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Dear Mr Tanswell

**Re: Consultation on Draft Homelessness Strategy 2022-27: Ending Homelessness Together**

1. The Commission welcomes the opportunity to respond to the draft Homelessness Strategy 2022-2027 and whilst acknowledging the Housing Executive's duty to address homelessness, we welcome the proposed cross-departmental focus on homelessness prevention including programmes co-designed with those who have lived experiences of homelessness.
2. COVID-19 impacted many areas of life, including the need for adequate housing to support lockdown measures, for example sharing accommodation with family or friends. We thus welcome the development of action plans on a yearly basis to ensure implementation plans reflect any evolving challenges that may affect homelessness. We await the publication of the final strategy and a Year 1 action plan, and recommend the allocation of responsible department(s) and reporting officer(s) to associated outcomes<sup>1</sup>.
3. The Commission welcomes the seven principles and enablers; however, to achieve the objectives, appropriate funding and staffing responsibilities should be allocated to ensure success against the High Level Objectives. In addition, we recommend that any evidence base include disaggregated data across Section 75 grounds to allow meaningful equality analysis to ensure the effectiveness of specific actions taken addresses specific inequalities.
4. The final evaluation of the current Strategy<sup>2</sup> should provide a baseline to measure the development and success of the proposed High Level Objectives and any lessons learnt incorporated into annual action plans.

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<sup>1</sup> NI Housing Executive (2021) Ending Homelessness Together: Draft Homelessness Strategy 2022-27 Pgs 4/5

<sup>2</sup> NI Housing Executive (2017) Ending Homelessness Together: Homelessness Strategy 2017-2022

## Objective 1: Prioritise Homelessness Prevention

### *Primary Prevention Activity*

5. We welcome the consultation proposal to implement early intervention to prevent homelessness happening. We suggest inclusion of guidance on when early intervention should occur to assist in clarifying the types of services required in the provision of this service.
6. In addition, the Commission continues to recommend that the provision of support / advice services be tailored and takes account of the needs of people with particular equality-related characteristics.

### *Secondary Prevention Activity*

#### Young people

7. The number of young people aged 16 to 25 years presenting as homeless has remained consistent between (34%) in 2016/17 and (32%) in 2020/21<sup>3</sup>. Whilst the consultation acknowledges the impact COVID-19 has had on young people with the number of placements in the Belfast area quadrupling between 2019/20 to 2020/21<sup>4</sup>, consideration of wider issues such as training and employment opportunities and the particular impact on younger people should be considered in homelessness prevention.

#### Welfare Reform

8. Account should be taken on the long-term impacts of welfare reform as they relate to housing when implementing prevention activity. The Executive's mitigations package cushions the impact of Welfare Reform implementation; however, the Commission is concerned at the long-term implications of Welfare Reform on a number of equality groups. For example, there are particular issues for young people and people with disabilities.
9. The Commission continues to recommend addressing the needs of single tenants / prospective tenants aged 35 years old and under when renting in the private sector, as entitlement is to the lower shared accommodation rate of the housing element of Universal Credit.

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<sup>3</sup> NI Housing Executive (2021) Ending Homelessness Together: Draft Homelessness Strategy 2022-27 Appendix One – Homelessness Data. Table 2: Presenters by household. 2016/17, 34%; 2017/18, 33%; 2018/19, 31%; 2019/20, 31%; 2020/21, 32%.

<sup>4</sup> NI Housing Executive (2021) Ending Homelessness Together: Draft Homelessness Strategy 2022-27 Pg 10

## Objective 2: Address homelessness by providing secure, appropriate accommodation and support

The provision of support services provided within social housing to maintain tenancies may not be available to those living in the private rented sector. It is important that any necessary support to maintain tenancies is available and focuses on the specific needs of individuals from across the equality categories.

### Migrants and Minority ethnic groups

10. Research suggests there is potentially limited awareness of rights and/or limited accommodation choices available to migrants and minority ethnic groups. Furthermore, these groups may lack a wider network of family and friends with knowledge of the Northern Ireland housing market, which would enable them to make better-informed choices.
11. All associated information should be provided in methods and formats accessible to the identified audience both in terms of language and dissemination channels.

## Objective 3: Support customers exiting homelessness into settled accommodation

12. The Commission recommends ensuring the availability of suitable accommodation and services for homeless single males; younger and older people; and refugees and unsuccessful asylum seekers.
13. We note the multi-faceted nature of homelessness, including for those who are vulnerable and/or with complex needs<sup>5</sup>. In light of the prevalence of complex needs, the provision of support services is a crucial factor.

### Single males

14. Data within the draft Strategy reported single males accounted for 36% reference person households during the year 2020/21<sup>6</sup>. Due to the pressures on social housing, and a relative lack of one-bedroom properties in Northern Ireland, males, if accepted as homeless, are likely to be housed in temporary hostel accommodation on a longer-term basis, which may not be appropriate. We recommend action to ensure the provision of accommodation appropriate to the needs of this group, providing appropriate support as required.

### Refugees and unsuccessful asylum seekers

15. Particular issues arise for individuals from minority ethnic groups (MEG) who are resident in Northern Ireland as refugees and asylum seekers. While those who have been unsuccessful in their asylum application have no right to any

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<sup>5</sup> Agenda NI (2014) [Homelessness in Northern Ireland](#), April edition

<sup>6</sup> NI Housing Executive (2021) [Ending Homelessness Together: Draft Homelessness Strategy 2022-27](#) Appendix One – Homelessness Data. Table 2: Presenters by household.

accommodation support, refugees do have entitlement. We recommend the provision of appropriate culturally sensitive accommodation for those groups eligible for services. For those currently ineligible, we recommend the provision of suitable emergency accommodation.

## Enablers

16. The Commission continues to recommend the collection of comprehensive data to identify equality impacts and shape targeted actions to advance equality. Robust equality data in Northern Ireland enables good evidence-based policy making and can assist with effective compliance with the equality and good relations duties established by the Northern Ireland Act 1998.
  
17. Action plans for the High Level Objectives offer the potential to provide transparency on available data and two way engagement as action plans are designed, implemented and reviewed. All objectives should not only be tracked in aggregate but also for the impact on individuals from each of the Section 75 equality grounds.

Yours sincerely



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