

# Public Consultation

## Chronic Homelessness Action Plan

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

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

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

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

Helen Hicks, (Homelessness Policy & Strategy)

1<sup>st</sup> Floor South,

9 Lanyon Place,

Belfast,

BT1 3LZ

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

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

## **Freedom of Information Act 2000**

### **Confidentiality of Consultations**

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

The Freedom of Information Act gives the public the public a right of access to any information held by a public authority, namely the Housing Executive in this case. This right of access to information includes information provided in response to a consultation. However, it does have the responsibility to decide whether any information provided by you in response to this consultation, including information about your identity should be made public or treated as confidential.

The means that information provided by you in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances. The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- The Housing Executive should only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the Housing Executive's functions and it would not otherwise be provided.
- The Housing Executive should not agree to hold information received from third parties 'in confidence' which is not confidential in nature.
- Acceptance by the Housing Executive of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.

For further information about confidentiality of responses please contact the Information Commissioner's Office (or see the website at:

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

## YOUR DETAILS

**Organisation:** Participation and the Practice of Rights

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### Criteria for Chronic Homelessness

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

No

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

1. An action plan to deal with chronic homelessness should address head on the significant issue of enforced destitution and homelessness, affecting hundreds of people. It is not acceptable to only 'note the difficulty' of destitute asylum seekers and refugees and refer to 'free advice available'. More information on the impact of destitution and hostile environment policies can be found at <https://www.pprproject.org/resource-document/a-prison-without-walls-asylum-migration-and-human-rights>.

2. As described more fully in Homeless Action: human rights, homelessness & change ([https://issuu.com/ppr-org/docs/homeless\\_not\\_voiceless\\_report](https://issuu.com/ppr-org/docs/homeless_not_voiceless_report)), those recognised by the Housing Executive as having FDA status are only a subset of those who are actually homeless. In 2013/14, according to NIHE figures published in the annual progress report and homelessness strategy (appendix one, tables 1 and 4), just over half of 'homeless presenters' were given FDA status; in 2017/18 this had risen to 65%. According to the Housing Executive's annual progress report (p. 5), the increase "is reflective of the increasing complexity and vulnerability associated with homeless households".

Despite the rise, concerns remain that the method for awarding FDA status leaves some people who are clearly homeless, with nowhere else to go but a hostel, without official recognition.

In a snapshot of Housing Executive records from 25 June 2018 (obtained by Freedom of Information response of 29 Jun 2018), there were 19 cases of people living in shelters "in which the application has not, or not yet, been awarded 70 points for FDA Homelessness under the Housing Selection Scheme". In a snapshot of the same data on 21 March 2019, there were fewer than ten such cases in

Housing Executive records (FOI response, 4 Apr 2019). However, records held by the voluntary sector paint a different picture. On one day, 25 July 2018, in hostels run by one voluntary organisation only, there were 78 cases of homeless individuals without FDA status.

These discrepancies are deeply concerning. The system proposed in the Chronic Homelessness Action Plan is based on people with FDA status meeting at least 3 of a set of 7 additional criteria. The plan makes reference to 'hidden homelessness' (p. 10) but not to patently homeless people refused FDA status. How will the plan address chronic homelessness amongst those who have not made it past the first hurdle?

## Objective One

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

No

Please provide any supporting comments below:

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 - please see our comments at the start.

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

No

Please provide any supporting comments below:

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

[Click here to enter text.](#)

## Objective Two

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

No

Please provide any supporting comments below:

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 – please see our comments at the start.

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

No

Please provide any supporting comments below:

[Click here to enter text.](#)

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

[Click here to enter text.](#)

### **Objective Three**

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

No

Please provide any supporting comments below:

[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 – please see our comments at the start.](#)

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

No

Please provide any supporting comments below:

[Click here to enter text.](#)

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

[Click here to enter text.](#)

**Objective Four**

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

No

Please provide any supporting comments below:

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 - please see our comments at the start.

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

No

Please provide any supporting comments below:

[Click here to enter text.](#)

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

[Click here to enter text.](#)

**Objective Five**

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

No

Please provide any supporting comments below:

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 - please see our comments at the start.

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

No

Please provide any supporting comments below:

[Click here to enter text.](#)

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

[Click here to enter text.](#)

## **Objective Six**

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

No

Please provide any supporting comments below:

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 - please see our comments at the start.

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

No

Please provide any supporting comments below:

[Click here to enter text.](#)

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

[Click here to enter text.](#)

## **Objective Seven**

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

No

Please provide any supporting comments below:

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 – please see our comments at the start.

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

No

Please provide any supporting comments below:

[Click here to enter text.](#)

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

[Click here to enter text.](#)

## **Objective Eight**

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

No

Please provide any supporting comments below:

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 – please see our comments at the start.

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

No

Please provide any supporting comments below:

[Click here to enter text.](#)

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

[Click here to enter text.](#)

## **Objective Nine**



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

No

Please provide any supporting comments below:

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 - please see our comments at the start.

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

No

Please provide any supporting comments below:

[Click here to enter text.](#)

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

[Click here to enter text.](#)

### **Objective Ten**

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

No

Please provide any supporting comments below:

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 - please see our comments at the start.

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

No

Please provide any supporting comments below:

[Click here to enter text.](#)

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

[Click here to enter text.](#)

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

*Rapid rehousing and Housing First initiatives should be extended to all homeless households. However, pre-requisites for a scalable successful Housing First model are available social housing and accessible, responsive and effective support services. Neither are currently available, which makes their omission from this consultation absurd. In regards the former, the only answer in Belfast is to increase the supply of social housing on key sites within, or adjacent to, areas with high concentrations of homelessness; sites such as Hillview in north Belfast and Mackies in West Belfast*