

Public Consultation

Chronic Homelessness Action Plan

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.

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

Helen Hicks, (Homelessness Policy & Strategy)

1st 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 2nd 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

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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.

Yes

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

To consider the criteria, Council reviewed how the action plan was defining chronic homelessness particularly relating to the categorisation of homelessness.

In chapter 6 the definition of homelessness provided sets out 3 categories of homelessness namely, transitional, episodic and chronic homelessness. Each defines the circumstance of the homeless event however there is insufficient definition in each category which specified the level of support needs required.

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.

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.

Yes

Please provide any supporting comments below:

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.

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

Yes

Please provide any supporting comments below:

As well as alignment to the Programme for Government, NIHE should ensure alignment for the Community Plan for each local government district.

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.

Yes

Please provide any supporting comments below:

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.

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

Yes

Please provide any supporting comments below:

The implementation of some actions being entirely dependent on additional resource should be revisited. Public bodies have a duty to continuously improve their services and seek opportunities for efficiency. If these actions are considered a priority to support the most vulnerable people in society, then efficiencies must be found elsewhere to ensure the necessary resources are available.

The service users forum is a welcome step in keeping with Council's wish that services meet the needs of customers and that customers have the opportunity to influence those services.

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.

Yes

Please provide any supporting comments below:

Evidence based decision making at all levels in addressing chronic homelessness is required to ensure services are effective and efficient.

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

Yes

Please provide any supporting comments below:

Council would wish to emphasise the need to ensure data and trend information reflects both quantitative and qualitative perspectives, particularly given the sensitive nature of this work. Using informal methods of gathering information i.e. focus groups will assist in ensuring any evidence based approach effectively draws out the importance narrative as well as statistics.

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.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

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

Yes

Please provide any supporting comments below:

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.

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.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

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

Yes

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:

The triage service is welcomed, particularly the potential active role Councils' front line services could provide. However, given the level of vulnerability with this client group and the complexity of their needs, further detail is needed on the robustness and accountability arrangements in place for multi-agency case management. The risk of multiple services working with a vulnerable client at crossed purposes can seriously undermine the possibility of a positive outcome for that person and this risk should be urgently minimised.

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.

Yes

Please provide any supporting comments below:

Council is very aware of ongoing criticism that public services are not responsive and agile enough to meet the needs of the most vulnerable in society. We therefore welcome the commitment in ensuring services engage with those at risk of chronic homelessness as quickly as possible as that is the most effective way to ensure a positive outcome.

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

Yes

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.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

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

Yes

Please provide any supporting comments below:

Council fully supports this position and believes that a rights based approach should be taken. Everyone has the right to a stable environment they call home and where they feel safe. However, Council wishes to emphasise that given the complexity of additional needs, a greater focus is needed on providing dedicated support to vulnerable clients to sustain their tenancy long term.

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.

Yes

Please provide any supporting comments below:

Council supports models like Housing First and encourages their roll out by looking innovatively and flexibly at housing stock and working in partnership with the community, voluntary and private sector to meet the needs of this client group. Council would also wish to emphasise previous comments around ensuring the appropriate support is provided to vulnerable individuals to ensure they can maintain a tenancy long term.

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

Yes

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.

Yes

Please provide any supporting comments below:

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.

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

Yes

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:

Council would also highlight the need to provide training and awareness raising to front line staff from other statutory agencies on how they can best assist.

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.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

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

Yes

Please provide any supporting comments below:

Yes, however, Council would re-emphasise previous comments that accountability and assurance need to operate at all levels (strategic, operational and front line) given the high levels of vulnerability within this client group.

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:

Belfast City Council welcomes the opportunity to consider and respond to the public consultation on the Chronic Homelessness Action Plan issued by the Housing Executive in May 2019. People & Communities Committee on 6 August agreed the consultation response enclosed. The above response remains subject to ratification by Council on 02 September 2019 following which we can update our response with any changes and notify you of this.

Council agrees it has a pivotal role in highlighting the need for collaborative and co-ordinated action on homelessness in the city & welcomes the opportunity to respond to the chronic homelessness action plan.

In recent years there have been high levels of interest and concern from Elected Members around homelessness and associated vulnerabilities in Belfast and the region. Most recently in February 2019, following a Notice of Motion, Council agreed 'through the office of the Mayor, to convene a statutory and non-statutory multi-agency task group that will seek to take further partnership actions in addressing all facets of homelessness.'

This task group was to bring together the relevant statutory and voluntary service providers for those living with addiction and mental health issues and those who have no place to call home.

This reflects the sentiment in appendix A of the main consultation that declares chronic homelessness as “chronic as in health and homeless in terms of housing” and this dual purpose needs to be obvious in the final action plan to ensure the outcomes in the Belfast Agenda, namely ‘to leave no one behind’ are met for those experiencing chronic homelessness.

The first meeting of this task group took place on 17 May 2019 and was led by Lord Mayor Deirdre Hargey.

Health

The community plan provides opportunity to commission person centre and integrated support for people experiencing vulnerabilities. It also extends the opportunity to innovate and create new ways of providing the support needed via community and neighbourhood led support hubs and support networks.

Housing

As the lead authority on HMOs and licensing along with the planning vires, Council believes that a strategic and collegiate approach to developing future housing options is a real opportunity to adapt & commission new build proposals to reflect the specific needs of chronically homeless individual including single lets, tiered housing schemes and supported housing. As part of the consultation statistics on homelessness and levels of occupancy have been provided. However, it is unclear from information available whether the type of current and planned housing provision specifically meets the needs of the chronically homeless.

Partnership & collaboration

In response to need, Council has developed its community safety and health/wellbeing services to work more effectively in partnership with other statutory, community and voluntary services supporting those who may be chronically homeless and/or vulnerable. This role has grown and we seek to be a dynamic co-producer of this with our partners to ensure we ‘leave no one behind’. We think community planning provides the strategic umbrella to think differently & commission the required services and action to remove chronic homelessness in the city. In this situation we request that the task group that is being established is a window of opportunity to progress many of the objectives in this action plan.

Housing
Executive

