

Housing Executive

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

Alternatively, the online consultation template can be downloaded at:
<http://www.nihe.gov.uk/index/corporate/consultation.htm> 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:

Richard Tanswell,
Homeless Strategy Manager
The Housing Centre
2 Adelaide Street
Belfast BT2 8PB

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 Wednesday 8th February 2017 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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Acceptance by the Housing Executive of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner. For further information about confidentiality of responses please contact the Information Commissioner's Office (or see the website at: <http://www.informationcommissioner.gov.uk>)

YOUR DETAILS (All answers to be provided in grey boxes)

Organisation: Women's Aid Federation Northern Ireland

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1. Vision Statement "Ending Homelessness Together"

a) Do you agree with the vision statement of this Strategy?

Yes No

Please provide any supporting comments below

We are supportive of a cross-departmental and inter-agency approach. Cross departmental and inter-agency approach to ending homelessness needs to ensure that the skills and knowledge of all partners are equal within the process.

It would be useful if the vision recognised that homelessness is imposed by peoples individual circumstances and exacerbated by current housing stock, and specifically named a commitment to addressing both these things.

b) In your view what are the key priorities required to end homelessness

* Understanding need and tailoring services to meet that need.

* Ensuring proper assessment of, and response to, differing levels of provision on a geographical basis.

* Understanding that homelessness is more than not having a roof over one's head and that it will only be tackled effectively if the complex, multi-faceted root causes of homelessness are addressed.

* Improving housing stock based on existing and projected need.

* Increasing prevention interventions (Floating Support), which must be client-specific as generic interventions will have limited success.

* Ensuring that the move towards Outcome-Based Accountability does not impose generic gauges of success, which reduce specialism in the sector and will lead to poorer outcomes long term.

2. Objective One: Preventing Homelessness

a) Do you agree that preventing homelessness should be the primary objective of this Strategy?

Yes No

Please provide supporting comments below:

Domestic violence is slightly different from other circumstances that lead to homelessness, in the sense that sometimes it is a better outcome to leave the home and be homeless than to remain in an unsafe home. So, while preventing homelessness should be the primary objective of this strategy, it should not be interpreted so simply as to assume that keeping someone in their home at all costs is necessarily a positive outcome.

Remaining safely in a current home is of course the ideal for women and children. And where that is possible, the Floating Support system is excellent at providing support while preventing homelessness.

In terms of preventative work for those suffering domestic violence or vulnerable to abuse, this would tie in with an early intervention approach to abuse. For example, actions to increase a victim's ability to maintain or regain their social networks and support. Preventative work also allows for proper assessment of risk and response to same. However, for domestic and sexual violence it has to be accepted that there are incidences where it cannot be prevented, and it is important that this strategy is flexible enough to understand this.

b) Do you agree with the actions outlined in the Strategy aimed at preventing homelessness?

Yes

No

Please provide supporting comments below

While we agree with the principle of pre-crisis intervention, it should be understood that this is not always possible in cases of domestic & sexual violence.

We are also supportive of the Housing Solutions and Support approach, and welcome its roll out across Northern Ireland. Our staff in areas where it has been piloted have spoken very positively of it, and have confirmed that the pilot has had positive results for both staff and clients.

Staff report that the Housing Solutions and Support approach has a number of advantages. They found that it fostered more effective and meaningful cooperation and collaboration between NIHE and Women's Aid support staff; it was more effective in addressing complex issues faced by a client; it reduced situations in which a client felt re-traumatised by having to tell their story unnecessarily; it was more needs focused in the sense that some clients need some extra TLC and going straight to the team instead of starting again at the beginning of the process was more suited to their needs and issues.

c) In your view, what further actions could be taken to prevent homelessness?

In situations where a domestic violence victim has had to flee NIHE accommodation to escape abuse, it would be useful to consider a policy of removing the perpetrator from that NIHE property within a 12 week period maximum to allow the victim (and children) to return. This policy should be applied in every instance where it is safe to do so.

3. Objective Two: Finding appropriate and sustainable housing and support solutions?

a) Do you agree with the person centred housing and support solution approach as detailed in the Strategy?

Yes No

Please provide supporting comments below

In terms of appropriate and sustainable housing and support solutions, there are some shortcomings with the current process. Although having private sector landlords, Housing Associations and Smart Move as options do lead to quicker solutions, they are not always the most appropriate solutions for some clients. Victims of domestic violence are a diverse group with differing needs, but for those whose family networks live on estates with NIHE houses, their need is often for a house on that estate. Domestic violence victims who have left their abuser will need emotional support, practical support like childminding from a parent who is nearby, and to feel that they are safe from their abuser. This feeling of safety comes from living in a place that is familiar to them, surrounded by friends and family.

There are added issues around security of tenure and provision of necessary support from landlords. For example, if someone has left an abuser and moved into new home, their need may be for some long-term stability. This might also be a concern for their children, who will have been affected by domestic violence in the household, as well as the upheaval of fleeing the home. Unfortunately, many private landlords do not offer the long-term tenancies that would be available from NIHE housing. A further issue arises from the daily reality of surviving abuse, in that it does not necessarily end when a victim flees the relationship. Women are often faced with their abuser turning up on their doorstep, damaging the house, acting in what would be perceived by neighbours and landlords as an 'anti-social' manner. While the NIHE are a very supportive landlord in such cases, this is not often the case with private landlords, who will not fix damage without payment from the victim and may refuse to extend the tenancy because of noise complaints etc. In these cases it is the victim who is penalised for the actions of their abuser. We recommend that these considerations are taken into account when assessing the use of the private rented sector.

b) Do you agree with the actions outlined in the Strategy aimed at finding person centred solutions and ensuring the right support services are in place to support this?

Yes No

Please provide supporting comments below

We support this aim provided that the person-centred solutions and support services are geared towards addressing the reason for homelessness and not just the homelessness itself. For instance, domestic violence makes women homeless. What those women need is specialist service and support that can respond to domestic violence and homelessness, not a generic service that finds them a house. This will also be true for a range of client groups who fall under homeless sector.

c) Do you agree that a multi-agency approach is required to find appropriate housing and support solutions for homeless clients?

Yes No

Please provide supporting comments below

As the reasons for homelessness are often multiple and complex, it follows that several specialist support services may be required for any given client. Furthermore, based on a client's assessed individual need, they may need different services at different times. Therefore multi-agency approach, where effective collaboration and coordination are built in, is the only effective means of tackling homelessness and its root causes. The combined skills and knowledge available in across statutory and community/voluntary sector support agencies can lead to better outcomes. Furthermore, when NIHE engages with support organisations who may know and understand the needs of a client or certain important aspects of their lives, NIHE staff better understand the needs and risks of clients that cause their homelessness.

d) Which agencies, in your view, have a key role to play in finding sustainable solutions for homeless households?

Where domestic violence is a factor in homelessness, NIHE, Housing Associations, PSNI, Women's Aid, Social Services all have a key role .

e) In your view, what further actions could be taken to find sustainable housing solutions for homeless clients?

Important actions would include future proofing for an ageing population, and developing housing stock to meet current and projected need, particularly by increasing the numbers of 1 and 2 bed accommodations available.

4. Objective Three: Understanding and addressing the complexities of chronic homelessness and rough sleeping?

a) Do you agree that further work is required to understand and address chronic homelessness and rough sleeping?

Yes No

Please provide supporting comments below

Page 20 of strategy points to mental health and addiction needs as reasons why some people disengage with services or 'choose' to sleep rough. This does not necessarily provide a complete picture of why people sleep rough. Often those who sleep rough do so because they feel it is the safest of all the options they are presented with. Addictions are a very real problem, and an addiction cannot be labelled as a 'choice'. If there isn't a bed that also facilitates the realities of a person's addiction, they are unlikely to take it in the longterm and will sleep rough instead.

No Recourse to Public Funds issues relating to domestic violence: More needs to be done to ensure that restrictive rules relating to no recourse do not end up penalising victims of domestic violence and their children who leave an abusive relationship. Where an applicant has no recourse but they are destitute and have a pre-existing care need [a preexisting care need –should be similar to the priority need categories outlined in Article 5 of the '88 Order], they may be referred to Social Services under the Health & Personal Services (NI) Order 1972. In the same way, the Health and Social Care Trusts have a duty under the Children (Northern Ireland) Order 1995 to provide services for persons under 18 who are children in need. Therefore, a referral will be made to the relevant Health and Social Care Trust in such instances. If a mother does not fit the first criteria, and the child can be supported through second, then there needs to be a policy change to ensure that this does not lead to separation of mother and child. This issue has arisen before, where for example Social Services have warned that if the mother left refuge then they would meet her at the gate and take her child. This is a difficult position for a housing service provider like ourselves, who are not funded to support those with no recourse in refuge, yet strongly feel that it is in the best interests of neither mother nor child for them to be separated in this manner. We urge that more coherent policy is put in place to allow for proper planning and support for women in this position. For example, the cost incurred to housing providers should be agreed for a minimum of a 3 month period to allow for better planning.

b) Do you agree with the actions outlined in the Strategy to address chronic homelessness?

Yes No

Please provide supporting comments below

c) In your view, what further actions could be taken to address chronic homelessness?

See above.

5. Objective Four: Overseeing and delivering the Homelessness Strategy

a) Do you agree with the inter-departmental and local approaches to overseeing and delivering the Strategy as outlined in the document?

Yes No

Please provide supporting comments below

A better inter-departmental response, including embedding a health response to address the underlying causes of homeless, is crucial to the success of this strategy. It is also important that more is done than merely committing to better inter-agency work - routes and pathways for current providers with specialisms to feed into the process should be unambiguously established.

b) Do you agree with the actions outlined to oversee and deliver the Strategy?

Yes No

Please provide supporting comments below

More focus on the inclusion of specialist providers is needed here, including the practical details of how this collaboration can be done seamlessly and effectively.

c) In your view, what further actions could be taken to oversee and deliver this Strategy?

6. Objective Five: measuring and monitoring existing and emerging need

a) Do you agree that improved cooperation/data sharing between agencies and better quality data will improve service planning and provision?

Yes No

Please provide supporting comments below:

As we have already highlighted, it is vital that data and outcomes based accountability direction of travel are not generic. If so, specialisms will be lost and outcomes will be unachievable. This would ultimately lead to the complex, nuanced needs of clients not being properly met, which would result in an increased revolving door syndrome.

b) Do you agree with the actions outlined in the Strategy aimed at ensuring adequate analysis of existing and emerging need?

Yes No

Please provide supporting comments below:

Detailed, disaggregated data is a must. While there may be challenges with collecting data that reflects the complexity of current and emerging need, there is a danger that generic or over-simplified data will be counter-productive. For example, Causeway Women's Aid are currently part of an outcomes pilot with Supporting People which involves very generic data collection for ease of collation, and crucially does not address risk. This may potentially undermine the preventative thrust of the overall strategy.

c) In your view, what further actions could be taken to ensure adequate analysis of existing and emerging need?

7. Below, please provide any further comments you may have on the Strategy

Domestic violence is a unique situation where homelessness is concerned. While the ideal situation is for victim and their children to not become homeless, and instead get support while staying in the home, this is only possible if it is safe to do so. Hence, there are some situations in which it is preferable for a person to leave their home and get the right support to keep safe. Both refuge and floating support services are a vital part of homelessness support for victims of domestic violence. Refuges provide a safe space for women to live if home is no longer safe, and Floating Support services allow women to stay in the home. It is also important to note that our refuges are much more than a roof over a woman's head - we provide vital specialist emotional and practical support that are instrumental in helping victims to recover from abuse and build resilience to move forward with their lives. In this sense, our refuge services inhabit a dual role of crisis support and prevention or intervention service. By providing the right support during this time of need, we can help disrupt the cycle of violence, and potentially prevent further abuse or further situations that may lead to future or even chronic homelessness. Our Floating Support services, as well as the 24 hour support of the 24 Hour Domestic & Sexual Violence Helpline which is managed by Women's Aid, are also instrumental in helping victims maintain their tenancies

We welcome the recognition of increasing complex need in the strategy, and the requirement to address this to effectively tackle homelessness. This is vital for supporting domestic violence victims, who themselves may have a range of complex needs in addition to the abuse they are facing, including mental health concerns, disability, addiction, employment issues, and indeed homelessness.