



## **Consortium for the Regional Support for Women in Disadvantaged and Rural Areas**

### **Response to: A Fundamental Review of Social Housing Allocations - Consultation on Proposals**

**Issued by: Department for Communities**

**December 2017**

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Enabling women into non-traditional employment

Foyle Women's  
Information  
Network



## **Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas**

### **1. Introduction**

**1.1** This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.

**1.2** The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.<sup>1</sup> The seven groups are as follows:

- Training for Women Network (TWN) – Project Lead
- Women's Resource and Development Agency (WRDA)
- Women's Support Network (WSN)
- Northern Ireland's Rural Women's Network (NIRWN)
- Women's TEC
- Women's Centre Derry
- Foyle Women's Information Network (FWIN)

**1.3** The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in

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<sup>1</sup> Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisations.

disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

**1.4** This response is informed by women's perspectives articulated in Consortium engagement arrangements, reflecting the views of Consortium regional membership bases.

## **2. General comments**

The Women's Regional Consortium appreciates the opportunity to respond to the Department for Communities' 'A fundamental review of social housing allocations: consultation on proposals'.<sup>2</sup>

As research affirms, by correlating with outcomes in, inter alia, health, education, employment, economic prosperity and community cohesion, the provision of adequate, affordable, safe and stable housing can positively impact wellbeing at the level of the individual, the household, the community and society at large.<sup>3</sup> For this reason, the notion of the provision of such housing by public authorities (i.e. social housing) remains a fundamental component of social justice discourse on wellbeing at the level of the individual and beyond. Such discourse can more usually tend to encompass questions of tenant wellbeing and interests posited in the language of inclusion, equality, recognition and rights fulfilment.

From this perspective, we welcome the consultation as affirmation of government intent to help make the scheme governing the allocation of social

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<sup>2</sup> Department for Communities, 'A fundamental review of social housing allocations consultation on proposals', DFC: Belfast, 2017.

<sup>3</sup> On this, see, for example, Houses of Parliament Parliamentary Office of Science and Technology, 'Housing and health', *Postnote*, 371, January 2011, Houses of Parliament: London; California Department of Housing and Community Development 'Housing and family economic well-being', CDHCD: Los Angeles: 2013; K. Wardrip et al., 'The role of affordable housing in creating jobs and stimulating local economic development: a review of the literature', Centre for Housing Policy, Washington: 2011; and, Centre for the Study of Social Policy, 'Affordable housing as a platform for improving family well-being: federal funding and policy opportunities', CSSP: Los Angeles: 2011.

homes in Northern Ireland 'more fair, transparent and effective for all... [and] to enable it to work better for people in need'.<sup>4</sup>

That said, we have a number of concerns about the nature and scope of the proposals, reflecting participant contributions in the aforementioned Consortium engagement. More precisely, these concerns reflect **(i)** participant perceptions of some aspects of some of the proposals as potentially unfair and requiring further (careful) consideration by government; and, **(ii)** participant consensus that policy development on social housing in the jurisdiction should first and foremostly prioritise the question of new build to address substantial unmet demand for such provision, escalating homelessness and the increased reliance of disadvantaged cohorts on the private rented sector (with attendant issues of rent affordability, insecurity of tenure and constrained wellbeing). In short, participants held that housing policy in the region had essentially failed to deliver to acceptable levels and should thus be subject to a fundamental rethink. The remainder of the paper sets out these concerns and associated issues.

### **3. Specific comments**

#### **3.1 New build: fundamental priority**

The consultation document notes that an improved allocations system 'cannot deliver more social homes'.<sup>5</sup> Cognisant of this reality, participants directed their attention beyond the scope of the document in order to make a case for new build as a fundamental priority for policy development on social housing in the region. That case cited a moral-political imperative on government to address more effectively the social justice dilemma of escalating homelessness and unmet demand for different kinds of social homes, including variants to accommodate minority and complex needs.

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<sup>4</sup> DFC, op. cit.

<sup>5</sup> Ibid.

We recognise that plans for new build social housing remain ongoing in the jurisdiction.<sup>6</sup> However, implementation of these plans continues to prove essentially insufficient in addressing the scale and diversity of demand.

As previous Consortium engagement on social housing policy development affirmed, with Northern Ireland Housing Executive (NIHE) rents ‘comparably much lower than average housing association rents’, demand for NIHE new build remains particularly strong among disadvantaged women.<sup>7</sup>

We therefore note with particular interest that the NIHE has itself apparently undertaken to supplement housing association intervention on new build with its own intervention.<sup>8</sup> However, closer reading reveals that the latter translates as NIHE intent to build new homes only ‘*where this involves the redevelopment or regeneration of [existing] stock in [NIHE] estates*’.<sup>9</sup>

Research indicates that there has been ‘significant underinvestment’ in existing NIHE housing stock in recent decades following the 2008 global financial crisis and subsequent United Kingdom austerity retrenchments, and so this commitment to investment in existing stock is, of course, to be welcomed.<sup>10</sup> *However, if the commitment to new build essentially entails regenerating/redeveloping existing stock, this begs the question as to the likely impact of this commitment on the actual number of available social homes, i.e. the extent to which existing NIHE stock numbers might actually be increased.*

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<sup>6</sup> C. Bailey, ‘Housing development back on the agenda’, *Inside Housing*, 2017. [Online]. Available at: <https://www.insidehousing.co.uk/home/housing-development-back-on-the-agenda-52343>.

<sup>7</sup> P. Gray, ‘A return to housebuilding – what are the options?’ *Inside Housing*, 2017. [Online]. Available at: <https://www.insidehousing.co.uk/comment/comment/a-return-to-housebuilding--what-are-the-options-51927>.

<sup>8</sup> Bailey, op. cit.

<sup>9</sup> Ibid.

<sup>10</sup> Gray, op. cit. See also, Savills, ‘DSD/NIHE main stock condition report 2014/15’, DSD/Housing Executive: Belfast, 2015.

## **Recommendation**

We recommend that government redouble its efforts to invest in new build in the social housing sector in order to address more effectively the social justice dilemma of escalating homelessness and unmet diverse demand for such tenure in Northern Ireland.

### **3.2 Proposal fairness**

The proposals are aimed at making the allocations scheme 'more fair'. Yet participants had certain reservations on this front. Broadly, the idea here was that the prospect of fairness would intrinsically rely on government subjecting the proposals to proper (i.e. comprehensive, rigorous and robust) assessment for any likely asymmetrical adverse impact across affected cohorts. The proposals spotlighted included plans to:

- remove intimidation and temporary accommodation points from the scheme;
- restrict the transfer of tenancy;
- reduce the number of reasonable offers of a social home;
- exclude individuals from the scheme for 'unacceptable behaviour'; and,
- limit the size of home offered to what welfare benefits permit.

It was held that, in undertaking such assessment, the department should carefully reconsider the complexity of the issues involved in this debate.

Cited complicating factors in this debate included the following: (i) disrepair in NIHE housing stock correlated with significant underinvestment; (ii) persistent unmet demand for social housing to accommodate minority and complex needs, including the needs of the most vulnerable and disadvantaged;<sup>11</sup> (iii) the scale of unmet demand in certain areas (Derry and Strabane were cited as examples of areas with significant need); (iv) a sustained lack of offers of social homes in applicants' preferred locations, resulting in disadvantaged women being housed in areas at some distance from their respective support networks, with attendant risk of constrained wellbeing; (v) the perception that the

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<sup>11</sup> We note with interest the proposal to subject the allocations scheme for 'specialised' properties, and those for the most vulnerable, to a separate review. DFC, *op. cit.*, p.21.

allocations system was vulnerable to abuse by individuals falsely claiming intimidation in order to gain housing priority; and, (vi) poor planning of social housing stock location associated with tenant experience of infrastructural shortfalls in transport and other amenities.

An appeal was subsequently made for more meaningful and effective remedial action from government to address the status quo. It was noted that any such action should be properly informed by engagement with affected stakeholders at the level of the community: '[government] could take real heed of the needs and views of the grassroots issues within communities and maybe implement a housing policy that is more responsive' (focus group discussion).

### **Recommendation**

It is recommended that government give further regard to the question of proposal fairness, ensuring it properly assesses the plans for any potential differential impact on affected cohorts' everyday lives, including any additional unfair disruption of access to housing.

### **3.3 Shortage of social homes: disadvantaged women's wellbeing**

The Consortium is concerned that the shortage of social homes in Northern Ireland has significantly increased the reliance of disadvantaged women on the private rented sector, with attendant issues for women's wellbeing as tenants.

As with other regions of the United Kingdom, against a backdrop of shrinking social housing, low-income families in Northern Ireland have become increasingly reliant on the private rented sector, where security of tenure is significantly lacking, giving rise to increased housing vulnerability.<sup>12</sup> Following the advent of the most recent recession in the United Kingdom and subsequent austerity agenda, sharp rises in poverty have occurred in this sector in the region.<sup>13</sup> When rising housing costs are factored in, the relative rate of poverty

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<sup>12</sup> A. Wallace, 'Housing and communities' inequalities in Northern Ireland', University of York: York, 2015, p.13.

<sup>13</sup> A. Tinson and T. MacInnes, 'Monitoring poverty and social exclusion in Northern Ireland 2016', Joseph Rowntree Foundation: London, 2016.

'increases substantially' for Northern Ireland households in this sector, as compared to other tenures.<sup>14</sup>

Women are over-represented in the private rented sector. And, it has been evidenced that post-recession housing cost increases in the sector in Northern Ireland have 'substantially' increased the relative rate of poverty for women, as compared to men.<sup>15</sup>

Women entered the periods of recession and austerity at hand with a structurally generated lack of financial independence correlated with unfair gender inequality, which rendered them 'particularly vulnerable to the impact of the downturn ... from the outset', as reflected, for example, in gendered vulnerability in the labour market.<sup>16</sup> And, this gendered differential in socio-economic starting positions contributed to the gendered nature of the adverse impact of austerity, with women disproportionately affected.<sup>17</sup>

There has, of course, been some commitment by government to mitigate some dimensions of austerity-driven reform of social welfare. However, there is evidence that where such time-limited mitigation ceases, affected cohorts can tend to experience increased financial and housing vulnerability.<sup>18</sup> More specifically, cessation of austerity-driven uprating changes in local housing allowance affecting private renters, impacting housing affordability, have been associated with rent arrears and landlord action on eviction.<sup>19</sup> It is projected that

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<sup>14</sup> Ibid.

<sup>15</sup> Wallace, op. cit., p. 56 and p.20.

<sup>16</sup> K. Rake, 'Are women bearing the burden of the recession?' Fawcett Society: London, 2009, p.4. On the relationship between gender and poverty, see F. Bennett and M. Daly, 'Poverty through a gender lens: evidence and policy review on gender and poverty', Joseph Rowntree Foundation/University of Oxford: London/Oxford, 2014.

<sup>17</sup> On the gender impact of the United Kingdom austerity model see, Fawcett Society, 'The impact of austerity on women, policy briefing', Fawcett Society: London, 2012; Scottish Government, 'The gender impact of welfare reform', Scottish Government: Edinburgh: 2013; J. Portes and H. Reed, 'Austerity has hit women, ethnic minorities and the disabled most', *The Guardian*, 31 July 2014; and, TUC, 'The impact on women of recession and austerity', TUC: London, 2015. [Online]. Available at: <https://www.tuc.org.uk/economic-issues/equality-issues/gender-equality/equal-pay/impact-women-recession-and-austerity>

<sup>18</sup> C. Beatty et al. 'Monitoring the impact of recent measures affecting housing benefit and local housing allowances in the private sector in Northern Ireland – final report', Sheffield Hallam University: Sheffield, 2014.

<sup>19</sup> Ibid.



landlord reluctance to accommodate such cohorts may generate longer-term problems of supply at the lower end of the market in Northern Ireland, exacerbating conditions of affordability, overcrowding and homelessness.<sup>20</sup> This conjunction raises substantive social justice questions about post-mitigation financial vulnerability and housing security in the jurisdiction.

### **Recommendation**

It is recommended that government seek to properly capture and take due account of the relationship between austerity measures, the shortage of social homes and rises in women's housing vulnerability and constrained wellbeing.

### **3.4 Assessing housing disadvantage: disaggregated data dilemma**

The Consortium is further concerned about an apparent lack of disaggregated data at the level of devolved and local government required to facilitate accurate assessment of housing inequality in Northern Ireland, including that pertaining to ethnic minority and multiple identities.

As we have seen, research points to interaction between the gendered disproportionateness of austerity and women's housing disadvantage.<sup>21</sup> Yet the question of its manifestation in the Northern Ireland-specific case remains distinctly underexplored.<sup>22</sup>

Attempts to analyse housing inequality in the Northern Ireland case confront a substantive problem concerning a dearth of relevant disaggregation in both departmentally collated housing data and that collated at the level of local government district.<sup>23</sup> This includes a lack of disaggregation around some section 75 equality grounds, particularly in respect of disabled people, ethnic minorities and individuals with multiple identities.<sup>24</sup>

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<sup>20</sup> T. O'Sullivan, G. Young and K. Gibb, 'The Belfast metropolitan housing market area: a local housing system analysis', University of Glasgow: Glasgow, 2012, p.73.

<sup>21</sup> L. Vickery, 'Deepening disadvantages in housing markets for women', *Local Economy* 27(8), pp.796-803, 2012.

<sup>22</sup> See Wallace, op. cit.

<sup>23</sup> O'Sullivan, Young and Gibb, op. cit. See Wallace, op. cit., p.14.

<sup>24</sup> Wallace, op. cit., p.14.

The availability of a robust disaggregated evidence base clearly remains a prerequisite of effective housing planning and policy by public authorities. And, since 'housing [is] one of the vehicles through which gender relations are mediated and sustained',<sup>25</sup> for reasons of social justice and gender equality, this should expressly include a suitably robust gender disaggregated data dimension.

### **Recommendation**

We recommend that government attend to any gaps in disaggregated data on different cohorts' experience of housing in Northern Ireland such as might (i) threaten robust analysis of housing inequality in the region across section 75 grounds and, in turn, (ii) undermine effective policymaking to address that inequality.

### **4. Conclusion**

We have noted some reservations in respect of the proposals at hand. But, as further noted, participant discussion in Consortium engagement on the proposals shifted focus to the question of new build in the social housing sector. We recognise that extended austerity places obvious and well-rehearsed constraints on the realisation of government interventionism on new build. Yet, as the government's own research affirms: 'given the scale and impact of ... indicators of unmet housing need and affordability' *government intervention 'remains essential to meeting the housing needs and aspirations of a large section of the population'*, particularly the most vulnerable.<sup>26</sup> And, as previously observed, the satisfaction of such needs and aspirations can correlate with wellbeing at the level of the individual, the household, the community and society at large.

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<sup>25</sup> P. Mayock et al. 'Women's homelessness and domestic violence: (in)visible interactions', in P. Mayock and, J. Bretherton (eds), *Women's Homelessness in Europe*, Palgrave Macmillan: London, 2016, p.138.

<sup>26</sup> Department for Communities and Local Government, 'Impact assessment for affordable rent', Department for Communities and Local Government, London, 2011, p.13.

Accordingly, it has been argued that what is at stake in this debate are substantive social justice concerns. The moral-political imperative to take account of these concerns - though outwith the remit of the consultation – continues to place urgent demands on policy development in the region to 'do more' to deliver sustainable substantive remedial change for all affected.