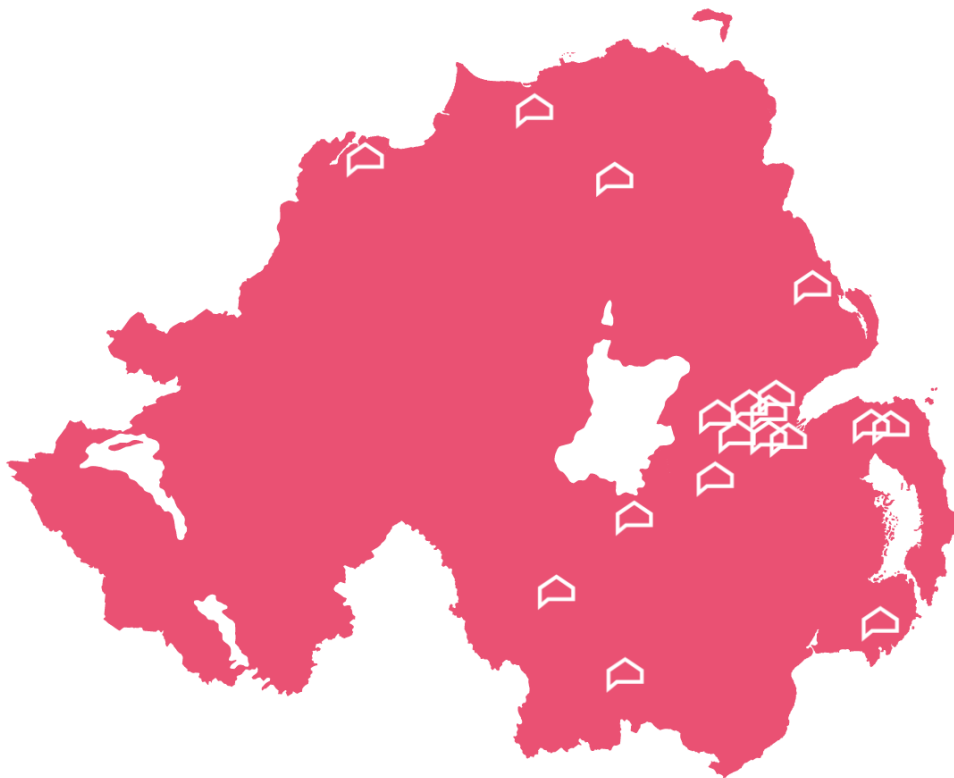


Simon Community Submission to the Draft
Programme for Government Consultation 24-27

November 2024



Consultation Questions

1. Are you responding as an individual or on behalf of an organisation?

On behalf of an organisation

2. Please provide your organisation's contact details below:

Organisation name: Simon Community

Organisation email address: cathybrolly@simoncommunity.org

3. Which of the following best describes the sector you work in?

Not for profit

4. Can we contact you to discuss your response to this consultation?

Yes

5. Can we contact you in future about the draft Programme for Government?

Yes

6. To support transparency in our decision making process, we will publish a summary of the consultation feedback on the PfG webpage. This will sometimes include the responses themselves and may mention names of the responding organisation (if applicable). However, names of individuals responding on a personal capacity will only be published where consent has been given. Please note we will not publish contact details.

Yes, I consent to my name being published with my response.

Introduction

Simon Community welcomes the opportunity to respond to the draft Programme for Government consultation. After years of campaigning by the housing and homelessness sector, we are encouraged to see Government take decisive action by identifying the expansion of social, affordable and sustainable housing as an urgent and immediate priority for Northern Ireland.

As Northern Ireland's largest homelessness charity, Simon Community is determined in our commitment to ending homelessness. Operating right across the region, we provide preventative services, temporary accommodation and specialised support services that address the unique challenges faced by those experiencing homelessness. In the past year, we've provided vital support to around 1400 people through our accommodation and support services and responded to nearly 18,000 calls for help to our free 24/7 support line.

Simon Community's aim is not only to provide immediate assistance but also long-term solutions that end the cycle of homelessness for good. We work in partnership with all sectors, embrace innovative approaches and leverage the strength of our relationships to create meaningful change and ensure a society where everyone has a place to call home.

There is no denying that Northern Ireland is in the middle of a housing and homelessness crisis. Every day, Simon Community staff are on the frontline of this crisis and we are deeply aware of the immense challenges faced by those we help. Unless we do things differently, homelessness in Northern Ireland will only get worse, with more and more people living with the devastating effects of not having a safe space to call home. We welcome the focus in the draft Programme for Government on delivering more housing, as well as homelessness prevention, but stress that homelessness is more than just a housing issue. It is linked to poverty, poor mental health, addiction, low educational attainment, lack of job opportunities, relationship breakdown and domestic abuse. Tackling the issue therefore requires our collective attention and action, with all Departments in the Executive taking ownership and committing to collaborative working.

However, Simon Community are concerned about the lack of detail, outcomes, milestones and measurable targets within the draft. The Programme for Government is meant to be a guiding document, a route map of where we need to get to over the next few years and how we'll get there. While the draft document sets out at a high-level what we will do, it contains no detail on how we will do this, when and what we ultimately want to achieve. To enable us and others to make a truly informed response to this draft, this information should have been included as part of the consultation. As it hasn't been shared, we call on the Executive to provide further clarity by finalising and publishing delivery plans and outcomes for each of the priority areas as soon as possible so that we can get started on addressing these complex and important issues.

Since the publication of the draft Programme for Government, the scale of the housing and homelessness crisis has only increased with just under 89,000 people now on the social housing waiting list, 76% of whom are experiencing housing stress.ⁱ Over 58,000 people are now legally classified as homeless, which means 1 in every 33 people in Northern Ireland are now homeless (up from 1 in 34 in the space of only six months).ⁱⁱ A third of those who are homeless are children (under the age of 18) - this is shocking and unacceptable. And this is only what the official figures show – recent research by the Simon Community shows that there could be as many as an additional 25,000 people in Northern Ireland who are experiencing 'hidden homelessness' as they are not engaging with statutory services and are invisible to the official system.ⁱⁱⁱ

It is therefore more important than ever that the Executive urgently progress the commitments made in the draft Programme for Government and ensure access to affordable, sustainable and quality housing for everyone.

Simon Community's response to the draft Programme for Government focuses on the key areas that are particularly relevant to the people we work with and that we believe are vital for addressing the homelessness crisis in NI. Our full response can be found below and the main points include:

- We **welcome the aspirations and commitments** included in the draft document and would like to see detailed delivery plans shared as soon as possible. In particular we **want to see further details** provided on **how the Programme for Government will be funded, timelines for delivery** of the commitments within the plan and **clear targets for progress** under each priority area. We would also welcome further detail on how the Programme for Government will **align with and complement other existing and upcoming strategies and plans** such as the Northern Ireland Housing Executive's Supporting People Strategy 22-25 and Homelessness Strategy 22-27 (which is not mentioned in the draft document), as well as the upcoming Housing Supply Strategy.
- Homelessness is more than just a housing issue. To truly address the homelessness crisis in Northern Ireland and deliver on the commitments within the Programme for Government, we need to see **true cross-departmental collaboration** with each Department owning the role they can play in ensuring everyone in society has a home. One action that would support this would be a commitment from the Executive that the newly established Reform and Transformation Unit will **explore the true cost of homelessness to Northern Irish society** in terms of health and social care, justice, education etc.
- The **proposed 'Better Homes' metrics within the Wellbeing Framework are misleading and need to be reviewed** and amended to truly represent the current scale of homelessness in Northern Ireland. Consideration should also be given to the inclusion of new metrics around the use of temporary accommodation and new social home builds.
- *Cut Health Waiting Times:* We need to see a **greater focus on improving access to mental health and dual diagnosis services** within the Programme for Government and a commitment that the statutory sector will work with the charity sector as equal partners in supporting the mental health and addiction needs of those experiencing homelessness.
- *Ending Violence Against Women and Girls:* We strongly recommend that under the Housing Selection Scheme **prioritisation is extended to everyone whose lives are**

under threat or who are at risk of serious injury in their own home, including, but not limited to, those who have experienced domestic violence, intimidation on grounds of nationality, human trafficking and modern slavery.

- *Provide more Social, Affordable and Sustainable Housing:* We strongly endorse this commitment and the actions proposed but also call for:
 - **Enhanced collaboration between Government, the private sector and the charity sector** to identify and deliver innovative solutions to increasing housing supply.
 - A **reform of planning policies at local government level** to facilitate the prioritisation and progress of vital social housing development plans.
 - The **urgent publication and delivery of a fully resourced and ambitious Housing Supply Strategy** which includes updated targets for social homes to accurately reflect the current demand for housing in Northern Ireland.
 - An **end to or pause of the House Sales Scheme** in Northern Ireland.
 - Urgent **progress with the reform of the NI Housing Executive** to enable them to borrow and build.
 - **Housing First to become an established government policy / approach to ending homelessness** in Northern Ireland, representing a much-needed shift towards an enhanced focus on homelessness prevention.
 - An **increase in the Supporting People budget** to enable a sustainable homelessness sector.
- There needs to be **more focus and detail in the final Programme for Government on eradicating poverty**, which is a key driver for homelessness.

Doing What Matters Most Today: Cut Health Waiting Times

Please provide any other comments you have in relation to the 'Cut Health Waiting Times' priority.

Given the fact that mental health is one of the greatest health issues in Northern Ireland today, with one in five adults experiencing at least one mental health disorder at any one time^{iv}, it's very disappointing to see little to no focus on this within the draft Programme for Government. Despite the fact that the number of people waiting to access mental health services continues to increase to unacceptable levels, tackling our mental health waiting lists is not included as a proposed priority action within the draft document.

This is extremely worrying to Simon Community as it is well known that people who experience homelessness face significant health inequalities and are more likely to have poorer physical and mental health than the general population. Every day at Simon Community, we see people struggling with a range of complex needs, with poor mental

health the most prevalent. 79% of the people in our temporary accommodation services present with mental health issues, with 97% of them having a condition or illness likely to last for longer than 12 months.^v Common conditions we see include depression, anxiety, self-harm, dual diagnosis and PTSD, which highlights the complexity of need amongst the people we support, as well as the breadth of skills our frontline staff need to support them.

However, we know that people experiencing homelessness are often not able to access appropriate services in a timely way. A recent survey of those accessing both Simon Community and DePaul services found that 75% of respondents felt it was difficult for those experiencing homelessness to access support for their mental health.^{vi} Common barriers include a lack of available services within their area, issues with registering with a GP and challenges with drug and alcohol management. When asked what would improve mental health support for those experiencing homelessness, responses included having more accessible services such as walk-in clinics and removing barriers because of drug and alcohol use.

Enhanced dual diagnosis services and support are particularly essential. Many studies estimate that up to 20% of those who experience homelessness would fulfill the criteria of having a dual diagnosis of both a mental illness and substance use disorder.^{vii} That would mean that up to 7,800 adults experiencing homelessness in Northern Ireland right now could also be struggling with a dual diagnosis. If we don't address both issues together, recovery becomes far more difficult. Yet we know that people experiencing homelessness in Northern Ireland face significant challenges in accessing services that address both mental health and substance use needs. This is recognised in the 2021-2031 Mental Health Strategy for Northern Ireland which commits to creating *"a managed care network with experts in dual diagnosis, supporting and building capacity in both mental health and substance use services, to ensure that these services meet the full needs of those with co-occurring issues"*. Simon Community support this and urge much-needed progress with this action.

It's clear that much more must be done to adequately support those experiencing homelessness with their mental health and other needs. Without early intervention, people are forced to access services via crisis pathways such as A&E departments, placing further burden on emergency services and frontline staff. Failing to offer integrated services and early interventions will only keep people trapped in homelessness, at an ever-increasing cost to public services.

At Simon Community, our vision is for people who are experiencing homelessness to get the right support at the right time so as to enable their permanent journey out of homelessness. But long waiting lists for statutory services, as well as a lack of dual diagnosis services, has

meant that our frontline staff – who are often not mental health professionals - have to step-in and provide the only source of support for people with complex and significant needs.

We have attempted to fill this gap through Simon Community’s Drug and Alcohol and Wellbeing services which provide psychosocial interventions, harm reduction techniques and counselling to clients who cannot access statutory mental health services due to their addiction issues. By addressing mental health and addiction issues that can often make sustaining stable housing difficult to maintain, these services offer a lifeline to people who might otherwise fall through the cracks of statutory services. These efforts – while essential – should not however be viewed as stopgap measures to an issue that requires more comprehensive solutions. The charity sector should not be left to provide this vital support to vulnerable individuals alone, particularly when temporary funding arrangements make it extremely difficult to create sustainable services. **Simon Community would therefore like to see a greater focus on improving access to mental health and dual diagnosis services within the Programme for Government and a commitment that the statutory sector will work with the charity sector as equal partners in supporting the mental health and addiction needs of those experiencing homelessness.**

Doing What Matters Most Today: Ending Violence Against Women and Girls

Please provide any other comments you have in relation to the ‘Ending Violence Against Women and Girls’ priority.

Homelessness among women has been growing in Northern Ireland over recent years, with females now accounting for a third of Simon Community’s client base. Pathways into, and experience of, homelessness can often look different for women, with women often more likely to have experienced domestic violence, abuse and trauma.^{viii} Simon Community have therefore recognised that women need to be provided with the option of living in a service that is designed specifically for them and their needs, and delivered by staff who can work with them in a trauma-informed way. That’s why, with support from the Northern Ireland Housing Executive, we are in the process of transforming one of our current temporary accommodation sites into a women’s only service. Our hope is that this will offer women who are experiencing homelessness more options for temporary accommodation than is currently the case in Northern Ireland.

According to the latest statistics, almost 1 in 14 of those presenting as homeless to the Housing Executive within the last year cited domestic violence as their primary reason for doing so.^{ix} This includes both males and females as domestic violence can, of course, happen to anyone.

Unfortunately, under the current Housing Selection Scheme, domestic violence and abuse does not fall within the criteria for awarding intimidation points. We are aware that changes to the Housing Selection Scheme are currently ongoing and that this includes an exploration of options for the future of intimidation points. As part of this review, **Simon Community recommends that prioritisation is extended to everyone whose lives are under threat or who are at risk of serious injury in their own home, including but not limited to those who have experienced domestic violence, intimidation on grounds of nationality, human trafficking and modern slavery.**

Doing What Matters Most Today: Provide More Social, Affordable and Sustainable Housing

How much do you agree that the priority 'Provide More Social, Affordable and Sustainable Housing' should be included in the Programme for Government?

Strongly Agree.

Please provide any other comments you have in relation to the 'Provide More Social, Affordable and Sustainable Housing' priority.

Simon Community welcome the inclusion of a housing priority for the first time ever in the draft Programme for Government. This is something the sector has been calling for for many years. Adequate housing is a human right and we are pleased that the Executive agree that everyone in our society should *'have access to affordable, sustainable and quality housing that meets their needs within thriving and inclusive communities'*.

We agree with the commitments and proposed actions within the document for addressing this priority and believe that we now have a real opportunity to do things differently to end homelessness in our society.

We will respond to each of the proposed actions under the housing priority below:

We will unlock the combined skills & resources of government, private & third sectors, finding solutions and creating opportunities to transform supply & improve quality across the whole housing system.

We welcome this commitment as the charity sector has a huge role to play in the development of new and innovative solutions for addressing social issues such as homelessness and in helping government to meet their housing targets. The charity sector has reach into communities and expertise that public services do not. We must therefore be viewed as equal delivery partners for the Programme for Government.

At Simon Community, we recognise that while a critical service to those in need, residing in temporary accommodation for extended periods of time can make it more difficult for people to exit homelessness. In response to this and the significant shortage of housing supply and move-on options, we launched our 'Creating Homes' programme in 2022 to offer people pathways out of homelessness. We buy and manage our own rental properties as a socially responsible landlord and currently have 24 homes in our portfolio. We plan to significantly scale this up over the coming years and purchase more properties so that we can offer long-term homes to even more people. Our hope is to also explore funding opportunities to develop a management service for private landlords which would enable further expansion of the 'Creating Homes' programme, supporting more people into long-term homes.

The impact of having a safe and secure place to call home is life-changing as can be seen in this comment from a 'Creating Homes' tenant:

"Home to me is security, comfort, and for right now it means this place. You have one life, might as well make it as happy as you can. And thanks to this home, I am happier than I have been in a long, long time".^x

'Creating Homes' is also extremely cost-effective. We estimate that housing someone in temporary accommodation is almost six times more expensive than being housed in one of our 'Creating Homes' properties.

We are aware of the proposed Loan to Acquire Move On Accommodation (LAMA) scheme that is currently being developed by the Department for Communities and would welcome further detail on this as well as **opportunities to explore how we can work better with government and the private sector to further scale up solutions such as the 'Creating Homes' project.**

We will ensure that the planning system supports the delivery of the appropriate supply of housing, creating sustainable & inclusive spaces, & work with NI Water to help facilitate housing growth.

A well-functioning planning system is critical for enhancing housing supply. Unfortunately, as highlighted in a 2022 report by the Public Accounts Committee, Northern Ireland's planning system is not fit-for-purpose with unacceptably slow decision-making processes.^{xi} We welcome the commitment to ensure our planning system supports delivery of appropriate housing supply and **would encourage an urgent reform of planning policies at local government level to facilitate the prioritisation of much-needed social housing development plans.** Planning policy changes that Simon Community would urge consideration of as part of this reform include:

- Mandating a minimum percentage of affordable housing units in all new housing developments (as per the Policy HOU5: Affordable Housing) – this would directly increase social housing stock while also integrating social housing into broader residential developments and communities.
- A fast-track planning approval for social housing projects – this would significantly shorten timeframes from proposal to construction.
- Policies and incentives that encourage the use of brownfield sites among developers – this would help increase housing stock in areas where much of the infrastructure for new homes is already in place.
- Designating available public land for social housing development – this could reduce land costs if public body landowners transfer or lease unused land at discounted rates.
- Flexible design standards for social housing – this would enable pace and scale while also lowering costs and increasing sustainability.

It is positive to see the commitment to work with NI Water to help facilitate housing growth. Years of underfunding has led to our current water infrastructure capacity issues which are significantly hindering the construction of much-needed new homes. The Construction Employers Federation have estimated that around 19,000 homes in Northern Ireland are currently unable to proceed due to constraints on wastewater capacity.^{xii} Progressing these 19,000 homes could have a significant impact on the social housing waiting list, cutting it by as much as 40%.^{xiii} Establishing a new funding model for NI Water is critically important and we would welcome further information from the Executive on how they plan to finance this, including whether water charges are an area they will explore.

We will deliver a NI Housing Supply Strategy to provide a long-term framework for the policies and actions required to increased the supply of homes across all tenures & reduce housing stress.

Northern Ireland is in urgent need of a new Housing Supply Strategy. A lack of an agreed strategy is having a significant impact on our work with our clients having to remain in temporary accommodation for longer due to fewer and fewer housing options. Simon Community welcomed the draft Housing Supply Strategy published in December 2021, viewing it as an ambitious document with the potential to significantly impact housing supply in the medium term. We are disappointed at the continuing delay with publishing the final Strategy, particularly given that housing supply challenges have only intensified. Since the draft Strategy was published, demand for social housing has surged, affordable housing remains scarce, and the private rental sector continues to be increasingly unaffordable. This has resulted in a growing reliance on temporary accommodation, with the Housing Executive

struggling to keep up with the demand for short-term housing solutions. Moreover, the world has changed significantly over the past few years, bringing new economic and social pressures to bear. The draft 2021 Strategy outlined a goal of building around 33,000 social homes over the next 15 years. Three years later we now have 48,000 households on the social housing waiting list, a number that is continuing to grow. 33,000 homes will simply not be enough to meet demand. To secure sustainable housing for the future, a fresh and fully costed Housing Supply Strategy is therefore essential.

Simon Community call on the Communities Minister to urgently finalise and deliver an ambitious, fully costed and resourced Strategy which offers a range of innovative, affordable and scalable solutions for enhancing housing supply in Northern Ireland. We would encourage the Minister and his department to use learning and best practice approaches from elsewhere (e.g. Scottish Government's Housing to 2040 strategy) to inform the new Strategy as well as hold a comprehensive public consultation process. We also urge the Minister and his Department to set updated targets in the new Strategy which accurately reflect the current demand for housing in Northern Ireland.

Critically, as well as building new homes, we must also ensure that we protect the homes we already have by ending or pausing the House Sales Scheme as recommended by the Northern Ireland Human Rights Commission in 2021.^{xiv} Northern Ireland is currently the only devolved nation to have not done this and Simon Community are very concerned that any efforts to increase the supply of social housing will be undermined by the continued sale of Housing Executive properties. In 2023/24, 1403 homes were completed under the Social Housing Development Programme.^{xv} Yet in that same year, 276 properties were sold through the House Sales Scheme, which represents an approximate 20% deduction to the newly added housing stock that year.^{xvi}

Given the fact that we only hope to build up to 600 new social homes this year, we are extremely concerned that we may end up selling more housing stock than we can replace, thereby further exacerbating the social housing waiting list.

Simon Community believe that ending or pausing the House Sales Scheme is an essential step to preventing the further erosion of our limited social housing stock and call on the Communities Minister to take urgent action on this.

We will seek Treasury agreement for appropriate treatment of borrowing to enable the NIHE to increase investment in its homes, improve energy efficiency & contribute to new supply.

With just under 89,000 people on the social housing waiting list, change is urgently needed to increase the supply of social homes in Northern Ireland. We strongly welcome this

commitment as we believe that enabling the NIHE to borrow against its' assets will have a significant positive impact on the supply and condition of social housing.

We are aware that engagement between the Executive and the Treasury is currently taking place on this issue and would **urge the Executive to prioritise and expedite this work so that a timetable for the way forward can be agreed as soon as possible.**

Following the Northern Ireland Housing Executive, Housing Associations are the second largest social landlord in Northern Ireland, managing more than 59,000 homes.^{xvii} Yet, despite their significant role in the provision of both social housing and temporary emergency accommodation, Housing Associations are surprisingly not mentioned anywhere in the draft Programme for Government. We would therefore be interested to learn more about the Executive's plans for how Housing Associations can, alongside other stakeholders mentioned in the document, better support those both experiencing and exiting homelessness.

We will focus on preventing homelessness, making it brief, rare & non-recurrent by working collaboratively, prioritising housing solutions for those most in need & developing innovative funding models with third sector partners to purchase homes. One such initiative is the DfC, through the NIHE, working with the DoJ, to embed permanent systems change to prevent homelessness among young people coming out of care. In doing so, we will bring forward a pilot programme that will support young people leaving care and help to prevent this group from the risk of homelessness.

Simon Community strongly welcome this commitment as homelessness prevention is central to the ethos of our work. We know that the best thing we can do for people is prevent them from needing our support services in the first place.

However, we are aware that budget challenges and our current spend on temporary accommodation are limiting our capacity to fund homelessness prevention services. In their response to the Department for Communities recent budget EQIA consultation, the Northern Ireland Housing Executive warned that the proposed budget would lead to cuts in services and that wraparound and prevention services would have to be greatly reduced.^{xviii} How does this align with what's being proposed in the Programme for Government? Will the Executive commit to ring-fenced funding for homelessness prevention services?

At Simon Community, our first point of contact for many people who need assistance is our freephone support line. In the past 12 months, our team received around 18,000 calls from people desperate for help and advice – a 12% increase on the year before. Often, we are able to provide help and support to address the problem, preventing it reaching crisis point and stopping homelessness before it starts.

Our 'Creating Homes' scheme detailed above helps us provide a pathway out of homelessness for many, as does our Tenancy Deposit Scheme which helps people experiencing or at risk of homelessness. The scheme helps to remove financial barriers to accessing the private rented sector by providing deposits. This reduces demand for social housing while also preventing many people from entering the homelessness cycle in the first place. We have recently provided our 500th deposit, giving people the opportunity to create a safe space to call home.

Simon Community particularly welcome the focus within the draft Programme for Government on care leavers and the commitment to a pilot programme to prevent this often vulnerable group from entering homelessness. We would welcome further detail on this pilot programme as soon as possible – how will it work, what partners will be involved, what is the role of relevant Departments such as Health, how will it be scaled up if successful and what consideration has been given to expanding this programme to other groups at increased risk of homelessness (e.g. those leaving prison)?

Young people leaving care are a priority group for the Simon Community as we aim to prevent repeat homelessness and support people at the earliest opportunity. It is well known that young people who have been in care are overrepresented within the homeless population^{xi}^[OBJ] and that a third of care leavers become homeless in the first two years after leaving care^{xx}^[OBJ]. This would mean that of the 607 young people aged 16-19 who left care last year^{xxi}^[OBJ], over 200 of those young care leavers will become homeless by 2025. ^[OBJ]This is completely unacceptable. Given that we can predict when young people will leave care, there is no excuse for this vulnerable group being further failed by society and becoming homeless. We must do better.

One service that Simon Community provide for care leavers is our Housing First For Youth programme. This service supports young people who are leaving care by giving them a home and providing intensive, 24/7, wraparound support to help them thrive within their community, thereby helping to prevent homelessness. To date, we have provided intensive support to 32 young people leaving care via this service and have recently received referrals for four more care leavers to join the programme.

Currently Simon Community's Housing First For Youth service, which is commissioned by the Northern Ireland Housing Executive and Health and Social Care Trusts, is only available in three Trust areas. However, our aim is to partner with all Trusts to ensure we can effectively provide an intensive service for all young people leaving care who require this support. Additionally, we are seeking to expand the service to meet the needs of all young people experiencing homelessness, especially those identified by the Housing Executive as having complex needs.

Housing First is based upon the principle that housing is a human right. It therefore focuses on giving someone immediate access to a settled and secure home and then addressing people's support needs through coordinated and intensive support. There is overwhelming international evidence about the effectiveness of Housing First, with studies showing that it can help people with complex needs sustain permanent accommodation while also helping to resolve or improve other non-housing issues they might face.^{xxii}

One country that is leading the way in ending homelessness is Finland. Since 2007, national policies in Finland have shifted towards reducing long-term homelessness through Housing First programmes. This has meant a widespread adoption of prevention strategies across the country as well as a phasing out of emergency shelters and models of communal supported housing and replacing this with housing-led approaches. As a result, the use of emergency and temporary accommodation in Finland has significantly declined with Finland currently one of the only European countries that has a decreasing homeless population.^{xxiii}

The success in Finland shows that ending homelessness is possible with innovative approaches and a shift towards preventative policies.

Simon Community urges the Executive to learn from Finland and other countries who have embraced Housing First within national strategies to address homelessness and make Housing First an established government policy / approach to ending homelessness in Northern Ireland which has buy-in and commitment to deliver from all relevant departments. It's important to remember that Housing First is not a quick fix to ending homelessness – it's a long-term commitment that brings financial savings over future years as well as real benefit to people's lives.

We will continue to prioritise housing support for vulnerable people across our society through NIHE's three year Supporting People Strategy.

Simon Community support the actions within the Supporting People Strategy so welcome this commitment. However, we would like to take this opportunity to point out that current funding levels for Supporting People are inadequate and that the resources available to providers like ourselves within the homelessness sector are insufficient to meet increasing demand and the needs of the people we support.

Despite the recent funding boost, the Supporting People programme has not kept pace with inflation for over a decade, leading to persistent financial difficulties for providers. Staffing is one of the largest costs associated with the delivery of Supporting People services. Yet providers often struggle to recruit and retain staff due to insufficient and uncertain funding. Currently, Simon Community have a 16% vacancy rate in our accommodation and community support worker roles – a key role that provides 24-hour support to those

accessing our services. This high vacancy rate places considerable strain on our staff, who often go above and beyond to support those experiencing homelessness, and negatively impacts staff morale. The 6.7% national living wage increase recently announced in the Autumn Budget, while welcome for workers, will only further exacerbate financial pressure on providers unless there is a matched increase in Supporting People funding.

As an equal partner with a vital role to play in the prevention and reduction of homelessness, **we urge the Executive to ensure the sector is properly resourced and financially stable via multi-year Supporting People budgets with recurrent annual inflationary uplifts.** Doing so would better allow us to attract and retain staff while also acknowledging the vital work of the sector. Without consistent inflation-adjusted increases, the sector will only continue to struggle and its' sustainability will be threatened.

By 2025, we will launch a new Fuel Poverty Strategy to support those struggling with the cost of living.

We welcome the commitment to launch a Fuel Poverty Strategy and look forward to hearing more detail on what the Strategy will contain as well as how it will be funded.

We will help people get a foot on the housing ladder by continuing our investment in shared ownership homes, supported by low-cost loans to deliver 800 per year. The selection of a new intermediate rent operator will help increase access to affordable homes.

We welcome these commitments to enhance access to long-term, affordable housing and look forward to further detail on how these projects will be expanded across Northern Ireland.

We will continue our programme of reform of the private rented sector and review the Northern Ireland Housing Executive Private Sector Grants, including the Disabled Facilities Grant, to ensure they effectively meet the needs of those they aim to help.

We welcome this commitment as 'accommodation not reasonable' and 'loss of rented accommodation' are among the top three reasons for people presenting as homeless.^{xxiv} Every day at Simon Community, we hear stories of people being evicted from their private rental home through no fault of their own or for being unable to afford the increasing cost of rent. According to a recent Ulster University report, average rents in Northern Ireland have increased to £886 per month, with even higher rates in the Belfast area at an average of £1,019 per month.^{xxv} The rise in rent prices, combined with stagnant incomes and the wider cost-of living crisis, is pushing affordable housing further out of reach for many individuals and families, leaving them vulnerable to homelessness.

It is also concerning that our private rented sector remains unregulated with many people often having to live in substandard conditions. Improving renting is a vital part of what needs to happen to ensure everyone has a safe and affordable place to call home. We would therefore welcome further detail on what the reform of the private sector will look like and what is being considered as part of this. Has the Executive considered learning from the introduction of rent caps in Scotland in 2022? What consideration has been given to banning 'no-fault evictions' as backed by the Northern Ireland Assembly in a motion earlier this year^{xxvi}? Simon Community would welcome exploration of these measures but would also urge consideration of any potential unintended consequences in terms of reducing housing supply.

Doing What Matters Most Today: Reform and Transformation of Public Services

Please provide any other comments you have in relation to the 'Reform and Transformation of Public Services' priority.

It is positive to hear the commitment to establish a Reform and Transformation Unit that will work across departments. It is well acknowledged that homelessness is not just a housing issue. It's a multifaceted series of complex life experiences that culminate in people having nowhere to live. It's caused by poverty, poor mental health, addiction, low educational attainment, lack of job opportunities and domestic violence. Tackling and preventing homelessness therefore requires a coordinated approach across government departments.

Sustained and repeated homelessness has a significant impact on public expenditure with some research estimating that the cost to public services for one person being homeless for one year is around £35,000.^{xxvii} That same research has estimated that if 40,000 people were prevented from experiencing one year of homelessness, public spending would fall by £370m. Therefore, while also being morally the right thing to do, there is a strong economic argument for investing in the prevention of homelessness.

One area that we would therefore encourage the new Reform and Transformation Unit to explore is the true cost of homelessness to Northern Irish society in terms of health and social care, justice, education etc. Doing so would better enable us to work collectively across departments and sectors to tackle both the drivers of homelessness and delivery of the solutions to end homelessness.

Doing What Matters Most Today: Priorities

Are there any other priorities that should be included in the Programme for Government?

We are surprised and disappointed that eradicating poverty is not an identified priority in the draft Programme for Government. Poverty is one of the most significant drivers of

homelessness and the cost-of-living crisis continues to heap further pressure on vulnerable families and individuals limiting their access to affordable housing. Given that around 270,000 people in Northern Ireland are currently living in absolute poverty, including almost one in five children^{xxviii}, **Simon Community would like to see more focus and detail in the final Programme for Government on how we can tackle this important issue, not least through the delivery of a properly funded Anti-Poverty Strategy.** The Executive committed to development of this strategy in the New Decade, New Approach deal of 2020, yet this still has not been delivered.

Understanding Missions by Tracking Wellbeing

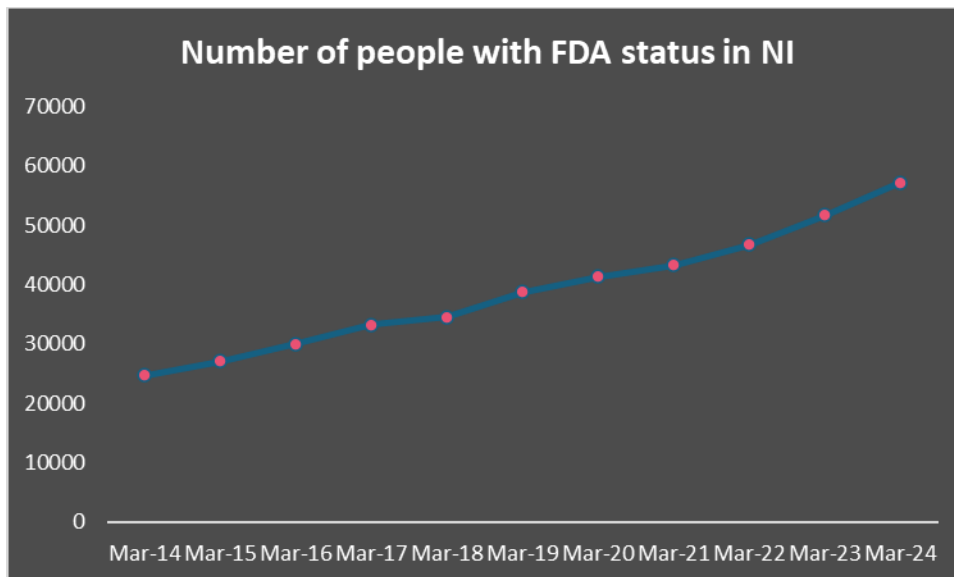
The draft Programme for Government outlines how it will measure progress through a Wellbeing Framework. How much do you agree with the proposed approach?

As mentioned at the start of our response, Simon Community would like to see further detail on targets and outcomes for the Programme for Government. It is all well and good to know *how* we will measure progress but we also need to know *what* we are aiming to achieve in terms of these indicators (i.e. what does positive progress actually look like?).

Simon Community also have concerns around some of the indicators being proposed to measure progress under the 'Better Homes' domain and would welcome further detail on how the Executive decided on these specific metrics and who they engaged with to inform that decision-making.

In particular, we do not believe the 'Homelessness' metric accurately represents the true scale of the homelessness crisis here. With 1 in 33 people in Northern Ireland currently homeless, including around 20,000 children, it is deeply disappointing to see the data presented in a way that would suggest the situation is improving. This is highly misleading.

Currently, the metric is only based on the number of people who present and are accepted as homeless per year. **Simon Community believe that a more accurate metric to instead use would be the total number of people (not households) who are currently officially classified as homeless (i.e. with Full Duty Applicant status) in Northern Ireland.** As illustrated in the graph below, this number is increasing each year. We believe this metric would better capture the true scale of the crisis by including both people who present and are accepted each year as well as those that have been homeless for longer.



Source: DfC Response to AQW 14882/22-27 (Oct 2024)

We also believe that we should not just limit ourselves to measuring what is already available and would therefore also **suggest the creation and inclusion of the following new indicators for the 'Better Homes' domain:**

- **Use of temporary accommodation, including non-standard accommodation.** Given the soaring costs of such accommodation in Northern Ireland, we believe that the Executive should be setting targets for reducing the use of temporary and non-standard accommodation.
- **Number of social housing new starts and completions.** Given that providing more social, affordable and sustainable housing is a priority area in the draft Programme for Government and with a Housing Supply Strategy imminent, we would have expected to see an indicator that measures improvements in our housing stock in Northern Ireland over the coming years.

Additional Information

Do you have any further comments relevant to this consultation?

While we welcome the commitments and aspirations in the draft Programme for Government, it does seem that there is a disconnect between the ambitions of the document and the available budget. Over the past few months, the Executive have made clear the budget pressures facing our public services. How do we therefore plan to raise the revenue that is needed to deliver this ambitious plan?

We welcome the fact that the Executive are currently advocating for multi-year budgets for Northern Ireland. We believe this is key to successful delivery of the Programme for Government and would provide much-needed continuity and stability to the delivery of public services. In terms of Simon Community services, multi-year budgets would be transformative in terms of recruiting and retaining frontline staff, providing a level of stability that is impossible with annual budgets. With a multi-year commitment, we can offer secure, longer-term and fairly paid contracts, making roles more attractive and reducing staff turnover among those in demanding frontline positions. This would enable better workforce planning, consistent investment in training and development and improve staff morale as staff feel valued and supported. A stable budget horizon doesn't just fill roles - it builds a resilient and experienced workforce that can focus fully on the complex needs of those experiencing homelessness and provide better continuity of care without the constant threat of funding cuts or job insecurity.

Simon Community acknowledge that while the cost of addressing homelessness in Northern Ireland might seem daunting, the long-term benefits and potential savings make it a strong financial investment. Comparative research from across the world shows that the cost of preventing and solving homelessness is much less than the cost of doing nothing. Ending homelessness benefits us all – it reduces costs for society, improves the lives of individuals and strengthens communities. It is clearly an investment worth making.

ⁱ Simon Community FOI Request to NIHE (Oct 24).

ⁱⁱ Simon Community FOI Request to NIHE (Oct 24).

ⁱⁱⁱ Simon Community. (2024). *Under the Radar: Unveiling Hidden Homelessness across the island of Ireland*. Available at: <https://simoncommunity.org/assets/pdfs/Under-the-Radar-Unveiling-Hidden-Homelessness-Across-the-Island-of-Ireland-FINAL-1.pdf>

^{iv} Office for Statistics Regulation. (2021). *Review of mental health statistics in Northern Ireland*. Available at: <https://osr.statisticsauthority.gov.uk/wp-content/uploads/2021/09/Review-of-mental-health-statistics-in-Northern-Ireland.pdf>

^v Simon Community Census (2021).

^{vi} Simon Community & DePaul. (2023). *Mental Health & Homelessness*. Available at: https://simoncommunity.org/assets/pdfs/SC_MentalHealthHomelessness_FINAL.pdf

^{vii} Crisis. (2009). *Mental ill health in the adult single homeless population*. Available at: https://www.crisis.org.uk/media/20611/crisis_mental_ill_health_2009.pdf

^{viii} Phipps, M. et al. (2019). *Women and homelessness: a complex multidimensional issue – findings from a scoping review*. *Journal of Social Distress and Homelessness*, 28, pp 1-13.

^{ix} Department for Communities. (2024). *NI Housing Statistics 23-24*.

^x Stuart is a Creating Homes tenant after becoming homeless following the death of his mother, whom he was a carer for. You can read more about Stuart's story here:

<https://simoncommunity.org/homelessness/stories/stuarts-story>

-
- ^{xi} Public Accounts Committee. (2022). *Planning in Northern Ireland*. Available at: <https://www.niassembly.gov.uk/globalassets/documents/committees/2017-2022/pac/reports/planning-in-ni/public-accounts-committee---planning-in-northern-ireland.pdf>
- ^{xii} [19,000 home backlog demands immediate action from NI Executive on governance and funding model of NI CEF \(cefni.co.uk\)](https://www.cefni.co.uk)
- ^{xiii} Based on 47,936 households currently on the social housing waiting list.
- ^{xiv} NI Human Rights Commission. (2021). *Response to the Department for Communities on the Housing Supply Strategy*. Available at: <https://nihrc.org/assets/uploads/publications/NIHRC-Response-to-DfC-Housing-Strategy-pdf.pdf>
- ^{xv} Department for Communities. (2024). *NI Housing Statistics 23-24*.
- ^{xvi} FOI to NIHE – January 2024. Available at: <https://www.nihe.gov.uk/getattachment/f76a5517-7933-4345-a1b9-96be8e673f81/Properties-sold-and-stock-transferred-to-Housing-Associations.pdf>
- ^{xvii} <https://nifha.org/>
- ^{xviii} NI Housing Executive. (2024). *Response to Department for Communities Budget 2024-25 Equality Impact Assessment*. Available at: <https://www.nihe.gov.uk/getattachment/f70cd07c-4ddc-4ae3-93d2-119e042322ec/NIHE-Response-to-DFC-Budget-EQIA-24-25.pdf#:~:text=It%20is%20our%20view%20that,and%20energy%20inefficient%20housing%2C%20and>
- ^{xix} Barnardo's. (2021). *No Place Like Home: A look at young people's experiences of leaving the care system*. Available at: <https://www.barnardos.org.uk/sites/default/files/2021-05/No-Place-Like-Home-Report-IKEA.pdf>
- ^{xx} Stein, M. & Morris, M. (2010). *Increasing the number of care leavers in settled safe accommodation*. London: C4EO.
- ^{xxi} Department of Health. (2024). *Northern Ireland Care Leavers 22/23*.
- ^{xxii} Crisis. (2018). *Everybody In: How to end homelessness in Great Britain*. Available at: https://www.crisis.org.uk/media/239951/everybody_in_how_to_end_homelessness_in_great_britain_2018.pdf
- ^{xxiii} [Finland - Housing First Europe](https://www.finland-housing-first.eu/)
- ^{xxiv} Department for Communities. (2024). *NI Housing Statistics 23-24*.
- ^{xxv} Ulster University. (2024). *Performance of the Private Rental Sector in Northern Ireland*. Available at: https://www.ulster.ac.uk/_data/assets/pdf_file/0010/1655173/PrivateRentalReport_H1-2024.pdf
- ^{xxvi} <https://www.insidehousing.co.uk/news/northern-ireland-assembly-backs-no-fault- eviction-ban-motion-86150?>
- ^{xxvii} Pleece, N. & Culhane, D.P. (2016). *Better than Cure? Testing the case for enhancing prevention of single homelessness in England*. London: Crisis.
- ^{xxviii} Northern Ireland Poverty and Income Inequality Report, 22-23.