



Response to Consultation

Date: 07 October 2011
Consultation: Housing Benefit Reform – Supported Housing

Background

The Northern Ireland Federation of Housing Associations (NIFHA) represents registered and non-registered housing associations in Northern Ireland. Collectively, our members provide around 36,000 good quality, affordable homes for renting or equity sharing. Further information is available at www.nifha.org. A significant number of our members provide supported housing and housing related services either directly or indirectly through joint management agents, which enable the vulnerable, older people and people with disabilities in our society to live independently within their communities.

Introduction

Supported housing schemes provide and encourage housing and support which is specific to the holistic development of each individual resident and facilitates their interaction within their communities. This assists the Department for Social Development, in Northern Ireland, fulfil its objective “to tackle disadvantage and build communities” through giving their support to the provision of community based supported housing schemes with a range of facilities which are appropriate to the needs of each of their individual residents.

However NIFHA considers that the consultation should not apply to Northern Ireland as the proposals within the consultation paper do not reflect the working systems and the process for Housing Benefit currently existing within Northern Ireland. The way in which Housing Benefit assists those living in supported housing within the social and voluntary sector with their rent is different in Northern Ireland to the rest of Great Britain (GB). This is a fundamental principle which needs to be borne in mind when considering how suitable these proposals are in relation to the housing systems within Northern Ireland. This leads NIFHA to question the relevance of the DWP consultation to Northern Ireland and we propose that, if it is necessary, a further consultation be developed and issued which specifically relates to the existing operational systems.

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



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General Comments

NIFHA welcomes the opportunity to respond to this important consultation document. As the representative body for the providers of housing related support, we consider that the proposals set out in this consultation to change the way in which Housing Benefit is paid to those living in supported housing is an important consideration for our members and the people they support. The voluntary housing movement acknowledges that the provision of good quality, affordable supported housing is an important aspect of our society as it enables vulnerable people to live independently and with dignity.

Services provided within supported housing are normally developed as a result of specific individual and / or group needs which means they cannot be easily categorised and generalised. There therefore is a high level of complexity surrounding supported housing provision which means that there is difficulty in identifying standardised services. This means that the calculations for supported housing are more difficult to apply as a simplified model and whilst we understand and appreciate the desire for simplification we have concerns that in doing so systems may be put in place which mean that services are unable to respond to the specific needs of particular individuals or client groups.

Research such as the Cap Gemini report into the cost benefit of the Supporting People Programme has identified that there is a return on investment of £3.41 for every £1.60 spent which is evidenced through reduced pressure and demands on statutory bodies. This in turn enables vulnerable people to live independently, with dignity within their communities and in many cases they make a positive contribution to their communities which may bring added value with respect to community benefit.

The Northern Ireland Housing Executive not local authorities are responsible for the payment of Housing Benefit for supported housing within Northern Ireland therefore any references within the document to local authorities will not apply or read across on a like for like basis. The centralised Housing Benefit system, within Northern Ireland, is known to work to high quality standards and benefit processing times are significantly less than those in the rest of the United Kingdom.

Rent levels for Supported Housing in Northern Ireland are less than those in the rest of the United Kingdom and again the system for determining the amount of Housing Benefits contribution to the rent in Supported Housing is different to that



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within the rest of the United Kingdom. The current system is considered to be efficient and effective in meeting the needs of the people, within Northern Ireland, who are vulnerable and / or have a disability.

There are a number of other important differences between the way the Housing Benefit system operates in England, Scotland and Wales and Northern Ireland which will be discussed further in our specific comments. However, NIFHA considers that the two main differences, as illustrated above, are significant and that they provide an indication that the system currently operating in Northern Ireland is working well and is delivering a cost effective and efficient level of service to a high quality standard.

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

Universal Credit, which is to be introduced from 2013, is viewed as being the driver behind the reform of the Housing Benefit system as applicable to supported housing. The consultation document suggests that the ethos behind Universal Credit is to remove the complexities from the current benefit system. The Housing Benefit system in Northern Ireland has already undergone significant reviews to its processes with a view to streamlining the current system, which has led to the delivery of a more efficient cost effective service. This perhaps should be used as a model for other areas within the United Kingdom.

NIFHA has concerns that a one size fits all approach to housing benefit & supported housing will be imposed in Northern Ireland and that this will be to the detriment of very vulnerable groups of people who depend on this very necessary benefit to enable them to live independently within their communities.

Specific Comments

Conventional Supported Housing

Question 1 What types of supported housing are available and how do you suggest they should be identified and grouped?



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We believe that there are a wide range of different types of supported housing accommodation which have been developed to meet the needs of people with a range of specific support needs. Whilst we would not wish to “pigeon hole” people with diverse needs we have identified in broad theme terms that there are four types of supported housing available and they should be grouped as:

- Sheltered Accommodation
- Hostel Accommodation
- Foyer Accommodation
- Supported Housing

Question 2 Should there be different geographical rates for each type of mainstream supported housing, such as hostels, sheltered housing or refuges or should a single rate be applied?

We believe that the rate should depend on the type of accommodation provided, together with the facilities available. NIFHA considers that there is no real relationship between LHA and the cost of developing, maintaining and providing a range of housing services within supported housing, so to use LHA as a baseline for the amount of Housing Benefit to be paid for supported housing is inappropriate.

Question 3 What types of additional activities or resources are typical of supported housing and how should these be quantified into a weekly amount per unit?

There are normally greater Housing Management costs, wear and tear on furniture, repairs and maintenance costs, enhanced staffing levels with associated training needs and in many cases increased security costs. Increased costs associated with the provision of supported housing should be assessed and calculated for each individual unit of housing. It would be difficult to find a representative average cost per unit, to use as a baseline amount, as there may be wide variations depending on the needs of individual residents and those needs will change as each tenancy changes.

Question 4 Should an amount for the additional help be worked out using a flat rate addition representing typical additional costs or should a different method be used? Please tell us what you think are the advantages of your preferred option.



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NIFHA would not support this approach, as stated previously a flat rate addition, probably based on an average, would be impractical as each resident normally has individual needs which costs will accrue to. We currently have a system in Northern Ireland where Housing Benefit Policy Unit examines the costs for each scheme and makes an allowance based on their knowledge and expertise regarding supported housing needs in Northern Ireland. Our view is that this system is working well and should remain in place.

Specialist Individual Housing

Question 5 What types of supported housing would fall into this group and how do you suggest they should be identified?

The same four groups as indicated previously could be classed as specialist individual housing, this depends really on how DWP define this type of housing for example is it defined according to the needs of the people living in the accommodation or according to the construction type of the dwellings. We would suggest that it should be defined according to the needs of the people living in the accommodation.

Question 6 What types of higher housing costs are typical of this type of supported housing that are over and above adaptations or specialist equipment, which have funding sources elsewhere and how should these be quantified?

The types of higher housing costs would be similar to those required for conventional supported housing but normally will be higher because of a more intensive level of support. However, it is important to recognise that no one model will fit all of the accommodation types as the housing costs will be driven by the needs and dependency levels of each individual resident.

Question 7 Would the additional help for those with very individual housing needs be better met from separate funding administered by local authorities, expert in providing housing and / or care in the community?

This already happens in Northern Ireland although the funding is not administered by local authorities. The funding normally comes from a number of sources each with their respective areas of responsibility within Northern Ireland.

Question 8 Which tier of local government should have responsibility for deciding how extra help should be allocated? And, which department within a



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local authority do you think is best placed to manage the allocation of this funding?

The arrangements currently existing within Northern Ireland should remain, local authorities do not manage this funding in Northern Ireland.

Question 9 Should a different method be used? If so please explain.

The current arrangements in Northern Ireland are considered to be fair and work well. There is a Commissioning Body which meets and acts as a platform for bringing health and housing issues together, to find cost effective solutions which are beneficial for vulnerable people requiring various levels of support in Northern Ireland.

Question 10 How can funding be made sufficiently flexible to changing caseloads and demands without being unlimited or increasing unit costs compared to the existing system?

Social need should be the main driver for the funding levels and whilst we recognise that there is a limit to the funding levels identified we suggest that they should be sufficiently flexible to enable the provision of this important service.

Wider Reform

Question 11 Is there a case for considering housing costs more fundamentally within a wider context by having the additional costs associated with supported housing taken out of Housing Benefit altogether and administered locally in the same way as *Personal Budgets*?

This would be a very complex system to manage. We query if the amount of money paid to individuals would vary on a scheme by scheme basis? We also have concerns regarding who would be responsible for administering the new system. Thought needs to be given also about who would be included within the new system and if people could choose to opt out of having the money paid directly to them as individuals and instead have it paid directly to the service providers?

Question 12 Would this sort of approach only be appropriate for those that live in more specialised or adapted properties?



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One general model or approach would not be suited for people included under the framework for supported housing. Different client groups and indeed individual clients normally bring a number of different challenges which have to be recognised and managed appropriately.

Supported Housing of Registered Providers and Social Landlords

Question 13 Should the supported housing of registered providers be treated in the same way, for Housing Benefit purposes, as their mainstream housing?

Housing Benefit for supported housing requires a different type of assessment process than for mainstream housing. Northern Ireland follows a different assessment process than that currently existing in the rest of the United Kingdom which is seen to be efficient, fair and relevant to Northern Ireland.

Question 14 What do you think of the proposed categorisation of supported housing; is there a sound basis for treating these three types of supported housing differently? (registered providers, those who can be identified by their accommodation type and those with more intense, individual needs)

Supported housing should be determined by the needs of the individuals who are availing of the supported housing services. If a person with particular needs is placed in one type of accommodation, then that accommodation must be suited to their needs and the amount of housing benefit applicable should be assessed accordingly. It must be stressed that Housing Benefit, in supported housing, must be assessed in such a way to ensure that each individuals appropriate housing costs are met.

Question 15 Is the process of rent-officer referral sufficient to ensure that only 'reasonable' supported accommodation costs are met in the registered provider sector? Are there ways in which the rent referral process could be improved?

We have a different process in Northern Ireland and reference to the rent officer is not applicable. The system currently existing in Northern Ireland is considered to be efficient, fair and relevant to Northern Ireland.



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Transitional Arrangements

Question 16 How do you think the new rules should be introduced?

There are different systems in place in Northern Ireland than those currently in existence in the rest of the United Kingdom which we consider work well and are appropriate for Northern Ireland. NIFHA considers that the consultation does not apply to Northern Ireland and that the proposals within the consultation paper do not reflect the working systems and the Housing Benefit context currently existing within Northern Ireland. The way in which Housing Benefit assists those living in supported housing within the social and voluntary sector with their rent is different in Northern Ireland to the rest of Great Britain (GB). This is a fundamental principle to bear in mind when considering how suitable these proposals are in relation to the housing systems within Northern Ireland. This leads NIFHA to question how relevant the DWP consultation is to Northern Ireland and we propose that, if it is necessary, a consultation be developed and issued which specifically reflects the current operational systems.

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I hope you find these comments useful please contact the undersigned if you require any further information or clarification.

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