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15 September 2020

Dear Mr Goudy

**Re: Consultation – Older People’s Housing Strategy 2020/21–2025/26**

1. The Equality Commission welcomes the opportunity to respond to the Northern Ireland Housing Executive’s (NIHE) Draft Older People’s Housing Strategy 2020/21-2025/26. We welcome the overall aim of the Strategy to ‘ensure that services, policies, initiatives and activities consider and meet the needs of our ageing population’.
2. The Commission recommends that the programme of work for Government includes actions to 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<sup>1</sup>.
3. We note that the Strategy outlines plans to develop and deliver new services and initiatives under four high-level delivery themes supported by high-level action plans. The Commission looks forward to the publication of regular reports on performance against the high-level objectives.
4. Please note that the response is limited to areas relevant to the Commission’s statutory remit.

**Theme 1: Planning for the Future**

Exploring Housing Options for Older People

*Accessible Housing*

5. The Commission continues to call for the provision of information regarding the availability of accessible housing<sup>2</sup>. In 2018, the Commission welcomed the interim housing register for social housing with a rolling programme planned to

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<sup>1</sup> ECNI (2016) consultation response to [Executive Office: Draft Programme for Government Framework](#). Full response

<sup>2</sup> ECNI (Feb 2019) [Equality in Housing and Communities: Policy Recommendations](#). Full Report

increase its coverage to include housing association stock and private accommodation<sup>3</sup>.

6. The Strategy states that during the period 2018 to 2019, 18,200 people presented as homeless, of which 14% were older people. Of these, 50% of older people presenting as homeless were due to their 'accommodation not reasonable - physical health'. 38% were owner-occupiers, 26% were from the private rented sector, and 20% were NIHE tenants<sup>4</sup>. We have previously noted that this trend is increasing over time. The NIHE attributed this to, among other things, our ageing population and instances of complex needs such as disability<sup>5</sup>. This demonstrates the importance of easy to access and affordable home adaptations.
7. The Commission continues to recommend that accessible housing standards should be applied to all new builds, including, as a minimum, the extension of the Lifetime Homes Standard to new builds across all tenures<sup>6</sup> and welcomes the commitment within the Strategy to seek to influence the adoption of the standard to general housing stock in the private sector. Over time the universal application of accessible standards would significantly reduce the need for formal care services and costly home adaptations in the future<sup>7</sup>.
8. Consideration should be given to the potential for further impacts of the COVID-19 pandemic, or for similar situations, and learning should be built into planning.
9. The Strategy proposes a number of areas by which success will be measured. One such area is 'supported people to remain in their homes where appropriate'. Enabling older people to remain in their own homes (as long as it is viable and they wish it) is a core element to securing and maintaining personal independence. We continue to recommend the provision of easy to access and affordable adaptation services across all tenures – including by streamlining existing processes and reducing waiting times<sup>8</sup>, to ensure older people's independence in their own home.
10. We recommend that all planning takes account of the impact of Welfare Reform on older people.

### Supporting Independent Living

#### *Grants and Adaptations*

11. We welcome the action taken by the NIHE to reduce the steps to securing adaptation services within the home. However, as adaptations funding is currently only available to persons with a disability, we continue to recommend

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<sup>3</sup> Letter correspondence (20 July 2018), NIHE to ECNI

<sup>4</sup> NIHE (2020) Consultation on the Northern Ireland Housing Executive, Draft Older People's Housing Strategy 2020/21 – 2025/26. Page 25

<sup>5</sup> ECNI (Feb 2019) [Equality in Housing and Communities: Policy Recommendations](#). Full Report

<sup>6</sup> ECNI (Dec 2017) [Age Equality: Policy Priorities and Recommendations](#). Full Report

<sup>7</sup> ECNI (Feb 2019) [Equality in Housing and Communities: Policy Recommendations](#). Full Report

<sup>8</sup> ECNI (Feb 2019) [Equality in Housing and Communities: Policy Recommendations](#). Full Report

that consideration is given to extending the Disabled Facilities Grant to older non-disabled people with health needs<sup>9</sup>.

### *Sheltered Housing*

12. When considering suitable housing for older people the Commission recommends understanding the accommodation needs, preferences and expectations of older people<sup>10</sup>. The Strategy states that sheltered housing was mainly built in the 1970s/1980s, and that it continues to be a popular housing option for many older people<sup>11</sup>. We also note that it may not be the accommodation of choice for all<sup>12</sup>. We therefore welcome the suggestion of carrying 'out further research on the sheltered accommodation model as a future housing option'<sup>13</sup>.

### *Energy Efficient Homes*

13. The Active Ageing Strategy 2016-2021<sup>14</sup> highlights fuel poverty should remain a priority for action and we welcome the Strategy's acknowledgement that 'older people are more likely to be impacted by fuel poverty'. Whilst acknowledging the improvement made in energy efficiency, such as the Affordable Warmth Scheme, we recommend actions to further advance energy efficiency and to implement a fuel-brokering scheme across all tenures.

### *Assistive technology*

14. Page 39 of the draft Strategy proposes the incorporation of good design principles such as the Housing and Ageing Population Panel for Innovation (HAPPI) to assist with high quality housing in later life. This includes compatibility with emerging telecare and tele-healthcare technologies. We highlight the need to raise awareness and uptake amongst older people of assistive technologies to access health, social care and well-being services<sup>15</sup>, to ensure the effective use of complex and advanced digital solutions.
15. Ofcom's 2020 report stated that older adults are more likely to be non-internet users. The report states that, 30% of non-internet users are aged 65 to 74 years of age, rising to 51% of older people aged 75 years and over<sup>16</sup>. When introducing systems that make use of information technology (IT) and/or the internet it will be important to take into account lower rates of IT awareness and/or internet usage by older people<sup>17</sup> or people with sensory disabilities compared to that of the general population.

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<sup>9</sup> ECNI (Feb 2019) [Equality in Housing and Communities: Policy Recommendations](#). Full Report  
ECNI (Dec 2017) [Age Equality: Policy Priorities and Recommendations](#). Full Report

<sup>10</sup> ECNI (Feb 2019) [Equality in Housing and Communities: Policy Recommendations](#). Full Report

<sup>11</sup> NIHE (2020) Consultation on the Northern Ireland Housing Executive, Draft Older People's Housing Strategy 2020/21 – 2025/26. Page 47

<sup>12</sup> 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

<sup>13</sup> NIHE (2020) Consultation on the Northern Ireland Housing Executive, Draft Older People's Housing Strategy 2020/21 – 2025/26. Page 48

<sup>14</sup> OFMDFM (2016) [Active Ageing Strategy 2016-2021](#)

<sup>15</sup> ECNI (Dec 2017) [Age Equality: Policy Priorities and Recommendations](#). Full Report

<sup>16</sup> OFCOM (Jun 2020) [Online Nation: 2020 Report](#) Pg 7

<sup>17</sup> Age UK, [Introducing another World: older people and digital inclusion](#),

## Theme 2: Promoting and Maintaining People's Dignity

### *Supporting People*

16. We recognise the importance of the Supporting People programme in supporting individuals to live independently. A 2016 action plan<sup>18</sup> identified 13 recommendations following a review of the programme<sup>19</sup>. We urge their prompt implementation, particularly as regards how they address the barriers to independent living as set out above.

### *Fear from Crime and Anti-Social Behaviour*

17. The Commission welcomes the aims within the new Community Safety Strategy 2020-2023 to tackle the fear of crime for older people. We continue to recommend that the Government should take action to address the fear of crime among older people<sup>20</sup>.
18. Intergenerational engagement initiatives can be used for reducing fear of crime for older people. For example, an evaluation<sup>21</sup> of Linking Generations Northern Ireland's Intergenerational Safer Communities Project which ran from September 2013 to March 2015, reported that, 73% of participants agreed that the project had helped address the fear of crime in their area.
19. While a number of strategies<sup>22</sup> exist to reinforce actual and perceived safety, evidence suggests that delivery is dependent on adequately resourced and targeted actions across Government policy. Delivery of commitments within the high-level action plan is therefore essential.

## Theme 3 - Housing Advice for Older People

20. The Commission welcomes the proposal within the high level action plan to provide housing support, information and advice in varying formats to engage different target audiences, including older people, about key housing related issues. We recommend that communication with older people on the range, type and number of services available is given the same consideration and not limited to online channels. We refer you to paragraphs 14 and 15 of our response and recommend that the low usage of internet by older people is taken into consideration.

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<sup>18</sup> DSD (2016) [Action plan for the implementation of the Supporting People review](#)

<sup>19</sup> The Supporting People Programme aims 'to establish a strategic, integrated policy and funding framework to... enable vulnerable people to live independently in the community, in all types of accommodation and tenure' [Department for Communities website, accessed 15.06.16](#)

<sup>20</sup> ECNI (Dec 2017) [Age Equality: Policy Priorities and Recommendations](#). Full Report

<sup>21</sup> The Atlantic Philanthropies & Linking Generations Northern Ireland (Dec 2015) [Evaluation of the Linking Generations Northern Ireland Programme 2011 - 2014](#) (pg 10)

<sup>22</sup> Such as the Community Safety Strategy 2020-2023, 'Policing and Community Safety Partnerships / Active Ageing Strategy 2016-2021

## Theme 4 – Promoting Participation

### *Community Participation*

21. We note that the NIHE has ‘a number of community involvement and participation forums which allow customers to help inform and shape our services [..]’<sup>23</sup>. Older people, although well represented in public appointments, report more generally that they feel they are not fully involved in policymaking<sup>24</sup>.
22. The Commission continues to recommend the full and effective involvement of those from across the full range of equality categories in the design, delivery, monitoring and evaluation of strategic actions; and to build capacity within relevant sectors<sup>25</sup>.
23. We hope that this response is of assistance. Please feel free to contact me if a discussion of any of the points raised would be of use.

Yours sincerely



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<sup>23</sup> NIHE (2020) Consultation on the Northern Ireland Housing Executive, Draft Older People’s Housing Strategy 2020/21 – 2025/26. Page 65

<sup>24</sup> Age NI (2015) [Agenda for Later Life 2015: Public policy for later life in Northern Ireland](#)

<sup>25</sup> ECNI (2019) [Equality in Participation in Public Life: Policy Recommendations](#). Full Report