

Social Security Agency *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

SSA – Social Security Agency

NIHE – Northern Ireland Housing Executive

NIHRC – Northern Ireland Human Rights Commission

DHSSPS – Department of Health, Social Services and Public Safety

DSD – Department of Social Development

DWP – Department of Work and Pensions

Recommendation	Term	Action /Key Person/Timeframe	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</p>	<p>ST commencement MT/LT roll out</p>	<ul style="list-style-type: none"> ▪ Human rights training for all staff from AA, AO to SGB. ▪ Briefing sent on 16 October regarding availability of training. ▪ Human rights training is mandatory for all new starts and voluntary as a refresher for all other staff. Since April 2009, 1,139 SSA staff have received training. ▪ Training delivered includes: overview of the European Convention on Human Rights (ECHR), differentiating between absolute and qualified rights, principle of proportionality, non-discrimination, the Human Rights Act and its impact on work off SSA staff, complaints, human rights compliant conduct, 	<p>Ongoing</p>

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homeless non-UK nationals who are at risk of destitution.		sources of guidance and information.	
<p>2. Recommendation 14 All relevant government agency staff should receive anti-racism training that is evaluated and updated, and compliant with the Macpherson report.</p>	ST commencement MT/LT roll out	<ul style="list-style-type: none"> ▪ NICS-wide training is delivered to all SSA on an ongoing basis within the general diversity programme of training. Refresher training is provided at least every three years. ▪ Training programme will be made available to investigators. 	Ongoing
<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>	ST	<ul style="list-style-type: none"> ▪ Joint meeting with NIHE, Trusts and SSA to discuss referral arrangement in more detail, e.g. points of contact; the response from the Trust once they receive a referral. Guidance is to be prepared following the above meeting. ▪ SSA has developed a flashcard showing how to refer an applicant on to the NIHE or the Health & Social Care Trust. The flashcard also highlights when staff should make a referral to the Social Fund. Investigators were provided with a draft to input and have provided feedback. Once the flashcard is finalised, the SSA will prepare a guidance note for all staff referring to the flashcard and explaining that it has been developed in response to <i>No Home from Home</i> ▪ There is existing SSA guidance providing for joint meetings between SSA, and NIHE. This allows for meetings on a 6 monthly basis. The guidance will be reissued to all District Managers referring to <i>No Home from Home</i> and emphasising the need for a meeting to discuss, among other matters, non-UK 	<p>Ongoing SSA awaiting outcome of NIHRC meeting with Trusts and DHSSPS</p> <p>Completed</p> <p>Nov 2010</p>

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<p>4. Recommendation 16 Each of the three government agencies should use appropriately experienced and accredited interpreters. Specially trained interpreters 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.</p> <p>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</p>	<p>ST</p>	<ul style="list-style-type: none"> ▪ A memo will be issued by the SSA to all staff restating the protocol regarding language services. Investigators will be provided with draft to input. 	<p>By end December 2009 Complete</p>

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interviews.			
<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>	ST - commence engagement, and MT/LT - implementation	<ul style="list-style-type: none"> ▪ This is not a recommendation which the SSA has the authority to take forward as the SSA is dependent on a GB-wide IT system which generates and issues all letters. Investigators will therefore follow up with the Department of Work and Pensions. 	Letter sent from NIHRC Chief Commissioner to Chief Exec of Jobcentre Plus in February 2010. Investigators are following this up.
<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</p>	a) Joint meeting with NIHE; Trusts; SSA to discuss referral arrangement in more detail, e.g. points of contact; the response from the Trust once it receives a referral – ST	<ul style="list-style-type: none"> ▪ Investigators to meet with DHSSPS and Trusts in December 2009. ▪ Investigators to organise a joint meeting with all three government agencies to discuss how they can bring forward this recommendation – Jan 2010 	<p>Investigators met with DHSSPS in December 2009, Trust representatives in February 2010 and Directors of Social Work in April 2010. Follow up ongoing.</p> <p>The DHSSPS/ Trust action plan must first be agreed before an</p>

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<p>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.</p> <p>Following on from this, the government agencies should produce an interagency guide for their staff, outlining options for assistance and referrals for homeless non-UK nationals.</p>	<p>b) Development of protocol - MT</p>		<p>interagency meeting takes place. Aiming for meeting to take place in autumn 2010.</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</p>	<p>ST</p>	<ul style="list-style-type: none"> ▪ The SSA will prepare guidance which refers to <i>No Home from Home</i> for all frontline staff which will be forwarded to investigators for input and agreement on content. ▪ In addition, Grade 6 meets with the Advice Service Alliance at three to six monthly meetings. The recommendation can also be raised there. 	<p>Ongoing</p> <p>Ongoing</p>

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accommodation services without ensuring that the organisation is provided with appropriate financial support.			
<p>8. Recommendation 26 All SSA staff should be issued with, and regularly trained, on an easy to read basic guide to the benefit legislation as it applies to non-UK national applicants. In particular, SSA staff should receive guidance on referral of applicants to the Social Fund and recording thereof.</p>	ST	<ul style="list-style-type: none"> ▪ This item will be referred to DSD which is responsible for the delivery of training and production of instructions for staff in relation to decision-making. ▪ The SSA will consider the need for additional guidance to staff. Investigators will be provided with a draft to input. ▪ A Flashcard has been developed which among other things highlights when staff should refer to the Social Fund. 	<p>Ongoing</p> <p>Ongoing</p> <p>Completed</p>
<p>9. Recommendation 27 Pending review of the habitual residence test, in order to be able to demonstrate that the test has been applied consistently, SSA staff responsible for evidence gathering should be provided with a standard form to ensure that, in all cases, the same information is requested. All case files should contain an accurate record of how the decision on the habitual residence test was arrived at.</p>	ST	<ul style="list-style-type: none"> ▪ SSA will consider the need for additional guidance to staff. ▪ The guidance on the HRT will be reinforced to Decision Makers and Claims Assessors to ensure full and proper completion of the HR1 & 2 form by the Claims Assessor and that the reasons for the decision are fully explained in the case file by the Decision Maker ▪ A flash card has been developed outlining when and how to apply the Habitual Residence Test. It also highlights that staff should record comprehensive details when completing the Habitual Residence Test forms. ▪ An update on Customer 1st will be provided by Network Support Branch (NSB) as the pilot 	<p>Ongoing</p> <p>Ongoing</p> <p>Completed</p> <p>Verbal update provided to investigators at</p>

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		<p>progresses. Customer 1st is a reorganisation of the way frontline services are delivered; it is being taken forward on a pilot basis in one district. It is designed to reorganise services so that delivery is more viable.</p>	<p>meeting of 16 June – newsletter sent to investigators for information.</p>
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