

Public Consultation

Chronic Homelessness Action Plan

Please use this consultation template for submitting your responses and comments.

Alternatively, the online consultation can be downloaded at <https://www.nihe.gov.uk/Working-With-Us/Partners/Consultations> where you can also view the full consultation report and the associated screening documents.

If you are completing an electronic version of this form, it should be emailed to: homelessness.strategy@nihe.gov.uk.

Alternatively, you can return hard copies of the completed form to:

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The Housing Executive welcomes any comments you wish to make on all of the proposals or just on those issues that are of particular interest to you in the consultation.

All responses should be received by 5pm on Friday 2nd August 2019 to ensure they can be fully considered.

Freedom of Information Act 2000

Confidentiality of Consultations

The Housing Executive will publish a summary of responses following completion of the consultation process. Your response, and all other responses to the consultation, may be disclosed on request. The Housing Executive can only refuse to disclose information in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this consultation.

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<http://www.informationcommissioner.gov.uk/>)

YOUR DETAILS

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Criteria for Chronic Homelessness

The Housing Executive has provided criteria to identify the number of individuals/households experiencing chronic homelessness. Do you agree with these criteria? Please choose yes or no below.

No

Please provide any supporting comments below. In particular we are keen for the consultation to explore whether there are too many or too few criteria and whether the criteria need to be further defined and we would welcome any comments relevant to these points

While broadly welcoming the criteria it is imperative that it can be applied, and that it is an operational definition of chronic homelessness (Feantsa, 2010). The current draft criterion has a risk of not being implementable due to, on the one hand, the narrowing of eligibility, and on the other, the potential for subjective interpretation.

Chronic homelessness is typically understood to be those who have experienced homelessness for more than 12 months and have additional needs (typically a medical condition), yet the current criterion requires someone to meet three (not just two) conditions.

Extern recommends that the timeframe be reduced and that the requirement changed from someone needing to meet three of the criteria to having to meet only two.

The Government of Ireland's 'Housing First National Implementation Plan 2018-2021' report recognises someone as experiencing chronic homelessness if they have spent more than six months out of the past twelve in supported temporary accommodation (2018).

Similarly, the Canadian Government, in their 'Homelessness Partnership Strategy, 2014-2019' recognises that people who have been in a "shelter or place not fit for human habitation" for more than six months (or equivalent number of days over a 12 month period) are chronically homeless.

Expanding the criteria may in fact not increase the numbers; however, it should allow for more reliable, and less subjective, measuring.

Objective One

Do you agree with objective one which is to 'Design specific criteria for measuring chronic homelessness and implement data collection arrangements'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

See note above re: definitions. There is also a greater urgency needed and as such this objective should be completed in a tighter timeframe.

Do you agree with the actions in objective one? Please choose yes or no below.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

There is need for greater urgency, this objective should not extend over the three years of the plan. As estimated in the document, there are possibly 1,100 to 2,200 people experiencing chronic homelessness. It should be achievable over the lifetime of the plan to provide accommodation for this population and to eliminate chronic homelessness.

Objective Two

Do you agree with objective two which is to 'Introduce mechanisms to monitor and report on chronic homelessness trends'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

Do you agree with the actions in objective two? Please choose yes or no below.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

[Click here to enter text.](#)

Objective Three

Do you agree with objective three which is to 'Utilise chronic homeless data and trend information to identify existing and emerging needs to address chronic homelessness in the context of legislation, policy and service provision'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

Do you agree with the actions in objective three? Please choose yes or no below.

No

Please provide any supporting comments below:

Include 'prevent' in the Objective, as follows: 'Utilise chronic homeless data and trend information to identify existing and emerging needs to address, and prevent, chronic homelessness in the context of legislation, policy and service provision'

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

The impact of loss of mitigation payments, and the subsequent 'cliff edge' this may cause in 2020, needs to be examined in depth. Individuals and families will more than likely become homeless as a result of these policy changes. Extern, as a member of the Cliff Edge Coalition, submitted the following to the Joint Inquiry into Welfare Reform in Northern Ireland:

https://www.housingrights.org.uk/sites/default/files/Cliff_edge_NI_Coalition_response_westminster_inquiry-welfare-policy-NI.pdf.

Objective Four

Do you agree with objective four which is to 'Develop mechanisms across agencies for early identification of those who are at risk of homelessness or chronic homelessness'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

Do you agree with the actions in objective four? Please choose yes or no below.

No

Please provide any supporting comments below:

The majority of people become homeless due to affordability. There needs to be regular reviews of the number of people excluded from housing support (including FDA), delays in payments, and payments not keeping pace with market rents in the private rented sector (PRS).

Clear actions are required to prevent people becoming homeless as a result of increasing rent costs and static housing payments. Monitoring rent increases and levels of payments will act as mechanisms for early identification of those at risk of homelessness.

An early indicator that someone is at risk of chronic homelessness is if they are 'stuck' in emergency accommodation. An early warning system should be developed based on the number of days a person/family is in temporary accommodation.

Preventing chronic homelessness requires moving people out of emergency accommodation before they become entrenched. While there is a specific objective in this plan to 'Make the stay in temporary accommodation as short as possible', it should also be noted here.

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

Youth/young adult population:

Research from Canada (Gaetz et al, 2018) highlights that tell-tale signs of future chronic homelessness are evident among the youth/young adult homeless cohort. To prevent chronic homelessness intervention is required earlier. A mechanism needs to be put in place for early identification of young people (up to 25 years of age) who are experiencing episodic homelessness as they are at serious risk of future chronic homelessness.

Gathering information from services provided to individuals and families affected by substance use, mental health, in-crisis – all of which have an impact on tenancy

sustainment/ability to pay rent/mortgage – will assist in the early identification of those at risk of homelessness and chronic homelessness.

Extern provides a number of supports including Alcohol Housing Support, the Reach Out mental health and wellbeing project, crisis intervention services, family support programmes, Looked After Children support programmes, early years programmes, and empowerment programmes. These services could provide early warning alerts.

Extern welcomes the inclusion of communicating ‘a positive message to the public on how they can assist’ and believes the involvement of people with direct experience of chronic homelessness, and community and voluntary sector organisations, should be key actors in achieving this objective.

RE: reference to begging:

Remove reference to promoting the giving of money to charity rather than a person begging, this is a moral judgement.

RE: final action (page 35). In the process of preventing homelessness individuals, in particular children, cannot be placed at risk:

There is a need to include a specific reference to the protection of victims of abuse and those at risk of abuse. An abusive partner or child cannot be kept in the home to the detriment of others in the household.

Objective Five

Do you agree with objective five which is to ‘Implement a range of support services to help people sustain their accommodation including floating support and tenancy sustainment’? Please choose yes or no below.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

Do you agree with the actions in objective five? Please choose yes or no below.

No

Please provide any supporting comments below:

A comprehensive set of actions to address poverty, social exclusion, loneliness, and isolation needs to be urgently developed and included under this objective. Many people who have experienced homelessness, and in particular chronic homelessness, have low levels of ‘social capital’ and need support in accessing

employment and social activities. Initiatives like Extern Works (Belfast) and Positive Learning (Derry-Londonderry) are examples of how someone can be provided with employability skills. Funding and support to engage in social activities including sporting clubs should also be explored.

There is a need for a variety of tenancy support services from basic/light to more intensive intervention with appropriately trained teams to support people with: substance misuse, mental health (diagnosed and undiagnosed), physical health, family issues, and learning disabilities.

Extern provides a number of supports including a variety of floating support programmes, Alcohol Housing Support, the Reach Out mental health and wellbeing project, crisis intervention services, family support programmes, early years programmes, and empowerment programmes. An engagement process needs to take place to assess necessary expansion of services that support people to maintain their tenancies.

RE: 'Strategy to ensure delivery of a successful Private Rented Sector (PRS) Access Scheme' and 'Explore options and methods by which landlords can be incentivised ...':

Over-reliance on the PRS will result in inflated housing costs for all households, and this will be most acutely felt by those in receipt of assistance payments (see: <https://www.svp.ie/hapmakingtherightimpact>). A balance needs to be struck in providing housing solutions through the PRS, leasing, public housing, and the community and voluntary sector. In addition, there is evidence that PRS landlords are resistant to providing accommodation to people who are homeless (Watts and Fitzpatrick, 2016), which makes it increasingly difficult for people experiencing chronic homelessness to access PRS.

Alternatives:

There is a need for greater emphasis to be placed on identifying 'voids' within the current public housing stock, as well as vacant private houses, which could then be provided to C&V sector organisations to renovate and house an individual/family experiencing chronic homelessness (for example Extern Homes).

Extern Homes currently has grant aid from Landaid, a grant-awarding body to refurbish such properties, in order to rent them out to young people who are homeless. This proposal is based on leasing unused/hard to rent properties from property owners on a long-term basis, injecting much-needed capital to bring them up to standard, and then renting them to young people coming from homelessness/care backgrounds.

To prevent children and young people from entering traditional emergency accommodation a scheme similar to Host Homes (Canada) or Nightstop (UK) should be developed. These programmes involve accommodating children and young people in their communities with host families. This service would 'dovetail'

very well with the Intensive Support Fostering Scheme that is provided in partnership with Extern, the Regional Adoption and Fostering Service, and the Trusts.

In addition, there is a need to explore expanding the use of 'time out' for young people to create space and allow for re-engagement with parent/guardian. Extern, working in partnership with social workers, provides a time out service to young people in crisis, offering a sanctuary which is a safe place where they can reflect and feel valued.

Concerns around 'shared living':

The use of shared accommodation for someone who is a substance user will present serious difficulties, particularly in the private rented sector.

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

See comments above

Objective Six

Do you agree with objective six which is to 'Implement arrangements to ensure services engage with people at risk of chronic homelessness as quickly as possible'? Please choose yes or no below.

No

Please provide any supporting comments below:

'As quickly as possible' is not a strong enough commitment, maximum time frames need to be committed to and included here.

Do you agree with the actions in objective six? Please choose yes or no below.

No

Please provide any supporting comments below:

This objective should also include 'engage with people who are chronically homeless'.

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

While welcoming the idea of a Homeless Access Hub, there is a need to engage with 'hard to reach individuals'. To prevent chronic homelessness among hard to reach groups there is a need to engage people in the public space as well as substance users.

Extern provides a range of outreach services to substances users to access temporary accommodation and drug services, including the Street Injectors Support Service, the Drugs Accommodation Support Project, the Dual Diagnosis Street Team, and the Multi-Disciplinary Homeless Support Team. An engagement process needs to take place to assess necessary expansion of services that support people to maintain their tenancies.

Preventing chronic homeless in the youth/young adult population – engage more with young people currently experiencing episodic homelessness:

There is a need to respond more effectively to episodic youth homelessness (up to aged 25) and stop the use of institutional style accommodation (including hostels). (This recommendation could also go under Objective One).

Engaging with children and young people who have histories of Adverse Childhood Experiences.

Further expansion of services provided to individuals and families affected by substance use, mental health, in-crisis, all of which have an impact on tenancy sustainment/ability to pay rent/mortgage. Extern provide a number of supports including Alcohol Housing Support, the Reach Out mental health and well-being project, crisis intervention services, family support programmes, Looked After Children programmes, early years programmes, and empowerment programmes.

Objective Seven

Do you agree with objective seven which is to 'Make the stay in temporary accommodation as short as possible'? Please choose yes or no below.

No

Please provide any supporting comments below:

A maximum time that someone will spend in temporary accommodation needs to be set.

Do you agree with the actions in objective seven? Please choose yes or no below.

No

Please provide any supporting comments below:

There needs to be a commitment within this strategy to maximum times that someone spends in temporary accommodation. In order to prevent someone from becoming entrenched in shelter accommodation there should be a maximum stay of six months. Unfortunately, the average stay in voluntary sector hostels is 38 weeks, and for some it has been years; this is despite it often costing more. A

2008 'Evaluation of Homeless Services' in Ireland, by the Homeless Agency, identified that after isolating accommodation costs, the private rented sector was less expensive than hostel accommodation. Hostels are also, typically, an environment which even the healthiest person would find difficult to cope in, as they are unhomelike conditions and they often cause personal difficulties to worsen (Homelessness Oversight Group, 2013).

For the small minority that need some form of sheltered accommodation this needs to be provided in small, homelike, units with on-site support (see comments under Objective Eight).

Actions under this objective should provide funding for housing support workers in hostels whose sole focus is to move people into permanent homes.

Over the lifetime of the strategy homeless hostels should be ear-marked for closure.

Re: 'Rapid Re-housing', the plan needs to be more ambitious and include figures for the numbers that will be housed. It should not be considered unrealistic that over the lifetime of this plan the majority of the 1,100–2,200 experiencing chronic homelessness are re-housed.

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

[Click here to enter text.](#)

Objective Eight

Do you agree with objective eight which is to 'Consider a range of housing options for the chronic homeless including Housing First and ensure they are supported into permanent accommodation as soon as possible'? Please choose yes or no below.

No

Please provide any supporting comments below:

This objective needs to be clearer:

Such as: Drive a housing-led approach, which includes Housing First, for people experiencing chronic homelessness to ensure that they are supported into permanent accommodation as soon as possible and no longer than (give specific time frame).

Maintaining the fidelity of housing first is important, therefore there should be no suggestion that 'housing first' is a transition to permanent accommodation,

'housing first' is permanent accommodation. Other housing-led services, including Extern Homes, which provides accommodation on a short-medium length tenancy agreement should also be promoted as a tool to move people out of homeless, in particular people experiencing chronic homelessness and the cyclical nature of moving from hostel to hostel.

Do you agree with the actions in objective eight? Please choose yes or no below.

No

Please provide any supporting comments below:

Change 'What we will do now' with text from 'What can be done with more resources'. Remove any and all references to 'investigate the feasibility of the provision of additional services including Housing First', there is overwhelming evidence that it is proven to work when its fidelity is maintained.

Noted earlier there needs to be a commitment to delivering a sufficient number of permanent homes to the majority of the 1,100–2,200 people experiencing chronic homelessness by the end of the plan.

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

For the very small number of people who, because of the current and past failures of public services, do not have the capacity for independent living, or do not wish to live independently, there may be a role for long-stay and permanent supported accommodation. One possible option is the model developed in Denmark, 'Skaeve huse' where people live in community, in one or two bedroom units which include a kitchenette, bathroom and access to common rooms. Each scheme has 8-12 dwellings and there is a permanent office on site with social care workers that provides low level 'floating support'; this is combined with individualised, more intensive support, by an appropriate agency when required (Meert, 2005).

Objective Nine

Do you agree with objective one which is to 'Promote interagency issues and actions required to address chronic homelessness'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

However, leadership is required (See comments under Objective 10)

Do you agree with the actions in objective nine? Please choose yes or no below.

Choose an item.

Please provide any supporting comments below:

[Click here to enter text.](#)

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

[Click here to enter text.](#)

Objective Ten

Do you agree with objective one which is to 'Ensure mechanisms in place to implement and oversee the implementation of the Chronic Homelessness Action Plan'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

Do you agree with the actions in objective ten? Please choose yes or no below.

No

Please provide any supporting comments below:

To eliminate chronic homelessness there is a need to establish a high-level team of senior officials, who have the authority to command and coordinate the necessary actions required from the various agencies involved. They should report directly to the Minister for Communities (within the current political deadlock, representatives of the main political parties and the Permanent Secretary).

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

[Click here to enter text.](#)

Please provide any further comments you may have on the Chronic Homelessness Action Plan below:

There is need for a greater urgency, this objective should not extend over the three years of the plan. As estimated in the document, there are approximately 1,100 to 2,200 people experiencing chronic homelessness.

The Vision of 'Homeless Strategy for Northern Ireland 2012–2017' was to end long-term homelessness by 2020. In practical terms there is not much difference between long-term homelessness and chronic homelessness. What is substantively lacking in the current action plan is a clear objective (and timeline) to end chronic homelessness. The next three year plan should, incrementally, be able to end chronic homelessness, it is achievable.