



Consultation Response:

NIHE Consultation on “Ending Homelessness Together” Homelessness Strategy for NI 2017 - 22

January 2017

About NISMP

The Northern Ireland Strategic Migration Partnership (NISMP) is a multi-agency, cross-party and cross-sector partnership. NISMP aims to work across the spheres of government and with other key stakeholders to ensure that Northern Ireland is a welcoming place for new migrants. It seeks to support the retention and integration of people in a way that helps meet skills and labour needs to support future economic growth and social cohesion. It provides a regional advisory, developmental and consultative function, enabling government at all levels, our partners and stakeholders to develop an appropriate Northern Ireland migration policy structure. This will help ensure that Northern Ireland's needs and concerns in respect of immigration are recognised within the constraints of UK wide strategy.

This response has been approved by representatives on the Partnership. However this does not necessarily reflect the views of Partner Organisations, some of whom have not been canvassed.

Introduction

NISMP welcomes the opportunity to respond to this consultation on the Homelessness Strategy for Northern Ireland 2017-22

In this response we have limited our remarks to homelessness as it affects individuals and families who have no recourse to public funds (NRPF), and in particular asylum seekers.

Comments

1. We welcome the clear commitment of the strategy to address homelessness among those who do not qualify as full duty applicants, and to ensure 'the provision of appropriate support services to assist all homeless households to find and sustain long term housing solutions'. We recognise the challenges that are faced by social landlords with regard to providing these support services to clients who have no recourse to public funds (NRPF), due to their restricted eligibility to public services and benefits.
2. We support the emphasis within the strategy on data gathering to provide an evidence base on the extent of the issue of NRPF clients and using this to inform policy decisions. Given the role of NIHE in the provision of accommodation to asylum seekers through the COMPASS contract, we believe that data collection should be a straightforward exercise in relation to asylum seekers at risk of destitution.
3. The section of the strategy (currently section 4.3.4) which focuses on the detail of NRPF must be updated to include provisions from the Immigration Acts of 2014 and 2016 which are due to be rolled out in Northern Ireland later this year. These provisions include changes to support for refused asylum seekers and immigration checks by landlords on tenants.

4. The changes in support for refused asylum seekers will affect mainly families who, because of the duty of care that the State bears for children, are currently able to access financial support from the Home Office. By ceasing to automatically grant this support, the duty of care for these families will be transferred in Northern Ireland to Health and Social Care Trusts. In anticipation of this transfer of duty of care, the Act has enabled regulations which place restrictions on refused asylum seekers' entitlements to support under the Children Act. These latter regulations are currently only in force in England but there is provision within the Act for it to be extended throughout the UK.

In our [response to the Home Office consultation on reforming support for refused asylum seekers](#) we recommend that an independent review of asylum support rates on safeguarding and promoting the welfare of children in the UK is required before any further reduction in payments, or change in mode of payment is contemplated. From the same consultation response we state that support organisations in Northern Ireland estimate that there are over 100 families who have been refused asylum and whose support under these proposals could potentially transfer to the HSCTs or who may find themselves in a position where no support is available.

5. The strategy must also recognise the impact that the 'right to rent' provisions contained within both the 2014 and 2016 Immigration Acts will have on the number of households at risk of homelessness. These provisions oblige landlords to carry out checks on prospective and current tenants' immigration status. Landlords who are found renting to someone who is disqualified as a result of immigration status will be liable to a fine, imprisonment, or both. As highlighted by the [Residential Landlords Association](#), these provisions will affect not only undocumented migrants but also those who are less well-off, thus increasing the pool of tenants at risk of destitution and homelessness.
6. We believe that the model of Housing Solutions and Support Teams as explained in the strategy document is a useful one and would recommend that a team is established with a particular focus on NRPF clients.