The Northern Ireland Audit Office Report on Homelessness: A Missed Opportunity

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❯ **Abstract**_This article reviews the Northern Ireland (NI) Audit Office report on Homelessness in Northern Ireland (2017), placing it in the context of the existing body of knowledge regarding the efficacy of legislative, policy and strategic approaches to homelessness. A key emphasis is on the extent to which the report might support and direct meaningful change in respect to preventing and mitigating homelessness in NI, given that this issue has attracted enduring and intense policy attention, but with more limited substantive progress than might have been hoped for. The report's highly critical focus on deficits in data collection, evaluation and monitoring processes represents a welcome contribution to longstanding demands for improved performance in these respects, albeit that the Audit Office's own analysis appears to be framed by a flawed understanding of homelessness causation. On the critical topic of increasing housing supply and reducing housing demand, the report's failure to make recommendations that might support the type of radical change in responses to homelessness evident elsewhere in the UK (namely, housing-led, rapid-rehousing and Housing First approaches), is likely to come as a disappointment to many.

❯ **Keywords**_Northern Ireland, Audit Office Report, prevention, legislative change, policy change

Introduction

The release of the Northern Ireland Audit Office (NIAO) report on homelessness in November 2017 was both important and timely. The impact of United Kingdom (UK) wide economic and policy developments has been experienced differently in Northern Ireland. In the wake of the credit crunch, the Northern Ireland economy has recovered at a slower rate than the rest of the UK, with unemployment remaining notably higher (Fitzpatrick *et al.*, 2016). The impact of the *Northern Ireland (Welfare Reform) Act 2015* has been subject to a range of mitigation measures, but there remains considerable uncertainty regarding the potential impact on homelessness should mitigation measures be eased in 2020 (Northern Ireland Housing Executive (NIHE), 2017). This sense of uncertainty is further exacerbated by an ongoing major review of social housing and housing allocations in Northern Ireland, with ambiguity also persisting around the future ownership of Housing Executive stock and proposed changes to the status of Housing Associations (Fitzpatrick *et al.*, 2016; Boyle and Pleace, 2017; Department for Communities (DfC), 2017e). These uncertainties play out against the already complex sensitivities associated with the segregated nature of housing in Northern Ireland, with the jurisdiction being in the grip of a prolonged political crisis that has left it without a functioning executive since January 2017. Wider political shifts across the UK and beyond have introduced new and unprecedented factors to the Northern Ireland context. The 'confidence and supply' deal reached between the Conservative Party and the Democratic Unionist Party (DUP) in Westminster seems to offer potential gains for Northern Ireland, albeit at the risk of undermining parity of esteem between the main political parties, while the looming uncertainty of the United Kingdom's exit from the European Union holds particular implications for Northern Ireland, given its shared border with the Republic of Ireland (Keating, 2017; Watts and Fitzpatrick, 2017; Cabinet Office, 2018).

Against this background, questions persist with regards to the efficacy of legislative and strategic approaches to homelessness in Northern Ireland. The province is lagging behind other UK nations in adopting interventions that have proven central to the reduction and mitigation of homelessness, most notably in respect to preventative Housing Options and Housing First based initiatives (Fitzpatrick *et al.*, 2016; Boyle and Pleace, 2017; Watts and Fitzpatrick, 2017). Following the passing of the *Homelessness Reduction Act* (2017) in England, Northern Ireland now stands as an anomaly in the UK, with each of the other nations having undertaken a radical overhaul of homelessness legislation with the intention of widening the nature and scope of the statutory duty owed to homeless households (in Scotland in the early 2000s and in Wales in 2014). Each of these factors hold particular significance, given that homelessness in Northern Ireland has remained at historically high levels for over a decade (Fitzpatrick *et al.*, 2016; Boyle and Pleace, 2017). Indeed, Northern

Ireland is perhaps most notable in a UK context in having the highest population rates of recorded homelessness, with an ongoing increase in acceptances evident across the term of the 2012-17 homelessness strategy (Fitzpatrick *et al.*, 2016; Boyle and Pleace, 2017; NIAO, 2017; Watts and Fitzpatrick, 2017).

Released at the commencement of the new *Homelessness Strategy for Northern Ireland 2017-22* and just prior to the launch of the first *Inter-Departmental Homelessness Action Plan 2017-18*, the NIAO report appears particularly well placed to lend weight and impetus to the increased drive toward homelessness prevention, seen in recent years (DfC, 2017a; NIHE, 2017). Looking to the highly critical National Audit Office report on homelessness in England, which inspired more robust government leadership and informed significant legislative change, the precedent is clear in terms of the role that the audit function might play in supporting and directing meaningful change (National Audit Office, 2017; Fitzpatrick *et al.*, 2018). This review of the Northern Ireland Audit Office report on homelessness covers four key themes: the scale and nature of homelessness in Northern Ireland; monitoring and reporting of progress in delivery of the Northern Ireland homelessness strategy 2012-17; reducing demand and increasing supply; and, homelessness is more than a housing issue. The remainder of the article summarises and critically reviews these themes in turn.

The Northern Ireland Context

In the United Kingdom there are legal duties placed on local authorities to rehouse certain homeless households, with those accepted as owed the full rehousing duty being described as 'statutorily homeless'. Historically, a statutory duty has mainly been owed to families with children and vulnerable adults, with these groups being described as having 'priority need'. However, housing is now a devolved matter across the UK, and legislative change in England, Scotland, and Wales has introduced significant divergence with regards to the type of applicant owed a statutory duty and the form of assistance offered (Wilson and Barton, 2018). In Scotland, the removal of the priority need criterion means that a statutory rehousing duty is now owed to virtually all homeless applicants, including (crucially) single people, and in England and Wales the introduction of additional prevention and relief duties for households who are homeless or threatened with homelessness has significantly expanded the reach and nature of the statutory duty (Wilson and Barton, 2018). In contrast, legislation in Northern Ireland has remained largely unchanged and, as such, the duty owed broadly mirrors the original UK-wide legal duty first enacted in 1977: namely, that a duty is owed to homeless households (and those threatened with homelessness) who are unintentionally homeless and in priority need (Boyle and Pleace, 2017; Wilson and Barton, 2018).

Northern Ireland also differs from elsewhere in the UK in having a single strategic housing authority who has statutory responsibility to prevent and alleviate homelessness: namely, the Northern Ireland Housing Executive (NIHE). As well as assessing and discharging statutory homelessness duties, NIHE acts as the administering authority for the Supporting People (SP) programme in Northern Ireland, the role of which is to commission a range of housing-related support services for vulnerable people – including those who are homeless or at risk of homelessness – with the objective of improving quality of life and attaining independence (NIHE, 2018a).

The number of households presenting as homeless in Northern Ireland doubled to just over 20,000 in the six years to 2005/06 (Fitzpatrick *et al.*, 2016). Since this point, rates of homelessness presentation have remained in the region of 18,000 to 20,000 per annum (DfC, 2017d), with rates of repeat homeless presentations also stable for the last four years at around 7 per cent of all annual presentations (NIAO, 2017). Although homelessness *presentations* have remained broadly static, there has been a notable and consistent increase in the percentage of households *accepted* as statutorily homeless, from 51 per cent of presenting households in 2012, to 64 per cent in 2017 (Fitzpatrick *et al.*, 2016; DfC, 2017b; NIAO, 2017). Furthermore, and as noted above, the population rate of statutory homelessness in Northern Ireland is notable in that it is significantly higher than elsewhere in the UK "at almost 15 per 1000 of the population, compared to 11.7 in Scotland, 3.6 in Wales and 2.3 in England" (Watts and Fitzpatrick, 2017, p.3). Relatedly, Northern Ireland also shows a particularly high rate of social housing let allocations to statutory homeless households, at almost 80 per cent of all allocations made per annum (Fitzpatrick *et al.*, 2016; NIAO, 2017; Watts and Fitzpatrick, 2017), compared to much lower figures of around 16 per cent in England (MHCLG, 2018), 19 per cent in Wales and 42 per cent in Scotland[1].

In contrast, levels of rough sleeping in Northern Ireland appear exceptionally low (Fitzpatrick *et al.*, 2016; Boyle and Pleace, 2017). The *Belfast Street Needs Audit*, completed in 2015, found the average number of rough sleepers counted on any given night to be six (NIHE *et al.*, 2016). Subsequent street counts, completed in 2016 and 2017, have returned similarly low figures (NIHE, 2018). That said, some criticism has been levelled at the 'street count' approach to enumerating rough sleeping in Belfast (Boyle and Pleace, 2017; NIAO, 2017). Moreover, the existence of a sub-group within the Northern Ireland homeless population whose experience is marked by cyclical temporary accommodation (TA) placements, episodes of rough sleeping and other forms of homelessness, is long documented and has led

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[1]   See tables 103 and 104 in the UK Housing Review Compendium: https://www.ukhousingreview.org.uk/ukhr18/compendium.html

to increasing concerns regarding the efficacy of current service provision in the resolution and mitigation of homelessness for those with more complex needs (NIHE, 2005; Ellison *et al.*, 2012; NIHE, 2012; NIHE, 2012a; Boyle *et al.*, 2016; NIHE *et al.*, 2016: Boyle and Pleace, 2017; NIHE, 2017; McMordie, 2018). Service provision for this vulnerable group has been placed under particular scrutiny following a number of reported deaths among rough sleepers in late 2015 and early 2016 and it is widely acknowledged that further work is required to both understand and address chronic homelessness and rough sleeping in Northern Ireland (Fitzpatrick *et al.*, 2016; Boyle and Pleace, 2017; NIHE, 2017; McMordie, 2018).

The key focus of legislative and strategic approaches to the mitigation and resolution of homelessness in Northern Ireland have, for a considerable time, tended to focus on three critical themes: early intervention and prevention measures; provision to address long-term and chronic homelessness; and, facilitating access to affordable and appropriate permanent accommodation (NIHE, 2012; NIHE, 2012a; Department for Social Development (DSD), 2015; NIHE, 2017). It has long been accepted that the development of an evidence-based understanding of need within the homeless population, clear alignment of service provision to those identified needs, robust performance monitoring and outcomes measurement, and effective inter-departmental working are central to addressing these issues (North Harbour Consulting, 2011; NIHE, 2012; NIHE, 2012a; DSD, 2015; RSM McClure Watters, 2015; Boyle *et al.*, 2016; Fitzpatrick *et al.*, 2016; Boyle and Pleace, 2017; NIHE, 2017; Watts and Fitzpatrick, 2017). Yet, although sequential reviews and evaluations of strategic approaches to homelessness in Northern Ireland have commended the effort expended in seeking progress on these key factors, truly effective and impactful outcomes remain to some extent illusive (North Harbour Consulting, 2011; DSD, 2015; RSM McClure Watters, 2015; Boyle *et al.*, 2016; Watts and Fitzpatrick, 2017). In the most recent Northern Ireland 'Homelessness Monitor', Fitzpatrick *et al.* (2016) concluded that the "overriding impression one forms in studying homelessness and related policy developments in Northern Ireland is that of stasis combined with frantic activity" (p.66), a sentiment strongly echoed in the findings of Boyle and Pleace's (2017) evaluation of the 2012-17 homelessness strategy:

> Gaps remained in service provision and progress in delivering the Strategy had not always been rapid, including the development of preventative services. Better service coordination and interagency planning were not yet fully in place and the social blight of rough sleeping, while rare, was yet to be eradicated (p.5).

It is against this backdrop of enduring policy attention, but limited progress, that the NIAO report on homelessness should be understood.

The Scale and Nature of Homelessness in Northern Ireland

The first section of the Northern Ireland Audit Office report outlines the statutory responsibility of NIHE, the way in which this responsibility varies from those of other UK jurisdictions, the amount of public funding expended on homelessness, and the nature and scale of homelessness in Northern Ireland. With respect to the latter, the NIAO highlights a number of key trends in homelessness, including the broad stability in levels of homelessness and repeat homelessness presentations, and also the high rate of statutory homelessness acceptances in NI compared to those seen in Great Britain. Operationally, NIHE is administered across three distinct geographical areas: namely, Belfast, South and North. The report notes a variance (over the last five years) in the rate of increase in statutory homeless acceptances across these regions, with a 23 per cent increase in acceptances in the South region, a 13 per cent increase in the North region, and an 11 per cent increase in the Belfast region. The report also notes that 'accommodation not reasonable' is the most common reason for statutory homelessness acceptances in NI and that the numbers becoming homeless for this reason have increased consistently since 2011/12.

In considering the factors likely to explain the higher rate of statutory homeless acceptances in NI compared to the rest of the UK, the NIAO report notes that Northern Ireland has been particularly late to adopt a Housing Options approach to homelessness prevention and as such has not benefited from the reduction in acceptances evident elsewhere in the UK. Furthermore, the report recognises that a local administrative variance whereby the rehousing of older people takes place via the statutory homelessness route, often under the accommodation not reasonable category, perhaps inflates homelessness figures compared to those of other UK nations who deal with rehousing this group differently. In Northern Ireland, social lets are allocated on the basis of points awarded for housing need, and the report takes cognisance of NIHE's suggestion that the social housing allocation scheme in NI may function in a way which incentivises homelessness presentations, in so far as it awards a higher number of points to homeless households. Other factors recorded within the NIAO report include the post conflict status of Northern Ireland, with the associated higher level of physical and mental health vulnerabilities within the general population perhaps giving rise to a higher proportion of households who meet the conditions for 'priority need' status; and the large proportion of social housing segregated along religious lines, with the associated complicating impact this has on housing allocation policy and practice.

While the NIAO report acknowledges the potential validity of these propositions, it ultimately concludes that current analysis, interpretation, and presentation of homelessness data in Northern Ireland does not allow for their definitive substan-

tiation. This finding closely echoes those of Fitzpatrick *et al.* (2016), who posit that "one seeming constant on homelessness in Northern Ireland is very poor data availability, which hampers both efforts to track trends over time and comparisons with Great Britain" (p.67). The first and only recommendation within this section of the NIAO report is that in order to fully understand the causes of homelessness, NIHE should carry out research to establish why levels of statutory homeless acceptances are significantly higher than elsewhere in the UK, the reasons for variation in acceptances across NIHE's three regions, and the nature of presentations under the accommodation not reasonable category. This recommendation reinforces the most recent homelessness strategy in NI which commits to a renewed and enhanced focus on the measuring and monitoring of existing and emerging need within the homeless population (NIHE, 2017). The first NIAO recommendation, then, places a welcome additional emphasis on the development of a clearer, evidence-based understanding of homelessness trends in Northern Ireland and the centrality of this understanding to the prevention and mitigation of homelessness.

Despite this welcome emphasis, the NIAO report's own account of homelessness causation and trends is itself problematic. Part one of the report opens with the assertion that "homelessness is a complex societal problem", and continues by suggesting that "homelessness can affect anyone in society" (p.10). By way of exemplifying these assertions, the auditor directs the reader to the following case example:

> Rick was once the owner of three successful businesses, but his life changed when the recession hit and within a few months he'd lost everything. Rick found himself sleeping rough on the streets of Belfast and was approached by… street outreach volunteers who were able to offer practical advice and immediate assistance. Within days Rick had a hostel bed. A local radio journalist picked up on his story and a local businessman, who was listening, decided to arrange an interview with a Belfast hotel. Rick got the job (p.10).

The nature of this framing of homelessness as complex and homelessness risk as distributed right across the population is problematic, however, in light of the wider evidence base on homelessness causation. In a recent article drawing on three household survey datasets, Bramley and Fitzpatrick (2018) demonstrate that:

> in the UK homelessness is not randomly distributed across the population, but rather the odds of experiencing it… for some systematically disadvantaged groups is so high that it comes close to constituting a 'norm'. Conversely, for others, the probability of falling into homelessness is slight in the extreme because they are cushioned by many protective factors (p.112).

Their analysis "emphatically underlines the centrality of poverty to the generation of homelessness" (p.113), and as such, the authors argue that statements which define homelessness as a complex phenomenon that can affect anyone risk creating the entirely false impression that the causes of homelessness "are largely unfathomable, and that attempts at prediction and prevention are doomed to failure" (p.1). On the contrary, however, homelessness is in fact a largely predictable and predominantly structural problem with childhood poverty emerging clearly as the most powerful predictor of adult homelessness. These findings have very clear implications for policy and practice, i.e. that interventions should be targeted towards known causal drivers of homelessness, including poverty (Bramley and Fitzpatrick, 2018).

In their recent report *Reframing Homelessness in the United Kingdom*, the FrameWorks Institute rejects the proposition that the idea of 'universal homelessness risk' has any strategic or communicative advantages, even if it is demonstrably empirically false. They find that such a framing is largely unhelpful to the general public, failing to expand their knowledge of the types and causes of homelessness, evoking a sense of paralysis and fatalism rather than a sense of optimism about solutions: if homelessness is a random and arbitrary phenomenon, then it would seem to follow that prevention measures are somewhat futile (Nicholas *et al.*, 2018). Perhaps most importantly, the FrameWorks Institute found that the 'we're all two pay checks away from homelessness' message:

> simply does not ring true to members of the public when they begin to think it through. Instead, this claim appears to conflict with people's lived experience of inequality, and their recognition that some people are not at real risk of becoming homeless because they will always have the necessary resources and social supports (p.15).

The NIAO report's opening statements and accompanying exemplar – which present homelessness as likely to effect wealthy businessmen and resolved through the beneficent interventions of strangers – are thus deeply unhelpful, particularly given the report's own emphasis on promoting an evidence-based response to homelessness.

Monitoring and Reporting of Progress in Delivery of the Strategy

The second section of the Northern Ireland Audit Office report focuses on the monitoring and reporting of progress on the 2012-17 homelessness strategy, which proposed to eliminate long term homelessness and rough sleeping across Northern Ireland by 2020 through four strategic objectives: enhanced homelessness prevention; reducing the duration of homelessness by improving access to affordable housing; removing the need to sleep rough; and, improving services for vulnerable homeless households and individuals (NIHE, 2012). The NIAO report concludes that the strategy was hampered by two key ambiguities in its conceptual framework: first, long-term homelessness was not clearly defined; and, second, the target date for achieving the principal aim of the strategy was set beyond its own term. Alongside these fundamental issues, the NIAO report also points to a number of concerns regarding the monitoring and evaluation framework underpinning the strategy. Of particular note, the singular key performance indicator (KPI) and six associated sub-indicators by which progress of the strategy was to be monitored, were found by NIAO to be inadequately linked to high-level expected outcomes, with no evidence of baseline or benchmark data being developed against which progress might be measured. Indeed, the sub-indicators by and large focused on individual initiatives, rather than defined outcomes, and, as such, the contribution of each initiative to the overall progress of the strategy was not fully demonstrable. Alongside the singular KPI and associated sub-indicators, the strategy also detailed 38 individual actions, which were viewed as laudable in terms of ambition but ultimately difficult to measure and evaluate, again on account of their lack of clearly defined and measurable outcomes. Finally, the NIAO report notes that difficulties in terms of measuring progress were further compounded by the introduction of a number of significant revisions during the strategy's duration. First, the homelessness strategy was subject to a substantive reprioritisation in 2014 to allow for five new key priorities – the introduction of the Housing Options model, a Common Assessment Framework, and a Central Access Point, the development of a Housing First service, and a number of measures designed to support sustainable tenancies. Then, in 2015/16, two new KPIs were introduced: to decrease the number of homeless presenters; and, to reduce the average length of time homeless households spend in temporary accommodation.

The NIAO report acknowledges the considerable progress made towards the completion of the thirty-eight actions detailed in the 2012 strategy and applauds the efforts expended to prevent and reduce homelessness during its term, particularly in respect to individual initiatives. However, the report ultimately concludes that the strategy had limited success in reducing homelessness, pointing to a significant increase in statutory acceptances and – notwithstanding a recognition

of the reduction in length of stay in temporary accommodation from 46 to 39 weeks – an overall increase in temporary accommodation placements per annum, with lengthy stays for many households. The Audit Office report also notes considerable uncertainty regarding progress toward the intended objective of homelessness prevention, pointing to a paucity of data regarding the number of households who have successfully been prevented from becoming homeless via NIHE and partner organisation initiatives.

The need for clear, measurable targets for reducing homelessness in Northern Ireland and for meeting the needs of homeless presenters was identified as early as 2004 in recommendations made by the Westminster Public Accounts Committee (House of Commons, 2004). It is a theme which has recurred for more than a decade, through numerous evaluations and reviews of the performance of both the NIHE and Supporting People in Northern Ireland. An early strategic review of temporary accommodation in NI identified significant variation in the performance of temporary accommodation schemes and recommended an urgent need for "a system of funding for temporary accommodation that depends on achieving minimum performance standards" (North Harbour Consulting, 2011, p.8). The *Housing Related Support Strategy 2012-2015* further echoed these recommendations, committing to the development of a framework for outcomes monitoring, "with the data arising from this being used to inform future service improvement and development" (p.37). *An Evaluation of Accommodation Based Services Funded by Supporting People*, published in 2015, revisited the same theme, noting an urgent need for Supporting People to develop appropriate service performance and outcome measures. Also in 2015, the *Supporting People Review* noted that:

> it is difficult to reach a firm overall assessment as to whether the programme has met needs adequately, primarily because there is currently no systematic, robust process for assessing housing support needs at a regional level. The individual case studies highlighted throughout the report, and other commissioned research, provide persuasive anecdotal evidence of needs being met, but no objective mechanism exists to verify that this is indeed the case (p.16).

The *Supporting People Review* (2015) makes clear the need for a new strategic, intelligence-led approach to needs assessment in order to identify current and future patterns of need, and for a revised approach to outcomes measurement that would allow for more robust and meaningful performance monitoring. Likewise, the new *Homelessness Strategy for Northern Ireland* (2017) places a very strong focus on data gathering and evaluation, with two of the strategy's five objectives being dedicated to ensuring that the right mechanisms are in place to oversee the strategy's effective implementation and inform the development of appropriate services (NIHE, 2017; Watts and Fitzpatrick, 2017). The four recommendations made by the

Audit Office under this section – clear objectives and KPIs, regular progress reports, robust data collection on the outcome of partner organisations, and the expansion of data sets collected and published – thus lend yet more weight to enduring demands to improve monitoring processes, evident in both the Supporting People review (2015) and new homelessness strategy (2017).

Concern persists, though, with regard to a lack specificity regarding how the objectives of the Northern Ireland homelessness strategy (2017) will be attained. Of the strategy's four overarching indicators – homelessness presentations; average length of stay in temporary accommodation; full duty applicant duties discharged; and, levels of repeat homelessness – the baseline position is provided for only two of these: namely, presentations and average length of stay (Watts and Fitzpatrick, 2017). As Watts and Fitzpatrick note in *Ending Homelessness Together in Northern Ireland: A Unique Challenge*: "getting these monitoring systems right, and establishing a clear baseline position against which to judge progress, will be crucial to establishing an effective incentive structure to support delivery of the strategy" (p.13). This point also stands in relation to the monitoring and evaluation of the Supporting People Programme, and the development of a robust framework for sharing of data between NIHE and Supporting People in order to inform the strategic planning of services. Given that the need for improved monitoring and evaluation has been widely acknowledged for more than a decade, while progress has remained stilted and elusive, it remains to be seen whether the NIAO's most recent intervention will be successful in swinging the balance towards a constructive resolution of this stubborn problem. The report itself is unequivocal in noting that the NIAO's previous report did not prompt the level of change originally anticipated:

> Our previous report on homelessness in 2002 highlighted a number of short-comings relating to management and costing information. It is unacceptable that 15 years on, shortcomings still persist. Linking cost information to activities and outcomes is important to decision making and the NIHE Board and the Department cannot demonstrate that value for money has been achieved without this financial information (p.27).

The report highlights a number of opportunities for NIHE to improve its management information going forward, including the roll-out of the Housing Solutions and Support approach (Northern Ireland's version of the wider UK's preventative Housing Options model); the proposed development of a new customer management system, and the commitment within the current homelessness strategy to examine homelessness trends and develop new measures. What the report perhaps lacks is a clear exposition of the root cause of Northern Ireland's sluggish progression toward robust monitoring, evaluation and, by extension, transparency

and accountability. A number of key informants to the *Homelessness Monitor Northern Ireland 2016* suggested that the relative paucity of published data on homelessness in Northern Ireland is "a deliberate policy position, reflecting 'over-sensitivity' about data release" (p.67). Whether this is indeed the case remains unclear, but what is evident is that in seeking to progress monitoring and evaluation of homelessness, full consideration must be given to the casual factors underpinning an historical lack of progress in this area.

Reducing Demand and Increasing Supply

The third section of the NIAO report explores the efficacy of measures taken by NIHE to reduce housing demand and increase housing supply in Northern Ireland. In so doing, the report looks at a broad range of topics, including: tenancy sustainment; the Housing First approach; the role of Housing Solutions and Support (HSS); social housing supply; accessing the private rented sector; and use of temporary accommodation. The report opens with a consideration of the importance of sustaining existing tenancies, noting the financial and social cost of tenancy breakdown, and highlighting the centrality of housing advice and mediation services to prevention. A particular emphasis is placed on the fact that social housing in Northern Ireland is allocated unfurnished, with the report identifying this as representing a recurring tenancy failure risk and urging NIHE to carefully consider "if the provision of furnished NIHE accommodation would help reduce cases of homelessness" (p.34).

The report briefly highlights the recent development of Northern Ireland's only Housing First service, where rapid provision of permanent housing coupled with access to flexible support bypasses or significantly reduces the need for traditional forms of (usually congregate) temporary and supported accommodation (Boyle *et al.*, 2016; Padgett *et al.*, 2016). The report details the positive outcomes attained by the service, the value for money it represents, and provides an exemplar case study documenting the benefits of Housing First in terms of tenancy sustainment, social inclusion, and improvements in self-esteem. It acknowledges concerns within the sector regarding the availability of sufficient 'wrap around' support to ensure the successful delivery of Housing First, noting the strong preventive benefits of floating support services and the Department for Social Development's recommendation in 2015 that such services should be expanded (DSD, 2015). While this acknowledgement is welcome, the brevity with which Housing First is considered in the NIAO report is notable. It reflects the rather muted commitment of the new homelessness strategy (2017) to, "examine the potential for other Housing Led Pathway Models for chronic homeless clients (subject to available funding)" (p.27). This stands in stark contrast with England

and Scotland, where the rapid rehousing and Housing First agendas are being pursued much more robustly (Fitzpatrick *et al.*, 2015; Fitzpatrick *et al.*, 2017; Homelessness and Rough Sleeping Action Group (HRSAG), 2018).

Against this background, it is of some interest that the report draws upon a singular third sector informant quote in regards to the efficacy of Housing First. It states: "supported housing is suitable for some but Housing First will not work for an individual with many complex needs" (p.35). In a similar vein, the report's discussion of temporary accommodation includes the following third sector quote: "there will always be a need for half way house [hostel] accommodation as many households are not equipped to live independently" (p.41). The inclusion of these quotes risks presenting hostel accommodation as an almost unavoidable aspect of homelessness for those with more complex need, while simultaneously obfuscating the centrality of Housing First to the resolution of homelessness for this particularly vulnerable group. Mackie, Johnsen and Wood, in *Ending Rough Sleeping: What Works* (2017) note that "despite their widespread use, H&S [hostel and shelter accommodation] are not an inevitable part of the homelessness response, as evidenced by their absence in Finland – one of the few countries where homelessness is decreasing" (p.28). Given the report's focus on evidence-based interventions and the prevention of tenancy breakdown, it seems particularly inconsistent that the overwhelming body of evidence which supports the efficacy and cost effectiveness of Housing First and housing-led approaches to homelessness, *particularly* for those with complex needs, should not be given greater prominence and influence on the Auditor's recommendations (Woodhall-Melnik and Dunn, 2015; Boyle *et al.*, 2016; Padgett *et al.*, 2016).

The NIAO report also notes that NIHE have actively sought to reduce housing demand by placing greater emphasis on the prevention of homelessness, pointing to the recent introduction of a Housing Options approach delivered via Housing Solutions and Support Teams, as *the* key initiative in this area. The report notes that an internal NIHE evaluation of all HSS cases – from August 2014 to March 2016 – records more than 10 per cent of customers as being helped to sustain their current tenancy or having their homelessness prevented, and over 13 per cent of customers as being supported to access housing in the private rented sector. The evaluation also reports an additional 37 per cent of customers being rehoused in social housing, primarily as a result of endeavours to encourage customers to select areas where they have "realistic prospects" of being allocated a property (p.36). Interpretation of these clearly positive results could perhaps have recognised the risks associated with persuading households towards areas of lower demand, including of pooling those with experience of homelessness in areas with higher levels of anti-social behaviour or less desirable accommodation. This is potentially

significant in terms of heightening the probability of tenancy breakdown and it is important that such actions do not undermine initiatives directed toward tenancy sustainment and the reduction of repeat homelessness.

Also of note, in this context, is the absence within the NIAO report of reference to learning from elsewhere in the UK with regards to the effective implementation of a Housing Options approach. Preventative initiatives in England and, to a lesser extent, in Scotland have demonstrated a need to guard against illegal 'gatekeeping', whereby a focus on the proactive prevention of homelessness precludes or presents barriers to a full homelessness assessment, and thus denies access for those who are homeless or threatened with homelessness to their statutory entitlements under homelessness legislation (Pawson, 2007; Scottish Housing Regulator, 2014; Watts and Fitzpatrick, 2017). This is particularly pertinent in the Northern Ireland context where prevention work remains outside the statutory homelessness framework (unlike England and Wales) and the priority need test still operates (Fitzpatrick *et al.*, 2016). As Watts and Fitzpatrick note, "there may be a strong incentive for Housing Solutions and Support teams to focus their non-statutory prevention efforts on 'priority need' households who will be owed the full rehousing duty if preventative efforts fail" (p.9). Housing Rights (a housing advice organisation in Northern Ireland) have further suggested that the 'reason to believe' threshold included in the Housing (Northern Ireland) Order 1988 – whereby a homelessness assessment is triggered when "the Executive has reason to believe that he [the applicant] may be homeless or threatened with homelessness" – creates a level of ambiguity which could allow for the intent of the Housing Solutions approach to be undermined (Housing Rights, 2016). They have called for "guidance to be issued to the Housing Executive on how to balance its potential duty to make a formal housing assessment in the context of the Housing Solutions model", drawing on the precedent already set in the wider UK context where similar guidance has been issued by Scottish Government (Housing Rights, 2016, p.8). That the NIAO report does not engage directly with this important and potentially impactful issue will come as a disappointment to many.

With regards to social housing supply in Northern Ireland, the NIAO report notes a significant deficit against planned new build social housing and the compounding impact of the loss of social housing via the House Sale Scheme (Right to Buy). It also notes, as outlined above, that approximately 80 per cent of social homes let each year in Northern Ireland are allocated to households that are statutorily homeless, with this figure being significantly higher than elsewhere in the UK. Furthermore, the number of households on the waiting list for social housing has remained above 35,000 since 2006, with many households remaining on the waiting list for lengthy periods (DfC, 2017b; NIAO, 2017). The NIAO conclude that dependence on social housing to "provide a solution for homeless households" has

contributed to the consistently high numbers on the waiting list and in light of this, and the ongoing upward trend in statutory homelessness acceptances, urges the NIHE to "consider carefully the long term sustainability of continuing to discharge its duty through the social housing sector only" (p.38).

This is in keeping with a recent consultation on proposals for the *Fundamental Review of Social Housing Allocations* in Northern Ireland, which posits that the NIHE should meet their duty to homeless applicants on a 'tenure neutral' basis (DfC, 2017). Such reforms would follow moves taken in England, Wales and Scotland (albeit to different degrees) to enable local authorities to discharge their homelessness duties into the private rented sector (PRS) (Wilson and Barton, 2018). Discharge of duty into the PRS also poses a number of challenges, alongside opportunities to increase the 'flow' of households through the statutory homelessness system, specifically in relation to both affordability (PRS rents are significantly higher than in the social housing sector, and security deposit and rent in advance are standard) (Ellison *et al.*, 2012; DfC, 2017c) and security (with the ending of private tenancies now the primary cause of homelessness in England) (Fitzpatrick *et al.*, 2018). Moreover, and as the NIAO report later notes, Northern Ireland's only private rental access scheme, SmartMove, has experienced considerable difficulty in securing access to appropriate and affordable PRS housing. Yet, this difficulty is not expressly considered by NIAO alongside its exhortation towards tenure neutral discharge. This is disappointing given the wider UK context where a precedent has already been set in this regard, with all other jurisdictions introducing notable safeguards alongside movement toward increased PRS discharge. More promising is the inclusion of safeguards concerning 'reasonableness', 'standards' and 'security' included in the Department for Communities consultation document (DfC, 2017). That the NIAO report does not provide comment on the centrality of these safeguards to the prevention of homelessness is notable.

Despite this focus on the PRS, the NIAO does highlight the "importance of continued commitment to investment in new social housing, sustaining existing social housing stock numbers, and a need to make alternative affordable solutions available" (p.38). Given the centrality of a sufficient supply of affordable and appropriate housing to both the prevention and resolution of homelessness, these observations are of particular import. It is notable, then, that the NIAO report largely restricts the remainder of this section to "making best use of *existing* housing stock" [emphasis added] (p.38). No doubt the NIAO's review of measures to address social housing tenancy fraud, to manage voids in social homes, to return empty properties to use, and to increase access to the PRS, are both welcome and relevant, albeit that they lack any recommendation regarding successful progression of these initiatives. But what appears to be lacking entirely is a clear position with regards to how invest-

ment in new social housing might be attained. While the report acknowledges that the number of new build starts is dependent upon the availability of funding, the lack of a clear call for further investment in new social housing is disappointing.

NIAO's consideration of demand and supply issues closes with an exploration of temporary homelessness accommodation. It notes four key areas of concern: first, there is a need to further reduce the use of Bed and Breakfast accommodation, particularly for families with children; second, the NIHE's commitment to develop a Central Access Point has not been achieved and, as such, the issue of inappropriate temporary accommodation placement persists; third, there is significant variation in the cost of temporary accommodation provision, with limited understanding of or rationale for this variation; and, fourth, a significant number of households spend prolonged periods in temporary accommodation, with these stays being suggestive of a lack of suitable move-on options. Missing from the report is attention to the key issue that the current portfolio of TA in Northern Ireland has remained fairly static while service user need has changed over time, giving rise to widely acknowledged gaps and misalignment in service provision (North Harbour Consulting, 2011; NIHE, 2012; NIHE, 2012a; DSD, 2015; RSM McClure Watters, 2015; Boyle *et al.*, 2016; Boyle and Pleace, 2017; NIHE, 2017; McMordie, 2018). A lack of clarity regarding the nature and extent of need within the homeless population has hampered ability to align services at a strategic level and – by extension – the ability to make appropriate placements at individual service user level (DSD, 2015; Boyle and Pleace, 2017; McMordie, 2018). A lack of affordable and appropriate permanent accommodation prevents timely move-on for those deemed 'housing-ready', effectively stymying the system and enhancing the probability of placement based on availability rather than need (NIHE, 2012; NIHE, 2012b; Council for the Homeless Northern Ireland (CHNI), 2013; DSD, 2015; Boyle and Pleace, 2017; NIAO, 2017; McMordie, 2018). Finally, a paucity of data regarding the extent of planning for move-on from TA, and the efficacy of these plans where they do exist, impedes actions intended to ease this 'congestion' (North Harbour Consulting, 2011; RSM McClure Watters, 2015; Boyle *et al.*, 2016; NIAO, 2017). While the NIAO report highlights some aspects of these key areas of concern, it fails to fully explicate them and their combined impacts on households accessing TA in Northern Ireland. Perhaps most importantly, NIAO does not note a key failing of the 2012 homelessness strategy, that is the lack of progress made toward meeting the NIHE commitment to a fundamental review of the temporary accommodation portfolio in Northern Ireland (NIHE, 2012; Fitzpatrick *et al.*, 2016; Boyle and Pleace, 2017).

Given the centrality of the issues discussed within this section to the generation and resolution of homelessness, and the acknowledgement of NIAO that successful approaches to homelessness rest upon decreasing demand and increasing supply, it is curious that the auditor should settle upon a singular recommendation: "that

an annual report is submitted to the NIHE Board which presents a summary of expenditure and benchmarked cost data demonstrating that accommodation-based services provide value for money" (p.43). While this is undoubtedly an important recommendation in and of itself, in its singularity it seems to neglect recommendations that might go some way toward addressing the more complex and pressing issues evident within the Northern Ireland context.

Homelessness is more than a Housing Issue

The final section of the Northern Ireland Audit Office report covers three key themes: interdepartmental working; homelessness and health; and, rough sleeping. The auditor begins by outlining the importance of interdepartmental working to the prevention and resolution of homelessness, noting that considerable effort has been made to progress work in this area. A cross-sectoral working group, The Promoting Social Inclusion Partnership (PSI), was established by the Department of Social Development in 2004. In 2007, the partnership published *Including the Homeless – A Strategy to Promote the Social Inclusion of Homeless People and those at Risk of Becoming Homeless in Northern Ireland*. The strategy acknowledged that homelessness is one of the most extreme forms of social exclusion and committed to a cross-sectoral and cross-departmental approach to promoting social inclusion, including specific targeting of more vulnerable homeless households. During this time, inter-departmental working was also granted greater weight through the Housing (Amendment) Act 2010, which required a number of different government departments and public sector organisations to take the homelessness strategy into account when exercising their functions (Housing Rights, 2016; NIAO, 2017). Following an internal NIHE review in 2014, the PSI partnership was replaced by an inter-agency Homelessness Strategy Steering Group (HSSG). In reviewing the work of the group, the NIAO report concludes that departmental representatives "did not always have sufficient seniority, with the ability to influence and make timely strategic decisions" (p.46). This assessment of interagency working echoes the findings of successive reviews and evaluations which highlight ongoing failures in effective joint planning as a central factor in the curtailment of effective responses to homelessness in general and full implementation of the 2012-17 homelessness strategy in particular (Boyle and Pleace, 2017; Fitzpatrick *et al.*, 2017; Watts and Fitzpatrick, 2017).

The NIAO report makes several observations and suggestions in respect to how effective interdepartmental working might be attained. In particular, it highlights the transformative potential of the Northern Ireland draft Programme for Government 2016 -21 which, in adopting an outcomes-based methodology designed to ensure clearer links between policies and programmes, provides a framework which

should facilitate rapid progress in this area. The Executive Office and Department of Finance are noted as central to this process, being described by NIAO as well positioned with respect to embedding outcomes-based accountability and inter-departmental working across all departments. What is missing in the NIAO account is an acknowledgement of the wider political situation in Northern Ireland and, in particular, the absence of a functioning Northern Ireland Assembly. The NIAO report, in urging the HSSG "to reposition itself to ensure it provides strategic leadership and works with Government to effect positive change" (p.46) without acknowledging the very absence of that Government, appears to ignore the inherent difficulty in progressing policy change against a background of long-running political instability.

A pertinent example of this difficulty can be traced in a consideration of the NIAO's observation regarding cross-departmental action on homelessness:

> Until homelessness is a strategic priority for all the relevant departments and agencies in Northern Ireland it will continue to be viewed mainly as a housing issue and suffer because of conflicting priorities (p.47).

In late 2016, Nichola Mallon (Member of the Legislative Assembly) tabled a Private Members Bill which, amongst other proposals, would "place a statutory duty to co-operate" on relevant statutory bodies (Housing Rights, 2016, p.1). In their commentary, Housing Rights made clear that this move had the potential to break through the impasse that has limited effective joint working to date:

> Housing Rights is mindful of the time and resource constraints increasingly facing providers of housing, healthcare and other support services. It is natural that under such constraints, such bodies prioritise those duties which they are statutorily obliged to carry out. A statutory duty to co-operate will ensure that those bodies with responsibilities in relation to homelessness, are able to appropriately prioritise their time and resources to tackle homelessness (p.2).

The Bill fell when the Northern Ireland Assembly collapsed in January 2017.

Leading on from the report's discussion of inter-departmental working, the NIAO turn to a specific consideration of the interconnected nature of health and homelessness, and by extension the role of health and social care services in addressing the needs of homeless households. A number of concerns are highlighted as arising from third sector informants to the audit, with a particular emphasis on ongoing challenges regarding access to detoxification facilities and mental health services, and a general need for "increased commitment, collaboration, and targeted intervention from the Health sector" (p.50). This is in keeping with the findings of Fitzpatrick *et al.*'s (2016) work monitoring homelessness in Northern Ireland, which identified a lack of commitment from the Department of Health as one of the key

failures of inter-agency working on homelessness. The key recommendation of the NIAO in respect to homelessness and health places a very welcome emphasis on the need to fully understand the health needs of the homeless population:

> We recommend that an in-depth cross-departmental review is jointly commissioned to identify and quantify health-related support needs for homelessness service providers and homeless households across Northern Ireland (p.50).

It is, however, true that a considerable body of evidence already exists with regards to the health needs of the homeless population, in an international and UK context, but also in the context of Northern Ireland itself (CHNI, no date; CHNI, 2013; Homeless Link, 2014; Echo Steering Group, 2015; Patient and Client Council, 2015; Aldridge *et al.*, 2018). That the review recommended by NIAO is cross-departmental in nature and jointly commissioned is to be commended, in so far as it offers the prospect of departmental buy-in at point of inception. What will be central though to the effective progression of inter-departmental working, is the extent to which the findings of the recommended review are utilised to bring about improved outcomes for homeless households.

Under this section the NIAO also consider rough sleeping in Northern Ireland. The report notes a succession of rough sleeper deaths in the Belfast area in 2015/16 and the subsequent establishment of a Tri-Ministerial Group (comprising the Ministers for Communities, Health and Justice) to explore and address the issue of street homelessness. While NIAO note the group's determination that inter-departmental collaboration should be increased, they fail to acknowledge the necessary loss of impetus behind this collaboration following the collapse of the Northern Ireland Assembly.

Perhaps more important is the partial account of the causes of rough sleeping provided by the NIAO report. In summarising the findings of the *Belfast Street Needs Audit* (2016), the report identifies the main reasons for not accessing crisis accommodation as: lack of available crisis beds; exclusion as a result of previous challenging behaviour, fighting and criminal history; exclusion due to access criteria, for example, presenting as inebriated; and, affordability (linked to addiction and/or previous service charge arrears). In fact, the reasons listed by NIAO are those detailed in the *Street Needs Audit* as arising from the perspective of service *providers*. While these barriers are undoubtedly relevant, those given in the *Belfast Street Needs Audit* as arising from the perspective of service *users* have a distinctly different emphasis. They are as follows:

• Problems with other residents, including drug and alcohol use, violence, theft, bullying, noise and arguments and feeling unsafe.

• Substance users making it difficult for the individuals identified to tackle their own substance misuse problems.

• Overcrowding, a lack of bed space, and sharing rooms or limited facilities with others, and

• Rules, in particular around curfews, that were considered unnecessarily restrictive (p.14).

Here, it is the experience of living in temporary accommodation that emerges as the key barrier to accessing services. In *Ending Rough Sleeping: What Works?* (2017) Mackie, Johnsen and Wood discuss the prevalence of this phenomenon across the United Kingdom and beyond:

> Evidence indicates consistently that many (and perhaps the majority of) homeless people find H&S [hostel and shelter accommodation] intimidating or unpleasant environments. Some choose not to use H&S due to fears around personal safety and/or pessimistic views regarding their helpfulness in terms of offering a route out of homelessness (p.30).

It is regrettable – and significant – that the views of those rough sleeping should be excluded from a consideration of factors contributing to street homelessness in Northern Ireland. The reasons cited by NIAO tend to allocate responsibility to the individual who is rough sleeping and, by extension, to locate the locus of change as resting outside the control of homelessness service provision. In stark contrast, the reason cited by service users firmly locate the drivers of rough sleeping as arising from previous negative experiences within temporary accommodation, and thus locate the locus of change as resting firmly within the remit of homelessness policy and practice. It is vital, if chronic homelessness is to be adequately addressed in NI, that full consideration is given to seeking prompt resolution to the core issues cited by users of homelessness services.

Conclusion

What is clear from a consideration of responses to homelessness in Northern Ireland is that key points of consensus exist with regard to how effective prevention and resolution of homelessness might be achieved. The need for robust monitoring and evaluation processes, enhanced inter-departmental working, and fundamental realignment of homelessness service provision, has long been acknowledged and accepted within the sector. Yet, despite the notable efforts made in terms of seeking to address these core issues, progress has been both stilted and slow. The NIAO report makes a valuable contribution to the debate on homelessness in Northern Ireland, in that it reaffirms and lends weight to the existing body of evidence regarding the nature and form of some of the issues which hamper progress. Yet, the report is lacking in two key respects. First, it does not provide a robust and clear exposition of why these issues persist in NI with such seeming intransigence, and in this regard, it remains to be seen whether the NIAO intervention will be *the* intervention which proves sufficient to inspire real progress. Second, it fails to explore and provide recommendations on imminent changes to homelessness service provision in Northern Ireland, most notably recommendations which might safeguard the intent of the Housing Solutions and Support approach to homelessness prevention and the proposed move toward discharge of statutory duty on a tenure neutral basis. Perhaps most significantly, the NIAO recommendations are relatively muted and limited in terms of the extent to which they address the core issues identified by the report. In this respect, it is unlikely that the report itself will inspire the radical change in approaches to homelessness evident elsewhere in the UK and sorely needed in Northern Ireland.

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