

QUALITATIVE CONSULTATION RESPONSE

JANUARY 2020

*ending homelessness **TOGETHER***

Written Consultation Responses

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to the draft Chronic Homelessness Action Plan

The draft Chronic Homelessness Action Plan received 28 written responses during the formal 13 week consultation period.



Also, as part of the consultation process three consultation events were held in venues across Northern Ireland as detailed below:

Wednesday 19th June – WHITE HORSE HOTEL, DERRY/LONDONDERRY,

Thursday 20th June – THE JUNCTION, DUNGANNON

Friday 21st June – CRUMLIN ROAD GAOL CONFERENCE CENTRE, BELFAST



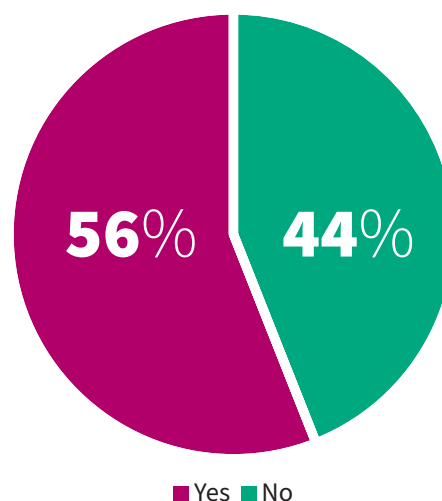
These events were well attended by a wide range of internal and external stakeholders, with representation from the statutory, voluntary and community sectors.

In addition to the consultation events presentations were delivered to a range of organisations across the statutory and voluntary sectors including the Housing Advice Practitioners' Forum, Area HCN and the Disability Forum.

In seeking consultation responses, the Housing Executive provided a series of questions on key issues throughout the document as part of a consultation response template. Within the 28 responses there was a number of consultees who chose to either use their own consultation response form or did not answer all of the yes/no questions within the Housing Executive's consultation response template.

(Please note the quantitative information is provided from the responses which provided direct answers to the yes/no questions in the consultation template. A qualitative overview of the 28 responses which provided a written response is included in the table which follows the quantitative overview)

Chronic Homelessness Indicators % Agreement



The low level of acceptances of the Indicators for Chronic Homelessness prompted further review and discussion. Revised criteria were drafted and ratified by the Central Homelessness Forum. The full criteria can be found in the published Chronic Homelessness Action Plan.

While there were high levels of agreement with the objectives of the Plan, it was noted that there was repetition within some of the objectives and actions. This was accepted and the Plan has been streamlined accordingly. There are now 7 Objectives instead of 10, however, the scope and range of actions remains broad.

The plan could be more concise, less repetitive and more definitive in terms of timescales instead of ‘as quickly as possible.’



Percentage Acceptance Rates for Objectives



Percentage Acceptance Rate for Actions



Acceptance rates for the actions were also high and generally positive. Some actions were merged or reworded to better reflect need. The full Action Plan can be found in the published document.

This document provides a direct response to issues raised in the 28 written responses NIHE received during the consultation period on the draft Chronic Homelessness Action Plan.

It is necessary to note that a large number of responses provide comments on issues that are beyond the remit of this Action Plan or the Northern Ireland Housing Executive. It has been agreed with the Department for Communities that comments on such issues will be forwarded to the Department who will deal with the relevant issue or raise with other departments as appropriate. A general overview of these issues is listed below:

- References to the Private Rented Sector and/or housing supply including:
 - The cost of the Private Rented Sector in relation to Local Housing Allowance Rates and the difficulty this causes in promoting the private rented properties as an alternative to social housing;
 - The ability to provide Housing First;
 - There are a range of issues associated with the Private Rented Sector (i.e. supply, standards, security of tenure and affordability) and there are also a number of challenges faced by chronically homeless with regards to sustaining accommodation in the PRS which go beyond these issues;
 - Difficulty in accessing private rental property for young people due to their age and financial capability;
 - There is reference to the 'accessibility, affordability, quality, security of tenure and sustainability problems experienced by many PRS tenants, especially those experiencing chronic homelessness';
- The need for a Housing Strategy that includes:
 - Identification and availability of suitable housing
 - Pace of delivery
 - Scattered – site approach
 - Financial modelling to ensure longer term affordability'
- Inter-agency working including the development of an 'inter-agency management and assurance framework which ensures all partners are accountable for the services they deliver.' Where possible, the consultation response has referred to the Inter-departmental Homelessness Action Plan (IDHAP) but in some cases the comments have went beyond the scope of the IDHAP.
- A strategic and financial commitment towards Housing First Services by health and social services.
- Development of formal protocols for local health and community services in providing support to Housing First service users in the community, moving away from the successful but informal working arrangements that are in place at present.
- Legislative change including:
 - Legislative reform should place a statutory duty to co-operate on each of the statutory bodies named in s6A (5) of the Housing (Northern Ireland) Order 1988.
 - A statutory duty on relevant agencies, so they have a legal duty to collaborate with the NIHE to address homelessness and to prevent and relieve homelessness
- Issues around development of housing including:
 - purchase of land and development of mixed housing types by the Housing Executive;
 - widening the offering of 'Affordable Housing' by Housing Associations, enabling citizens the opportunity to avoid rental market pressures and accessing low cost home ownership;
 - upscaling purchases of new and existing housing from the open market by social housing providers.
 - enforcement of policy on new build private developments to ensure delivery of social and affordable housing at appropriate rate based on housing need;
 - clearance schemes to see demolition and rebuild of older social housing schemes to prevent high levels of housing unfit.
- Funding challenges in both the delivery of the Chronic Homelessness Action Plan and the wider Supporting People programme.

The table which follows provides an overview of the written responses received by NIHE and a response in the context of the Chronic Homelessness Action Plan. In some cases where a point may not be directly referenced in the final version of the Chronic Homelessness Action Plan, it may be considered in the implementation of the Strategy. The Strategy contains high level objectives and actions that will be supported by implementation plans that will be produced annual over the life of the Strategy.

Consultee	Consultee Response	NIHE Response
<p>Apex Housing Association Ltd</p>	<p>‘Apex would suggest that the criteria listed are more the causes / factors / vulnerabilities leading to Chronic Homelessness. It may be more useful to identify the triggers of homelessness in order to assist in the prevention of Chronic Homelessness. The range of criteria is also very narrow as other factors such as relationship breakdown, domestic abuse, debt issues, history of rent arrears / ASB etc can also lead to Chronic Homelessness.’</p> <p>‘Apex would also question the definition of Chronic Homelessness to meeting three or more of the criteria. Many homeless people may only experience two criteria, e.g. an individual who experiences more than one episode of homelessness, has mental health issues and still experience Chronic Homelessness.’</p> <p>‘It may be more effective to simply record incidences of Repeat Homelessness in terms of length of time, number of repeat presentations and reason(s) for Repeat Homelessness. This would provide a useful insight into why the prevention activity failed in the latest case.’</p> <p>‘Due to many homeless schemes / hostels being self-referral with no NIHE application required or NIHE involvement, capturing these numbers would be critical in giving a more comprehensive and realistic picture of just how many Chronic Homeless cases we are dealing with.’</p> <p>In terms of the above comment this response also noted ‘This has been recognised as a problem and one which could be resolved should additional resources be available, possibly using a unique identifier that can both track and collate these potentially missed numbers through a shared information capture arrangement.’</p> <p>‘Review good practice including the recent Scottish Government “Ending Homelessness Together: High Level Action Plan” and Legislation in other parts of the UK. Also consider developing a Prevention of Homelessness Guide / introducing a prevention duty (as per the Scottish Government as set out in their Ending Homelessness Together Action Plan).’</p>	<p>Not Accepted – The factors cited e.g. relationship breakdown, history of rent arrears are relevant to the wider issue of homelessness and while the Housing Executive accepts these are also relevant to chronic homelessness the criteria is a response to specific factors relevant to chronic homelessness. As a result this has not been included in the revised criteria.</p> <p>Noted – This comment has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation. Collection of data and analysis will also apply to those who do not meet the criteria which will fully reflect the homelessness population. This will help us understand the scale of the problem of chronic homelessness and our understanding of the support services referrals</p> <p>Noted – Review of the causes of repeat homelessness is a key activity contained in the Chronic Homelessness Action Plan. Revised Objective 1 sets out how we will ‘Review causes and trends in terms of repeat homelessness and develop actions to address underlying issues’. The Housing Executive has commenced an internal research project on repeat homelessness and will continue to monitor such cases in future years. The Housing Executive will also seek to ensure key stakeholders are updated on the outcomes of this research.</p> <p>Accepted – This is an issue which has been raised as part of the Strategic Review of Temporary Accommodation and this comment will be brought forward in the context of work on this project. The Housing Executive will also seek to bring this forward as part of the Chronic Homelessness Action Plan. One of the key actions set out in Objective One of the Action Plan is the collection of chronic homelessness numbers and data through a cross agency approach.</p> <p>Accepted – This will be brought forward as part of the Action Plan and the concept of a unique identifier is something that will be considered.</p> <p>Noted – This will be considered in the final version of the document. The exploration of a prevention duty is reflected throughout in the Action Plan. In particular revised Objective 2 contains a wide number of preventative actions including Homelessness Prevention Funding.</p>

Table continues

Consultee	Consultee Response	NIHE Response
Barnardo's NI	<p>'Barnardo's NI welcomes the aims and objectives set out in the Action Plan, particularly the commitment to early intervention, prevention and identification of risk indicated across Aims 1 and 2. In addition, we welcome the recognition of the lasting impact of childhood trauma and adversity: further to this, we recommend that a trauma-informed approach is adopted throughout this Action Plan.'</p> <p>'We recommend that data collection includes information about whether the individual was previously in care ("Looked After"), and whether they were identified as an unaccompanied child.'</p> <p>'It is crucial to adopt a multi-agency approach to understand and address the causes of chronic homelessness by working with the community and voluntary sector and other government agencies.'</p> <p>'How will Adverse Childhood Experiences be assessed and how will this be measured in those identified as Chronic Homelessness if it is not contained in the criteria listed?'</p>	<p>Noted and accepted – The Housing Executive is keen to work with all relevant agencies to ensure a trauma-informed approach guides the development of this Action Plan. The Housing Executive is currently working with the Trauma Informed Practice Project, delivered by Safeguarding Board for Northern Ireland to support the implementation of trauma informed practice guidance across NIHE offices.</p> <p>Accepted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation. The criteria has been amended to reflect the consensus of consultation responses</p> <p>Accepted – The implementation of this Action Plan will be guided by inter-agency working that is outlined in both the Chronic Homelessness Action Plan and the Homelessness Strategy.</p> <p>Noted - The Housing Executive is currently working with the Trauma Informed Practice Project, Safeguarding Board for Northern Ireland to support the implementation of trauma informed practice guidance across NIHE offices. Going forward the Housing Executive is committed to reviewing the criteria and the inclusion of how Adverse Childhood Experiences can be used as an indicator for chronic homelessness may form part of this review.</p>
Belfast Central Mission	<p>'We would like consideration to be given to domestic abuse and the impact of non violent forms of abuse.'</p> <p>'It is very important to find an appropriate method of including the views of service users past and present. Tracking service users who are most at risk of repeat homelessness will need effective interagency co-operation.'</p> <p>'There is a need for better links with existing provider forum, such as local area homeless action groups, CYPSP locality groups, family support Hubs etc. While NIHE has appointed representatives at many local groups attendance is often inconsistent.'</p> <p>'The cost of PRS is extortionate and not met by current LHA rates. There needs to be other options.'</p>	<p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation. The criteria has been amended to reflect the consensus of consultation responses.</p> <p>Accepted – The Housing Executive will seek additional opportunities on an ongoing basis to engage with service users beyond the Service Users Forum. This is reflected in the action 'Explore other mechanisms for capturing service user experiences of chronic homelessness' contained in revised Objective 1.</p> <p>Noted – The Homelessness Local Area Groups are coordinated by the Homelessness Strategy Unit which provides consistent attendance. The Housing Executive will consider the comments in relation to other points to address any issues with regards to inconsistent attendance. We see interagency working as a fundamental part of the delivery of Chronic Homelessness Action Plan and are fully engaged and committed to attendance at the appropriate Fora as seen by our structures in terms of Local Area Groups and Central Homelessness Forum.</p> <p>Noted – As noted earlier in this document this comment will be brought to the Department for Communities for consideration.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>‘Allow patch managers opportunities to engage with their local communities and therefore have a sound knowledge of the services available and signpost said tenants to floating support services, statutory services and community organisations who can do this more intensively thus reducing repeat homelessness.’</p> <p>‘There is a need to explore a variety of housing options to suit the needs of those vulnerable to chronic homelessness. Different supports work for different people.’</p> <p>‘A longer term or indefinite service may be needed for vulnerable people with complex needs as two years of support in the community may not be enough.’</p> <p>‘The plan could be more concise, less repetitive and more definitive in terms of timescales instead of ‘as quickly as possible.’</p> <p>‘How do they plan on relieving difficulties with registering with GP etc, opening bank accounts, applying for benefits due to no fixed abode (job centre can be used but this isn’t widely publicised).’</p>	<p>Noted – These duties are a key part of the role of a Patch Manager and the Housing Executive will continue to promote referral/signposting to appropriate services to reduce repeat homelessness.</p> <p>Noted – This is acknowledged throughout the Action Plan and relevant actions have been included under revised Objectives 3, 4, 5 and 6. This comment will be considered as part of revised Objective 6 which is to ‘Consider a range of housing options for the chronic homeless including Housing First models and ensure they are supported into permanent accommodation as quickly as possible’</p> <p>Noted – This comment has been reflected throughout the Action Plan. It has been considered as part of revised Objective 1 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’. This will also be included in revised Objective 6 where we will ‘Ensure provision of support is flexible and interchangeable as time bound models of service delivery are not always best for this client group’.</p> <p>Accepted – Objectives and actions have been reviewed to ensure less repetition. ‘As quickly as possible’ has been partially accepted to reflect that it is not possible to use definitive timescales as the needs of households will vary depending on their vulnerability which, in turn, impacts on how long they will require assistance for. ‘As quickly as possible’ has now been amended to ‘as quickly as possible subject to the needs of the client’.</p> <p>Accepted - Non-accommodation based issues will be brought forward as part of the Inter-departmental Homelessness Action Plan which is referred to in revised Objective 7.</p>
Belfast City Council	<p>The development of specific criteria to determine whether an individual is ‘chronic homeless’ is welcomed, however a matrix approach may be useful to understand how the different elements interact to determine the persistence/severity and associated level of support required.</p> <p>As well as alignment to the Programme for Government, NIHE should ensure alignment to the Community Plan for each local government district.</p>	<p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation. This analysis of the criteria goes beyond those classified as experiencing chronic homelessness. The Action does contain objectives that will measure chronic homelessness but will use that data to identify existing and emerging needs which will be to inform service provision.</p> <p>Accepted – The Homelessness Local Area Groups are coordinated by the Homelessness Strategy Unit and provide an opportunity for council representation and linkage with local community plans which would improve inter-agency working in the Area.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>Specific mechanisms to monitor and report on performance and trends is welcomed as an evidence based approach to joint resourcing & monitoring & evaluation of services is much needed. However, it is recommended this needs to align with the monitoring and reporting mechanisms of other agencies given the cross cutting nature of this issue.</p> <p>Consideration should be given to working with existing chronic homeless clients to map out their end to end journey across support agencies, with a specific focus on identifying common opportunities that may have been missed to prevent the homelessness escalating.</p> <p>Council is supportive of this objective, however believes it should extend beyond the ‘promotion’ of inter-agency issues given the high levels of vulnerability with this client group. Council believes NIHE should implement an inter-agency management and assurance framework which ensures all partners are accountable for the services they deliver.</p>	<p>Noted– The monitoring and evaluation of data collection and trends will be guided by inter-agency working that is outlined in both the Chronic Homelessness Action Plan and the Homelessness Strategy with the support of the Department of Communities. Non-accommodation based issues will be brought forward as part of the Inter-departmental Homelessness Action Plan which is referred to in revised Objective 7. Revised Objective 1 of the Action Plan also sets how we are committed to introducing mechanisms to monitor and report on chronic homelessness trends and we want to ‘Develop reports to identify trends in relation to chronic homelessness from data collected by all agencies’.</p> <p>Noted – As part of the Homelessness Strategy Year 3 Implementation Plan a research specification for the Customer User Journey has been completed, which will address the end-to-end journey for those individuals experiencing chronic homelessness. The action Plan in revised Objective 1 also includes reference to inter-agency data collection which can be used to trace the customers journey across agencies</p> <p>Noted – As noted earlier in this document this comment will be brought to the Department for Communities for consideration. This comment will be brought forward for discussion as part of the Inter-departmental Homelessness Action Plan which will address any inter-departmental agreements.</p>
<p>Belfast Health Cities and Developing Healthy Communities</p>	<p>‘Firstly, the Northern Ireland Housing Executive (NIHE) should be commended for taking the initiative to develop a specific action plan to address the issue of chronic homelessness, thereby recognising and placing emphasis (in policy and practice) on the complexity of homeless and the reality that different groups of homeless exist and require specific and targeted attention.’</p> <p>The consultation response notes comments with regards to the suitability of the criteria.</p> <p>The consultation response notes comments with regards to the current tests for homelessness, particularly with regards to eligibility and intentionality.</p> <p>‘More broadly, in order to measure change/improvement effectively, the outcome indicators included on the action plan require greater specificity. The indicators currently included tend to be prefixed with ‘Improvement’. It may be useful to quantify the threshold for improvement.’</p>	<p>Noted – recognition of the context of this comment has been a key driver in the development of the Chronic Homelessness Action Plan.</p> <p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation.</p> <p>Not accepted - The tests within the current homelessness legislation are beyond the remit of both the Housing Executive and the Chronic Homelessness Action Plan. The Action Plan does commit through revised Objective 1 to use analysis of data collected to inform legislative review where gaps in the legislative framework are identified and through revised Objective 7 to seek review to the homelessness legislation.</p> <p>Accepted – Where possible this has been addressed. The action plan will be reviewed and refreshed each year and we will make it more specific when our ability to quantify any improvements increases with the development of additional data capture.</p>

Table continues

Consultee	Consultee Response	NIHE Response
<p>Children’s Law Centre</p>	<p>‘CLC would therefore welcome details of any direct consultation with children and young people that the NIHE has carried out, or intends to carry out on the Chronic Homelessness Action Plan, including details and copies of any child accessible versions of the Action Plan which have or will be made available. These proposals directly affect children and young people and so children and young people must be consulted in relation to them. Failure to consult with children and young people is a breach of section 75 of the Northern Ireland Act 1998, Article 12 of the UNCRC and the NIHE’s Equality Scheme.’</p> <p>‘The Equality Commission’s Guidance for Public Authorities on implementing Section 75 of the Northern Ireland Act 1998 states that in conducting consultations, the accessibility of language and the format of information should be considered to ensure that there are no barriers to the consultation process, with information being made available on request in accessible formats.’</p> <p>‘CLC believes that in respect of this policy there is potential for adverse impact on children and young people and therefore this policy should be screened in and a full EQIA carried out in respect of this policy. CLC would therefore respectfully request that the NIHE undertakes a full assessment of the equality implications and direct consultation with children and young people as a matter of priority.’</p>	<p>Noted - We welcome and agree in principle with the points made. When we plan consultation we look carefully at the need to target particular groups including children. Consultation toolkits provide guidance on how to consult children. The Housing Executive also takes advice from groups such as the National Children’s Bureau. However whilst we recognise that homelessness generally can and does impact on children’s lives the scope of the Chronic Homelessness Action Plan is limited primarily to groups which do not include children but mostly to single adult males or females who have complex needs such as addictions or mental health problems. In summary the Housing Executive does not see any benefit in consulting children however; the next consultation on the Homelessness Strategy will consider children.</p> <p>Children and young people are reflected in the consultation. We address the impact of chronic homelessness on young people, for example, the criteria for chronic homelessness has been amended to reflect ‘looked after’ young people and revised Objective 2 sets out our commitment to look at Adverse Childhood Experiences and how these can be used as a chronic homelessness indicator.</p> <p>Additionally the Homelessness Strategy implementation plan has a number of key milestones in relation to young people including linking in with Relentless Change Project, NI Youth Forum to promote an alternative version of their homelessness awareness video to target different demographics. Another milestone is to develop services and support the development of services by partners, to meet the needs of young people who are most at risk of homelessness. Change funding has been secured to develop a young person’s peer mentoring scheme to reduce repeat homelessness among care leavers and prevent homelessness where possible.</p> <p>Noted-There is a wide range of communication support available including translation services in over thirty languages and immediate telephone based interpretation services. Arrangements can be put in place to hold meetings when interpreters are present.</p> <p>Not accepted- We have considered this point carefully and would not accept it as our records and understanding of chronic homelessness point to the fact that children are not directly included within the scope of this policy.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>‘Any Action Plan must fully reflect the needs and rights of homeless 16 and 17 year olds and recognise the legal duties owed to them by the Northern Ireland Housing Executive and the Health and Social Care Trusts. Unfortunately this action plan is designed to tackle homelessness in the adult world only and does not provide for the needs of young people experiencing homelessness. This issue was raised by CLC in our response to the NIHE Homeless Strategy 2017-22 and has not been taken into account in the development of this action plan which is designed to implement the 2017-22 strategy.’</p> <p>‘The United Nations Committee on the Rights of the Child at their last examination of the UK government’s implementation of the UNCRC expressed serious concern.....therefore recommended that the UK government (including devolved administrations): “Take necessary measures to reduce homelessness and to progressively guarantee all children stable access to adequate housing that provides physical safety, adequate space, protection against the threats to health and structural hazards, including cold, damp, heat and pollution, and accessibility for children with disabilities.” CLC would therefore recommend embedding Article 27 of the UNCRC into the Chronic Homelessness Action Plan as a fundamental principle of the Plan and to specifically address the Committee’s recommendation above within 3 Year Plan 2019 – 2022 outlined in Chapter 11 of the consultation document.’</p>	<p>Noted- The needs and duty of care owed to 16 and 17 year olds is addressed through the joint protocol ‘Meeting the accommodation and support needs of 16-25 year olds’ a regional good practice guidance agreed by the Northern Ireland Housing Executive and the Health and Social Care Trusts. As already mentioned the Action Plan does reference the impact of chronic homelessness on young people and a number of actions have been identified to address this problem. As mentioned above the scope of the Chronic Homelessness Action Plan is limited primarily to groups which do not include children but mostly to single adult males or females who have complex needs such as addictions or mental health problems. In summary the Housing Executive does not see any benefit in consulting children however, the next consultation on the homelessness strategy will consider children.</p> <p>Not accepted - Homelessness can and does impact on children’s lives but the scope of the Chronic Homelessness Action Plan is limited primarily to groups which do not include children but mostly to single adult males or females who have complex needs such as addictions or mental health problems. The Housing Executive will continue to address homelessness which affects children as they may form part of the homelessness household. Continued work on prevention as part of the Homelessness Strategy will also help to address the needs of children.</p>
<p>Depaul</p>	<p>‘There criteria needs to ensure that it is not so rigid that it risks excluding vulnerable individuals. Some of the criteria could be merged with broader definitions. (as discussed at the consultation event in Dungannon).’</p> <p>‘Reliable stream lined data collection systems will be really beneficial, It is essential that clear guidelines are outlined on the interpretation of data both at the point of entry and extraction in order to ensure reliability of information and trend analyses.’</p> <p>‘As early identification is crucial to implementing prevention strategies there is need for formalised inter departmental agreements.’</p> <p>‘Education and training plan for groups who are in positions that allow early detection of issues.’</p>	<p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation.</p> <p>Accepted – the development of data collection systems will be accompanied by clear guidelines.</p> <p>Noted – This Action Plan will be developed in the context of the Inter-departmental Homelessness Action which will address any inter-departmental agreements. It is envisaged that the criteria will be shared across agencies and data sharing arrangements introduced as a result.</p> <p>Noted – This comment will be addressed in the context of Objective One of the Homelessness Strategy 2017-22 and specifically, the action to provide training on the early identification of homelessness.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>‘Health Support needs – A Housing First approach supports access to treatment, harm reduction and ultimately behavioural changes. There is a need for a Housing Strategy that includes:</p> <ul style="list-style-type: none"> • Identification and availability of suitable housing • Pace of delivery • Scattered – site approach • Financial modelling to ensure longer term affordability’ <p>‘The lack of housing supply has a considerable impact on the capacity of each of the Housing First services. We strongly recommend there be investment into the employment of a NI regional Housing First Director/ Coordinator to deliver an implementation plan for the up-scaling and roll out Housing First across NI. We would see this individual based within the voluntary sector. A useful source of reference: The National Director of Housing First in ROI Bob Jordan)’</p> <p>‘A strategic and financial commitment towards Housing First Services by health and social services. This should be integrated with the NIHE homelessness strategy and action plan.</p> <p>‘Development of formal protocols for local health and community services in providing support to Housing First service users in the community, moving away from the successful but informal working arrangements that are in place at present.’</p>	<p>Noted - As noted earlier in this document this comment will be brought to the Department for Communities for consideration.</p> <p>This comment will be a key part in the planning for the extension of Housing First which is included in the Action Plan. We will need to work on an inter-departmental basis in order to achieve the action contained in revised Objective 6.</p> <p>Noted – As noted earlier in this document this comment will be brought to the Department for Communities for consideration.</p> <p>A key consideration to implementing the Housing First action contained within revised Objective 6 is how to co-ordinate and deliver it.</p> <p>Noted – This comment will be brought to the Department for Communities for consideration. While the Housing Executive has provided a strategic commitment in the Chronic Homelessness Action Plan any further commitment on behalf of other agencies or departments will be raised in response to this consultation.</p> <p>Noted – As noted earlier in this document this comment will be brought to the Department for Communities for consideration.</p> <p>As part of the implementation of the objective regarding Housing First we need to consider formal working relationships and the role the Housing Executive will play in the management of its delivery.</p>
<p>East Belfast Mission</p>	<p>‘Concerned that you need to meet three of the criteria to be classed as chronic. Also an individual with more than one episode of homeless in 12mths seems too short. By using this criteria I’m concerned you missing out a large group of people who are only able to have a tenancy for short periods of time.’</p> <p>‘Concerned that annual street counts isn’t frequent enough to collect accurate data. They should also consider if other trends impact the figures, i.e. seasonal Christmas, holiday periods, periods of good weather summer/winter. Do figures match other figures related to homelessness such as job losses in the area?’</p> <p>‘It will be very difficult to learn anything from a service users forum, if only meeting once a year especially due to the chaotic nature of the people involved. Could this information be collected differently? Speaking to service users while in engaged in a current homeless services on a one to one basis may be more useful i.e. meeting clients engaged with street soccer, floating support services and hostels.’</p>	<p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation.</p> <p>Noted – The annual street counts which are referred to in the Action Plan are consistent with methodology used in neighbouring jurisdictions and consideration will be given to increasing the frequency of these. Furthermore, the Housing Executive has committed to street audits as part of the Action Plan, carried out over a number of weeks, to improve the collection of data and our understanding of the issues which lead to street activity/ rough sleeping.</p> <p>Accepted – The Housing Executive will seek additional opportunities on an ongoing basis to engage with service users beyond the Service Users Forum. This is reflected in the action ‘Explore other mechanisms for capturing service user experiences of chronic homelessness’ contained in revised Objective 1.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>‘Concerned about the mention of using shared accommodation. For most Chronic homeless, not having the skills and having too high a needs for shared living has lead to them being homeless and sleeping rough.’</p> <p>The response notes the need for an additional action ‘For support for people living with complex mental health issues and those with complex needs. A level of supportive living that isn’t a hostel but more than floating support.’</p> <p>The response notes the need for an additional action ‘Cross funding to allow a range of services to engage with a client as needed and for longer periods than 2 years.’</p> <p>‘Temporary accommodation can only be as short as possible if there is somewhere suitable for the person to move to.’</p> <p>‘Would be good to go into more detail about what data would be captured and what it will really mean for Chronic homelessness. Will it allow someone’s case to be tracked over a long period of time? Will it consider how people change needs over time? How those who are chronic homeless, have chaotic lifestyles and can make big progress in their lives but also after a settled period go back to old lifestyles. With this pattern continuing over their life.’</p>	<p>Noted – The Action Plan notes the intention to ‘explore new options for affordable housing’ and this comment will be considered in the context of any discussions or work on new options. The Action Plan accepts the need for a range of accommodation and support services for those experiencing chronic homeless.</p> <p>Noted – This point is addressed in Action Eight and the reference to the development of Housing First.</p> <p>Noted – This comment will be considered as part of revised Objective 1 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’. This comment has been reflected in Objective 6 where we will ‘Ensure provision of support is flexible and interchangeable as time bound models of service delivery are not always best for this client group’</p> <p>Accepted – This comment is already included in the aims of the action plan and is reflected in the actions included in revised Objective 5.</p> <p>Accepted – This will be considered as part of the review of the criteria and the recording mechanisms on the Housing Management System (HMS) This comment will be considered in the development of actions under revised Objective1.</p> <p>We will also consider this comment when reviewing how Housing Advisors and Patch Managers will case management those experiencing chronic homelessness. Revised Objective 3 has been amended accordingly to reflect how we use this as a tool to inform case management.</p>
Extern	<p>The consultation response notes comments with regards to the suitability of the criteria e.g. ‘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.’</p> <p>Comment regarding Objective One ‘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.’</p>	<p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation.</p> <p>Not accepted – While the Housing Executive appreciates and agrees with the need for urgency the Action Plan has been developed in recognition of the challenges associated with delivering various actions and the timescales reflect these challenges. With regards to the comment on providing accommodation it should be noted that to address chronic homelessness requires more than accommodation and therefore requires the cooperation of a wide range of agencies. Objective 1 refers to the development of the criteria and data collection arrangements and reflects the changes that will take place during the three-year period including the broadening out of data collection to other agencies.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>‘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.’</p>	<p>Accepted – This will be amended in the final version. Objectives 1-3 have been amalgamated in the redrafted Chronic Homelessness Action Plan to become Objective 1. ‘Prevent’ has been included in this new objective.</p>
	<p>‘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.’</p>	<p>Accepted – This will be included in the final document. Mechanisms have been included in a number of objectives in the action plan which will identify those who are at risk of chronic homelessness including young people. Revised Objective 2 specifically sets out to ‘Develop mechanism across agencies for the early identification of those at risk of homelessness or chronic homelessness’ which includes an action to review protocols which address the needs of young people.</p>
	<p>‘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.’</p>	<p>Noted – The Homeless Local Area Groups and the Homelessness Strategy’s communication strategy will be used to address this comment. This will be considered in the context of the implementation of revised Objective 2 where there is a commitment to ‘provide a positive image on how they can assist those that are experiencing chronic homelessness.’</p>
	<p>‘Remove reference to promoting the giving of money to charity rather than a person begging, this is a moral judgement.’</p>	<p>Accepted – This will be amended in the final version of the Chronic Homelessness Action Plan to providing an awareness campaign regarding services available for those experiencing chronic homelessness rather than becoming involved in street begging. The Action Plan sets out our desire to address street activity.</p>
	<p>When referring to Objective Five this response notes that ‘A comprehensive set of actions to address poverty, social exclusion, loneliness, and isolation needs to be urgently developed and included under this objective.’</p>	<p>Noted – This comment has been added to one of the actions in revised Objective 3 ‘Ensure Patch Managers work with the most vulnerable tenants promoting health, wellbeing and resettlement skills’. We will also bring this comment to the Central Homelessness Forum and HSSG in Year 1 to consider how this can be achieved.</p>
	<p>Extern have suggested a number of alternative solutions to challenges to housing solutions across different tenures.</p>	<p>Noted – These suggestions are relevant to ongoing work on the Strategic Review of Temporary Accommodation and will be considered as part of this piece of work.</p>
	<p>‘As quickly as possible’ is not a strong enough commitment, maximum time frames need to be committed to and included here.’</p>	<p>Noted - ‘As quickly as possible’ has been partially accepted to reflect that it is not possible to use definitive timescales as the needs of households will vary depending on their vulnerability which, in turn, impacts on how long they will require assistance for. ‘As quickly as possible’ has now been amended to ‘as quickly as possible subject to the needs of the client’</p>
	<p>With regards to Objective Six the consultation response notes ‘This objective should also include ‘engage with people who are chronically homeless.’</p>	<p>Accepted – This will be amended as part of the revised Chronic Homelessness Action Plan.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>'A maximum time that someone will spend in temporary accommodation needs to be set.'</p> <p>Objective Eight '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).'</p> <p>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.</p>	<p>Noted – The Action plan includes actions to assess the needs and capabilities of the individual and address move on arrangements.</p> <p>A time limit on the amount of time that an individual resides in temporary accommodation is something that the Housing Executive is unable to commit due to a number of internal and external factors including availability of suitable permanent accommodation which would require commitment from providers which is outside the control of the Housing Executive. This comment will be brought to the Department of Communities for consideration.</p> <p>Partially accepted– changes to objective will be reflected in the final document but we are unable to commit to a time limit as such a commitment would not be cognisant of external factors such as the supply of permanent accommodation.</p> <p>Noted-This comment is already reflected throughout the Action Plan particularly through revised Objective 6, which reflects the need to consider a range of housing options.</p>
<p>First Housing Aid & Support Services</p>	<p>'We believe that criteria for measurement are essential so that there is clarity and greater understanding of the scale of chronic homelessness. Proper Descriptors and identifiers of the problem will enhance accurate measurement. However, we are of the opinion that the definition is very wide. Our thinking is that it could be condensed under Vulnerability as defined within the Homeless Persons (NI) Order 1988 amended 2003 and 2010.' This response included a substantial narrative on the criteria which has been considered in the final draft of the Chronic Homelessness Action Plan.</p> <p>'First Housing agrees the necessity to identify groups of people suffering chronic homelessness, the gaps in the service and indeed how services could be better aligned to fit with the needs identified.'</p> <p>'The development of resources within schools is a good first start for early intervention. The Education Authority could also make it part of the National Curriculum whereby every child in that position knows where they can access help and support and the barriers that they could face in that situation.'</p>	<p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation.</p> <p>Accepted – This has been a key consideration in the development of revised Objective 1.</p> <p>Accepted – Non-accommodation based issues will be brought forward as part of the Inter-departmental Homelessness Action Plan which is referred to in revised Objective 7.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>‘With regard to early intervention by looking at adverse childhood experiences being used as a chronic homeless indicator the current indicators neglect to show ACE as one of the indicators.’</p> <p>‘Recently we have been to meetings whereby it was discussed that the Private Rented Sector could be used in bulk through landlords getting involved in buy to let models with increased rents and longer leases. Indeed some of the models used are located in Scotland where there are some of the most chronically homeless people in Western Europe in terms of drug use and poor access to services so,; We believe that if case studies are to be used that they should focus on those initiatives that have produced appropriate outcomes.’</p> <p>‘We are encouraged that the NIHE are exploring options to support the PRS and security of tenure... There needs to be more security of tenure, longer leases, Deposits and rent bond guarantee schemes.’</p> <p>‘We would like to see the expansion of a Hub that creates pathways to housing and health.’</p> <p>‘We believe that Housing First although good in vision will not be the answer for the most entrenched chronic homeless individuals without proper resources and services being wrapped around them at the point of need.’</p> <p>‘Traditionally Housing First has been delivered in Northern Ireland on a small scale we would like to see a proper analysis of the outcomes for this tenure and the sustainability.’</p>	<p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation. An individual can be said to be experiencing chronic homelessness if they meet the circumstances and behaviours set out in the criteria. This differs from Adverse Childhood experiences which can be used as an indicator for those who may become chronically homeless in the future. Revised Objective 2 sets out our commitment to look at Adverse Childhood Experiences and how these can be used as a chronic homelessness indicator</p> <p>Noted and accepted – This will be considered as part of revised Objective 3 where a number of actions have been identified to promote access to the private rented sector and security of tenure. Non-accommodation based issues will be brought forward as part of the Inter-departmental Homelessness Action Plan which is referred to in revised Objective 7.</p> <p>Accepted – This will be considered as part of revised Objective 3 where a number of actions have been identified to promote access to the private rented sector and security of tenure. Non-accommodation based issues will be brought forward as part of the Inter-departmental Homelessness Action Plan which is referred to in revised Objective 7.</p> <p>Noted – Non-accommodation based issues will be brought forward as part of the Inter-departmental Homelessness Action Plan which is referred to in revised Objective 7.</p> <p>Noted – This comment will be brought to the Department for Communities for consideration. While the Housing Executive has provided a strategic commitment in the Chronic Homelessness Action Plan any further commitment on behalf of other agencies or departments will be raised in response to this consultation. We are committed to exploring a range of housing led options including Housing First as set out in revised Objective 6 of the Action Plan.</p> <p>Noted -The Housing First model is currently provided in NI by Depaul in Belfast and Derry/Londonderry. The social return on investment (SROI) evaluation 2016 of Housing First found that from April 2013 to the end of 2015, 79% of successful referrals maintained their tenancy for a significant period of time and developed reasonable or good self-care skills. Depaul has recently published Housing First, Leading the Way Together on the fidelity of the projects, which shows they operate to a high level of fidelity with 74% staying in their accommodation for over 2 years. Appendix B Chronic Homelessness Action Plan contains a section on research on housing led pathways approach</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>'First Housing is in total agreement with the action to Support investment in a multi-disciplinary working system. For too long we have been envious of the multi-disciplinary approach operating in Belfast and we would like to see that being rolled out in Derry and other urban centres.'</p>	<p>Noted and agreed - This comment will be taken forward as part of revised Objective 7. Approval has been given for the extension of the Extern Multi-Disciplinary Homeless Support Team into South Eastern Health and Social Care Trust Area. Initially with a view of this being expanded as a Northern Ireland model.</p>
<p>Homecare Independent Living</p>	<p>We recognise the increased presentations to Homeless Sector Services from those with a Chronic Homeless background and therefore welcome the aims and objectives of the Chronic Homelessness Action Plan.</p> <p>We agree with objective re early intervention and believe that additional resources are key for services to respond in a timely and effective manner.</p>	<p>Noted – The context of this comment was a key driver in developing a Chronic Homelessness Action Plan.</p> <p>Noted - This will be taken forward as part of the action plan.</p>
<p>Housing Rights</p>	<p>The Housing Executive notes that Housing Rights provided a very detailed response covering all aspects of the Chronic Homelessness Action Plan. The consultation response document responds to the issues raised in the Executive Summary of Housing Rights response but all comments have been considered in the redraft of this document.</p> <p>Housing Rights strongly welcomes the development of a Chronic Homelessness Action Plan and believes it is crucial that this Plan focuses specifically on how best to address the issues faced by those who experience/are at risk of chronic homelessness.</p> <p>Housing Rights believes it is essential that the content of the Plan has been informed directly by the views of those who have lived experience of being chronically homeless. The NIHE may wish to consider commissioning an external facilitator to ensure effective input from/consultation with people who have experienced chronic homelessness, in order to inform the development of the final Action Plan.</p> <p>In order to define and identify chronic homelessness/ those at risk of chronic homelessness, it may be useful, in practice, for the NIHE to consider adopting a two-stage approach, involving an initial screening by frontline staff, followed by referral to a multidisciplinary team.</p> <p>The NIHE may wish to review the operationalisation of certain Housing Solutions and HOME Team processes to ensure that chronically homeless individuals do not face additional barriers in accessing services.</p>	<p>Noted - All comments from this response have been considered in the redraft of this document</p> <p>Noted - recognition of the context of this comment has been a key driver in the development of the Chronic Homelessness Action Plan.</p> <p>Accepted – The Housing Executive will seek additional opportunities beyond the Service User Forum to engage with service users. The Housing Executive currently use an external facilitator (Council for the Homeless Northern Ireland) to host the Service Users Forum. The Housing Executive will seek additional opportunities on an ongoing basis to engage with service users beyond the Service Users Forum. This is reflected in the action 'Explore other mechanisms for capturing service user experiences of chronic homelessness' contained in revised Objective 1.</p> <p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation. We are initially aiming to capture those individuals presenting at the Housing Executive who are experiencing chronic homelessness. The second phase will extend this data capture to other agencies. We want to ensure there is multi-disciplinary involvement in the delivery of support.</p> <p>Accepted - A proposal for the expansion of the SCNI HOME Team has been drafted. It is anticipated that the expansion of the scheme will be operational during September 2019. Ongoing contract managements will ensure that households experiencing chronic homelessness do not face additional barriers in accessing services.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>The NIHE should consider including not only the development of protocols within the Action Plan but also how to ensure Protocols, when developed, are adhered to in practice and monitored effectively.</p> <p>Housing Rights would support legislative change and would recommend that this legislative reform should place a statutory duty to co-operate on each of the statutory bodies named in s6A (5) of the Housing (Northern Ireland) Order 1988.</p> <p>There are a range of issues associated with the Private Rented Sector (i.e. supply, standards, security of tenure and affordability) and there are also a number of challenges faced by chronically homeless with regards to sustaining accommodation in the PRS which go beyond these issues. Collectively these make it unlikely this sector will make a substantive contribution to providing a suitable long term response for people who are chronically homeless.</p> <p>Housing Rights supports the adoption of a Housing First (as distinct from a Housing Led) approach and would suggest that the Action Plan clearly defines what is meant by 'Housing First' and how this would be implemented.</p> <p>Housing Rights believes it may be useful for the NIHE to carry out a review of Out of Hours provision and ensure that any partners providing this service are given comprehensive training.</p> <p>Housing Rights is concerned about the detrimental impact of exclusion and eviction from temporary accommodation on chronically homeless individuals and would suggest that these issues should be explicitly considered in the Strategy and addressed in the Action Plan.</p>	<p>Accepted - As part of the development of protocols the Housing Executive will ensure that reference is made to how protocols are adhered to in practice and monitored effectively. This will also be considered as part of the non-accommodation based issues that will be brought forward as part of the Inter-departmental Homelessness Action Plan which is referred to in revised Objective 7.</p> <p>Noted – As noted earlier in this document this comment will be brought to the Department for Communities for consideration.</p> <p>Noted – As noted earlier in this document this comment will be brought to the Department for Communities for consideration.</p> <p>Actions supporting access to the Private Rented Sector are included in the Action Plan. We are committed to exploring a range of actions included in revised Objective 3, to promote the PRS including the delivery of a successful Private Rented Sector Access Scheme and exploring new options and methods to incentive landlords to provide properties for individuals who are experiencing chronic homelessness.</p> <p>Accepted –An additional paragraph will be added outlining what is meant by Housing First and how this would be implemented.</p> <p>While Housing First Services are being delivered in terms of their benefits they are on a proportionately smaller scale than other regions of the UK and are geographically restricted to Belfast and Derry/Londonderry.</p> <p>Accepted –This comment will be considered as part of Objective 6. Provision of Out of Hours (Emergency Homelessness provision) is currently under review. This service will be provided in-house by the Housing Executive from January 2020. Appropriate training will be provided to staff.</p> <p>Accepted – This comment is reflected in a number of actions contained in revised Objective 5 of the Action Plan. These issues can be addressed through the review of single let provision and Strategic Review of Temporary Accommodation. As a result of this public consultation process the action plan has been amended to include a commitment to conduct research into exclusions and exclusion policies from temporary accommodation</p>

Table continues

Consultee	Consultee Response	NIHE Response
Individual Response 1	<p>‘Develop rural support services that acknowledged the dispersed nature of service delivery due to rural living/ very low population density in isolated communities outside towns & cities – some of the most vulnerable people will be found under these circumstances’</p> <p>‘To best meet the needs of chronic homeless clients existing temp accommodation services require greater resources/support from external sources to meet the health and addiction needs of chronic homeless clients.’</p> <p>When referring to objective 7 this response noted that ‘A drastic increase in housing stock is required to make this possible...it will be necessary to overhaul private rental legislation in relation to landlords responsibilities.’</p>	<p>Accepted – The Housing Executive recognises the challenges associated with the provision of services in rural areas and this will be a key consideration in the implementation of the Chronic Homelessness Action Plan.</p> <p>Accepted – Non-accommodation based issues will be brought forward as part of the Inter-departmental Homelessness Action Plan which is referred to in revised Objective 7.</p> <p>Noted – As noted earlier in this document this comment will be brought to the Department for Communities for consideration.</p>
Individual Response 2	<p>‘Chronic homelessness is not clearly defined within the Chronic Homelessness Action Plan, with two definitions being listed: ‘a group of individuals with very pronounced and complex support needs who find it difficult to exit from homelessness’; and, ‘long term users of emergency services, in particular rough sleepers.’ If the former definition is to be adopted it should be reconsidered on the basis that it renders the experience of chronic homelessness dependent on the presence of very pronounced and complex support needs. While this is often the case, it is not exclusively so. A simple reformulation - such as ‘a group of individuals who find it difficult to exit from homelessness, often with very pronounced and complex support needs’ – would allow the focus of the strategy (i.e. homelessness) to be foregrounded while also creating a less restrictive definition.’</p> <p>This response contains detailed commentary on the criteria which has been considered in the consultation response.</p> <p>‘While the plans clear articulation of the links between the proposed aims and objectives is a notable strength, the document lacks clear key performance indicators and by extension the mechanisms required to clearly evaluate the efficacy (or otherwise) of the action plan.’</p> <p>‘Many of the outcomes associated with this (and other) objectives are generic in nature – such as ‘promote prevention/early intervention’ – and at times closely echo or indeed replicate the associated action.’</p>	<p>Noted – These comments has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation. The definition ‘a group of individuals with very pronounced and complex support needs who find it difficult to exit from homelessness.’ was taken from a Crisis report 2010 ‘A Review of Single Homelessness in the UK 2000 – 2010 Anwen Jones and Nicholas Pleace’, Crisis (2010). The criteria has been reviewed as agreed through the Central Homelessness Forum and it will be used as the classification for those individuals who are experiencing chronic homelessness and not this definition.</p> <p>Noted – The implementation Plan for the Action Plan will include timescales for milestones within the Chronic Homelessness Action Plan. When the criteria is determined and data collection commences clear performance indicators will be developed.</p> <p>Accepted – This comment refers to revised Objective 2 where there are clear links between what we will do and how we do it. The outcomes have been refined to ensure they do not replicate the action.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>'The action plan in its current form risks supporting the development of a range of diverse initiatives that are not easily measurable or clearly linked to preventing and reducing chronic homelessness. In light of this, key performance indicators for the prevention and relief of chronic homelessness should be developed, with the actions and outcomes listed in the current CHAP revised to ensure a clear link to the given indicators. Where outcomes are dependent upon actions listed in the IDHAP or HS, this should be clearly indicated in the body of the action plan itself.'</p>	<p>Accepted – The action Plan has been amended to set out clearly outline the benefits of the Action Plan. Measuring Success indicators have been included in Chapter 10 which sets how the objectives and actions have outcomes and measurable indicators. When the criteria is agreed and data collection commences targets and indicators will be measurable to ensure outcomes and actions are completed. The implementation Plan for the Action Plan will include timescales where possible. Responsibility for each action is clearly set out in the action plan at present.</p>
<p>Individual Response 3</p>	<p>'Some of the criteria could perhaps be joined into one with a broader definition giving more flexibility in interpretation. We need to be careful that set rigid criteria does not exclude others like those with under diagnosed, learning disabilities, behaviour issues or ethnic minority groups who may experience chronic homelessness e.g. non EU nationals.'</p>	<p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation.</p>
<p>Law Centre NI</p>	<p>'Law Centre NI is particularly concerned about the situation of undocumented or irregular migrants. This may include people who are entitled to have recourse to public funds as a British citizen or person with indefinite leave to remain, but do not have the documents to prove it.'</p> <p>'Law Centre NI welcomes the fact that Article6 (D) 1 of the Housing (Amendment) Act (NI) 2010 provides for free advice in relation to homelessness and the prevention of homelessness to be made available to all persons, including those subject to immigration controls.'</p> <p>'Law Centre NI emphasises that it is vital that migrants, both EEA and non-EEA nationals, who need to regularise their immigration status in the UK can access homelessness prevention support and immigration advice.'</p>	<p>Noted -The Housing Executive makes every effort to support people in this type of situation to confirm evidence required to make final decisions. The Housing Executive has considered the needs of marginalised groups as they are specifically referenced in revised Objective 2 where there is an action to 'Improve accessibility for marginalised groups including advice to PFA who are ineligible for housing assistance,' which includes working with other agencies to establish methods to identify this group.</p> <p>Noted and accepted - The Housing Executive fully accepts this point and are happy to work with organisations like the Law Centre. Where language becomes an issue we will make documentation available.</p> <p>Noted and accepted – The Housing Executive will continue to make every effort to provide relevant services, advice and assistance to all those presenting as homeless.</p>
<p>MACS Supporting Children and Young People</p>	<p>'We feel the criteria is comprehensive and broad enough not to exclude the young people we support. We welcome the addition of criteria 7.'</p> <p>'Is there something that NIHE can do to lobby to ensure YP are not financially exploited by landlords and that there is a quality of access to housing? This is because in our experience YP do not get same access to private rental property due to their age and financial capability.'</p>	<p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation.</p> <p>Noted – As noted earlier in this document this comment will be brought to the Department for Communities for consideration. Actions supporting access to the Private Rented Sector are included in the Action Plan. We are committed to exploring a range of actions included in revised Objective 3, to promote the PRS including the delivery of a successful Private Rented Sector Access Scheme and exploring new options and methods to incentive and mediate with landlords to provide properties for individuals who are experiencing chronic homelessness.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>'We would advocate a specific model of Housing First for Young People. As part of End Youth Homelessness we are currently linking in with the Rock Trust (Edinburgh) to explore their Housing First Europe Hub and Housing First 4 Youth programme. This would have a funding resource implication.'</p> <p>We are in favour of extending 28 days to 56 days to deal with threatened homelessness.</p>	<p>Accepted – This will be considered in the development of services associated with the Chronic Homelessness Action Plan.</p> <p>Young people are reflected in the consultation. We address the impact of chronic homelessness on young people, for example, the criteria for chronic homelessness has been amended to reflect 'looked after' young people and revised Objective 2 sets out our commitment to look at Adverse Childhood Experiences and how this can be used as a chronic homelessness indicator. We are committed in revised Objective 6 to consider a range of housing options including supporting the provision of a Housing First approach, which is not age specific. The service and support are based on the individual needs of the recipient and are not generic.</p> <p>Noted – The Housing Executive has committed to reviewing homelessness legislation as part of revised Objective 7.</p>
<p>Mid Ulster District Council</p>	<p>'Homelessness caused by affordability of rental properties is becoming a major issue, particularly in the Dungannon town area.' The response also notes a number of issues in relationship to affordability, Local Housing Allowance rents, Housing Association rents and allocations.</p> <p>'Council along with its community planning partners identified housing as a key priority for Mid Ulster.'</p> <p>'Council recommend the following action:</p> <ul style="list-style-type: none"> • purchase of land and development of mixed housing types by the Housing Executive; • widening the offering of 'Affordable Housing' by Housing Associations, enabling citizens the opportunity to avoid rental market pressures and accessing low cost home ownership; • upscaling purchases of new and existing housing from the open market by social housing providers. • enforcement of policy on new build private developments to ensure delivery of social and affordable housing at appropriate rate based on housing need; • clearance schemes to see demolition and rebuild of older social housing schemes to prevent high levels of housing unfit. <p>The consultation response notes comments with regards to the current unsuitability of the criteria.</p>	<p>Noted – As noted earlier in this document this comment will be brought to the Department for Communities for consideration.</p> <p>Actions supporting access to the Private Rented Sector are included in the Action Plan. We are committed to exploring a range of actions included in revised Objective 3, to promote the PRS including the delivery of a successful Private Rented Sector Access Scheme and exploring new options and methods to incentive landlords to provide properties for individuals who are experiencing chronic homelessness.</p> <p>Noted – The Housing Executive chairs a Homelessness Local Area Group and would be keen to link in with the Council community planning partners to improve inter-agency working in Mid Ulster.</p> <p>Noted – As noted earlier in this document this comment will be brought to the Department for Communities for consideration.</p> <p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>'The consultation document says that the Housing Executive Equality Unit has reviewed and confirmed that the Equality Screening template developed for the Homeless Strategy is applicable to the Chronic Homelessness Action Plan. The Equality Commissions audit of inequalities identified unequal access to social housing affecting Catholics, a section 75 group. It is difficult to see how a policy that diverts funding and resources away from the wider category of those in urgent need of social housing towards a subset of that category, described as in chronic need, can be automatically regarded as having no equality implications. Council request that the Housing Executive consider the impact of this further categorisation on unequal access to social housing affecting the Catholic community in particular.'</p>	<p>Not accepted - We note the points made however, the Chronic Homelessness Action Plan is a component part of the wider Homelessness Strategy and implementation plan which runs from 2017-2022. When we equality screened this, it was agreed that 'equality' would be given consideration during the life of the Strategy to ensure that measures were adopted as required to address specific housing inequalities as they arose or were identified. The issue you raise around the unequal access to housing for Catholics is an important and significant issue for Housing Policy and Strategy generally and not just Homelessness Policy and Strategy. We apply a range of policies to address this issue including how we develop the Social Housing new build programme, the wide ranging Community Cohesion programme which includes building reconciliation in communities, shared neighbourhoods, shared communities and re-imagining etc all aimed at widening housing choice for all. These and other policies and strategies can be seen in our most recent Corporate and Business Plans and Housing Investment Plans.</p>
<p>Northern Ireland Housing Council</p>	<p>To ensure effective delivery of the Plan, Members feel that an inter-departmental and multi-agency approach is vital, as homelessness is not solely a housing issue and also should be financially contributing.</p>	<p>Noted - This comment can be brought forward for consideration at Homelessness Strategic Steering Group (HSSG) and the Department for Communities.</p>
<p>Participation and the Practice of Rights</p>	<p>'We find the chronic homelessness action plan problematic and concerning because it doesn't address the housing shortage, enforced destitution of refugees and asylum seekers or the hurdles to gain FDA status.'</p>	<p>Noted – As noted earlier in this document the issue of housing supply will be brought to the Department for Communities for consideration. The issue of destitution of refugees and asylum seekers or the hurdles to gain FDA status are issues which cut across government departments and are respectively properly matters for government policy and any associated legislative competence and as such are beyond the remit of the Chronic Homelessness Action Plan.</p>
<p>Probation Board For Northern Ireland</p>	<p>'PBNI suggest that the wording of Criteria 7 'An individual who has encountered the criminal justice system' should be revised to 'an individual who is currently engaged with the criminal justice system'.</p> <p>'PBNI submit that it is important to have an accurate way for NIHE to count those who meet the criteria for chronic homelessness/ It is also important that all agencies are familiar with the correct terminology and that a common language is used to describe these individuals across agencies.'</p> <p>'PBNI welcomes the NIHE's initiative to develop mechanisms across agencies for early identification of those who are assessed as at risk of homelessness or chronic homelessness and will review its own processes in line with this. Consideration will be given to training PBNI staff so they can establish if their service users meet the criteria of chronic homelessness. Adverse Childhood Experiences (ACEs) could be used as an indicator for early identification of chronic homelessness.'</p>	<p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation.</p> <p>Accepted – The Housing Executive will count those who meet the criteria for chronic homelessness using our Housing Management System. A key priority will be working with other agencies to ensure consistency in implementation/interpretation.</p> <p>Noted – The use of Adverse Childhood Experiences (ACEs), as an indicator for early identification of chronic homelessness is included in the Action Plan. Revised Objective 2 sets out our commitment to look at Adverse Childhood Experiences and how these can be used as a chronic homelessness indicator.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>‘It would be useful for the Housing Executive to share information on what support services are available and also to look at extending good practice across NI. It is important that the Housing Executive collate and review the views of service users.’</p> <p>‘Consideration should be given to time limiting these arrangements to ensure scarce resources are focused on those individuals most in need. It is important there is a protocol within prisons to explore housing options for prisoners prior to their release.’</p> <p>‘We acknowledge current good practice in this area such as the Housing Solutions model, dedicated Housing Advisors for Approved Premises and rent guarantee schemes but would submit more needs to be done to assist in securing move on accommodation for individuals who have left prison and have complex needs.’</p> <p>‘It would be useful if all agencies were working from the same definition of what constitutes chronic homelessness.’</p> <p>‘PBNI would submit that such mechanisms should include measuring the impact and difference made by the implementation of the Chronic Homelessness Action Plan as per Outcome Based Accountability.’</p>	<p>Accepted – As part of the Homelessness Strategy the Housing Executive has developed Local Service Directories which will be uploaded to the Housing Executive website before the end of 2019.</p> <p>The Housing Executive will seek additional opportunities on an ongoing basis to engage with service users beyond the Service Users Forum. This is reflected in the action ‘Explore other mechanisms for capturing service user experiences of chronic homelessness’ contained in revised Objective 1.</p> <p>Accepted – This will be considered as part of the ongoing development of a Prisoners Protocol which is being led by the Homelessness Policy Unit within the Housing Executive.</p> <p>Noted – The Housing Executive acknowledges the challenge in providing temporary accommodation for those who have left prison and who have complex needs. The Housing Executive is keen to work with the Probation Board for Northern Ireland to explore additional or alternative options in terms of the provision of such accommodation.</p> <p>Accepted – This will be a priority within revised Objective 1.</p> <p>Accepted – The action Plan has been amended to set out clearly the benefits of the Action Plan. Measuring Success indicators have been included in Chapter 10 which sets how the objectives and actions have outcomes and measurable indicators. When the criteria is agreed and data collection commences targets and indicators will be measurable to ensure outcomes and actions are completed.</p>
<p>Rural Residents’ Forum</p>	<p>The chronic homelessness action plan identifies access for people from abroad with no recourse to public funds as an “ongoing issue”. RRF is concerned that the action plan only refers to free advice in relation to homelessness and the exceptions for those with care needs and for those under 18.</p> <p>RRF would hope to see the Housing Executive move as quickly as possible to developing actions that will address chronic homelessness.</p> <p>RRF agrees that the data collected on Chronic Homelessness should be disaggregated by urban and rural locations to allow the Housing Executive to consider in more detail the rural needs implications of this developing area of work.</p>	<p>Not accepted - The tests within the current homelessness legislation particularly regarding eligibility are beyond the remit of both the Housing Executive and the Chronic Homelessness Action Plan. The Housing Executive has considered the needs of marginalised groups as they are specifically referenced in revised Objective 2 where there is an action to ‘Improve accessibility for marginalised groups including advice to PFA who are ineligible for housing assistance,’ which includes working with other agencies to establish methods to identify this group.</p> <p>Accepted – The implementation of the Action Plan has already started and actions have already been carried out to address chronic homelessness e.g. various research projects and homelessness prevention funding made available.</p> <p>Accepted – When the criteria is determined and data collection commences indicators will be developed to ensure outcomes and actions are reflective of urban and rural needs.</p>

Table continues

Consultee	Consultee Response	NIHE Response
<p>Shelter NI</p>	<p>‘The criteria provided allows little scope to quantify those at risk of facing chronic homelessness, which precludes the opportunity for preventative measures. Suzanne Fitzpatrick’s work on Homelessness prevention in the UK: Inter-jurisdictional contrasts refers to conceptualising prevention that could provide a better basis for discussion of criteria.’</p> <p>‘Engagement with stakeholders to review criteria and definitions.’</p> <p>‘The PRS is not a good place for vulnerable people. It does not have the regulations necessary to provide the equivalent protection for tenants of social housing. Combine this with Universal credit, and capped LHA, the PRS is not an affordable option. A strategy to help chronically homeless people that looks to “incentivise” landlords in the PRS is an extraordinary idea that will not solve the dire shortage of available and affordable suitable housing. Private landlords are in the housing business to make a profit, even where this means vulnerable tenants are exploited.’</p> <p>‘As has been done in other parts of the UK, we should demand legislation to impose a statutory duty on relevant agencies, so they have a legal duty to collaborate with the NIHE to address homelessness and to prevent and relieve homelessness.’</p> <p>‘The Housing First model should be deployed as a solution to this objective as opposed to the “rapid rehousing approach”. A person centred approach is all well and good but there must also be consideration for the physical condition of accommodation provided.’</p> <p>Comments regarding Objective 8 - ‘This is very similar to Objective 7, it doesn’t make much sense to separate them.’</p> <p>‘The Housing First Approach does not need to be reserved only for those with multiple needs beyond housing. To make a game change, we need to roll out the Housing First approach as a first option.’</p>	<p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation.</p> <p>The criteria and recording mechanism on the Housing Management System is planned to capture those at risk of chronic homelessness. Revised Objective 2 also sets out how we want to work across agencies for the early identification of those at risk of chronic homelessness for example, by looking at adverse childhood experiences and how these can be used as an indicator. We want to use the information collected about those at risk to promote prevention through for example, referral to appropriate services.</p> <p>Accepted – As part of the consultation response the Housing Executive has engaged with the Central Homelessness Forum and has engaged with stakeholders as part of the review of the criteria referred to in revised Objective 1.</p> <p>Noted – Response to note that only those who are capable of living in the PRS will be placed in the PRS. The PRS is seen as one of a range of potential solutions in conjunction with appropriate support. Where suitable private rented accommodation is available we want to remove barriers by the use of incentives.</p> <p>Noted – As noted earlier in this document this comment will be brought to the Department for Communities for consideration.</p> <p>Noted – Housing First is a standalone objective that will be considered in the implementation of all other objectives. Housing First is considered as a solution as part of the need to apply a rapid rehousing approach.</p> <p>Not accepted – Revised Objective 5 relates to the provision of temporary accommodation, the ethos, supply and demand whereas revised Objective 6 is reflective of the need for the right type of permanent accommodation which includes Housing First.</p> <p>Not Accepted – Research would indicate that Housing First is only suitable for the chronic homelessness. Appendix B Chronic Homelessness Action Plan contains a section on research which includes Housing First</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>Communication and engagement with stakeholders, charities and the homelessness sector must play a significant role. Homeless people including people who are defined as chronic homeless should be given a prominent role in the consultation and action plan.</p> <p>The Strategy makes no commitment to seeking increased funding, or reference to the environment of funding cuts to welfare, health services, SP programmes, etc, and makes no reference to the reality tenants face in the PRS and the effects of Home Office policies on asylum seekers, many of whom are destitute. Poverty is a main driver of homelessness and destitution is its worst manifestation. If Homelessness is an extreme form of exclusion within Society, then addressing Chronic Homelessness is a fundamental challenge to us as citizens and public servants. You cannot ignore these realities when devising an action plan.</p>	<p>Noted – The Housing Executive has engaged with the Service User Forum as part of the consultation process. The Housing Executive will seek additional opportunities on an ongoing basis to engage with service users beyond the Service Users Forum. This is reflected in the action ‘Explore other mechanisms for capturing service user experiences of chronic homelessness’ contained in revised Objective 1. The action plan also shows our commitment to working on an interagency basis and this is reflected in revised Objective 7 ‘Promote inter-agency issues and actions required to address chronic homelessness’ and in our implementation structures.</p> <p>Noted – Some of these comments are outside the remit of the Housing Executive but will be referred to the Department of Communities and raised at HSSG for consideration.</p> <p>The Action Plan has been developed in consultation with the homelessness sector and the Department for Communities. The actions under each objective have been set out in 2 stages, actions which we can carry out now and actions which can be carried out with more resources. We already successfully submitted a bid for a number of actions where we have already commenced implementation.</p>
Sinn Féin	<p>This response provides detailed commentary on the criteria including reference to aspects guided by current legislation e.g. intentionality.</p> <p>The Housing Executive says it will identify those who meet the criteria for chronic homelessness through direct engagement extended across all offices (p.5). However accessibility difficulties exist for many people experiencing, or at urgent risk of, chronic homelessness that are required to attend Housing Executive offices for interview. Many of them will have already encountered attitudes, practices and processes within the Housing Executive which have inhibited the proper assessment of these people’s needs and ultimately their access to appropriate services.</p> <p>Scotland’s Sensitive Practice Initiative (SSPI) is also a useful model that should be considered. Although SSPI is primarily focused on ensuring equality of access to health services, it aims to identify specific barriers within an institution’s own practice and seeks to develop different ways of working to ensure greater participation by marginalised groups. The Housing Executive should explore the adoption of this approach in relation to developing its chronic homelessness strategy.</p>	<p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation.</p> <p>Not accepted- Housing Advisors and Patch Managers are highly trained to assess the most vulnerable cases in a professional and sensitive manner. The Housing Executive is always seeking ways to improve training and skills of those dealing directly with the public. Arrangements can be made to conduct interviews away from the Local offices in appropriate settings.</p> <p>Noted –The Housing Executive are committed to identifying and meeting the needs those experiencing chronic homelessness and will continue to work with our partners in other departments e.g. Department of Health to address any inequalities in the provision of services. This comment will be brought to the HSSG and Department for Communities for consideration.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>While the consultation document mentions ‘the impact of chronic homelessness on an individual or a household’ it focuses, without explanation on “the development of criteria to define an individual”. This distinction may be important, perhaps chronic homelessness affecting a household (with or without children) sets in motion a very different statutory response, but, as it stands, the document is unclear about why there is this distinction.</p> <p>‘Sinn Féin shares the view that street counts do not include all of those sleeping in vulnerable circumstances, such as in derelict buildings and sheds, in their cars or sofa surfing. The Housing Executive counted 38 rough sleeping in a single night and it is proposed that this method will be followed annually to measure numbers. Extracting figures from a single night-known as a snapshot-is unsatisfactory and is likely to significantly underestimate the number of people rough sleeping. Data needs to be collected over a longer time span from all agencies (PSNI, Health trusts, NIHE, Homeless organisations) so that hidden sleepers or those rough sleeping who may be known to be in hospital or found shelters that night, are counted.’</p> <p>Given the responsibilities of the Housing Executive and the designation of Scotland and the north of Ireland as a single jurisdiction in relation to British Home Office policy and provision, what actions, including additional support, have the Housing Executive taken to avoid chronic homelessness amongst asylum seekers living here and awaiting appeal?</p> <p>The Housing Executive should be working with Social Services rather than just ‘referring’ applicants ineligible for assistance under the Housing Order 1988 but who are destitute.</p>	<p>Noted – The document already includes an acknowledgement in the introduction on page 4 of the Chronic Homelessness Action Plan that chronic homelessness can affect individuals or households. Further clarification will be included in the document regarding this. Additionally research on customer user journey’s carried out as part of the Homelessness Strategy will focus on the composition of different customer households.</p> <p>Noted- This comment will be addressed through revised Objective 1 where the Housing Executive has made a commitment to conduct street audits initially in Belfast, Londonderry and Newry. This will provide a more comprehensive understanding of the scale of street activity including rough sleeping. This information will be analysed to inform policy review and development and review of existing services and new service requirements. The Housing Executive are also committed in Objective One to carrying out street counts which are snapshot exercises conducted during one night to help us understand the scale of rough sleeping in Northern Ireland.</p> <p>Noted- The Home Office are responsible for asylum seeker legislation for all jurisdictions within the United Kingdom, including Northern Ireland. This comment is outside the remit of the Housing Executive but will be brought to the Department of Communities for consideration as any changes in policy would require legislative changes. The Housing Executive has considered the needs of marginalised groups as they are specifically referenced in Objective 4 where there is an action to ‘Improve accessibility for marginalised groups including advice to PFA who are ineligible for housing assistance,’ which includes working with other agencies to establish methods to identify this group.</p> <p>Noted – The Housing Executive will continue to work in partnership with Social Services in order to meet its legislative commitments to those applicants that are ineligible for assistance. As part of the action plan the Housing Executive are committed to improving accessibility for marginalised groups including advice for persons from abroad who are ineligible for housing assistance. Chapter 6 provides more details on the Housing Executive’s duty to those who have no recourse to public funds.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>‘Given the budgetary obligations attached to equality and human rights obligations, the reprioritisation of spending signals a significant change and this policy should be subject to a full Equality Impact Assessment. Universality in delivery does not exempt the necessity for an equality impact assessment where the impact or outcome of the policy may disadvantage a Section 75 group.</p> <p>Sinn Fein is concerned about the way in which unequal access to social housing continues to be framed by the Housing Executive. Page 5 of the Equality Screening document under the Section 75 category on religious belief states; “Availability of stock is often limited in the more popular areas with low turnover. Many of these areas are single identity which limits the choice with many households not fully aware of the full range of housing choices.”</p> <p>Sinn Fein believes unequal access to social housing is underpinned by mechanisms of sectarian discrimination, directly through intimidation or the threat of intimidation, and indirectly by the Department’s and Housing Executive’s use of notions of ‘choice’ and ‘popular’ demonstrated above. Notions of ‘choice’ and ‘popular’ in a situation where Catholics entitled to social housing can’t access empty social housing in many areas without being subject to sectarian hate crime is a form of indirect discrimination because it seeks to mask-rather than address-mechanisms of discrimination. In adhering to these notions, the Housing Executive becomes part of the problem with regards to unequal access.’</p>	<p>Not accepted - We note the points made however, the Chronic Homelessness Action Plan is a component part of the wider Homelessness Strategy and implementation plan which runs from 2017-2022. When we equality screened this, it was agreed that ‘equality’ would be given consideration during the life of the Strategy to ensure that measures were adopted as required to address specific housing inequalities as they arose or were identified. The issue you raise around the unequal access to housing for Catholics is an important and significant issue for Housing Policy and Strategy generally and not just Homelessness Policy and Strategy. We apply a range of policies to address this issue including how we develop the Social Housing new build programme, the wide ranging Community Cohesion programme which includes building reconciliation in communities, shared neighbourhoods, shared communities and re-imaging etc all aimed at widening housing choice for all.</p> <p>These and other policies and strategies can be seen in our most recent Corporate and Business Plans and Housing Investment Plans.</p>
<p>Social Democratic and Labour Party</p>	<p>This response provided detailed commentary on the criteria and this has been considered as part of the review of the criteria.</p> <p>‘The SDLP propose that the Service Users Forum meet on a bi-annual or tri-annual basis, to more effectively monitor and report on chronic homelessness. If service users are engaged more regularly, in a forum that captures their experiences, the Housing Executive could use such data to consider future housing models.’</p>	<p>Noted – This has been considered as part of the review of the criteria which was brought to the Central Homelessness Forum and Service User Forum following the consultation.</p> <p>The Service User Forum meets on a quarterly basis as part of the Homelessness Strategy and the commitment in the Chronic Homelessness Action Plan is to have at least one meeting per year focusing on the Chronic Homelessness Action Plan but this can be increased dependent on need. The agenda for the Service User Forum is based on the needs of service users. The Housing Executive seeks to establish new ways in which to engage with service e users and improve the qualitative information available.</p>

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Consultee	Consultee Response	NIHE Response
	<p>The SDLP recommend the Housing Executive consider establishing a dedicated task force, comprised of representatives from various organisations with expertise in asylum seekers and refugees to promote public awareness, advice and assistance to these marginalised groups.</p> <p>‘The SDLP strongly agree that placing people who are chronically homeless in housing is not enough to break cyclical/perpetual homelessness. Given the unregulated nature of the Private Rented Sector (PRS), and the accessibility, affordability, quality, security of tenure and sustainability problems experienced by many PRS tenants, especially those experiencing chronic homelessness, who come to our constituency offices for help, the SDLP would urge the Housing Executive not discharge its chronic homelessness duty to the PRS without checks and balances and clear support networks.’</p> <p>‘Firstly, given the context of Welfare Reform, especially the impact that Universal Credit poses and the current lack of social housing in areas of high demand and deprivation, the SDLP would like to acknowledge the decision by the Housing Executive to introduce the first Chronic Homelessness Action Plan, which realises the multi-faceted nature of chronic homelessness and the devastating impact homelessness has on individuals, families and wider society.’</p>	<p>Noted-. This comment can be brought forward as part of revised Objective 2 as the Housing Executive are committed to improving accessibility for marginalised groups including advice for persons from abroad who are ineligible for housing assistance through a number of initiatives including working with partner agencies.</p> <p>Noted – As noted earlier in this document this comment will be brought to the Department for Communities for consideration. The Housing Executive has a duty to those deemed to be statutorily homeless. There is no separate or additional statutory duty to those individuals experiencing chronic homelessness. The Housing Executive would however note that any discharge of duty around homelessness would only be made with the agreement of any applicant who wishes to avail of a private rented sector property as an alternative to social housing.</p> <p>Noted – recognition of the context of this comment has been a key driver in the development of the Chronic Homelessness Action Plan.</p>
<p>Steven Agnew MLA</p>	<p>‘Chronic homelessness is not primarily a housing problem; it is a manifestation of the problems in the personal and social lives of our most vulnerable citizens. A housing-led approach tackles the symptoms not the underlying causes. These causes need to be addressed upstream by preventative strategies delivered by combined social services. A successful programme must be co-designed and co-financed by the Departments of Health, Justice and Education as well as the Department for Communities, with the Executive ensuring that there is sufficient ring-fenced funding for meaningful intervention. And there must be input at every stage from the third sector, which has the most detailed knowledge and understanding of the individuals who are being targeted.’</p> <p>‘Subject to this caveat, I agree with the proposed actions. However, I note that a large number of them consist of research and analysis, which are cost neutral. While it is important that policy is evidence-based, concrete action is needed now. The NIHE should urgently seek funding to implement the proposed actions which require additional resources.’</p>	<p>Accepted - The Chronic Homelessness Action Plan and Homelessness Strategy noted the importance of inter-agency working. This importance is evidenced in the development of an Inter-departmental Homelessness Action Plan which aims to deal with non-accommodation based issues relevant to both documents. The Action Plan also reflects our continued commitment of engagement with the sector and to the strategy delivery mechanism which includes the Central Homelessness Forum and the Local Area Groups.</p> <p>Accepted – The Housing Executive will be engaging with relevant internal and external stakeholders to secure the additional funding referred to.</p>

Table continues

Consultee	Consultee Response	NIHE Response
	<p>‘Staff training is vital in the correct assessment of the client group against the criteria. These clients are wary of the statutory sector and may not give a true account of themselves to staff. According to the external research quoted in the consultation it is expected that 5-10% of the homeless population is chronically homeless, but the HE area offices using their current records or anecdotal information only identified 2% as meeting the new criteria. This suggests that the NIHE is only getting a partial picture. When assessing clients they must work closely with the voluntary sector, who know the client group and their individual stories.’</p> <p>‘It is stated that the action to collect data from other agencies using the new standard indicators is subject to increased resourcing. I would argue that data from other agencies and the voluntary sector needs to be collected in year one in order for NIHE to have an accurate baseline.’</p> <p>‘Given the poor experience many chronically homeless people have with statutory agencies, they will be unlikely to attend a user group run by the NIHE. The NIHE should commission the voluntary sector to run the Service Users Forum.’</p> <p>‘In order for the right specialist support to be provided, it must be jointly funded by Supporting People and the Department of Health, and this funding must be ring-fenced. There are differences in funding and service provision in different Trust areas and if people move, the support they are used to in one area may not follow them to another.’</p> <p>‘It is essential to provide more accommodation through the PRS, but this must be secure, affordable and of good quality. I welcome initiatives to incentivise private landlords to provide properties for individuals experiencing chronic homelessness as long as the tenancies are sustainable. Short-term tenancies can create a ‘revolving door’ with the individual homeless again at the end of a year. The quality of many affordable PRS properties are sub-standard, with tenants reporting problems such as damp, broken heating, cookers only partially working, which they have difficulty getting the landlord to fix. Often they are scared that if they complain they will lose their tenancy. The NIHE must monitor the private rental properties they use and work with landlords to ensure that the properties are of good quality and are well-maintained throughout the tenancies.’</p>	<p>Accepted – The Housing Executive will ensure that staff are provided with the appropriate training. While the numbers referred to in the draft Action Plan were indicative the Housing Executive would note the difficulties in providing this data on a historical basis and this may have led to the underrepresentation noted in this response.</p> <p>Noted – The Housing Executive would agree with this point but is mindful of the challenges associated with the collection of this data from other agencies. While the Housing Executive will aim to achieving at the earliest possible point in time we are mindful that any commitment to do so in Year 1 would be providing a commitment on behalf of other organisations which we are unable to do so.</p> <p>Noted – The Council for the Homeless Northern Ireland has been commissioned to administer the Service User Forum on behalf of the Housing Executive as part of the Homelessness Strategy 2017-22.</p> <p>Noted – As noted earlier in this document this comment will be brought to the Department for Communities for consideration.</p> <p>Noted – As noted earlier in this document this comment will be brought to the Department for Communities for consideration.</p> <p>This will be considered as part of revised Objective 3 where a number of actions have been included to support access to the private rented sector and security of tenure including the delivery of a successful Private Rented Sector Access Scheme and exploring new options and methods to incentive landlords to provide properties for individuals who are experiencing chronic homelessness. We will only the PRS where it is a sustainable solution and security of tenure.</p>

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Consultee	Consultee Response	NIHE Response
	<p>'I support the review of temporary accommodation. However, in the present housing crisis there is a need for temporary housing as well as emergency accommodation.'</p> <p>'It is important that other homeless individuals and families are not adversely affected by prioritising the chronically homeless. Housing First requires the Housing Executive to pay rents over the LHA rate to private landlords. In order for these tenancies to be sustainable, there will have to be a long-term commitment by the Housing Executive to meeting the shortfall in rent. To promote fairness, additional help with rent should be widely available to other homeless individuals and families when there is no suitable private rental accommodation within the LHA rate. This is normally done through DHPs, but being discretionary they are short-term and insecure. Homeless individuals and families rehoused in properties where the rent is above the LHA rate need to be given the assurance that their rent will be met in the longer term.'</p> <p>Agencies must work together not just to support those experiencing chronic homelessness but also to better identify those at risk. Scottish research has demonstrated that people have increased interactions with health services prior to becoming homeless. Objective 9 should be more ambitious in proposing inter-agency preventative strategies using pooled data and resources. The budget must be amalgamated across departments and ring-fenced to that it is secure and cannot be reduced in the face of other pressures.</p>	<p>Noted – The research element of the Strategic Review of Temporary Accommodation is due for completion in 2019/20. This forms of a wider project which will inform the development of Temporary Accommodation Action Plan.</p> <p>Noted – As part of the broader Homelessness Strategy we are looking at longer term housing solutions and how we address the issues of security of tenure and affordability.</p> <p>Accepted – Non-accommodation based issues will be brought forward as part of the Inter-departmental Homelessness Action Plan which is referred to in revised Objective 7. Actions supporting improved interagency working are also included in revised Objective 7 to be addressed for example, through the Inter-departmental Homelessness Action Plan. The Housing Executive is also committed in the actions included in revised Objective 2 to supporting joint working arrangements including review of existing protocols to improve those relationships. Measuring Success indicators have been included in Chapter 10 which sets how the objectives and actions have outcomes and measurable indicators. The Housing Executive is looking at indicators which will focus on prevention work.</p>
<p>Supporting Communities</p>	<p>'In a general response to the Homelessness Action Plan, we previously welcomed the acknowledgement that tackling homelessness is not the responsibility of a single agency nor indeed government acting on its own. Homelessness is a many faceted and complex issue which manifests itself in very many different ways; there are many deep-rooted and underlying issues in the housing market and in our communities, which need to be addressed if effective remedies and prevention of homelessness is to be achieved. We agreed with the Vision Statement as it draws in and requires the input of many actors, including the voluntary and community sector.'</p> <p>'We therefore welcome the publication of this Action Plan and offer our support to the Housing Executive in completing this work.'</p>	<p>Accepted – The Chronic Homelessness Action Plan and Homelessness Strategy noted the importance of inter-agency working. This importance is evidenced in the development of an Inter-departmental Homelessness Action Plan which aims to deal with non-accommodation based issues relevant to both documents.</p> <p>Noted – The Housing Executive will be keen to work with Supporting Communities and the Central Housing Forum (or any other groups aligned to Supporting Communities) in the implementation of this Action Plan.</p>

Table continues

Consultee	Consultee Response	NIHE Response
University of Birmingham, School of Sport, Exercise and Rehabilitation Sciences	This response has noted a number of projects led by the University of Birmingham that may be relevant to the Chronic Homelessness Action Plan. This response highlights the 'benefits of preventions programmes that have resulted from inter-agency working and some of the key lessons learned'.	Noted – These have been considered in the work associated with the redraft of the Chronic Homelessness Action Plan.

This document is available in alternative formats.

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