

Ending Homelessness Together

Homelessness Strategy **2022-27**
Consultation Response Document



Ending Homelessness Together

Written Consultation Responses to the draft Homelessness Strategy 2022-27

The draft Homelessness Strategy 2022-27 was subject to a public consultation which commenced on 2nd November 2021 and closed on 25th January 2022. Over the course of this consultation the Housing Executive received a total of 30 written responses. In addition, the Housing Executive facilitated a number of online consultation events which included a presentation and workshops for consultees to express their opinions on the vision, aim, principles, objectives and enablers of the draft Homelessness Strategy 2022-27. These consultation events took place on the following dates:

- 29th November 2021
- 13th December 2021
- 12th January 2022

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

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 30 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 30 responses which provided a written response is included in the table which follows the quantitative overview)

There was significant support for the draft Homelessness Strategy 2022-27, as evidenced by the quantitative analysis, whereby the majority of questions delivered a 100% rate of agreement with further information noted below.

- 100% of consultees agreed with the vision of 'Ending Homelessness Together';

- 100% of consultees agreed with the aim of ‘Wherever possible homelessness should be prevented, if homelessness cannot be prevented it should be rare, brief and non-recurring’;
- 100% of consultees agreed with the principles that will guided the Strategy, both in their entirety and as per the individual principles below:
 - Person Centred
 - Evidence Based
 - Partnership Working
 - Expert Led
 - Responsive
 - Innovative
 - Delivering Value for Money
- 100% of consultees agree with Objective 1 - ‘Prioritise homelessness prevention’;
- 100% of consultees agree with the focus outlined in Objective 1 that will guide the Year 1 Action Plan. The draft Strategy outlines that actions identified in each year’s Annual Plan throughout the lifespan of the Strategy will focus on the following:
 - Primary Prevention Activity
 - Secondary Prevention Activity
 - Tertiary Prevention Activity
- 90% of consultees agree with Objective 2 - ‘Address homelessness by providing secure, appropriate accommodation and support’;
- 90% of consultees agree with the focus outlined in Objective 2 that will guide the Year 1 Action Plan. he draft Strategy outlines that actions identified in each year’s Annual Plan throughout the lifespan of the Strategy will focus on the following:
 - Understanding the needs of our customers
 - Improving Access & Inclusion
 - Flexible and responsive accommodation & support services at the point of need
 - Implementing ‘Homeless to Home’, Strategic Action Plan for Temporary Accommodation
- 100% of consultees agree with Objective 3 - “Support customers exiting homelessness into settled accommodation’;
- 100% of consultees agree with the focus outlined in Objective 3 that will guide the Year 1 Action Plan. The draft Strategy outlines that actions identified in each year’s Annual Plan throughout the lifespan of the Strategy will focus on the following:
 - Housing Supply
 - Support
 - Community Integration
- 100% of consultees agreed with the enablers that are outlined in the Strategy, both in their entirety and as per the individual enablers below:
 - Experiential Evidence
 - Collaboration
 - Legislation
 - Interdepartmental Approach
 - Funding
 - Staff

- Process

Given the almost unanimous support noted above there have been no major amendments following the consultation. In addition to the quantitative response noted above the remainder of this document noted key comments from individual consultation responses with comments categorised as follows:

- Agreed – this is generally where a comment is supporting a view already expressed in the Homelessness Strategy 2022-27:
- Accepted – this is generally where a comment suggesting an amendment has been accepted with a subsequent explanation noting how the Housing Executive will address the acceptance of this comment;
- Not accepted – this is generally where a comment suggesting an amendment has not been accepted with a subsequent explanation noting why such a comment has not been accepted;
- Noted – this is generally where a comment has been noted with a subsequent response from the Housing Executive noting a response which, for example, may refer to the comment being forwarded on to another Department who will have responsibility for addressing the comment due to the remit not being the duty of the Housing Executive. Additionally, a comment may be noted where, while it has not resulted in a direct amendment to the Homelessness Strategy 2022-27, the general comment will be considered as the Housing Executive implements the Strategy over the next five years.

It should be noted that a number of responses provided specific comments on issues such as funding, or issues which were beyond the remit of the Housing Executive such as the provision of accommodation for those with No Recourse to Public Funds. A general overview of these issues is listed below:

- Funding – The Housing Executive acknowledges the significant funding challenges that exist in delivering the Homelessness Strategy 2022-27. While the Housing Executive recognises such funding challenges we remain committed to delivering the ambitions as outlined in the draft Homelessness Strategy 2022-27. Our Year 1 Action Plan recognises a number of risk factors in delivering a number of actions, particularly in relation to funding.
- No Recourse – A number of consultees have made comments in relation to individuals with No Recourse to Public Funds. The Housing Executive would note that the provision of assistance beyond the current Memorandum of Understanding would require legislative amendments and this is beyond the remit of the Housing Executive. The Year 1 Action Plan does contain a commitment to explore methods, opportunities and options by which we can assist those with No Recourse to Public Funds upon the conclusion of arrangements linked to the Memorandum of Understanding
- Housing Supply – As of February 2022, the draft Housing Supply Strategy, is subject to public consultation and while the Department for Communities and Housing Executive are committed to alignment of both strategies, the Housing Executive will submit a summary of responses relevant to housing supply received as part of this strategy.
- Improved data analysis – The Housing Executive is committed to improving our analysis of homelessness data, particularly in regards to emerging client groups, in order to improve our development and delivery of services.

- Legislation – The consultation response below outlines a number of comments in relation to legislative amendments, particularly in relation to a statutory duty on collaboration in respect of homelessness. While legislative amendments are beyond the remit of the Housing Executive the Year 1 Action Plan contains a commitment to liaise with the Department for Communities in identifying any legislative amendments which are required.
- Supporting People Strategy/Funding - Housing Supply – As of February 2022, the draft Supporting People Strategy, is subject to public consultation and while the Housing Executive is committed to alignment of both strategies, Supporting People will be provided with a summary of responses relevant to the Supporting People Strategy/funding considerations received as part of this strategy.
- Annual Action Plans – The Housing Executive has published a Year 1 Action Plan and while this consultation was considered in the development of this Action Plan a number of comments in relation to actions will be considered for actions in subsequent years. The Year 1 Action Plan notes enablers have been identified as being critical to the success of the strategy a significant focus in the coming year (2022/23) is on delivering actions that will enable us to achieve our objectives.

The table overleaf provides further details on the percentage agreement rates for each of the questions asked as part of the consultation process.

Consultation Questions		Response (%)
1	Do you agree with the vision of 'Ending Homelessness Together?'	100%
2	Do you agree with the aim of 'Wherever possible homelessness should be prevented, if homelessness cannot be prevented it should be rare, brief and non-recurring?'	100%
3	Do you agree with the principles that will guide the delivery of the Strategy?	100%
A	Person Centred	100%
B	Evidence Based	100%
C	Partnership Working	100%
D	Expert Led	100%
E	Responsive	100%
F	Innovative	100%
G	Delivering Value for Money	100%
4	Do you agree with the focus of Objective 1 - 'Prioritise homelessness prevention?'	100%
5	Do you agree with the focus outlined in Objective 1 that will guide the Year 1 Action Plan? The draft Strategy outlines that actions identified in each year's Annual Plan throughout the lifespan of the Strategy will focus on the following: <ul style="list-style-type: none"> • Primary Prevention Activity • Secondary Prevention Activity • Tertiary Prevention Activity 	100%
6	Do you agree with Objective 2 - 'Address homelessness by providing secure, appropriate accommodation and support?'	90%
7	Do you agree with the focus outlined in Objective 2 that will guide the Year 1 Action Plan? The draft Strategy outlines that actions identified in each year's Annual Plan throughout the lifespan of the Strategy will focus on the following: <ul style="list-style-type: none"> • Understanding the needs of our customers • Improving Access & Inclusion • Flexible and responsive accommodation & support services at the point of need • Implementing 'Homeless to Home', Strategic Action Plan for Temporary Accommodation 	90%
8	Do you agree with Objective 3 - 'Support customers exiting homelessness into settled accommodation?'	100%
9	Do you agree with the focus outlined in Objective 3 that will guide the Year 1 Action Plan? The draft Strategy outlines that actions identified in each year's Annual Plan throughout the lifespan of the Strategy will focus on the following: <ul style="list-style-type: none"> • Housing Supply • Support • Community Integration 	100%
10	Do you agree with the enablers that are outlined in the draft Strategy?	100%
A	Experiential Evidence	100%
B	Collaboration	100%
C	Legislation	100%
D	Interdepartmental Approach	100%
E	Funding	100%
F	Staff	100%
G	Process	100%

The table below provides an overview of key comments from consultees with a summary response provided on behalf of the Housing Executive.

Consultee	Consultee Response	Housing Executive Response
Action for Children	<p>Yes/No responses supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>It is our view that this aim is well stated and an appropriate summary of the key concerns this draft Strategy should target. We strongly encourage policy frameworks that emphasise prevention and forward thinking; which this draft rightly emphasises as its priority. Finding the capacity to crisis-manage well (in the current context) and also try to upstream future pressures relating to housing and homelessness must be carefully managed going forward.</p> <p>On partnership working - we think this is crucial and that further attention will be needed on how this will be achieved. Capacity of organisations and partners are often chronically over-stretched and under-staffed in terms of being able to offer participative/co-productive feedback mechanisms that are important for the full delivery/accountability of strategies such as this one. Careful thought and planning into their full inclusion is needed (including adequate notice of engagements and a sense of deliverable outcomes associated with said engagement). Expert- led: For us- “Experts” are understood to automatically include those who have lived experience of homelessness or “those who have lived homelessness” as</p>	<p>Noted – The Housing Executive welcomes support of the aim of the Homelessness Strategy 2022-27.</p> <p>Agreed – The Housing Executive recognises the vital role of partnership working in the delivery our statutory duties around homelessness, including in the delivery of the Homelessness Strategy 2022-27. The Housing Executive notes the challenges cited in this particular response and the consideration of challenges such as those noted by Action for Children were factors in the Homelessness Strategy 2022-27 stating the need for enablers and associated actions.</p>

	<p>well as those delivering services (in both statutory and non-statutory settings).</p> <p>We agree with others in the Policy Forum hosted by Homeless Connect that this focus could be worded in line with the objective set out on p25: “Prevent homelessness from happening in the first place” which in our view is a more accurate reflection of what we want to achieve. The strategy rightly notes that N.I is still “focussed largely on responding to people who find themselves in crisis situations” before outlining that the ambition of the Housing Executive is “to prioritise homelessness prevention through the provision of the right support at the right time with an aim to prevent homelessness from happening in the first place.” We welcome this ambition and feel that work in the children and youth sector must be clearly incorporated into this focus from the start.</p> <p>We would like to see a specific pillar within this piece of the strategy around youth homelessness prevention. In particular, we would strongly recommend specific attention into prevention of youth homelessness for care-leavers and others in transition from custody or health-care/public residential, and amongst the one in four children in Northern Ireland who experience poverty.</p> <p>Regarding Primary Prevention Activity..... We broadly agree with this in principle, however we would point out the general lack of regional focus targeting vulnerable groups as</p>	<p>Not accepted – Given the overall percentages noted in the quantitative analysis outlined earlier in this document Objective 1 will remain as ‘Prioritise Homelessness Prevention. While the Housing Executive acknowledges this comment the rationale behind ‘Prioritise Homelessness Prevention’ is reflective of our intention as an organisation to prioritise homelessness prevention. While this prioritisation will not be at the expense of the other two objectives it does reflect the Housing Executive’s acknowledgement of the importance of homelessness prevention and our commitment to supporting homelessness prevention.</p> <p>Noted – The Homelessness Strategy 2022-27 acknowledges the importance of identifying ‘at risk’ groups with the Housing Executive committed ‘to take a more proactive approach to homelessness prevention including through funding, addressing service gaps, particularly for at risk groups, preventing new cases of homelessness as a result of the impacts of COVID-19, and preventing repeat homelessness.’</p> <p>Noted – please refer to comment above and the Housing Executive’s intention to support at risk groups.</p>
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	<p>part of wider service delivery in the 16-25 cohort. One of our services reported for example, their failed attempts to engage with Social Work teams to send referrals to our service for young people in care homes to provide preventative-minded support to prepare them for independent living prior to them turning 18. Her reflection was that “This work would be upskilling them in the knowledge of having their own tenancy and managing their home and currently the (social work) teams don’t see this as a priority”.</p> <p>It is clear that cross-departmental focus is essential to the preventative piece of this strategy, and we would argue there needs to ongoing outreach to different “sectors” in both statutory and non-statutory spaces to effectively implement the primary prevention actions. A mapping exercise of who is already involved and who is not would be a useful exercise within the year 1 Action Plan – to identify clearly which stakeholders are currently not fully engaged in this aspect of the vision of this Strategy and should be. We would argue that the children, youth, health/social care and education sectors need to be fully included within the Primary Prevention Activity for it to be more successful.</p> <p>We would support others in the Policy Forum NI in their position that there is potential confusion caused by this document and the Strategic Action Plan for Temporary Accommodation (SAPTA) both set out prevention as one of their key objectives. It is our view that the need for</p>	<p>Noted – While the Housing Executive acknowledges and agrees that the children, youth, health/social care and education sectors need to be fully included within the Primary Prevention Activity, we would also note that the suggestion for mapping exercise of who is already involved and who is not would be a useful exercise will be considered for future annual action plans and not the Year 1 Action Plan as suggested.</p> <p>Not Accepted – The Housing Executive would note our view that the draft Homelessness Strategy 2022-27 and Strategic Action Plan for Temporary Accommodation are intrinsically linked. As projecting needs is also a key commitment of the Strategic Action Plan for Temporary Accommodation the Housing Executive feels</p>
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	<p>Temporary Accommodation must be adequately responded to based on the needs as they currently are, and the prevention piece belongs more clearly within the Homelessness Strategy.</p> <p>Relating to the ambition to “Improve housing options to help people stay in their homes or find suitable accommodation before any homeless crisis.” – more clarity on what this means would be helpful. In particular, we operate in rural settings where housing options in both private rental and social housing are out of reach for many young people, either because of costings or location. We would recommend a particular statement around what constitutes “suitable” where the current dominant policy is such that it is deemed appropriate to move young people or other vulnerable people away from their community and support networks as a response to housing need.</p> <p>Action for Children’s priorities include that every child and young person should have access to a safe and stable home and the chance to thrive. Secure, appropriate temporary accommodation combined with holistic support is an essential part of achieving those aims. It is our view that this objective would be more clearly understood if it referenced the Housing Executive’s responsibility to provide secure, appropriate, temporary accommodation linked specifically to the Strategic Action Plan for Temporary Accommodation.</p>	<p>that prevention is relevant to both documents due to the role prevention activities will have in reducing demand for temporary accommodation.</p> <p>Noted – The Housing Executive would note that comments in relation to housing supply will be considered in context of alignment with the Housing Supply Strategy. In relation to the comment on the ‘current dominant policy is such that it is deemed appropriate to move young people or other vulnerable people away from their community and support networks as a response to housing need’ the Housing Executive will follow up with Action for Children for further information on the context of this comment.</p> <p>Noted – The Housing Executive would note that the draft Homelessness Strategy 2022-27 refers to the Strategic Action Plan for Temporary Accommodation throughout the document and Objective 2 includes several references in recognition of the intrinsic links between the two documents.</p>
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	<p>While we strongly support the recognition of the need to have a range of accommodation and support options, and would urge for a specific focus to understand the needs and the range of accommodation options needed to adequately support the 16-25 cohort. Youth homelessness support is almost always tied to needs in other areas including health, social, educational and employment support. Currently the over reliance on non-standard accommodation is completely unacceptable and this approach undermines any hopes of creating safe and stable placements where a young person can thrive.</p> <p>Floating Support teams are designed to assist in this process (of supporting young people into settled accommodation/ “exiting homelessness”)..... Working to increase floating support teams in terms of their capacity, reach, and influence within other sectors would in our view help deliver this objective.</p> <p>Floating support services are also crucial aspects of helping new tenancies become sustainable and adequate investment in their reach and building connections to the other agencies involved in a young person’s experience is another aspect of improving outcomes for citizens settling into accommodation. Rural areas in particular need specific investment to be able to recruit and sustain both floating support services and temporary accommodation offerings.</p>	<p>Noted – The Housing Executive acknowledges the increased use of non-standard, particularly in the context of the significant additional demand for temporary accommodation caused by the pandemic, as referenced in both the draft Homelessness Strategy 2022-27 and draft Strategic Action Plan for Temporary Accommodation. While both documents acknowledge this increase it is also intended to reduce the number of placements as we deliver both the Strategy and Action Plan over the coming years.</p> <p>Noted – As Floating Support is funded by Supporting People this comment will be referred for consideration by Supporting People.</p> <p>Noted – As Floating Support is funded by Supporting People this comment will be referred for consideration by Supporting People.</p>
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	<p>We would like to acknowledge the effort made by the Housing Executive in the pre-consultation they engaged in on this draft strategy. It is clear that the Housing Executive has in many ways listened to different stakeholders and it sets a good trajectory for ongoing partnership-working. We hope there remains an ongoing openness to feedback and exploring together new ways to develop and deliver better options and outcomes.</p> <p>We appreciate the acknowledgement that there is already and will be an increased demand on the system from households or individuals seeking asylum in Northern Ireland. Action for Children seek to be part of a compassionate and welcoming society, and believe more needs to be done pre-emptively to be able to respond to this need and equip more services to cater specifically for those arriving often in extremely traumatic circumstances. Currently, our own experience is that referrals to temporary accommodation are increasingly made purely on where there is space for an unaccompanied minor and not based on where would be best placed to meet their other social, health and educational needs. When we look objectively to the growing numbers of pressures on housing provisions for under 18s, it is our view that greater attention is needed to creating more space, in more places and with clear connection to the specificity of needs presenting.</p>	<p>Noted – The Housing Executive appreciates this comment and is committed to working with stakeholders such as Action for Children. The Housing Executive is committed to ‘an ongoing openness to feedback and exploring together new ways to develop and deliver better options and outcomes’ as suggested by Action for Children.</p> <p>Noted – The Housing Executive acknowledges this comment and in particular, would note the Strategic Action Plan for Temporary Accommodation, as a means of addressing the challenges that exist in regards to difficulties caused by placements in temporary accommodation. The response notes that ‘greater attention is needed to creating more space, in more places and with clear connection to the specificity of needs presenting’ and the Housing Executive would note the section on projected needs in the draft Strategic Action Plan for Temporary Accommodation which recognises the need to analyse data and trend information in relation to customer needs.</p>
Belfast Central Mission	Yes/No responses supportive of vision, aim, principles, objectives, actions and enablers.	

	<p>This new strategy builds on all that was good in the previous strategy and together we believe that we can ensure that homelessness is something we can prevent in the majority of service users we work with.</p> <p>We need to have more social housing available to allow young people to move on from Supported Housing, private rented is an option but is unaffordable for many and whilst we have reduced some barriers through our rent sorted scheme, the vast majority of landlords do not want to offer housing to young people. The Rural housing strategy and strategy for temporary accommodation in addition to localised responses to need are all vital.</p> <p>Our service users have lived experience of homelessness and the strategy reflects the need to be “expert led”, that means listening to service users, front line workers and all agencies working to eradicate homelessness.</p> <p>The main centre for homelessness within NIHE is Belfast, staff in local offices need training in understanding the needs of their customers, and we can support this by offering insight into our customers’ needs and as appropriate help to train all NIHE staff in being trauma informed.</p>	<p>Agreed – The Housing Executive welcomes this comment in the context of commitments to collaboration within the Homelessness Strategy 2022-27.</p> <p>Noted – The Housing Executive will consider this comment in the context of alignment with external strategies such as the Housing Supply Strategy and internal action plans such as the Strategic Action Plan for Temporary Accommodation. It should be noted that while the Housing Executive will seek to address this comment it will be within the scope we as an organisation in respect of deliver of our own strategies and collaboration with other organisations/departments.</p> <p>Agreed – The Housing Executive, as per the draft Homelessness Strategy 2022-27, agrees that expert led will mean we listen to the views of service users and front line workers in the development and delivery of homelessness services.</p> <p>Noted – Staff across all Housing Executive offices receive the same level of training, regardless of location. This training ensures that staff encourage clients to engage with support organisations and the Housing Executive is keen to work with BCM, particularly through any Local Area Groups which BCM sit on, in any support or collaboration that can be provided.</p>
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	<p>For those who are living in the community or moving into the community the need to continue provision of homeless starter packs, to help with discretionary support to furnish the home, to provide regular tenant check in's during those first 12 months to ensure that rent is being paid and to pick up on problems with affordability, poverty at the earliest opportunity and not let it go on to the stage of eviction. The absence of investing in wrap around support potentially leads back into recurring homelessness.</p> <p>Housing Supply is the biggest priority as Supported Housing Services are developing young people's skills for maintaining accommodation etc. and this can be lost very quickly as the only move on accommodation is a hostel.</p> <p>Link with the KPI's for Supporting People funded services. Continue to provide local breakdown of statistics at Homeless LAGS. Ask services to provide figures on the number of cases they work with, outcomes around tenancy sustainment, type of housing tenure.</p>	<p>Agreed – The Housing Executive has considered these issues in the draft Homelessness Strategy 2022-27. These are issues which were considered in the development of this objective and the development of Annual Action Plans will seek to deliver actions that will address these challenges over the course of the Strategy.</p> <p>Noted – this issue will be considered as the Housing Executive works with the Department for Communities on the alignment of the Homelessness Strategy 2022-27 and the Housing Supply Strategy.</p> <p>Noted – Issues such as these were considered in the development of the Strategy and while data as such as KPIs were not directly referenced the draft Homelessness Strategy 2022-27 refers to the use of data in several sections, but particularly in Objective 1 and the Experiential Evidence section of the Enablers.</p>
Belfast City Council	<p>Yes/No responses generally supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>In terms of A and C – it is also important to consider when/where families of customers are engaged with (where appropriate) both in terms of prevention (trying to prevent or intervene early where relationship breakdowns lead to homelessness) as well as in terms of supporting individuals</p>	<p>Agreed – The Housing Executive notes this comment in context of enablers and the Homelessness Strategy 2022-27 will seek to address this point in the delivery of our objectives and actions.</p>

	<p>to secure and maintain tenancies i.e. assessing the ability of the family to act as positive or stabilising influence and in providing ongoing support and to be able to link in with/work alongside support services.</p> <p>Need to take into consideration the needs of people that have No Recourse to Public Funds and do not have the wider support mechanisms that other categories of people might have i.e. through friends and family that they can draw on. People with no recourse to public funds are very often prohibited from accessing homeless shelters that rely on public funds. Consideration should be given to the impact of the ‘Everyone in’ policy that existed during the Covid-19 pandemic, which provided accommodation to homeless people that had no recourse to public funds.</p> <p>Work needs to be undertaken within communities regarding integration and how challenges around inclusion can be addressed.</p> <p>We are proud to be a partner in taking forward the Complex Lives approach and are hopeful that its implementation, alongside Housing First, will make a difference to, and ultimately see a dramatic reduction in, those impacted by chronic homelessness.</p>	<p>Noted - Destitution of refugees and asylum seekers is an issue 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 Homelessness Strategy 2022-22.</p> <p>Agreed – The Housing Executive notes this comment and would refer to our actions within Objective 3, specifically those relevant to community integration.</p> <p>Noted – The Housing Executive is also proud be a partner in taking forward the Complex Lives approach and looks forward to continued collaboration with Belfast City Council and other partners in the delivery of this project.</p>
Causeway & Mid Ulster Women’s Aid	Yes/No responses generally supportive of vision, aim, principles, objectives, actions and enablers.	

	<p>To make homelessness a thing of the past the aspiration must be to end it. This cannot be achieved by any one agency so building stronger and more productive partnerships will be key to delivering on this vision. Improved links to Supporting People funded services to ensure their maximisation and integration into the out-workings of actions arising from the strategy will be key to its success.</p> <p>The route to homelessness or threat of homelessness for women who are victims of domestic violence is very different from other service users. Supporting programmes for the education of children and young people about domestic violence is a valid route for the future prevention of homelessness. Therefore, as NIHE move forward in actions to promote prevention a recognition that domestic violence causes homelessness must be understood and built in.</p> <p>Responding to the most common reasons that lead to people presenting as homeless is essential to prioritisation of future actions for NIHE however, reliance on NIHE data on presenters does not lead to a full understanding of the routes to homelessness for all service users. For women who are threatened with homelessness because of domestic violence and access floating support the majority are referred into our services through PSNI, Social Services and self-referrals. In the implementation of this strategy, it</p>	<p>Agreed – The Homelessness Strategy 2022-27 acknowledges the importance of collaboration as reflected in the vision of ‘Ending Homelessness Together’. Further to the above point on collaboration the Housing Executive acknowledges the key role that Supporting People funded services will have in delivering the Homelessness Strategy 2022-27.</p> <p>Agreed – The Homelessness Strategy 2022-27 acknowledges and agrees with this point and we will work with our partners to identify groups considered ‘at risk’ but are now particularly so due to the economic and social consequences of the pandemic. Evidence of working with partners to identify at risk groups is evidenced in the implementation of our COVID-19 Reset Plan and the Housing Executive acknowledges the need to recognise that domestic violence causes homelessness.</p> <p>Noted – The Housing Executive recognises the importance of collaboration in gathering data from a range of stakeholders. The Homelessness Strategy 2022-27 recognises this importance in our collaboration enabler which notes an intention to ‘We will share information with relevant stakeholders within data protection safeguards’.</p>
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	<p>is therefore vital that NIHE access all necessary external data to give a true reflection of need.</p> <p>Housing supply and increasing housing options must be addressed, however, the importance of nature of tenure must not be lost within this process. To ensure sustainable tenancies any increased use of the private rental sector without regulation may very well result in revolving door homelessness.</p> <p>The processes used to develop this strategy have been productive as they have recognised the need for collaboration and partnership working. To develop and deliver on this strategy then the expert knowledge of specialist services such as those delivered by Women’s Aid will be required. Women’s Aid involvement will assist the NIHE to deliver on the underpinning principles detailed within the strategy and would welcome all opportunities to work alongside the NIHE.</p>	<p>Noted - As noted earlier in this document the issue of housing supply (including regulation of the private rented sector) will be brought to the Department for Communities for consideration, particularly in context of alignment with the Housing Supply Strategy.</p> <p>Noted – The Housing Executive acknowledges this comment and would note appreciation to Causeway and Mid Ulster Women’s Aid for the support and cooperation in developing the draft Homelessness Strategy 2022-27. The Housing Executive is keen to build on this collaborative working with all organisations within the overall Women’s Aid structures.</p>
Chartered Institute of Housing	<p>Yes/No responses supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>CIH agrees with the vision of ‘Ending Homelessness Together’. We welcome that the vision encompasses the need for inter-agency and inter-departmental co-operation. We also recognise how important the incorporation of lived</p>	<p>Agreed - The draft Homelessness Strategy 2022-27 acknowledges the importance of cross-departmental working which is demonstrated in the vision of ‘Ending Homelessness Together’. Furthermore, the Housing Executive acknowledges the importance of engagement of those with lived experience in the</p>

	<p>experience will be to helping shape the strategy over the next five years.</p> <p>Although the Housing First model is already used in Northern Ireland, we believe its expansion would help decrease the reoccurrence of homelessness, especially among those client groups with complex needs.</p> <p>Under the principle ‘responsive’ we feel that it is important that the strategy be flexible and adapt to feedback from the sector and clients where possible.</p> <p>To ensure prevention remains a priority, proficient funding with housing as a key outcome in the programme for government is vital. We would also like to add that securing long term funding for Supporting People is imperative to fulfilling this objective. Any future real term cuts to the Supporting People budget would make homeless prevention a much more difficult task for service providers than it already is.</p> <p>We believe that an additional tenancy selection scheme rule that supports pre-tenancy engagement through identifying specific tenant needs and offering appropriate support services to meet those needs will bolster tenancy sustainment by avoiding the placement of clients in a tenancy not appropriate to their needs.</p>	<p>development and delivery of homelessness services, including the Homelessness Strategy.</p> <p>Agreed – the proposed expansion of Housing First is seen within the draft Homelessness Strategy 2022-27 as a key mechanism by which the Housing Executive and our partners can address repeat homelessness.</p> <p>Agreed – The draft Homelessness Strategy 2022-27 acknowledges this comment with the intention to develop annual action plans. Actions plans will reflect on feedback and the changes in the broader external factors.</p> <p>Noted – The Housing Executive has provided a general comment in response to all comments on funding in the introduction of this document. As this comment refers directly to Supporting People funding this will be passed to colleagues in SP for consideration in the context of the draft Supporting People Strategy.</p> <p>Noted – The Housing Executive will follow up with the Chartered Institute of Housing for further information on this comment. It should be noted that addressing this comment lies beyond the remit of the Homelessness Strategy 2022-27 and discussions with the Chartered Institute of Housing will be explored in context of Tenancy Sustainment Strategy.</p>
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	<p>Since the beginning of the coronavirus pandemic, many households who previously have not been affected by homelessness or have never before been at risk of falling into homelessness, are now being faced with that situation for the first time. The strategy should therefore aim to identify groups of households not previously considered ‘at risk’ but are now so due to the economic and social consequences of the pandemic.</p> <p>We feel that access and inclusion is important in the context of rural communities where services may be less restricted.</p> <p>CIH also believes that the development of mixed-tenure communities, and the placement of tenants into those communities, is beneficial to tenancy sustainment given the diversity of those neighbourhoods and the value they can add to the lives of individuals.</p>	<p>Agreed – The Homelessness Strategy 2022-27 acknowledges and agrees with this point and we will work with our partners to identify groups not previously considered ‘at risk’ but are now so due to the economic and social consequences of the pandemic. Evidence of working with partners to identify at risk groups is evidenced in the implementation of our COVID-19 Reset Plan.</p> <p>Accepted – The Housing Executive acknowledges this point and will work with our Rural & Regeneration Unit in order to address this point going in the implementation of this action.</p> <p>Noted –The Housing Executive will engage with relevant stakeholders, particularly the Department for Communities in implementing the Housing Supply Strategy, in addressing this comment in the context of delivering actions within objective 3 (e.g. actions relevant to Housing Supply and Community Integration).</p>
Choice Housing	<p>Yes/No responses generally supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>The vision delivers a message of positivity and rightly highlights the need for collaborative working beyond the Social Housing Providers as we know that no one entity can end homelessness. The input of the Health & Social Care sector will be crucial in bringing together this Strategy, particularly for jointly commissioned services. We would</p>	<p>Noted – As per the Homelessness Strategy 2017-22 the Homelessness Strategy 2022-27 will be supported by an Inter-departmental Homelessness Action Plan which will be developed by the Department for Communities and involve actions on behalf of other departments, including Health.</p>

	<p>welcome more details as to how various Departments /partners are accountable for contributing to ending homelessness as set out in the Strategy.</p> <p>More detail would be welcome regarding how those vulnerable to homelessness are identified and engaged with in a way that enables preventative work to be done. Front line staff are critical to this and a focus on staff training across frontline contact points would support this key work. However, with all the necessary tools it will not always be possible to prevent homelessness and whilst we agree that where homelessness occurs it should be brief and non-recurrent this in itself would be resource intensive and assumes that appropriate accommodation will be available. It is not clear in the Strategy how this will be achieved as additional funding is yet to be sourced.</p> <p>Choice understands the rationale for the Action Plan to be one year at a time however this may present challenges. One year is a tight time line within which to review progress against targets particularly in an area as complex as homelessness and homelessness services. Consideration for a 2 Year Action may allow for adequate reflection, assessment, and forward planning to the next year. Planning for one year at a time may also limit any differentiation or pressures created by delays in delivering the objectives of each year and provide a greater degree of flexibility when considering the changing environment.</p>	<p>Noted – The Housing Executive acknowledges this point and the enablers Homelessness Strategy 2022-27 notes ‘It is our intention to work towards the defined success criteria outlined in this document by developing the ‘enablers’ and pulling all levers available to us. These enablers are as critical to the success of the strategy as the delivery of the objectives themselves. Relevant actions will be included in the Annual Action Plans to reflect key actions associated with the enablers’. The Housing Executive recognises the importance of front line staff and has included staff as an enabler with actions to be outlined in annual action plans.</p> <p>Noted – The Housing Executive acknowledges the comments in respect of a suggested 2 year action plan and would note that should there be delays in the delivery of actions it is our intention that they would be brought forward to the subsequent action plan.</p>
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	<p>Whilst numerical data will likely provide the basis for monitoring of homeless, feedback from services within the sector would be useful at the end of each year.</p>	<p>Noted – The Housing Executive is keen to engage with providers across the sector and will look at methods by which we can engage with the sector to gather feedback on our provision of data.</p>
<p>Department of Justice</p>	<p>This response was one of a number which were not submitted on the consultation template provided and therefore no answers to the yes/no questions were received.</p> <p>The commitment to work collaboratively to achieve the objectives is acknowledged. The Department contributes to the Interdepartmental Homelessness Action Plan (IDHAP) and is represented on the current Homelessness Strategy Steering Group (HSSG) and will continue to address homelessness through this work. The Department is also happy to explore collaborative working outside the remit of the IDHAP or HSSG, for instance through already established partnerships forged through the Supporting People structures.</p> <p>The importance of a co-design approach with those who have a lived experience is welcomed. It is noted this has been part of the development of the strategy to date and the Department welcomes the commitment made to ensuring insights shape the delivery of the strategy. The Department is keen to learn more about the Homelessness Lived Experience programme, which is to align to the strategy.</p>	<p>Noted - The Housing Executive acknowledges the importance of the Department of Justice as a partner in addressing homelessness and is keen to continue in our collaborative efforts over the course of the Homelessness Strategy 2022-27.</p> <p>Noted – The Housing Executive will provide further detail on the implementation of our Lived Experience Programme in our annual action plans and annual progress reports.</p>

	<p>The Department believes that the commitment to focus on particular high-risk groups could produce positive outcomes. The need for stable and supported accommodation is paramount to the lives of high-risk groups. In particular, the Department has an interest in representing the needs of:</p> <ol style="list-style-type: none"> 1. Survivors of domestic abuse; <ul style="list-style-type: none"> • Safe and supported accommodation is often needed at very short notice for those leaving domestic abuse situations. The risk of homelessness can prevent someone leaving an abusive situation, particularly if they have children. 2. Adults with convictions; <ul style="list-style-type: none"> • It is known that for those on the cusp of offending and those who have offended, stable and supported accommodation can be a stabilising factor in their journey away from offending. • It is widely known there is a gap in stable and supported bespoke accommodation for women. Women often report feeling unsafe when allocated temporary accommodation in a mixed sex hostel. For some women who have experienced past 	<p>Noted – The Homelessness Strategy 2022-27 acknowledges the importance of identifying ‘at risk’ groups with the Housing Executive committed ‘to take a more proactive approach to homelessness prevention including through funding, addressing service gaps, particularly for at risk groups, preventing new cases of homelessness as a result of the impacts of COVID-19, and preventing repeat homelessness.’</p> <p>Noted – The Housing Executive refers to the general comment above in respect of identifying ‘at risk’ groups and will work with partner agencies such as the Department of Justice in addressing any relevant issues over the course of the Homelessness Strategy 2022-27.</p> <p>Noted – The Housing Executive refers to the general comment above in respect of identifying ‘at risk’ groups and will work with partner agencies such as the Department of Justice in addressing any relevant issues over the course of the Homelessness Strategy 2022-27.</p>
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	<p>trauma in their lives, they have reported that they would rather commit another offence to return to prison than be housed in certain temporary accommodation.</p> <p>3. Children (16-18 year olds) in contact with Youth Justice Services.</p> <ul style="list-style-type: none"> • Having a stable and safe place to live is an important factor in preventing children from re-offending and the Youth Justice Agency welcomes the work of partners to help improve existing provision. <p>The intention to develop an annual action plan to implement the strategy is noted. The document states that the Housing Executive will consult the partners who sit on the Local Area Groups and the Central Homelessness Forum on the development of the annual action plans. As the Department is not represented on these groups, it would like to discuss ways in which its views can be considered in the development of the plans.</p>	<p>Noted – The Housing Executive refers to the general comment above in respect of identifying ‘at risk’ groups and will work with partner agencies such as the Department of Justice in addressing any relevant issues over the course of the Homelessness Strategy 2022-27.</p> <p>Noted – The Housing Executive is happy to meet with the Department of Justice outside of the consultation process in order to discuss how the Department can be represented on the various implementation groups.</p>
Depaul	<p>Yes/No responses supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>To achieve Ending Homelessness, the delivery of the objectives within the Homeless strategy is so interconnected and reliant on other Government</p>	<p>Noted - The Housing Executive acknowledges the importance of cross-departmental working which is demonstrated in the vision of ‘Ending Homelessness Together’.</p>

	<p>department strategies. Without all other departments commitment and delivery of their strategies the NIHE cannot fully deliver the objectives and realise their goals as outline in the 'Ending Homelessness Together'</p> <p>Depaul agree with the need to look at funding; we would recommend a multi annual funding approach to ensure stability of service provision and also allow for planning. Funding also needs to be considered in relation to inflationary impacts on staffing and service delivery so that recruitment and service delivery can continue. This is particularly pertinent to prevention services which will be predominantly reliant on SP funding with no housing benefit monies available. With this in mind a full cost recovery model should be at the fore of the service commissioning.</p> <p>There is a need for multi department funding i.e. Health Trusts, PHA, SP, NIHE and Justice due to the changing nature of the service user cohort which means wider interagency and inter department collaboration is required to provide successful care plans for service users who are now more complex. There is a need for varied expertise as well as the necessary funding required.</p> <p>Cross departmental commitment written into legislation that link statutory & voluntary sector so a mulita agency approach can be materialised</p>	<p>Noted – The Housing Executive has provided a general comment in response to all comments on funding in the introduction of this document.</p> <p>Noted – The Housing Executive has provided a general comment in response to all comments on funding in the introduction of this document.</p> <p>Noted – This comment is beyond the remit of the Housing Executive but will be raised with the Department for Communities.</p>
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	<p>We would agree that annual action plans and quarterly reports will be good methods by which to report and monitor progress; however, measurement of progress via a traffic light system may not fully reflect the actual progress made. This can give a false impression of what has been achieved. A numerical scoring system EG 1- 5 Not commenced/ commenced with some progress; 5- 10 medium progress with some objectives met; 10- 15 Well progressed/ ahead of target; 15- 20 On target or completed. A method of monitoring the progress on the interdependency in other Government department strategies and a means by which to consult, report and discuss progress and priorities would be beneficial.</p>	<p>Not accepted – In context of the range of responses on the monitoring and reporting of the draft Homelessness Strategy 2022-27 the Housing Executive feels that proposed arrangements are adequate.</p>
<p>Equality Commission for Northern Ireland</p>	<p>This response was one of a number which were not submitted on the consultation template provided and therefore no answers to the yes/no questions were received.</p> <p>We welcome the proposed cross-departmental focus on homelessness prevention including programmes co-designed with those who have lived experiences of homelessness.</p>	<p>Noted – The Housing Executive acknowledges the importance of cross-departmental working which is demonstrated in the vision of ‘Ending Homelessness Together’. Furthermore, the Housing Executive acknowledges the importance of engagement of those with lived experience in the development and delivery of homelessness services, including the Homelessness Strategy.</p>

	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>The provision of support services provided within social housing to maintain tenancies is may not be available to those living in the private rented sector.</p> <p>All associated information should be provided in methods and formats accessible to the identified audience both in terms of language and dissemination channels.</p>	<p>Agreed – The Annual Action Plans will seek to allocate actions to responsible department(s) and reporting officer(s).</p> <p>Noted – The Housing Executive acknowledges the importance of this data and will explore how we can gather, including the identification of data gaps, and use such data over the course of the Homelessness Strategy.</p> <p>Noted – this will be a key consideration in the development of any actions relevant to this action.</p> <p>Noted – The Housing Executive will ensure this is considered as part of our equality obligations in delivering the Homelessness Strategy 2022-27.</p> <p>Noted – The Housing Executive will consider the provision of supports services to those living in the private rented sector as part of the development of our annual action plans.</p> <p>Noted – The Housing Executive will ensure this is considered as part of our equality obligations in delivering the Homelessness Strategy 2022-27.</p>
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	<p>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.</p> <p>Data within the draft Strategy reported single males accounted for 36% reference person households during the year 2020/216. 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.</p> <p>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 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.</p> <p>The Commission continues to recommend the collection of comprehensive data to identify equality impacts and shape</p>	<p>Noted - Destitution of refugees and asylum seekers is an issue 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 Homelessness Strategy 2022-22.</p> <p>Noted – The Strategy notes a commitment to review our projected needs on an annual basis and this review will consider comments such as this, along with any other emerging needs that data or trends may point to.</p> <p>Noted - Destitution of refugees and asylum seekers is an issue 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 Homelessness Strategy 2022-22.</p>
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	<p>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. 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.</p>	<p>Noted – The Housing Executive will ensure this is considered as part of our equality obligations in delivering the Homelessness Strategy 2022-27.</p>
<p>Extern</p>	<p>Yes/No responses generally supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>Extern very much supports this aim but we feel that this needs to be quantified- as in the definition of chronic homelessness, there needs to be a clear descriptor for 'brief' and 'non-recurring'.</p> <p>We support all of these principles, although in relation to "Value for money" this should not equate to the cheapest. Services involved in strategy support and delivery need to be adequately resourced.</p> <p>Extern strongly supports the principles of 'person-centred' and 'responsive' and 'innovative'. These principles are achievable without the need for significant resourcing as many of these are fundamental to service provision already. Rather, they require significant commitment from relevant</p>	<p>Noted – While the revised version of the Strategy does not quantify 'brief' and 'non-recurring' the Housing Executive will engage with the Central Homelessness Forum and Local Area Groups in seeking to provide a descriptor as suggested.</p> <p>Noted – The Housing Executive acknowledges this point.</p> <p>Noted – The Housing Executive has provided a general comment in response to all comments on funding in the introduction of this document.</p>

	<p>Government Departments which is where the focus needs to be fixed if ending homelessness is to be delivered</p> <p>Objective 1 - We would welcome clarity on how other government departments will input into the implementation of the Strategy. We agree with the objective, but prioritising homelessness prevention requires significant commitment from other government departments. There should be an understanding that health, finance, employment, education, and the justice system all should be mandated to collectively work on homelessness as it encompasses many departments.</p>	<p>Noted – As per the Homelessness Strategy 2017-22 the Homelessness Strategy 2022-27 will be supported by an Inter-departmental Homelessness Action Plan which will be developed by the Department for Communities and involve actions on behalf of other departments, including those referenced.</p>
<p>Fermanagh and Omagh District Council</p>	<p>Yes/No responses generally supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>The Council notes the aim of the objective as stated within the document as ‘to create a preventative environment where homelessness is rare, brief and non-recurrent.’ It may be worthwhile to include the need for of partnership working in this as well as striving to eliminate homelessness altogether.</p> <p>It is also worth pointing out that many community and voluntary organisations, as well as the Northern Ireland Housing Executive, carry out prevention work. Although the draft strategy refers to partnership working and working together, the Council is concerned that the majority of the</p>	<p>Agreed – The Housing Executive recognises the importance of partnership working as reflected in the vision of ‘Ending Homelessness Together’.</p> <p>Noted – The Housing Executive acknowledges the importance of other organisations across the sector in addressing homelessness. The annual action plans will seek to reflect the role that other organisations will have in delivering the Homelessness Strategy 2022-27.</p>

	<p>strategy is based on the Housing Executive’s internal housing solutions and supports. To ensure that the strategy is relevant to homelessness, there needs to be reference and commitments to involving external organisations and agencies that carry out important roles. Therefore, the Council feels that the document needs to be slightly more ‘external facing’ to ensure that there is sufficient partnership working to tackle the homelessness crisis in Northern Ireland.</p> <p>The Council commends the Housing Executive for the introduction of the Homelessness Prevention Fund. It has proved useful and beneficial for people at risk of being homeless by ensuring they are involved in prevention measures such as intervention models, training, personal development, etc. However, given the nature of the current economic climate (the impact of the pandemic and the potential impacts of UK Exit), there is the potential for the number of people using this funding to increase significantly.</p> <p>The Council also believes that any updated legislative framework should include a statutory duty to cooperate for each of the statutory bodies named in section 6A(5) of the Housing (Northern Ireland) Order 1988. Furthermore, the duty would be operationalised by a mechanism to allow the pooling of resources between Departments. From speaking with stakeholders, there has already been a significant</p>	<p>Noted – The Housing Executive has provided a general comment in response to all comments on funding in the introduction of this document.</p> <p>Noted – As per the Homelessness Strategy 2017-22 the Homelessness Strategy 2022-27 will be supported by an Inter-departmental Homelessness Action Plan which will be developed by the Department for Communities and involve actions on behalf of other departments. The wider point on legislation is beyond the remit of the Housing Executive but will be raised with the Department for Communities.</p>
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	<p>amount of work to develop proposals in this area and these could be reviewed and progressed relatively quickly.</p> <p>Safe, secure and appropriate accommodation and support will be essential to the effective implementation of this strategy – however, the Council would also suggest that accommodation and support is sustainable for the duration of this strategy as well. For example, given the potential in need over the next number of years, will the accommodation and support levels required be sustainable?</p> <p>There is also need to ensure a flexibility in approach between rural and urban areas. The majority of the Fermanagh and Omagh District is rural, with some areas being particularly disadvantaged in terms of isolation and access to services. It is very important that these more rural areas are not left behind and forgotten about as this will only increase the urban/rural divide. Locally, it is felt that there needs to be an increase in the short-term supply solutions (particularly for rural areas) to meet the immediate needs of those experiencing homelessness. It is impossible to deliver a person-centred approach, if the supply and support is not available at local levels within communities.</p> <p>Given the current challenges facing housing supply, availability and homelessness the Council would urge the Housing Executive (and the Department) to have a flexible</p>	<p>Noted – The Housing Executive has provided a general comment in response to all comments on funding in the introduction of this document.</p> <p>Noted – The Housing Executive chairs a Homelessness Local Area Group in Fermanagh and Omagh District and through this group recognises the challenges in rural areas. The wider point on housing supply will be raised with the Department for Communities in context of alignment of the Homelessness Strategy 2022-27 and Housing Supply Strategy.</p> <p>Noted - The wider point on housing supply will be raised with the Department for Communities in context of alignment of the Homelessness Strategy 2022-27 and Housing Supply Strategy.</p>
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	<p>approach to funding based on potential need. There is no denying that services are currently stretched, however as the impacts of the recent pandemic continue services could be stretched even further and additional funding could be required.</p> <p>The Council would welcome the completion of an Equality Screening Report on the draft strategy. The strategy is significant in terms of its importance not only to the Housing Executive but also in terms of its impact across the Fermanagh and Omagh District and Northern Ireland as a whole.</p> <p>The Strategy should also be a live document that can be changed/amended to ensure that any new need, or unforeseen circumstance, can be addressed.</p>	<p>Noted – The Housing Executive has completed an Equality Screening Report for the Homelessness Strategy 2022-27 and will share this with Fermanagh and Omagh District Council.</p> <p>Agreed – The Housing Executive recognises this point in the context of our intention to develop annual action plans in the delivery of the Homelessness Strategy 2022-27.</p>
<p>First Housing Aid & Support Services</p>	<p>Yes/No responses supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>First Housing completely agrees and welcomes the vision of co-production and co-design as laid out in the Draft Strategy 2022-27. We have been fully engaged in the consultation process. We believe that Ending Homelessness Together can work if supported by a mandate from Government that directs other organisations working with homeless people to take ownership this Strategy.</p>	<p>Agreed – The Housing Executive is committed within the draft Homelessness Strategy 2022-27 to support legislative review to improve service delivery for homeless people.</p>

	<p>We welcome the preventative response given and accept that homelessness is a traumatic circumstance affecting individuals, families and their children. It is our view that if we can do things to alleviate the situation upstream prior to it escalating then we have a responsibility to do so. This means that the voluntary, community and all statutory bodies must be part of the response.</p> <p>First Housing would like to be involved in the discussion and expansion on prevention and what that looks like, moving forward, and more importantly some clarity on how we will measure and report on the outcomes.</p> <p>As a sector we fully accept and recognise that some of our accommodation was set up over a decade or more and they do not fit the models of need presenting in 2022. We have witnessed huge complexity in need and people unable to sustain temporary accommodation. We are keen to work with the Housing Executive on this strategy moving forward. In the Strategy we see scope for remodelling of some current services. There is also mention of Housing First and Housing Led approaches.....less familiar with housing led and what is involved in service delivery.</p> <p>We believe that the Central Access Point for referrals offering assessments that can rapidly decide on what support should be delivered within a person centred ethos could aid a more responsive model of support. We are</p>	<p>Agreed – The Housing Executive will work with all relevant statutory, voluntary and community agencies in the prevention of homelessness.</p> <p>Noted - The Housing Executive will engage firstly with the Central Homelessness Forum, including FHASS, in the discussion and expansion of a prevention definition.</p> <p>Agreed - The draft Homelessness Strategy 2022–27 commits to a cross departmental and inter agency approach and recognises the complex nature of homelessness and the requirement of input from across Government. The Housing Executive would welcome Homelessness Champions across different Govt. Departments.</p> <p>Noted – The Housing Executive is keen to work with all support agencies to address any gaps in service which are emerging. The Final Strategy document will provide further clarity on the definition of housing led. Agreed - The Common Assessment Framework and Central Access Point are key actions within the</p>
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	<p>disappointed with the draft Strategy that this has not been afforded any degree of prominence.</p> <p>Chronic Homelessness: within the Strategy this group seem to be assimilated into homeless and they seem to have got lost regarding what we can do to alleviate their situation. If the Strategy is to be wholly client centred some recognition needs to be given to the fact that currently there is a cut off for floating support of 2 years.</p> <p>The private rented sector is not the panacea for homeless people. Much needs to be done with the private rented sector regarding security and affordability the latter most crucial and we believe some thought needs to be given on resource mechanisms to help people with access. We feel if PRS is to become an offer of choice work also needs to be completed focussing on legislation and standards in the PRS.</p> <p>We would ask for detail on what improving housing options is with the current lack of supply witnessed by the sector.</p> <p>The Strategy would lead one to believe that Housing First and Housing Led approaches are a more permanent solution placing people in their community and building support around them. We feel that we need more clarity on this and</p>	<p>current Homelessness Strategy 2017-22 and these services will continue to be addressed through the next Homelessness Strategy 2022 - 27.</p> <p>Noted - While we do not name all individual client groups vulnerable to homelessness, the person centred approach within the Strategy is designed to ensure that the specific needs of each client are taken into consideration to ensure the delivery of a holistic housing and support package for the client. It is the intention to add “indicators” for chronic homelessness to our Housing Management System to allow for the identification of service gaps by location.</p> <p>Noted – As noted earlier in this document the issue of housing supply (including regulation of the private rented sector) will be brought to the Department for Communities for consideration, particularly in context of alignment with the Housing Supply Strategy.</p> <p>Accepted – The Homelessness Strategy 2022-27 will provide further clarification on this.</p> <p>Not accepted - Housing Led approaches which include Housing First are widely regarded as permanent housing solutions and no legislative change would be required to utilise such approaches.</p>
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	<p>if legislation is to change to consider such options as permanent and not temporary.</p> <p>An important point for First Housing is we need the skilled staff to deliver the ambitions of the Strategy and this will not come with contracts that are over 15 years old with no annual uplift.....we are haemorrhaging staff due to poor wages, poor terms and conditions and no career development.....</p> <p>We are encouraged by the ambitions of the strategy that seeks to understand the person and the needs presenting, offering accommodation and support that best meets their needs.</p> <p>Undeniably there is a need for increase in housing supply and broader housing options if the ambitions of the strategy are to be realised. The Strategy needs to be firmly linked with the Housing Supply Strategy.</p> <p>Implement mechanisms to ensure people exit homelessness as soon as possible with the right support – we would agree this is a good action but we require some detail on what these mechanisms are.</p> <p>First Housing believes that if the ambition is for support to be available to all at the point of need some consideration needs to be given to expand support services to deal with capacity and service. It must be highlighted this situation is</p>	<p>Noted – The Year 1 Action Plan includes a commitment to review and consider the findings of a project which seeks to identify challenges facing sector in terms of retention & recruitment of staff.</p> <p>Agreed – The draft Homelessness Strategy 2022–27 is committed to engaging directly with clients with lived experience.</p> <p>Noted – As noted earlier this issue will be considered as the Housing Executive works with the Department for Communities on the alignment of the Homelessness Strategy 2022-27 and the Housing Supply Strategy.</p> <p>Agreed - Further clarity on specific actions will be provided within the annual actions plans.</p> <p>Noted – The Housing Executive will work with colleagues in the Rural and Regeneration Unit and Supporting People to address rural inequity throughout the course of the Homelessness Strategy 2022–27.</p>
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	<p>more prominent in rural areas to find accommodation away from their support networks.</p> <p>Within the Strategy there is reference to Housing First and Rapid Rehousing for those experiencing multiple needs. We are familiar with housing first but have no comparable illustrations of rapid rehousing given the numbers of people waiting in temporary accommodation that require accommodation to meet their needs. We believe that this should be explored further with the sector as to how this is to be achieved.</p> <p>Moving forward the sector could work closely with groups (chronic homelessness) to raise awareness and foster understanding of those who have experienced homelessness. We feel that the Homelessness Prevention fund could be used to provide funding to develop such links.</p> <p>First Housing are happy with the monitoring and reporting framework as laid out within the Strategy. It is our view that the Annual Action Plans, quarterly reports to drive implementation and the publishing of an annual progress report is a sound basis for monitoring and reporting.</p>	<p>Noted – The Housing Executive Acknowledges the current supply challenges but retains rapid rehousing as a long term ambition. The Housing Executive welcomes the support in working with the sector to realise this ambition.</p> <p>Agreed – The Housing Executive is keen to promote the Homelessness Prevention Fund for all relevant client groups.</p> <p>Agreed – The proposed monitoring and reporting will remain as suggested given the majority of comments are in support of current structures.</p>
Foyle Women’s Aid	<p>There was agreement with all yes/no questions on the template. All suggested actions related to each Objective will also be considered as part of the development of annual actions plans.</p>	

	<p>Vision: To eradicate homelessness and its devastating impacts should be a key priority in NI. There should be regional cross departmental, time bound and resourced target to end the blight of homelessness.</p> <p>Improved links to SP funded services to ensure their maximisation and integration to the out workings of actions arising from the Strategy will be key to its success.</p> <p>There is a growing trend of hedge funds buying up properties and creating substandard private accommodations that fit their short term profit agenda of the business model but is incongruent to the eradication of severe housing distress.</p> <p>Aim: Agree. Response outlines specific projects and programmes related to domestic violence that they operate which they feel should be supported.</p> <p>As NIHE move forward with actions to promote prevention, a recognition that domestic violence causes homelessness is imperative and key time bound targets built in to all plans.</p> <p>Response refers to the complexity of homelessness for women that have experienced domestic violence. It refers to motivated perpetrators whose actions are unpredictable increasing the difficulties for women fleeing violence and limited sanctions on perpetrators. The response requests</p>	<p>Agreed – The Homelessness Strategy 2022-27 highlights the need for cross sectoral/departmental working and funding is a key enabler of this approach.</p> <p>Agreed – The Homelessness Strategy 2022-27 acknowledges the need for all relevant strategies to align.</p> <p>Noted – The Housing Executive will provide comments to DfC to support the development of the Housing Supply Strategy.</p> <p>Noted – The Housing Executive recognises the importance of specialist services and will endeavour to support the development of relevant services through the delivery of schemes such the Homelessness Prevention Fund.</p> <p>Noted – The Housing Executive acknowledges Domestic Abuse as a reason for homelessness. Strategy Action Plans and any other relevant plans will contain key targets and timescales.</p> <p>Noted – The Housing Executive acknowledges the complexity experienced by women experiencing domestic violence and agrees with the requirement for joint actions with other agencies to properly address these issues. The Strategy commits to developing relevant partnerships and will continue to develop its</p>
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	<p>“a focus on offending behaviour and criminal damage in homes and joint actions with others to address this”</p> <p>Principles: Agree with all.</p> <p>Comment: Throughout the implementation of this strategy it will be vital to ensure a gendered approach. If a person centred principle can be delivered upon then a gendered approach to the specific needs of women, women with children and women accessing both refuges and hostels on a temporary basis at crisis point will be required.</p> <p>Objective One: Comment: “while the objective of prioritising homelessness prevention is valuable and necessary, this broad area of work will take considerable time for positive outcomes to arise. Objective two and three should therefore be given equal weight throughout the lifetime of the strategy.</p> <p>We must respond to: Pre pandemic issues such as throughput in refuges linked to secure appropriate accommodation.</p> <p>Increased demand directly from the pandemic for victims of domestic violence</p>	<p>joint approach to tackling domestic violence. NIHE will support the implementation of the Executive Strategy dealing with violence against women and girls.</p> <p>Noted - Gender will be a key consideration factor in the delivery of person centred housing and support responses.</p> <p>Agreed - All objectives will be given equal weight throughout the lifetime of the Strategy.</p> <p>Agreed – The Homelessness Strategy 2022-27 acknowledges the need for robust housing supply and will support the development and delivery of Housing Supply Strategy.</p> <p>Noted - The COVID-19 Reset Plan has analysed the data and highlighted the relevant groups impacted by the pandemic and will seek to develop appropriate responses.</p>
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	<p>Increased resourcing of floating support services which can have the most impact of prevention.</p> <p>Primary Prevention: The expertise of Women’s Aid and out service users can and should be consulted to ensure that the necessary understanding of the unique needs of women who experience homelessness and threat of homelessness because of domestic violence result in prevention activities that are truly effective.</p> <p>While increased utilisation of the private sector is necessary it does not provide the security of tenure that NIHE and Housing Association accommodation does. It can often present problems in relation to standard of accommodation and it can also mean that women who experience domestic violence are penalised for the actions of a motivated perpetrator.</p> <p>Secondary Prevention: Consideration should be given to the development and implementation of regional training standards particularly for Floating Support services as this will embed the knowledge and skills required to best result in prevention.</p> <p>Responding to the most common reasons that lead to people presenting as homeless is essential to prioritisation of future actions for NIHE however, reliance on NIHE</p>	<p>Noted – The Housing Executive acknowledges the impact of floating support services.</p> <p>Noted – The Housing Executive welcomes the opportunity to work with Women’s Aid and its service users.</p> <p>Agreed - The Housing Executive in its exploration of the extension of housing options will seek to work in partnership to understand the issues related to domestic violence to develop appropriate tailored solutions.</p> <p>Agreed - The Housing Executive is committed to the ongoing improvement in training and staff development as noted in the Staff enabler.</p> <p>Agreed – The Housing Executive is committed to the improvement of data analysis, the development of cross sectoral data sets as well as commissioned research to better understand the experiences of clients experiencing homelessness.</p>
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	<p>presenter data does not lead to a full understanding of the routes into homelessness for all services users.</p> <p>Tertiary Prevention: A lack of regulation for landlords in NI has put some of our very vulnerable clients at risk because of poor accommodation, cohesive control, and other inappropriate practice. This is not an adequate or safe model and should not be a substitute for proper housing investment.</p> <p>Objective Two: Agreed. This objective must be underpinned by a true understanding of the needs of service users, their routes to homelessness and barriers to exit.</p> <p>Objective Three: Agreed Appropriate specialist services are required to deliver long term tenancy sustainment for those exiting homelessness as the actions necessary to enable sustainable tenancies are not generic. This is particularly true for women fleeing domestic violence.</p> <p>Monitoring and Reporting:</p> <ol style="list-style-type: none"> 1. KPI informed by comprehensive data. 2. Central Homelessness Forum should be utilised to monitor. 3. Expert Led responses 4. Annual cross sectoral feedback in virtual or in person events 	<p>Noted – These comments will be provided to DfC for consideration in the development of the Housing Supply Strategy.</p> <p>Agreed - The Housing Executive welcomes the offer of support from Women’s Aid to share their expertise and that of their service users.</p> <p>Agreed – The Homelessness Strategy 2022-27 is committed to the development of tailored solutions.</p> <p>Noted – The Housing Executive acknowledges these comments, all of which will be considered in the delivery of the Homelessness Strategy 2022-27.</p>
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	<p>5. Keep in mind the moral obligation to jointly leave a legacy of a home for everyone</p>	
<p>Homeless Connect</p>	<p>Yes/No responses generally supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>We believe the vision of ‘Ending Homelessness Together’ is the right vision for this strategy. The detrimental impact of homelessness economically, socially and personally has been well documented.¹ The ultimate aim of homelessness policy should be to bring about the end of homelessness.</p> <p>We agree with all seven of the principles outlined. We particularly welcome the inclusion of “those who have lived homelessness” as a part of the ‘Expert Led’ principle.³ We would submit that this should be rephrased to state “being led by those who have lived experience of homelessness”, but the principle remains the same and very much welcome.</p> <p>We believe that this objective should be worded in line with the objective set out on p25: “Prevent homelessness from happening in the first place” which in our view is a more accurate reflection of what we want to achieve. (There should be consistency throughout the document in this regard.)</p> <p>The use of the trifecta of Primary, Secondary and</p>	<p>Agreed – The Housing Executive is keen to continue work with Homeless Connect and member organisations in order to deliver the vision of ‘Ending Homelessness Together’.</p> <p>Accepted – this change will be made.</p> <p>Not accepted – The suggestion to change Objective 1 has been considered in the context of overall comments and quantitative analysis, the vast majority of which noted agreement with ‘Prioritise Homelessness Prevention’ as Objective 1.</p> <p>Accepted - this changed will be made.</p>

	<p>Tertiary prevention is appropriate and helpful. We would submit that the final document should provide a citation to the research paper where this typology was originally set out so that the terms can be understood in context.</p> <p>The four criteria set out as to “what will success look like” are helpful in so far as they provide a broad picture of success. Ultimately though, the criteria do not provide clear measurables by which to assess success. In the final strategy we would submit the Housing Executive should provide clear measurements by which the success or the failure of the strategy can be assessed.</p> <p>In the Housing Executive’s research on Homelessness Service User Journeys, one of the recommendations set out is as follows: “Preventative strategies need to be embedded in... wider service delivery rather than being solely discrete and separate preventative programmes.” This is a valid point and one which we would recommend the Housing Executive bears in mind as it seeks to take forward actions to prevent homelessness.</p> <p>At this point we want to flag a particular issue we have with the draft Strategic Action Plan for Temporary Accommodation (hereafter referred to as SAPTA). One of the four “ambitions” outlined in the SAPTA is to “minimise demand for temporary accommodation.” In our estimation, this should not be an ambition within the draft SAPTA. We submit that the SAPTA should instead focus on the provision</p>	<p>Accepted – While the Housing Executive accepts this point, it is our intention to work with stakeholders on appropriate measures for the criteria and while the Strategy will note a commitment to do so it will be possible to have these measurements developed and agreed ahead of publication.</p> <p>Agreed – The Housing Executive, as reflected in the Homelessness Strategy 2022-27, acknowledges significant progress facilitated by projects funded by the Homelessness Prevention Fund. We acknowledge the impact that prevention can have in wider service delivery. While we intend to continue with the delivery of the Homelessness Prevention Fund, funding permitting, we will explore how preventative strategies can be embedded beyond this programme.</p> <p>Not Accepted – The Housing Executive views homelessness prevention as an intrinsic part of the Strategic Action Plan for Temporary Accommodation, particularly with regards to minimising demand. It should however be noted that a number of prevention actions from the Strategic Action Plan for Temporary Accommodation are included in the Homelessness Strategy 2022-27 Year 1 Action Plan.</p>
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	<p>of temporary accommodation which for the foreseeable future will be a significant part of this society’s response to homelessness. This is not to suggest that minimising demand for temporary accommodation should not be a key objective for the Housing Executive. We believe that some of the actions set out under minimising need for temporary accommodation (p16 of the draft plan) should be incorporated in to the prevention objective of the Homelessness Strategy itself. Many of the actions included there would fall under the rubric of “preventing homelessness in the first place.”</p> <p>We believe the Housing Executive should conduct a detailed evaluation of the measures adopted to prevent homelessness in this jurisdiction to determine ‘what works’ in preventing homelessness. A fundamental challenge with assessing the actions set out in the strategy is the lack of a detailed evidence base of current measures adopted to prevent homelessness here...we believe it should be a priority action for the first year of the strategy. Such an evaluation should be conducted in conjunction with the homelessness sector here.</p> <p>We would submit that a further discrete piece of work should be conducted by the Housing Executive on homelessness prevention measures adopted in other jurisdictions on these islands and beyond. This piece of work should not only focus on how other jurisdictions prevent</p>	<p>Agreed – This is reflected within the enablers in the Homelessness Strategy 2022-27.</p> <p>Noted – The Housing Executive acknowledges the importance of research and the commissioning of independent research is considered a key aspect of the experiential evidence enabler as per the Year 1 Action Plan.</p>
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	<p>homelessness but also should consider how they assess the effectiveness of homelessness prevention measures.</p> <p>The response to the Covid-19 pandemic illustrated that effective cross-departmental and inter-agency working is possible. It would be tragic if this is allowed to atrophy during the life of this strategy.</p> <p>“Raise homelessness awareness through programmes which are co-designed with those who have lived homelessness.” We would submit this action should be combined with the action in the SAPTA which states the following: “Deliver public awareness campaign to shift mind-sets towards and raise awareness of homelessness prevention.” One possible alternative would be as follows: “Deliver public awareness campaign co-designed with those with lived experience of homelessness to raise awareness of homelessness and the importance of homelessness prevention.”</p> <p>“Improve housing options to help people stay in their homes or find suitable accommodation before any homeless crisis.” We would welcome further clarification on this action in terms of the meaning of the phrase “improve housing options.”</p> <p>We would further welcome clarity as to what would constitute success for the prevention fund and how the</p>	<p>Agreed – The Housing Executive recognises the collaborative efforts that have guided the wider sectoral response to COVID-19, including the Reset Plan, and is committed to working with our partners to continue this partnership working,</p> <p>Noted – The Housing Executive has included the action from the SAPTA in the Homelessness Strategy 2022-27 and will include a specific meeting with the Service User Forum on homelessness prevention, at which co-design of this action will be considered.</p> <p>Accepted – this will be clarified in the final Strategy.</p> <p>Noted – The Homelessness Prevention Fund will align with the agreed definition for homelessness prevention which will be</p>
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	<p>Housing Executive defines “homelessness prevention outcomes.” We would infer that this would be measured against the recently adopted P1E definition of homelessness prevention, but this is not stated here.</p> <p>“Develop new preventative pathways for the groups at highest risk of rough sleeping and homelessness.”... A further noteworthy point regarding this action which was raised by our Public Policy Forum members is that on occasion staff working for service providers outside of the homelessness sector (say in education or family support) sometimes do not know who to speak to if they believe a household is at risk of homelessness to see if support is available. In developing preventative pathways, this should be borne in mind.</p> <p>“Develop preventative services to respond to the most common reasons people present as homeless before they lead to homelessness.” This is a welcome action. We would welcome more detail on what is envisaged here...Addressing these issues should be a part of the Interdepartmental Homelessness Action Plan process.</p> <p>“Target those groups most impacted by COVID-19 or address issues exacerbated by the pandemic which increase the risk of homelessness.” We would submit that it would be helpful if this goal could be reworded for the purposes of clarity...For the purposes of this goal, we would ask for</p>	<p>subject to agreement with the Central Homelessness Forum. It should be noted that while outcomes can be attributed to secondary and tertiary prevention, the upstream prevention work associated with primary prevention will not be covered by the proposed definition.</p> <p>Accepted – The Housing Executive will consider how we can engage with service providers outside of the sector. It should be acknowledged that the delivery of such an action may be in a later action plan rather than being included in the Year 1 Action Plan.</p> <p>Noted – further detail will be provided in the publication of annual action plans. The reference to the Inter-departmental Homelessness Action Plan will be raised directly with the Department for Communities for consideration in future iterations of the Inter-departmental Homelessness Action Plan.</p> <p>Accepted – The Housing Executive will amend the Strategy to note that ‘groups most impacted by COVID-19’ will be identified by analysis of various types of data. As an example, in 2020/21 data and engagement with other organisations such as the PSNI noted the impact of the pandemic on domestic abuse as a reason</p>
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	<p>further clarification on how the Housing Executive will determine who the “groups most impacted by COVID-19” are.</p> <p>“Implement measures to ensure people exit homelessness as quickly as possible with the right support.” We wholeheartedly agree about the importance of this goal. We would submit, however, that it may be better suited to Objective 3 rather than Objective 1 unless this action is envisaged to be about preventing repeat homelessness. If this is the case, it should be made clear.</p> <p>Secondly, under the Primary Prevention actions, we would recommend consideration be given to inclusion of an action focused on homelessness prevention early in the lives of children and young people...We agree with this recommendation and submit the Housing Executive should seek to implement it in the final Homelessness Strategy document. The remit of the actions recommended here goes beyond the Housing Executive, but it should be considered under the ambit of the Interdepartmental Homelessness Action Plan.</p> <p>Thirdly, we believe that Housing Supply should also be viewed as a key primary prevention measure...We believe that an additional bullet point should be added in to refer to housing supply on p30 of the strategy with a mention of the</p>	<p>for homelessness. This is an example of how the Housing Executive will determine such groups with any relevant commentary to be provided in future iterations of the Annual Action Plans or Annual Progress Reports.</p> <p>Accepted – Although this action refers to homelessness generally the Housing Executive acknowledges the point made by Homeless Connect and this will include a reference to repeat homelessness.</p> <p>Noted – This will raised directly with the Department for Communities for consideration in future iterations of the Inter-departmental Homelessness Action Plan.</p> <p>Accepted – This amendment will be made.</p>
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	<p>fact that it will be considered in greater detail under objective three.</p> <p>Fourthly, we submit that legislative reform should be added as an action under Primary Prevention...It is acknowledged that it is not for the Housing Executive to reform legislation. However, the Housing Executive has a key role alongside the homelessness sector in pushing for much needed reform. Consequently, we believe an action should be incorporated in this regard.</p> <p>Objective 2 – The consultation response provides a number of comments in relation to actions in objective 2 and outlines where each of the actions outlined in the current draft strategy should be reallocated under objective 1, 3 or in the SAPTA.</p>	<p>Noted – The Housing Executive would note that legislation is an enabler and the Year 1 Action Plan includes an action to ‘We will liaise with the Department for Communities in identifying any legislative amendments which are required.’</p> <p>Noted – While of these comments were considered and the Housing Executive acknowledges the rationale behind each of the suggestions the feedback has been considered in the context of the overall consultation response. As noted earlier in this document, this consultation exercise has noted significant support across the actions and objectives and while the Housing Executive would note the significant detail provided by Homeless Connect the actions have remained where they are in the context of a wide range of feedback provided during the period of consultation. The consultation response from Homeless Connect is available via this link and the Housing Executive would refer to the above comment in relation to any comments suggestion movement of actions between objectives. The Housing Executive has therefore kept comments on the remainder of the document limited to those points which did not suggest movement of actions.</p>
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	<p>Ensure arrangements are in place through which we will listen and respond to people with lived experience of homelessness in the design and delivery of services.” We strongly welcome this action. We believe that this action should be incorporated in to the SAPTA as well as under objectives 1 and 3 of the Strategy. The development of the service user voice is crucial. We would welcome further conversations with the Housing Executive to discern how it will ensure the engagement is substantive, meaningful and properly funded. It should be noted that if this service user involvement is not conducted properly, it may have counterproductive effects. As academic Mark Evans puts it, “the success of co-design is all in the doing. Done badly it can exacerbate social exclusion and destroy trust systems; done well it can help stabilize turbulent lives, improve life chances and foster trust systems.”</p> <p>It should also be noted that an aspect of the development of these arrangements could involve the development of a peer support service. In the final Chronic Homelessness Action Plan for 2019-2022, one of the actions put forward was to “Encourage the development of peer support to help chronic homeless.” This action was included as part of Objective 4 of the Action Plan and admittedly it was stated that it would only be taken forward if more resources were available. This action, however, is not included in the draft Homelessness Strategy for 2022-2027. We believe there is a convincing case for the Housing Executive to consider the development of a peer support service alongside the</p>	<p>Noted – Lived experience will be a theme that guides the delivery of the Homelessness Strategy 2022-27 as a whole. The Housing Executive will provide further details to relevant stakeholders as and when further information is available and would note the Year 1 Action Plan includes an action to appoint a Strategic Partner to develop and implement a Lived Experience Programme.</p> <p>Noted – Through Department for Communities Change Fund the Housing Executive manages a Peer Support Project delivered by the Northern Ireland Youth Forum. While this project focuses on young people the Housing Executive will consider lessons learned over the course of this project in the implementation of any further peer support models for other client groups.</p>
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	<p>structure used for co-design with service users. This would potentially strengthen this and allow for the development of support networks to prevent and ameliorate homelessness. Part of our RSUN project involves peer support for those who are using or have used substances. There is some overlap between this group and those experiencing chronic homelessness. We would submit there is valuable learning available from the experience of RSUN on how this could be achieved.</p> <p>Objective 3 – We have two comments to make on the wording adopted here. In contrast to Objective two, the language used here is “settled accommodation”. We are not opposed to this wording. However, in Objective Two the language used is that of “secure” accommodation. We are not sure of what the rationale is for the difference. There may be a strong argument for the use of these different terms. However, if there is not, we would submit there should be consistency in the language used.</p> <p>Secondly, following a session with service users with lived experience of homelessness held with RSUN, we would highlight the importance of taking care with the language of “exiting” homelessness. For some of the service users who participated in the consultation event, the language of ‘exiting’ is too black and white for the reality of what leaving homelessness is like. Used improperly, it can give the impression that those who have exited homelessness have</p>	<p>Accepted – The Housing Executive will amend this to include ‘settled’ across both objectives.</p> <p>Not Accepted – While the Housing Executive acknowledges and has considered this comment the Homelessness Strategy 2022-27 outlines the support that this Strategy intends to facilitate as households transition to settled accommodation.</p>
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	<p>everything sorted when the reality can be much more complex and challenging. Further reflection on this language with service users would be worthwhile.</p> <p>On p40, the following paragraph is included: “We want to see a significant shift towards rapid rehousing including Housing First for those it is appropriate for. It provides ordinary, settled housing as a first response for people with multiple needs, i.e. those who are chronically homeless.” There are a number of difficulties with this paragraph. Firstly, it is unclear whether the sentence “it provides ordinary, settled housing as a first response for people with multiple needs” is a description of Housing First or a description of Rapid Rehousing. Either way, the definition here does not provide a solid definition of either concept and we would submit the Housing Executive utilise clear and accurate definitions of both terms in the final Strategy. Thirdly, the description outlined here includes the provision of “ordinary” housing. We do not know what this adjective is included for. We would submit this paragraph should be rewritten.</p> <p>“Significant shift to rapid rehousing”- We warmly welcome this criterion. We do, however, believe that in the final strategy document a clear definition of the term “rapid rehousing” should be provided. It is crucial this term is defined in the final strategy document as it is not self-evident.</p>	<p>Noted – The Housing Executive will consider amending this paragraph to reflect this comment.</p> <p>Accepted – The Homelessness Strategy 2022-27 will provide clarification on this.</p>
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	<p>“Sustained tenancies within enabled communities.” Again, we welcome this criterion. It would be helpful to know what the Housing Executive means by the term “enabled communities.”</p> <p>“Extend Housing First provision in Northern Ireland on a cross tenure basis with a focus on improving access to permanent housing for these customers.” We strongly support the extension of the use of the Housing First model for the cohort of individuals experiencing chronic homelessness. We believe Housing First has a strong international evidence base to support its effectiveness in supporting those experiencing chronic homelessness.²² We welcome the emphasis the Housing Executive give to the expansion of Housing First. However, we have some questions about the wording utilised here. Why has the term “cross tenure” been included in this action and what is meant by “permanent housing”? Greater detail would help to avoid confusion in this area.</p> <p>We also note that the SAPTA includes the following action under its first indicator for success: “Continue to build Housing First services across Northern Ireland by offering Housing Executive Housing First tenancies.” However, we are not sure how these two actions precisely relate to each other. One calls for an extension of Housing First provision on a “cross tenure” basis while the other points to an expansion of Housing First through provision of Housing Executive Housing First tenancies. We would suggest these</p>	<p>Accepted – The Homelessness Strategy 2022-27 will provide clarification on this.</p> <p>Accepted – The Homelessness Strategy 2022-27 will provide clarification on this.</p> <p>Accepted – The language on these actions will be consistent across the Strategy and SAPTA.</p>
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	<p>two actions be combined and reworded to provide clarity on how this will be done.</p> <p>“Deliver the Chronic Homeless Action Plan reflecting on the lessons learned both from the Strategic Review of Temporary Accommodation and the COVID-19 Homelessness Response.” We do not believe this action should be included since the Chronic Homelessness Action Plan was due to run for three years from April 2019 to March 2022 and will be finished before the Homelessness Strategy comes in to operation.²⁴ It had been our understanding that the Chronic Homeless Action Plan (CHAP) would be rolled in to the Homelessness Strategy going forward. If the intention is to continue actions outlined in the CHAP, a different way of phrasing this action would provide greater clarity.</p> <p>“Evaluate and extend the Complex Lives approach in Northern Ireland.” We strongly welcome the inclusion of this action. The introduction of the ‘Complex Lives’ approach shows significant potential in Belfast for helping statutory agencies and homelessness services work together to better support those experiencing chronic homelessness. The support of this approach provides an excellent example of the Housing Executive listening to research findings and responding. We have engaged with those involved in introducing the scheme here and commend them for their work thus far. It is appropriate to evaluate how it has worked and whether it can or should be</p>	<p>Accepted – The Homelessness Strategy 2022-27 will provide clarification on this.</p> <p>Accepted – The Homelessness Strategy 2022-27 will be amended to reflect this.</p>
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	<p>extended to other parts of Northern Ireland. We would submit though that before committing to extending the use of the Complex Lives approach, it would be appropriate to conduct an evaluation.</p> <p>We would highlight four points which are missing from the actions included here. The first is reference to support for Homelessness Awareness Week. The Housing Executive does provide support for this week in practice, but it would be helpful for an additional action to be included specifically referring to it. This could be as simple as stating “Support and promote Northern Ireland’s Homelessness Awareness Week.”</p> <p>Secondly, we note that there is no mention of programmes to provide basic household goods and furniture to assist in sustaining tenancies. We know from experience how valuable the provision of a starter pack can be in terms of assisting tenancy sustainment. 26 Support for these schemes focused on tenancy sustainment should be explicitly mentioned as an action in the strategy.</p> <p>Thirdly, we note that on p23 of the draft strategy reference is made to “a need for this strategy to engage with the business sector in assisting those households who are homeless or threatened with homelessness.” We welcome the inclusion of this section of the strategy. However, we would highlight that none of the actions in the strategy explicitly mention the involvement of the business sector. In</p>	<p>Accepted – This will be included in the Year 1 Action Plan.</p> <p>Accepted – This will be included in the Year 1 Action Plan.</p> <p>Noted – The Housing Executive acknowledges that further detail would be beneficial on this and it is an action that will be developed in future action plans as the Housing Executive establishes connections with business and the appropriate actions that arise from such connections.</p>
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	<p>the final strategy, we would ask for an explicit mention of the involvement of the business sector in at least one of the actions included.</p> <p>Fourthly, we note the absence of any reference to the Fundamental Review of Social Housing Allocations.²⁷ In our view, reference to the implementation of this review needs to be included in this section of the strategy considering the clear and obvious impact reforms to the system will have on those at risk of or experiencing homelessness. As the Housing Executive is a central actor in this area, actions related to this issue should be included in the final strategy.</p> <p>We would like to commend staff at the Housing Executive for the widespread pre-consultation they engaged in on this draft strategy. It is evident in reading the strategy that the Housing Executive has in many ways listened to stakeholders and it is important to acknowledge the diligent work of the officials involved. Homeless Connect welcomes the openness of Housing Executive staff in the development of the strategy which is a model for other statutory agencies to follow. We particularly commend the willingness of the Housing Executive to commit to increasing the involvement of service users and the honest reflections about past strategies in this regard.</p> <p>A general comment we would highlight regarding the strategy as a whole is the lack of any noticeable reference to a gendered analysis of homelessness. On p42 of the draft</p>	<p>Accepted – This will be included in the Year 1 Action Plan.</p> <p>Noted – The Housing Executive appreciates this comment and the input from Homeless Connect throughout this process, including the detailed consideration of the Homelessness Strategy 2022-27 in this response.</p> <p>Noted – The Housing Executive will consider how this comment can be addressed in the delivery of our annual action plans.</p>
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	<p>strategy, reference is given to the excellent research produced for the Housing Executive on the impacts of Chronic Homelessness on Women.²⁹ However, while reference is made to this report, on the face of the strategy its recommendations do not appear to be included in the draft document.</p> <p>It is notable that the draft Homelessness Strategy does not at any point mention the 2021-2031 Substance Use Strategy. In the interests of promoting joined up working between relevant departments, it would seem appropriate to consider how this strategy can marry up with the ten-year Substance Use Strategy.</p> <p>On p15, we highlight the last sentence: “It is acknowledged that there may be increased demand arising from households arriving to Northern Ireland e.g. cases seeking asylum.” This last phrase “cases seeking asylum” should be amended in the final version. Individuals seeking asylum should not be described as “cases”. They are persons with dignity and worth. This should probably read “e.g. individuals seeking asylum.”</p> <p>On p29, the phrases “Housing Led” and “Housing First” are introduced. No definition of the terms is provided at this point. On p44 a helpful definition of “Housing First” is provided. It may be helpful to include a reference to the definition there when the term is first used in the document. The term “Housing Led” is expanded on at p39. However,</p>	<p>Noted – The Housing Executive will consider how this comment can be addressed in the delivery of our annual action plans.</p> <p>Accepted – The Homelessness Strategy 2022-27 will be amended to reflect this.</p> <p>Accepted – The Homelessness Strategy 2022-27 will be amended to reflect this.</p>
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	<p>the description provided at that point could arguably be applied to “Housing First” and a reader who is unaware of these concepts may find it hard to understand what the difference is between them. It would be helpful if the Housing Executive could provide a clear definition, perhaps through a citation, as to what it means when it mentions “Housing Led” approaches.</p> <p>On p42, it is stated that “Research indicates that the longer an individual or household is homeless, the greater the impact on their health and well-being.” Whilst this is true, the draft strategy does not point to what research this is. It would be good practice for a citation to be included to this effect.</p> <p>On p52, it is stated that “The Housing Executive will continue to align with the Programme for Government.” In this section reference is made to the “Programme for Government 2016-2021.” No such programme in fact exists. A draft Programme was published and consulted on, but no Programme has been agreed by the Northern Ireland Executive. At the time the final strategy is released, such a Programme may have been agreed and it must be hoped that if no such Programme is agreed in this mandate that one will be agreed on in the next one. This paragraph needs to be rephrased to ensure it matches the factual situation pertaining to the Programme for Government.</p>	<p>Accepted – The Homelessness Strategy 2022-27 will be amended to reflect this.</p> <p>Accepted – The Homelessness Strategy 2022-27 will be amended to reflect this.</p>
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	<p>We would submit that consideration be given to inviting political parties represented in the multiparty Executive to nominate elected representatives to participate in a revised version of the Homelessness Strategy Steering Group. Ideally, these representatives would be Assembly members but it is appreciated that a degree of realism is needed about their ability to effectively participate. It is of note that in Scotland, the Homelessness Prevention and Strategy Group includes political representation from COSLA (the Scottish equivalent of NILGA) and the Minister responsible for homelessness policy.³³ It is of course appreciated that Northern Ireland is a different political context than Scotland and that this is not the only way more effective political engagement could be facilitated. However, we believe consideration should be given to resolving this issue.</p> <p>We would also submit that the Chair of the HSSG should be held by someone independent, outside of the Executive Departments who make up the group (as is the case in Wales with their National Housing Advisory Board).</p> <p>We would submit that consideration needs to be given to incorporating the voice of service users in to the monitoring process. It is accepted that this is not straightforward and we would welcome the opportunity to support the Housing Executive in facilitating this involvement. In our view, in line with the very welcome actions around service user involvement in both the SAPTA and the Homelessness</p>	<p>Noted – As the Homelessness Strategy Steering Group is chaired by the Department for Communities this comment will be passed to the Department for Communities.</p> <p>Noted – As the Homelessness Strategy Steering Group is chaired by the Department for Communities this comment will be passed to the Department for Communities.</p> <p>Accepted – This will be included in the Year 1 Action Plan. While the Year 1 Action Plan includes a commitment to host 4 Service User Forums the Housing Executive will consider how this engagement can be incorporate and/or extended to the monitoring process.</p>
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	<p>strategy, it would be appropriate to consider how best to incorporate service user involvement.</p>	
<p>Housing Rights</p>	<p>This response was one of a number which were not submitted on the consultation template provided and therefore no answers to the yes/no questions were received.</p> <p>The strategy's commitment to collaboration, which has been carried through from the last strategy, is welcome. However, in Housing Rights view this section needs significant strengthening to make it both more robust and meaningful. This response proposes that an outcome and associated indicators are added with respect to this and proposed wording for same are included for consideration.</p> <p>Housing Rights is acutely aware of the difficulties in the private rented sector which significantly contribute to homelessness. Our assessment of the current draft strategy however is that references to the private rented sector are muted. Housing Rights views it as appropriate for the flagship strategy to prevent homelessness to more overtly address the issue of the private rented sector. The challenges associated with the sector in terms of affordability, fitness, security etc. should more comprehensively be noted to reflect the private tenancies' unsuitability for people/ families who are homeless or people/ families whose housing circumstances make them vulnerable to homelessness.</p>	<p>Noted – The Housing Executive appreciates the consideration that has guided the response from Housing Rights including the work on indicators. The suggestion from Housing Rights will require more thought ahead of any inclusion in the Strategy and the Housing Executive will follow up with Housing Rights in order to explore this suggestion further.</p> <p>Accepted – The revised Homelessness Strategy 2022-27 will include a reference to the issues that have been raised in this response in terms of the difficulties that households may encounter in the private rented sector.</p>

	<p>Housing Rights welcomes the NIHE’s independent research project which evaluates the delivery of the Homelessness Strategy 2017-2022. However, Housing Rights believe the timing of the evaluation may present challenges to incorporating all learning into this current strategy.</p> <p>To ensure the contributions of all stakeholders are recognised, Housing Rights recommends that the distinct roles played by statutory and community and voluntary organisations are clearly defined, particularly with respect to the achievement of key objectives. This will ensure the role played by all stakeholders is appropriately maximised and avoid a scenario in which no-one feels responsible for certain objectives which leads to their not being progressed.</p> <p>If the strategy is to better promote collaborative working these issues should be addressed in the strategy. Not only will better awareness of and connections between services make better use of finite resources, it would also improve the experience of the people who use the services, as their needs could be met through a more straightforward process. To this end, Housing Rights would suggest creating a directory of services so that everyone can be clear of what services already exist, as a practical illustration of this collaboration and to assist in ensuring that people in need of support receive the most appropriate service as quickly as possible.</p>	<p>Noted - The Housing Executive would note that an interim report on the Evaluation of the Homelessness Strategy 2017-22 has been received prior to the publication of the Homelessness Strategy 2022-27. This will be published upon finalising of the project.</p> <p>Agreed – The annual action plans will include reference to the role played by key stakeholders.</p> <p>Agreed – The Housing Executive has published service directories which are available via this link.</p>
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	<p>Housing Rights commends the NIHE on its collaborative working throughout the pandemic, especially with the Department of Health and frontline voluntary bodies. This is evidence that collaborative working can deliver. However, Housing Rights is concerned that the relationships and cooperation that the pandemic inspired, may be lost in a post-pandemic setting. To support, facilitate and copper fasten the purpose of such collaboration, Housing Rights would suggest that an explicit duty is placed on stakeholders to cooperate. This would not only bring Northern Ireland into line with legislative developments elsewhere, it would ensure that the prevention and alleviation of homelessness remain a key priority for all relevant public bodies. Housing Rights would support legislative change and has therefore recommended to the Department for Communities that it should bring forward legislative reform to place a statutory duty to cooperate in the prevention and alleviation of homelessness on each of the statutory bodies named in s6A (5) of the Housing (Northern Ireland) Order 1988.</p> <p>Housing Rights would therefore suggest, that whilst lived experience is at the core of the strategy, in order to ensure appropriate focus and resources are directed towards it, it should be a key objective of the strategy. Indeed, it is our view that supporting people with lived experience of homelessness in the design and delivery of homelessness policy and services, should be added as the fourth objective of the strategy.</p>	<p>Noted – Any comments relating to legislative amendments will be forwarded to the Department for Communities for consideration.</p> <p>Not accepted – While the Housing Executive acknowledges the rationale for this suggestion this comment has been considered in the context of the overall consultation response. Many consultees noted agreement with the provision of three objectives.</p>
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	<p>Lived Experience</p> <p>To enhance stakeholders understanding of the approach to be taken by the NIHE in this work, Housing Rights suggests the strategy detail how the NIHE plans to engage with and work alongside those with lived experiences.</p> <p>Furthermore, the NIHE will be aware that Homeless Network Scotland are currently leading work with their Change Team and ‘All in for Change’ programme. The team is made up of individuals already working in the sector and individuals who have their own lived experience of being homeless. This combination of policy and practice allows for big issues to be viewed from multiple perspectives and it allows solutions to come from those with lived experience. Housing Rights commends the Change Team for their valuable work and believes this kind of model could be considered in this strategy.</p> <p>Housing Rights note the commitment on pg. 12 to develop a Homelessness Lived Experience programme aligned to the strategy. It may be of use to the NIHE to know that Housing Rights is preparing to commission research to better understand groups who are experiencing poor housing and homelessness in Northern Ireland and potential models of participation which may assist their involvement in decisions made about policy and services. The research is the first step in a programme of work which aims to test the application of such models and consider their applicability to improve housing and homelessness policy and services in</p>	<p>Agreed – further information on this will be provided upon the publication of annual action plans with the first action plan due for publication alongside the Homelessness Strategy 2022-27.</p> <p>Agreed – In developing the draft Homelessness Strategy 2022-27 the Housing Executive engaged with Homeless Network Scotland as part of our own considerations for involving those with lived experience. In developing our own lived experience programme the Housing Executive will continue to look for examples of best practice and adopt these accordingly.</p> <p>Noted – The Housing Executive will follow up with Housing Rights outside the consultation process on this particular point.</p>
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	<p>Northern Ireland. Housing Rights would be pleased to work with the NIHE in the development of the Homelessness Lived Experience programme.</p> <p>Housing Rights supports learning by reflection, and welcomes the NIHE's independent research project which evaluates the delivery of the Homelessness Strategy 2017-2022. However, Housing Rights believe the timing of the evaluation may present challenges to incorporating all learning into this current strategy. One area of concern is that responses to the draft strategy will not be informed by the valuable insights which the evaluation will produce. In practice, timing may also present a challenge for the NIHE to shape this strategy based on the insights offered in the evaluation of the previous strategy. It would be useful therefore, for consideration to be given to how the findings of the evaluation will be shared with those involved in the delivery of the strategy via the various groups (LAG, CHF, HSSG etc.) so that the learning of the evaluation can influence the approach to implementing the draft strategy. Additionally, Housing Rights would suggest that the timing of future evaluations is given adequate advance consideration, to avoid this situation arising again.</p> <p>It is Housing Rights view, therefore, that the development and adoption of a Housing Advice Quality Standard is imperative to quality assuring the Housing Solutions approach. That such a standard would also contribute to improving standards of housing advice provision delivered</p>	<p>Noted – The final version of the Homelessness Strategy 2022-27 will include a summary of key findings from the independent evaluation of the Homelessness Strategy 2017-22. Upon publication the evaluation will be distributed to all relevant stakeholders and available on the Housing Executive's website.</p> <p>Agreed – While the Housing Executive accepts the merits of a Housing Advice Quality Standard and accepts this as a suggested action it will not be possible to deliver this action in Year 1 and it will therefore be included in a subsequent action plan.</p>
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	<p>by all agencies involved in homelessness prevention work, adds further weight to the need for such a standard. Housing Rights recommends that the NIHE include a specific action in relation to this under Objective 1. "Housing Advice Quality Standard agreed and implemented for all relevant agencies across Northern Ireland."</p> <p>Housing Rights commends the on-going preventative work the Housing Solutions team carries out, however notes that no official evaluation or review has taken place and been published since this approach was adopted in 2018. In keeping with the evaluation of the previous strategy, Housing Rights would suggest the NIHE evaluate the delivery of the Housing Solutions team as this would ensure further learning is embedded in the approach to ending homelessness.</p> <p>The commitment on pg.38 to ensure arrangements are in place through which the NIHE will listen and respond to people with lived experience is welcomed by Housing Rights. However, the NIHE may wish to review why this explicit commitment is only made in Objective 2. As mentioned in 3.2, we believe that in order for this commitment to be realised, the correct level of resources and support need to be allocated to it, and so would suggest the commitment take greater prominence in the strategy.</p> <p>The term 'affordable', which is used in this strategy around housing supply, may be conflated with current proposals to</p>	<p>Noted – The Housing Executive would note that as part of the Homelessness Strategy 2017-22 the National Practitioner Support Service carried out a Peer Review of Belfast Housing Solutions. While it was intended to carry out a further review in other locations the pandemic has resulted in delays. It is expected that a further review will have commenced prior to March 2022.</p> <p>Agreed – The commitment to lived experience will underpin our approach to the Strategy as a whole and this commitment is reflected in the Homelessness Strategy 2022-27.</p> <p>Accepted – This distinction will be made in the revised Homelessness Strategy 2022-27.</p>
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	<p>increase supply of ‘affordable’ products, like Intermediate Rent and PRS leasing. Housing Rights would caution the use of similar terminology as there is explicit recognition within the current proposals that these products are unlikely to be suitable for households who are experiencing homelessness. Therefore, a clear distinction in the wording would be helpful to create distance between the strategy’s vision of ending homelessness through affordable homes, and the current proposals of affordable products to add to the housing supply.</p> <p>Housing Rights notes the reference on p.48 to expanding housing options across all tenures. It is unclear from the strategy if the intention is to e.g., do this by using private rented sector accommodation in the discharge of the statutory duty. As referenced above in 3.3.1 it is important that the difficulties with the private rented sector are explicitly recognised in this strategy.</p> <p>Outcomes – The response provided a number of suggestions in regards to outcomes.</p>	<p>Noted – Any discharge of the statutory duty to the private rented sector will be consistent with actions arising from the implementation of the Fundamental Review of Allocations.</p> <p>Noted – The Housing Executive appreciates the rationale behind the suggested outcomes/indicators. The Housing Executive has considered these suggestions in the context of all responses with the majority noting positive comments in relation to outcomes/indicators. The Housing Executive will follow up with Housing Rights in respect of the use of additional outcomes/indicators and subject to the outcome of these discussions will consider adding further outcomes/indicators at a later date.</p>
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<p>Individual Response</p>	<p>This response was one of a number which were not submitted on the consultation template provided and therefore no answers to the yes/no questions were received.</p> <p>The response provides a number of comments in relation to restructuring of the housing market and notes concerns in relation to the lack of affordable housing to buy and rent in the private sector. The response also the need to provide imaginative schemes to ensure appropriate shared use of existing properties and new developments.</p> <p>The responses provides a general comment on the provision of homes for migrants/asylum seekers/refugees.</p> <p>The responses refers to Irish Travellers and notes ‘We need to have a situation where such travellers are not harassed in a way that makes their chosen home insecure.’</p> <p>Any homeless policy will need to take account of forecast climate change. Our village is coastal and the forecast is that its seaward side houses will be subject to repeated flooding during the increasing number of strong storms within the next 20-30 years, with the road accessing the main street also repeatedly flooded. This is a situation replicated in</p>	<p>Noted - As noted earlier in this document the issue of housing supply will be brought to the Department for Communities for consideration, particularly in context of alignment with the Housing Supply Strategy.</p> <p>Noted - Destitution of refugees and asylum seekers is an issue 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 Homelessness Strategy 2022-22.</p> <p>Noted – The Housing Executive will consider how the Homelessness Strategy 2022-27 can align with the Irish Traveller Accommodation Strategy 2020-25.</p> <p>Noted – The impact of issues such as climate change will be considered in the review of our projected needs which will be carried out on an annual basis over the duration of the Homelessness Strategy 2022-27.</p>
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	many locations, with consequences of people becoming homeless and loss of housing stock.	
MACS	<p>Yes/No responses supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>It is vital that there is real effort and collaborative approach to providing support at the early stages when homelessness is a risk factor. Agreed – The Housing Executive is committed within the draft Homelessness Strategy 2022 - 27 to a collaborative approach, taking account of the service user expertise in service development.</p> <p>Developing Actions: there needs to be more focus on the Covid -19 recovery/reset plan as the restrictions reduce.</p> <p>Consideration needs to be given secondary prevention models to provide core funding for those pilots that have proven to be successful.</p> <p>Consideration need to be given to how services are funded in regards to equity in pay across the voluntary sector and against statutory services as staff retention is a significant issues within the community and voluntary sector.</p> <p>Detail required on the intervention and accommodation that will be available for those at highest risk specifically showing the different models available and the plan moving forward to ensure the one fits all and not based on need is</p>	<p>Agreed – The Housing Executive is committed within the draft Homelessness Strategy 2022 - 27 to a collaborative approach, taking account of the service user expertise in service development.</p> <p>Agreed – The Year 1 Action Plan includes a commitment to develop an addendum to our COVID-19 Reset Plan.</p> <p>Agreed – The Housing Executive is committed to the development of successful prevention intervention models subject to funding.</p> <p>Agreed – The Year 1 Action Plan includes a commitment to consider and review the findings from a project on challenges facing sector in terms of retention & recruitment of staff.</p> <p>Noted – The Housing Executive agrees and the person centred approach outlined in the strategy is designed to ensure that housing and support solutions are tailored to meet the individual</p>

	<p>not a reoccurring feature in how accommodation is provided and services delivered.</p> <p>Further detail required how housing supply will be addressed and on key supports/enablers that will be introduced or secured as part of the year one action plan to support customers moving into settled accommodation specifically how via this strategy in year one they will be supported and integrated into the community and how support will continue to be provided until the end of their homeless journey.</p> <p>Interdepartmental approach: working across both statutory and voluntary agencies to ensure successful delivery of strategy and ensuring there is an interdepartmental approach and delivery of the strategy. Funding: prioritising and targeting funding to where it will make the best impact and the creation of joint funded projects.</p> <p>Further detail is required in the action plans in regards to how the aims/objectives will be achieved as the Strategy at times lacks this detail.</p>	<p>needs. The development of the annual action plan will detail specific actions related to housing options going forward.</p> <p>Noted – The Housing Executive will publish all Annual Actions Plans which will set out what specific actions are to be taken to address issues raised.</p> <p>Noted – As per the Homelessness Strategy 2017-22 the Homelessness Strategy 2022-27 will be supported by an Inter-departmental Homelessness Action Plan which will be developed by the Department for Communities and involve actions on behalf of other departments.</p> <p>Noted – The Housing Executive has published a Year 1 Action Plan alongside the Homelessness Strategy 2022-27.</p>
NIACRO	<p>Yes/No responses generally supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>While NIACRO agrees with the vision, we suggest the Housing Executive should consider further who its partners will be and list the organisations involved in ‘Ending</p>	<p>Noted – The Housing Executive has provided an overview of the types of organisation involved in the delivery of the draft Homelessness Strategy 2022-27 as per page 23.</p>

	<p>Homelessness Together’. The vision seems vague and overly idealistic when it is not accompanied by a clear setting out of who is involved and who has agreed to participate in achieving this vision.</p> <p>NIACRO suggests that the first half of this sentence would be enough of an aim. The terms ‘rare’ and ‘brief’ are subjective and the second half seems like a caveat to the first statement.</p> <p>We would like to see ‘Accountability’, ‘Transparency’, ‘Equity’ and ‘Non-judgemental’ added to this list of principles to support this person centred focus, as it is not currently clear why some people receive a better service / greater benefit from the Housing Executive than others.</p> <p>We are apprehensive about how the Housing Executive’s service can be ‘person centred’ when there has been talk of the removal of areas of choice and the number of refusals allowed reduced.</p> <p>Regarding the principle ‘Expert Led’: NIACRO would like to see more research done specifically about homelessness in a Northern Ireland context, and welcome the research conducted by Fiona Boyle Associates and that this research has fed into the development of this Strategy, and the acknowledgement that “it is essential that the actions set out within this strategy are subject to continual review based on ongoing analysis of data and trends.”</p>	<p>Not accepted – The second half of the aim recognises that while prevention will be our main objective there will be occasions that, despite the best efforts of a range of organisations, homelessness will occur.</p> <p>Noted – These are reflected in the Housing Executive’s core values which are ‘We are committed to making a difference through fairness, passion and expertise.’ The Homelessness Strategy 2022-27 will include a reference to our core values when referencing person centred.</p> <p>Noted- The Housing Executive would note that these proposals were part of the Fundamental Review of Allocations which was subject to a public consultation by the Department for Communities.</p> <p>Noted – The Housing Executive will work with our Research Unit in commissioning independent research over the course of the Homelessness Strategy 2022-27.</p>
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	<p>Evidence based’ should allow for a critical analysis of previous strategies. When looking, for example, at the last two 5 year strategies, the aims have largely remained the same, in particular around homelessness prevention. The evaluation of these strategies needs to take an inward look at what has not gone well in particular the models of practice. It is also a concern that there is no evaluation available on the previous 5 year strategy while responding to this one.</p> <p>A high percentage of people who are awarded FDA have had or currently have a tenancy that with support could have been sustained. The role of floating support is key at this prevention stage however the first reference to the importance and use of floating support in this strategy is at objective 3.</p> <p>The first objective in the aim to prevent homelessness should be to sustain tenancies. This would mean offering interventions and services to people prior to when people currently come to the Housing Executive.</p> <p>There is also a need to improve the awareness of floating support and homelessness prevention service to the PRS. In the strategy in 12-17 it stated ‘Develop a referral</p>	<p>Noted – The Housing Executive would note that the aims for both of the last two strategies have been developed in partnership with the homelessness sector and the aims/objectives are reflective of the views our key stakeholders and supported by the percentages in agreement as noted earlier in this document. The Housing Executive would note that an interim report on the Evaluation of the Homelessness Strategy 2017-22 has been received prior to the publication of the Homelessness Strategy 2022-27. This will be published upon finalising of the project.</p> <p>Noted – The Housing Executive recognises the importance of floating support as being key in homelessness prevention. Due to wide range of support that can be of assistance specific types of support are generally not mentioned in Objective 1 but floating support would be included when the Housing Executive notes ‘Our ambition is to prioritise homelessness prevention through the provision of the right support at the right time with an aim to prevent homelessness from happening in the first place’ as per page 26 of the draft Homelessness Strategy 2022-27.</p> <p>Agreed – The Housing Executive agrees with this as evidenced with the provision of the Homelessness Prevention Fund.</p> <p>Noted – Further details on this action can be found on page 40 of the evaluation of the Homelessness Strategy 2012-17 which can be found on this link.</p>
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	<p>mechanism to enable the provision of floating support services to vulnerable individuals in the private rented sector, to be in place by 2013/14.’ Either this has still not happened or there is huge lack of awareness that this is in place.</p> <p>We also would like the Housing Executive to be more specific on what they mean by “improve housing options”.</p> <p>NIACRO is concerned about the ‘community integration’ element as it is very client centred. Based on our experience, some work will need to be done with the communities which the client is integrating into, as we have seen occasions in which the client is excluded from certain areas by the community themselves. Some mediation work may be necessary in these instances.</p> <p>We would ask to be considered an additional enabler of ‘Policies’ be included alongside ‘Legislation’. Many policies both with housing and interdepartmentally have had a debilitating effect on how to support people who are homeless, such as policies around intentionality. There are also some concerns that future policies that have been muted could equally have such an effect for example changing Housing allocation policies. Any policies should have a test on how they may impact on a person’s homelessness journey.</p>	<p>Accepted – The Homelessness Strategy 2022-27 will provide a comment to clarify any reference to ‘improve housing options’.</p> <p>Accepted – The Housing Executive recognises that community integration will involve working with the client and community and this work will be included in the annual action plans.</p> <p>Not accepted – The draft Homelessness Strategy 2022-27 notes ‘We will review our policies to ensure we are meeting the needs of our customers’ as part of the experiential evidence enabler.</p>
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	<p>Quarterly Reports should be made available externally for full transparency, with actions taken that quarter detailed.</p>	<p>Not accepted – In the context of overall responses on the Strategy there is general support for the current reporting on an annual basis.</p>
<p>Northern Ireland Federation of Housing Association (NIFHA)</p>	<p>Yes/No responses generally supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>The input of the Health & Social Care sector will be crucial in bringing together this Strategy, particularly for jointly commissioned services. Housing associations would welcome more details as to how various Departments /partners are accountable for contributing to ending homelessness as set out in the Strategy?</p> <p>More detail would be welcome regarding how those vulnerable to homelessness are identified and engaged with in a way that enables preventative work to be done. Front line staff are critical to this and a focus on staff training across frontline contact points would support this key work.</p> <p>With regard to ‘Evidence Based’ to help inform decision making - there are acknowledged barriers that prevent vulnerable individuals acquiring essential evidence, for example; GP’s can charge for medical evidence, and some may not provide letters in support of applications.</p> <p>Young people (who are acknowledged in the Strategy as particularly vulnerable to homelessness) are often living in unsafe family environments and may not have engaged with support services and would struggle to provide evidence of</p>	<p>Noted – As per the Homelessness Strategy 2017-22 the Homelessness Strategy 2022-27 will be supported by an Inter-departmental Homelessness Action Plan which will be developed by the Department for Communities and involve actions on behalf of other departments, including Health.</p> <p>Noted – The annual action plans will provide further information on work around prevention. The Housing Executive acknowledges the importance of front line staff and our use of staff as an enabler reflects the importance of training to support staff in delivering the objectives of the Homelessness Strategy 2022-27.</p> <p>Noted – The Housing Executive would note this refers to implementation of policy. This would not be the Housing Executive’s approach to acquire information from a perpetrator in cases where there is fear of violence/abuse, there is a protocol in place with Social Services to address relevant concerns/issues. Staff are also trained in Safeguarding procedures regarding vulnerable persons.</p>

	<p>their predicament. They may be living with family/parents in fear of violence/abuse, yet it is the family/parents who are asked to provide evidence that the young person is at risk. In such circumstance efforts should be made by staff to seek other corroboration or information to support the young person's application. Furthermore, it should be clear in decisions what weight was given to evidence and efforts made to address lack of evidence.</p> <p>Housing associations feel that this will require adequate resources around the supply of housing, effective partnership working and tailored wrap around support from the initial assessment through to re-housing process, especially in the first crucial weeks of a new tenancy.</p> <p>Whilst the Strategy has acknowledged that services in rural areas are required, as are services for young people, the Strategy does not address how / whether adequate resourcing will be in place to provide necessary preventative interventions.</p> <p>However, resettlement must be at a time when the individual is ready, or the individual is provided with the appropriate support in their settled accommodation until it is clear they have the skills to sustain their home. Due to the complexity of some individual's needs, some may require more than the current 2 years allowed with support services. Therefore, flexibility should be permitted in some cases for continued support to ensure that individual is</p>	<p>Noted – The Housing Executive has provided a general comment in response to all comments on funding in the introduction of this document.</p> <p>Noted – The Housing Executive has provided a general comment in response to all comments on funding in the introduction of this document.</p> <p>Noted – The issue of a maximum 2 years of support provision will be referred to Supporting People for consideration.</p>
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	<p>equipped to sustain settled accommodation. By waiting until the Service User is ready, we can improve tenancy sustainment opportunities and reduce a return to homelessness. Alternatively, an appropriate support package needs to be provided to the individual in their permanent home to maximise opportunities for sustainment.</p> <p>The Action Plan one year at a time may present challenges. One year is a tight timeline within which to review progress against targets particularly in an area as complex as homelessness and homelessness services. Consideration for a 2 Year Action may allow for adequate reflection, assessment, and forward planning to the next year.</p> <p>Key to success of the Strategy will be the commitment and accountability of Departmental partners such as Health and Criminal Justice. Homelessness is certainly not simply a housing issue. Accountability for partners must be tangible and discernible otherwise the Strategy may not receive the required input.</p>	<p>Noted – The Housing Executive acknowledges the comments in respect of a suggested 2 year action plan and would note that should there be delays in the delivery of actions it is our intention that they would be brought forward to the subsequent action plan.</p> <p>Noted – As per the Homelessness Strategy 2017-22 the Homelessness Strategy 2022-27 will be supported by an Inter-departmental Homelessness Action Plan which will be developed by the Department for Communities and involve actions on behalf of other departments, including Health.</p>
<p>NILGA (Northern Ireland Local Government Association)</p>	<p>Yes/No responses supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>NILGA is supportive of the vision, and would be keen to see strategic involvement of local government in helping steer the implementation of the strategy, given the council responsibility for development planning.</p>	<p>Noted - The Housing Executive notes this comment and is keen to work with NILGA in the implementation of the Strategy given the close links between respective stakeholders and the role we have in addressing homelessness.</p>

	<p>Principles</p> <p>In terms of A and C – it is also important to consider when/where families of customers are engaged with (where appropriate) both in terms of prevention (e.g. trying to prevent or intervene early where relationship breakdowns lead to homelessness) and in terms of securing and maintaining tenancies, the ability to provide support and link into/work alongside support services. Services such as restorative social service/family therapy practice may prove beneficial in this area.</p> <p>NILGA would suggest strengthening this section by including local government on the Implementation Plan group and the local action groups.</p> <p>NILGA is of the view that the ‘Everyone In’ policy which was adopted through the COVID- 19 pandemic should be researched more and developed to see if it could work in the long term. As Belfast City Council has stated, there is a need to take into consideration the needs of people that have no recourse to public funds and do not have the wider support mechanisms that other categories of people might have i.e. through friends and family that they can draw on. People with no recourse to public funds are very often prohibited from accessing homeless shelters that rely on public funds.</p>	<p>Noted – The Housing Executive acknowledges the role of families of customers in terms of prevention and in terms of securing and maintaining tenancies.</p> <p>Accepted – The Housing Executive will engage with NILGA with a view to exploring representation on implementation groups, where appropriate.</p> <p>Noted – While this comment is noted it should be recognised that any long-term provision is reliant on a change of legislation at Westminster.</p>
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	<p>NILGA is aware that some people wishing to help and who have organised to work with homeless people, have no relevant qualifications, and are working in an unregulated way. More controls are needed on who can work with those most vulnerable in society. Whilst it is 'out of the goodness of people's hearts' that they wish to help, NILGA is of the view that some interventions establish an element of enablement, blind to the support NIHE and established homelessness organisations provide.</p> <p>Re: Objective 3 Community integration may need some education and a communications campaign to increase awareness in the local areas about the facts of homeless etc.</p>	<p>Noted – The Housing Executive acknowledges this comment and the Year 1 Action Plan includes a commitment to carry out research on this issue in order to inform any advantages/disadvantages that such provision of assistance may provide.</p> <p>Agreed – This point is reflected in the Year 1 Action Plan which commits to a public awareness campaign around homelessness.</p>
Northern Ireland Youth Forum (NIYF)	<p>Yes/No responses generally supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>Vision: Welcome of concise strategy, flexibility of annual plans, focus on prevention, focus on partnership working and necessary funding, greater involvement of service users and the consideration of wider impacts of Covid-19.</p> <p>Objective One: Young people have said – remove the stigma, raise awareness and education, right information at the right time can help prevent homelessness.</p>	<p>Agreed – The Homelessness Strategy 2022-27 acknowledges these points as noted throughout the strategy.</p> <p>Agreed – The Homelessness Strategy 2022-27 is committed to improving awareness and education and to ensuring advice and guidance is available to all at point of need.</p>

	<p>Lack of support services.</p> <p>Primary Prevention: Narrative about cross departmental focus yet the evidence is that there is a lack of cross departmental working. Do we need to reference the programme for Government? Raising awareness of homelessness is something that young people have spoken about yet there is little take up from stakeholders such as DE/EA/CCEA.</p> <p>Secondary Prevention: Proposal to extend the prevention fund – strongly agree.</p> <p>Tertiary Prevention: agree Specific challenges for young people: Lack of support, uncertainty and being unable to make decisions, independent living skills, budgeting and financial barriers, loneliness, isolation and no one to talk to, alcohol and drug dependency, mental ill health.</p> <p>Objective Two: Agree Young people have said repeatedly “do not put us in hostels with older people”. Understanding the needs of customers should reflect this ensuring that temporary accommodation services for young people are safe, appropriate and provide adequate support.</p>	<p>Noted – The Homelessness Strategy 2022-27 is committed to improving access to services and using an evidence based approach to service development.</p> <p>Noted – The Homelessness Strategy 2022-27 is committed to delivering an inter-departmental approach. The Housing Executive will seek to build upon the work of the Inter-departmental Homelessness Action Plan in the delivery of the Strategy.</p> <p>Agreed – The Housing Executive is committed to the provision of the Homelessness Prevention Fund, subject to available funding.</p> <p>Noted – The Housing Executive recognises that individual groups will have unique experiences. The person centred approach and commitment to service user input to the development of appropriate services are identified within the Strategy as mechanisms to ensure that the right support services are in place going forward.</p> <p>Noted - The person centred approach and commitment to service user input to the development of appropriate services are identified within the Strategy as mechanisms to ensure that the right support services are in place going forward.</p>
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	<p>Objective Three: agree.</p> <p>Youth Forum outlines a range of key messages from young people in relation to housing options which will be considered in the development of year one action plan and subsequent actions.</p> <p>Enablers: Agree – all enablers should be prioritised.</p> <p>Additional comment: Youth homelessness should be addressed outside of a generic strategy and action plan</p> <p>Monitoring: Mechanisms should be established to ensure effective and meaningful stakeholder engagement. This should include a vehicle for young people who have lived experience of homelessness to be part of this process. Those with lived experience should be included on the Homelessness Strategy Steering Group following a programme of personal development and capacity building.</p>	<p>Noted – The Housing Executive remains committed to working in partnership with the NIYF to develop appropriate housing based responses to the needs of young people.</p> <p>Noted - While the Homelessness Strategy 2022-27 covers all persons vulnerable to homelessness, within that, specific partnerships are developed to address a range of sub groups including young people.</p> <p>Noted – The Homelessness Strategy 2022-27 is committed to stakeholder input from those with lived experience of homelessness and will ensure the creation of appropriate mechanisms.</p>
PBNI	<p>Yes/No responses supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>PBNI welcomes the NIHE’s draft Homelessness Strategy and agrees with the aspirational vision of ‘Ending Homelessness Together’. PBNI welcomes the commitment to focus on adults with criminal convictions as a high risk group. There</p>	<p>Noted – The Housing Executive notes this comment and is keen to work with PBNI in supporting this client group in addressing challenges in respect of homelessness, a number of which are cited throughout the response.</p>

	<p>is a direct link between homelessness and offending behaviour.</p> <p>Whilst it is important to continue to deliver effective services that are already in place e.g. Housing Solutions, Housing First, it is also important to bench mark with other jurisdictions and to develop innovative approaches, such as the Complex Lives Approach.</p> <p>PBNI asks that consideration is given to amending the current protocol to enable the process of identifying emergency, temporary accommodation for prisoners identified as FDA in advance of their release from prison, so that the service user and professionals involved are aware of the address to which they are being released.</p> <p>‘There needs to an awareness raising programme and a cross departmental focus on homelessness’.</p> <p>There is a need for the NIHE to be more proactive in identifying temporary accommodation and to engage in long term, strategic partnerships with private landlords. Many landlords have reported that they are unaware of the services that are available to support individuals to sustain their tenancies. This needs to be addressed.</p>	<p>Agreed – The Housing Executive, where appropriate, will benchmark with other jurisdictions and this includes the development of initiatives such as the Complex Lives approach as outlined in the draft Homelessness Strategy 2022-27.</p> <p>Noted – While the Housing Executive recognises the difficulties for such applicants we are also mindful of our statutory duty to provide temporary accommodation to all those who are Full Duty Applicants or to whom we owe an interim duty. For all applicants, regardless of client group, temporary accommodation placements are provided dependent on availability on the day of presentation. The Housing Executive would note ongoing work with relevant stakeholders in updating a Housing Advice In Prisons Protocol.</p> <p>Accepted – An awareness raising programme will form part of our Year 1 Action Plan.</p> <p>Agreed – These points are already subject to consideration in both the Homelessness Strategy 2022-27 and Strategic Action Plan for Temporary Accommodation.</p>
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	<p>In context of enablers the response notes ‘The development of outcome focused processes should be prioritised. Also, making it as easy as possible for those experiencing homelessness to interact with the NIHE.’</p> <p>Consideration should be given to how to deliver a service to those who are deemed to be ‘deliberately homeless’. The individuals PBNi works with often have significant vulnerabilities and have become involved in offending behaviour as a result of the trauma they have experienced. The NIHE has, like other public sector organisations, developed a trauma informed approach to their work. Going forward there is a need to move from a trauma informed perspective to being more trauma responsive i.e. embedding trauma awareness into policies and practice and organisational culture.</p> <p>An ‘easy read’ version of the strategy should be made available.</p>	<p>Agreed – The Housing Executive would note this as being included in enablers and Objective 1.</p> <p>Accepted – The Housing Executive has a duty to provide homeless applicants with advice and assistance under The Housing (Northern Ireland) Order 1988. Additionally, the Housing Executive will consider how the development and implementation of annual action plans can consider the embedding of trauma awareness into policies and practice and organisational culture. This response was one of a number which referred to the need to consider Trauma Informed Practice.</p> <p>Accepted – The Housing Executive will publish our Annual Actions Plans as ‘easy read’ versions’.</p>
PPR (Participation and the Practice of Rights)	<p>This response was one of a number which were not submitted on the consultation template provided and therefore no answers to the yes/no questions were received.</p> <p>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.</p>	<p>Noted - As referenced earlier in this document the issue of housing supply will be brought to the Department for Communities for consideration, particularly in context of alignment with the Housing Supply Strategy.</p>

	<p>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.</p> <p>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</p>	<p>Noted - The issue of 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 Homelessness Strategy 2022-27.</p> <p>Noted - Destitution of refugees and asylum seekers is an issue 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 Homelessness Strategy 2022-22.</p>
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	<p>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.</p>	
<p>Red Cross NI</p>	<p>This response was one of a number which were not submitted on the consultation template provided and therefore no answers to the yes/no questions were received.</p> <p>General Support for the aim of the Strategy.</p> <p>Recommendation One: Refugees and people seeking asylum are identified as a group vulnerable to homelessness within the Homelessness Strategy.</p> <p>Recommendation Two: Ensure the risk of homelessness faced by refugees and people seeking asylum at each stage</p>	<p>Noted - A main driver of the Homelessness Strategy 2022-27 is the person centred approach. While we do not specifically name all groups that may be vulnerable to homelessness, nevertheless the specific circumstances of all clients are taken into consideration in a homelessness assessment with the aim of delivering a housing and support package tailored to their needs. It should be noted that Asylum Seekers do not fall under the remit of the Homelessness Strategy but are processed through the Home Office. They engage with Homelessness Services once refugee status has been awarded.</p> <p>Noted – The NIHE recognises the specific circumstances of refugees.</p>

	<p>of the asylum process are mitigated through targeted actions within the Homelessness Strategy.</p> <p>Recommendation Three: The Homelessness Strategy contain a measure to advocate for the Memorandum of Understanding or similar accommodation support for destitute migrants to be in place after the Covid-19 Pandemic ends.</p> <p>Recommendation Four: Provide for the MOU to be evaluated to inform best practice in supporting homeless refugees and people seeking asylum.</p> <p>Recommendation Five: Ensure risk of homelessness faced by reunited refugee families are mitigated in the Homelessness Strategy, through the provision of suitable housing prior to family members arriving in NI.</p> <p>Recommendation Six: Ensure sponsors of reunited refugee families are provided accessible support and advice on housing prior to their family's arrival in NI.</p>	<p>Noted – The Year 1 Action Plan contains an action to consider support available upon the conclusion of the Memorandum of Understanding.</p> <p>Noted – The Housing Executive has committed within the Reset Plan to review all best practice during the pandemic with a view to mainstreaming activity where possible. It should be noted that support to people seeking asylum is reliant on legislative change which is beyond the remit of the Housing Executive.</p> <p>Noted - While the Housing Executive recognises the difficulties for such applicants we are also mindful of our statutory duty to provide temporary accommodation to all those who are Full Duty Applicants or to whom we owe an interim duty. For all applicants, regardless of client group, temporary accommodation placements are provided dependent on availability on the day of presentation. In terms of permanent housing, NIHE is subject to legislative process as outlined under the Housing Selection Scheme.</p> <p>Noted – The Housing Executive will continue to work with a range of support and advice agencies to ensure high quality advice and guidance is available in accessible forms to all clients.</p>
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<p>RSUN (Regional Service User Network)</p>	<p>This response was one of a number which were not submitted on the consultation template provided and therefore no answers to the yes/no questions were received.</p> <p>Participants expressed concern about the lack of detail included in the HS and SAPTA on how service users will be engaged and how such participation will be funded.</p> <p>There were a range of comments around any engagement with service users as needing to be meaningful and not a 'box-ticking' exercise. Additionally, views noted that 'The development of service user involvement and the 'Homelessness Lived Experience programme' must be co-designed and co-produced with service users for it to achieve any real change.'</p> <p>Participants agreed that homelessness prevention should be an objective in the HS. However, participants outlined that they believed the other two objectives in the HS should be prioritised over this objective within the strategy.</p>	<p>Noted – The Strategy contains a commitment to deliver a lived experience programme and acknowledges the need for further detail which will be provided in the development of Annual Action Plans. The wider issue of funding is outlined earlier in this consultation response with the funding overview in the Strategy having been amended following the consultation process.</p> <p>Accepted – The Housing Executive fully accepts all comments of this nature and the need for these comments to be addressed if engagement with those who have lived experience is to be an integral part of the Strategy, with the Housing Executive committed to achieving this.</p> <p>Noted – The Housing Executive acknowledges this comment in the context of overall agreement percentages as per the quantitative analysis in the introduction of this document. Given the overall levels of support no changes have been made to Objective 1.</p>

	<p>It was pointed out that preventing homelessness can in practice be difficult. While the Housing Executive has a role to play, it was stressed that they cannot achieve this on their own.</p> <p>It was noted that preventing experiences of repeat homelessness should be an important aspect of this objective.</p> <p>Participants noted that homelessness prevention measures targeted at preventing children leaving care from experiencing homelessness would be worthwhile.</p> <p>A number of participants stated that they felt that education has a valuable role to play in homelessness prevention efforts. One participant with lived experience of homelessness pointed to a positive example from their own life of a school's talk given by individuals who previously been homeless. The value of learning what being homeless is like and what to do if you are at risk of becoming homeless was stressed.</p> <p>It was made clear that the language of 'exiting' homelessness can fail to recognise what the experience of leaving homelessness is like. The language used gives the impression that once a person is housed that everything in their lives is now sorted out. The truth is that for those leaving homelessness, especially chronic homelessness, is</p>	<p>Accepted – The Housing Executive agrees with this point and this played a key factor in the use of the vision of 'Ending Homelessness Together'.</p> <p>Accepted – The Housing Executive agrees with this point.</p> <p>Accepted – The Housing Executive agrees with this point and will consider how this can be addressed in the development and implementation of our Annual Action Plans over the course of the Strategy.</p> <p>Noted – This will be raised directly with the Department for Communities for consideration in future iterations of the Inter-departmental Homelessness Action Plan.</p> <p>Not Accepted – While the Housing Executive acknowledges and has considered this comment the Homelessness Strategy 2022-27 outlines the support that this Strategy intends to facilitate as households transition to settled accommodation.</p>
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	<p>that it can be a very difficult and challenging journey. There was a perception that once you had ‘exited’ that was the box ticked for services who in some cases then felt they could move on.</p> <p>It was noted that service users have a valuable role to play in the development of support services. Ideas for support and new services in this area should be tested with services users.</p>	<p>Agreed – The Homelessness Strategy 2022-27 recognises the merits of this point, as evidenced by our principles which will underpin our approach to both the development and delivery of homelessness services. Both person centred and expert led are principals which fully recognises the importance of service users and those with lived experience.</p>
Shelter NI	<p>Yes/No responses supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>‘Together’ it should be made clear that the intention is to ensure all public and private agencies, communities, service providers, staff, funders, the general public and any other stakeholders are included.</p> <p>The Homeless Prevention Fund may allow the NIHE to stretch its reach into areas beyond its bailiwick. However, the real solution is to ensure that all statutory agencies are mandated to prevent and deliver the vision of this homelessness strategy through a legislative duty.</p> <p>Community Planning aims to improve the connection between all the tiers of Government and wider society</p>	<p>Agreed – The Homelessness Strategy 2022-27 recognises the wide range of stakeholders who have a role to play in delivering the vision of ‘Ending Homelessness Together’.</p> <p>Noted – The Housing Executive has noted a comment in relation to legislation in the introduction of this document.</p> <p>Noted – As per comments from several other consultees the Housing Executive is keen to engage with Community Planning</p>

	<p>through partnership working to jointly deliver better outcomes for everyone. There should be stronger links made through Community Planning Partnerships and outcomes made explicit in the Community Plan.</p> <p>Find a way of addressing the needs of homeless who are classified as people without recourse to public funds or develop a new Memorandum of Understanding to address these needs.</p> <p>In the interests of transparency, the action plan and delivery targets/ outcomes should be published every year in an annual report.</p>	<p>Partnerships in the delivery of the Homelessness Strategy 2022-27.</p> <p>Noted – The Year 1 Action Plan noted that ‘We will explore opportunities and options by which we can assist those with No Recourse to Public Funds upon the conclusion of arrangements linked to the Memorandum of Understanding’.</p> <p>Agreed – The Year 1 Action Plan is published alongside the Homelessness Strategy 2022-27 and in future, will be published with the annual report which will provide updates on indicators as outlined in the strategy.</p>
Simon Community NI	<p>This response was one of a number which were not submitted on the consultation template provided and therefore no answers to the yes/no questions were received.</p> <p>The Ending Homelessness Together document states: ‘This document reflects a genuine commitment to collaborate in its design and delivery. While the Housing (NI) Order 1988 identifies the Housing Executive as the organisation responsible for addressing homelessness in NI, we can only achieve this goal by harnessing support and working in partnership with a wide range of organisation both within and beyond the homelessness sector’ (page 2 para 2). Simon Community NI welcomes this statement and encourages the</p>	<p>Agreed – The Housing Executive is committed to a collaborative approach when delivering the Homelessness Strategy 2022-27 and looks forward to working with Simon Community and all other providers from across the sector in delivering the vision of ‘Ending Homelessness Together</p>

	<p>Housing Executive to embrace partnership working in its real and true form i.e. a relationship of collaboration, trust, mutual support, openness and flexibility.</p> <p>Aspects for further clarification</p> <p>The document states ‘this strategy seeks to build on the success and delivery of the previous strategy’ (page 2, para 4). It is unclear what rationale the Housing 2 Executive has for stating that the previous strategy has been successful given that a. the evaluation of the previous strategy has not yet taken place; and b. homelessness is on the increase.</p> <p>The Ladder of Participation (page 13) states that co-production and co-design will be done ‘in an equal and reciprocal partnership’. Clearer examples or intentions of how the Housing Executive intends to ensure an equal and reciprocal partnership would be not only be welcomed but necessary.</p> <p>Page 19 references the draft Housing Supply Strategy. It would be important for some description of how the Housing Executive sees the Ending Homelessness Strategy aligning with the Housing Supply Strategy and how the Homelessness Strategy will bridge the gap in increasing service demand whilst housing supply is ramping up.</p>	<p>Noted - Some aspects of the existing strategy have already been widely regarded as successful for example, prevention fund and associated outcomes, the existing collaboration built up through delivery which led to a prompt and effective pandemic response. An evaluation of the existing strategy is ongoing and will be made available upon completion which will determine the overall success or otherwise of the Strategy.</p> <p>Noted – The Housing Executive will provide further clarification in the provision of actions plans which we will develop with groups such as the Central Homelessness Forum. The Housing Executive will be seeking the input and collaboration on an ongoing basis of our partners and service users to ensure that our goal is achieved.</p> <p>Noted – The Housing Executive and Department for Communities have been working to establish alignment between both strategies. Relevant homelessness data and information has been provided which has directly fed in to the development of the Housing Supply Strategy. The Housing Executive is also responsible for the assessment of Housing Need and the delivery of all data related to housing development. Department for Community chairs the Homelessness Strategy Steering Group and</p>
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	<p>Page 19 also references the Interdepartmental Homelessness Action Plan. Given past experience, any future Interdepartmental Plan needs to be: strengthened in terms of representation; be properly resourced; and be outcome focussed. We believe that, to work effectively, this should be underpinned by a legislative requirement to collaborate.</p> <p>In addition to this, the Ending Homelessness Together strategy references the ‘need to ensure that the priorities of this strategy align with the Supporting People Three Year Strategic Plan.’ Unfortunately, as yet, we have not sight of this plan meaning it is difficult to ascertain how the Ending Homelessness Together Strategy and the Supporting People Strategy will connect.</p> <p>This document is silent on targets and outcomes. We believe that any strategic plan should set out what it hopes to achieve and include key KPIs by which we will judge a success or otherwise.</p> <p>Much of the plan will rely on significant financial investment and additional housing supply. What happens if either/neither comes to fruition?</p>	<p>sit on the Central Homelessness Forum and have been involved in the development of the Homelessness Strategy 2022-27.</p> <p>Noted - The Strategy commits to working with partners across the sector to guide the development of legislation as necessary to ensure the best outcomes for clients.</p> <p>Noted - The SP Three year Strategic Plan is now open for consultation and is available on this link.</p> <p>Not accepted - The Draft Homelessness Strategy 2022-27 is an outcomes based document. Page 53 outlines the outcomes and associated indicators for success.</p> <p>Noted – The Housing Executive has provided a general comment in response to all comments on funding in the introduction of this document.</p>
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	<p>The appendices provide homelessness data that we believe is incorrect e.g. Table 9 – ‘Accommodation Not Reasonable’ drops from 719 to 0 in three years; Table 11 – 3 ‘Accommodation Not Reasonable’ drops from 269 to 0 in one year and remains at that level. This appears to be at odds with the general escalation of ‘accommodation not reasonable’ as being a major to homelessness.</p> <p>Recommendations: Definition</p> <p>The document throughout refers to homeless ‘households’ rather than people. We believe that there needs to be recognition of the numbers of ‘people’ who are experiencing homelessness to give a better and more accurate sense of the scale of the homelessness problem.</p> <p>A definition of ‘hidden’ homelessness should be agreed by statutory and community/voluntary agencies in Northern Ireland.</p> <p>We still do not have an agreed definition of ‘homelessness prevention.’ Agreeing this was part of the last strategy but never finalised. It would be helpful if this could be carried forward and completed ASAP.</p>	<p>Noted - A disaggregation of ANR data was introduced to provide a more detailed understanding of why accommodation was unreasonable for clients with a move away from the use of the generic term. A zero beside the generic term references that it is no longer in use but ANR figures are the total of the disaggregated reasons. A relevant caveat will be included.</p> <p>Noted – The Housing Executive currently produces data in formats which are designed to assist in the delivery of duties. We utilise household data as it is more useful for us to group together those people who wish to live together as one household from singles to large families as this is more indicative for us of the need for size and type of both temporary and long term accommodation. However we do also publish data sets which further breakdown the household types.</p> <p>Noted – The Housing Executive will consider this suggestion as part of our work with the Central Homelessness Forum in implementing the Homelessness Strategy 2022-27..</p> <p>Noted - Work on this is still ongoing within the current strategy with the Central Homelessness Forum to be consulted on proposed definition.</p>
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	<p>Service and supply:</p> <p>The honesty of the projected needs section on page 15 is both welcoming and stark. It speaks to a need for more tailored and bespoke support and an increase in the provision of temporary and emergency beds. It would be helpful if the strategy outlined how these needs will be met and these services provided.</p> <p>There is a clear need for a rebalancing of housing provision in Northern Ireland with a much stronger focus on publicly-owned housing. The focus on social housing in the draft Housing Supply Strategy is to be welcomed but should include the end of 4 the mandatory sale of Housing Executive properties which would bring Northern Ireland into line with other devolved jurisdictions. In addition, we feel that to role of the charitable sector is unrecognised and undervalued.</p> <p>Legislation and Statutory Duty:</p> <p>We believe that we need new and more robust legislation to place statutory duty to tackling the causes and effects of homelessness on all government departments, particularly the departments for Communities, Health, Justice and Education. In addition, statutory duties should be strengthened with regard to prevention and relief support along the lines of the Homelessness Reduction Act (2017) in England which increased the period within which support can be sought if threatened with homelessness from 28 to 56 days. Stronger legislation is required to protect the rights</p>	<p>Noted - The Strategic Action Plan for Temporary Accommodation outlines Housing Executive plans to meet temporary accommodation need and is the subject of a separate consultation.</p> <p>Noted - Comments will be provided to Department for Communities for consideration in development of the Housing Supply Strategy.</p> <p>Noted – This comment will be referred to the Department for Communities.</p>
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	<p>of vulnerable tenants and reduce their housing precarity in the private rented sector. The loss of rented accommodation is one of the top three causes of homelessness in Northern Ireland; low-income households in the private rented sector are among those most likely to live in poor quality housing. There is a need for rent regulation. A review of the implementation of priority need should be conducted to establish the impact upon those demographic cohorts which tend to fall down on this element of the test.</p> <p>Resources:</p> <p>We acknowledge the Housing Executive’s statement around significant investment being required for both funding and resources. It would strengthen the Housing Executive case if it were able to quantify the level of resources required, how they will be allocated and to lobby for it to be committed to on a multi-annual basis.</p> <p>Adequate financial resourcing is critical to the delivery of this plan. A significant proportion of current spend covers staffing costs which is the single most important enabler of services. The future success of this strategy will be determined by our collective ability to attract, train and retain staff. The funding needed to make this happen needs to be reviewed as a matter of urgency. The Housing Executive and Department should be mindful of the funding stasis experienced over the 14 years the current/future challenges of stagnant pay rates, increase in Employers NIC</p>	<p>Noted – The Housing Executive has provided a general comment in response to all comments on funding in the introduction of this document.</p> <p>Noted – The Housing Executive has provided a general comment in response to all comments on funding in the introduction of this document.</p>
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	<p>rates, Auto-enrolment pension, Apprenticeship Levy, as well as the significant increase in the National Minimum and Living Wage rates.</p>	
<p>Sinn Féin</p>	<p>This response was one of a number which were not submitted on the consultation template provided and therefore no answers to the yes/no questions were received.</p> <p>Sinn Féin welcome the overarching vision that ‘Ending Homelessness Together’ reflects the need for a shared commitment between the Housing Executive, government departments and local housing and homeless organisations and charities. This is important in addressing the varied and complex factors leading to homelessness, with a shared aim of ensuring that “wherever possible, homelessness should be prevented, if homelessness cannot be prevented it should be rare, brief and non-recurring.”</p> <p>The strategy should also be gender aware, in light of research showing the challenges women experience which lead to chronic homelessness, and the specific barriers they face in finding and keeping settled accommodation.</p> <p>Sinn Féin also see a need for the Housing Executive, to extend out their engagement with the Central Housing Forum and Local Association Groups, to other S.75 groups who have specific issues to feed in to improve the evidence-base. This should include groups representing migrants,</p>	<p>Agreed – The Homelessness Strategy 2022-27 recognises the importance of collaboration and the Housing Executive will work with all relevant stakeholders in delivering our vision of ‘Ending Homelessness Together’.</p> <p>Agreed – The Housing Executive has previously commissioned research on this issue as per this link. The recommendations arising from this report will be considered in the delivery of the Homelessness Strategy 2022-27.</p> <p>Noted – The Housing Executive regularly reviews membership of implementation groups and this review includes consideration of any additional members to reflect regional or local challenges including other S.75 groups who have specific issues to feed in to improve the evidence-base.</p>

	<p>women, and children, etc and also organisations with forensic clients who may be leaving custody on short notice, with no advanced planning done in terms of housing.</p> <p>The term “citizens” in the final objective would be more appropriate than “customer” in recognition of the fact that such wording tends to place the conversation around housing and homelessness into something which is a mere commodity.</p> <p>Specific needs must be accommodated within temporary accommodations, including sufficient single-sex accommodation, youth homeless accommodation provisions, suitable sheltered accommodation to meet the need of older people whose housing challenges do not stop at the front door, and generally better planning around the needs of specific groups including solutions in the cases of racism, intimidation and hate crime impacting on people becoming homeless. Understanding need is vital.</p>	<p>Not accepted – The Housing Executive has referred to customers in an approach that reflects our organisation terms for those who avail of our services.</p> <p>Noted – This will be considered in the context of our Strategic Action Plan for temporary accommodation which refers to projecting needs which involves routinely analysing data and trend information in relation to customer needs (demand), the performance of the accommodation portfolio (supply), and throughput from temporary accommodation to permanent housing.</p>
<p>Social Democratic & Labour Party (SDLP)</p>	<p>Yes/No responses supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>The SDLP welcomes the opportunity to respond to this consultation agree with the overarching principles laid out within ‘Ending Homelessness Together.’ Given the complexities and multitude of issues that lead to homelessness in the first place, having a collaborative,</p>	<p>Agreed – The Homelessness Strategy 2022-27 reflects the importance of collaboration and the Housing Executive recognises the role our statutory and voluntary partners have in addressing homelessness.</p>

	<p>cross-cutting approach is key in the effectiveness of this strategy.</p> <p>The SDLP want to see the establishment of a plan that recognises the human impact of chronic homelessness and acknowledges the shortcomings in the current service provision to cater to those with various complex needs, such as those who are homeless, engaging in street activity (rough sleeping, begging), people with substance addictions and those leaving institutions.</p> <p>It is right to acknowledge that the majority of homelessness cases are crisis-led and in that vein it is important to address the root causes. This requires action at Executive level and a cross-departmental approach to preventing homelessness.</p> <p>The SDLP welcomes the Housing Executive's work to improve access and inclusion for marginalised individuals. It is vital that persons from abroad eligible for assistance, with the right to reside and to access public funds in the UK, do not fall into the sub-group of eligible persons who have become restricted. 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>Agreed – The Homelessness Strategy 2022-27 will incorporate actions from the Chronic Homelessness Action Plan in to the Homelessness Strategy 2022-27, as noted in the strategy.</p> <p>Noted – As per the Homelessness Strategy 2017-22 the Homelessness Strategy 2022-27 will be supported by an Inter-departmental Homelessness Action Plan which will be developed by the Department for Communities and involve actions on behalf of other departments.</p> <p>Noted – The Housing Executive is represented on a Regional Delivery Group which involves a range of stakeholders relevant to asylum seekers and refugees. This comment will be shared with the Regional Development Group in order to explore whether current partnerships are appropriate and/or whether new groups are required.</p>
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	<p>A pathway must be established within this framework to assist homeless people with the transition from temporary/emergency accommodation to long term homes. Currently that support/ framework is non-existent.</p> <p>The SDLP propose that a service user’s 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>Agreed – Objective 3 of the draft Homelessness Strategy 2022-27 notes the challenges in respect of the transition from temporary to settled accommodation and outlines a range of actions to address such challenges.</p> <p>Agreed – The draft Homelessness Strategy recognises the importance of lived experience and will ensure that service users have the opportunity to contribute to the delivery of the Homelessness Strategy 2022-27.</p>
The Rainbow Project	<p>Yes/No responses generally supportive of vision, aim, principles, objectives, actions and enablers.</p> <p>We agree that the extension to the prevention fund is key to helping to address LGBTQIA+ homelessness prevention by continuing to support clients who are among the most marginalised in our community...We believe that extension to the prevention fund as this helps to fund an LGBTQIA+ Housing Officer and that this should be done on a longer than six-month funding model.</p> <p>The current housing crisis, has housing unaffordable for many and placed home ownership out of reach for a generation of young people, has had on people and families across Northern Ireland. There are huge demands on the cost of renting and increase of over 25% since 2016. This has a massive impact on the capacity of people to not only</p>	<p>Noted – The Housing Executive acknowledges the impact the Homelessness Prevention Fund has had over the course of the Homelessness Strategy 2017-22 and notes appreciation to organisations such as The Welcome Project who have helped ensure that the prevention fund has been widely regarded as successful.</p> <p>As noted in this document the issue of housing supply will be brought to the Department for Communities for consideration, particularly in context of alignment with the Housing Supply Strategy.</p>

	<p>access accommodation, salaries not rising to meet this and people having issues in order to save both deposit and first month needed to secure a home. Occasionally clients we see through our housing project in a crisis homelessness situation are there because they have had a family, housemate or relationship breakdown and they cannot afford to rent another place due to lack of funds or low income.</p> <p>Moving into the HMO is not always the best option for clients who have experienced harassment for their sexual orientation or gender identity, as they have a real or perceived fear of experiencing homophobia/biphobia/transphobia. These clients often would like to be housed in a single let property, but there is a severe lack of this type of accommodation in Northern Ireland.</p> <p>The Rainbow Project would urge the Housing Executive to consider continuing to support organisations who are providing front end services to the clients experiencing homelessness. We need to have greater responsive appropriate housing and LGBTQIA+ safe spaces for the community who are experiencing incidents of homelessness.</p> <p>Additionally, more work needs to be done to work with Gay and Bi Men who are experiencing domestic abuse, there is</p>	<p>Noted – This comment will be considered in context of the Strategic Action Plan for Temporary Accommodation which was subject to consultation at the same time as the draft Homelessness Strategy 2022-27.</p> <p>Noted – The Housing Executive is keen to work with organisations such as The Rainbow Project in order to address any challenges in respect of service provision for LGBTQIA+.</p> <p>Noted – The Housing Executive is committed to addressing the needs of all client groups and keen to work with organisations</p>
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	<p>work that needs to be undertaken to support them and train NIHE on the LGBTQIA+ experiences of domestic abuse.</p> <p>First of all, NIHE must look internally at its current data and highlight where there are gaps. Does it effectively capture people’s experiences and identities – in terms of sexual orientation and or gender identity? What characteristics are missing from your data?</p>	<p>such as The Rainbow Project in identifying challenges for Gay and Bi Men who are experiencing domestic abuse.</p> <p>Noted – The Housing Executive will consider how we can improve our data gathering in order to improve service delivery.</p>
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