



Federation Northern Ireland

## The Northern Ireland Housing Executive

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### A Response to: The Draft Homelessness Strategy 2011-16

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August 2011

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24 Hour Domestic Violence Helpline - 0800 917 1414

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## **Core Work of Women's Aid: Background Information & Statistics**

### **1.0 Introduction**

Women's Aid is the lead voluntary organisation in Northern Ireland addressing domestic violence and providing services for women and children. We recognise domestic violence as one form of violence against women. Women's Aid seeks to challenge attitudes and beliefs that perpetuate domestic violence and, through our work, promote healthy and non-abusive relationships.

### **2.0 Core Work of Women's Aid**

The core work of Women's Aid in Northern Ireland, including Women's Aid Federation Northern Ireland and the 10 local Women's Aid groups is:

- To provide refuge accommodation to women and their children suffering mental, physical or sexual abuse within the home.
- To run the 24 Hour Domestic Violence Helpline.
- To provide a range of support services to enable women who are leaving a violent situation to rebuild their lives and the lives of their children.
- To provide a range of support services to children and young people who have experienced domestic violence.
- To run preventative education programmes in schools and other settings.
- To educate and inform the public, media, police, courts, social services and other agencies of the impact and effects of domestic violence.
- To advise and support all relevant agencies in the development of domestic violence policies, protocols and service delivery.
- To work in partnership with all relevant agencies to ensure a joined up response to domestic violence.

### **3.0 Women's Aid Statistics (2009 - 2010)**

- 12 refuges with 300 bed spaces, playrooms and facilities.
- 1077 women and 854 children sought refuge.
- 15 resource centres for women seeking information and support; group work and training.
- 2,938 women and 3,617 children accessed the Floating Support service enabling women to access support whilst remaining in their own homes and communities.
- Move-on houses for women and children leaving refuges.
- In 2009/10 the 24 Hour Domestic Violence Helpline, open to anyone affected by domestic violence, managed 32,349 calls. This represented an increase of 17% on 2008/09.

### **4.0 Additional Women's Aid Statistical Data**

- Since 1999, Women's Aid across Northern Ireland gave refuge to 13,656 women and 13,602 children and young people.
- During the last 15 years Women's Aid Federation Northern Ireland managed 244,564 calls to the 24 Hour Domestic Violence Helpline.

### **5.0 Statistics: Domestic Violence & Violence Against Women**

- Domestic violence is a violation of Article 5 of the UN Universal Declaration of Human Rights – that “no one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment”;
- The joint NIO, DHSSPS Strategy “Tackling Violence at Home” estimates that the cost of domestic violence in Northern Ireland, including the potential loss of economic output, could amount to £180 million each year.
- UNICEF research released in 2006, showing per capita incidence, indicates that there are up to 32,000 children and young people living with domestic violence in Northern Ireland.
- Where the gender of the victim was known, 75% of adult victims of domestic crimes recorded by the PSNI in 2009/10 were female.\*
- Over 30% of all domestic violence starts during pregnancy. \*\*

## 6.0 Domestic Violence: Crime Statistics

- Domestic Violence is a crime. PSNI statistics for 2010/11 indicate that there were more recorded crimes with a domestic motivation (9,546) than the combined total of all the following crimes (9,471). These include all recorded sexual offences (2,120), robbery (622), armed robbery (562), hijacking (122), theft or unauthorised taking of a motor vehicle (2719), arson (1884) dangerous driving (699), handling stolen goods (194) and offences under anti-terrorism legislation (19).
- PSNI Statistics for 10/11 indicate that they responded to a domestic incident every 23 minutes of every day of the year.
- The total of 9,546 crimes with a domestic motivation in 10/11 represents an average of approximately 1 domestic crime every 60 minutes in Northern Ireland.
- The number of all recorded offences of murder in Northern Ireland in 10/11 total 20. Those classed as having a domestic motivation total 7. Therefore, 35% of all murders in Northern Ireland in 10/11 had a domestic motivation.
- There were 550 rapes (including attempted Rapes) in Northern Ireland in the period 2010/11.

(Source: PSNI Statistics 2010/11)

- Official sources (NISOSMC) estimate that up to 80% of sex crimes are not reported.
- Violence Against Women is not limited to domestic violence, it includes amongst other crimes murder, rape, sexual assault, sexual exploitation, trafficking, sexual stalking and sexual harassment.

(\*Findings from the PSNI Crime Statistics Report 2010/11 N.B. "Adult" defined as aged 18 and over)

(\*\* Women's Aid Federation NI)

## **7.0 Comments - Introduction**

- 7.1 Women's Aid Federation NI welcomes the publication of the Northern Ireland Housing Executive's Draft Homelessness Strategy 2011-16 and the opportunity to comment upon the document on behalf of our ten local groups. The following comments reflect their collective views.
- 7.2 Women's Aid Federation NI recognises and commends the significant progress outlined in implementing the Housing Executive's Homelessness Strategy since 2002 and the recognition given to the essential role of joint working with voluntary sector partners.
- 7.3 We would specifically highlight the successful establishment and operation of the 24-Hour Domestic Violence Helpline which contributes to the prevention of homelessness and which is funded by NIHE, together with DHSS&PS and the DOJ.
- 7.4 The introduction of a network of Floating Support services in 2002 was also highly significant and successful. The Floating Support services run by Women's Aid are essential to support victims of domestic violence and effectively contribute to sustaining tenancies and preventing homelessness.

## **8.0 Local Context – Legislation**

- 8.1 The consultation document states that, "The Housing Executive's statutory duty to homeless people is contained within the Housing (NI) Order 1988, as amended. This legislation requires the Housing Executive to assess the duty owed to homeless presenters in relation to eligibility for such services as temporary accommodation and permanent housing. The order also makes provision for the Housing Executive to financially assist voluntary sector organisations to provide a range of services to the Housing Executive in fulfilling its statutory duties." (Pg.11)
- 8.2 Women's Aid would seek clarification as to whether this duty extends to those individuals presenting as homeless, who have no recourse to public funds and would ask the Housing Executive how they are currently discharging their duties in this respect, particularly as it pertains to women with no or limited recourse to public funds, who require emergency support and accommodation as a direct result having experienced domestic and/or sexual violence?

- 8.3 We note that, “The Housing (Amendment) Act (Northern Ireland) 2010, placed a statutory duty on the Housing Executive to develop and publish a 5 year homelessness strategy and to provide advice and assistance on homelessness to the broader public free of charge.” (Pg.11)
- 8.4 We would ask for detail in respect of the specific nature and scope of the advice and assistance provided in this context.

### **Local Context – Financial Context**

- 8.5 The consultation document states that in conjunction with Supporting People, there will be, “a critical review of supported temporary accommodation services...completed, with a view to achieving maximum value for money whilst retaining sufficient emergency services for the most vulnerable. In addition, efforts will be made to reduce costs in the provision of private rented sector temporary accommodation by negotiating with existing landlords and by advertising for new providers.” (Pg.13)
- 8.6 It is the strongly held opinion of Women’s Aid that organisations such as our own and those in the wider Homeless Sector, are already very successful at providing value for money and that financial resources would be much better spent on the provision and sustaining of front-line services, rather than on the development and implementation of additional monitoring processes, to add to those already in existence.
- 8.7 We also have serious concerns regarding the emphasis placed throughout the strategy, upon the private rented sector for the provision of both temporary and permanent accommodation. These concerns broadly encompass affordability, suitability and sustainability.

### **9.0 Main Achievements Since 2002 – Permanent Accommodation**

- 9.1 Whilst our organisation acknowledges the considerable impact, particularly upon the housing market in Northern Ireland, of the changing economic circumstances and the consequent diminished ability of the Housing Executive to meet statutory needs through a combination of the Social New Build Programme and re-lets; Women’s Aid is of the view that the decision to focus on the private rented sector as a key component of addressing homelessness, represents a high risk strategy. (Pg.15-16)
- 9.2 The private rented sector is equally vulnerable to fluctuations in the housing market. An improved economic environment is likely to

place additional pressures on tenants both in respect of potential rent increases and security of tenure. Given the five year duration of this strategy and the on-going economic volatility and uncertainty, these are very real concerns.

- 9.3 Similarly, the difficulties experienced by many, particularly first time buyers in obtaining a mortgage, has made the private rented sector a highly competitive market.
- 9.4 There is also little evidence to indicate that the rent deposit guarantee scheme, whilst a useful initiative, has substantially increased the available stock of private rented accommodation in Northern Ireland.
- 9.5 We are also concerned that the private rented sector is not currently substantially positioned to provide suitable, affordable accommodation, for vulnerable and at risk individuals and for those with complex needs.

## **10.0 Targeted Services – Domestic Violence**

- 10.1 In the context of the Multi Agency Risk Assessment Conferencing (MARAC), the following statement is made in the document, “Central to the concept is for victims to be a willing participant in the process.” (Pg.21) This statement is incorrect. Victims of domestic violence can be referred to MARAC with or without their consent, in circumstances where high risk has been identified.
- 10.2 Women’s Aid is an active participant on the MARACs across Northern Ireland. As such, it is our view, that the stated figure of 20 cases per MARAC session (Pg.21) is an over-estimate and is not likely to be consistent throughout Northern Ireland.
- 10.3 We would wish to state that we strongly support the involvement of the Housing Executive in the MARAC process and believe that it is not only positive but essential.
- 10.4 We are however of the opinion that the Executive could do more in respect of providing housing solutions in the context of MARAC.
- 10.5 Whilst it is our experience that the vast majority of contributions made by the Executive, in MARAC meetings have been positive, we are concerned by reports that on a number of occasions the Executive has given the appearance of being focused on identifying potential Housing Benefit fraud. MARAC meetings must remain focused on identifying and addressing risk.

## **Sanctuary Scheme**

- 10.6 Women's Aid welcomes the Northern Ireland Housing Executive's involvement in the Sanctuary Scheme, which has made a positive contribution to the safety of a number of high risk victims of domestic violence.
- 10.7 We are however deeply concerned by the focus in the strategy on what appears to be an overly simplistic and distorted cost/benefit analysis, which states that the scheme produces savings, "either financial or non-financial in nature." (Pg.22)
- 10.8 Whilst the Sanctuary Scheme does have the potential benefits stated in the document, including enabling the individual and their children to remain in their own homes and communities and assisting them in maintaining their social and support networks; we feel strongly that it is entirely inappropriate to equate the cost of the scheme with that of providing temporary accommodation for a mother and child for one year.
- 10.9 The Sanctuary Scheme is not suitable in every circumstance, nor is it a viable alternative to the provision of and financial support for refuge accommodation in Northern Ireland.
- 10.10 From our experience over three decades of supporting women and children who have experienced domestic violence, we know that they can have a variety of needs, many of which can only be met in the context of the safe, secure and supportive environment afforded by our refuges, which enable women to re-build their lives and to live independently.
- 10.11 The Sanctuary Scheme and the provision of refuge accommodation should run in parallel, to afford as many options as possible for those who have experienced domestic violence.
- 10.12 We would also suggest that in many cases the provision of a generic alarm/security system within the home would prove to be beneficial.

## **Improved Services for Foreign Nationals**

- 10.13 In welcoming the Housing Executive's decision to undertake a comprehensive training programme on the complex issue of eligibility for

housing assistance (Pg.23) we would suggest that this training should be extended to providers.

10.14 We would also welcome greater detail on the assistance which the Housing Executive can provide where homeless households have no recourse to public funds. (Pg.23)

10.15 Women's Aid would once again wish to emphasise the plight of women with no or limited recourse to public funds who have experienced domestic and/or sexual violence and who are often rendered homeless and destitute as a direct result of attempting to escape violence and abuse, or who have no alternative but to remain dependent upon their abuser.

10.16 Our organisation remains willing to offer support to these women. However, the current financial implications are unsustainable. This is a pressing problem for organisations such as our own and is particularly acute in light of the recent publication of Supporting People Guidance, which prohibits the use of these funds to support migrant workers with no recourse to public funds.

## **11.0 Strategic Objective One – To Place Homelessness Prevention at the Forefront of Service Delivery**

### **Assessment**

11.1 Reference is made in the strategy to the Multi-Disciplinary Homelessness Support Team (MDHST). (Pg.28) Women's Aid would welcome greater detail on this body and believe that more publicity is required regarding the functions of the Team and the design and application of the Belfast model.

11.2 We would also seek information on the membership of the PSI Health Sub-Group and would suggest that organisations such as Women's Aid should be consulted in the development of holistic assessment services outside Belfast.

### **Advice and Assistance - Internal**

11.3 We note that local staff are, "trained to provide advice to those experiencing problems ...and to signpost to specialist agencies where complex problems exist," (Pg.28) our groups report that there is little evidence of this referral process taking place in the context of the women we work with.

- 11.4 It is essential that local staff engaged in providing advice to the public, are afforded the opportunity to engage in domestic violence awareness training.
- 11.5 Women's Aid is of the opinion that more detail is required in respect of Personal Housing Plans and there is a requirement for much greater public awareness of these schemes and services.
- 11.6 Once again we are concerned by the focus on the private rented sector and on linking Personal Housing Plans to the rent deposit guarantee scheme.
- 11.7 Participation in this scheme results in the loss of an individual's homeless status, which we believe is a fundamental flaw, particularly as they are then placed in the private sector with the prospect of more vulnerable tenure.

### **Advice and Assistance – External**

- 11.8 We can see considerable merit in the development of online housing support. However, this scheme needs to be promoted to the wider public.
- 11.9 Cognisance should also be taken of the needs of those who may struggle to access this type of service including the elderly and we are also unsure how such a service would provide assistance to those with complex needs.
- 11.10 Women's Aid welcomes the Housing Executive's continued support for a service which ensures local advice agencies are kept up to date with legislative and policy developments and would suggest that this should be extended to providers.

### **Tenancy Sustainment**

- 11.11 In respect of the provision of money advice, we are concerned by the emphasis on planned referrals to Citizens Advice Bureaux for more complex cases.
- 11.12 The CAB provides an excellent service but like many voluntary and community sector organisations, is already dealing with overstretched resources in an environment of funding cuts. Additional referrals to the service are likely to increase the pressure on resources which need to be considered.
- 11.13 It is essential that the strategy for providing financial advice to tenants is rigorous. This is particularly important in the context of a

strategy which places considerable emphasis on the private rented sector.

- 11.14 Our experience is that many tenancies in the private rented sector tend to fail due to financial pressures.
- 11.15 In the context of anti-social behaviour, we would urge the Housing Executive to be rigorous in their scrutiny of such cases to ensure that there is no evidence of underlying issues such as domestic violence.
- 11.16 Women's Aid has observed very few referrals to our services from the Housing Executive's Floating Support, aimed at sustaining failing tenancies.
- 11.17 Once again, we would recommend that staff receive domestic violence awareness training and that they should be encouraged to signpost to our services wherever and whenever necessary.

### **Homelessness Prevention in the Community**

- 11.18 The strategy document refers to "community awareness and training of local networks." (Pg.31) We would suggest that this training should be extended to providers.

## **12.0 Strategic Objective Two – To Reduce the Length of Time Households Experience Homelessness by Improving Access to Affordable Housing**

### **Future of Temporary Accommodation**

- 12.1 Page 33 of the document states that, "Evidence suggests that some homeless households could live independently with lower level floating support are inappropriately placed in higher cost supported accommodation."
- 12.2 Once again it is notable that no reference is made to the specific evidence cited. Women's Aid would strongly contend that the issue is the time spent in supported accommodation rather than inappropriate placement.
- 12.3 Women's Aid thoroughly assesses the appropriateness of placement within our refuges, upon entry.
- 12.4 We note that one of the next steps proposed is a complete and fundamental review of the temporary accommodation portfolio following publication of commissioned research into its strategic relevance and financial viability. (Pg.33)

- 12.5 To date Women's Aid has not been approached to participate in this process. We would welcome an opportunity to do so.
- 12.6 We have also not been afforded an opportunity to engage with the Area Homelessness Action Planning process. This is particularly disappointing given the contribution our organisation could make to the development of localised temporary accommodation and support plans in conjunction with Supporting People, as part of this process.
- 12.7 The strategy makes reference to a new procurement process for self-contained private rented sector accommodation. It remains the view of Women's Aid that in addition to private sector requirement, there is a manifest need for a social landlord.
- 12.8 There is also an absence of capital which would afford the opportunity for the voluntary and community sector to explore the development and provision of single unit accommodation.

#### **Permanent Accommodation**

- 12.9 Our organisation would question the assertion that the support offered to landlords participating in the rent deposit guarantee scheme will incentivise landlords to make properties available at or around Local Housing Allowance levels.
- 12.10 Buy to let landlords will still have a financial imperative in respect of discharging their mortgages. Combined with a competitive rental market, this is likely to have a much greater impact on the level of rent requested.
- 12.11 We strongly agree with the statement contained in the document that, "The proposed changes to Housing Benefit under the Welfare Reform Agenda, coupled with the economic downturn, may have a significant impact on the ability of a number of key groups to access affordable and appropriate housing." (Pg.34)
- 12.12 Similarly we are very concerned by the extension of the Single Room Rent to those under 35 years of age and fear that this is highly likely to place vulnerable and at risk individuals in wholly unsuitable accommodation.

#### **13.0 Strategic Objective Four – To Improve Services to Vulnerable Homeless Households**

## **Domestic Violence**

- 13.1 Women's Aid welcomes the commitment from the Housing Executive to assist all relevant agencies in the aim of eliminating domestic violence and abuse and the successful partnership work between the Housing Executive and Women's Aid which has developed.
- 13.2 We particularly welcome the continued commitment to fund the 24-Hour Domestic Violence Helpline and the recognition of its value in preventing homelessness amongst victims of domestic violence.
- 13.3 In respect of the next steps outlined on Pg.40 of the strategy document, it is the view of Women's Aid that the failure to recognise the need to address the issue of individuals with no recourse to public funds that have experienced domestic violence represents a significant omission.
- 13.4 Similarly, we are extremely concerned by the absence of any plan in respect of refuges and identifying existing gaps in service provision.
- 13.5 There is also no discussion of homeless children in the context of domestic violence, which is an area which has been subject to a lack of essential funding.

## **Women Offenders**

- 13.6 One of our Women's Aid groups is engaged in the on-going provision of accommodation of women who have experienced domestic violence and are released on Bail, Probation or as a result of time spent.
- 13.7 Women's Aid has played a key role in their rehabilitation and in rebuilding their lives, working in conjunction with other agencies. We would therefore strongly contend that any analysis of need and Accommodation Strategy for Ex-offenders should be developed in consultation with our organisation and others in the voluntary and community sector that have experience of providing support.

## **Rural Homelessness**

- 13.8 We remain concerned by the lack of access to social housing available in rural areas in Northern Ireland. This has had consequences for a number of women attempting to move on from Women's Aid refuge accommodation.

13.9 It is essential that the impact of domestic violence is fully assessed when attempting to measure the extent of rural homelessness.

13.10 Women's Aid would also welcome the opportunity to explore the possibility of acting as a conduit for user feedback.

### **Youth Homelessness**

13.11 We would seek clarification on the process of dissemination of the findings of the analysis of youth homelessness carried out by the Council for the Homeless.

13.12 Women's Aid would also request sight of the protocol for 18-25 year olds.

### **14.0 Additional issues**

14.1 Women's Aid is extremely concerned to note that there is no reference in the strategy to older people and homelessness. This is particularly pertinent in the current economic climate which has seen many older people struggle with pensions and the consequences of equity release schemes and debt.

14.2 Women's Aid is concerned by the impact of elder abuse, which can be characterised by financial exploitation, which at the height of the property market saw many individuals feeling pressured into selling land and property, often by family members.

14.3 Our organisation is also of the view that there is an urgent need to explore the development of a "wet hostel" for women in Northern Ireland.

For further information about this response please contact:

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