILGA, the Northern Ireland Local Government Association, is the representative body for councils in NI. NILGA develops policy guidance for the sector in direct liaison with the eleven local authorities.

The Association welcomes the opportunity to respond to the Northern Ireland Housing Executive's consultation on Ending Homelessness Together, Homelessness Strategy for Northern Ireland 2017-22.

NILGA notes the reference to the draft Programme for Government (PFG) and in particular the outcomes-based approach being taken in developing the new Programme and welcomes the aspiration to align the homelessness strategy with the emerging PfG.

NILGA commends the NIHE in what is a genuine attempt to understand and plan services around the complexities of homelessness. NILGA welcomes the realisation running through the proposals of need for more service user driven, collaborative approaches. NILGA considers this to be in the spirit and practice of the draft Programme for Government – with its proposed ethos of outcomes based co-design, co-implementation and co-delivery heralded by the PfG and Local Government's community plans. PfG communicates the direction of travel regarding where the NI Executive – and its partners - is hoping to get to in service delivery terms and how it will measure success in getting there. There is a strategic framework, therefore, around which the Housing Sector can consolidate its programmes, with an incremental, less cluttered, strategic landscape. This new landscape presents real opportunity to secure better outcomes for ending homelessness.

2.0 General comments

We welcome the clear commitment of the Strategy to tackle homelessness and that this is not limited to just those who qualify as full duty applicants. We also welcome the commitment to

ensure 'the provision of appropriate support service to assist all homeless households to find and sustain long term solutions.

Regarding hidden homelessness, it is impressive that there is a better understanding of the nature and extent of these social problems in Northern Ireland than in many other European countries or regions. Further, NILGA welcomes the small fall in the estimated projected points for the potential for concealed households in Northern Ireland. Where there have been drops in homelessness related statistics, where available, it would be worth providing analysis of the measures taken that may have influenced this projected downward trend. Such analysis is of great use in informing the development of future services as a means of turning the curve on what is a devastating circumstance for any household, which in turn would assist councils in terms of Planning and Community Planning, assembly of land for regeneration, community cohesion and sustainability work, and more.

NILGA supports the development of a communication strategy that will seek to reduce instances of hidden homelessness and local government through its community planning structures is very well placed to raise awareness and understanding in this regard.

With most of these actions, a shared and open approach to data collection and use is key to ensuring that responsive approaches and services are developed and NILGA welcomes the inclusion of measuring and monitoring existing and emerging need as a key objective.

Like all of our member councils, NILGA looks forward to working in direct partnership with the NI Housing Executive to build robust and shared engagement, delivery and accountability and would reassert the need for properly co-designed performance mechanisms, together with a shared and open approach to data collection and use. The importance of engagement with service users and organisations representative must also inform service modelling on an equal footing to data.

NILGA welcomes that the document advises that the Social Housing Reform Programme is unlikely to have an impact on the scope of services provided by the current structures.

The Association also welcomes the recognition of a high degree of inter-agency cooperation to inform the development of a new strategic, intelligence-led approach to needs assessment. Through the councils localised area based working it is apparent that very often vulnerable people are provided with tenancies that they are in no position to sustain. More preventative approaches are key to achieving more settled and less insecure tenancies.

NILGA considers the Northern Ireland Housing Executive's Financial Inclusion Strategy's role to be key in mitigating against the impact of welfare reform as well as for those tenants that struggle to manage their finances. Housing advisors are well placed to engage at this level and it is reassuring that this assistance will be provided at the earliest point when someone is presenting as homeless regardless of tenure. Such preventative approaches are crucial in ensuring that what can often be a revolving door of homelessness is properly addressed.

NILGA also welcomes the Strategy's endorsement of the aims of 'Making Every Contact Count' and 'Addressing Complex Needs' and the recognition that there are a high number of people 'struggling with severe overlapping mental health, offending or substance misuse problems.' NILGA concurs that a multi-agency approach is fundamental to tackling chronic homelessness.

NILGA fully supports the Local Action Plan approach being proposed and the Housing Solutions and Support Team structures that will seek to forge relationships with statutory, voluntary and community sector colleagues working within their local area.

NILGA urges that formal, decision taking level linkages with community planning partnerships and structures in each of the 11 councils will provide an effective means of fostering and enhancing multi-agency approaches.

Specific Comments

NILGA supports Objective One and agrees that prevention is key in terms of the human, social and business case for ending homelessness. The three main areas of prevention work that the strategy intends to focus on are well thought out and comprehensive in their approach.

Objective Two is welcome in its recognition of the extreme vulnerabilities of clients that despite best efforts, will still find themselves in this situation. It is heartening to know that any solutions will be built around the person which NILGA agrees must be the case if clients are to succeed in sustaining a tenancy in the long term. It is also testimony to the commitment displayed in the strategy that the support of the Housing Solutions and Support Teams will be made available to any household that is homeless or that approaches the Housing Executive or other partner agency with any housing problem. NILGA agrees that this approach is key to finding the right solution for a household first time. We also welcome the assurance provided that the Housing Solutions and Support approach will not impact on the rights of a household under the law, but will run in tandem with any necessary homelessness assessment.

NILGA concurs that the success of this approach is entirely dependent upon the right services being available in the right place and at the right time to meet the needs of the household if they are to succeed in creating a sustainable accommodation solution. Local government through its community planning structures is very well placed to help foster better links with partner agencies, and to collate, analyse and forecast plan data. However, councils need to be involved at the start of such a key data exercise.

NILGA is unclear of what the other housing options section contained in the consultation will fully mean in practice. The section considers the Housing Executive meeting its duty to homeless applicants on a tenure-neutral basis. It is further advised that in doing so, this could include discharge into suitable private rented sector accommodation. However, it is unclear just how far this consideration may go and it is quite ambiguous in that it refers to homeless applicants. NILGA seeks clarification if this will include full-duty applicants.

Regarding Objective Three, NILGA supports the further development of the "Housing First" NI pathway model which seeks to take chronic homeless households straight to permanent housing with wrap around support. In particular, the Association supports the intention of this strategy to examine the potential for other types of housing led pathway models and examine existing Outreach Models that provide services to rough sleepers.

The Association also welcomes the measures to extend the focus on the development of mechanisms to quantify street activity outside of the two main cities which again councils are well positioned to assist in.

Regarding homelessness as it affects individuals and families who have no recourse to public fund (NRPF), and in particular asylum seekers. NILGA welcomes the clear commitment of the Strategy to address homelessness among those who do not qualify as full duty applicants, and to ensure 'the provision of appropriate support services to assist all homeless households to find and sustain long term housing solutions'.

NILGA supports the emphasis within the strategy on data gathering to provide an evidence base on the extent of the issue of NRPF clients and using this information to inform policy decisions. Given the role of NIHE in the provision of accommodation to asylum seekers through the COMPASS contract, we believe that data collection should be a straightforward exercise in relation to asylum seekers at risk of destitution.

NILGA shares the Northern Ireland Strategic Migration Partnership's views that the section of the Strategy (currently section 4.3.4), which focuses on the detail of NRPF must be updated to include provisions from the Immigration Acts of 2014 and 2016 which are due to be rolled out in Northern Ireland later this year. It is our understanding that these provisions include changes to support for refused asylum seekers and immigration checks by landlords on tenants.

Objective four relates to the mechanisms to oversee and deliver the Strategy. NILGA welcomes the implementation of a Homelessness Strategy Steering Group, chaired by the Department for Communities. The further layer of Local Inter Agency Homelessness Strategy Delivery Groups is a welcomed local level structure. The publication of an Annual Report on the progress of the delivery of the actions associated with this Strategy appears reasonable in terms of delivery and accountability.

NILGA fully agrees that the development of Local Action Plans which address the specific issues and needs of local communities in all their diversity are an essential element in delivery of the vision of this Strategy. Local Government is eager to link in at this level through the community planning structures and approaches already co-designed and currently being consulted on. It will be important that SOLACE & NILGA, the regional bodies for (i) senior officers and (ii) the corporate Councils, advise NIHE as to the specific professional officers and political leadership which could provide input in these important measures.

NILGA supports the Housing Solution and Support Teams approach and commends recognition of a holistic approach, which identifies both housing and support needs at the first point of contact. NILGA also advocates how essential robust evidence will be to the success of this Strategy.

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