

Northern Ireland Housing Executive
No Home from Home: Draft Action Plan

Key

ST – short term 3 to 6 months

MT – medium term 6 to 12 months

LT – long term 12 months and beyond

NIHE – Northern Ireland Housing Executive

SSA – Social Security Agency

NIHRC – Northern Ireland Human rights Commission

DHSSPS – Department of Health, Social Services and Public Safety

Recommendation	Timeframe	Action /Responsible Persons	Status
<p>1. Recommendation 13 All relevant staff across the three agencies should receive at least a basic level of human rights training. This training should take account of government’s obligations under domestic and international human rights instruments. In particular, human rights training should cover the applicability of human rights standards to homeless non-UK nationals who are at risk of destitution</p>	<p>a) Complete b) Complete c) LT</p>	<p>a) Development of an ‘Equality briefing’ - NIHRC Investigators to meet with NIHE Equality Unit to discuss how best to take forward the briefing document</p> <p>b) Development of a module and / or add-on to current training - NIHRC Investigators to meet with NIHE Equality Unit to discuss how best to take this forward</p> <p>c) Roll-out of training – NIHE Equality Unit</p>	<p>a) Done – NIHE commissioned the development of two briefing documents. The first for all staff covering the <i>Human Rights Act 1998</i>; the second for senior managers on human rights screening of policies – this will include reference to International Human Rights Treaties</p> <p>b) Done – enhanced human rights module has been developed.</p> <p>c) Ongoing</p>
<p>2. Recommendation 14 All relevant government agency staff should receive anti-racism training that is evaluated and updated, and compliant with the Macpherson</p>	<p>a) Complete b) Complete</p>	<p>a) Update on Macpherson definition to all staff</p> <p>b) Anti-racism training provided to all staff to be reinforced – NIHE Policy Unit to discuss with Community Cohesion</p>	<p>a) Done – completed and issued to all staff by NIHE Policy Unit & Equality Unit</p> <p>b) Done – a new training module has been developed with the</p>

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report		Unit on how anti-racism training can be reinforced	Chartered Institute of Housing; training will be reissued & reinforced.
<p>3. Recommendation 15 All government agency staff, including Trust staff, should be familiar with when, and how, to refer a homeless non-UK national, who is excluded from accessing homelessness assistance and welfare benefits, to the relevant Health and Social Care Trust for an assessment of her or his entitlement to assistance.</p>	<p>a) MT b) LT</p>	<p>a) Joint meeting with NIHE; Trusts; SSA to discuss referral arrangements in more detail e.g. points of contact; the response from the Trust once they receive a referral – NIHRC Investigators to meet with DHSSPS and Trusts Dec 2009; NIHRC Investigators to organise a joint meeting with all three government agencies to discuss how they can bring forward this recommendation – Summer 2010</p> <p>b) Memo to staff – Following the meetings with the DHSSPS, the Trusts and the joint meetings with all three government agencies, NIHE policy unit will draw up and disseminate a memo for staff regarding provisions within the Homeless guidance that advise staff to contact social services where the applicant has dependent children and / or is vulnerable (NB: before this can be done, NIHE requires precise referral routes for each of the categories of vulnerability)</p>	<p>a) Ongoing (NIHRC continuing to action)</p> <p>b) Ongoing – NIHE will develop a ‘HRAN’ (guide) following joint meetings and clarification of referral routes and appropriate teams</p>
<p>4. Recommendation 16 Each of the three government agencies should use appropriately experienced and accredited interpreters. Specially trained interpreters</p>	<p>a) Complete b) Complete</p>	<p>a) To reinforce through training</p> <p>b) Development of a memo that can be sent to staff reminding them of NIHE policy on interpreting - NIHE Policy Unit to meet with Equality Unit to discuss</p>	<p>a) Done (functional trainers are reinforcing the message to staff on an ongoing basis)</p> <p>b) Done – it was decided that NIHE Equality Unit will</p>

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<p>should be used in difficult cases, for instance, where the applicant has complex needs. Unless it is an emergency, face-to-face interpreting services should be offered. Government agencies should end the practice of using children to interpret. In addition, the practice of asking friends and family members to interpret without first offering an interpreting service should end. Government agencies should make time allowances where there are language barriers; in particular, consideration should be given to providing extra time for meetings and/or interviews.</p>		<p>development and dissemination of memo</p>	<p>reissue the existing guidance / bulletin on interpreting</p>
<p>5. Recommendation 17 The government agencies should include within each letter a standard statement, translated into several languages, explaining the purposes and urgency of the letter and how to contact the government agency for further information, explanation or a review of any decisions. In addition, government agencies should assess the extent to which certain letters, or parts thereof, can be standardised and therefore translated in advance.</p>	<p>a) Compete b) ST c) LT</p>	<p>a) Standardised statement translated into several languages e.g. ‘if you have difficulty understanding any aspect of this letter please contact...’</p> <p>b) Consider a standardised statement for letters that require a time bound response e.g. refusal letters where there may be a timeframe for seeking review / appeal - NIHE Policy Unit to consider how far it is feasible to take this forward including whether or not there is a need for input at a corporate level and from other internal departments such as the Information Department and the Equality Unit.</p>	<p>a) Currently under consideration</p> <p>b) Ongoing – The Community Cohesion Unit and Equality Unit are looking at ways to target need for language services and are actively promoting services to ethnic minorities, and for those who are visually or hearing impaired.</p> <p>c) Ongoing - The Community Cohesion Unit and Equality Unit are looking at ways to target need for language services and are actively</p>

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		<p>c) Consider if there are letters that can be standardised and translated - NIHE Policy Unit to consider how far it is feasible to take this forward including whether or not there is a need for input at a corporate level and from other internal departments such as the Information Department and the Equality Unit</p>	<p>promoting services to ethnic minorities, and for those who are visually or hearing impaired.</p>
<p>6. Recommendation 18 The government agencies should develop, agree and effectively disseminate reliable interagency protocols. The protocols should identify any potential gaps in service provision and ensure that, in all circumstances, there is a referral route so that a homeless non-UK national, who is excluded from homelessness assistance and welfare benefits, can be assessed to establish if they are entitled to any other form of support.</p> <p>Appropriate and formalised, referral arrangements should be included. In addition, the interagency protocols should outline the approach to be adopted for daytime and 'after hours' services. Following on from this, the government</p>	<p>a) ST b) LT</p>	<p>a) Joint meeting with NIHE; Trusts; SSA to discuss referral arrangements in more detail e.g. points of contact; the response from the Trust once they receive a referral - Investigators to meet with DHSSPS and Trusts Dec 2009; Investigators to organise a joint meeting with all three government agencies to discuss how they can bring forward this recommendation Summer 2010</p> <p>b) Development of protocol</p>	<p>a) Ongoing – NIHRC continuing to action</p> <p>b) Ongoing – to follow on from joint meeting</p>

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<p>agencies should produce an interagency guide for their staff, outlining options for assistance and referrals for homeless non-UK nationals.</p>			
<p>7. Recommendation 19 In responding to homeless non-UK nationals, government agencies should continue to engage with the voluntary sector. Where there is a statutory duty to assist, government agencies should not signpost to voluntary organisations for accommodation services without ensuring that the organisation is provided with appropriate financial support.</p>	<p>a) ST b) ST</p>	<p>a) Guidance note to be issued to staff on voluntary sector contacts – NIHE Policy Unit to develop and issue guidance note</p> <p>b) To ensure that staff are aware of the remit of the different voluntary organisations, the voluntary sector directory will be updated and circulated to staff - NIHE Policy Unit to liaise with Community Cohesion Unit on updating and disseminating the voluntary sector directory</p>	<p>a) Ongoing – NIHE will issue a guidance note outlining the importance of signposting to voluntary sector organisations. The note will refer to the updated NIHE voluntary sector directory which contains information on the remit of the various voluntary organisations</p> <p>b) Ongoing – the directory is being updated on the NIHE Portal. The Community Cohesion Unit will ensure that each District is aware of it.</p>
<p>8. Recommendation 20 Inquiries in relation to eligibility ought to be evidenced in writing in the specific section of the homelessness application form. Findings relating to 'priority need' should always be recorded even if it is determined that the applicant is ineligible for homelessness assistance.</p>	<p>a) Complete and ongoing</p>	<p>a) Importance of recording information to justify how decisions are made to be emphasised in training for decision makers and senior housing officers - Importance of recording has already been incorporated into NIHE training for staff</p>	<p>a) Incorporation in training – Done; roll-out of training – ongoing</p> <p>In addition:</p> <ul style="list-style-type: none"> • A further advice note will be issued to staff to reinforce the recording of investigations and decision-making on the visit/assessment form and on the file. • A sample of eligible and ineligible cases will be checked

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			<p>in one district per area.</p> <ul style="list-style-type: none"> • Checks on recording investigations and decisions on file will be built into the appeals and audit processes.
<p>9. Recommendation 21 The NIHE should develop human rights compliant guidance, outlining the circumstances in which having accommodation abroad can result in a finding that homelessness has been intentional.</p>	<p>a) ST b) MT</p>	<p>a) Consultation with internal legal team may be required on current case law in this area - NIHE Policy Unit to consult with internal legal team on intentionality and persons with accommodation abroad;</p> <p>b) Development of guidance to follow in light of consultation with legal team - NIHE Policy Unit to consider development of guidance following consultation with legal team; NIHE Policy Unit will liaise with investigators on development of guidance.</p>	<p>a) Ongoing – the Legal Team are considering this matter and will meet with the Policy Unit to advise on any necessary amendments to the guidance.</p> <p>b) Ongoing (as above)</p>
<p>10. Recommendation 39 The NIHE should ensure that individuals presenting as homeless, with serious physical ill-health, can be considered for ‘priority need’ (within the meaning of the <i>Housing (Northern Ireland) Order 1988</i>).</p>	<p>a) ST b) ST</p>	<p>a) NIHE to consult with internal legal team to see if there is anything further on the meaning of ‘serious physical ill-health’ that might be of help to staff – NIHE Policy Unit</p> <p>b) The importance of recording decisions on priority need for those presenting with physical ill-health will be re-emphasised to staff - NIHE Policy Unit to take forward [for example, this will be reinforced in a Homelessness Decision Making and Best Practice course delivered to senior NIHE staff, roll-out of</p>	<p>a) Done – there have been no further developments in case law. There is no blanket definition; it depends on the circumstances of the individual and whether physical ill health impacts on their ability to live in their home.</p> <p>b) Ongoing – this has been emphasised in recent training.</p>

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		which is due to be completed by the end of November 2009; Housing and Regeneration Advice Notes will be issued as required; the Homelessness Guidance Manual and Homelessness training modules will be updated as necessary]	
<p>11. Recommendation 40 The NIHE should ensure that staff can identify alcohol and substance misuse as a potential indicator of mental ill-health or as an 'other special reason' for 'priority need'.</p>	a) ST	a) Consult internal legal team to establish the scope of "other special reason" within the Housing (NI) Order 1988 - NIHE Policy Unit to consult with internal legal team (to look at how far this can encompass those presenting with alcohol or substance misuse and 'rough sleepers')	a) Ongoing – each case is different and the assessment is based on the individual circumstances and whether the applicant is vulnerable. There is no blanket policy. Alcoholism in itself can be an indication of vulnerability. A guidance note will be issued to staff to reinforce that staff should give due consideration to all circumstances.
<p>12. Recommendation 44 The NIHE should develop specific training for housing officers, outlining how to respond to homelessness applications made on grounds of racial intimidation. For all district offices, training should ensure that there is a consistent approach by staff when determining whether an attack has taken place and how to assess whether an incident should be categorised as intimidation as opposed to neighbourhood harassment. In</p>	a) ST b) Complete c) ST	<p>a) Training to be taken forward by NIHE Equality Unit - Commission investigators to meet with NIHE Equality Unit to discuss training</p> <p>b) Macpherson compliance: staff to be issued with an update briefing on the Macpherson definition – Update briefing on Macpherson – this has been completed and issued to staff by NIHE Policy Unit and Equality Unit</p> <p>c) Recording: staff will be reminded of the importance of recording how decisions on 'intimidation' are made – [for example, this will be reinforced in</p>	<p>a) Ongoing – representatives from the Equality Unit, Community Cohesion Unit and Housing and Homelessness Policy Unit will meet to discuss a training programme.</p> <p>b) Done</p> <p>c) Ongoing</p>

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<p>addition, the training should be Macpherson compliant so that all staff are aware of the Macpherson definition of a racial incident, which is any incident perceived by the victim, or any other person, as racist.</p>		<p>a Homelessness Decision Making and Best Practice course delivered to senior NIHE staff, roll-out of which is due to be completed by the end of November 2009; Housing and Regeneration Advice Notes will be issued as required; the Homelessness Guidance Manual and Homelessness training modules will be updated as necessary]</p>	
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