

Housing Rights

Policy Consultation response
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Response to the Housing Supply Strategy call for evidence

July 2021

1.0 INTRODUCTION

Housing Rights is Northern Ireland's leading independent provider of specialist housing advice. For over 50 years we have been helping people to find and keep a home. We believe that prevention is better than the cure, and work to prevent homelessness wherever possible.

Housing Rights' policy work is based on the views and experience of the people who contact us for advice who face a variety of barriers when it comes to finding and keeping their home. The supply of affordable, good quality homes which meet people's needs continues to be the backdrop to many of the housing issues our advisers deal with each day. The experience of our clients highlights the extent to which access to a safe and secure home is "a cornerstone of life" as highlighted by the Minister in the Call for Evidence.¹ We therefore welcome the development of the Housing Supply Strategy (referred to in this response as 'the Strategy') and the opportunity to respond to this consultation.

2.0 EXECUTIVE SUMMARY

- **Housing Rights welcomes the development of this strategy and are pleased to contribute to the Call for Evidence. In our view the impact of this strategy could be more fully delivered if the title of the strategy was more representative of the strategy's proposed objectives. "Housing Supply" is a technical term which is directly relevant to the first proposed objective. A broader title may more fully encompass the breadth of objectives in the strategy. Housing Rights notes the adoption in the easy read version of this document of the title "A plan for housing for people in NI" and would readily support the adoption of these sentiments in the main strategy title.**
- **Housing Rights welcomes the recognition in this strategy that inter-departmental working will be key to the strategy's delivery. We note that the NI Audit Office's recommendations in 2017 made specific reference to the nature of silo working between departments and how this impedes progress in addressing homelessness.² Housing Rights views the adoption of a standalone housing outcome in the forthcoming Programme for Government (as committed to in New Decade New Approach) to be imperative in the success of this strategy in that regard. However, in the absence of such an outcome, the Department should consider how else it could operationalise the inter-departmental co-operation necessary to support the delivery of this strategy. Housing Rights has previously called for the adoption of legislation to place a statutory duty to cooperate on relevant bodies to prevent homelessness and such a provision should be considered here.**
- **It is imperative to involve people with lived experience of housing problems and homelessness in the design, development and monitoring of the Strategy. Housing Rights recommends a particular focus on including groups such as**

¹ <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-housing-supply-strategy-call-for-evidence.pdf>

² https://www.niauditoffice.gov.uk/sites/niao/files/media-files/Homelessness%20in%20Northern%20Ireland%20Full%20Report_0.pdf

people living in the private rented sector, as well as people experiencing homelessness, whose voices are often not heard and for whom infrastructure to facilitate their participation in government policy is not as fully developed and resourced.

- **Housing Rights believes that a focus on homelessness prevention is key to the success of the Housing Supply Strategy and views it as imperative that the objective is to prevent homelessness, rather than simply to reduce homelessness. This is particularly the case since the NIHE's Homelessness Strategy is explicitly focused on homelessness prevention rather than reduction.**
- **Whilst both the private rented sector (PRS) and Homelessness are mentioned in the strategy, Housing Rights is concerned by the more muted nature of their inclusion and strongly recommends that there is appropriate focus given in the Strategy to preventing and alleviating homelessness and addressing issues with standards, regulations, affordability and security of tenure in the private rented sector.**
- **Housing Rights believes it is important that the definition of 'sustainable' housing should include the ability of households to sustain their tenancies, regardless of tenure, which must include considerations such as affordability and additional support needs a household may have.**
- **In the context of housing supply, Housing Rights sees it as is crucial that affordable housing is viewed in a more expansive way to allow for consideration of the affordability issues which are relevant to homelessness prevention i.e. an assessment of housing costs and household incomes for the purposes of accessing and sustaining accommodation.**
- **In Housing Rights' experience, the need to improve housing quality is particularly acute in the PRS and we strongly recommend that particular focus is given under this objective of the Strategy to improving housing quality in the private rented sector.**
- **Similarly, Housing Rights is concerned by the comparatively little attention given to the relationship between housing costs and poverty in the private and home owner sectors where there is a well understood and urgent need to address the link between housing circumstance and poverty. Given the acute impact of social security on private renters and struggling home owners, Housing Rights recommends that focus is given to addressing these issues in the 'Housing and Poverty' section of the strategy, with a particular focus on people living in the PRS.**

3.0 **OVERARCHING CONSIDERATIONS**

In addition to responding to the questions below, Housing Rights wishes to highlight a number of overarching considerations which we believe to be key in the development of an effective Housing Supply Strategy.

3.1 **Homelessness Prevention**

Housing Rights works to prevent homelessness wherever possible and we believe that a focus on homelessness prevention is key to the success of the Housing Supply Strategy. A focus on prevention is crucial in protecting people against the human cost of homelessness, which we believe should be policy makers chief concern, but also in terms of the cost to the public purse of dealing with the impact of homelessness, as the Northern Ireland Audit Office (NIAO) highlighted in their 2017 report on Homelessness in Northern Ireland.³ Indeed, the annual cost to the NI public purse of each homeless presentation was estimated in 2015 to range from £4,972.36 to £36,119.34 (depending on the complexity of the situation), with the average deemed to be £15,470.⁴

Housing Rights therefore recommends that the emphasis in the strategy on ‘homelessness reduction’ should be changed to ‘homelessness prevention.’ This would also align this Strategy to relevant Housing Executive (NIHE) strategies such as the Homelessness Strategy and Tenancy Sustainment Strategy and ensure initiatives to prevent homeless are prioritised as soon as, and indeed before, someone finds themselves at risk of homelessness.

3.2 **Cross-tenure focus**

Housing Rights welcomes the recognition in the Call for Evidence that addressing Housing Supply goes beyond the building of social homes and increasing access to home ownership. Whilst each of these tenures are key, the experience of our clients highlights the myriad of issues that exist in the private rented sector (PRS), and the many challenges facing people experiencing homelessness. Whilst both the PRS and Homelessness are mentioned in the strategy, Housing Rights is concerned that the more muted nature of their inclusion does not give them the prioritisation which will be required over the next 15 years if we are to ensure that everyone in NI has access to a good quality, affordable and sustainable home that is appropriate to their needs. **Housing Rights therefore recommends that there is more appropriate focus given in the Strategy to *preventing and alleviating homelessness and addressing issues with standards, regulations, security of tenure in the private rented sector.*** Particularly given the increasing reliance on the PRS to provide homes for low-income families, and the fact that loss of rented accommodation is one of the top three causes of homelessness in NI.⁵

³ [Homelessness in Northern Ireland Full Report 0.pdf \(niauditoffice.gov.uk\)](#)

⁴ “Calculating the cost of homelessness in Northern Ireland? A desk-based study of the range of costs relating to homelessness” Fiona Boyle, 2015

⁵ [Northern Ireland Housing Bulletin October-December 2020 \(communities-ni.gov.uk\)](#)

3.3 Inter-departmental working

Housing Rights welcomes the 'Whole System' approach to Call for Evidence. Similarly, the specific mention of this Strategy in the New Decade New Approach Deal⁶ makes clear the necessity of a whole government approach to ensuring its success. **Housing Rights believes it is essential that a specific housing outcome is included in the Programme for Government to ensure the successful inter-departmental delivery of this strategy.** However, in the absence of such an outcome, the Department should consider how else it could meaningfully operationalise the inter-departmental co-operation necessary to support the delivery of this strategy.

3.4 Co-design

Housing Rights strongly welcomes the commitment in the Strategy to a co-design approach. Given the long-term nature of the strategy, Housing Rights believes there it is imperative to involve people with lived experience of housing problems and homelessness in the design, development and monitoring of the Strategy.

Given the cross-tenure nature of the strategy Housing Rights believes that there should be a focus on including groups such as people living in the private rented sector, as well as people experiencing homelessness, whose voices are often not heard. Housing Rights strongly welcomes the acknowledgement in the Call for Evidence of the need to engage with private renters to inform better policy decisions and enable change.

It may be useful for the Department to consider how best to involve people with lived experience at different stages of the process. For example, through focus group consultations during the initial consultation on the Strategy through to longer-term participation, involving people with lived experience in government decisions regarding housing and homelessness. The Department should consider good practice examples of co-design both locally, such as Renters' Voice, UC:Us and the Northern Ireland Youth Forum, as well as examples from other jurisdictions. For example the Change team in Scotland are a group of people with frontline and personal experience of homelessness who are involved in the development of the Scottish Government's Homelessness Prevention Strategy.⁷

Housing Rights would welcome the opportunity to support the Department in the co-design approach to this strategy.

3.5 Focus / name of strategy

In order to ensure that ensure that the Strategy is gives appropriate focus to all aspects of housing, **Housing Rights recommends that the name of the Strategy should not be limited to supply. It would be appropriate to consider a name such as 'Housing Strategy',** similar to the approach taken in Scotland where the equivalent Strategy as simply been called 'Housing to 2040'. **Equally, as stated above, Housing Rights would welcome the co-option of the title of the easy read version of this strategy in the main document.**

3.6 Issues with Graphs

⁶ [2020-01-08 a new decade a new approach.pdf \(publishing.service.gov.uk\)](#)

⁷ <https://homelessnetwork.scot/change-team/>

Housing Rights notes a lack of clarity with regards to some of the graphs and infographics throughout the Call for Evidence document. It may therefore be useful to consider how to make the information clearer by considering the issues we have outlined in Appendix 1.

4.0 CONSULTATION QUESTIONS (INTRODUCTION)

Q2. Do you agree that a ‘Whole System’ approach given the challenges is the right one?

Ensuring a ‘whole market’ approach

Housing Rights strongly agrees with adopting a ‘Whole System’ approach to this strategy. Whilst Housing Rights strongly welcomes the cross-tenure intention stated in the strategy, we believe it is important that more appropriate focus is given in the Strategy to the private rented sector and homelessness prevention. A ‘whole system’ approach requires a whole market approach and in our view the Strategy as it stands is heavily weighted in its focus on the social rented and owner occupier sectors. While each of these are key in ensuring everyone has access to a good quality, affordable home, it is crucial that the role of the private rented sector, and homelessness prevention, are also prioritised in the strategy given their crucial role in addressing housing supply. This is particularly important given that the PRS in NI now houses 19% of the population,⁸ and is increasingly relied upon to house low income households, together with the fact that loss of rented accommodation is consistently one of the top three causes of homelessness in NI.⁹ **A whole system approach to housing supply will therefore not be effective unless sufficient attention is given in the Strategy to the PRS and homelessness prevention.**

Cross-cutting collaboration: social security

Housing Rights welcomes the commitment to cross-cutting collaboration and policy co-ordination in the strategy and recommends that the impact of social security policy is also considered. As outlined in detail below under ‘Housing and Poverty,’ this is particularly important given the fact that the rise in households living in the PRS has been driven by an increase in young people¹⁰ and single parent households relying on this sector,¹¹ many of whom rely on housing benefits and are therefore impacted by cuts to the Local Housing Allowance (LHA) rate. Given the Department for Communities’ proposal to enable the NIHE to discharge its duty to homeless households by placing them in the PRS, there will likely be a further increase in the number of low-income households relying on this sector to provide them with a home in the coming years.

Interdepartmental delivery structures

⁸ <https://www.communities-ni.gov.uk/system/files/publications/communities/frs-201819.pdf>

⁹ https://www.niauditoffice.gov.uk/sites/niao/files/media-files/Homelessness%20in%20Northern%20Ireland%20Full%20Report_0.pdf

¹⁰ The proportion of young people living in the private rented sector has increased significantly over recent years with 41% of young people aged 25- 34 living in the PRS by 2019 (compared to 18% in 2003).

¹¹ By 2019, 45% of single parent households were living in the PRS (compared to 23% in 2003).

Given the importance of inter-departmental working in the delivery of a 'whole system' strategy, Housing Rights recommends that consideration is given to the structures that will be required to deliver the strategy effectively. **The success of the policy intent of the strategy will only be realised with effective cross departmental strategic and operational involvement.** In this regard, it may be useful to consider learning from the evaluation of the cross-departmental structures established to deliver the homelessness strategy, as well as from the structures used in Housing Strategies in other jurisdictions such as 'Housing to 2040' in Scotland.

Should a specific and standalone housing outcome be included in the forthcoming Programme for Government, a specific Delivery Plan will be developed for this outcome which will, Housing Rights understands, include senior responsible owners from across government departments required to work together towards the realisation of outcome. This structure may provide a useful vehicle to operationalise the cross departmental co-operation required to progress work under the Housing Supply Strategy. Housing Rights would encourage the Department to consider how best to involve non-governmental stakeholders in such structures. Should a specific housing outcome not be included, however, the Department will need to consider what appropriate and effective structures can be used for the delivery of the strategy. The comments in the previous paragraph may be particularly useful in this regard.

Q3. Do you agree with the 15-year timeframe proposed for the Housing Supply Strategy?

Housing Rights has no issue with the proposed 15-year strategy and views it as appropriate for a strategy of this type to be programmed over a 15-year period. Housing Rights notes that the rationale for such a timeframe as explained in the consultation documents is with reference to other strategies at a similar level. Housing Rights agrees with this rationale but would further note that **the strategy should also reference how it links with other strategies which 'fall under' and not just 'sit alongside' it.** For example, Housing Rights would welcome an overt reference to the NIHE Homeless Strategy.

More substantively, Housing Rights would request that the final strategy outline processes within the 15-year timeframe for strategy review. **It is important that the strategy is capable of being responsive and agile to changing socio-economic environment within the 15-year period.** It may therefore be appropriate to review progress in the strategy, check the direction remains appropriate and consider if initiatives or target groups require amendments at intervals within the period.

Q4. Do you agree with the proposed vision for the Strategy?

Housing Rights agrees with this vision, and welcomes the alignment to the specific housing outcome which was committed to in the New Decade New Approach Deal. **The Vision may need to be reviewed if a housing outcome is included in the Programme for Government which has different wording, to ensure this Strategy's vision reflects the finalised wording of the housing outcome.**

Q5. Do you agree with the following proposed objectives for the Strategy?

(a) Increase housing supply and affordable options across all tenures to meet current and future demand.

Housing Rights agrees with this objective; increasing the supply of social housing is key in meeting the housing needs of low-income households who rely on social security support to pay for their housing costs but increasingly have to rely on unaffordable private rentals. Likewise, expanding homeownership access schemes such as co-ownership helps to ensure that those remaining in the PRS are households who prefer the flexibility it offers rather than the increasing numbers of young people who typically would have moved into homeownership but can no longer afford to.

With regard to 'affordable options' **Housing Rights believes it is important that the strategy explicitly recognises that housing must be affordable both in terms of people's ability to access and also critically, in terms of sustaining their home/tenancy. Unless consideration is given to households' ability to sustain their accommodation, further cases of homelessness as a result of affordability will arise which will feed the demand which the strategy aims to address.** Affordable options must also be broader than those which as social or intermediate options. As detailed below under Q6, **it is our view that it would be useful for this strategy to explicitly recognise that in the context of housing supply, it is crucial that affordable housing is viewed in a more expansive way to allow for consideration of the affordability issues which are relevant to homelessness prevention i.e. an assessment of housing costs and household incomes for the purposes of accessing and sustaining accommodation.**

(b) Reduce housing stress and homelessness and improve housing solutions for the most vulnerable.

While we support the spirit of this objective, **Housing Rights views it is as imperative that the objective is to prevent homelessness, rather than simply to reduce homelessness.** As outlined above, prevention is key both when it comes to the human cost of homelessness, and the cost to the public purse of dealing with the impact of homelessness. A focus on homelessness prevention in this Strategy will also be important in ensuring alignment with other relevant Housing Executive (NIHE) strategies such as their Homelessness Strategy and Tenancy Sustainment Strategies.

With regards to the 'housing solutions' referred to in this objective, it is important to note that the use of terminology such as 'housing solutions' is widely used by the NIHE whose Housing Solutions and Support approach is the key element of the Homeless Strategy. If the Department are referring more generally to improving housing options and solutions for the most vulnerable and not specifically to the operational approach taken by NIHE in Housing Solutions, that could be made clearer.

(c) Improve housing quality

Housing Rights strongly supports this objective to improve housing quality across all tenures. Housing Rights understands that significant work was undertaken by the Department in 2016/17 in relation to the Housing Fitness standard with stakeholders agreeing that the current standard is inadequate and alternative models were examined. Despite this work, a revised Housing Fitness has not yet been brought forward. Housing Rights supports work to revise the standard as a necessary first step in achieving this objective to improve housing quality.

In Housing Rights' experience, the need to improve housing quality is particularly acute in the PRS where we have concerns about the current low level of standards and high levels of disrepair in in this sector. The Northern Ireland Housing Executive's House Condition Survey 2016, which reported on the number and proportions of non-decent homes, found that the PRS had the higher proportion of non-decent homes (10.7% of PRS properties, equating to 14,300 properties), compared to 3.1% of social sector properties.¹²

Housing Rights clients' experience also continues to highlight that issues with poor standard housing are disproportionately high in the PRS. Indeed, between April 2020 and March 2021, Housing Rights dealt with over 3,200 issues relating to housing conditions: 71% of these originated in the PRS, compared to 23% in the social rented sector. The experience of our PRS clients highlights the significant inadequacies in the current Housing Fitness Standard, which fails to ensure that people are living in housing of a decent minimum standard. For example, see case study below:

Sharon is a young person in her 20s with severe mental health issues. After spending a few months in different hostels, she managed to secure a private rented tenancy. After moving into her new home, it transpired that the windows on the property were single glazed and the heating system was extremely old. The age of the system made it expensive to heat. A neighbor informed Sharon that the last tenant moved out as the property was "unbearably cold" in the winter. Even during the summer, Sharon had to wear blankets in the house because the house was of such a poor standard. Sharon told Housing Rights that she is dreading the coming winter months.

Under the current Fitness Standard, the stipulation for 'adequate provision for heating' can, in practice, be satisfied by the presence of an electrical socket into which the tenant can plug an electric heater. Our client therefore had no legal or statutory recourse to remedy their situation.

Given that the Local Housing Allowance is based on the lowest 30% of local private rents, it is in this lower end of the market where homeless households are likely to be placed. Housing Rights notes with concern the findings of the 2016 NIHE Housing Condition Survey that low-income households were among the most likely to live in property that fell below the Decent Homes Standard.¹³

Poor fitness standards often exacerbate the affordability issues faced by private renters. Many of the respondents to Housing Rights' recent research highlighted significant issues with poor energy efficiency (heating and insulation issues).¹⁴ This resulted in the respondents' spending excessive amounts on heating their homes which, in turn, affected their ability to pay bills, rent and manage their household expenditure. Indeed, the NIHE Housing Condition Survey 2016 also reported that,

¹² <https://www.nihe.gov.uk/Documents/Research/HCS-2016-Main-Reports/HCS-Main-Report-2016.aspx>

¹³ <https://www.nihe.gov.uk/Documents/Research/HCS-2016-Main-Reports/HCS-Main-Report-2016.aspx>

¹⁴ <https://www.housingrights.org.uk/sites/default/files/policydocs/Preventing%20Homelessness%20and%20Sustaining%20Tenancies%20in%20the%20PRS.pdf>

“The tenure with the highest proportion in fuel poverty in 2016 was the private rented sector.”¹⁵

In research carried out by Housing Rights into accessing and sustaining tenancies in the PRS, housing practitioners suggested the introduction of an ‘MOT’ for housing,¹⁶ which could be applicable across social and private letting.

Housing Rights therefore strongly recommends that particular focus is given under this objective of the Strategy to improving housing quality in the private rented sector.

(d) Ensure the provision of housing options that contribute to the building and maintaining of thriving, inclusive communities and places.

Housing Rights agrees with this objective. However, the Department may also wish to consider how this objective could be reframed to take account not only of the Department’s duties to promote good relations under Section 75(2) of the Northern Ireland Act 1998, but also to promote equality for groups experiencing inequality under Section 75(1) of the same Act.

Q6. The terms good quality, sustainable and affordable mean different things to different people - how would you define these terms?

Good quality

As outlined above under **Q5(c)**, **Housing Rights has serious concerns about the current Fitness Standard and would encourage the Department to expedite work to replace the outdated standard with one which is fit for purpose.** In doing so, consideration should be given to learning from approaches in other jurisdictions. It is Housing Rights’ view that this is a necessary first step to define ‘good quality’.

Sustainable

Housing Rights strongly believes that the definition of ‘sustainable’ housing should include the ability of households to sustain their tenancies, regardless of tenure, which must include considerations such as affordability and additional support needs a household may have. In this regard it may be useful for the Department to consider research carried out by Housing Rights on barriers to sustaining tenancies in the Private Rented Sector.¹⁷

Affordable

Housing Rights understand that the Department has recently agreed a definition of affordable housing for the purposes of creating affordable housing options. In the context of such an overarching strategy which has as a key objective to prevent homelessness, **it is crucial that affordable housing is viewed in a more expansive way to allow for consideration of the affordability issues which are relevant to homelessness prevention i.e. an assessment of housing costs and household incomes for the purposes of accessing and sustaining accommodation.** In this respect, Housing Rights views the work recently carried out by the Affordable Housing

¹⁵ <https://www.nihe.gov.uk/Documents/Research/HCS-2016-Main-Reports/HCS-Main-Report-2016.aspx>

¹⁶ <https://www.housingrights.org.uk/sites/default/files/policydocs/Preventing%20Homelessness%20and%20Sustaining%20Tenancies%20in%20the%20PRS.pdf>

¹⁷ <https://www.housingrights.org.uk/sites/default/files/policydocs/Preventing%20Homelessness%20and%20Sustaining%20Tenancies%20in%20the%20PRS.pdf>

Commission to define affordability is best practice which the Department should adopt.¹⁸

Affordable Housing Commission

The Affordable Housing Commission proposes a new measure of housing affordability, “Rather than focusing on market rents and house prices it defines and measures housing affordability as being what people can afford, be it to rent or to buy.”¹⁹ The approach of the AHC replaces existing market-based definitions and instead views affordability from the “perspective of who is facing housing stress and under what circumstances.”²⁰ The new measure is based on an affordability threshold (30% of household income for those in work) as opposed to the ‘Affordable Rent’ product, which defines affordable housing as 80% of market rent regardless of household income. The Affordable Housing Commission recommends an affordability threshold of 30% of household income; however recent research in Northern Ireland by the Nevin Economic Research Institute has identified other measures of affordability such as the ‘residual income measure’²¹ which would also be useful for the Department to consider, outlined below.

Nevin Economic Research Institute

The NERI Research Working Paper (April 2018) deems that “widely utilised measures of affordability can be blunt instruments to measure housing sufficiency”, and expresses that the housing cost to income ratio measure does not consider whether the income available after housing costs is adequate to meet non-housing costs.²² As such, a ‘residual income measure’ is advocated, which defines housing as affordable if a household is able to afford to meet their other essential needs after paying for the cost of housing. The Research Working Paper from the Nevin Economic Research Institute highlights the relationship between housing costs, income and living standards and it explains that given that housing costs are often the single biggest expenditure, a person’s housing has the potential to affect a wide range of other outcomes.²³ Housing affordability and affordable housing challenges affect a household’s ability to pay for food, utilities, transportation to work, health and childcare expenditures, as well as reducing savings for emergencies, retirement and other opportunities such as pursuing higher education. These challenges may result in decreased opportunities and a lower overall quality of life.

Affordability and Standards

Housing Rights further notes that the Affordable Housing Commission’s work understands not only the interplay between affordability and affordable housing, but also that **the affordability discussion cannot be separated from a discussion around quality and standards**. As a housing advice organisation with experience of assisting people facing problems accessing and sustaining accommodation which is affordable, Housing Rights views the connection between these issues as important and would recommend that the definition recognise this. Indeed, given the low level of

¹⁸ <https://static1.squarespace.com/static/5b9675fc1137a618f278542d/t/5cf55923f41ae70001170311/1559583017920/Defining+and+measuring+housing+affordability.pdf>

¹⁹ Ibid

²⁰ Ibid

²¹ https://www.nerinstitute.net/sites/default/files/research/2019/neri_working_paper_housing_final.pdf

²² Ibid

²³ Ibid

our current Fitness Standards, people in low incomes often find themselves living in properties where the poor conditions are such the cost of maintaining the property at a reasonable degree of comfort in terms of adequacy of heating and insulation, proves to be too expensive to maintain.

Q7. What do you believe are the three main barriers to delivering the objectives for the strategy?

Barrier 1: Meaningful Interdepartmental working

As has been recognised throughout the Call for Evidence, the success of addressing Housing issues including supply is dependent on effective, sustainable inter-departmental working. Housing Rights is mindful of the time and resource constraints facing government Departments and statutory bodies. **It will therefore be key that a standalone Housing Outcome is included in the Programme for Government, and that this Strategy is adopted at an Executive level, in order to ensure that relevant Departments and Statutory bodies are able to appropriately prioritise their time and resources to deliver the objectives of the Strategy.**

Should a specific and standalone housing outcome be included in the forthcoming Programme for Government, a specific Delivery Plan will be developed for this outcome which will, Housing Rights understands, include senior responsible owners from across government departments required to work together towards the realisation of the outcome. This structure may provide a useful vehicle to operationalise the cross departmental co-operation required to progress work under the Housing Supply Strategy. Housing Rights would encourage the Department to consider how best to involve non-governmental stakeholders in such structures. Should a specific housing outcome not be included, however, the Department will need to consider what appropriate and effective structures can be used for the delivery of the strategy.

In a similar vein, **Housing Rights has been calling for a Statutory duty to cooperate on Homelessness to be placed on statutory bodies across housing, health, education and criminal justice.** A study of the approaches to homelessness taken by different regions in the UK and produced by Professor Suzanne Fitzpatrick and her team in 2019 concluded that there was a pressing need for public sector wide duties in relation to homelessness.¹ Again, we are mindful of the time and resource constraints increasingly facing providers of housing, healthcare and other support services. It is natural that under such constraints, such bodies prioritise those duties which they are statutorily obliged to carry out. A statutory duty to co-operate would ensure that those bodies with responsibilities in relation to homelessness, are able to appropriately prioritise their time and resources to tackle homelessness. Correspondingly, a statutory duty to co-operate would ensure the necessary framework exists for such bodies to be held to account for failure to do so, for example through legal avenues such as judicial review.

Without these high-level commitments to inter-departmental working at an Executive and legislative level, the interdepartmental working which is crucial in delivering each of the objectives, is unlikely to succeed.

Barrier 2: Strategy Focus

If appropriate focus is not afforded in this strategy to issues which cause 'demand' this would be a major barrier in achieving the strategy's objectives, given that the supply issues experienced are as a direct consequence of increasing demand. Whilst both the PRS and Homelessness are mentioned in the strategy, as noted above, Housing Rights is concerned that the more muted nature of

their inclusion does not give them the prioritisation which will be required over the next 15 years if we are to ensure that everyone in NI has access to a good quality, affordable and sustainable home that is appropriate to their needs.

Issues with standards, regulation, security of tenure and affordability in the Private Rented Sector make it increasingly difficult for low-income households to find and keep a home in this sector. As a result, loss of rented accommodation is one of the top three causes of homelessness here.²⁴ Therefore, unless standards and regulations are significantly increased and issues with security of tenure and affordability addressed, this sector will not only be unsuitable for providing a long-term home for low-income households, but it will also continue to contribute to the growing pressures on social housing supply due to homelessness as result of loss of rented accommodation. **It is therefore crucial that appropriate focus is given in the Strategy to preventing and alleviating homelessness and addressing issues with standards, regulations, security of tenure in the private rented sector.** Housing Rights believes that failure to do so would prove a major barrier in meeting the objectives of the Strategy.

Barrier 3: Political instability

A third major barrier to achieving the objectives of this strategy is the political instability in the devolved institutions in NI. The impact of the political impasse from January 2017 to January 2020 on the development and progress of housing policy in Northern Ireland is striking. Furthermore, as has been evident over the past year, when the government resumes after such an impasse, the backlog of areas that need to be addressed slows down the pace at which legislative change can be achieved. In periods without a government in NI civil servants have to follow the policy direction identified in previous governments which makes it difficult to respond in an agile way to a changing environment. **Political instability therefore has the potential to pose a significant barrier to achieving the objectives of this Strategy.**

Q8. To what extent do you agree that there is a need to establish a more robust understanding of NI Housing Stock, e.g. by tenure, location, condition, etc.?

Housing Rights strongly agrees with the need to establish a more robust understanding of NI Housing Stock, particularly by tenure. In England, Land Registry provides information on tenure breakdown for all properties,²⁵ in NI we have to rely on surveys for this data. Whilst national population-wide surveys are useful, the information is not collected in order to provide information on housing tenure and occupation (aside from the House Conditions Survey which is only carried out every 5 years). Surveys also rely on a sample of the population or housing stock, which may or may not closely reflect the population in terms of how they occupy their properties.

The issues regarding survey data and housing tenure are apparent when the differences are considered between the percentages for housing tenure reported by the NI Continuous Household Survey²⁶ (CHS) and the Family Resources Survey²⁷ (FRS), including issues with how Housing Associations are categorised in each (at one stage regarded as 'private rented sector' in one and 'social sector' in the other). The only concise information we have regarding housing tenure is from Census data – which is only available every 10 years. Land and Property Service data may be able to provide more accurate and timely information on housing tenure (as long as privately

²⁴ [Northern Ireland Housing Bulletin October-December 2020 \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk/northern-ireland-housing-bulletin-october-december-2020)

²⁵ <https://use-land-property-data.service.gov.uk/>

²⁶ <https://www.nisra.gov.uk/publications/chs-results>

²⁷ <https://www.communities-ni.gov.uk/topics/family-resources-survey>

rented properties are categorised as such, which is not always the case). The comparison table below showing CHS/FRS and Census data for 2011 shows inconsistencies between the capturing of PRS data in these surveys:

2011: CHS / FRS / Census data

	Census	CHS	FRS
Owned Outright	32	35	36
Owned Mortgage	35	33	30
NIHE	12	12	13
Housing Assoc	3	3	3
Rent - Private **	14	16	18
Rent Free / Other	3	1	

5.0 EQUALITY AND HUMAN RIGHTS

Q20. The Equality Commission has framed local housing demand and supply in relation to three constructs – accessibility; adequacy; and sustainability. Are you content with this framework or are there other issues that may warrant inclusion?

Housing Rights agrees this categorisation is appropriate. It is notable however that these words mean different things to different audiences and it is therefore important to give fuller information on the constructs used by the Equality Commission Northern Ireland which –defines these terms as per below;

- The **accessibility** of housing - the opportunities to secure housing
- The **adequacy** of housing - the housing meets cultural, physical or other needs and is safe
- The **sustainability** of housing - the tenure is secure and affordable in the long term

6.0 HOUSING AND POVERTY

Q26. Is there a need for this housing supply strategy to play a role in reducing poverty?

Housing Rights strongly agrees that “to address the issue of housing supply, we need to examine the challenges associated with poverty that drive increased need and consider what could be undertaken to address these issues alongside – as opposed to separately from – increasing the supply of housing.”²⁸ Indeed, we believe this Strategy has the potential to reduce poverty if bold steps are taken. While the Strategy rightly highlights the impact of issues with Housing Costs and low incomes on social tenants, **Housing Rights is concerned by the comparatively little attention given to the relationship between housing costs and poverty in the private and home owner sectors where the impact of social security cuts has made the situation for low-income households even more precarious and where there is an urgent need to address the link between housing circumstance and poverty. As outlined below a wealth of evidence supports the relationship between housing**

²⁸ <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-housing-supply-strategy-call-for-evidence.pdf>

and poverty for people living in both these tenures and this ought to be more fully considered by the Department in this section of the Strategy.

7.1 Housing and Poverty in the private rented sector

The experience of Housing Rights' clients highlights the links between housing and poverty and the key role that housing and homelessness policy has to play in reducing poverty. Housing Rights sees this acutely with clients from low-income households living in the private rented sector. Indeed private renters consistently make up a disproportionate number of the calls we receive to our helpline, with affordability being among their chief concerns.²⁹

Housing Costs in the PRS

Housing costs generally make the first and most substantial claim on household income and are often the single biggest item of household expenditure.³⁰ As such, housing costs have the potential to affect a wide range of other outcomes, often leading households to reduce their expenditure on other necessities such as food, clothing and healthcare.³¹ Research by NERI in 2018 showed **that for those households in the bottom income quintile in NI, housing costs are statistically significantly higher for households in the PRS than they are for social tenants or homeowners.**³² Whilst median net household income in the lowest income quintile was the same for private and social tenants, housing costs were higher for PRS tenants (even when taking social security support for housing costs into consideration) and so made a greater demand on their resources, leaving less to spend on other necessities.

Social security cuts in the PRS

Around half of all PRS households rely on social security support to pay for their housing. The inadequacy of LHA rates in NI to pay for PRS properties is evidenced in Housing Rights research, with 90% of advertised properties unaffordable for households who have to rely on Housing Benefit/Universal Credit to pay for their housing costs.³³

Despite the welcome step to restore the LHA rate to cover the cheapest 30% of market rents in response to Covid19, there continues to be a significant shortfall for many between their rent and the amount of housing benefits they receive. Average monthly shortfalls for people in receipt of UC Housing Costs range from £110 to £139 across the Broad Rental Market Areas.³⁴ Given that rents are continuing to increase in the

²⁹ Whilst around 18% of all households live in PRS accommodation, in 2020/21 37% of all Housing Rights Helpline cases were from PRS tenants. Furthermore, almost half of the calls to our Helpline regarding affordability issues were from PRS clients.

³⁰ [Stone, M.E. \(2006\) A Housing Affordability Standard for the UK. Housing Studies. 21:4 pp453-476](#)

³¹ [Gabriel, M., Jacobs, K., Arthurson, K., Burke, T., Yates, J. \(2005\) Conceptualising and measuring the housing affordability problem. Swinburne Research Bank;](#) [McAuley, \(2020\) Preventing Homelessness and Sustaining Tenancies in the PRS: Scoping Report. Housing Rights.](#)

³² Wilson, L. and MacFlynn, P. (2018) Housing Provision in NI and its Implications for Living Standards and Poverty. Nevin Economic Research Institute. Working Paper 2017/No 52

³³ [https://www.housingrights.org.uk/sites/default/files/policydocs/Falling Behind LHA full research Oct 2019.pdf](https://www.housingrights.org.uk/sites/default/files/policydocs/Falling%20Behind%20LHA%20full%20research%202019.pdf)

³⁴ AQW 18618/17-22 [Questions Search Results \(niassembly.gov.uk\)](#)

PRS,³⁵ and the LHA rate has once again been frozen since April 2021, shortfalls between rent and housing benefits will increase further.

(a) Children and single parent families

Family Resources Survey data shows that an increasing number of families in NI now rely on PRS accommodation.³⁶ Whilst the proportion of households with children living in social housing has remained fairly constant since 2003 (between 7% and 10%), the proportion of households with children living in the PRS has more than trebled (from 6% in 2003 to 19% in 2019).³⁷ Moreover, the proportion of single parent households living in the PRS has seen the largest increase of any demographic over the past two decades. In 2003, over half of all single parent households were living in social housing (52%), but by 2019 this had decreased to 34%. There was a corresponding increase in the proportion of single parent households living in the PRS – from 23% in 2003 to 45% in 2019.³⁸ These figures suggest that single parent households have been increasingly excluded from accessing social housing and are renting privately.

Furthermore, single parent households are more likely to be impacted by poverty and are therefore more likely to be in need of support to pay for their housing costs.³⁹ In addition, women with children have been disproportionately affected by reduced hours and earnings as a result of the pandemic.⁴⁰ Single parents are also more likely to live in 2-bedroom properties and the rents for these types of properties have increased disproportionately from other types of properties,⁴¹ particularly at the lower end of the market, which would be the properties which low income single parent households are more likely to occupy. This suggests that single parent households will be more adversely affected by any cuts to the LHA rates, and failure to provide additional support to low-income private renters. In addition, families with children are facing the impact of other social security cuts such as the two-child limit, under which affected families are losing an average of £2,780 per child per year, and the benefit cap under which families lose an average of £200 per month.⁴²

(b) Young people

Young people have traditionally been more likely to live in the PRS, including many students living in shared accommodation. However, whilst in 2003 18% of households headed by people aged between 24 and 35 lived in the PRS, by 2019 that proportion

³⁵ <https://insights.propertypal.com/flash-commentary/>

³⁶ Housing Rights analysis of Family Resource Survey data from 2003 to 2019.

³⁷ Ibid

³⁸ Ibid

³⁹ Whilst people living in single parent households make up around 9% of the population, they are over-represented in households below the poverty threshold (after housing costs) – 17% of individuals in poverty are living in single parent households. <https://www.communities-ni.gov.uk/publications/households-below-average-income-northern-ireland-201819>

⁴⁰ <https://www.nerinstitute.net/blog/womens-livelihoods-must-not-be-sacrificed-after-lockdown>

⁴¹ <https://www.housingrights.org.uk/sites/default/files/policydocs/Falling%20Behind%20LHA%20full%20research%20Oct%202019.pdf>

⁴² [Benefit Cap Statistics - February 2021 | Department for Communities \(communities-ni.gov.uk\)](#)

had increased to 41%.⁴³ There is a corresponding decrease in the proportion of people of this age living in owner-occupied housing (from 62% in 2003 to 40% in 2019).⁴⁴ These figures suggest that the impact of the financial crash (including the housing boom and bust) adversely affected the ability of young households to access home-ownership and this is reflected in the affordability crisis which is highlighted in the growing literature on 'Generation Rent'. Furthermore, over half of those employed in the gig economy are under 35⁴⁵ and young workers are more likely to be employed in sectors which have been affected by job loss or reduced hours as a result of Covid-19.⁴⁶ Forecasters from the Ulster University Economic Policy Centre (UUEPC) indicate that it could be four to five years before the NI economy returns to pre-pandemic levels of output.⁴⁷ Young people are therefore more likely to be relying on housing benefits to pay their rent. Furthermore, young people are impacted by one of the most acute LHA cuts, the Shared Accommodation Rate. This means that single people under 35 living in the PRS are usually only entitled to housing benefits to cover a single room in a shared property. Those living alone therefore face a significant shortfall between their rent and the amount of housing benefits they receive.⁴⁸

Quality of PRS accommodation

The impact of poverty on access to housing is also one which must take into account the quality of housing which a household can access, given income restraints. Indeed research by Housing Rights showed that often properties which were affordable to low-income clients living in the PRS were poor quality.⁴⁹ The Marmot Review (2011) concluded that poor quality housing exacerbates the issues faced by people experience poverty, with evidence that the effects of poverty on living standards are intensified by poor quality housing.⁵⁰

Precurity

The differential impact of the Covid-19 pandemic on individuals and households exposed some of the inequalities faced by households in NI. In particular, the differences in claims for UC from social tenants and PRS tenants was enlightening. According to figures released by the Department in September 2020, there were 127,310 individual claimants on UC in May 2020, up from 65,190 in February – i.e. the claimant count almost doubled in only 3 months.⁵¹ There were 38,200 households with new claims for UC between March and May 2020, including 12,660 claims for support

⁴³ Housing Rights analysis of Family Resources Survey data.

⁴⁴ Ibid

⁴⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/687553/The_characteristics_of_those_in_the_gig_economy.pdf

⁴⁶ J Buchanan, PropertyPal (2020) analysis of ONS Business Impact of Covid-19 Survey

⁴⁷ [Magennis, E., Esmond, B and Hetherington, G. \(2020\) Pathways to economic recovery after Covid-19 in NI. Discussion Paper 3. Ulster University Economic Policy Centre.](#)

⁴⁸ Of the 4,872 households entitled to the shared accommodation rate in 2017, the majority were actually living in one-bedroom properties: <https://www.nihe.gov.uk/Documents/Research/Welfare-reform-BRMA/northern-ireland-broad-rental-market-areas-scoping.aspx>

⁴⁹ [McAuley, M. \(2020\). Preventing Homelessness and Sustaining Tenancies in the PRS: Scoping Project. Housing Rights](#)

⁵⁰ [Marmot, M. \(2010\) Fair Society, Healthy Lives: the Marmot Review: strategic review of health inequalities in England post 2010](#)

⁵¹ <https://www.communities-ni.gov.uk/publications/universal-credit-statistics-may-2020>

for housing costs.⁵² However, when we break the new claims for housing costs down by tenure, we can see that the vast majority of claims for support for housing costs came from private rented sector tenants. The proportion of new claims for support for housing costs were on average 15% higher among PRS tenants than social tenants in the year leading up to the pandemic. However, between March and May the rate of new claims from PRS tenants was more than double that of SRS tenants. This suggests that PRS tenants were in a more precarious position with regard to paying for their housing costs than social tenants were. Indeed at the onset of the crisis almost three quarters of the COVID-19 related calls to Housing Rights' Helpline were from people living in the PRS, with affordability being one of the key issues raised. All of this suggests that PRS tenants were more disproportionately affected by the pandemic and subsequent lockdowns.⁵³

Poverty

The link between housing and poverty is well documented⁵⁴ and as a result of the issues outlined above, this is acutely felt by low income private renters. Research by NIHE in 2018 showed that a higher proportion of households in the PRS in receipt of Housing Benefit were at risk of poverty (56%) compared to social tenants in receipt of Housing Benefit (41%).⁵⁵ Indeed in 2018, NERI further found that there were close to 34,000 households at-risk-of-poverty after housing costs in the private rented sector, compared to just over 29,000 households in the social rented sector.⁵⁶ The NIHE Housing Condition Survey 2016 also reported that, "The tenure with the highest proportion in fuel poverty in 2016 was the private rented sector."⁵⁷

Given these findings, **it would be useful for the Department to give further detail to substantiate their finding that social tenants are "at the highest risk of relative housing poverty (both before and after housing costs)."**⁵⁸

Given the acute impact of housing costs and low-incomes on people living in the PRS, **Housing Rights strongly recommends that particular focus is given to addressing these issues in the 'Housing and Poverty' section of the strategy.** This is especially important in the context of loss of rented accommodation consistently being one of the top causes of homelessness.

7.2 Struggling Homeowners

With the financial impact of the COVID-19 crisis continuing to be felt, Housing Rights are also increasingly worried about the impact on homeowners who are struggling to meet their mortgage payments. Whilst Housing Rights has welcomed the safety

⁵² Ibid

⁵³ [The 'Perfect Storm': The impact of Covid-19 on private renters in Northern Ireland | Housing Rights](#)

⁵⁴ [Tunstall, R., et al. \(2013\) The Links Between Housing and Poverty: an evidence review. Joseph Rowntree Foundation.](#)

⁵⁵ [NIHE \(2018\) NI Broad Rental Market Areas Scoping Study and Impact Assessment P.83.](#)

⁵⁶ Wilson, L. and MacFlynn, P. (2018) Housing Provision in NI and its Implications for Living Standards and Poverty. Nevin Economic Research Institute. Working Paper 2017/No 52

⁵⁷ <https://www.nihe.gov.uk/Documents/Research/HCS-2016-Main-Reports/HCS-Main-Report-2016.aspx>

⁵⁸ [Housing Supply Strategy - Call for Evidence \(communities-ni.gov.uk\)](#)

nets, such as the mortgage holidays, for homeowners impacted by COVID-19, we are concerned that they are masking the problems faced by struggling homeowners which are likely to become increasingly apparent in the coming months.

Between 2013 and 2018 the Westminster Government introduced changes which weakened the social security support available to struggling homeowners through Support for Mortgage Interest. For example, SMI was changed from a grant to an interest bearing loan, and the waiting period before it can be access increased from 13 to 39 weeks.

The threat of an economic downturn is of particular concern for homeowners in Northern Ireland where there are a higher percentage of marginal home owners, and a remaining legacy of higher levels of negative equity. Indeed, research by The Joseph Rowntree Foundation in 2018 found that:

- NI has a greater proportion of home-owners in poverty than the rest of the UK.
- Twice as many of NI's mortgaged households are behind with their mortgage repayments compared to the whole of the UK.
- NI's households with mortgages had more than three times the incidence of negative equity than those across the UK.
- Working households form the majority of households struggling with mortgage debt and thus are unable to claim any help with housing costs.⁵⁹

Housing Rights therefore recommends that the 'Housing and Poverty' section of the strategy also considers the impact of social security cuts on struggling homeowners, in order to meet the objective of preventing homelessness.

7.3 Intra-departmental working

Given the impact of housing on poverty and vice versa, and the crucial role that social security support plays in alleviating poverty and preventing homelessness, **effective partnership with the social security division of the Department will be critical in the success of the Housing Supply Strategy.** Housing Rights welcomes the recent intra-departmental working on Discretionary Housing Payments particularly in response to the pandemic and encourages the Department to adopt similar initiatives as required in the lifetime of this strategy.

Q27. Currently housing stress is identified as 'those experiencing intimidation, insecurity of tenure, housing conditions, health and social wellbeing issues'. Do you have any comments on this definition of housing stress or are there other causes of housing stress that need to be considered?

Housing Rights assumes that the reference to the definition of housing stress in this question is intended to reflect the fact that a person is deemed to be in housing stress if they are awarded 30 or more points under the Common Selection Scheme and the that points are awarded under categories which include "intimidation, insecurity of tenure, housing conditions and health and social wellbeing issues." Given the importance of ensuring this Strategy is linked down to other relevant housing and homelessness policies and strategies, Housing Rights recommends that either the

⁵⁹ <https://www.jrf.org.uk/report/home-owners-and-poverty-northern-ireland>

agreed definition of Housing Stress as 30+ selection scheme points is adopted in this strategy, or a clear distinction is made.

If, however the intent is to open up the definition of 'Housing Stress' as used in practice, Housing Rights feels it would be more appropriate to do so separately, outside of this strategy, where it can be given appropriate focus.

Q28. To what extent do you agree that more needs to be done from an interdepartmental perspective to improve the lives and life chances of those who are homeless or at risk of homelessness?

Housing Rights strongly agrees that more needs to be done from an interdepartmental perspective, indeed as noted above, **it is our view that effective interdepartmental working will be key to the success of this Strategy.**

Inter-departmental impact of homelessness and poor housing

Failure to invest in preventing homelessness and tackling poor housing is not cost neutral. In addition to the human cost, homelessness has significant financial implications across the public sector, as the Northern Ireland Audit Office (NIAO) highlighted in their 2017 report on Homelessness in Northern Ireland.⁶⁰ Indeed the annual cost to the NI public purse of each homeless presentation was estimated in 2015 to range from £4,972.36 to £36,119.34 (depending on the complexity of the situation), with the average deemed to be £15,470.⁶¹ Adequate funding for homelessness prevention will therefore save spending across a number of Departments including Communities, Health and Justice. Where prevention has not been successful, it is also crucial that sufficient funding is provided to services aimed at alleviating homelessness.

Similarly, in addition to the human cost, poor housing also poses a significant cost to the public purse. In 2016 the Northern Ireland Housing Executive (NIHE) reported that the cost to the NHS in dealing with 'Category 1 Hazards'⁶² which are deemed to equate to 'poor housing,' was £39.5 million per year.⁶³ NIHE further reported that this cost to the NHS only represents 10% of total societal costs of poor housing, which are estimated to be £401million per annum.⁶⁴

Interdepartmental working at an Executive and Statutory level

As noted above, Housing Rights is mindful of the time and resource constraints facing government Departments and statutory bodies. **It will therefore be key that a standalone Housing Outcome is included in the Programme for Government, and that this Strategy is adopted at an Executive level,** in order to ensure that relevant Departments and Statutory bodies are able to appropriately prioritise their time and resources to deliver the objectives of the Strategy, including homelessness prevention.

⁶⁰ [Homelessness in Northern Ireland Full Report 0.pdf \(niauditoffice.gov.uk\)](#)

⁶¹ Calculating the cost of homelessness in Northern Ireland? A desk-based study of the range of costs relating to homelessness" Fiona Boyle, 2015

⁶² These include excess cold, damp & mould, and falls on stairs

⁶³ <https://www.nihe.gov.uk/Documents/Research/HCS-2016-Additional-Reports/The-cost-of-poor-housing-in-Northern-Ireland-2016.aspx>

⁶⁴ <https://www.nihe.gov.uk/Documents/Research/HCS-2016-Additional-Reports/The-cost-of-poor-housing-in-Northern-Ireland-2016.aspx>

In a similar vein, **Housing Rights has been calling for a Statutory duty to cooperate on Homelessness to be placed on statutory bodies across housing, health, education and criminal justice.** Again we are mindful of the time and resource constraints increasingly facing providers of housing, healthcare and other support services. It is natural that under such constraints, such bodies prioritise those duties which they are statutorily obliged to carry out. A statutory duty to co-operate would ensure that those bodies with responsibilities in relation to homelessness, are able to appropriately prioritise their time and resources to tackle homelessness. Correspondingly, a statutory duty to co-operate would ensure the necessary framework exists for such bodies to be held to account for failure to do so. Legal avenues such as judicial review would be viable mechanisms for accountability.

Q29. How do we help homeless people transition from temporary accommodation to long term homes?

Housing Rights believes that in order to help people experiencing homelessness transition from temporary accommodation into long term homes, **people must be supported not only to access but to sustain long term tenancies, particularly in the private rented sector where tenants do not have access to the same support infrastructure provided by social landlords.** For both social and private tenants, Housing Rights views access to independent housing advice & support as a key component in accessing and sustaining suitable long-term homes.

For people who are experiencing chronic homelessness, Housing Rights recommends the adoption of the ‘Pathways Housing First’ approach⁶⁵ which includes the following components:

- Housing as a basic human right.
- Respect, warmth and compassion for all clients (a ‘client’ being a person using the Housing First service).
- A commitment to working with clients for as long as they need.
- Scattered site housing, i.e. ordinary PRS housing that is scattered across a city or region and not concentrated in any one building, street or postcode.
- Separation of housing and services.
- Consumer choice and self-determination.
- A recovery orientation in relation to mental health problems and drug and alcohol use.
- A Harm reduction, rather than abstinence based, approach in relation to drugs and alcohol.

Housing Rights further recommends that the Department considers good practice and learning from initiatives in other jurisdictions aimed at helping people experiencing homelessness into long term homes. For example the ‘Settled Homes for All’ service which has recently been set up in Scotland.⁶⁶

⁶⁵ A Ellison et al. ‘Meeting the housing needs of vulnerable homeless people in the private rented sector in Northern Ireland’ (November 2012)

⁶⁶ [Settled Homes for All — Aberdeen Cyrenians \(aberdeen-cyrenians.org\)](http://aberdeen-cyrenians.org)

Q30. To what extent do you agree that housing plays a significant role in reducing economic inactivity/enabling individuals to take up employment?

Housing Rights agrees with this assertion. Access to shelter is one of the most pressing needs and availability and access to adequate shelter has the potential to impact on all other areas of life. Mullainathan and Shafir outline how scarcity of resources impacts on an individual's ability to engage in clear decision-making and other cognitive skills.⁶⁷ They argue that the individual under conditions of scarcity has his/her energy diverted by stress and worry and therefore has less 'available bandwidth' to divert to other issues. By extension then, those individuals who are impacted negatively by their housing circumstances (including worry about affordability or where their health and wellbeing is affected by their house conditions) would have less energy to use on taking up employment opportunities.

8.0 SKILLS

Q49. To what extent do you agree that the Housing Supply Strategy could act as a stimulus to improve and modernise construction skills and increase the importance of the sector?

While Housing Rights recognises the need for improvement of construction skills, we believe it is also both desirable and appropriate for the Strategy to act as a stimulus for improving skills when it comes to supporting people to access and sustain their tenancy or homeownership. For example, to safeguard the potential of the Housing Solutions model in preventing homelessness in Northern Ireland and ensure independent housing advice work is integrated with and complementary to statutory advice work, **it is our view that it is imperative housing advice is quality assured in the same way that debt advice now is. This can be achieved through the development of an NI Housing Advice Quality Standard.**

⁶⁷ Mullainathan, S. and Shafir, E. (2013) Scarcity: The True Cost of Not Having Enough. Penguin Books

Appendix 1

Issues with infographics for consideration:

- P.14 - Infographic on 'Economic Activity' should perhaps read 'Economic Inactivity' as the explanatory note says that it is 'the proportion of people aged from 16-64 who were not working and not seeking or available for work'.
- P.14 NI - The keys need to be reconsidered in the Labour Market Trends graph
- P.14 - Again the keys need to be reconsidered in the Limiting Long standing illness graph, it appears they should be reversed
- P.27 - It would be useful to provide information on where the statistics to support the infographics in Figure 4 come from.
- It is also not clear what the infographic 'Business 2018' means and would be useful to provide clarity.
- Similarly, because of the long commuting distances for many rural dwellers (who work in our cities and towns), it would be interesting to know where the information on shorter rural commuting distance comes from.
- Furthermore, it may be useful to clearly define 'absolute poverty' to explain the statistics in this infographic

Housing Rights are grateful for the opportunity to respond to this consultation. For further information on this submission, please contact Housing Rights' Policy Officer, Kerry Logan at kerry@housingrights.org.uk.