

Equality Commission response to the proposed Delivery Plan for Programme for Government Indicators 8 and 48 (Number of households in housing stress; gap between the number of houses we need, and the number of houses we have)

In January 2016, the Commission set out a number of priorities¹ for delivery via the work of government over the 2016-21 mandate. In our July 2016 response to the Programme for Government Framework consultation, we had sought an additional measure / indicator on sharing in housing and communities.

The following considers the delivery plan content (version downloaded on 17 November 2016) against key inequalities and policy priorities highlighted by the Commission in January 2016.

We hope that this information, in tandem with our response to the consultation on the draft PfG, will be of assistance in the further development of the delivery plan.

1. Develop safe, shared communities based on equality, dignity and respect.

- a. Further, although Northern Ireland saw a decrease in residential segregation, across all sectors, between 2001 and 2011^{2, 3}, it is still the case that the operation of housing markets in Northern Ireland, leads to differing experiences of waiting lists for social housing, with a particular impact on households with a Catholic or Other religion household reference person⁴. Most recently, our draft Statement on Key Inequalities in Housing and Communities⁵ suggested that a range of steps need to be taken to address supply and demand factors - in support of both meeting objective need, and to address segregation in social housing.
- b. The Commission has consistently called for the expansion of shared housing as a necessary step to progress integration in our society. These calls have included recommendations for: a review of how the social housing allocations scheme could be used to reduce the risk of polarisation; to put measures in place to build trust and confidence between divided communities; and to set out proposals for building shared neighbourhoods. We recommend that actions to advance these matters are set out in a revised delivery plan.
- c. In our response to the PfG Framework consultation, we had recommended the inclusion of additional indicators aimed at tracking progress in securing increased sharing in housing. While this has not yet been included in the PfG, we do note that the delivery plan commits: ‘to support more shared housing and reduce the extent and impact of residential segregation, we will develop a programme of financial incentives using money available through the Fresh

¹ ECNI (2016), Equality Priorities: [Programme for Government and Budget Recommendations](#)

² Shuttleworth, I. and Lloyd, C. (2013) Moving apart or moving together? A snapshot of residential segregation from the 2011 Census.

³ Nolan, P. (2014) [Northern Ireland Peace Monitoring Report. Number Three.](#)

⁴ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland.](#)

⁵ ECNI (2016) [Draft Statement on Key Inequalities in Housing and Accommodation](#)

Start agreement to incentivise the development of more mixed tenure, mixed use sites underpinned by a shared ethos.’ We recommend that the delivery plan makes clear how progress in this area will be tracked (including for Section 75 categories).

- d. While welcoming the delivery plan commitment to incentivise developments, the scale or format of the financial incentives is not provided nor is there any detail as to how this action would work in practice. For example, it does not specify how a ‘shared ethos’ would be achieved, demonstrated or measured. We recommend that this is addressed in a revised delivery plan.

2. Ensure that everyone has access to a safe, secure home and enjoys the right to independent living, including for people with disabilities and older people.

Affordable housing options for older people and people with disabilities

- a. We note that the delivery plan proposes to develop affordable housing options for older people and people with disabilities. We recommend that the delivery plan commits to ensuring the application of accessible housing standards to all new builds. Over time, this would significantly reduce the need for formal care services and costly adaptations to the home in the future. Ensuring that all new builds in private tenures comply with accessible standards, would better facilitate individuals to secure a home and remain in it.
- b. We note the proposals to streamline the adaptations and disabled grants process to reduce waiting times and increase the provision of accessible homes. We have recommended that access to funding for adaptations and provision thereof is made easier. Adaptations should be available across tenures, and easy to access both in terms of using the service, speed of delivery and cost. Given the emphasis within government policy, particularly Transforming Your Care, on the delivery of social care within the home, the availability of housing adaptations is essential.

Assessing housing needs of older people

- c. We note that the delivery plan proposes to stimulate demand for supply of affordable accommodation for older people. However, the means of achieving this and the measure of success is not set out. We recommend that this is addressed in the delivery plan.
- d. We recommend further research to understand the housing expectations and requirements of accommodation for older people in order to meet this need. At the end of March 2014, the age group that experienced the longest social housing waiting times to be re-housed was the 60 – 64 years age group⁶. The demographic trend of an ageing population is contributing to an increase

⁶ Wallace, A (2015) Housing and Communities’ Inequalities in Northern Ireland

in demand for support services and specialised housing in old age⁷. However, it has also been suggested that sheltered housing has become less attractive to fit, active older people⁸. We believe that research into housing needs and preferences, and geographical patterns of need, may help contribute to ensuring a balance in provision.

Independent living

- e. The Commission recommends the delivery plan include actions to ensure access to adequate, sustainable and long-term independent living provision for all people with disabilities for whom it is a viable housing option. The social care model must ensure that disabled people are free to choose the type of assistance they require to support a good quality of life and prevent isolation and social hardship. Furthermore, the transition to community based health and social care services and home-based care using the mixed economy model of private and community / voluntary providers must not result in a diminution of health and social care services in particular for marginalised and excluded groups such as disabled people, older people and carers.
- f. Research⁹ carried out on behalf of the Equality Commission in 2014 reported that 'many people with disabilities in Northern Ireland lack the choice, control and freedom to determine where and with whom they live.'
- g. We also welcome that indicator 42's delivery plan acknowledges the need for cross cutting action including improving independent living and the provision of suitable homes for people with disabilities. We recommend that your delivery plan includes co-ordinated actions to advance this goal.
- h. We reiterate our recommendation that the delivery plan should include commitments to ensure that: accessible housing standards should apply to all new builds; that access to funding for adaptations and provision thereof is made easier; that the housing needs of older people are assessed; and that adequate, sustainable and long term independent living provision is accessible for all disabled people for whom it is a viable housing option.

3. Address the housing needs of particular equality groups, such as Irish Travellers, and minority ethnic communities including migrant workers and refugees.

- a. We welcome the commitment to develop affordable housing solutions to meet the needs of single people aged under 35 on benefits, and are interested to see proposals for how this will be taken forward.

⁷ Northern Ireland Housing Executive (Aug 2008) [Older People Housing Policy Review Action Plan 2008 – 2010](#)

⁸ Professor Paris, C, Emeritus Professor of Housing, Ulster University (Mar 2013) [Future need and demand for appropriate models of accommodation and associated services for older people](#)

⁹ Byrne et al (2014) [UNCRPD: Shortfalls in public policy and programme delivery in Northern Ireland relative to the Articles of the UNCRPD](#) at page 108

- b. We note however, the lack of consideration of actions to meet the needs of minority ethnic communities including Travellers. Our draft Statement on Key Inequalities in Housing and Accommodation¹⁰ highlights the particular issues facing some minority ethnic groups including overcrowding, poor conditions and insecurity of tenure. Furthermore, our race policy priorities and recommendations call for the establishment of a multi-agency taskforce on Traveller accommodation; specific measures to address the housing needs of migrants; accessible information and training for relevant front line staff on the entitlements of EU migrants; and a co-ordinated strategic policy response to the needs of asylum seekers and refugees. We recommend that the final delivery plan includes actions in support of advancing these recommendations.

Traveller accommodation

- c. The Commission continues to advocate the need for an adequate programme of accommodation to meet the needs of the Irish Traveller community and remains concerned by the 'severe undersupply of decent, culturally sensitive accommodation for travellers, which provides meaningful choice for householders regarding their way of life'¹¹.
- d. We reiterate our concern that 'an undersupply of appropriate accommodation, the lack of basic amenities on emergency sites and the level of permanence of this provision is central to the high level of social exclusion and poverty that Travellers experience'¹².
- e. The Commission reiterates its recommendation of a review of the appropriateness of a separate planning mechanism for Traveller families applying to establish serviced family sites in the countryside. When attempting to develop a site for their own and extended families in the countryside, applications from Travellers are dealt with under PPS 12 and specifically HS3¹³ of the Planning Regulations. This is a different process from that used by members of the settled community. We welcome the extension of HS3 in 2013 to allow for planning approval to be granted for the development of serviced sites in the countryside¹⁴. However, the Commission remains concerned that planning applications for a permanent serviced site are considered under a different set of policies to an application for a permanent dwelling of traditional construction. Of particular note, the requirement for a site license for a Travellers' serviced site remains, while there is no similar requirement for traditional bricks and mortar developments.
- f. We recommend specific actions in the delivery plans to address these points.

¹⁰ ECNI (2016) [Draft Statement on Key Inequalities in Housing and Accommodation](#)

¹¹ ECNI (2009) [Outlining Minimum Standards for Traveller Accommodation](#), p9

¹² ECNI (2016) [Proposals for inclusion in UNCERD \(Convention on the Elimination of All Forms of Racial Discrimination\) Committee 'List of Themes'](#)

¹³ DoE (2013) [PPS 12: Policy HS3 \(Amended\) 'Travellers Accommodation'](#)

¹⁴ Prior to this, there was only provision for grouped housing and transit sites in rural areas

Minority ethnic communities

- g. Our Statement on Key Inequalities in Housing highlighted that migrant workers are often subject to tied accommodation with poor conditions and overcrowding. It further found that minority ethnic people, particularly Roma, Irish Travellers, Asian, Black and Other ethnic groups, experience overcrowding more often than the general population and white people.
- h. These inequalities demonstrate the limited accommodation choices which may be available to migrants and minority ethnic groups. Furthermore, they may lack a network of family and friends with knowledge of the Northern Ireland housing market, which would enable them to make better informed choices.
- i. The Commission has recommended that research is carried out to determine reasons for overcrowding among minority ethnic groups. The Northern Ireland Census found that around 9.5% of the general and white populations experienced overcrowding, compared to 29.7% of Irish Travellers, 24.3% of Asian ethnic groups; and 29.7% of Black ethnic groups. Although limited United Kingdom wide research on overcrowding exists, none specific to Northern Ireland has been sourced to provide information on its causes. Such research could assist in developing responses to the problem. While a number of hypotheses can be made such as sharing to save on rent or expenses, or groups of friends wishing to live together, robust research does not appear to have been undertaken on this issue.
- j. We recommend that the final delivery plan includes actions in support of advancing this matter.

4. We recommend that all relevant PfG measures are tracked for the impact across Section 75 grounds and that gaps in equality data are addressed.

- a. With particular reference to data, we restate our view that the indicator 'number of households in housing stress' should collect data and also report progress by Section 75 category.
- b. It is our general view that data should be collected across all Section 75 grounds, across all relevant actions. We note that while data is collected by gender, age, marital status and religion, it is not available by disability, sexual orientation, race, and having dependants. The Commission recommends action to fill significant and specific data gaps in relation to a number of equality grounds.

- c. Furthermore, the Commission recommends action to ensure data is sufficiently disaggregated to allow for meaningful equality analysis, to better inform public policy interventions. For example, key housing datasets offer limited detail with regard to data on minority ethnic groups and migrants. Instead, any analysis must rely on small scale surveys and qualitative data. We recommend that the final delivery plan includes commitments in support of addressing these shortfalls.

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