



PPR consultation response 25 January 2022

**(1) *Ending Homelessness Together Strategy 2022-27 and***

**(2) *Homeless to Home draft strategic action plan for temporary accommodation***

If the Housing Executive's draft *Ending Homelessness Together Strategy 2022-27 and Homeless to Home draft strategic action plan for temporary accommodation* are anything to go by, the Housing Executive has learned some key lessons from the Covid-19 pandemic and may well apply them going forward. What will matter more than what's written in the guidance is how it is applied in real life.

Homelessness is an acute violation of the right to housing, and the Housing Executive is required by NI law to publish its strategy for combatting it every 5 years. The overall aim of this new one is straightforward: "*wherever possible homelessness should be prevented; but if homelessness cannot be prevented it should be rare, brief and non-recurring*".

This draft improves on past policy by embedding -- on paper at least -- **involvement of people with lived experience of homelessness** in the design and delivery of services<sup>1</sup> through a person-centred, evidence-based and responsive approach. This is a potentially positive step: co-design is the first principle in the [Vision Statement](#) developed by the [Take Back the City coalition](#) of people in acute housing need alongside housing professionals, for a sustainable and inclusive community housing project at the Mackies site in west Belfast, for instance. The key will be whether the Housing Executive is able to deliver the co-design and co-production elements meaningfully rather than tokenistically -- going to where people are, willing to hear uncomfortable truths and committed to taking them on board.

Both draft policies prominently cite a British Academy [study](#) highlighting the need for sustained state resources and effort to meet the long-term societal impacts of Covid-19. Homelessness is described as "*an outworking of economic, social, health, housing and educational inequalities and problems*". There are increased resources for **preventing** people becoming homeless, and more **tenancy support** for people newly placed in permanent homes.

---

<sup>1</sup> This would be through an eventual Homelessness Lived Experience programme. The involvement of homeless or formerly homeless people in monitoring and evaluation of these policies and associated programmes was not made clear in the texts, but would also be crucial.

The "*lack of affordable, accessible permanent accommodation*" is flagged as a serious blockage, reinforcing calls from a multitude of sources, [PPR and #BuildHomesNow included](#), for more social homes.

[Housing First](#), the approach which provides settled housing as a first response to chronically homeless people without requiring that they have already overcome their addictions and other issues, will be extended. Calls for enforceable **standards for temporary accommodation** are mentioned -- though not made into a concrete aim.

However, despite recent Housing Executive-commissioned [research amongst homeless service users and others](#) highlighting the need "*to ensure that no-one who is homeless is overlooked or excluded*" (8.3) -- there are red flags.

## 1. Child homelessness

Since 2018 -- [building on](#) its [earlier housing campaign](#) work -- PPR has been [regularly requesting Housing Executive data](#) on **children growing up in families on the waiting list, in housing stress and homeless**. The Freedom of Information responses indicated that the Housing Executive did not systematically identify and monitor how many of these children there were on its waiting list over time; every year we've had to [work the total out ourselves](#) from their overall household data.

The fact that there are children amongst us who have spent their lives [without a permanent home](#) is an indictment of our priorities. Being homeless, and the stresses and harm this causes within a family, impact children's [development](#) and [education](#) in ways that are potentially long-term and life-changing for them.

From a legal standpoint, it raises clear concerns in terms of compliance with Section 75 of the Northern Ireland Act, which places a statutory obligation on public authorities to carry out their functions with due regard to the need to promote equality of opportunity in respect of key categories -- including age. Another category is religious belief -- also relevant here, as we know that in areas like [North Belfast](#) and [West Belfast](#), acute housing need, including homelessness, is [concentrated](#) in predominately Catholic areas. (See the interactive [Take Back the City map](#) for information.)

However, barring some small advances (a promise of alternatives to hotels and B&Bs for families with children; a reference to future potential research into the impact of homelessness and temporary accommodation stays on children), **child homelessness continues to pass largely under the radar in these draft policies**<sup>2</sup>. This must change going forward.

## 2. Homeless people without FDA status

Another area of great concern is the cohort of homeless people who do not have official FDA status. One such group is made up of **homeless people who have applied but been denied FDA status**. In 2020/21, only 9,889 of the 15,991 households (62%) that presented as homeless

---

<sup>2</sup> Additionally, as discussed in a 21 January 2022 [news article](#) and subsequently, people die on the waiting list as well as growing up on it: 217 in the last year alone.

were accepted<sup>3</sup>. The remainder were "not owed a full housing duty" as they failed to meet at least one of the four statutory criteria (eligibility, homelessness, priority need and intentionality).

Pre-pandemic, PPR supported the [Homeless not Voiceless](#) group of people who had been denied Full Duty Applicant status -- often for reasons that were not clear to them, their peers, support workers, PPR or anyone other than the Housing Executive staff who made the call. The draft strategy says that it "ensures the provision of appropriate support services" to this group, but there is no detail about what this means, or which if any of the proposals made in the draft policies apply to them.

Equally of concern are **homeless people who have not even applied for FDA status**. The Housing Executive-commissioned [research paper](#) underpinning the strategy noted "a perception amongst some young single people (particularly males) that there is little point in applying to the Housing Executive for accommodation as they will be deemed to have no priority need" (3.18). The draft policy refers to partner organisations potentially identifying such cases of 'hidden homelessness', but again offers little substance.

For both of these groups, what is missing is a **frank and participatory interrogation of the current criteria, how they are applied, who they are excluding, why and what to do about it**. This effort to [remove barriers](#) to homeless people accessing support has taken place to an extent in Scotland; as a result, since end 2019 local authorities are [no longer required](#) to investigate whether an applicant is 'intentionally' homeless. 'Intentionality' remains a criterion here, however; the same exercise is clearly needed, but at the minute it's the elephant in the room.

Finally, another key group in this area is made up of foreign nationals deemed to have **No Recourse to Public Funds**, including (often temporarily) refused asylum seekers as highlighted in various [reports](#) from [groups](#) supported by PPR. Pre-Covid, people with an NRPF designation are only explicitly entitled to advice about homelessness; but under the UK-wide 'Everyone In' public health initiative for rough sleepers, a Memorandum of Understanding was set up between the Housing Executive, the Department for Communities and the Department of Health to provide emergency shelter for them during the pandemic. Around 60 people were reportedly provided with housing under the scheme, however PPR and other organisations working with this community have witnessed the extent to which they face barriers accessing this support -- including overly restrictive interpretations of eligibility.

This agreement runs until at least the end of March 2022. The draft strategy includes an aim to

*explore alternative routes with the Department for Communities and the Department of Health through which to provide accommodation and support to people with no recourse to public funds when the current arrangements as part of the COVID-19 response end. (p. 39)*

---

<sup>3</sup> The text says there were some cases of repeat homelessness though it was not clear how this was reflected in the applicant / acceptance figures.

The Housing Executive and departments have the chance to embed a pandemic-era policy in the interest of a more humane future. There are opportunities to learn from approaches taken in Scotland in this regard, but as yet, seemingly little co-ordination or forward thinking. This area will be another telling indicator of how deep the new person-centred, responsive approach runs in the Housing Executive going forward.