



## Voluntary Sector Housing Policy Forum

### **Voluntary Sector Housing Policy Forum (VSHPF) paper on DWP public consultation: 'Housing Benefit Reform – Supported Housing'**

The Voluntary Sector Housing Policy Forum (VSHPF) is an open network of voluntary sector organisations that have an interest in housing legislation and policy. VSHPF representation consists of core housing and homelessness organisations working in the Community & Voluntary sector throughout Northern Ireland. The VSHPF aims to enhance the capacity of the voluntary and community sector to make policy responses and influence policy development in housing and homelessness.

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## Housing Benefit Reform – Supported Housing

The Voluntary Sector Housing policy forum in responding to the Department for Work and Pensions (DWP) consultation on *Housing Benefit Reform – Supported Housing* would like to initially indicate that this consultation applies to England, Scotland and Wales. The consultation does not apply to Northern Ireland and as such the proposals within the consultation paper do not reflect the working systems and the Housing Benefit context currently existing within Northern Ireland.

**The way in which Housing Benefit assists those living in supported housing within the social and voluntary sector with their rent is different in Northern Ireland to the rest of Great Britain (GB). This is a fundamental principle to bear in mind when considering how suitable these proposals are in relation to the Northern Ireland housing system.**

There are a number of general points to make in relation to the different operating environment for supported housing in Northern Ireland:

- One of the drivers behind the DWP proposals is to reduce unnecessary complexity in the housing benefit system for those in supported housing. However, the system in Northern Ireland is working well, with rental levels much lower than in GB and the administration of Housing Benefit is normally timely and efficient in comparison to GB.
- The Northern Ireland Executive has taken a much welcome decision to ring-fence Supporting People funding. This has not been the case in England and Scotland (Wales have introduced a partial ring-fence) and the budget for Supporting People has been subsumed within local authority budgets.
- The proposals, within the document, are based on local authority processes and the responsibility of local authorities in GB for housing and social services. In Northern Ireland these functions are managed by the Department for Social Development, Northern Ireland Housing Executive, Department of Health, Social Services and Public Safety and area health trusts, thus making implementation of the proposals more challenging (Paragraphs 24, 26 & 55) and increasing the complexity of the systems, not reducing them.
- The consultation does not recognise or acknowledge that approaches to the management of personal budgets, 'other

Government funding streams’ and supported housing delivery are different within the devolved administrations and local authorities in England. (Paragraph 33)

- The ‘other Government funding streams’ referred to in the consultation are relevant in England, but may not have equivalent funding streams within the devolved administrations. (Paragraph 53)

On this basis, the Voluntary Sector Housing Policy Forum (VSHPF) would suggest that strong consideration be given to how suitable the consultation proposals are within the Northern Ireland context and whether it is reasonable to overhaul a system that is working well in order to bring it into line with the English model. Given that another key driver behind the consultation on Housing Benefit Reform – Supported Housing is to accommodate payment through Universal Credit, this reinforces the argument that housing costs should be disaggregated from Universal Credit to allow a more sensitive approach to the complexity of housing and need.

The Department for Social Development (DSD) has advised all stakeholders in Northern Ireland that, although the Minister for Social Development has not as yet taken a view on these proposals, “any views or comments put forward by respondents in Northern Ireland will be passed to the Department for Work and Pensions for consideration”. We welcome the fact that DSD is raising awareness of this consultation and the need to respond but have some concerns around how responses from Northern Ireland can be taken into account given that the consultation does not apply to Northern Ireland.

We appreciate that the Housing Benefit system is broadly the same in Northern Ireland as in the rest of GB, but it is administered differently and has different working systems, the local government and housing structures are significantly different in Northern Ireland and housing support is also provided differently. Therefore the consultation questions may not translate to the Northern Ireland context and respondents from Northern Ireland may not be in a position to adequately raise the issues that would determine how these proposals work in practice in Northern Ireland.

Further to the outcome of the DWP consultation, if the decision is taken to introduce the proposals for change in Northern Ireland, the VSHPF would suggest that separate consultation in Northern Ireland may be necessary to refine the proposals in light of the different administrative system and funding arrangements. **We would therefore ask for recognition that the operation of the Housing Benefit System for**

**supported housing in Northern Ireland is considerably different to that within the rest of the United Kingdom and because of this we recommend that the implementation of the draft proposals should be postponed until a full evaluation has been undertaken to assess any detrimental impact they may have on vulnerable people living within Northern Ireland.**

However, in light of the fact that the Committee and stakeholders are being asked to respond to the DWP consultation at this stage we have sought to identify some specific issues that should be taken into consideration:

- Clarity is needed on DWP's approach to different types of supported and sheltered housing. The two broad groups outlined in the consultation - people in conventional supported housing and people with more specific housing needs – cover a huge variety of different types of different schemes for difference needs with different costs. These variations need to be fully understood and taken into account before reform is implemented. (Paragraphs 43 & 49)
- The consultation paper implies that conventional supported housing – including hostels, foyers and refuges – houses people with low or negligible support needs. In our experience most people using these services require intensive levels of support, albeit often for shorter periods.
- Making fundamental changes to benefits based on a personalisation agenda is problematic. Whilst we are not against personal budgets and payments for additional support being made to individuals, it must be recognised that a one size fits all approach will not work. Some individuals will be unwilling and unable to take control of a personal budget and in the instance of someone with an active substance misuse need, for example, this could do more harm than good. For some vulnerable service users direct payments to landlords are essential. The system should be developed in such a way that personal budgets are phased in on the basis of mutual agreement, need and risk assessment. (Paragraph 20)
- It is important there is no Shared Accommodation Rate for supported housing. We strongly believe that single rates will not work and will result in closures across the social housing sector, with the consequence of increased and repeat homelessness and increased need for costly statutory intervention. The impact on housing provision in terms of rent collection will manifest as rising rent arrears, increased debt, increased eviction, and the

likelihood of increase and repeat homelessness, particularly amongst the most vulnerable. It will also have a negative impact on the capacity of providers to manage their services.

- The DWP consultation proposes including private sector housing under the exempt accommodation status in order to target help by 'accommodation type rather than type of landlord'. We welcome this in principle, but consideration needs to be given to the intended and unintended impact reform will have on the market for supported and specialist housing. The process by which rents are arrived at should be transparent, but transparency and simplicity should not come at the cost of providers being forced into running larger schemes to achieve economies of scale in order to accommodate an artificial flat-rate of Housing Benefit. Private sector landlords providing accommodation with support provided by existing voluntary sector services is a model that is already working well and will be increasingly important as the private rented sector is used to provide housing for those in need. However, the private sector also providing support services is a proposal that we would have some concerns around, principally on the basis that these providers would not be subject to the same regulation as those operating in the voluntary sector and the quality of support services could be at risk.

#### **Summary:**

**The VSHPF welcomes the debate around housing benefit reform with regard to supported housing and the recognition within the consultation paper that supported housing necessarily costs more than other forms of housing. The commitment to continuing to provide support for vulnerable, older and disabled people in order for them to live in the community is also to be welcomed, as is more targeted support for those who need it most. However, as outlined above the consultation raises, or more accurately fails to raise, particular issues for Northern Ireland and the fact that the funding and provisions of supported housing does not mirror that in other parts of the UK. It also contains a number of proposals that require further clarification and consideration on a UK wide basis.**

In conclusion we would like to emphasise what we stated previously that the consultation does not apply to Northern Ireland and as such the proposals within the consultation paper do not reflect the working systems and the Housing Benefit context currently existing within Northern Ireland.

The way in which Housing Benefit assists those living in supported housing within the social and voluntary sector with their rent is different in Northern Ireland from the rest of GB. This is a fundamental principle to bear in mind when considering how suitable these proposals are in relation to the Northern Ireland housing system.

We further ask for recognition that the operation of the Housing Benefit System for supported housing in Northern Ireland is considerably different to that within the rest of the United Kingdom and because of this we recommend that the implementation of the draft proposals should be postponed until a full evaluation has been undertaken to assess any detrimental impact they may have on vulnerable people living within Northern Ireland.

We hope you find these comments useful please do not hesitate to contact either of the undersigned if you require any further information or clarification.

Ricky Rowledge Secretary (VSHPF)



Carol O'Bryan Chairperson (VSHPF)

