

Equality Commission

FOR NORTHERN IRELAND



Equality in Housing and Communities

SUMMARY: Policy Recommendations

1 Priorities and overarching areas

- 1.1 Housing is a basic human need and provides a foundation for family and community life. Good quality, affordable housing in safe, sustainable communities is essential to ensuring health, well-being and a prosperous society.
- 1.2 The Commission is mindful of the complex relationships that exist between housing and other domains. Addressing key inequalities will not only require work across a range of Departments, agencies and functions of government, but also by organisations who have responsibilities for, or an interest in, housing and communities in Northern Ireland.
- 1.3 The Commission is aware of the proactive steps taken by a range of bodies, including government departments and the housing sector more broadly, to promote equality across the Section 75 grounds. Whilst we both recognise and welcome progress that that has been made, it is clear that challenges remain.
- 1.4 Developed from a range of research and evidence sources, and the Commission's wider work over a number of years, this short document sets out the Commission's current priorities for action.

Priority areas for intervention

- 1.5 The Commission considers, following engagement with stakeholders and wider analysis, that there are immediate opportunities and/or a particular pressing need to secure change in relation to:
 - advancing sharing in housing while ensuring objectively assessed need is met (page 4);
 - addressing the longer social housing waiting list for Catholic households (page 12);
 - improving the provision of disability related accommodation (page 7); and
 - tackling the under-reporting of hate incidents and crimes and increase outcome rates (page 6).

Overarching areas for action

- 1.6 While the Commission will work to encourage prompt action to address the above, we also recommend action by government, officials and key stakeholders to advance the full range of our recommendations as set out further below, towards tackling the inequalities identified in 2017 *Statement on Key Inequalities in Housing and Communities*¹.
- 1.7 The Commission calls for targeted actions across the following overarching areas to address key inequalities, and advance equality of opportunity and good relations:
- **Develop shared, safe communities based on equality, dignity and respect.**
 - **Ensure that everyone has access to a sustainable, secure home and enjoys the right to independent living.**
 - **Address the specific housing needs of particular equality groups.**
- 1.8 We also call for action across two additional cross-cutting areas:
- **Mitigate the long-term negative impacts of Welfare Reform.**
 - **Improve equality data collection and analysis.**
- 1.9 These overarching areas form a framework for the following, more specific recommendations.

1 ECNI (2017) [Statement on Key Inequalities in Housing and Communities in Northern Ireland](#)

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

Advance sharing in housing, while ensuring that objectively assessed housing need is met.

- 2.1 The Commission restates its view on the value of shared housing and that segregated housing in Northern Ireland is not the way forward for our society. We also recognise that people need to feel safe where they live, and consider that actions are needed to encourage and incentivise integration.
- 2.2 While reiterating the importance of ensuring that housing demand is met on the basis of objectively assessed need, actions which advance sharing in housing could also serve to expand housing markets; increase opportunities to meet objectively assessed housing need; and sharing more generally in Northern Ireland.
- 2.3 We recommend actions designed to incentivise and advance safe, shared housing and communities based on equality, dignity and respect.
- 2.4 The Commission considers that actions to advance sharing should also extend beyond a narrow focus on community background. We reiterate our recommendations that the focus of actions to advance sharing should be across all Section 75 grounds; and across a range of public policy domains. Shared communities should include shared housing, as well as shared education, employment, shopping and places of leisure.
- 2.5 As set out in our 2013 Submission to the Panel of Parties (Haass)² we highlight the importance of political leadership and recommend the regulation of the display of flags, based on the principles contained in the Flags (NI) Order. We recommend a range of steps to facilitate expressions of identity in a sensitive and non-divisive manner, while also recommending consideration of the extent to which flags and emblems on private property increase community tensions and discourage the two communities from sharing public spaces.

2 ECNI (2013) [Submission to the Panel of Parties](#)

- 2.6 We recommend that the Government makes clear how progress in this area will be tracked (including for all Section 75 categories). We also continue to recommend that the Programme for Government include an additional indicator to track progress in securing increased sharing in housing.

Implement specific long-term measures to eliminate discrimination and intimidation; tackle prejudicial attitudes; and promote values of acceptance and respect for difference.

- 2.7 Access to adequate and sustainable housing will be maximised where families and individuals from across the Section 75 grounds are able to feel safe in their homes and communities.
- 2.8 We recommend³ that the programme of work for Government includes priority actions to challenge prejudicial attitudes, behaviour and hate crime, to ensure that public spaces, communities, workplaces and services are free from intimidation, harassment and / or discrimination across the equality grounds.
- 2.9 We reiterate our recommendations to ensure prompt implementation of existing and awaited equality and good relations strategies through comprehensive, measurable, monitored and evaluated action plans. These include the strategies on Race, Sexual Orientation, Disability, Gender and Age.
- 2.10 The Commission is also of the view that sharing in education provision has a key role to play in advancing cohesion, sharing and integration across all equality grounds⁴. We consider that *‘education has a role in shaping an individual’s views, their conduct, their relationships with others, and it has the potential to counter negative images and views that they can be exposed to outside of a school’*⁵.

3 ECNI (2016) [Programme for Government](#)

4 ECNI (2015) [Sharing in Education – summary policy position](#)

5 ECNI (2008) [Every Child an Equal Child](#) at page 5

Further tackle the under-reporting of hate incidents and crimes (against persons and dwellings), and increase outcome rates.

- 2.11 We welcome the Northern Ireland Policing Board's thematic reviews in relation to transphobic⁶ and homophobic⁷, and racist⁸ hate crime and recommend that actions are taken by the PSNI to ensure the full implementation of outstanding recommendations.
- 2.12 We recommend detailed follow-up work to track the effectiveness of these actions, including to report on positive progress and/or identify key lessons.
- 2.13 In relation to detection, we repeat our recommendation, as per the 2010 Criminal Justice Inspectorate report, that there should be joined up data to track the progress of hate crimes through the criminal justice system. This would allow for better analysis of how such cases are dealt with and identify areas where remedial action is required.

Address the fear of crime among older people.

- 2.14 Actions must not only focus on tackling crime but also the perception of the prevalence of crime against older people. While a number of strategies⁹ 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 action plans is therefore essential.
- 2.15 We reiterate our 2017 recommendation that the Programme for Government¹⁰ should include a commitment to take actions to address the fear of crime amongst older people. We further recommend the adoption of specific outcomes and associated measures towards tackling the fear of crime amongst older people.

6 NIPB (2012) [Thematic Review Policing with and for LGB and Trans people](#)

7 NIPB (2012) [Thematic Review Policing with and for LGB and Trans people](#)

8 NIPB (2017) [Thematic Review of Policing Race Hate Crime](#)

9 Such as the Community Safety Strategy, 'Building Safer, Shared and Confident Communities 2012-2017 / Policing and Community Safety Partnerships / Active Ageing Strategy 2016-2021

10 ECNI (Jan 2017) response to draft Delivery Plan for Indicator 1: [Prevalence rate \(% of the population who were victims of any NI Crime Survey crime\)](#) (Para 1.14)

3 Ensure that everyone has access to a sustainable home and enjoys the right to independent living

Ensure application of accessible housing standards to all new builds.

- 3.1 We consider that more needs to be done to ensure that all new builds in private tenures comply with accessible standards, so as to better facilitate individuals to secure a home and remain in it. We note recognition within proposed government policy of the need to increase the provision of accessible homes¹¹. Over time, the universal application of accessible standards would significantly reduce the need for formal care services and costly home adaptations in the future¹².
- 3.2 The Lifetime Homes Standard uses a set of 16 design criteria to build homes that are inclusive, accessible and adaptable. It is complemented by wheelchair standard housing *‘the designs of which have been evolving to meet the needs of assisted wheelchair users and carers’*¹³. The 2013 Interdepartmental Review of Housing Adaptations Services¹⁴ states that *‘Lifetime homes standards have limitations when needs become more complex and therefore some people may require the use of purpose designed wheelchair dwellings’*.

Provide information regarding the availability of accessible accommodation.

- 3.3 Accessible housing is most likely to be found within social housing¹⁵. However, NIHE’s 2012 Audit of Inequalities¹⁶ notes *‘anecdotal evidence suggests that demand may be rising [within the private rented sector] as more people find themselves in inaccessible private rented property, either because of the shortage of social housing, or because they cannot afford / get a mortgage to purchase a property’*.

11 NI Executive (2017) [PfG Delivery Plan indicators 8 and 48](#)

12 Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#) at page 141

13 NIHE (2013) [Interdepartmental Review of Housing Adaptation Services](#)

14 NIHE (2013) [Interdepartmental Review of Housing Adaptation Services](#)

15 NISRA (2013) [Census 2011, Table DC4413NI](#)

16 NIHE (2012) [Audit of Inequalities](#)

- 3.4 We note and welcome that an interim accessible housing register for social housing is live and that a rolling programme is planned to increase its coverage including to housing association stock and private accommodation¹⁷.

Ensure the provision of easy to access and affordable adaptation services across all tenures - including by streamlining existing processes and reducing waiting times.

- 3.5 A person with disabilities may require adaptations to their existing or prospective home. We note recognition within the draft departmental plans of the need to streamline the adaptations and disabled grants process to reduce waiting times¹⁸. We consider that ensuring the availability of housing adaptations is essential, not least given the emphasis within government policy - particularly Transforming Your Care - on the delivery of social care within the home.

- 3.6 We recommend that support for adaptations should be available across tenures, and easy to access - in terms of using the service, speed of delivery, and cost. We welcome the NIHE's 2018 commitment to '*streamline the adaptations and disabled grants processes to reduce waiting times for housing adaptations...*'¹⁹.

- 3.7 We also recommend that action is taken to reduce waiting times for occupational therapy assessments in support of requests for housing adaptations.

Extend the Disability Discrimination Act to include reasonable adjustments to communal areas in residential properties.

- 3.8 Currently under the disability discrimination legislation, landlords and managers of rented residential premises must make reasonable adjustments to the disabled person's home. In addition, they cannot unreasonably refuse permission for disability-related alterations to be carried out. Landlords however are not required to make disability-related alterations to the physical features of the common parts of let residential premises, such as stairs and hallways; even if they are reasonable to make and paid for by a disabled tenant.

17 Letter correspondence (20 July 2018), NIHE to ECNI

18 NI Executive (2017) [PfG Delivery Plan indicators 8 and 48](#)

19 NIHE (2018) [Corporate Plan 2017/18 - 2020/21](#)

- 3.9 We recommend²⁰ that the disability discrimination legislation is extended to require landlords to make disability-related alterations to the physical features of the common parts of residential properties, such as stairs and hallways.

Ensure access to adequate, sustainable and long-term independent living provision for all people with disabilities for whom it is a viable housing option.

- 3.10 Article 19 (the right to live independently) of the UN Convention on the Rights of Persons with Disabilities²¹ makes clear that disabled people have the right to determine how to live their own lives, particularly with respect to personal decisions regarding their living arrangements, including with respect to personal care and support. We welcomed the 2017 draft PfG delivery plan²² acknowledgement of the need for cross cutting actions, including improving independent living and the provision of suitable homes for people with disabilities.
- 3.11 We recognise the importance of the Supporting People programme in supporting individuals to live independently. A 2016 action plan²³ identified 13 recommendations following a review of the programme²⁴. We urge their prompt implementation, particularly as regards how they address the barriers to independent living as set out above.
- 3.12 We note that proposals for changes to the adult social care system are still awaited²⁵. We reiterate our recommendation²⁶ to the 2013 consultation on the future of adult social care, that *‘any new 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’*. We also reiterate the importance of ensuring that any transition to the mixed economy model of private and community / voluntary care providers will 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.

20 ECNI (2012) [Strengthening Protection for Disabled People](#)

21 [UN Convention on the Rights of Persons with Disabilities](#)

22 NI Executive (2017) [PfG Delivery Plan indicator 42](#)

23 DSD (2016) [Action plan for the implementation of the Supporting People review](#)

24 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](#)

25 [Department of Health website, accessed 25.01.19](#)

26 ECNI (2013) [Response to Who Cares? The future of adult social care and support in Northern Ireland](#)

Further advance energy efficiency and expand oil buying clubs across all tenures.

- 3.13 While progress has been made, including improvements in energy efficiency through the Affordable Warmth Scheme and the requirements of an Energy Performance Certificate²⁷, addressing fuel poverty should remain a priority for action, as highlighted in the Active Ageing Strategy 2016 – 2021.
- 3.14 In addition to further advancing energy efficiency oil buying clubs, open to all tenures, should be promoted and expanded to allow the group purchase of fuel at more competitive rates than is possible by individual households.

Ensure the availability of suitable accommodation and services for homeless single males; younger and older people; and refugees and unsuccessful asylum seekers.

- 3.15 We note the multi-faceted nature of homelessness, including for those who are vulnerable and/or with complex needs²⁸. In light of the prevalence of complex needs, the provision of support services is a crucial factor.
- 3.16 We welcome the ongoing work by the NIHE and others in this regard, and recommend it focuses on the specific needs of individuals from across the equality categories. This should include with regard to those placed in private sector accommodation, for whom the support services (which social housing and hostel accommodation can provide) may not be available.

Single males

- 3.17 Single male reference person households continue to be more likely than single female reference person households to present as homeless to the Northern Ireland Housing Executive (NIHE)²⁹.
- 3.18 Due to the pressures on social housing, and a relative lack of one-bedroom properties in Northern Ireland, males, if accepted as homeless, are likely to be housed in temporary hostel accommodation on a longer-term basis, which may not be appropriate. We recommend action to ensure the provision of accommodation appropriate to the needs of this group, providing appropriate support as required.

27 From 2008 all properties, including new builds and properties for sale, are required to hold an Energy Performance Certificate. The EU Performance of Buildings Directive (Part F) has been introduced in stages into NI building requirements.

28 Agenda NI (2014) [Homelessness in Northern Ireland](#), April edition

29 DfC (2017) [Northern Ireland Housing Statistics 2016-17, Section 3 tables, social renting sector](#). Single males made up 33%, and single females 18% of homeless presentations

Young people

3.19 Young people (aged under 35) entitled to the housing element of Universal Credit have been negatively affected by Welfare Reform measures, as regards their ability to secure and sustain private rented sector accommodation, in the absence of available social housing. We continue³⁰ to call for a review of the impact of Welfare Reform measures on this age group. This impact is manifested in pressures on meeting the shortfall between benefits and rent.

Older people

3.20 Although people aged 60 and over account for only 10% of homeless presentations³¹, 74% of acceptances³² within this group are due to current accommodation being unreasonable. This trend is increasing over time³³. The NIHE attributes this to, among other things, our ageing population and instances of complex needs such as disability³⁴. Our consideration of housing grants and adaptation services elsewhere in this paper sets out recommendations as regards physical accessibility. It recommends the provision of easy to access and affordable adaptation services across all tenures.

Refugees and unsuccessful asylum seekers

3.21 Particular issues arise for individuals from minority ethnic groups (MEG) who are resident in Northern Ireland as refugees and asylum seekers. While those who have been unsuccessful in their asylum application have no right to any accommodation support, refugees do have entitlement. We recommend the provision of appropriate culturally sensitive accommodation for those groups eligible for services. For those currently ineligible, we recommend the provision of suitable emergency accommodation. We note the scheme being provided by Choice, PPR and others³⁵ which uses privately held housing stock and services from the other partners to provide accommodation and support services to destitute unsuccessful asylum seekers.

30 ECNI (2017) [Age Equality - Priorities and Recommendations](#)

31 DfC (2017) [Northern Ireland Housing Statistics 2016-17, Section 3 tables, social renting sector](#)

32 Data provided by DfC July 2018

33 NIHE (2017) [Homelessness Strategy for Northern Ireland 2017-2022, at page 31](#)

34 NIHE (2017) [Homelessness Strategy for Northern Ireland 2017-2022](#)

35 Housing for All, Community Foundation and East Belfast Mission

4 Address the specific housing needs of particular equality groups

Address the longer waiting-list times for social housing experienced by households with a Catholic religion household reference person.

- 4.1 We reiterate the importance of ensuring that housing need is met on the basis of objectively assessed need. Where stock availability (supply-side factors) differs from individual housing needs and preferences (demand-side factors), longer waiting lists can ensue. In Northern Ireland, this has a particular impact on households with a Catholic religion household reference person³⁶.
- 4.2 Analysis of access to social housing in Northern Ireland should take into account a range of factors which shape supply and demand. For example, generally applicable issues of residential preferences, personal safety, particular housing needs, and the availability of appropriate housing stock and/or development land in specific areas must also be considered in the context of segregated residential patterns in Northern Ireland.
- 4.3 On the supply-side, we recommend action to consider for example, how appropriate stock and land for development can be made available to ensure that objectively assessed housing need is more effectively met in areas of high demand. On the demand-side, steps which might both widen areas of preference for those in housing need and sharing more generally could serve to expand housing markets and increase opportunities to both meet objectively assessed housing need and advance increased sharing. We also recommend joint working, including with those working and living within communities, so as to further build trust and confidence between divided communities.

³⁶ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#).

Ensure that the accommodation needs of Travellers are met, in consultation with the Traveller community.

- 4.4 While some progress has been made, access to appropriate accommodation to meet the needs of Irish Travellers remains limited. The Commission continues to advocate the need for an adequate programme of accommodation to meet the cultural needs of the Irish Traveller community and remains concerned by the lack of progress in securing planning permission for sites in the areas identified as most in need in the NIHE Traveller Accommodation Needs Assessment³⁷. It concluded that *'net housing need is ... a much more complex calculation ... and will be undertaken by Strategic Partnerships in consultation with the Traveller community'*. We welcome the commitment to ensure the involvement of the Traveller community, and to take specific steps to assess Traveller need.
- 4.5 The Traveller Accommodation Needs Assessment also indicated that around one-fifth to one-third³⁸ of all Irish Traveller households still travel. It therefore remains important that the provision of accommodation is such that it continues to cater for those who wish to have a nomadic lifestyle. Indeed, as noted in Wallace, for some Irish Travellers, 'bricks and mortar' accommodation may be inappropriate where it does not accord with their nomadic lifestyle³⁹.
- 4.6 Furthermore, there is a lack of recent research with regard to the general levels of adequacy of specific types of sites - including for those beyond the management of the NIHE. Consideration should therefore be given to the extent to which issues persist, and if so, any prevalence within certain types of accommodation and/or tenures.
- 4.7 We note that the NIHE is undertaking a further Traveller Accommodation Needs Assessment, and we look forward to its implementation and outworking giving effect to our recommendation. We welcome that the assessment will seek respondents' views on their awareness of the accommodation choices available to them.

37 NIHE (2015) [Traveller Accommodation Needs Assessment 2014](#)

38 In 2014, 18% (n=69, N=384) of Traveller households travelled. In 2002 - 20% (n=62, N=316) and in 2008 - 29% (n=130, N=449) of respondents said that they travelled. See: NIHE Travellers Accommodation Needs Assessments (2002; 2008; 2015).

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

Ensure greater awareness of the rights, responsibilities and housing options relevant to minority ethnic groups.

- 4.8 Research suggests there is potentially limited awareness of rights and/or limited accommodation choices available to migrants and minority ethnic groups. Furthermore, these groups may lack a wider network of family and friends with knowledge of the Northern Ireland housing market, which would enable them to make better informed choices. Our *Statement on Key Inequalities in Housing and Communities* noted that migrant workers were often at risk of being subject to ‘tied accommodation’ with poor conditions and overcrowding. Greater awareness of rights and the market could act to empower potential tenants to explore the full range of options open to them.
- 4.9 Such information should be provided in methods and formats accessible to the identified audience both in terms of language and dissemination channels. We further recommend that frontline staff (including those from the NIHE, Housing Associations and advice centres) are trained on the entitlements of EU and other migrants to benefits and more broadly on the rights and responsibilities of refugees and asylum seekers. We also reiterate our recommendation that government should take account of the need to provide support and advice to asylum seekers as regards emergency and subsequent accommodation.

Ensure that older people of differing sexual orientations and transgender people have their domiciliary, residential or nursing care needs fully met.

- 4.10 Older lesbian, gay and bisexual (LGB) and transgender people can have different family support networks to the wider population and thus potentially differing needs for domiciliary, residential or nursing care support when compared to heterosexuals. In addition, older LGB and transgender people’s experience of growing up in Northern Ireland may make them more reluctant⁴⁰ than others to disclose their sexual orientation, sex, gender or medical history.
- 4.11 To better meet these needs, healthcare workers providing domiciliary, residential or nursing care, should receive specific training in the provision of intimate care for these groups and in the needs and sensitivities of LGB and transgender people. Further any decisions on care plans and in the sharing of information between medical facilities and/or care providers should include the full involvement of the care recipient.

⁴⁰ For example - only 14% of older people had been open to healthcare providers about their sexuality. Heaphy et al (2003), referred to in Equality and Human Rights Commission (2010) [Don't look back? Improving health and social care service delivery for older LGB users](#)

Trusts should ensure there is sufficient capacity to care for permanent care home residents (where they wish it), and that they provide for all older residents requiring care and support.

- 4.12 Should the Department of Health's⁴¹ plans proceed to reduce residential accommodation for older people⁴² it will be vital that older residents are assured that they will receive the same level of care and support in alternative accommodation.
- 4.13 If the plans proceed, we also recommend the mandatory inclusion of an assessment of the quality and services available in alternative care options. Compliance with the best practice guide *'The Reconfiguration of Statutory Residential Homes'*⁴³ on the role of advocacy and the importance of infrastructure is recommended.

Understand the accommodation needs, preferences and expectations of older people.

- 4.14 The demographic trend of an ageing population is contributing to an increase in demand for support services and specialised housing in old age⁴⁴. However it is also the case that sheltered housing has become less attractive to fit, active older people⁴⁵.
- 4.15 Research into housing needs and preferences, and geographical patterns of need may assist the Northern Ireland Housing Executive; Housing Associations; and the nine councils in assessing the demand and supply needs for future social housing. The NIHE has advised that it is undertaking research to this effect.⁴⁶ We welcome this development and look forward to its publication and implementation of findings.

41 Role of lead department moved from Department of Health, Social Services and Public Safety to Department of Health (DoH) in May 2016

42 DHSSPS [Transforming Your Care: A review of health and social care in Northern Ireland](#)

43 Health and Social Care Board (Nov 2013) [Making Choices: Meeting the current and future accommodation needs of older people – Good Practice Guide – Reconfiguration of Statutory Homes, November 2013](#)

44 Northern Ireland Housing Executive (Aug 2008) Older People Housing Policy Review Action Plan 2008 – 2010

45 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

46 Email from NIHE, 07.02.19

5 Mitigate the long-term negative impacts of Welfare Reform

Ensure that the mitigation of negative impacts of Welfare Reform continues on a long-term basis.

- 5.1 While noting the mitigations package put in place in Northern Ireland to cushion the implications of the Welfare Reform measures, and concessions around payments, the Commission is concerned at the long-term implications of the measures on a number of equality groups. We are concerned that the implications of the measures are of a temporary nature ranging from one year (e.g. mitigation for those who lose out as a result of the transfer from DLA to PIP) to four years (e.g. spare room subsidy/ bedroom tax)⁴⁷.
- 5.2 In 2015 the United Nations published findings of its Inquiry⁴⁸ which highlighted the disproportionate and adverse impact of Welfare Reforms on disabled people across the UK, including with regard to financial hardship: rent arrears, debts, evictions and cuts to essentials such as housing and food.
- 5.3 The Commission continues to urge implementation of long-term mitigation measures to ensure that vulnerable groups are protected from the adverse impact of Welfare Reform.

Address the needs of single tenants / prospective tenants aged 35 years and under when renting in the private rented sector.

- 5.4 Single people aged 35 year old and under are entitled only to a shared accommodation rate of the housing element of Universal Credit. This is lower than the full rate. Research to date has been of small scale but found that since the changes came into force around one in ten landlords no longer rent to under 35-year olds single people⁴⁹.

47 See [UN Inquiry into the Rights of Disabled People in the UK](#) and Letter from [UKIM to DWP Minister Penny Mordaunt dated 1st December 2016](#) [UN Inquiry into the Rights of Disabled People](#)

48 UN (2016) [UN Inquiry into the Rights of Disabled People in the UK](#)

49 Centre for Regional Economic and Social Research, Sheffield Hallam University funded by the Department for Social Development (Mar 2014) [Monitoring the impact of recent measures affecting Housing Benefit and Local Housing Allowances in the private rented sector in Northern Ireland: Final Report](#)

- 5.5 Furthermore, over one third of landlords participating in that research stated that they might cease letting to Local Housing Allowance single tenants under the age of 35. The Commission continues to recommend the introduction of comprehensive legislation to make unlawful any unjustified age discrimination in the provision of goods and services - including in the provision of accommodation.
- 5.6 In 2015/16 the Department consulted on a discussion document on a review of the role and regulation of the private rented sector⁵⁰. It subsequently consulted⁵¹ on proposals for change. It included proposals around rent increases permissible, giving housing associations a role in the private rented sector and improving information provision requirements. We welcome the commitment within the draft PfG delivery plan⁵² to develop affordable housing solutions to meet the needs of single people aged under 35 on benefits, and look forward to the prompt implementation of related actions.

Tackle the barriers which the 'digital by default' and telephone advice system of benefits may present to those within some Section 75 categories.

- 5.7 With the provision of government services moving increasingly to 'digital by default' (whereby information provided and accessed by individuals is online), safeguards are necessary to ensure that those within Section 75 groups receive their full entitlement to benefits.
- 5.8 Particular issues may arise for those who do not have access to the internet, or who may require assistance to provide the range of information required.
- 5.9 Furthermore, the Office for National Statistics (ONS) has reported (2018) that the reliance upon online and telephone contact with government benefits staff rather than face to face contact has been found to be problematic for some claimants⁵³.

50 DSD (2015) [Review of the Role and Regulation of the Private Rented Sector in Northern Ireland - discussion document](#)

51 DfC (2016) [Private Rented Sector in Northern Ireland – Proposals for Change](#)

52 NI Executive (2017) [PfG Delivery Plan indicators 8 and 48](#)

53 CAB (2017) [We need to fix Universal Credit](#)

6 Improve equality data collection and analysis

Address key equality data gaps across a number of areas of public policy.

- 6.1 Comprehensive equality data is necessary to shape, refine and evaluate the impact of strategies, programmes and policies. There remained significant data gaps across a number of areas and themes⁵⁴, specifically: gender identity; religion; political opinion; and sexual orientation. We reiterate our recommendation that government should ensure, including via Programme for Government outcomes and indicators, that it tracks outcomes both in aggregate, and across the full range of Section 75 equality categories.
- 6.2 With regards to draft PfG delivery plans (December 2016) we restate our view that the indicator ‘number of households in housing stress’ should collect data and also report progress by Section 75 category. 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.

Ensure data is sufficiently disaggregated to allow for meaningful equality analysis, to better inform public policy intervention.

- 6.3 In housing, there is a lack of data disaggregation⁵⁵ in relation to: ethnicity; disability status; marital status; and, dependency status. For example, key housing datasets offer limited detail with regard to data on minority ethnic groups and migrants.
- 6.4 Instead, any analysis must often rely on small scale surveys and qualitative data.
- 6.5 These shortfalls limit the ability to draw robust conclusions about inequalities, and/or progress in addressing the same, across the full range of equality categories and groups.

54 Data gaps were identified regarding gender identity; religion; political opinion; and sexual orientation. Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#).

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

7 Conclusion

Priority areas for intervention

7.1 The Commission considers, following engagement with stakeholders and wider analysis, that there are immediate opportunities and/or a particular pressing need to secure change in relation to:

- advancing sharing in housing while ensuring objectively assessed need is met,
- addressing the longer social housing waiting list for Catholic households,
- improving the provision of disability related accommodation; and
- tackling the under-reporting of hate incidents and crimes and increase outcome rates.

Overarching areas for action

7.2 While the Commission will work to encourage prompt action to address the above, we also recommend action by government, officials and key stakeholders to advance our full range of recommendations, with a particular focus on tackling the inequalities identified in our 2017 *Statement on Key Inequalities in Housing and Communities*⁵⁶.

7.3 The Commission calls for targeted action across the following overarching areas to address key inequalities, and advance equality of opportunity and good relations:

- **Develop shared, safe communities based on equality, dignity and respect.**
- **Ensure that everyone has access to a sustainable, secure home and enjoys the right to independent living.**
- **Address the specific housing needs of particular equality groups.**

7.4 We also call for action across two additional cross-cutting areas

- **Mitigate the long-term negative impacts of Welfare Reform.**
- **Improve equality data collection and analysis.**

56 ECNI (2017) [Statement on Key Inequalities in Housing and Communities in Northern Ireland](#)



For further information visit: www.equalityni.org/HousingPolicy

FEBRUARY 2019