Homelessness in Northern Ireland

Northern Ireland
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Dorinnia Carville   *Northern Ireland Audit Office*
Comptroller and Auditor General   *25 March 2025*

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List of Abbreviations

B&B	Bed and Breakfast
CCEA	Council for the Curriculum, Examinations and Assessment
CHF	Central Homelessness Forum
DfC	Department for Communities
DE	Department of Education
DIME	Dispersed Intensively Managed Emergency
DoH	Department of Health
DoJ	Department of Justice
DOT	Drug Outreach Team
FDA	Full Duty Applicant
HSS	Housing Selection Scheme
HSSG	Homelessness Strategy Steering Group
IDHAP	Interdepartmental Homelessness Action Plan
KPI	Key Performance Indicator
LHA	Local Housing Allowance
MDT	Multi-disciplinary Team
NIFHA	Northern Ireland Federation of Housing Associations
NIHE	Northern Ireland Housing Executive
PfG	Programme for Government
PHA	Public Health Agency
PSNI	Police Service of Northern Ireland
RHA	Registered Housing Association
SAPTA	Strategic Action Plan for Temporary Accommodation
SHDP	Social Housing Development Programme
SHMA	Strategic Housing Market Analysis
SPT	Substitute Prescribing Team

Key Facts

17,000

homeless
presentations in
2023-24

29,000

homeless households on
social housing waiting list

12,000

homeless households
on the waiting list for
more than four years

£31 million

increase in temporary
accommodation
expenditure between
2018-19 and 2023-24

4,700

households
in temporary
accommodation on a
single night

£12 million

spent on hotel and
B&B accommodation
in 2023-24 (£0.9
million in 2018-19)

£4.5 million

spent on
homelessness
prevention in 2023-24

Executive Summary

Executive Summary

Background

1.   Homelessness is widely recognised as being a complex and multi-faceted issue, which goes beyond the absence of a physical home. Its impacts extend across the draft Programme for Government (PfG), with direct implications for health, justice, education, welfare and employment. Various issues, particularly mental health and addiction, can equally have an impact on homelessness.

2.   Housing and homeless policy is a devolved matter in Northern Ireland. The Department for Communities ('the Department') develops homelessness and housing policy for Northern Ireland. The Northern Ireland Housing Executive ('the NIHE') is the body tasked with responding to homelessness. The Department provides the NIHE with funding for homelessness services and social housing new builds which are mainly completed by housing associations.

3.   The NIHE publishes a homelessness strategy every five years and the current strategy 'Ending Homelessness Together' ('the Strategy') covers the period 2022-27. The three core strategic objectives are to:

- prioritise homelessness prevention;

- address homelessness by providing settled, appropriate accommodation and support; and

- support customers to transition from homelessness into settled accommodation.

4.   When an individual or household presents as homeless, the NIHE assesses their eligibility and status using a series of tests. Applicants deemed Full Duty Applicants (FDAs) are owed a housing duty and considered statutorily homeless. Northern Ireland is the only UK jurisdiction where both presentations and acceptances have fallen since we last reported on this topic in 2017. Official figures show that homelessness presentations have fallen from 18,500 households in 2016-17 to almost 17,000 households in 2023-24. The proportion of presenting households to whom a full duty was owed remained consistent during the same period.

5.   We last reported on homelessness in 2017, concluding that the aim of reducing homelessness over the course of the Homelessness Strategy 2012-17 had limited success. The NIHE has told us that since then, the homelessness sector has faced unprecedented challenges including:

- The impact of the COVID-19 pandemic, leading to a significant increase in demand for temporary accommodation.

- The cost-of-living crisis which increased rental and household costs, making established housing arrangements unaffordable and reducing capacity of private rental accommodation as some landlords exited the sector.

- The increasing cost to the NIHE of delivering on its statutory responsibilities for homelessness coupled with other budgetary pressures has meant that a smaller proportion of homelessness funding has been allocated to prevention work.

- The relatively small but growing numbers of households with leave to remain in Northern Ireland presenting to the NIHE requiring homelessness services.

Key findings

Dealing with homelessness, particularly temporary accommodation, is creating unsustainable financial pressure for the NIHE

6.   NIHE homelessness expenditure includes Supporting People housing support services, provision of temporary accommodation and prevention measures. Annual NIHE gross expenditure on homelessness has increased by £26 million in three years and reached £75.3 million in 2023-24, consisting of £38.6 million in temporary accommodation costs, £31.2 million in Supporting People housing support services and £5.5 million in prevention and other costs. The majority of the increase in expenditure is due to increased spending on temporary accommodation.

7.   The NIHE has a duty to provide temporary accommodation to both those who are statutorily homeless and on the social housing waiting list and those who are undergoing assessment and are believed to be homeless and in priority need. It uses a range of accommodation types, including private single lets, hostels, and commercial hotels and B&Bs to fulfil this duty, with private single lets used for the majority of placements in temporary accommodation.

8.   Demand for temporary accommodation soared during the COVID-19 pandemic, as people were no longer able to share with family and friends, and this has never receded. NIHE data shows that on a typical night, over 4,700 households are in temporary accommodation, an increase of around 3,000 households since 2017.

9.   Total NIHE gross expenditure on temporary accommodation, before recovery of any income related to placements, has increased significantly, from £7.6 million in 2018-19, to £38.6 million in 2023-24 and temporary accommodation costs now represent half of all NIHE spending on homelessness. This figure includes £2.8 million of spend on taxis and furniture storage.

Expenditure on hotels and B&Bs is disproportionate to the number of households placed in this type of accommodation

10. Whilst most temporary accommodation is in the form of single lets, on any given night, around 10 per cent of households in temporary accommodation are in hotels and B&Bs. However 32 per cent of annual spend on temporary accommodation is on this type of property. Of the £38.6 million spent on temporary accommodation (before receipt of rental and housing benefit income of £8.3 million) in 2023-24, £12.2 million was on hotels and B&Bs. This compares to just over £7.6 million in 2022-23 and £0.9 million in 2018-19.

11. We found that processes and controls on spending on hotels and B&Bs have been improved and should now be formalised. The NIHE uses a combination of block booking, other properties which have agreed rates and pay-as-you-go arrangements. Formal procurement processes are not required for spending of this nature, however the NIHE has developed a set of principles to guide decision-making which has led to reductions in the nightly rates it pays. Given the considerable and ongoing need for hotel and B&B accommodation and the significant efforts the NIHE has made to improve controls over this expenditure, it is important that these processes are now formalised and documented to ensure that they are implemented consistently and that value for money is central to decision-making.

In the absence of ring-fenced funding, prioritisation of homelessness prevention, a key strategic objective, has not been achieved

12. The first strategic objective of the 2022-27 Homelessness Strategy is to '*prioritise homelessness prevention through the provision of the right support at the right time with an aim to prevent homelessness from happening in the first place*'. Research suggests that prevention could have a considerable impact on both the financial and personal costs of homelessness with potential long-term savings for the public purse.

13. Despite the strategic importance of homelessness prevention, annual bids by the NIHE to the Department for additional prevention funding have often not been successful. Ensuing budget constraints as a consequence, coupled with the need to prioritise spending on other frontline statutory services has meant that typically the NIHE has spent less than 10 per cent of its homelessness expenditure on prevention and early intervention. Whilst actual expenditure on community and strategic prevention increased from £3.4 million in 2019-20 to £4.5 million in 2023-24, the proportion of overall spend has reduced slightly, falling to just six per cent in 2023-24. The NIHE told us that while it carries out a range of actions aimed at preventing homelessness, without a ring-fenced budget, funding must be prioritised on its statutory responsibilities.

14. The NIHE's key objective of prioritising homelessness prevention has been limited in its success due to these funding challenges, despite being at the heart of the Strategy and its potential for long-term harm reduction and cost savings across public services.

A lack of social housing supply is a key issue, hampering attempts to tackle homelessness

15. There are now over 29,000 households on the social housing waiting list who have homeless status. Allocations of social housing are not keeping pace with the level of demand and, as a consequence, many households spend years waiting for a suitable, permanent home. More than half of all households with FDA status have been on the waiting list for more than two years and over 12,000 FDA households have been on the waiting list for more than four years.

16. Each year the NIHE publishes a Commissioning Prospectus which outlines social and intermediate housing requirements over the subsequent five-year period. The five-year projected need for social housing per the Commissioning Prospectus over the period 2023-28 is almost 25,000 new units. While there are capacity issues impacting the supply of new social housing, the availability of funding is also a constraining factor. Annual targets of 2,000 new social housing units for 2023-24 and 2024-25 were subsequently reduced to 1,500 for each year to reflect funding available from the Department, further widening the shortfall between target and unmet social housing need as determined by the Commissioning Prospectus.

17. Monitoring and reporting arrangements for unoccupied social housing, known as voids, are not consistent between the NIHE and Registered Housing Associations (RHAs). Related to this, a few RHAs report long re-let times amongst their stock. Consistent and more regular monitoring of all void properties would identify medium to long-term voids within RHA stock which could be used as a cost effective option to help meet demand for temporary accommodation.

Progress towards achieving strategic homelessness objectives has been limited, with insufficient outcomes monitoring

18. The NIHE's reporting to date has shown little in the way of sustained improvement against its strategic homelessness outcomes and indicators. Indicators used to measure progress against the three core objectives set out in its homelessness strategy have either regressed or have not had baselines established, almost halfway through the strategy period.

19. There are many oversight and governance groups involved in delivering and monitoring homelessness services. We found duplication in the membership and issues covered by these groups, which appears to be an inefficient use of resources. Survey responses from members of the Homelessness Strategy Steering Group, which is chaired by the Department, highlighted frustrations with the oversight provided by this group and the need for clarity over roles and responsibilities of various governance groups.

20. We noted that the focus of the oversight groups involved appears to be relatively low level and on outputs, rather than outcomes. Our review of annual strategic action plans highlighted a number of issues including a lack of clear alignment between actions and objectives, significant carry-over of actions between years with little progress and a number of actions that are unlikely to be achievable as they are entirely reliant on additional funding. We also considered that annual reporting on Key Performance Indicators (KPIs) is inaccurate in places.

Examples of effective cross-departmental working are scarce

21. The Interdepartmental Homelessness Action Plan (IDHAP), which is developed by the Department, was first published in 2017 to complement the Homelessness Strategy, addressing gaps in non-accommodation services such as health care and employability. However, we found the IDHAP contains few genuine examples of collaborative working between departments. While single departmental actions can be effective in addressing homelessness, we would have expected to see more examples of collaborative working. Like the issues found with strategic monitoring, our review of IDHAP action plans found a lack a focus on how actions have contributed to measurable outcomes for service users. Further, despite prevention being at the centre of the Homelessness Strategy, the IDHAP makes limited reference to homelessness prevention and early intervention.

22. Whilst examples of cross-departmental working within the IDHAP were limited, we did find examples of effective collaboration between statutory services and the community and voluntary sector, such as the Complex Lives project in Belfast and the Beyond the Gate service for prisoners leaving custody. The NIHE and the Department should work with other departments and the community and voluntary sector to identify best practice and implement lessons learned from these projects to improve statutory collaboration on homelessness services.

Conclusions and recommendations

23.   Homelessness remains a significant social and economic problem in Northern Ireland. The demand for homelessness services, in particular temporary accommodation, coupled with an insufficient supply of social housing is creating significant financial and operational pressures for the NIHE. In this context our report finds that the NIHE has not been able to make sustained progress towards its main strategic homelessness objectives, particularly the prioritisation of prevention.

24.   Until these key issues are resolved, the NIHE is unable to demonstrate value for money in its use of hotels and B&Bs for temporary accommodation, and demand for homelessness services is likely to continue to escalate to a point where it could become unsustainable.

Recommendation 1

The NIHE should develop a system that captures data on all prevention outcomes, and integrate this into performance monitoring to help target resources appropriately and to demonstrate the impact of prevention work.

Recommendation 2

The NIHE should continue to seek ways to minimise its reliance on hotel and B&B accommodation and reduce its spending on this type of accommodation. It should ensure that a timebound action plan to implement the value for money framework is established and that the Board monitors its progress.

Recommendation 3

The NIHE should formalise and document its processes and controls over both block booked and routinely used non-standard accommodation, incorporating findings from the value for money framework.

Recommendation 4

The NIHE should complete and publish a review of the Strategic Action Plan for Temporary Accommodation, including an assessment of the extent to which actions have been completed and indicative timeframes for remaining actions. This review should also identify areas to prioritise and those where further action or funding is required.

Recommendation 5

The Department and the NIHE should work together to develop reporting on Social Housing Development Programme targets to record the shortfall between unmet social housing need per the NIHE's Commissioning Prospectus and the number of new starts which can be delivered as determined by the Department. The shortfall should be further analysed between funding and capacity constraints which are present.

Recommendation 6

The Department should identify options to establish a more robust, consistent and regular monitoring system for all void Registered Housing Association properties.

Recommendation 7

The NIHE should expand its collaboration with Registered Housing Associations and aim to agree an action plan to maximise the use of medium to long term void Registered Housing Association properties for temporary accommodation, similar to how it currently uses its own long-term voids for temporary accommodation.

Recommendation 8

The NIHE and the Department should review and clarify the roles and responsibilities of key homelessness governance and oversight groups. In the first instance, this review should focus on the Homelessness Strategy Steering Group and the Central Homelessness Forum. The review should identify opportunities to streamline the governance arrangements and reduce duplication between groups.

Recommendation 9

People experiencing homelessness interact with a range of different services. We recommend that the Department and the NIHE should work with other departments represented on the Homelessness Strategy Steering Group to identify opportunities for meaningful and significant joint working on homelessness services and to target resources collaboratively. This should include engaging with the community and voluntary sector to review projects which are working effectively, identify best practice and lessons learned.

Recommendation 10

The NIHE and the Department should review all strategies and action plans which have a direct link to the Homelessness Strategy and ensure that actions are properly evaluated, including the degree to which they contribute to outcomes. Annual reporting should include assessment of measurable long-term progress and identification of corrective actions and improvements required in subsequent years.

Part One:

Introduction and background

Part One: Introduction and background

## Homelessness remains a significant social and economic problem in Northern Ireland

1.1 It is commonly misinterpreted that homelessness refers to 'rough sleepers', however it more accurately refers to those individuals who are in accommodation which is unsuitable, or who depend on informal arrangements for housing. The statutory definition of homelessness is found in Article 3 of the Housing (Northern Ireland) Order 1988 ('the Order'):

'a person is homeless if he has no accommodation available for his occupation in the United Kingdom or elsewhere'

1.2 Housing and homeless policy is a devolved matter. In Northern Ireland, the Order identifies the Northern Ireland Housing Executive ('the NIHE') as the body tasked with responding to homelessness. The NIHE publishes a homelessness strategy every five years and the current strategy 'Ending Homelessness Together' (the Strategy) covers the period 2022-27.

1.3 The Order places a statutory duty (Articles 8 and 10) on the NIHE to provide interim and/or permanent accommodation for certain homeless households, dependent upon an assessment of their circumstances. The Department for Communities ('the Department') is the NIHE's sponsor and works with it in the development of homelessness and housing policy for Northern Ireland. The Department provides the NIHE with funding for homelessness services and social housing new builds which are delivered by Registered Housing Associations (RHAs). Northern Ireland is unique in this context, as in the other UK jurisdictions local authorities (councils) rather than government departments have the statutory responsibility to discharge this duty.

1.4 Homelessness is widely recognised as being a complex and multi-faceted issue, which goes beyond the absence of a physical home. Its impacts extend across the Programme for Government (PfG), with direct implications for health, justice, education, welfare and employment.

1.5 Official figures show that the number of people presenting as homeless have fallen since we last reported on this topic. Almost 17,000 households presented as homeless in 2023-24. As a household can refer to a number of individuals, the actual number of people who are homeless is likely to be much higher. By 2023-24 the number of homeless households on the waiting list for social housing reached 29,000.

The NIHE applies a series of tests before an applicant is deemed homeless

1.6 When an individual or household presents as homeless, the NIHE must assess their eligibility and status using a series of tests. Applicants must meet all of the following four criteria to be deemed statutorily homeless/Full Duty Applicants (FDAs) and owed a housing duty:

- *Eligibility* – the applicant must be eligible for homeless assistance in Northern Ireland. This considers immigration status and whether they or any members of their household have been involved in anti-social behaviour.

- *Homelessness* – this element considers the circumstances of the case in assessing whether the applicant has nowhere suitable to live, about to become homeless or at risk of becoming homeless.

- *Priority need* – there are certain circumstances which indicate if an applicant is in priority need, for example having dependent children, vulnerable individuals or at risk of violence at home.

- *Intention* – this considers whether an applicant is intentionally homeless because of something that they did or failed to do. Applicants will not be accepted where they are found to be intentionally homeless.

Figure 1: The homelessness acceptance process
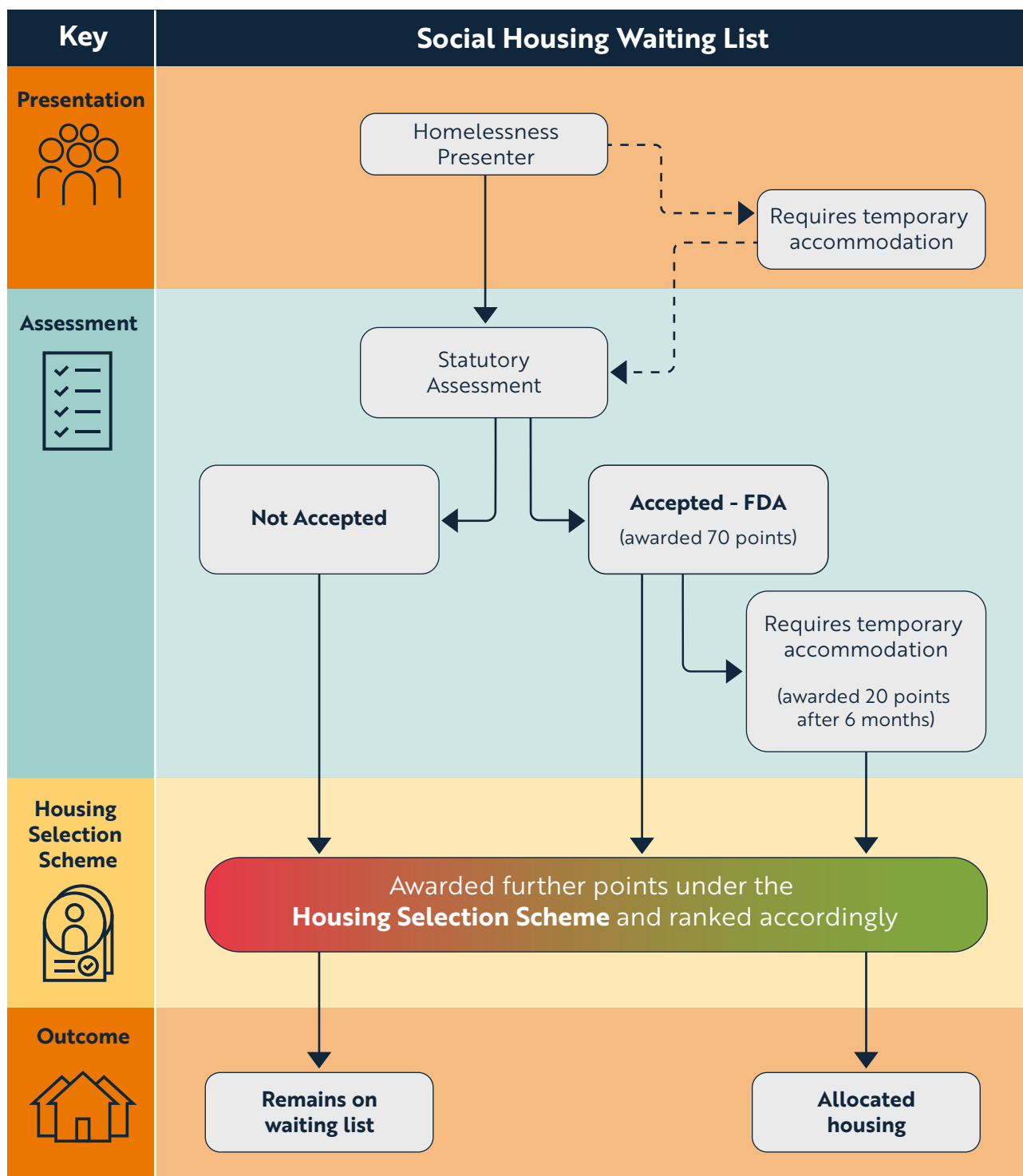
Source: NIAO interpretation of NIHE processes

1.7   The NIHE has a duty to provide temporary accommodation if required to FDAs who are awaiting an offer of social housing. It also owes a duty to provide temporary accommodation to those who are believed to be homeless and in priority need while it undertakes the statutory assessment. An individual can therefore be placed in temporary accommodation during the assessment process, even if they ultimately do not meet all of the FDA criteria.

Homelessness services are facing unprecedented challenges

1.8   The homelessness sector has undergone a number of changes since we last reported on this topic in 2017. The COVID-19 pandemic brought new challenges to the homelessness sector, including the loss of informal accommodation arrangements leading more people to seek temporary accommodation at the same time as capacity was reduced to limit social contact.

1.9   The recent cost-of-living crisis has also had implications for the homelessness sector. The ONS reported that average rent inflation in Northern Ireland was almost 10 per cent in the year to June 2024.   This has contributed to housing becoming unaffordable for many people and more households presenting as homeless as a result.

1.10   The NIHE told us that budgetary pressures have resulted in less money being available for prevention work. Budgets have also been affected by the increased demand for, and cost of, temporary accommodation. Stakeholders from the community and voluntary sector whom we engaged with said that they have also felt the impact of budgetary constraints, with less grant funding available and short-term budgets restricting their capacity to deliver services for the sector.

1.11   Statistics have also shown an increase in the number of people re-presenting as homeless, having presented less than 12 months previously or having been excluded from three or more temporary accommodation placements in the previous 12 months. The NIHE published a Chronic Homelessness Action Plan in 2020 which aimed to improve the data collection in relation to chronic homelessness and to provide inter-agency support for individuals who fall into this category.

1.12   During our engagement we heard that the homelessness sector has also experienced significant staffing issues since we last reported on this subject. Research commissioned by Homeless Connect in 2022 concluded that there were a number of challenges experienced by those working in the homelessness sector and posing a risk to its sustainability:

· A lack of funding and investment and the need for improved support.

· External factors meaning the nature of the work is becoming more challenging.

· Impacts on staff wellbeing making recruitment and retention difficult.

The report concluded that these issues were exacerbated by the COVID-19 pandemic which '*stretched an already stretched workforce*'. The research also pointed to budgetary pressures and lack of multi-year budgets as impeding the work which can be done to improve the situation for staff working in the sector.

1.13   A further factor in the last couple of years has been in relation to asylum seekers who have been given leave to remain in the UK. The Home Office has sped up its asylum decision-making processes in the last 18 months and the number of households given leave to remain status who require homelessness services is increasing. The NIHE told us that short notice periods for leave to remain decisions makes it difficult to plan for on a household-by-household basis, and that the acceleration in decision-making has led to increased demand for homelessness services and temporary accommodation. At January 2025, around five per cent of homelessness acceptances and ten per cent of households in temporary accommodation were those with leave to remain status.

1.14   Finally, the increasing complexity of the casework is another factor contributing to the challenges faced by homelessness services. Homelessness service providers told us that the rise in complexity has a number of causes including an increased incidence of individuals experiencing severe mental health issues.   The NIHE told us that these more complex cases require increased time and resources to assist.

Homelessness has wide impacts across society

1.15   Homelessness is a complex matter, and recent research demonstrates the significant interrelated impacts across society, health, education and the economy.

- A systematic literature review found those with lived experience of homelessness had 2.49 times the rate of emergency hospital re-admission, 0.60 times the rate of planned hospital re-admission and 2.57 times the rate of Accident and Emergency visits compared with housed patients living in deprived areas.

- It also referenced that overall, individuals who experience homelessness during childhood, when foundational cognitive and non-cognitive skills are being formed, are more likely to have more severe and long-term consequences compared to those who experience homelessness later in life.

- A study published by Simon Community and DePaul in January 2023 highlighted the link between homelessness and mental health in Northern Ireland. This found that 68 per cent of people experiencing homelessness have a diagnosed mental health condition, compared to 19 per cent in the overall population, with 84 per cent receiving this diagnosis prior to becoming homeless.

- Research commissioned by Shelter found a perception from teachers surveyed that school attendance, arriving late, arriving hungry and arriving tired were issues for children who are homeless or in poor housing. In particular, attention was drawn to the accepted view that absenteeism has strong links to educational attainment and performance, with poorer academic achievement for homeless children even when compared with their peers from low-income households.

Scope and structure

1.16   This report considers how the landscape around homelessness services has changed since the last NIAO report was published in 2017. It provides an opportunity to evaluate the efficiency and effectiveness of the approach taken by the NIHE to prevent and reduce homelessness and to provide appropriate help and advice.

- Part Two outlines the trends in homelessness presentations and acceptances since our last report, and examines the factors limiting prevention work.

- Part Three considers the significant increase in demand for temporary accommodation, including the issues that have driven demand and the impact on NIHE expenditure.

- Part Four looks at the supply of social housing and the effect this has on the social housing waiting list.

- Part Five outlines the strategic, governance and accountability structures for homelessness services, considering their effectiveness and plans for the future.

1.17   Our methodology included review and analysis of publicly available information on homelessness and housing, including the NIHE's and Department's statistics, as well as reports published by other bodies. We also examined financial information provided by the NIHE on homelessness services, completed stakeholder surveys and engaged with community and voluntary groups providing services to homeless people.

Part Two:
Homeless presentations and prevention

Part Two: Homeless presentations and prevention

Since our last report in 2017, homeless presentations have fallen

2.1 Overall, presentations fell from 18,500 households in 2016-17, to around 16,000 households in 2020-21 before increasing to nearly 17,000 households in 2023-24. As a household can be more than one individual, the number of individuals involved is likely to be much higher. The proportion of households to whom a full duty was owed remained fairly consistent during the same period. These figures compare favourably with other jurisdictions, where in the same period presentations have risen considerably.

2.2 The NIHE told us that factors contributing to the relatively flat presentations in Northern Ireland include its work on tenancy sustainment and the introduction of financial inclusion managers, which are considered in more detail later in this chapter. In addition, the Department told us that maintaining a Supporting People Programme and the range of welfare mitigations that are unique to Northern Ireland have also contributed to lower homelessness presentation levels than elsewhere.

Figure 2: Homelessness presentation and acceptances are relatively stable

	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
Presentations	18,573	18,180	18,202	16,802	15,991	15,758	15,965	16,943
Accepted as FDA	11,889	11,877	12,512	11,323	9,889	10,135	10,349	11,537
	64%	**65%**	**69%**	**67%**	**62%**	**64%**	**65%**	**68%**

Source: DfC, Northern Ireland Housing Bulletin, April – June 2024

2.3 The majority of households accepted as homeless are families (around 35 per cent in 2023-24) followed by single males (27 per cent in the same period). This trend is largely unchanged since 2016-17. In 2023-24, the most prevalent reason for presentation was 'accommodation not reasonable' (31 per cent) followed by 'sharing breakdown/family dispute' (18 per cent). These reasons are largely unchanged since 2016-17.

NIHE spending on homelessness services has increased, reaching £75.3 million in 2023-24

2.4 NIHE homelessness expenditure includes:

- temporary accommodation costs;
- community prevention and support measures;
- strategic prevention initiatives; and
- Supporting People housing support services. Supporting People is a grant funding programme that provides housing support services including hostels.

2.5 There has been significant and rising demand for all homelessness services in recent years, with overall NIHE gross expenditure of £75.3 million in 2023-24. Since 2020-21, annual NIHE gross spend on homelessness has increased by £26 million. The increase in homelessness expenditure is almost entirely driven by increased demand for temporary accommodation, particularly increases in the costs of providing temporary accommodation itself. In 2023-24, total gross expenditure on temporary accommodation was £38.6 million, representing over 50 per cent of overall homelessness expenditure and an increase of almost £23 million since 2020-21. The impact of the demand for temporary accommodation is explored in more detail in Part Three.

Figure 3: Homelessness expenditure has increased by £26 million in three years

Source: NIAO analysis of NIHE financial information

Note: Other costs, not included in this analysis, include staffing costs for the Out of Hours service and tenancy sustainment by social housing landlords.

The social housing waiting list continues to grow and is now at its highest ever level

2.6 On 31 March 2024 there were 29,000 households on the social housing waiting list with FDA status, an increase of over 3,000 on the previous year and over 13,000, or 80 per cent, since 2016-17. In Northern Ireland, social houses are allocated according to the Housing Selection Scheme (HSS), which is a points-based system. A household is considered in housing stress if it has more than 30 points. FDAs receive 70 points, while points are also awarded for criteria such as support, and care and social needs. The proportion of households on the waiting list who are FDAs, and are therefore statutorily homeless, has risen steadily since 2021.

Figure 4: The social housing waiting list has grown significantly

	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
Social housing waiting list	37,611	36,198	37,859	38,745	43,971	44,426	45,105	47,312
FDA status	16,356	17,250	19,629	20,951	22,217	23,978	26,310	29,394
	43%	**48%**	**52%**	**54%**	**51%**	**54%**	**58%**	**62%**

Source: Waiting list from Department for Communities, Northern Ireland Housing Statistics 2023-24 FDA status from NIHE internal data

2.7   Allocations of social housing as a proportion of the waiting list have fallen from around 20 per cent per annum in 2016-17 to 12 per cent in 2023-24. It is reasonable to conclude that this is largely due to a lack of supply of social housing, discussed further in Part Four of this report.

Figure 5: Allocations are not keeping pace with demand from the social housing waiting list
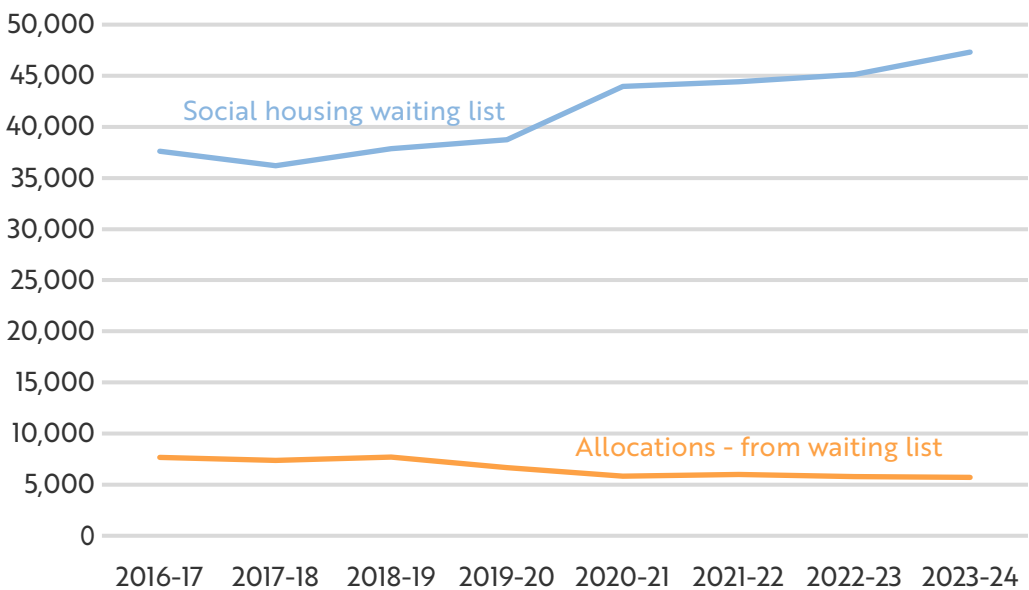
Source: DfC, NI Housing Statistics 2023-24, September 2024
Note: not all allocations have an impact on the waiting list as around a third are transfers by existing tenants.

2.8   The growth of the waiting list, alongside the slowing of allocations and lack of social housing supply, means that many households spend years waiting for a suitable, permanent home. As at the end of June 2024, the majority of FDA households had been on the social housing waiting list for more than two years and over 12,000 FDA households had been on the waiting list for more than four years.

Figure 6: Over 12,000 FDA households have been on the social housing waiting list for more than four years
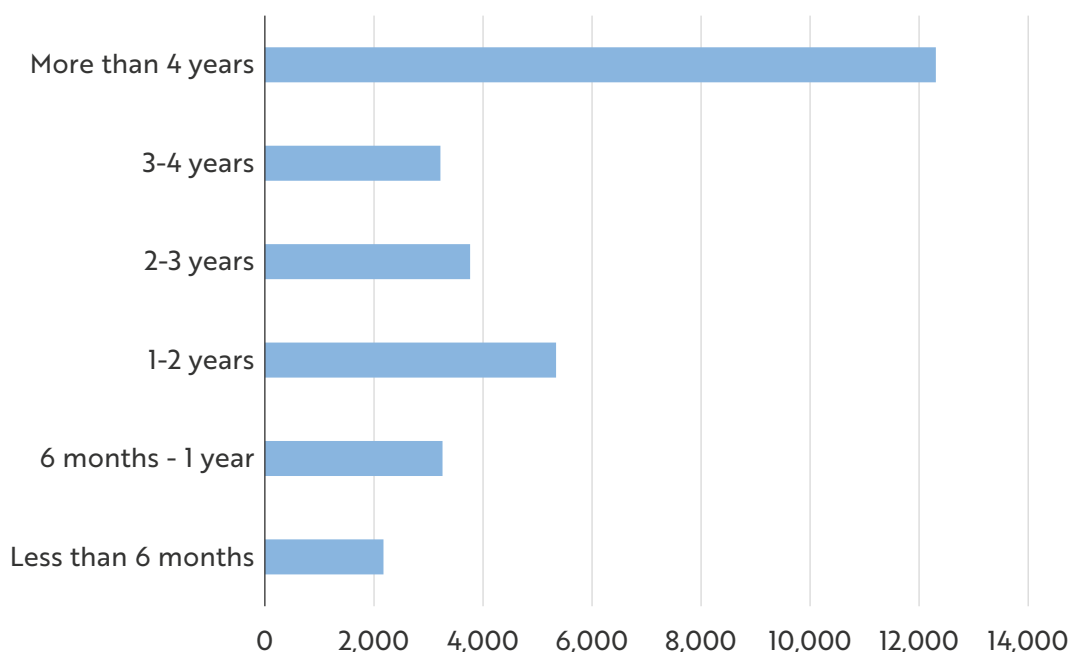
Source: Internal NIHE data

Prioritisation of homelessness prevention is a key aim of the Strategy

2.9   The first strategic objective of the 2022-27 Homelessness Strategy is to '*prioritise homelessness prevention through the provision of the right support at the right time with an aim to prevent homelessness from happening in the first place*'. 'Homelessness prevention' means providing people with help and support to address their housing and other needs, to avoid homelessness. Homelessness prevention can best be achieved by intervention at the earliest possible stage. The NIHE and the Department fund and support a range of organisations that provide advice and assistance to households approaching crisis before homelessness occurs. In undertaking this study, we found an acceptance within the sector that prevention of homelessness offers a better outcome for the individual as well as representing better value for money.

Preventing homelessness could create considerable cost savings

2.10   There is a range of research which shows the considerable impacts of homelessness prevention on reducing both the personal and financial costs of homelessness. For example, a study by the homeless charity Crisis estimated that, on average, preventing homelessness for one year would result in a reduction in public expenditure of £9,266 per person. Falls in spending were estimated as likely to occur because data indicate rates of use of NHS services, drug and alcohol services and mental health services are higher among homeless people than the housed population. Rates of contact with the criminal justice system may also be lower for housed people than homeless people.

The statutory duty to prevent homelessness in Northern Ireland is not as wide-reaching as other jurisdictions

2.11 The Housing Order (Northern Ireland) 1988 places duties on the NIHE to ensure advice about the prevention of homelessness is available free of charge to any person in Northern Ireland; to have a strategy for preventing homelessness; and to take reasonable steps to ensure that accommodation does not cease to become available for households at risk of homelessness within 28 days who have a priority need.

2.12 The equivalent duties for local authorities in other UK jurisdictions (Homelessness Reduction Act, Housing (Wales) Act and Housing (Scotland) Act) are more extensive as the time periods for which the threat of homelessness exists are longer (56 days and two months), and they do not require the household threatened with homelessness to have a priority need.

2.13 Published data for England reflects that in 2023 this prevention duty was discharged for over 133,000 households, with 51 per cent (68,120) of those households retaining their current accommodation. Statistics for Wales reflect a similar trend, with 58 per cent of cases successfully prevented for at least six months.

2.14 While every action plan to date has included an action for the NIHE to liaise with the Department to identify and advocate for potential legislative arrangements, 'including considering the benefits of additional duties such as co-operation and prevention', no significant progress has been made in this area. The NIHE told us that it would welcome additional statutory responsibility for prevention.

Despite being a key strategic priority, sufficient funding for prevention work has not been available

2.15 Despite the strategic aim of prioritising homelessness prevention, since 2020 less than 10 per cent of NIHE annual homelessness expenditure has been on prevention initiatives and projects. Whilst actual expenditure on community and strategic prevention increased from £3.4 million in 2019-20 to £4.5 million in 2023-24, the proportion of overall spend has reduced slightly. In 2023-24 just six per cent of NIHE homelessness spend was on prevention.

2.16 The NIHE reported that prevention was further prioritised through the establishment of the Homeless Prevention Fund, which was intended to operate for the duration of the 2022-2027 Homelessness Strategy. In 2022-23, the Homeless Prevention Fund provided £975,000 to enable the delivery of 34 projects by community and voluntary sector organisations which resulted in almost 7,000 service users receiving support from interventions. However, in 2023-24, while 66 applications totalling over £2 million were received, no funding was provided by the Homeless Prevention Fund due to budgetary constraints. Under these circumstances, we do not consider this represents proper prioritisation of a key strategic objective of the NIHE.

2.17 Notwithstanding the legislative prevention duty, funding and services have not been ring-fenced. Whilst the NIHE has bid for additional funding, often it has not been successful and spending has had to be allocated to maintain other frontline, statutory services such as temporary accommodation. The full impact of NIHE prevention work has therefore not been realised and it is likely that households are becoming homeless in circumstances that could otherwise be preventable with earlier intervention. The NIHE's key objective of prioritising homelessness prevention has not been achieved, despite its potential for long-term harm reduction and cost savings across public services. We note that in December 2024, the Communities Minister announced his intention to create a separate, ring-fenced prevention fund for the first time, starting in the 2025-26 financial year.

2.18 The NIHE and the Department have outlined a number of actions they have taken aimed at preventing homelessness, including:

- Introduction of Financial Inclusion Managers, whose role is to assist customers experiencing financial difficulties or requiring advice in relation to benefits. The NIHE told us that referrals to Financial Inclusion Managers rose by almost 300 per cent in 2023-24.

- Pre-discharge work in prisons, including the introduction of Universal Credit and Housing Officers attending prisons to offer advice and support to those about to be released.

- Discretionary Housing Payments which are now focused on sustaining tenancies in the private rented sector and therefore preventing homelessness.

The NIHE has only recently started to record prevention outcomes

2.19 We found a lack of singular recording of outcomes as a result of funded prevention activity. Returns provided by projects funded by the Homeless Prevention Fund include a considerable range of qualitative and quantitative information, however the ultimate impact of the Homeless Prevention Fund is restricted by the non-recurrent nature of the funding and the short delivery timescales as a result. The NIHE and partner organisations have agreed a definition of a prevented case, however a baseline for this data was not established until 2023-24, which has further delayed attempts at outcomes monitoring in this area.

2.20 In our 2017 report on Homelessness, we found that the NIHE could not demonstrate the effectiveness of its approach to homelessness prevention, and made a recommendation to improve data in this area. A review of the annual action plans and progress reports (see Part Five) shows that there has been limited progress in this area, and that prevention outcomes started to be recorded in 2023-24. There has therefore been no monitoring of prevention outcomes and we do not consider our 2017 recommendation to be properly implemented. In the absence of robust monitoring of prevention activities, the NIHE and partner agencies are still unable to demonstrate the impact of these services and the potential long-term value for money that they provide. Again, this is evidence of the limited impact of prevention despite it being at the heart of the Strategy and we must reiterate our 2017 recommendation.

Recommendation 1

The NIHE should develop a system that captures data on all prevention outcomes, and integrate this into performance monitoring to help target resources appropriately and to demonstrate the impact of prevention work.

Part Three:
Temporary accommodation

Part Three: Temporary accommodation

The NIHE provides temporary accommodation to households who are statutorily homeless, until a more permanent housing solution is found

3.1 The NIHE has a homelessness duty to provide temporary accommodation to both those who are statutorily homeless and in priority need, and those who are undergoing assessment and are believed to be homeless and in priority need. The types of temporary accommodation used by the NIHE include:

- Private single lets – private dwellings made available on a temporary basis, with these being secured by the NIHE from providers in the private rented sector.

- Voluntary sector hostels – hostel accommodation providing accommodation-based support for vulnerable households, funded through Supporting People. 'Crash beds' are also available for overnight accommodation on an emergency basis.

- NIHE hostels – self-contained units suitable for households with low support needs.

- External accommodation – private sector 'non-standard accommodation' units, usually within hotels and B&Bs.

- Dispersed Intensively Managed Emergency Accommodation (DIME) – accommodation for individuals who have high levels of support needs and high-risk behaviours. This is a scheme in which units are leased by the NIHE and where the private sector provider is employed under contract to act as a managing agent and support provider.

3.2 While the homelessness duty to provide accommodation is similar across all jurisdictions, the means by which it is discharged is different in Northern Ireland. In particular, the NIHE only uses social housing allocations under the Housing Selection Scheme approved by the Department to discharge its homelessness duty to provide accommodation. This means that, despite being permitted to do so by the Housing (Northern Ireland) Order 1988, the NIHE does not currently use allocations to the private rental sector to discharge its duty. A further difference is that this duty can be discharged in other jurisdictions by making households one reasonable offer of accommodation, whereas the Housing Selection Scheme allows two reasonable offers of accommodation to be made. The NIHE told us that the homelessness duty to provide accommodation is therefore likely to last longer in Northern Ireland compared with other jurisdictions, with corresponding implications for households requiring temporary accommodation.

Demand for temporary accommodation has increased significantly since our last report

3.3   The homelessness sector has undergone a number of significant changes since we last reported on this topic in 2017, in particular a surge in demand for temporary accommodation. Factors reported to us both from engagement with the NIHE and with third parties as part of this study included:

- **Impact of COVID-19 pandemic:** While there was a decline in the number of people presenting as homeless at the beginning of the pandemic and after the first lockdown, over the Covid period there was a significant spike in demand for temporary accommodation which has never receded. The introduction of restrictions on social contact, particularly household bubbles, meant that many informal housing arrangements for the previously "hidden homeless" ended quickly and more people needed temporary accommodation.

- **Impact of cost-of-living crisis**: Since 2022, increasing rates of inflation coupled with rising interest rates and rental inflation have impacted on rental and household costs, resulting in housing arrangements becoming unaffordable. Furthermore, the capacity of the private rental sector has also decreased, causing added disruption to private rental tenancies and increased reliance for the NIHE on more costly options for temporary accommodation. The financial landscape, particularly the lack of affordable housing, is also a key barrier to people moving out of homelessness. The Department told us that social housing is an attractive option for families whose household budgets are under stress, with good quality houses, secure tenancies and affordable rents. For households who are homeless, the duty is usually discharged through an allocation of social housing.

- **Freezes to Local Housing Allowance (LHA):** LHA determines the maximum amount of Housing Benefit someone renting in the private sector can receive, based on rent levels in their area and number of people in their household. At a time when private sector rents were increasing, LHA was frozen for four years until April 2024. This has made private sector rents comparatively less affordable than before, with a knock-on effect on the NIHE's homelessness duties, in particular temporary accommodation.

- **Increasing numbers of people with the right to remain in Northern Ireland presenting to homelessness services:** The Home Office has sped up its asylum decision-making processes in the last 18 months. It is likely that a significant proportion of those with leave to remain will require homelessness services, particularly temporary accommodation. As of January 2025, around five per cent of homelessness acceptances and 10 per cent of households in temporary accommodation were those with leave to remain in Northern Ireland. The NIHE told us that short notice periods for leave to remain decisions makes it is difficult to plan on a household-by-household basis, and that the acceleration in decision-making has led to increased demand for homelessness services and temporary accommodation.

3.4 The NIHE provided us with data on the number of households in temporary accommodation on the same night (1 April) for each year from 2017 to 2024. Placements in private single lets increased from 1,200 to 2,900; and placements in hostels increased from around 400 to over 1,200. The proportionate increase in hotels and B&Bs was by far the most significant, with nightly placements increasing from just 20 in 2017 to over 400 in 2024.

Figure 7: Use of temporary accommodation has increased by 176 per cent
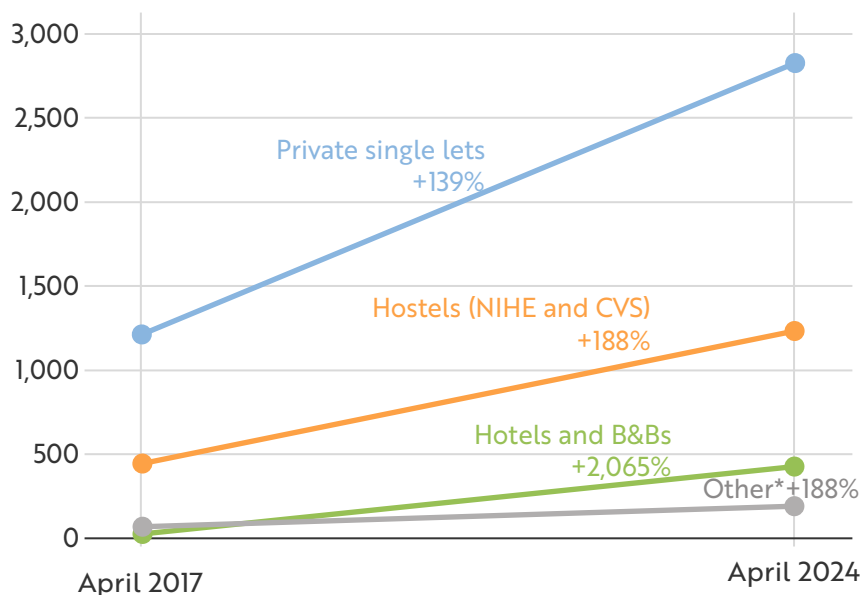
Source: NIHE internal data – snapshot at 1 April in each year
*Other includes DIME, bespoke and crash beds

3.5 Amongst these figures is an increasing number of children. In November 2024, 5,378 children were living in temporary accommodation. This is more than double the figure reported in January 2019. Most of these were in private single let accommodation (4,412), with around 700 in hostels and 240 in hotels and B&Bs. The NIHE told us that it has a target to limit the number of children placed in hotels and B&B accommodation to no more than two weeks, even though there is no legal obligation to do so, to enable it to focus resources on this issue. Consequently, numbers of children placed in this type of accommodation are significantly lower than in other jurisdictions, with less than two per cent of all temporary accommodation placements being families with children in hotels and B&Bs.

Figure 8: The number of children in temporary accommodation is steadily increasing

January 2019	2,433
January 2020	2,990
January 2021	3,315
February 2022	3,763
January 2023	4,236
April 2024	5,106
November 2024	5,378

Source: DfC, NI Homelessness Bulletin, December 2024

As demand for temporary accommodation has increased, so has use of non-standard accommodation such as hotels and B&Bs

3.6   The NIHE uses private single lets for the majority of its placements in temporary accommodation and has prioritised expanding its portfolio of this type of property though engagement and media campaigns with private sector landlords. However, even with this increase, the number of private single lets available has not been sufficient to keep pace with increasing demand. The NIHE's Homelessness Guidance Manual states that "placements in hotel/B&B accommodation should be on an emergency and exceptional basis only and should be reviewed on a daily basis." However, in order to fulfil its statutory accommodation duty, the NIHE has increased its use of non-standard accommodation which is predominantly in commercial hotels and B&Bs.

3.7   Analysis of the snapshot data provided by the NIHE shows that placements in hotels and B&Bs have increased by over 2,000 per cent since April 2017, compared to a 140 per cent increase in private let placements and 190 per cent increase in hostel placements.

Spending on temporary accommodation has increased significantly to address increased demand

3.8   Total gross NIHE expenditure on temporary accommodation has increased from £7.6 million in 2018-19 to £38.6 million in 2023-24, and temporary accommodation costs now represent over half of all NIHE gross expenditure on homelessness. The NIHE receives income in relation to temporary accommodation, mainly in the form of housing benefit. In 2023-24, the NIHE received £8.3 million of income, resulting in net temporary accommodation costs of £30.3 million. This significant increase in expenditure is driven by the demand for temporary accommodation units as outlined above, coupled with rising unit costs for temporary accommodation.

Figure 9: Temporary accommodation now represents half of all homelessness expenditure
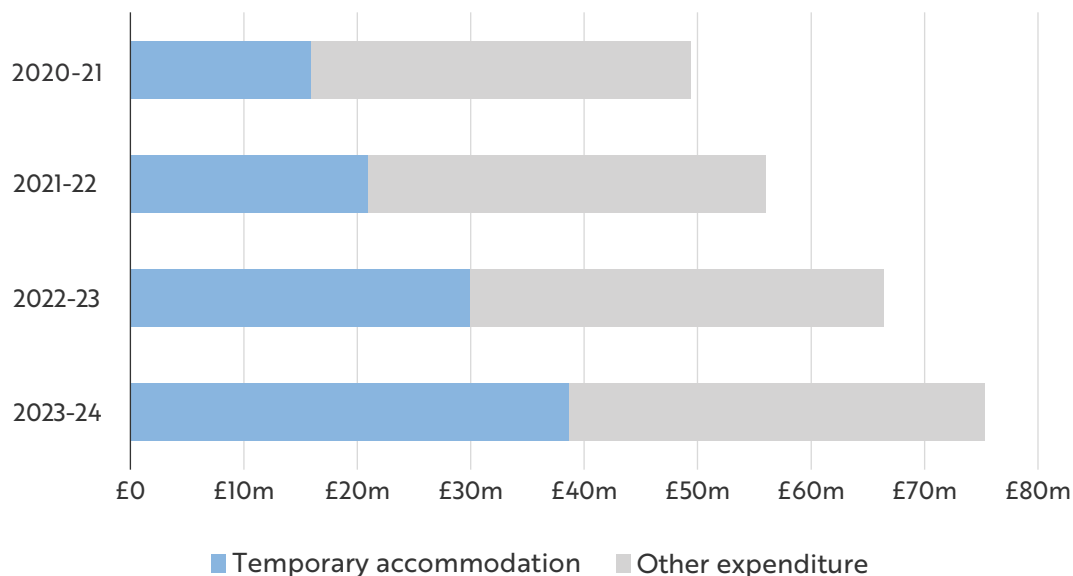
Source: NIAO analysis of NIHE financial information

3.9   The NIHE told us that its ability to meet demand and therefore control temporary accommodation costs is impacted by limited capital funding. This means it is currently unable to acquire properties or enter long term single-let leases at scale for use as temporary accommodation.   The Department stated that its capital funding priority is building new social homes through the Social Housing Development Programme and it has invested over £510 million in this priority over the last three years.

Hotels and B&Bs account for a disproportionate amount of temporary accommodation costs compared to placements

3.10   Hotels and B&Bs are the most expensive type of temporary accommodation used by the NIHE. Despite being used for around 10 per cent of households in temporary accommodation, hotels and B&Bs accounted for 32 per cent of the cost of temporary accommodation in 2023-24. Of the £38.6 million spent on temporary accommodation in 2023-24, £12.2 million was on hotels and B&Bs. This compares to just over £7.6 million in 2022-23 and £0.9 million in 2018-19, representing a thirteen-fold increase in expenditure on this type of accommodation.

Figure 10: Hotel and B&B accommodation cost the NIHE over £12 million in 2023-24
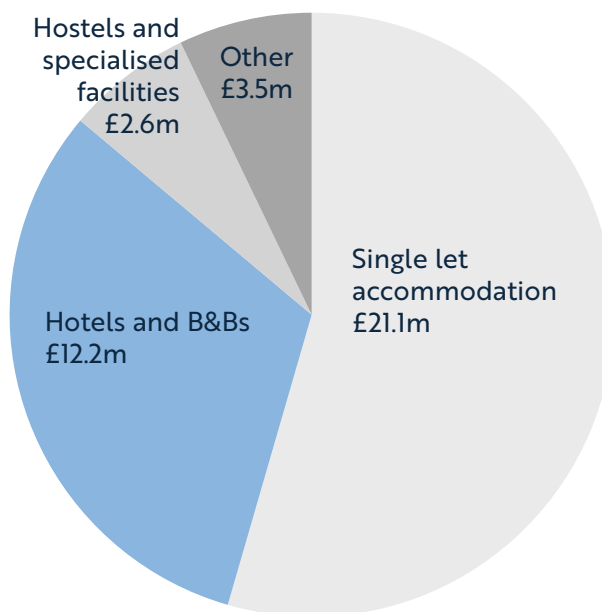
Source: NIAO analysis of NIHE financial information
Note: Other expenditure includes £2.8 million in taxi and furniture storage costs

3.11   Since 2018-19, unit costs for hotels and B&Bs have increased by over 40 per cent. Despite considerable efforts to reduce nightly rates in recent years, analysis provided by the NIHE shows that the weekly costs of hotel and B&B accommodation are now six times more than single let accommodation. The use of hotels and B&Bs is simply not cost effective and results in a significant amount of public money going to commercial, private sector businesses.

3.12   Despite the costs involved and the long-term use of temporary accommodation, the NIHE has only recently completed work, with the Centre for Homelessness Impact, on developing a value for money framework for temporary accommodation. The NIHE identified the need for such a framework as early as 2022, however it told us that the legacy impact of the COVID-19 response and the prioritisation of its statutory duties have delayed work on this project. The NIHE told us that the framework will be published imminently. The current reliance on and level of spending on commercial hotels and B&Bs does not represent value for money and is not financially sustainable. In this context the NIHE must continue to prioritise action to bring this spending under control, and seek more cost-effective forms of temporary accommodation such as leasing and acquisition.

Recommendation 2

The NIHE should continue to seek ways to minimise its reliance on hotel and B&B accommodation and reduce its spending on this type of accommodation. It should ensure that a timebound action plan to implement the value for money framework is established and that the Board monitors its progress.

Processes and controls around hotel and B&B accommodation have improved and should be formalised

3.13   There are three main processes by which the NIHE secures hotel and B&B accommodation:

- **Block booking** arrangements exist for around 10 per cent of bed spaces on any given night and are considered first when there is a need for non-standard accommodation. Block booking arrangements were first set up during the COVID-19 response, to secure additional accommodation and ensure stability of supply at a time when many hotel and B&B providers paused trading in the pandemic. Rates were negotiated when these properties were added to the portfolio and rebooked on a rolling monthly basis. Payments include a small number of void periods. Where rate uplifts are requested, these must be approved by NIHE's Executive Team.

- Placements in properties which are "**routinely used at scale**". This is the most common type of booking arrangement and nightly rates are negotiated in advance and invoiced to the NIHE.

- **Placements by the Out of Hours Team**, usually at short notice. These are predominantly "pay as you go" credit card bookings, paid at market rate, and must be approved by a sufficiently senior member of the management team.

3.14   The NIHE told us that although there are no formally documented controls for the "routinely used at scale" category of properties, these have evolved considerably since the COVID-19 pandemic. It recognised the need for more standard processes, controls and consistency over this type of expenditure and established a Non-Standard Rationalisation Group in October 2023. This group comprises members from Homeless Projects Team, the Out of Hours Service and the three regional teams who consider non-standard accommodation proposals and take decisions on exiting from existing accommodation. A set of principles to guide decision-making on non-standard accommodation has recently been agreed by the Group. Factors to be considered include scale, location, standard and the value for money compared to other properties in the same area.

3.15   The establishment of this group has led to several improvements including a review of pricing leading to the NIHE exiting a number of properties as they were not providing value for money. Spot checks on properties are completed on a periodic basis each year to ensure that the number of beds paid for matches the number of occupants on site. Daily control reports are issued to each area detailing current placements in non-standard accommodation requiring review by a Designation Officer and sign-off by a Team Leader as appropriate. The NIHE considers that these actions have contributed to the reduction in the average nightly rate paid for non-standard accommodation at a time when demand and placements are increasing.

3.16   The NIHE told us that these processes are not formally documented, the Non-Standard Rationalisation Group does not have official Terms of Reference and that elements of the process are still somewhat fragmented. Given the considerable and ongoing need for hotel and B&B accommodation and the significant efforts the NIHE has made to improve controls over this expenditure, it is important that these processes are now formalised and documented to ensure that they can be implemented consistently.

Recommendation 3

The NIHE should formalise and document its processes and controls over both block booked and routinely used non-standard accommodation, incorporating findings from the value for money framework.

Temporary accommodation is not temporary for most people

3.17   Data on the average length of stay in each type of temporary accommodation shows that this has risen steadily in the last five years. Most placements in temporary accommodation (around 63 per cent) are now longer than six months. In April 2024, 44 per cent of households had required temporary accommodation for more than a year and six per cent for more than five years. The NIHE also told us that for those in the April 2024 snapshot (Figure 7) the average length of stay in temporary accommodation was 561 days (18 months). Households may be placed in a number of different properties during their time in temporary accommodation.

Figure 11: The length of stay in temporary accommodation is increasing
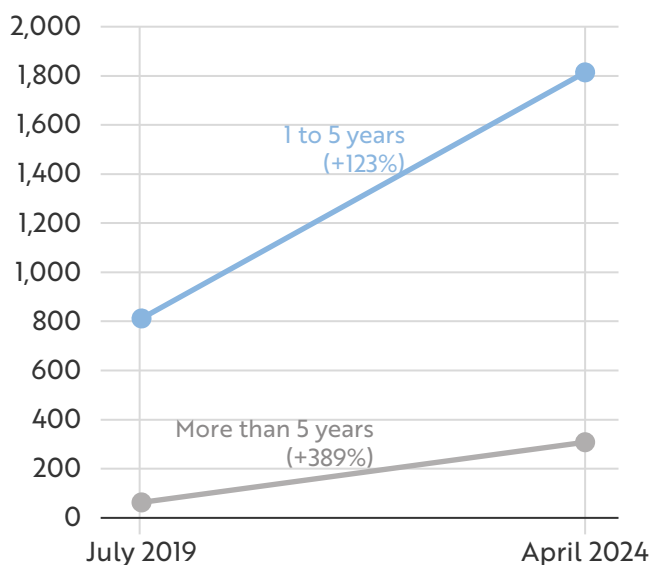
Source: DfC NI Homelessness Bulletin, June 2024

3.18   Given the NIHE's legal duty to provide temporary accommodation, there is always likely to be a need for short-term temporary accommodation when households approach the NIHE and need somewhere to stay during the homelessness assessment period. However, it is clear that the majority of those in temporary accommodation are there because of a lack of suitable, permanent move-on solutions, and hence stays in temporary accommodation can last for months or even years, increasing the financial burden on the NIHE.

Standards of temporary accommodation vary considerably

3.19   Northern Ireland does not have specific regulations or standards for temporary accommodation, unlike in other jurisdictions. The 'Strategic Review of Temporary Accommodation', a report published by Campbell Tickell in 2020, performed a comparative review of accommodation duties of national governments and local authorities in the UK as a whole, including the existence and application of housing standards specifically for temporary accommodation. Participants in stakeholder consultation performed as part this review reported that standards vary across different types of temporary accommodation, noting that in their view standards can be lower in some single lets, while others in new build developments are of a very high standard. No subsequent reporting or consultation on housing standards for temporary accommodation has been completed. The NIHE told us that it has committed to commissioning work with customers and providers to agree standards for temporary accommodation as part of the Strategic Action Plan for Temporary Accommodation.

The increased demand for temporary accommodation is not unique to Northern Ireland

3.20   As noted at the start of this chapter, there are different legal obligations with regards to the temporary accommodation duty throughout the four UK jurisdictions, therefore direct comparisons are difficult. However, it is clear that each region has experienced significant increases in demand for temporary accommodation since the COVID-19 pandemic.

3.21   In England, in December 2023, there were more than 112,000 households in temporary accommodation, representing a 12 per cent increase compared to the previous year and a 27 per cent increase from the position in pre-pandemic data. In Scotland, the latest position in September 2023 showed almost 16,000 households in temporary accommodation, an 8 per cent increase on the previous year and a 32 per cent increase compared to before the pandemic. Similarly, in Wales, the number of households in temporary accommodation on 30 September 2023 was 5,700, which was a decrease on the previous year but was an increase of more than 100 per cent from 2019.

The NIHE has recognised that the demands on temporary accommodation are not sustainable and has taken a range of actions to address this

3.22   In 2022, the NIHE launched the Strategic Action Plan for Temporary Accommodation (SAPTA), which directly supports the achievement of the vision of the Homelessness Strategy. The SAPTA identified four key criteria for success:

- Minimised need for temporary accommodation.

- Customers receive appropriate accommodation and support at the point of need.

- Customers moving on from temporary accommodation sustain their tenancies.

- A sustainable supply of good quality, affordable temporary accommodation, which is safe, warm and well managed.

3.23   There are a number of action points arising from outworkings of SAPTA, including:

- There is work ongoing with an external supplier to develop a long-term leasing model for temporary accommodation.

- The NIHE has undertaken work to reduce its dependence on hotel accommodation, with a focus on increasing lease accommodation. This will not only reduce costs but is also more suitable for families.

- The NIHE has undertaken specific and targeted calls for landlords to try to increase the availability of single let supply specifically for temporary accommodation. An exercise in April 2024 identified 80 single let units which were subsequently made available for temporary accommodation.

3.24   The NIHE has committed to producing an annual report outlining delivery of actions within the SAPTA. To date, while two action plans have been published, there has been no publicly available review of progress towards actions within these. We also found that many of the actions in the SAPTA duplicate those in other strategic action plans and, in the absence of a meaningful assessment and reporting mechanism, it is unclear whether actions have been successful. Since September 2023, the NIHE Chief Executive has chaired a Task and Finish Group with a number of workstreams aimed at addressing temporary accommodation demand. The NIHE told us that this group has been a key lever to driving its work in delivering a sustainable approach to temporary accommodation.

3.25   Revitalisation of the NIHE and work on voids discussed further in Part Four may also have a positive impact on the operation of temporary accommodation. However, reducing demand for homelessness services through prevention and increasing the supply of social housing are key sustainable solutions to reducing both the waiting list and demand for costly temporary accommodation.

Recommendation 4

The NIHE should complete and publish a review of the Strategic Action Plan for Temporary Accommodation, including an assessment of the extent to which actions have been completed and indicative timeframes for remaining actions. This review should also identify areas to prioritise and those where further action or funding is required.

Part Four:
Impact of housing supply

Part Four: Impact of housing supply

Adequate housing supply is key to addressing homelessness

4.1   It is accepted that there is a requirement for new homes of all tenures across both the UK and the Republic of Ireland. Whilst homelessness is not only a housing issue, alongside prevention, the provision of an adequate supply of affordable and social housing is fundamental to addressing homelessness.

There are a number of stakeholders involved in social housing planning and development

4.2   The NIHE does not currently have the financial means to raise the levels of capital required to build widespread social housing. Instead funding is provided by the Department for RHAs to deliver new social housing via the Social Housing Development Programme (SHDP).

4.3   The SHDP is a three-year rolling programme of planned social housing construction and provision in Northern Ireland. The SHDP process is managed by the NIHE who provide grant funding to RHAs for them to build or buy new social housing. As the Regional Housing Authority, the NIHE is responsible for the identification and analysis of housing needs, and for formulating an SHDP which ensures that RHAs are appropriately directed to meet identified housing needs within the allocated budget.

4.4   The NIHE states that 'an integral part of the Social Housing Development Programme' is the Commissioning Prospectus which it publishes on an annual basis. This document provides RHAs, developers and other interested stakeholders with detailed information about the requirements for the provision of new social and affordable housing throughout Northern Ireland. The five-year projected social housing need reported in the Commissioning Prospectus over the period 2023-28 is 24,922 units. Projected housing need is calculated by undertaking a location-specific assessment of market issues and housing need in the area, including consideration of the social housing waiting list and allocations made.

4.5   The Commissioning Prospectus is intended to ensure a transparent and evidenced-based approach to equitably allocate new social housing towards those areas with the greatest intensity of housing need.

4.6   In June 2022 a Strategic Housing Market Analysis (SHMA) commissioned by the NIHE reported projected future housing requirement over the 15-year period 2020 to 2035 by tenure type (private, intermediate and social). This is intended to inform the preparation of Local Development Plans by each local government district. The SHMA is based on a number of considerations, including net growth in the number of households, and unmet need between current housing provision and accommodation needs of existing households. Based on assignment of a certain percentage of housing requirement across each of the tenure types, the SHMA projected an annual social housing requirement of 1,690 units.

4.7   In December 2024 the Minister for Communities launched the Northern Ireland Executive's Housing Supply Strategy 2024-2039. This sets an ambition to deliver at least 100,000 homes, with one third being social houses, over 15 years. The Strategy points to growing affordability problems and a widening of the gap between supply and demand as challenges to be tackled by transformational change, and its first objective is to increase housing supply and affordable options across all tenure types. Nonetheless, while the strategy has a stated ambition, it does not contain a specific target for the number of new social houses each year.

4.8   RHAs are responsible for: identifying sites suitable for social housing; for the planning and development of scheme proposals; and for construction of new social houses as part of the SHDP. Delivery of new social housing is subject to a number of capacity implications including:

- Availability of suitable sites which represent value for money, with required planning approvals, in areas of identified social housing need.

- Risk appetite and strategic determinations of RHAs regarding new build development.

- Wider infrastructure and building market considerations.

- Economic drivers, such as inflation and the availability of finances.

4.9   In recent years, annual targets for the delivery of new social houses as part of the SHDP have been informed by the draft Programme for Government (PfG) 2016-21, which included a target of an additional 9,600 social homes over its lifetime. As a consequence of the COVID-19 pandemic, an in-year target of 1,850 social houses was agreed for the final year of the PfG in 2020-21. With no subsequent PfG targets in place from 2021, the NIHE and the Department agreed to gradually increase the SHDP target year on year by 50 social houses from a baseline of 1,850.

4.10   The NIHE told us that the projected social housing need outlined in the annual Commissioning Prospectus, the annual social housing requirement reported in the June 2022 SHMA, and the ambition of the recently published Housing Supply Strategy are all considered when determining appropriate SHDP targets.

4.11   However, the SHDP works within an annual budget cycle, with the NIHE submitting funding bids to the Department for the delivery of the SHDP target which has been determined. For years in which the Department is unable to provide the required level of funding, the SHDP target is subsequently revised to reflect funding available.

Targets for the number of new social housing units fall considerably below projected need

4.12   The SHDP targets are less than the level of projected social housing need reported in the Commissioning Prospectus.

Figure 12: SHDP targets for new social housing

2024-25	2,000 units
2025-26	2,150 units
2026-27	2,300 units
Total	**6,450 units**

Source: Commissioning Prospectus Social and Intermediate Housing Requirements for the period 2024-25 to 2026-27

4.13   Even these targets are unlikely to be achieved. In 2023-24 , the NIHE sought funding for 2,000 social housing new starts. It was allocated funding for 1,500 new starts and thus the target was reduced to reflect this. In 2024-25 the NIHE bid for 2,000 starts, however the initial funding allocation was only able to support just over 400 new starts. As more funding was allocated to the NIHE during 2024-25, in excess of 1,400 new homes are expected to start, representing a shortfall of 600 from the target reported in the Commissioning Prospectus.

4.14   The increase in SHDP targets for new social housing in recent years has failed to keep pace with the increase in projected need per the Commissioning Prospectus. Over the period from 2017-18 to 2022-23, the projected social housing need has increased by 64 per cent, whereas the SHDP target for new social housing has only increased by 11 per cent. This position regressed further for 2023-24 and 2024-25 due to the reduction of SHDP targets outlined above.

Figure 13: The increase in SDHP social housing targets has not kept pace with projected social housing need

	2017-18	2022-23	Percentage Increase
Five-year projected need (Commissioning Prospectus period)	14,374 (2017-22)	23,577 (2022-27)	64%
Annual SHDP target	1,750	1,950	11%

Source: NIHE Response to Department for Communities Budget 2024-25 Equality Impact Assessment

4.15   Reporting delivery against an SHDP target which does not fully reflect social housing need overlooks complexities and constraints in the provision of new social housing. Transparent reporting of social housing need, capacity constraints, funding constraints and the SHDP target subsequently determined will allow the shortfall in housing requirements to be identified and meaningfully addressed. In the absence of sufficient new supply, the number of FDAs on the social housing waiting list will continue to grow, perpetuating the issues outlined in Parts Two and Three.

Recommendation 5

The Department and the NIHE should work together to develop reporting on Social Housing Development Programme targets to record the shortfall between unmet social housing need per the NIHE's Commissioning Prospectus and the number of new starts which can be delivered as determined by the Department. The shortfall should be further analysed between funding and capacity constraints which are present.

Social housing supply is failing to meet demand

4.16 The number of FDAs on the social housing waiting list has increased from 16,400 in 2016-17 to over 29,000 in 2023-24. The number of new social housing starts has not kept pace with this level of demand and the social housing waiting list continues to grow each year.

Figure 14: Social housing new starts are not keeping pace with the growing number of FDA households on the social housing waiting list
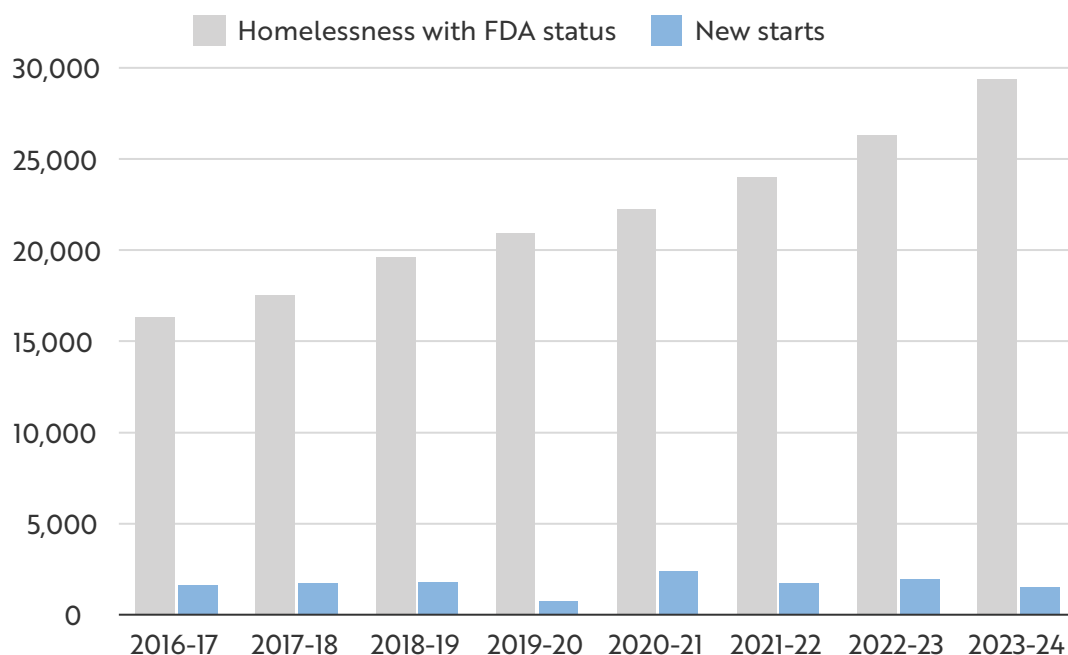
Source: NIAO analysis of SHDP delivery against Strategic Guidelines Report and DfC social housing waiting list statistics

Social housing stock has reduced due to 'Right to Buy' schemes

4.17   The Housing (Northern Ireland) Order 1983 (1983 Order) required the NIHE to prepare and submit to the Department a House Sales Scheme for its tenants. Further, as amended by the Housing (Northern Ireland) Order 2003, the 1983 Order required the Department to draw up a House Sales Scheme for tenants of RHA properties. Under each House Sales Scheme, tenants of social housing landlords have the right to buy their homes at a discount if they meet certain eligibility criteria. The discount available is dependent on how long the applicant has been a tenant, with the maximum discount being the lower of £24,000 or 60 per cent of the market value of the property. Following repeal by Housing (Amendment) Act (Northern Ireland) 2020, the House Sales Scheme for tenants of RHA properties closed in August 2022. However this repeal did not extend to the House Sales Scheme for tenants of NIHE properties, with the 1983 Order continuing to require the NIHE to have such a scheme in place.

4.18   Over 3,200 social houses have been sold under the House Sales Schemes since 2017 (Figure 15). This represents 30 per cent of the number of new starts in the same period which will not be replaced. The sale of these houses reduces the availability of social housing stock at a time when the number of FDAs on the social housing waiting list continues to grow. Indeed, the protection of social housing stock available for social renting was the reason cited by the Scottish and Welsh Governments for their abolition of its 'Right to Buy' schemes in 2016 and 2019 respectively.

Figure 15: In most years, sales of social housing stock offset a sizeable proportion of social housing new starts
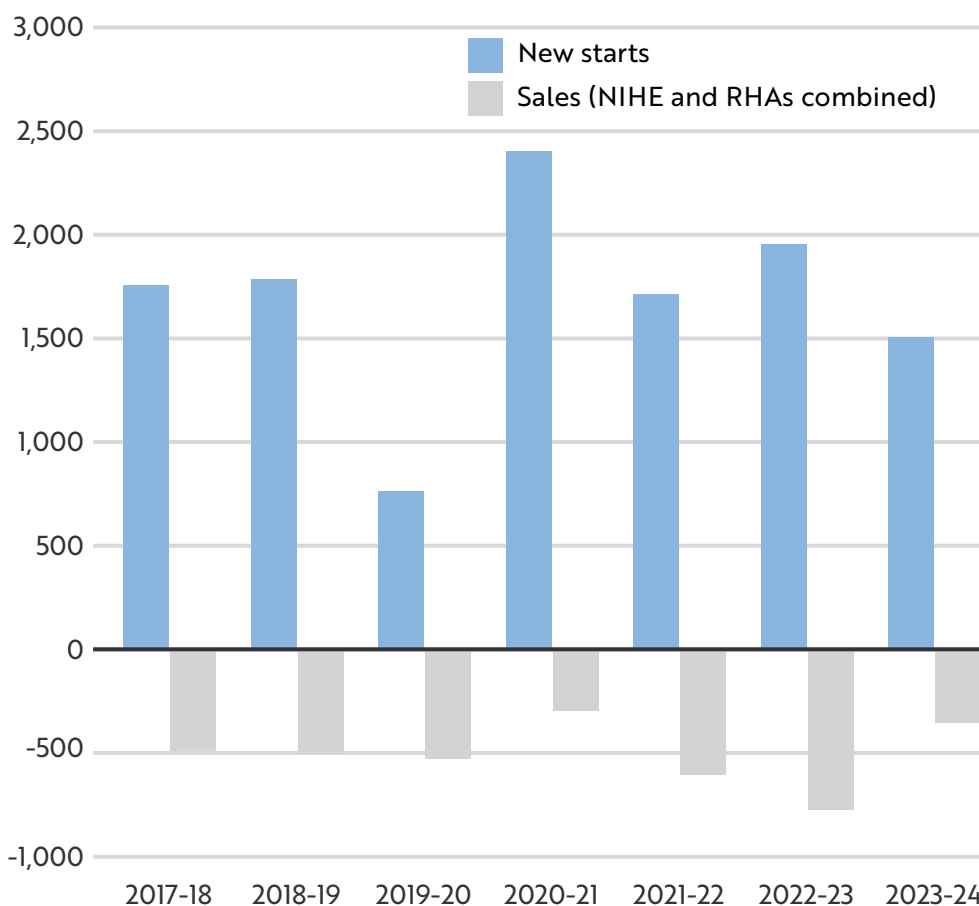
Source: 2017 to 2023 data sourced from Departmental Statistics, 2023-24 data sourced from NIHE

There are a number of unoccupied social houses

4.19   Void properties are social houses that are not currently occupied. There can be a number of reasons for voids including that the property is in the process of being re-let. The NIHE categorises voids as:

- **Non-actionable voids:** those that are not immediately available for allocation and are held vacant for operational purposes. For example, because the property is inhabitable, is being used to house a tenant on a temporary basis pending works to their home, has been identified for sale/transfer, or has been approved for demolition.

- **Actionable voids:** those which are vacant while in the process of being allocated or awaiting change of tenancy repair. These may include properties deemed difficult to let.

4.20   The number of voids under each category naturally fluctuates between each reporting period as the units become vacant or are leased. At the end of February 2024, the NIHE recorded 1,639 actionable voids and 1,016 non-actionable voids within its own stock. In its most recent Annual Report, the NIHE stated that in 2023-24, the re-let time was an average of 29 days.

4.21   RHAs also have void levels within their stock. The Department provides advice to RHAs in relation to voids through its Housing Association Guide. Within the Guide, a section on Void Management states that '*no more than 4% of an Association's total stock should be void. It is essential therefore, that there is effective management of void properties and this is afforded a high priority by all*'.

4.22   The Department provided us with the most up-to-date information regarding voids in RHAs which is publicly available. The documentation shows almost 80 per cent of RHAs had average re-let times in excess of the 29 days achieved by NIHE, and void levels vary considerably by RHA, ranging from 0.2 per cent to over 16 per cent. The number of voids in RHAs for the period 2022-23 was 1,543 units, with 730 of these being classified as lettable self-contained properties. Analysis of the 730 self-contained properties shows that 439 (60 per cent) have been void for over six weeks, including 157 properties which have been void for over six months.

Figure 16: The majority of voids in RHA self-contained properties exceed six weeks

Void time	RHA self-contained lettable voids in 2022-23	
	Number	%
Less than six weeks	291	40
Six weeks to six months	282	39
Six months to one year	81	11
More than one year	76	10

Source: : NIAO analysis of the Key Performance Report 2022-23 for each RHA

Monitoring and management of void properties is inconsistent

4.23   NIHE voids are reported on a quarterly basis and published in its Annual Report, with the Department monitoring performance against the NIHE's Key Performance Indicators (KPIs). RHA voids are only reported on annual basis through each provider's individual key performance report to the Department.

4.24   At a time of unprecedented demand for social housing and expenditure on temporary accommodation, it is imperative that voids within housing stock are managed efficiently to ensure they are brought back into use as quickly as possible and are available for allocation from the social housing waiting list. Where this does not happen for some RHA voids in the medium to long-term, the use of these RHA properties to meet short-term temporary accommodation demand could be an effective option which would allow the NIHE to reduce its costs in a sustainable way. We are aware that engagement between the NIHE, the Department and RHAs to explore the possibility of using void properties as short-term temporary accommodation has taken place since November 2023, with the NIHE subsequently using a small number of voids within three RHAs for this purpose. However, efficient management of voids is only feasible if there is consistent and regular monitoring and oversight of voids across both the NIHE and RHA sectors.

Recommendation 6

The Department should identify options to establish a more robust, consistent and regular monitoring system for all void Registered Housing Association properties.

Recommendation 7

The NIHE should expand its collaboration with Registered Housing Associations and aim to agree an action plan to maximise the use of medium to long term void Registered Housing Association properties for temporary accommodation, similar to how it currently uses its own long-term voids for temporary accommodation.

The social housing allocation system is undergoing a period of change

4.25   In 2013, the Department launched a review to improve how social homes are allocated in Northern Ireland. This review included consideration of the Housing Selection Scheme and the allocation process, which had been in place since 2000. The review resulted in 20 proposals which underwent public consultation in 2017. Following consultation, it was decided that 18 of the 20 proposals would be advanced and the remaining two proposals, related to intimidation points and interim accommodation points, required further investigation. The NIHE is responsible for implementing the proposals through the Fundamental Review of Allocations Implementation Project.

4.26   Implementation of project proposals commenced in January 2023, almost a decade after its launch, and is due to conclude in 2026. Changes relevant to homelessness include:

- An applicant will receive two reasonable offers of accommodation, reduced from three, following which no further offers will be made for one year after the date of the last refusal.

- A removal of the limit on the number of areas of choice which can be requested by an applicant.

- All applicants and transfers on the social housing waiting list will be reassessed to ensure their points still accurately reflect their circumstances.

- The NIHE can meet its full housing duty on a tenure neutral basis (presently, the custom and practice of the NIHE is to discharge its duty to the social housing sector). This would result in more units in the private sector being available for the NIHE to discharge its duty.

- Investigating alternative approaches for the award of points to applicants in any form of temporary accommodation and not just to those in interim accommodation.

- Amendments to existing Housing Selection Scheme Rules (HSS) so that there is more flexibility around social landlords designating a property as 'difficult to let' and what rules apply to allocating these properties.

4.27   Some of the above proposals are not yet at implementation stage. For others, it is too early to properly assess the impact measures have had on homelessness services. However, the NIHE has reported that the implementation of the reduction in reasonable offers and increasing the number of areas of choice have reduced the time and resources taken to allocate properties to those on the waiting list.

Some work is ongoing to address current issues and plan for future challenges

4.28   The NIHE's ability to effectively maintain and increase the supply of social housing is limited by the rate of rental income set, which is outside of its control, and its inability to borrow money from private finance to fund development schemes. In November 2020, the then Minister for Communities announced that the Department would explore options to revitalise the NIHE so that it would have the power to leverage investment and to enable it to contribute directly to housing supply. The NIHE Revitalisation Project followed, and in March 2021 a Housing Executive Revitalisation Programme board was established by the Department. A Strategic Outline Case for revitalisation of the NIHE was approved in December 2021 and an Outline Business Case was presented to the Minister for consideration in February 2022. The subsequent collapse of the Northern Ireland Assembly meant that no further announcements were made in relation to the project. However, at a meeting of the Assembly's Committee for Communities in April 2024, the Minister for Communities stated that the Department was 'actively pursuing options' in relation to NIHE funding models.

4.29 In February 2023, the Land Asset Management Strategy was approved by the NIHE Board and has since implemented Year 1 of the action plan associated with that strategy. The Department approved a Business Case for a Housing Executive Land Acquisition Project. The aim of this pilot project is to identify and acquire land in public ownership and to support continued development of social housing through the SHDP.   The pilot project aims to deliver 100 homes over a three-year period.

4.30 There are also a number of recent initiatives which were introduced in an effort to improve availability of social housing supply:

- The Department implemented a low interest loan initiative which offers homelessness sector charities in Northern Ireland access to finance to purchase and manage affordable accommodation for individuals who are deemed 'tenancy ready' but may need some support to access or maintain the tenancy. The programme 'will focus on areas where excessive or inappropriate use of temporary accommodation has been identified', with the aim of providing 80 to 100 units over five years to reduce pressure on temporary accommodation demand and the associated cost savings.

- The Department launched an Intermediate Rent scheme to provide a private sector operator with a long-term low-interest government loan for the delivery of affordable homes for rent. An operator is in process of being appointed to deliver 300 new homes under this scheme.

Other jurisdictions are reporting similar shortages in supply

4.31 Other jurisdictions face similar challenges in relation to housing supply, in particular social housing supply and funding constraints impacting on the ability to meet demand. Research published by the Economic and Social Research Institute has indicated that growing populations in both Ireland and the UK have led to higher levels of overall housing demand, with supply struggling to catch up. The research also reflected that over the full period, '*all markets have experienced a significant fall-off in housing that is publicly provided*':

- In Scotland, housing association (2,073) and local authority (1,192) new starts in 2023 were at their lowest numbers since 1988 and 2013 respectively. Scotland has also experienced difficulties in terms of budget allocation for new social housing starts, with the affordable housing budget having been decreased by 26 per cent.

- In Republic of Ireland, data in relation to new builds, acquisitions and leases shows on average over 8,000 new social houses have been delivered each year between 2017 and 2023, but not reaching the target number since 2018.   In 2023, there were 11,939 new social housing units, which was also 1,191 below the target set.

- In Wales, published data relates to additional affordable housing units delivered and may include acquired properties as well as new builds. In 2022-23, a total of 3,369 additional affordable housing units were delivered. This represented an increase of 26 per cent on the previous year and the second highest total since data was first recorded. A recent study by Audit Wales reported that on current estimates, it is unlikely that the Welsh Government will meet its affordable housing supply target by 2026 as planned.

- In England, the number of new houses in the social rented sector has decreased significantly in recent years. After a year-on-year increase from 2004-05 to almost 40,000 new houses per year, the number of new social houses fell significantly in 2012-2013 and has remained at under 10,000 houses for the last number of years.

Part Five:

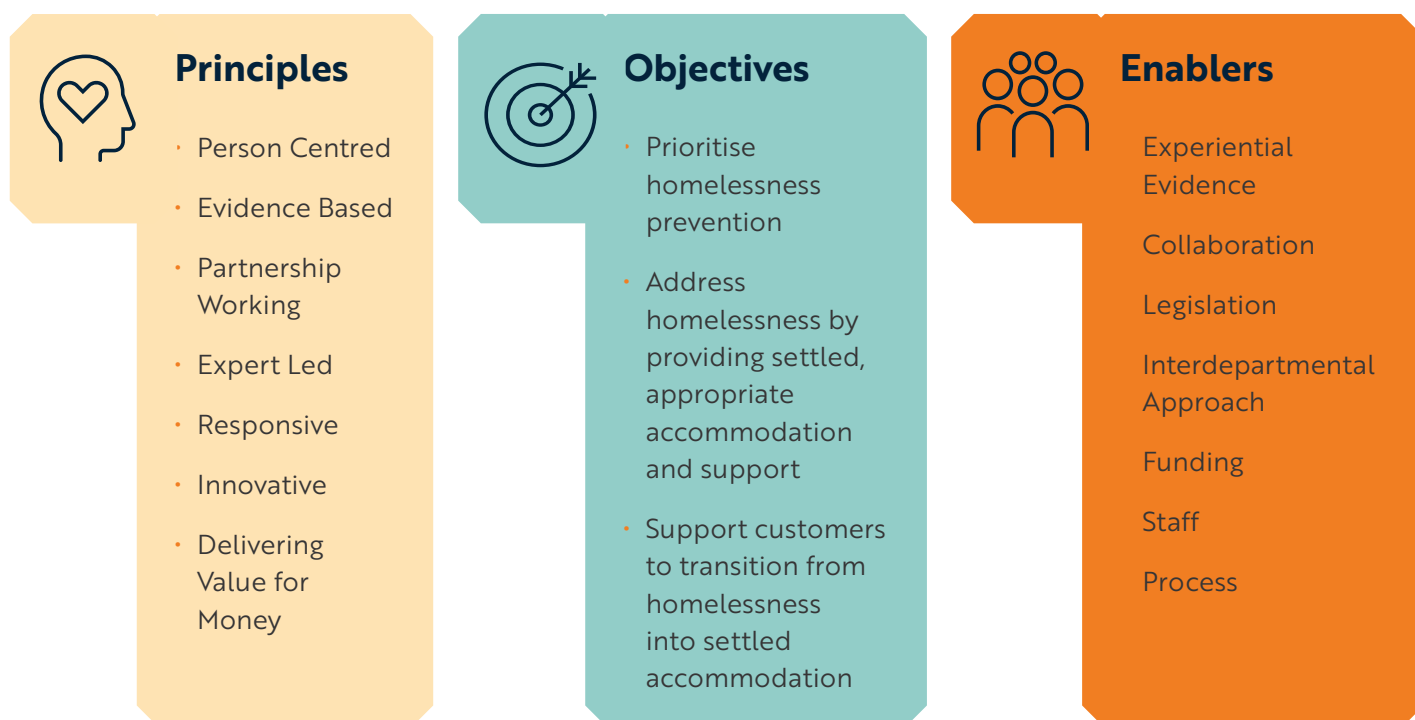# Governance and accountability arrangements

Part Five: Governance and accountability arrangements

Since 2012, there have been three Homelessness Strategies, and a range of supporting action plans underpinning homelessness services

5.1   The Homelessness Strategy period fell within the previous draft Programme for Government (2021). The outcome 'We have a caring society that supports people throughout their lives' included tackling homelessness as a key priority area, with responsibility falling to the Department and the Department of Finance. The most recent Programme for Government (2024-2027) includes a specific housing priority: 'Provide more social, affordable and sustainable housing'.

5.2   The NIHE publishes a new Homelessness Strategy every five years in line with the statutory power laid down by Article 6A of the Order. Since 2012, there have been three Homelessness Strategies:

- **2012-17:** Homelessness Strategy for Northern Ireland

- **2017-22:** Ending Homelessness Together

- **2022-27:** Ending Homelessness Together

Since 2012, strategies have had a strong prevention focus. The most recent Homelessness Strategy, published in March 2023 contains seven principles, three objectives and seven enablers.

Figure 17: Extract from 2022-27 Homelessness Strategy

Principles
- Person Centred
- Evidence Based
- Partnership Working
- Expert Led
- Responsive
- Innovative
- Delivering Value for Money

Objectives
- Prioritise homelessness prevention
- Address homelessness by providing settled, appropriate accommodation and support
- Support customers to transition from homelessness into settled accommodation

Enablers
- Experiential Evidence
- Collaboration
- Legislation
- Interdepartmental Approach
- Funding
- Staff
- Process

Source: NIHE, Ending Homelessness Together, Homelessness Strategy 2022-27

Progress towards achieving strategic objectives has been limited

5.3   The most recent Homelessness Strategy stated the NIHE 'will report on progress in the delivery of the Strategy in an annual progress report'. As of early 2025, two annual progress reports have been published. We have reviewed the published reports and note that while a range of actions are outlined, there has been limited progress towards delivering improvements on indicators that guide the three key strategic objectives. Indeed, all but one of the indicators have either regressed or baselines have just been recently established.

Figure 18: Progress towards strategic homelessness objectives is limited

Objective	Indicators	Year 2 outcomes
1. We have support that prevents us from becoming homeless	• Number of households presenting as homeless • Number of households accepted as FDA • Number of cases recorded as prevention	• Increase of 7.5% from baseline • Increase of 13.8% from baseline • Baseline established in 2023-24
2. We live in suitable homes	• Average length of time spent in temporary accommodation • Number of households placed in temporary accommodation • Number of FDA duties discharged	• Increase of 11.1% from baseline • Baseline recorded from 2022-23, 9.1% increase • Decrease of 0.78% from baseline
3. We have support that prevents us from becoming homeless	• Number of instances of repeat homelessness • Number of applicants experiencing chronic homelessness	• Decrease of 10.9% from baseline • Criteria recently agreed, baseline will be recorded from 2024-25

Source: NIAO review of NIHE Year 2 Annual Progress Report

5.4   In our 2017 report, we recommended that the "NIHE systematically evaluates performance in dealing with homelessness against its objectives and regularly reports progress to the Board and other key stakeholders." We do not consider that this recommendation has been implemented fully. It is concerning that the baseline for the key strategic objective of prevention was not established until two years into the Strategy, and that another of the indicators has only recently had a definition agreed.

Annual action plans are not clearly aligned with strategic objectives

5.5   The Strategy is supported by an annual Homelessness Strategy Action Plan. The Year One Action Plan contained 44 actions.   The Year Two Action Plan contained 42 actions similarly categorised, which seek to enable implementation and achievement of the objectives. The Year Three Action Plan contains 46 actions. The Department told us that it has an opportunity to comment on the draft actions before they are approved and that it has regular engagement with the NIHE to discuss the actions.

5.6 Our review of the action plans highlighted a number of issues:

- Actions which are largely operational, rather than being clearly aligned with strategic objectives and which are therefore unlikely to have a significant impact on homelessness. Examples include a review of internal NIHE policies and procedures, development and delivery of internal training programmes for staff and communicating performance and budgetary information in user friendly formats.

- The majority of actions (29) are enabling actions, with fewer actions that are directly linked to the three core strategic objectives, and do not contain expected outcomes.

- Many actions have carried over from Year One, with limited progress to date.

- A number of actions are reliant on additional funding, therefore they are potentially not achievable.

  The NIHE told us that it was the intention that some actions would span multiple years. It is not clear which actions this refers to. It is concerning that halfway into the strategic period, very few of the actions have been fully achieved and the list of actions each year continues to grow, with little evidence of review of their achievability. Action plans should be reviewed to ensure that they are sufficiently achievable, realistic and aligned with the three core strategic objectives.

5.7 In our 2017 report, we recommended that the NIHE establish KPIs in line with the SMART framework, which measure overall success. The NIHE has five KPIs associated with homelessness services. Whilst the KPIs represent an improvement on the previous position, the most recent NIHE Annual Report and Accounts outline that there has been limited progress against most KPIs, with only two of five fully achieved. Three of the five KPIs were stalled by a lack of funding.

Figure 19: An NIAO review of the NIHE's homelessness KPIs shows most were not fully achieved

KPI	2023-24 progress
Continue to support and make the case for sustained and targeted funding for homelessness (£2 million) prevention projects to deliver innovative housing solutions for our customers (subject to funding).	**Achieved**. The NIHE assessed this KPI as achieved as it continued to submit bids for prevention funding. The NIHE told us that it was considered important to retain a KPI for targeted prevention funding, even if it only related to making a case for funding. **We do not consider this KPI relates to a measurable homelessness outcome and note the NIHE was unable to deliver a Homelessness Prevention Fund for 2023-24 as there was insufficient funding.**
Work to identify and increase stock available against baseline to use as temporary accommodation including through a leasing model in private sector accommodation and Housing Executive Stock (Target of 50 by end of Q4).	**Achieved**. Stock available for use as temporary accommodation increased through the acquisition of additional single lets, with a net increase of 167 active single lets on the portfolio since the beginning of June 2023.
Increase the Housing First model in Northern Ireland by 25 per cent increase from baseline, including through our work on the 'Complex Lives' project (subject to funding).	**Not achieved**. No increase due to funding constraints. The NIHE did not deem it appropriate to assess this KPI with a RAG status.
End the use of bed and breakfast and hotel accommodation (excluding self-contained units) as temporary housing for children for more than two weeks.	**Not achieved**. Placements into temporary accommodation increased by 10.9 per cent and the target was not met. This KPI was assessed as Red by the NIHE.
Continue to deliver the Lived Experience Programme to include regular engagement with lived experience clients to better understand their needs and improve our services.	**Partially achieved**. The NIHE continues to work with Homeless Connect in the delivery of Lived Experience Groups. There was significant effort to develop an outline for a Lived Experience Programme in the absence of funding during 2023-24.

Source: NIAO analysis of NIHE Annual Report and Accounts 2023-24
Note: Achievement of KPIs refers to NIAO assessment

5.8   KPIs are monitored at Executive and Board level within the NIHE. At Executive Level, they are monitored monthly by the Executive Team, chaired by the Chief Executive at the monthly Performance Review Committee. Homelessness, and in particular failure to meet statutory duties owed to homeless households and failure to control budget for temporary accommodation, is reported as a principal risk to the NIHE and is reviewed by the NIHE's Board, Audit and Risk Assurance Committee and Executive Team on an ongoing basis. Demand and budget for homelessness services are also reported as key issues in quarterly assurance statements presented to the Board and discussed with the Department at Accountability and Assurance meetings.

Governance arrangements are complex and onerous, with duplication between oversight groups

5.9   There are two main governance forums in relation to the Homelessness Strategy. The Homelessness Strategy Steering Group (HSSG) is chaired by the Department and includes representatives from the NIHE, the Department of Health (DoH), the Department of Education (DE), the Department of Justice (DoJ), the Public Health Agency (PHA), the Northern Ireland Federation of Housing Associations (NIFHA), and other non-statutory organisations from the homelessness sector. Through the HSSG, the Department is updated on the NIHE's actions in relation to homelessness and progress towards the implementation of actions. Its Terms of Reference state that the HSSG is intended 'to provide strategic leadership within a joined-up approach'. The HSSG also has responsibility for monitoring and reporting on the Interdepartmental Homelessness Action Plan (IDHAP) which is discussed later in this Part.

5.10   The Central Homelessness Forum (CHF) is chaired by the NIHE and includes membership from the community and voluntary sector, as well as representatives from some statutory agencies. It also includes membership from the Department. Its aim is to oversee the delivery of the Homelessness Strategy. The CHF also assists the NIHE in 'delivering the core aim of statutory and voluntary partnerships…'. There are significant overlaps in membership and attendance of the HSSG and the CHF. The NIHE told us that there was an intention for different members of organisations to attend each meeting.

5.11   The Department and the NIHE also meet as a Homelessness Strategy Delivery Group which is tasked with ensuring that the vision and objectives of the Strategy are delivered at local level and discussing the NIHE bi-monthly financial report at a lower level outside of the HSSG meeting.

5.12   In addition to the two main governance groups, there are a large number of forums and meetings involved in helping to address homelessness. These include:

- The Social Housing Development Programme Group, which sits within the NIHE to provide advice on new social housing starts.

- NIHE Place shaping teams.

- The Strategic Action Plan for Temporary Accommodation Implementation Steering Group.

- An Interdepartmental Task and Finish group tasked with upscaling the Housing First model of housing provision.

- Bi-lateral meetings held with Executive Departments in relation to the IDHAP and Homeless Scheme Assessment Committees.

    A review of the minutes of these meetings evidenced overlaps and duplication of both attendees and items discussed.   For example, an operational update on the Strategy and the IDHAP were provided by the NIHE at the HSSG, CHF and Homelessness Strategy Delivery Group. This appears to be an inefficient use of resources. Duplication across the meetings was also noted to us through the survey responses from the community and voluntary sector and through our engagement with that sector as part of fieldwork.

5.13   Despite the many oversight groups outlined above, we found there is no single forum with ownership for monitoring and reporting on the homelessness actions taken by the NIHE. While the HSSG provides a forum at which the NIHE provides an update on its actions, this is usually in the form of a written update which is only discussed upon request by a member, with little evidence of subsequent monitoring and reporting of actions. Furthermore, the update is output-focused with no consideration of how actions have contributed to improved outcomes in accordance with the Strategy. The NIHE said that there is a 'subtle but distinct difference included in the aim of the CHF and HSSG' whereby HSSG has more scrutiny focus.

Many of those involved in the oversight groups consider that governance arrangements could be improved

5.14   As part of the study, we issued a survey to all members of the HSSG asking for their experience of and opinions on operation of the group. Responses from the community and voluntary sector were consistent in their criticism and concerns around the oversight provided by the HSSG. Feedback included:

- HSSG participants are frequently not senior officials from the departments and statutory agencies, which limits their ability to commit to actions.

- The HSSG is not independently chaired.

- The approach is not properly outcomes focused, instead focusing on operational reporting.

- A lack of contribution and at times attendance by statutory representatives.

- Pressing matters are dealt with better outside of the group.

- A lack of focus on the IDHAP.

Feedback from NIAO stakeholder survey

Survey response, community and voluntary sector:

"HSSG does not provide oversight in the manner envisioned when the structures were established. Most of the statutory representatives do not contribute to the meeting which is largely a conversation between DfC and NIHE."

Survey response, statutory sector:

"Membership/Oversight should be extended to ensure all HSSG members are both a responsible lead and advocate for homelessness within their own Dept, organisation/agency, or across their sector…"

5.15   Respondents from the community and voluntary sector also considered there was
             duplication in terms of the work of the HSSG and that of the CHF, reporting that the
             distinction between the groups is not clear at times, there are agenda items that are
             repeated in both, and there are individuals who attend both meetings, which is also
             consistent with our evaluation. Several responses suggested that improved visibility of the
             remit of each group to the other would improve their operation.

Recommendation 8

**The NIHE and the Department should review and clarify the roles and responsibilities of
key homelessness governance and oversight groups. In the first instance, this review should
focus on the Homelessness Strategy Steering Group and the Central Homelessness Forum.
The review should identify opportunities to streamline the governance arrangements and
reduce duplication between groups.**

Operation of the IDHAP represents a missed opportunity for effective cross-departmental collaboration

5.16   The IDHAP was first published in 2017 and was developed to complement the
             Homelessness Strategy, addressing gaps in non-accommodation services. Four annual
             action plans have been produced in the last six years. The most recent IDHAP entitled
             Action Plan 4 was published in September 2023.

5.17   The IDHAP identifies five priority areas:

· Health and Wellbeing

· Education and Awareness raising

· Support for those leaving places of care

· Support for families (including those experiencing domestic violence)

· Employability, financial capability and access to benefits

             The 13 action points of the IDHAP are categorised under one of the priority areas.

5.18   Our review identified that of the 13 action points, all but two involve work which is already
             within the remit of that department. For example, action point one is entitled 'Mental
             Health Strategy'. This strategy is being progressed by DoH in line with commitments made
             as part of the New Decade, New Approach agreement. It is noted that the strategy itself
             does not refer to homelessness. Given the impact mental health has on homelessness
             presentations and allocations we would expect the NIHE and Department to be more
             actively involved in this action. Similarly, action point two involves the development and
             delivery of a new outcomes-focused strategic plan to replace the Alcohol and Drugs
             Services Commissioning Framework which is also being progressed by DoH.

5.19 The exceptions to the above were action points four and eight which were new initiatives with a clear link to homelessness:

- **Development and implementation of a delivery plan for Belfast Inclusion Hub**. The Inclusion Hub is a DoH initiative which provides a multi-disciplinary approach encompassing nursing, mental health and addictions support for people experiencing homelessness in the community. Our engagement with the sector indicated that this service is particularly needed due to the difficulties in accessing health care for patients with no fixed abode.

- **Improved accommodation support for those on bail or release from court.** Collaboration between the Department and DoJ to provide improved accommodation information and support for those on bail or released from court, and to provide appropriate accommodation for women exiting custody.

5.20 Of the 13 action points, only four (action points six, seven, eight and ten) involve true inter-departmental engagement outside of working with parent departments. For example, all of the actions under the 'Health and wellbeing' priority are assigned to DoH in isolation, and all actions under the 'Employability, financial capability and access to benefits' priority are assigned solely to the Department. Overall, most of the actions for delivering the IDHAP do not represent new initiatives or genuine cross-departmental collaboration.

5.21 The IDHAP states that monitoring will focus on evaluating its contribution to the overall objective of 'improving the lives and life chances of those who are homeless and those most at risk of homelessness'. However, we found that the quality and focus of reporting on the IDHAP outcomes has deteriorated as action plans have progressed. Our review of the Year 3 Report on the IDHAP found that it did not properly evaluate the extent to which action points contributed to the overall objectives nor the expected outcomes. This contrasted with the reports for Years 1 and 2 which outlined expected outcomes and progress made towards these at the year end. This is a more effective way of demonstrating the impact of specific action points and provides a more robust basis for developing subsequent action plans.

There are some pockets of effective cross-departmental collaboration in practice

5.22 During our interviews with community and voluntary sector representatives, many said that there was good evidence of collaborative working during the COVID-19 pandemic, particularly in the statutory sector. However, they reported that these organisations seem to have subsequently retreated and adopted entrenched positions. We recognise that resourcing constraints and a lack of multi-year budgets have a significant impact on organisations' ability to work together, however there are a number of specific projects where we found evidence of effective collaboration.

Complex Lives project

The **Complex Lives project** involves a whole system approach to homelessness bringing together a breadth of statutory, and voluntary and community sector agencies across housing, health, and criminal justice. It supports individuals who have fallen into a cycle of rough sleeping, addiction, poor mental/physical health and offending behavior. Complex Lives was designed as a collaboration model to enable a range of existing services (partner agencies) to join up their work more effectively.

The governance structure of the Complex Lives project comprises a weekly multi-disciplinary team (MDT) meeting, including representatives from the NIHE, PSNI, Probation Board, the Health sector and community and voluntary sector, with a wider group of agencies working together to agree a single support plan for especially complex and risky cases. In addition to this, there is a Steering Group consisting of senior managers and commissioners of services to join up the way money and relationships with service providers work, and a Senior Leadership Group of executive level leaders across agencies, chaired by the Belfast City Council Chief Executive. The Steering Group and Senior Leadership Group provide the ability to escalate system issues and rules that are getting in the way of joined up delivery quickly from the front line to high level decision makers.

Case study: Between Individual A's initial homeless presentation and referral to Complex Lives they experienced more than 15 placements with significant periods of rough sleeping and hospital admissions over a 2-year period.

At the time of initial MDT discussion, Individual A was experiencing a lengthy stay in hospital due to multiple health issues/health deterioration and continued to leave hospital grounds to use substances. There were now serious concerns that there would be a risk to their life should they return to rough sleeping.

Individual A was inducted onto the Substitute Prescribing Team (SPT) while in hospital and a Discharge Planning Meeting was arranged between Belfast Health and Social Care Trust, Extern, NIHE, Drug Outreach Team (DOT), Belfast Health Inclusion Hub, and DePaul to ensure appropriate support was in place.

Initially, Individual A was placed in non-standard accommodation with wraparound support until an appropriate bed became available. Even with additional support, they found it difficult to sustain placements in hostel and shared environments and so a single let was secured.

Individual A continued to receive coordinated support from the Health Hub, DOT and Probation Board as well as intensive floating support from DePaul and Extern. This supported them to sustain their stay in single let accommodation until they were rehoused and sustained this tenancy for 14 months.

Outcomes:

- Partners were able to coordinate support during hospital stays where there was serious concern regarding this person's health, and they did not return to sleeping rough on discharge.

- A tenancy was allocated, and despite some issues they were able to sustain the tenancy for 14 months.

- Ongoing engagement with SPT.

- They have not returned to prison during this time and are engaging well with Probation Board.

Housing Rights and Prisons partnership

Housing Rights is a registered charity which works across all three of Northern Ireland's prisons to provide independent housing advice to prisoners and their families. There are three distinct elements of this advice:

- A Peer Advice Service: teams of prisoners accredited in housing advice, advising their fellow prisoners.

- Specialist Adviser Teams: provide an advocacy and representation service, challenging adverse housing decisions to achieves best outcomes.

- Beyond the Gate Service: Post-release advocacy and support for those with the most complex of needs.

To facilitate this partnership working, a Prisons Protocol is in place which provides the framework for the management of the accommodation, and related support needs, of people in custody in NI, from committal until release. The formal signatories to that Protocol are the NIHE, Northern Ireland Prison Service, Probation Board Northern Ireland and Housing Rights.

Recommendation 9

People experiencing homelessness interact with a range of different services. We recommend that the Department and the NIHE should work with other departments represented on the Homelessness Strategy Steering Group to identify opportunities for meaningful and significant joint working on homelessness services and to target resources collaboratively. This should include engaging with the community and voluntary sector to review projects which are working effectively, identify best practice and lessons learned.

The approach to governance is not sufficiently outcomes focused

5.23   Consideration of the Strategy, the IDHAP, annual action plans and minutes of the various meetings suggest that the overall approach to monitoring homelessness services lacks a focus on how actions have contributed to measurable homelessness outcomes for service users. By way of example, action 44 of the Year 3 Action Plan for the Strategy is: 'We will support The Executive Office in implementing the Period Product (Free Provision) NI Act 2022 and we will seek to promote and raise awareness of the support available' and Action 45 is: 'We will work with the Housing Community Network, Race Relations Officer, and other key partners to promote community integration'. It is not clear how such actions are enabling in terms of improved outcomes. A lack of focus on outcomes was also reported in the survey responses, one of which stated that 'outcomes are not discussed [at HSSG] as it focuses on inputs rather than outcomes'. Further, one response reported a lack of awareness of any assessment at HSSG of outcomes data related to the Strategy and outlined that the intended outcomes do not shape the discussion or agenda.

5.24   The links between individual actions in the IDHAP and their impact on dealing with homelessness are similarly unclear in some cases. By example, action five relates to maintaining a previous action for the Department of Education and the Council for the Curriculum, Examinations and Assessment (CCEA) to produce teaching resources on its website concerning homelessness, and for analysis on website diagnostics of demand on the resources. Further, despite prevention being at the centre of the Homelessness Strategy, the IDHAP only makes specific reference to homelessness prevention and early intervention in relation to one of the action points: action point six which focuses on those leaving custody. This suggests that the IDHAP may not be properly aligned with the Strategy in the way in which it was intended.

5.25   The Department told us that it is working with a partner organisation to develop indicators to reflect the desired outcomes and that activities would be aligned to these indicators. While this is welcome, it is troubling that it is only happening two years into the current homelessness strategy and there has been insufficient focus on outcomes reporting and monitoring throughout the governance structures and various action plans for delivering homelessness services.

Recommendation 10

The NIHE and the Department should review all strategies and action plans which have a direct link to the Homelessness Strategy and ensure that actions are properly evaluated, including the degree to which they contribute to outcomes. Annual reporting should include assessment of measurable long-term progress and identification of corrective actions and improvements required in subsequent years.

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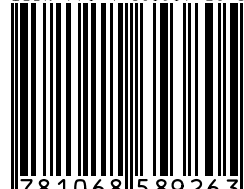| Title	Date Published
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