

Equality Commission

FOR NORTHERN IRELAND



Equality in Housing and Communities

Policy Recommendations

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1 Executive summary

- 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 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 policy position paper sets out the Commission's recommendations and specific priorities for action, as well as the supporting rationale underpinning our recommendations.
- 1.5 It is intended that these recommendations, in tandem with our *Statement on Key Inequalities*, will both support and challenge government and key partners to address key inequalities in housing and communities through the development and delivery of legislation, policy and services over the coming period.

Priority areas for intervention

- 1.6 The Commission considers, following engagement with stakeholders and wider consideration, 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.

1.7 Accordingly, over the coming period, we will seek to focus our attention on working with stakeholders to support and challenge government to secure change in these areas.

Overarching areas for action

1.8 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 towards tackling the inequalities identified in our 2017 Statement on Key Inequalities in Housing and Communities¹.

1.9 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.**

1.10 We also call for action across two additional cross-cutting priority areas:

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

1.11 These overarching areas form a framework for a number of specific recommendations that are listed below and developed further in the main body of this document.

Commission recommendations for changes to law, public policy and service delivery

1.12 Aligned to the five overarching areas set out above, the following are our specific recommendations for action.

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

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

- advance sharing in housing, while ensuring that objectively assessed housing need is met.
- implement specific long-term measures to eliminate discrimination and intimidation, tackle prejudicial attitudes and promote values of acceptance and respect for difference.
- further tackle the under-reporting of hate incidents and crimes (against persons and dwellings), and increase outcome rates.
- address the fear of crime among older people.

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.
- provide information regarding the availability of accessible accommodation.
- ensure the provision of easy to access and affordable adaptation services across all tenures – including by streamlining existing processes and reducing waiting times.
- extend the Disability Discrimination Act to include reasonable adjustments to communal areas in residential properties.
- ensure access to adequate, sustainable and long-term independent living provision, for all people with disabilities for whom it is a viable housing option.
- further advance energy efficiency and expand oil buying clubs across tenures.
- ensure the availability of suitable accommodation and services for homeless single males; younger and older people; and refugees and unsuccessful asylum seekers.

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

- ensure greater awareness of the rights, responsibilities and housing options relevant to minority ethnic groups.
- ensure that older people of differing sexual orientations and transgender people have their domiciliary, residential or nursing care needs fully met.
- Trusts should ensure there is sufficient capacity to care for permanent care home residents (where they wish it), and provide for all older residents requiring care and support.
- understand the accommodation needs, preferences and expectations of older people.

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.
- address the needs of single tenants / prospective tenants aged 35 years and under when renting in the private rented sector.
- tackle the barriers which the 'digital by default' and telephone advice system of benefits may present to those within some Section 75 categories.

Improve equality data collection and analysis

- address key equality data gaps across a number of areas of public policy.
- ensure data is sufficiently disaggregated to allow for meaningful equality analysis, to better inform public policy intervention.

2 Background and context

Advancing equality in housing and communities

- 2.1 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.
- 2.2 Housing requirements are unlikely to be the same for all people across all equality groups and so the steps needed to ensure an accessible, adequate and sustainable home may differ for one person or family to another, depending upon a number of factors, including their equality characteristics or identities.
- 2.3 In Northern Ireland, some households experience severe housing need, deprivation, homelessness and inadequate housing. Further, the full impact of the Welfare Reform programme has not yet been felt in Northern Ireland, as a result in part of time-bound mitigations and the concessions that are being put in place.
- 2.4 Action is required both to address key inequalities and to mitigate any adverse effects of Welfare Reform that in the longer term could serve to create or increase inequality across protected grounds. Whilst socio-economic disadvantage is not a specified ground under the equality legislation, it is clear that the barriers and inequalities experienced by equality groups can be exacerbated by poverty and social exclusion. The Commission continues to proactively highlight the link between poverty and social exclusion, and the inequalities faced by individuals protected under the equality legislation and stresses the need for urgent action to address poverty and social exclusion experienced by individuals across the range of equality categories.

Commission work to advance equality in housing and communities

- 2.5 The Commission has a long history of seeking to advance equality of opportunity and good relations in housing and communities. For example, in 2007 the Equality Commission published its *Statement on Key Inequalities in Northern Ireland*² which included a number of inequalities relating to housing and communities. Since then the Commission has continued to champion actions to tackle key

² ECNI (2007) [Statement on Key Inequalities in Northern Ireland](#)

inequalities and to advance equality outcomes - as part of its work to advance equality of opportunity and good relations in Northern Ireland.

- 2.6 In January 2016 our Recommendations for the Programme for Government (PfG) and Budget³ called for action to:
- develop safe, shared communities based on equality, dignity and respect
 - 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
 - address the housing needs of particular equality groups, such as Irish Travellers, and minority ethnic communities (including migrant workers and refugees).

- 2.7 We have also called for action to both address data gaps and to provide more disaggregated data. For example, our June 2016 response⁴ to the Executive's consultation on a draft Programme for Government Framework recommended that all relevant⁵ PfG measures (and all relevant indicators and all outcomes) should not only be tracked in aggregate but also tracked for the impact on individuals from each of the Section 75 grounds.

Statement on Key Inequalities in Housing and Communities in Northern Ireland

- 2.8 In June 2017, the Commission published our finalised Statement on Key Inequalities in Housing and Communities⁶.
- 2.9 The *Statement* was developed following extensive dedicated research⁷ and stakeholder engagement and input – including on an earlier draft version of the *Statement*.
- 2.10 The *Statement* identified seven key inequalities:
- Catholic household reference person applicants for social housing continue to experience the longest waiting times.
 - Access to appropriate accommodation for Irish Travellers is limited.

³ECNI (2016) [Recommendations for the Programme for Government \(PfG\) and Budget](#)

⁴ ECNI (2016) [Response to the Executive's consultation on a draft Programme for Government Framework](#)

⁵ The Commission considers *relevant* measures to be all those that directly relate to individuals

⁶ ECNI (2017) [Statement on Key Inequalities in Housing and Communities in Northern Ireland](#)

⁷ In 2014 the Commission contracted, and in 2015 published, extensive independent research from Alison Wallace of York University, [Housing and Communities' Inequalities in Northern Ireland](#)

- The homes of minority ethnic people and migrant groups may be vulnerable to racial attacks.
- Migrant workers are vulnerable to becoming subject to tied accommodation with poor conditions and overcrowding.
- Those with a learning disability are not always afforded an opportunity to live independently.
- Many people with disabilities live in homes that are not adequate to meet their disability related needs.
- Lesbian, gay and bisexual (LGB) people can feel harassed and unsafe in their own homes and neighbourhoods.

2.11 The Statement also highlighted that there remain significant and specific data gaps - relating to a number of equality categories, specifically gender; gender identity; religion; political opinion; and sexual orientation. Additionally, there is lack of data disaggregation in relation to: ethnicity; disability status; marital status; and dependency status.

2.12 It is the Commission's intention that the Statement, and underlying Wallace⁸ research, will continue to inform the work of the Executive, relevant departments and stakeholders – further assisting them to mainstream equality considerations into the development and review of legislation, public policy and service delivery.

Progress in advancing equality and good relations in housing and communities

2.13 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.

2.14 Whilst we both recognise and welcome this work, it is clear that challenges remain. These include the extent of housing stress within the growing social housing waiting list; the impacts still to come from Welfare Reform; the current absence of an Executive and Assembly to legislate to regulate the private rental sector, or to implement policies to improve how housing and communities operate for people across the equality grounds in Northern Ireland.

2.15 The Commission is mindful of the complex relationships that exist between housing, communities and other domains. The interplay with labour markets, social security, health, immigration and public

⁸ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#).

attitudes demands a co-ordinated approach to develop long-term multi-faceted and effective policy interventions.

- 2.16 The recommendations set out below will require action not only by government and 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.

3 Priorities and overarching areas for action

Priority areas for intervention

3.1 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.

3.2 These will represent priorities for proactive action by the Commission now and over the coming period. Accordingly, over the coming period, we will seek to focus our attention on working with stakeholders to support and challenge government to secure change in these areas.

3.3 As with all of our work we will continue to seek to engage with government, relevant departments, elected officials and key stakeholders to champion key actions to advance equality.

Overarching areas for action

3.4 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*⁹.

⁹ ECNI (2017) [Statement on Key Inequalities in Housing and Communities in Northern Ireland](#)

3.5 The Commission has identified the following overarching areas where it considers that targeted action could serve 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 home and enjoys the right to independent living;**
- **Address the specific housing needs of particular equality groups.**

3.6 We also set out two additional cross-cutting priority areas for action

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

3.7 The remainder of this document sets out our specific recommendations for action, under each of these five overarching areas listed above. Each recommendation is accompanied by a supporting rationale and key evidence.

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

Summary of recommendations:

- advance sharing in housing, while ensuring that objectively assessed housing need is met
- implement specific long-term measures to eliminate discrimination and intimidation, tackle prejudicial attitudes and promote values of acceptance and respect for difference
- further tackle the under-reporting of hate incidents and crimes (against persons and dwellings), and increase outcome rates
- address the fear of crime among older people

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

- 4.1 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.
- 4.2 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.
- 4.3 We recommend actions designed to incentivise and advance safe, shared housing and communities based on equality, dignity and respect.
- 4.4 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.

- 4.5 As set out in our 2013 Submission to the Panel of Parties (Haass)¹⁰ 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.
- 4.6 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.

Supporting rationale

- 4.7 The Commission views socially, ethnically, politically and religiously integrated housing as a preferred option and long-term goal. We note work such as that which the Northern Ireland Housing Executive (NIHE), with support from housing associations, has undertaken to further shared housing, and reiterate the importance of considering how sharing in housing can be encouraged and incentivised, mindful of the range of factors impacting on residential preferences and decisions.
- 4.8 We therefore welcome the development of shared housing schemes via 'Housing for All'¹¹ and that the target of 200 units per year is on course to be met. We note that a draft Programme for Government (PfG) delivery plan¹² sets out *'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 Start agreement to incentivise the development of more mixed tenure, mixed use sites underpinned by a shared ethos'*¹³.

¹⁰ ECNI (2013) [Submission to the Panel of Parties](#)

¹¹ Housing for All is the branding for the second phase of the TBUC funded Shared Neighbourhood scheme.

¹² NI Executive (2017) [PfG Delivery Plan indicators 8 and 48](#)

¹³ downloaded on: 13 February 2017

- 4.9 It is generally accepted in Northern Ireland that the ‘segregation of communities is common... even where there aren’t any Peace Lines’^{14, 15}. This is further supported by recent 2018 research by the University of Ulster, ‘*Hidden Barriers and Divisive Infrastructure: The case of Belfast*’, which ‘reveals new evidence of a distinctive and important, yet largely unrecognised, body of divisive conflict-era architecture’¹⁶.
- 4.10 Although both Shuttleworth and Lloyd (2013)¹⁷ and Nolan (2014)¹⁸ note that residential segregation has declined since 2001, it remains the case that highly segregated residential housing patterns persist in Northern Ireland. In broad terms, Census 2011 data shows that, similar to 2001, Catholic communities dominate in the west of Northern Ireland and Protestants in the east. Overall, Belfast has experienced an increase in Catholic representation¹⁹ and a decrease in Protestant representation²⁰ since the 2001 Census²¹.
- 4.11 Research suggests that the Northern Ireland population favours sharing over segregation. The 2017 Northern Ireland Life and Times survey results²² found that 78% of respondents had a preference for living in a mixed religion neighbourhood. This figure has fluctuated at between 70 and 80% since 2004.
- 4.12 Further, whilst research indicates that minority ethnic and migrant groups are generally not interested in becoming involved in sectarian conflict in Northern Ireland²³, Shimada (2010) found that they are nonetheless impacted by the challenges of navigating contested space^{24, 25}. Wallace (2015) argues that this has implications with regard to their housing choices and experiences²⁶.

¹⁴ This was the view of 78% of the general public in Northern Ireland in 2012.

¹⁵ Byrne, J., Gormley Heenan, C. and Robinson, G. (2012) [Attitudes to Peace Walls](#)

¹⁶ Coyles, Hamber, Grant (2018) [Hidden Barriers and divisive architecture: the case of Belfast](#), delivered at NI Assembly Knowledge Exchange Seminar Series, June 2018

¹⁷ Shuttleworth, I. and Lloyd, C. (2013) Moving apart or moving together? A snapshot of residential segregation from the 2011 Census.

¹⁸ Nolan, P. (2014) [Northern Ireland Peace Monitoring Report. Number Three](#)

¹⁹ 44.2% in 2001 and 46.0%, respectively.

²⁰ 51.7% in 2001 and 45.1%, respectively.

²¹ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#).

²² ARK (2018) [Northern Ireland Life and Times Survey](#)

²³ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#).

²⁴ Shimada, L.D. (2010) [Transforming Earth and Fire: New Narratives of Identity and Place in Northern Ireland Peace Process](#).

²⁵ Bell, J., Jarman, N. and Harvey, B. (2010) define contested space as a ‘situation where there is tension over access to public space in a largely segregated community’. [Beyond Belfast: Contested Spaces in Urban, Rural and Cross Border Settings](#).

²⁶ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#).

4.13 A 2015 Community Relations Council (CRC) study²⁷ into new residents' experiences of contact in mixed areas of Belfast found that *'mixing was a secondary concern for new residents - it was not the main or even an important reason for the move. They were financial, practical and family reasons'*. As such, any plans to incentivise shared housing and communities should take into account that the attractiveness of any particular *shared* schemes to potential tenants will likely be impacted by factors such as location, amenities and accommodation type, ahead of the desire for living in a mixed neighbourhood.

4.14 Our submission²⁸ to the Panel of Parties in October 2013 (Haass process) recognised the complexity and sensitivity of issues. The Commission noted that it was mindful that we live in a society where, for some, the expression of one's culture is in many ways interpreted as a statement not of inclusion, but of exclusion from the other; a threat and something to fear. We endorsed the commitments in the *Together: Building a United Community* Strategy around building a culture where everyone feels safe and creating a community where all areas are open and accessible to everyone.

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

4.15 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.

4.16 We recommend²⁹ 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.

4.17 We reiterate our recommendations to ensure prompt implementation of existing and awaited equality and good relations strategies through comprehensive, measurable, monitored and evaluated

²⁷ CRC Stevenson (2015) Exploring new residents' experiences of contact in mixed areas of Belfast

²⁸ ECNI (2013) [Submission to the Panel of Parties](#)

²⁹ ECNI (2016) [Programme for Government](#)

action plans. These include the strategies on Race, Sexual Orientation, Disability, Gender and Age.

- 4.18 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 grounds³⁰. 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’*³¹.

Supporting Rationale – Social Attitudes and Hate Crime

- 4.19 While welcoming our 2016 Equality Awareness Survey’s³² overall findings that attitudes towards different equality groups were more positive than in previous surveys, we note that the five most negatively viewed groups were all racial groups³³.
- 4.20 Statistics show that the homes of minority ethnic people and migrant groups may be vulnerable to racial attacks³⁴. For example, Police Service of Northern Ireland statistics³⁵ showed that in the year 2017/18 there were 304 racist motivated crimes of theft and or criminal damage. Although there has been fluctuation (with a trend of increase in racist hate crime incidents between 2010/11 and 2015/16, but broadly a decrease since then) rates are still higher than the 2012/13 level.
- 4.21 Available evidence also suggests that lesbian, gay and bisexual (LGB) people can feel harassed and unsafe in their own homes and neighbourhoods. For example, O’Doherty³⁶ (2009) found that around a fifth of homophobic incidents occurred in the LGB person’s home with nearly a quarter of these incidents involving a perpetrator who was a neighbour or lived locally. PSNI statistics show increases in hate-related ‘theft and criminal damage’ offences during the period 2007/08 to September 2018³⁷.

³⁰ ECNI (2015) [Sharing in Education – summary policy position](#)

³¹ ECNI (2008) [Every Child an Equal Child](#) at page 5

³² ECNI (2018) [Equality Awareness Survey 2016](#)

³³ Travellers (19%), Roma (19%), asylum seekers / refugees (15%), migrant workers (11%) and minority ethnic groups (10%).

³⁴ PSNI (2018) [Hate motivation Annual Trends 2004/05 to 2017/18 \(published 31 October 2018\)](#)

³⁵ PSNI (2018) [Hate Motivation Statistics Bulletin](#)

³⁶ O’Doherty, J. (2009) [Through Our Eyes](#).

³⁷ PSNI (2018) [Hate motivation Annual Trends 2004/05 to 2017/18 \(published 31 October 2018\)](#)

4.22 It was also found that transgender people are at high risk of being the victim of hate crimes, including crimes against the person and property related crimes^{38, 39}.

4.23 We welcome the Criminal Justice Inspectorate's 2017 recommendation⁴⁰ that to provide:

“effective cross-departmental governance in tackling the underlying, enabling factors of hate crime the DoJ should, as soon as possible, directly link its Hate Crime Strategy contained in the Community Safety Strategy to Together: Building United Communities (T:BUC) or any future Northern Ireland Executive Cohesion, Sharing and Integration policy or its equivalent”.

4.24 We note that in the absence of an Assembly, this recommendation has not been progressed.

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

4.25 We welcome the Northern Ireland Policing Board's thematic reviews in relation to transphobic⁴¹ and homophobic⁴², and racist⁴³ hate crime and recommend that actions are taken by the PSNI to ensure the full implementation of outstanding recommendations.

4.26 We recommend detailed follow-up work to track the effectiveness of these actions, including to report on positive progress and/or identify key lessons.

4.27 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.

³⁸ McBride (2013) [Grasping the Nettle: The Experiences of Gender Variant Children and Transgender Youth Living in Northern Ireland](#).

³⁹ PSNI (2018) [Hate motivation Annual Trends 2004/05 to 2017/18 \(published 31 October 2018\)](#)

⁴⁰ Criminal Justice Inspection Northern Ireland (2017) [Hate Crime an Inspection of the Criminal Justice System's response to Hate Crime in N.I.](#), recommendation 3

⁴¹ NIPB (2012) [Thematic Review Policing with and for LGB and Trans people](#)

⁴² NIPB (2012) [Thematic Review Policing with and for LGB and Trans people](#)

⁴³ NIPB (2017) [Thematic Review of Policing Race Hate Crime](#)

Supporting Rationale – under-reporting

- 4.28 Criminal Justice Inspectorate reported (2017) that: *‘Hate incidents are greatly under-reported so the rate of incidents perpetrated against people because they are perceived to be different in some way is much higher’*⁴⁴. Furthermore, the Northern Ireland Policing Board’s 2017 Race Hate Crime Thematic Review noted that any decrease in reported incidents was: *‘not necessarily an indication that hate crime is on the decrease; it may indicate that fewer victims are reporting to the police’*⁴⁵.
- 4.29 Both the Northern Ireland Policing Board and the Police Service of Northern Ireland have recognised the issue of the under-reporting of homophobic hate crimes⁴⁶. In 2010, the Criminal Justice Inspectorate recommended that the *‘PSNI undertake a formal review to identify further methods to address how the reporting system can be further enhanced to minimise under-reporting of hate crime’*⁴⁷.
- 4.30 In 2012, the Northern Ireland Policing Board stated, in relation to policing with and for transgender individuals⁴⁸ that
- ‘The PSNI must equip itself with the information required in order to assess the reason(s) for the increase (in reported hate crime) and consider what further action is required both to increase reporting further and to combat transphobic hate crime’.*
- 4.31 Also in 2012, research contracted by the Equality Commission⁴⁹ noted that findings from surveys of people with disabilities in relation to their experience of hate crime were not reflected in crime statistics *‘highlighting a potential under-reporting of incidences of hate crime’*.
- 4.32 In relation to homophobic hate crime, Through our Eyes (2009)⁵⁰ cited that *‘under-reporting and the responses of some police*

⁴⁴ Criminal Justice Inspection Northern Ireland (2017) [Hate Crime an Inspection of the Criminal Justice System's response to Hate Crime in N.I.](#)

⁴⁵ NIPB (2017) [Thematic Review of Policing Race Hate Crime](#)

⁴⁶ O’Doherty, J. (2009) [Through Our Eyes](#).

⁴⁷ Criminal Justice Inspectorate Northern Ireland (2010) [Hate Crime – A follow up inspection of the management of hate crime by the criminal justice system in Northern Ireland](#)

⁴⁸ NIPB (2012) [Human Rights Thematic Review: Policing with and for LGB and T individuals](#)

⁴⁹ Disability Action (2012) [UNCRRPD Disability policies and programmes – how does Northern Ireland measure up?](#)

⁵⁰ Rainbow Project (2009) [Through our Eyes](#), p151

remained an issue'. The 2013 Grasping the Nettle report⁵¹ also identified under-reporting of transphobic hate crime as an issue.

4.33 A 2015 Policing Board review relating to transgender individuals⁵² noted that a number of steps had been taken by the Police to encourage the reporting of hate crime, including training of police officers and the ability to report incidents online⁵³. The review⁵⁴ further noted that the '*...PSNI must ensure that in practice all personnel are aware of their roles and that they are discharging their responsibilities effectively*'.

4.34 Further, as noted by the Policing Board (2017)⁵⁵:

"While hate crime currently comprises only a small proportion of the cases dealt with by a police officer (recognising however significant under-reporting), unless equipped to recognise those cases and respond appropriately, it is likely that when such cases do arise, the aggravating feature will not be recognised. If hate crimes are not recognised or not properly addressed by the criminal justice system, both the victim and the wider community may lose confidence in the justice process".

4.35 We note and welcome work undertaken by the Northern Ireland Housing Executive to prevent hate crime and support those who have been subjected to it. This includes the Community Safety Strategy⁵⁶; publication of a Hate Harassment Toolkit⁵⁷ which provides guidance and signposting; Supporting Tenancies for People from Ethnic Minorities (STEM) which supports those from ethnic minorities at risk of hate crime and aims to strengthen positive community actions; and the Hate Incident Practical Action scheme which provides support to victims of hate crime across all tenures.

Supporting Rationale – Outcome rates

4.36 Hate crime has repercussions on all areas of the victim's life. It is essential that such incidents are identified and dealt with effectively.

⁵¹ ICR (2013) [Grasping the Nettle: The Experiences of Gender Variant Children and Transgender Youth Living in Northern Ireland](#)

⁵² NIPB (2015) [Human Rights Thematic Review – Policing with and for Trans Individuals. Update on PSNI implementation of recommendations](#)

⁵³ [PSNI Hate Crime Reporting web page, accessed 20.06.16](#)

⁵⁴ NIPB (2015) [Human Rights Thematic Review – Policing with and for Trans Individuals. Update on PSNI implementation of recommendations](#)

⁵⁵ Northern Ireland Policing Board (2017) [Thematic Review of Policing Race Hate Crime](#)

⁵⁶ NIHE (2015) [Safer Together, Community Safety Strategy 2015-2017](#)

⁵⁷ NIHE (2015) [Hate Harassment Toolkit](#)

This includes providing support to the victim and ensuring action against the perpetrator(s).

- 4.37 Outcome rates for crimes with a hate motivation are consistently lower than those for other recorded crimes⁵⁸. The causes attributed to the lower outcome rate for hate motivated crimes include: difficulties in proving the hate element due to its subjective nature; and the hate element of crimes being dropped by the Public Prosecution Service prior to prosecution, and proceeding on the basis of, for example, a criminal damage or assault case.

Address the fear of crime among older people.

- 4.38 Actions must not only focus on tackling crime but also the perception of the prevalence of crime against older people. While a number of strategies⁵⁹ 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.
- 4.39 We reiterate our 2017 recommendation that the Programme for Government⁶⁰ 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.

Supporting Rationale

- 4.40 While the likelihood of an older person being a victim of crime has remained consistently low⁶¹, in 2018 42% of respondents to a Pensioners Parliament survey stated that they were more fearful of crime than two years ago⁶². We welcome the 2018 update and relaunch of the Department of Justice funded 'Feel Safe' guide⁶³.
- 4.41 Crimes which may be targeted at older people because they are perceived as vulnerable or potentially easy to steal from include

⁵⁸ 2015/16 recorded crime outcome rate was 28.5% (PSNI [Outcomes of Crimes Recorded by the Police in Northern Ireland 2015/16-2017/18 \(published 30.11.18\)](#)). However for those crimes with a hate motivation during 2017/18, the detection rates were: racist 14.9%, homophobic 22.1%, sectarian 12%, disability 4.2%, religious 7.3%, transphobic 23.5%. (statistics from [Incidents and crimes with a hate motivation recorded by the police in NI: quarterly update to 31 March 2018](#) (17.05.18))

⁵⁹ Such as the Community Safety Strategy, 'Building Safer, Shared and Confident Communities 2012-2017 / Policing and Community Safety Partnerships / Active Ageing Strategy 2016-2021

⁶⁰ 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)

⁶¹ PSNI (2018) [Police recorded crime Annual Trends 1998/99 to 2017/18 \(published 31 October 2018\)](#)

⁶² Age Sector Platform (2018) [Almost half of older people more fearful of crime](#)

⁶³ Age Sector Platform (2018) [Feel Safe](#). It includes advice on avoiding scams, the 'Nominated Neighbour Scheme' and 'Quick Check 101'.

financial abuse, theft, muggings, doorstep theft, distraction burglary or rogue traders⁶⁴.

- 4.42 In 2017/18, there were 15 crime victims aged 65 or over per 1000 of that population. This contrasts with 50 crime victims aged 18-64 per 1000 of that population⁶⁵. Crime rates are therefore substantially lower within the older age group.
- 4.43 However, Age NI looked at the wider societal impact of crime on older people and found that 66% of older people who took part in the survey believe fear of crime is the biggest problem facing older people. 22% stated that fear of crime is a barrier to engaging with their communities and 17% feel trapped in their own home⁶⁶.
- 4.44 We welcome the introduction in 2015 of a 'nominated neighbour' scheme⁶⁷ by the Police Service of Northern Ireland in partnership with the Commissioner for Older People in Northern Ireland (COPNI)⁶⁸. We also welcome the launch of Quick Check 101, which allows the identity of energy / water network callers to be verified by phoning the 101 police non-emergency number.

⁶⁴ Crown Prosecution Service (undated) [Crimes against older people: CPS Prosecution Policy](#)

⁶⁵ PSNI (2018) [Police recorded crime Annual Trends 1998/99 to 2017/18 \(published 31 October 2018\)](#)

⁶⁶ Age NI Home Safety & Community - [Community Safety](#)

⁶⁷ The purpose of the scheme, introduced in 2015, is for an older person to hand a card instructing an unknown caller to speak to a 'nominated neighbour' who will check the caller's identity

⁶⁸ COPNI (Nov 2015) [Statement on crime against older people](#)

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

Summary of recommendations:

- ensure application of accessible housing standards to all new builds
- provide information regarding the availability of accessible accommodation
- ensure the provision of easy to access and affordable adaptation services across all tenures – including by streamlining existing processes; increasing awareness of grants; and reducing waiting times
- extend the Disability Discrimination Act to include reasonable adjustments to communal areas in residential properties
- ensure access to adequate, sustainable and long-term independent living provision, for all people with disabilities for whom it is a viable housing option
- further advance energy efficiency and expand oil buying clubs across tenures
- ensure the availability of suitable accommodation and services for homeless single males; younger and older people; and refugees and unsuccessful asylum seekers

Ensure application of accessible housing standards to all new builds.

- 5.1 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 homes⁶⁹. Over time, the universal application of accessible standards would significantly reduce the need for formal care services and costly home adaptations in the future⁷⁰.

- 5.2 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’*⁷¹. The 2013 Interdepartmental Review of Housing Adaptations Services⁷² 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’*.

Supporting Rationale – Accessible Homes

- 5.3 While Part R of the Building Regulations - ‘Access and Facilities for Disabled People’⁷³ has applied to all new private sector builds since 2001, providing basic access standards in dwellings, the Building Regulations do not include the ‘Lifetime Homes Standard’ that were adopted for all social housing in 1998.
- 5.4 We note that the benefits of amending Part R to include the lifetime homes standards for privately owned housing could include⁷⁴:
- savings on future adaptations, heating and costs associated with household accidents;
 - delaying moves into residential care;
 - reduced need for temporary residential care; and
 - savings in healthcare and re-housing costs.

Provide information regarding the availability of accessible accommodation.

- 5.5 Accessible housing is most likely to be found within social housing⁷⁵. However, NIHE’s 2012 Audit of Inequalities⁷⁶ notes *‘anecdotal*

⁶⁹ NI Executive (2017) [PfG Delivery Plan indicators 8 and 48](#)

⁷⁰ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#) at page 141

⁷¹ NIHE (2013) [Interdepartmental Review of Housing Adaptation Services](#)

⁷² NIHE (2013) [Interdepartmental Review of Housing Adaptation Services](#)

⁷³ [The Building Regulations \(Northern Ireland\) 2000, Part R](#)

⁷⁴ Northern Ireland Housing Council (2010), [Why the private sector should build to Lifetime Homes standards: A business case by the NIHC](#) as quoted in ECNI (2012) [Response to DSD consultation on the Housing Strategy: Facing the Future](#)

⁷⁵ NISRA (2013) [Census 2011, Table DC4413NI](#)

⁷⁶ NIHE (2012) [Audit of Inequalities](#)

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’.

- 5.6 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 accommodation⁷⁷.

Supporting Rationale

- 5.7 2018 Equality and Human Rights Commission research⁷⁸ into the housing experiences of disabled people in Britain found that *‘Many interviewees were articulate, confident people who had nevertheless faced barriers to accessing information, navigating services and accessing appropriate help and support’*. In 2012, United Kingdom wide research⁷⁹ of young people with disabilities (mostly wheelchair users and people with reduced mobility) found that *‘for many young disabled people, finding rental accommodation that suits their daily living needs can be a major challenge as letting agents are unaware of accessible properties and landlords can be reluctant to adapt their properties to the requirements of a disabled tenant’*.
- 5.8 It further reported that 94% of survey participants said that more web-based information on available accessible properties would improve their experience of looking for accommodation.

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

- 5.9 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 times⁸⁰. 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.

⁷⁷ Letter correspondence (20 July 2018), NIHE to ECNI

⁷⁸ EHRC (2018) [The Housing Experiences of Disabled People in Britain](#)

⁷⁹ Trailblazers (2012) [Locked Out](#)

⁸⁰ NI Executive (2017) [PfG Delivery Plan indicators 8 and 48](#)

5.10 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...'*⁸¹.

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

Supporting Rationale – Improvements to adaptations process

5.12 While welcoming the final report and action plan (2016) of the Interdepartmental Review of Housing Adaptation Services⁸², we note that a number of our recommendations⁸³ to the 2013 consultation remain outstanding. We therefore recommend renewed attention is given by the Joint Housing Adaptations Steering Group to advancing:

- the development of a standard procedure to evaluate and record individual service user journeys in order to inform and shape the development of the new adaptations framework;
- the inclusion in options appraisals of key information on each option; and
- the need to review the ceiling on the Disabled Person's Facilities Grant for private sector housing adaptations.

Supporting Rationale - Reduce waiting times for occupational therapy assessments

5.13 An occupational therapist assessment is required to recommend most housing adaptations. In 2015, Wallace⁸⁴ reported that there were long waits for assessments and notes that the Interdepartmental Review of Housing Adaptation Services⁸⁵ does not stipulate a time-period for assessment.

5.14 Wallace further noted that demand for occupational therapy is anticipated to grow as the population ages, and that *'interviewees*

⁸¹ NIHE (2018) [Corporate Plan 2017/18 - 2020/21](#)

⁸² NIHE (2016) [Final Report and Action Plan, Interdepartmental Review of Housing Adaptation Services](#)

⁸³ ECNI (2016) [Response to the NIHE Final Report and Action Plan, Interdepartmental Review of Housing Adaptation Services](#)

⁸⁴ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#) at page 140

⁸⁵ NIHE (2016) [Final Report and Action Plan, Interdepartmental Review of Housing Adaptation Services](#)

reported that long waiting times for occupational therapy assessments were particularly problematic’.

- 5.15 The 2016 Interdepartmental Review of Housing Adaptation Services action plan⁸⁶ noted that each Health and Social Care Trust would have a dedicated specialist occupational therapist post to provide ‘a point of reference and expertise on housing adaptations for disabled people’ by March 2016.
- 5.16 While we welcome this commitment, we note that it has not yet been implemented⁸⁷. We look forward to its implementation, and to progress reports setting out how it has impacted on waiting times.

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

- 5.17 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.
- 5.18 We recommend⁸⁸ 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.

Supporting Rationale

- 5.19 Our proposals would require landlords to follow a specific process should a tenant with disabilities request an adjustment to a physical feature in a common part of residential premises, where the physical feature puts the tenant at a substantial disadvantage.
- 5.20 The process would include consultation with others affected and, should the landlord agree to the change, that a written agreement be made setting out the landlord and tenant’s rights and responsibilities. The landlord may require the tenant to pay for the cost of making the alteration, though grant assistance may be

⁸⁶ NIHE (2016) [Final Report and Action Plan, Interdepartmental Review of Housing Adaptation Services](#)

⁸⁷ Email correspondence from NIHE (18 July 2018). Final plan is awaiting sign-off.

⁸⁸ ECNI (2012) [Strengthening Protection for Disabled People](#)

available⁸⁹. Where a landlord refuses to make changes the tenant would have legal recourse under an amended Disability Discrimination Act.

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

- 5.21 Article 19 (the right to live independently) of the UN Convention on the Rights of Persons with Disabilities⁹⁰ 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 plan⁹¹ acknowledgement of the need for cross cutting actions, including improving independent living and the provision of suitable homes for people with disabilities.
- 5.22 We recognise the importance of the Supporting People programme in supporting individuals to live independently. A 2016 action plan⁹² identified 13 recommendations following a review of the programme⁹³. We urge their prompt implementation, particularly as regards how they address the barriers to independent living as set out above.
- 5.23 We note that proposals for changes to the adult social care system are still awaited⁹⁴. We reiterate our recommendation⁹⁵ 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.

⁸⁹ Disabled Facilities Grant

⁹⁰ [UN Convention on the Rights of Persons with Disabilities](#)

⁹¹ NI Executive (2017) [PfG Delivery Plan indicator 42](#)

⁹² DSD (2016) [Action plan for the implementation of the Supporting People review](#)

⁹³ 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](#)

⁹⁴ [Department of Health website, accessed 25.01.19](#)

⁹⁵ ECNI (2013) [Response to Who Cares? The future of adult social care and support in Northern Ireland](#)

Supporting Rationale

- 5.24 Research⁹⁶ carried out on behalf of the Equality Commission in 2014 found that *'many people with disabilities in Northern Ireland lack the choice, control and freedom to determine where and with whom they live'*. Article 19 of the UN Convention on the Rights of Persons with Disabilities⁹⁷ identifies that disabled people should have access to a range of in-home, residential and other community support services, including the personal assistance necessary to support living and inclusion in the community, to prevent isolation, or segregation from the community.
- 5.25 The UN Committee on the Rights of Persons with Disabilities recommendations⁹⁸ to the UK Government included:
- Recognition of the right to independent living and being included in the community as a subjective right;
 - Provision of adequate, sufficient and earmarked funding and resourcing; and
 - Development of a plan, developed with disabled people, aim at the deinstitutionalisation of disabled people.
- 5.26 The Department for Social Development's 'Commissioning within Supporting People in Northern Ireland' report⁹⁹ (2015) noted that, as a result of the resettlement programme of people with learning disabilities and mental health issues from long stay hospitals 'other areas of service for people with disabilities are much less well developed and relatively few new schemes for people with physical disabilities have been commissioned since 2012'.
- 5.27 In a 2013 briefing to the All-Party Group on Learning Disabilities, Mencap highlighted a limited supply of supported housing for people with learning disabilities and other complex needs. We note that applicants for social housing with complex needs are to be dealt with through the NIHE Complex Needs Case Management process, rather than within the general need prospectus, and we will be keen to see any future review / evaluation of the impact of this change.
- 5.28 Wallace highlighted¹⁰⁰ concerns about reliance upon family carers to achieve resettlement, specifically in relation to how care needs will be met as these carers age. The then DSD noted that a number of

⁹⁶ 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

⁹⁷ [UN Convention on the Rights of Persons with Disabilities](#)

⁹⁸ UNCRPD (2017) [Concluding Observations on the initial report of the United Kingdom of Great Britain and Northern Ireland](#), paragraph 44(d)

⁹⁹ DSD (2015) [Commissioning within Supporting People in Northern Ireland](#) at paragraph 4.18

¹⁰⁰ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#)

strategic issues had been identified for the first time during the Supporting People Review including¹⁰¹ ‘*evidence emerging of latent demand for housing support from people with learning disabilities living with older carers (usually parents)*’.

- 5.29 Wallace also highlighted¹⁰² a barrier to independent living which younger people with disabilities living in the family home may face. Specifically, where the family home has been adapted to meet the person with disabilities’ needs, they attract few social housing points.

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

- 5.30 While progress has been made, including improvements in energy efficiency through the Affordable Warmth Scheme and the requirements of an Energy Performance Certificate¹⁰³, addressing fuel poverty should remain a priority for action, as highlighted in the Active Ageing Strategy 2016 – 2021.

- 5.31 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.

Supporting Rationale

- 5.32 Progress in tackling fuel poverty is demonstrated in the reduction of fuel poverty levels since 2011. In Northern Ireland in 2011¹⁰⁴ 52% of people aged 60 to 74 years were in fuel poverty, rising to 66% of those aged 75 years and over, compared to 34% of the under 60 age group. By 2016¹⁰⁵, these figures had reduced to 25%, 38% and 15% respectively.

- 5.33 2015 research¹⁰⁶ shows that of older people living in households that are owned outright, 15% were in relative poverty after housing costs. When comparing this to pensioners living in NIHE/Housing

¹⁰¹ DSD (2015) [Commissioning within Supporting People in Northern Ireland](#), at paragraph 4.10

¹⁰² Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#), at page 142

¹⁰³ 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.

¹⁰⁴ Public Health Agency, 2013

¹⁰⁵ NIHE (2018) [House Condition Survey 2016](#)

¹⁰⁶ Department for Social Development (Sept 15) [Households Below Average Income, Northern Ireland, 2013-14](#)

Association dwellings, a similar figure (17%) were likely to be in poverty after housing costs.

- 5.34 The Energy Act 2010 in Great Britain enabled the introduction of 'social tariffs', which have since been replaced by 'warm home discounts'. This scheme, which will run until 2021, offers discounted gas and electricity prices from energy suppliers to vulnerable customers, in particular, those over 60 living in fuel poverty or on a low income¹⁰⁷.
- 5.35 The NIHE, in partnership with Bryson Energy, currently operate oil buying clubs across Northern Ireland. They estimate that participation in the scheme provides around a 10% discount compared to buying as a single customer¹⁰⁸. Home heating oil used in approximately 68% of Northern Ireland homes¹⁰⁹.

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

- 5.36 We note the multi-faceted nature of homelessness, including for those who are vulnerable and/or with complex needs¹¹⁰. In light of the prevalence of complex needs, the provision of support services is a crucial factor.
- 5.37 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

- 5.38 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)¹¹¹.
- 5.39 Due to the pressures on social housing, and a relative lack of one-bedroom properties in Northern Ireland, males, if accepted as

¹⁰⁷ OFGEM (Nov 2011) [Monitoring Suppliers' social programmes 2010-2011](#)

¹⁰⁸ [NIHE website](#) (accessed 31.01.19)

¹⁰⁹ Consumer Council (2018) [Home Energy Index](#)

¹¹⁰ Agenda NI (2014) [Homelessness in Northern Ireland](#), April edition

¹¹¹ 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

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.

Young people

- 5.40 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 continue¹¹² 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

- 5.41 Although people aged 60 and over account for only 10% of homeless presentations¹¹³, 74% of acceptances¹¹⁴ within this group are due to current accommodation being unreasonable. This trend is increasing over time¹¹⁵. The NIHE attributes this to, among other things, our ageing population and instances of complex needs such as disability¹¹⁶. 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

- 5.42 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 others¹¹⁷ which uses privately held housing stock and services from the other partners to provide

¹¹² ECNI (2017) [Age Equality - Priorities and Recommendations](#)

¹¹³ DfC (2017) [Northern Ireland Housing Statistics 2016-17, Section 3 tables, social renting sector](#)

¹¹⁴ Data provided by DfC July 2018

¹¹⁵ NIHE (2017) [Homelessness Strategy for Northern Ireland 2017-2022, at page 31](#)

¹¹⁶ NIHE (2017) [Homelessness Strategy for Northern Ireland 2017-2022](#)

¹¹⁷ Housing for All, Community Foundation and East Belfast Mission

accommodation and support services to destitute unsuccessful asylum seekers.

Supporting Rationale

- 5.43 The Housing (NI) Order 1988, as amended¹¹⁸, defines a person as homeless if they do not have access to accommodation in the United Kingdom. This includes if they have no accommodation in which it is reasonable for them or their family to live in, including as regards affordability. Homelessness therefore embraces many more people than those who are sleeping on the streets. Homelessness, and the threat of it, impacts across the population as a whole, with particular issues for homeless single males; younger and older people; and refugees and unsuccessful asylum seekers.
- 5.44 Hostel accommodation provides temporary shelter and support, but due to pressures on social housing waiting lists, and difficulties accessing and remaining in the private rented sector, obtaining secure, sustainable and appropriate accommodation can be problematic. We note the Northern Ireland Audit Office's (2017) finding that: 'Constrained public finances, the growing number of older household, increasing demand for social housing and welfare reform present significant challenges for both the Department and the NIHE in dealing with homelessness'¹¹⁹. 2018 research into chronic homelessness and temporary accommodation placement in Northern Ireland¹²⁰ found

'The experience of prolonged and cyclical homelessness was described as reducing the potential for tenancy sustainment ... with the institutionalising impact of hostel and shelter accommodation often diminishing independent living skills, eroding support networks, and increasing feelings of isolation at point of move-on'.

- 5.45 The NIHE Homelessness Strategy 2017-2022¹²¹ acknowledges that, as regards the predecessor strategy, *'progress had not always been rapid, including the development of preventative services'*. The current strategy includes among its objectives: prioritising prevention, securing sustainable accommodation and appropriate support solutions and understanding and addressing the complexities of chronic homelessness. We welcome the roll out of Housing Solutions and Support teams, and look forward to publication by the Department for Communities of an

¹¹⁸ At Article 4

¹¹⁹ Northern Ireland Audit Office (2017) [Homelessness in Northern Ireland](#)

¹²⁰ McMordie (2018) [Chronic Homelessness and Temporary Accommodation Placement in NI](#)

¹²¹ NIHE (2017) [Homelessness Strategy for Northern Ireland 2017-2022](#)

interdepartmental action plan to address the non-accommodation issues linked to homelessness¹²². 2018 research¹²³ cited participants' *'strong belief that the development of a Housing First service and recent progress on inter-departmental working is emblematic of sectors' desire and capacity to effect change'*.

- 5.46 Homelessness may be transitional (as a person awaits an accommodation allocation); episodic (repeated periods of homelessness); or chronic (a permanent state of homelessness). The most common reasons given by those presenting as homeless are relationship and family breakdown¹²⁴.
- 5.47 The availability of appropriate accommodation appears to be a key factor. The Homeless Action project's March 2015 research¹²⁵ notes that the *'shortage of available social housing makes it difficult to ensure homeless people are re-housed out of 'temporary' hostel accommodation into an adequate home where they have security of tenure'*. Similarly, 2018 research¹²⁶ in Great Britain found that *'many more people are in private renting who would benefit materially from being in social housing but who have increasingly limited chances to make that change'*.
- 5.48 The NIHE Supporting People service spends around £27.6m of its budget on homelessness services¹²⁷. This includes funding housing related support services that a landlord (such as a housing association for example) or other provider (such as a voluntary organisation) can provide. This may include advice to help sustain a tenancy and floating services such as a warden, or scheme manager.
- 5.49 With regard to ensuring appropriate support, we note the finding of a review of a housing first pilot¹²⁸ that, while not appropriate for everyone, it had played a role in combatting homelessness. The NIHE's Homelessness Strategy commits to develop it further. Housing first provides housing, with support, to vulnerable homeless people, rather than the traditional approach of moving from hostel to supported accommodation and on to independent living. Some caution has however been highlighted by the Simon Community¹²⁹

¹²² such as justice or health.

¹²³ McMordie (2018) [Chronic Homelessness and Temporary Accommodation Placement in NI](#)

¹²⁴ DfC (2017) [Northern Ireland Housing Statistics 2016-17](#)

¹²⁵ PPR and Simon Community (2015) [Ending homelessness - Addressing the Barriers](#), page 5

¹²⁶ Rugg and Rhodes, University of York (2018) [The Evolving Private Rented Sector: Its Contribution and Potential](#)

¹²⁷ NIHE (2018) [Annual Report 2017-18](#)

¹²⁸ North Harbour Consulting (2016) [The efficiency and effectiveness of the housing first support service piloted by de Paul in Belfast, funded by Supporting People: an SROI evaluation](#)

¹²⁹ Agenda NI (2014) [Homelessness in Northern Ireland](#), April edition

which stated *'If appropriate and affordable housing stock was available, a Housing First approach may be a sustainable solution for homeless individuals and families with low or medium support needs. However, a Housing First only approach could serve to disenfranchise and disadvantage the complex needs client group'*. It cited that in a snapshot survey in October 2013, 60% of its clients had complex needs, including for example, mental ill health, learning disabilities and substance abuse.

Single males

- 5.50 For eight consecutive years between 2009/10 and 2017/18, single male reference person households¹³⁰ accounted for around a third of homeless presentations to the NIHE, whilst single female reference person households accounted for less than a fifth¹³¹. The main reasons that single male reference person households gave for presenting as homeless to the NIHE were: as a result of breakdown in sharing or family dispute; relationship breakdown; no accommodation in Northern Ireland; and the loss of rented accommodation. Due to the lack of one-bedroom properties, single homeless people (largely males) are often placed in hostel or other temporary accommodation.

Young people

- 5.51 The shared accommodation rate applying to housing benefit for those aged under 35, came into force in Northern Ireland in January 2012. Northern Ireland research to date has been of small scale, but one¹³² study found that since the changes came into force around one in ten landlords no longer rented to under 35 year old single people¹³³. A 2017 Great Britain survey¹³⁴ of 2000 landlords and letting agents found that two thirds were not willing to let to Housing Benefit / Universal Credit claimants. Particular issues may exist for care leavers, who may be solely responsible for securing and maintaining a tenancy¹³⁵.

¹³⁰ DfC (2018) [Northern Ireland Housing Statistics 2017-18](#); Single male households include those aged 16-59 years old.

¹³¹ DfC (2018) [Northern Ireland Housing Statistics 2017-18](#) Section 3 Tables, Social Renting Sector

¹³² Centre for Economic and Social Research (2014) [Monitoring the Impact of Recent Measures Affecting Local Housing Allowance in the Private Rented Sector in Northern Ireland](#)

¹³³ 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](#)

¹³⁴ RLA Pearl, Pattison (2017) [Access to Homes for Under 35s: The impact of welfare reform on private renting](#)

¹³⁵ Barnardos (2017) [Access All Areas Northern Ireland](#)

5.52 The Homelessness Monitor 2018 England¹³⁶ cited 2014 research noting that the bulk of the reduced entitlement in Great Britain was having to be met by claimants. For almost half, this involved cutting back on other expenditures on household 'essentials' and nearly a third borrowing from family or friends¹³⁷. The 2018 Northern Ireland Homelessness Monitor¹³⁸ provided useful analysis in relation to young people, but was limited with regard to broader Section 75 groups' experiences of homelessness in Northern Ireland. It cited 'an urgent need for better statistical monitoring data on homelessness trends in Northern Ireland. It is expected that the roll-out of Housing Solutions and associated IT improvements will facilitate this'¹³⁹.

5.53 We note approaches such as the NIHE's Private Rented Access Scheme assists individuals into the private rented sector without requiring a large deposit upfront.

Refugees and unsuccessful asylum seekers

5.54 On being recognised as refugees, individuals are required to vacate their Home Office provided accommodation and access other appropriate accommodation within 28 days ('the transition period'). Organisations working closely with refugees, such as Extern, have verbally advised that the 28-day period is very short for anyone to find accommodation. Those who wish to rent privately often have difficulties in finding a guarantor and having just recently been granted refugee status, have no savings to rely on. Furthermore, concerns have been raised about the suitability of provision.

5.55 HAPANI, a charity working with nationals of Somalia and Eritrea living in Northern Ireland, has raised concerns¹⁴⁰ that female refugees have to share with others who have drug and alcohol dependencies. HAPANI also note that those who have been unsuccessful in their asylum applications are deemed 'ineligible service users' and lose the right to such accommodation. Such individuals must depend on charity or friends, and cannot access government-funded schemes.

¹³⁶ Crisis (2016) [The Homelessness Monitor 2016 England](#)

¹³⁷ Beatty, Cole (2014) [Monitoring the Impact of Changes to the Local Housing Allowance System of Housing Benefit: Final reports](#)

¹³⁸ Crisis (2018) [Homelessness Monitor England 2018](#)

¹³⁹ Crisis (2018) [Homelessness Monitor England 2018](#)

¹⁴⁰ Email Correspondence (August 2015) from Horn of Africa People's Aid NI to ECNI

6 Address the specific housing needs of particular equality groups

Summary of recommendations:

- address the longer waiting-list times for social housing experienced by households with a Catholic religion household reference person
- ensure that the accommodation needs of Travellers are met, in consultation with the Traveller community
- ensure greater awareness of the rights, responsibilities and housing options relevant to minority ethnic groups
- ensure that older people of differing sexual orientations and transgender people have their domiciliary, residential or nursing care needs fully met
- ensure there is sufficient capacity to care for permanent care home residents (where they wish it), and provide for all older residents requiring care and support
- understand the accommodation needs, preferences and expectations of older people

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

- 6.1 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 person¹⁴¹.
- 6.2 Analysis of access to social housing in Northern Ireland should take into account a range of factors which shape supply and demand. For

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

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.

- 6.3 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.

Supporting Rationale

- 6.4 Although Northern Ireland saw a decrease in residential segregation, across all sectors, between 2001 and 2011¹⁴² ¹⁴³, the existence of segregated residential housing patterns can have the effect of fragmenting and limiting the operation of wider housing markets, adding complexities whereby a lack of stock (relative to demand) of social housing in sometimes narrowly defined geographical areas may not easily be met by excess supply in other nearby areas.
- 6.5 While the Housing Selection Scheme¹⁴⁴ is focussed on assessing and addressing objective housing need, ranking applications so as to prioritise housing offers to those with the highest assessed objective housing need, it is also the case that across Northern Ireland as a whole, Catholic household reference persons continue to experience the longest waiting times for social housing.
- 6.6 Our 2017 Statement on Key Inequalities in Housing and Communities¹⁴⁵ examined Northern Ireland Housing Executive (NIHE) waiting list time data for social housing for the period 2004 to 2009 and for 2013/14 shows that Catholic household reference person applicants experienced the longest median waiting times for

¹⁴² Shuttleworth, I. and Lloyd, C. (2013) [Moving apart or moving together? A snapshot of residential segregation from the 2011 Census.](#)

¹⁴³ Gray, Hamilton et al (2018) [Northern Ireland Peace Monitoring Report. Number Five](#)

¹⁴⁴ NIHE, [How the Housing Selection Scheme works](#), website.

¹⁴⁵ ECNI (2017) [Statement on Key Inequalities in Housing and Communities](#)

social housing at the point of allocation in Northern Ireland as a whole¹⁴⁶.

- 6.7 The existence of segregated residential housing patterns can have the effect of fragmenting and limiting the operation of wider housing markets. The 2012 NIHE Audit of Inequalities¹⁴⁷ notes that *'while there is freedom of choice for all applicants seeking social housing, people's choices generally take account of the religious or political make-up of the area they seek to live in, although there are some signs this may be changing to a degree through increasing demand for shared housing'*.
- 6.8 Nolan (2013) argued, with specific reference to north Belfast, that although there is a huge demand for additional housing for Catholics in north Belfast, the properties left vacant by Protestants moving out of the general area are not filled by Catholic applicants as the *" 'peace line' is not transgressed"*¹⁴⁸. Wallace¹⁴⁹ notes that *'dual markets operate in close proximity and yet properties may not be substitutable for each other'*.
- 6.9 This echoes the 2004 finding of the Select Committee on Northern Ireland which noted, that when viewing north Belfast as having a Catholic side and a Protestant side, there is *'a recognition that ... there is intense pressure for more housing on the Catholic side'*¹⁵⁰ and the 2012 Participation and the Practice of Rights (PPR) report which calculated that the Protestant side of north Belfast has a surplus of housing, whilst on the Catholic side large deficits in stock are evident¹⁵¹.
- 6.10 We note that the Committee on Economic, Social and Cultural Rights 2016¹⁵² concluding remarks repeat those from 2009¹⁵³. They urge the United Kingdom government to:

"Intensify its efforts to address the challenges to overcoming persistent inequalities in housing for Catholic families in North Belfast, including through meaningful participation by all actors in decision-making processes related to housing"

¹⁴⁶ ECNI (2017) [Statement on Key Inequalities in Housing and Communities](#)

¹⁴⁷ NIHE (2012) Audit of Inequalities, p7

¹⁴⁸ Nolan (2013) [Northern Ireland Peace Monitoring Report, Number Two](#) page 115

¹⁴⁹ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#).

¹⁵⁰ House of Commons Northern Ireland Affairs Committee (2004) [Social Housing Provision in Northern Ireland](#) Sixth Report of 2003-04 Session, Volume 1, HC 493-1, para 21

¹⁵¹ PPR (2012) [Equality Can't Wait the Right to Housing Campaign](#)

¹⁵² ICESCR (2016) [Concluding Observations](#)

¹⁵³ ICESCR (2009) [Concluding Observations](#)

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

- 6.11 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 Assessment¹⁵⁴. 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.
- 6.12 The Traveller Accommodation Needs Assessment also indicated that around one-fifth to one-third¹⁵⁵ 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 lifestyle¹⁵⁶.
- 6.13 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.
- 6.14 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.

¹⁵⁴ NIHE (2015) [Traveller Accommodation Needs Assessment 2014](#)

¹⁵⁵ 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).

¹⁵⁶ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#).

Supporting Rationale

- 6.15 We note the Northern Ireland Human Rights Commission's 2018 observation¹⁵⁷ that:

“The inexorable impact of public policy has been to leave many Travellers with an unpalatable choice of retaining their culture while living in poor housing conditions or move into social housing. While for some Travellers social housing is their choice of accommodation, for others it is not.”

- 6.16 That report also observed that Belfast City Council is the only Northern Ireland council that expressly commits to ensuring *‘the need for Traveller specific accommodation will be addressed through the local development plan, by protecting existing Traveller facilities and providing a criteria-based policy for assessing future proposals of suitable facilities’*.
- 6.17 We note that as part of the Traveller Accommodation Programme 2015-2018 maintenance work was carried out to sites in West Belfast, Londonderry and Craigavon. However, we remain concerned by the length of time it takes to realise plans for sites and the impact this may be having on Traveller culture and way of life.
- 6.18 Our Statement on Key Inequalities in Housing and Communities¹⁵⁸ analysed data from the NIHE with regard to the number of planning applications the NIHE made for Traveller sites during 2007 to 2015. It showed that, of eight planning applications lodged within the time period: three were granted permission^{159, 160}; two were refused permission, one of which had previously been granted¹⁶¹; the land was withdrawn by the owner for two applications; and, the Department for Social Development asked the NIHE to withdraw one application¹⁶².
- 6.19 Further, whilst the NIHE Traveller Needs Assessment identified three council areas in 2014 that presented the most need for Traveller accommodation (Belfast¹⁶³; Dungannon¹⁶⁴; and,

¹⁵⁷ NIHRC (2018) [Out of Sight, Out of Mind, Travellers' Accommodation in Northern Ireland](#)

¹⁵⁸ ECNI (2017) [Statement on Key Inequalities in Housing and Communities](#)

¹⁵⁹ Of the three: one was a site extension made in 2008; one was for 12 new pitched service sites made in 2011; and, a further application to extend a site was also made in 2011.

¹⁶⁰ All three applications were in the Armagh City, Banbridge and Craigavon Borough Council area.

¹⁶¹ The NIHE advises that it has appealed the application that was at first accepted, then later withdrawn; this appeal is pending at the time of publication.

¹⁶² Email Correspondence (24 August 2016) from NIHE to ECNI.

¹⁶³ Now the Belfast District Council areas.

¹⁶⁴ Now the Mid Ulster District Council areas.

Craigavon¹⁶⁵) the planning data supplied by the NIHE shows that, of the eight applications, none were in the Belfast or Dungannon council areas. A total of six of the eight applications (75%) were however in one of the areas of most need - the Craigavon area¹⁶⁶,
¹⁶⁷.

- 6.20 With regards to the adequacy of provision, the 2014 Traveller Accommodation Needs Assessment 2014 found that around one quarter of respondents reported that they were either dissatisfied or very dissatisfied with their current accommodation (down however from almost two-fifths in 2008)¹⁶⁸.
- 6.21 The 2010 All Ireland Traveller Health Study¹⁶⁹ reported poor housing conditions for Irish Travellers on sites. It found that nearly a quarter of Irish Travellers in Northern Ireland lived in a trailer, mobile home, caravan or chalet. Of these, nearly a third did not have running water and nearly a fifth never had their rubbish collected¹⁷⁰. In 2017, the NIHE confirmed¹⁷¹ that all sites under its management have individual electricity supplies, running water and waste removal provision.

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

- 6.22 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

¹⁶⁵ The Craigavon area is now part of the Armagh City, Banbridge and Craigavon Borough Council.

¹⁶⁶ The other two applications were in: Antrim and Newtownabbey Borough Council; and, Newry, Mourne and Down District Council.

¹⁶⁷ NIHE (2015) [Traveller Accommodation Needs Assessment 2014](#).

¹⁶⁸ In the 2008 Assessment 37% (166 out of 449 respondents) of respondents were either 'dissatisfied' or 'very dissatisfied' with their current accommodation, this was compared to 23% (87 out of 384 respondents) in 2014.

¹⁶⁹ Abdella, S. (with 24 others) (2010) [Our Geels: All Ireland Traveller Health Study. Technical Report 1: Health Survey Findings](#).

¹⁷⁰ Abdella, S. (with 24 others) (2010) [Our Geels: All Ireland Traveller Health Study. Technical Report 1: Health Survey Findings](#).

¹⁷¹ NIHE (February 2017) Written Correspondence – NIHE to ECNI, as quoted in ECNI (2017) Statement on Key Inequalities in Housing and Communities.

to empower potential tenants to explore the full range of options open to them.

- 6.23 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.

Supporting Rationale – Rights and Responsibilities

- 6.24 Migrant workers may not be in a financial position to buy their own property or obtain a mortgage, and social housing may not be an immediate option due to waiting lists and other restrictions. The private rented sector is therefore where many¹⁷² minority ethnic groups, particularly migrant workers, seek accommodation.
- 6.25 Local studies¹⁷³ have shown that *‘...the private rented sector in Northern Ireland has largely grown to meet the increased demand from inward migration over the last decade, suggesting that minority ethnic groups have relatively easy access to this sector of the housing market’*.
- 6.26 While suiting some, the private rented sector lacks security of tenure relative to other tenures. Wallace¹⁷⁴ reported that *‘poor quality and management is a concern for families or other households with vulnerable members’*. 2013 research¹⁷⁵ also reported that *‘There are also some indications that some private landlords in Northern Ireland impose different conditions on minority ethnic groups, which can constrain access if they have no deposit or guarantor’*.
- 6.27 In 2013 a further issue was highlighted by a Housing Rights Service mystery shopper exercise on upfront fees in the private rented sector¹⁷⁶. It reported evidence of a lack of consistency and

¹⁷² NISRA (2013) [Census 2011: Detailed Characteristics for Northern Ireland on Ethnicity, Country of Birth and Language](#), 76% of EU Accession migrant populations live in the private rented sector

¹⁷³ Campbell and Frey, 2010, quoted in Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#) at page 111

¹⁷⁴ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#)

¹⁷⁵ Wallace, McAreavey, and Atkin, (2013) [Poverty and Ethnicity in Northern Ireland: An Evidence Review](#)

¹⁷⁶ Housing Rights Service (2013) [The Hidden Costs of Private Renting in Northern Ireland](#)

transparency among those letting agents sampled and raised, for example, the possibility of both landlords and tenants being charged for the same single service. This practice has been held to be unlawful and in 2018 the Department for Communities issued guidance on the issue¹⁷⁷. The Commission is concerned that those from minority ethnic groups, who may lack knowledge of the private rented sector or their rights, may face additional risk from such practices.

Supporting Rationale – Tied accommodation

- 6.28 Given the potential for exploitation within tied accommodation, rights and market information is likely to be beneficial to individuals living in such accommodation.
- 6.29 2011 research noted that, where a worker's accommodation is tied to their job, the individual *'cannot leave their job as this would render them homeless, creating a vicious circle of working long hours and living in poor conditions'*¹⁷⁸.
- 6.30 The same report found that accommodation can be expensive, overcrowded, excessively controlled by the landlord and unsuitable for children. In relation to the mushroom industry, it cited the example¹⁷⁹ of a worker who was dismissed by the employer after someone else in the household had a confrontation with the landlord.
- 6.31 Living conditions and excessive rent have also been reported, such as a person being charged £25 per week to share a caravan. The main accommodation-related issue that arose with interviewees was of living conditions, such as a lack of facilities, poor quality repairs and a reluctance on the part of the landlord to carry out repairs.

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

- 6.32 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

¹⁷⁷ DfC (2018) [Private Rented Sector Landlord Newsletter no 22, July 2018](#)

¹⁷⁸ Allamby (2011) [Forced labour in Northern: Exploiting Vulnerability](#)

¹⁷⁹ Allamby (2011) [Forced labour in Northern: Exploiting Vulnerability](#), at page 27

Ireland may make them more reluctant¹⁸⁰ than others to disclose their sexual orientation, sex, gender or medical history.

- 6.33 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.

Supporting Rationale

- 6.34 Studies have reported that LGB and transgender people are:

- two and a half times as likely to live alone¹⁸¹;
- twice as likely to be single¹⁸²; and
- four and a half times as likely to have no children to call upon in times of need¹⁸³.

- 6.35 This may result in a lack of informal care being available, potentially leaving an increased proportion of LGB and transgender individuals with the only option of moving into a nursing home or residential care.

- 6.36 The care needs and sensitivities of LGB and transgender people may not automatically be taken into account by service providers in the provision of domiciliary, residential and nursing care¹⁸⁴ and service provision may thus not meet the specific needs of all residents and those receiving respite care.

- 6.37 Further, a study¹⁸⁵ by the Rainbow Project and Age NI (2011) on making care homes more inclusive for LGB and transgender people identified a lack of training provided to those working in care homes. For example the provision of intimate care for transgender people may disclose a person's history.

¹⁸⁰ 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](#)

¹⁸¹ The Rainbow Project and Age NI (2011) [Making this home my home: Making nursing and residential more inclusive for older lesbian, gay, bisexual and/or transgender people](#)

¹⁸² The Rainbow Project and Age NI (2011) [Making this home my home: Making nursing and residential more inclusive for older lesbian, gay, bisexual and/or transgender people](#)

¹⁸³ Dr H Fish (2007) [Reducing health inequalities for lesbian, gay, bisexual and trans people - briefings for health and social care staff](#)

¹⁸⁴ ARK(NI) (2013) Policy Brief, [Moving towards a sexual orientation strategy for Northern Ireland](#)

¹⁸⁵ The Rainbow Project and Age NI (2011) [Making this home my home: Making nursing and residential more inclusive for older lesbian, gay, bisexual and/or transgender people](#)

- 6.38 In 2014 the Public Health Agency¹⁸⁶ developed guidelines to address the health inequalities experienced by older LGB and transgender people in a range of care services. ‘See me, hear me, know me’¹⁸⁷ provides guidance such as training for staff, use of language, and not making assumptions. The guidelines were disseminated to all registered nursing, day care, residential and domiciliary care providers and are available on the Public Health Agency’s website.
- 6.39 In the absence to date of a review of the implementation of the use of the guidelines, we reiterate the importance of ensuring that specific steps are taken to meet the requirements of older LGB and transgender people in residential and nursing home care. This should be done via a proactive approach within policies and procedures to deliver person centred provision of resources and support for older LGB and transgender people.

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.

- 6.40 Should the Department of Health’s¹⁸⁸ plans proceed to reduce residential accommodation for older people¹⁸⁹ it will be vital that older residents are assured that they will receive the same level of care and support in alternative accommodation.
- 6.41 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*’¹⁹⁰ on the role of advocacy and the importance of infrastructure is recommended.

¹⁸⁶ Developed in partnership with Age NI, The Rainbow Project, Here NI, Unison, RQIA and the Independent Health and Care Providers

¹⁸⁷ Public Health Agency (Mar 2014) [See Me, Hear me, Know me: Guidelines to support the needs of Older Lesbian, Gay, Bisexual and Transgender people in nursing, residential, and day care settings and those who live at home and receive domiciliary care](#)

¹⁸⁸ Role of lead department moved from Department of Health, Social Services and Public Safety to Department of Health (DoH) in May 2016

¹⁸⁹ DHSSPS [Transforming Your Care: A review of health and social care in Northern Ireland](#)

¹⁹⁰ 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](#)

Supporting Rationale

- 6.42 Residential care homes provide a community setting, safety and care support for older people. Although funded by Trusts (in part or fully), care and accommodation may be delivered by an independent provider.
- 6.43 ‘Transforming Your Care’¹⁹¹ proposed to reduce residential accommodation for older people. In 2013 the Minister for Health, Social Services and Public Safety announced proposals to reduce the number of statutory residential homes.
- 6.44 The Health and Social Care Board postponed the closures and in 2015 carried out consultations on the proposed closure of ten of the nineteen statutory residential care homes in Northern Ireland. Trusts carried out individual consultations on the plans as they affected them and a final decision is awaited from the Minister of Health.
- 6.45 While the ‘Reconfiguration of Statutory Residential Homes’ guidance¹⁹² states that *‘Trusts should provide detailed information about the characteristics of care homes, if possible including an indication of quality and facilities to support choice’*¹⁹³, it does not have to include details on quality and facilities.
- 6.46 The inclusion of a mandatory assessment would provide some assurance to both residents and relatives/carers that the quality of alternative provision would not be less than that provided in the statutory care home and mitigate potential adverse impact.
- 6.47 Further, removal of the option of statutory residential care in areas and without availability of the necessary adaptations to the home, or alternative residential accommodation, may result in older people remaining longer in hospital.

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

- 6.48 The demographic trend of an ageing population is contributing to an increase in demand for support services and specialised housing in

¹⁹¹ DHSSPS (2011) [Transforming Your Care: A review of health and social care in Northern Ireland](#)

¹⁹² Health and Social Care Board (Nov 2013) [Good Practice Guide – Reconfiguration of Statutory Residential Homes](#), (Version 2.3, 23 September 2013)

¹⁹³ Health and Social Care Board (Nov 2013) [Good Practice Guide – Reconfiguration of Statutory Residential Homes](#), (Version 2.3, 23 September 2013) page 6

old age¹⁹⁴. However it is also the case that sheltered housing has become less attractive to fit, active older people¹⁹⁵.

- 6.49 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 effect¹⁹⁶. We welcome this development and look forward to its publication and implementation of findings.

Supporting Rationale

- 6.50 At the end of March 2014 the age group that experienced the longest social housing waiting times to be re-housed was the 60 to 64 years age group¹⁹⁷.
- 6.51 Despite the longest waiting times for the 60 to 64 years age group, the supply of Northern Ireland Housing Executive (NIHE) dwellings for older people fell from around 31,200 in 1991 to 27,500 in 2009/10¹⁹⁸.
- 6.52 In addition, the location of specialised and age specific accommodation is proportionately high in Belfast which has the lowest proportion of the older population¹⁹⁹. Absolute and relative (geographical) availability may therefore be contributory reasons that the 60 to 64 years age group has the longest wait for social housing.

¹⁹⁴ Northern Ireland Housing Executive (Aug 2008) Older People Housing Policy Review Action Plan 2008 – 2010

¹⁹⁵ 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

¹⁹⁶ Email from NIHE 07.02.19

¹⁹⁷ Wallace, A (2015) Housing and Communities' Inequalities in Northern Ireland

¹⁹⁸ 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

¹⁹⁹ 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

7 Mitigate the long-term negative impacts of Welfare Reform

Summary of recommendations:

- ensure that the mitigation of negative impacts of Welfare Reform continues on a long-term basis
- address the needs of single tenants / prospective tenants aged 35 years and under when renting in the private rented sector
- tackle the barriers which the ‘digital by default’ and telephone advice system of benefits may present to those within some Section 75 categories

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

- 7.1 While noting the mitigations package put in place in Northern Ireland to cushion the impact of Welfare Reform implementation, and concessions around payments, the Commission is concerned at the long-term implications of the Welfare Reform measures on a number of equality groups. We are concerned that the Welfare Reform mitigation 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)²⁰⁰.
- 7.2 In 2015 the United Nations published findings of its Inquiry²⁰¹ 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.
- 7.3 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.

²⁰⁰ 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](#) [16 UN Inquiry into the Rights of Disabled People](#)

²⁰¹ UN (2016) [UN Inquiry into the Rights of Disabled People in the UK](#)

Supporting Rationale

7.4 In 2018 the NIHE concluded that²⁰²:

‘The impact for social tenants and landlords is unlikely to be fully understood until mitigation ends and tenants are faced with rent shortfalls; however, there is already significant concern over how social tenants will meet additional housing costs and for essential living costs’.

7.5 There are not only particular issues for young people and people with disabilities, but across all those who receive benefits. For example, Wallace²⁰³ noted that *‘Interviewees raised concerns about the impact of Welfare Reform, benefits administration and the interaction with immigration legislation on the ability to sustain housing costs for some low-income minority ethnic and minority communities’.*

7.6 Particular pressure exists for those accessing the housing element of Universal Credit. It will be reduced where the benefit cap²⁰⁴ is exceeded (although a supplementary payment will be made to make up the shortfall until March 2020).

7.7 The ‘spare room subsidy’ / ‘bedroom tax’ results in recipients with one or more rooms above the local housing allowance allocation having a 14-25% reduction to their payment. This policy has particular implications for those people with disabilities and parents with part-time caring responsibility, who may require an additional room, for example for carers or children to stay over²⁰⁵.

7.8 Of particular note is the scarcity of one and two bedroom properties within the social housing sector in Northern Ireland. In its 2012 evidence²⁰⁶ to the then Committee for Social Development, the Northern Ireland Housing Executive stated that

“When you look at the make-up of Housing Executive stock, you see that although we have 90,000 properties, somewhere between 10,000 and 12,000 of those are targeted at one-bed accommodation. So, we have around 26,000 under occupying tenancies. If everybody presented at our door tomorrow morning looking for accommodation

²⁰² NIHE (2018) [Welfare Reform in NI – A scoping report](#)

²⁰³ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#), page 129

²⁰⁴ of £20,000 per annum for couples or lone parents with children; £13,400 for single people without responsibility for children.

²⁰⁵ The spare room subsidy / bedroom tax is currently mitigated for existing tenancies, but it applies to new tenancies. Regulations brought into force in Great Britain have provided exemptions for those who require overnight care for a child, or where a couple cannot share a room due to disability. Similar Regulations have not been brought into force in Northern Ireland.

²⁰⁶ NI Assembly Official Report, Committee for Social Development (25 October 2012) [Welfare Reform Bill: Northern Ireland Housing Executive Briefing](#)

that is appropriate to their needs, we would have a major issue to try to deal with that. We would not have the supply to match their needs”.

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

- 7.9 Single people aged 35 years 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 old single people²⁰⁷.
- 7.10 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.
- 7.11 In 2015/16 the Department consulted on a discussion document on a review of the role and regulation of the private rented sector²⁰⁸. It subsequently consulted²⁰⁹ 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 plan²¹⁰ 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.

Supporting Rationale

- 7.12 The cost of private renting is 50% more expensive than social housing²¹¹ and accounts for 21% of total housing in comparison to social rented sector which makes up 13% of total housing²¹². The

²⁰⁷ 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](#)

²⁰⁸ DSD (2015) [Review of the Role and Regulation of the Private Rented Sector in Northern Ireland - discussion document](#)

²⁰⁹ DfC (2016) [Private Rented Sector in Northern Ireland – Proposals for Change](#)

²¹⁰ NI Executive (2017) [PfG Delivery Plan indicators 8 and 48](#)

²¹¹ Joseph Rowntree Foundation (Nov 2014) [What will the housing market look like in 2040?](#)

²¹² DfC (2018) [Family Resources Survey 2016/17](#), published 22.11.18

private rented sector in Northern Ireland has grown steadily, accounting for only 7.6% of housing stock in 2001, it had by 2009 overtaken the social sector in size²¹³.

- 7.13 2018 research in Great Britain stated that, as a result of welfare reform cuts affecting under 35s, there will be *‘growth in the number of households containing ‘hidden homeless’ that are unable to sustain independent accommodation, and it is likely that the incidence of overcrowding will start to rise*²¹⁴. Other potential implications arising from an inability to sustain tenancies, with a potential rise in homelessness, are as set out earlier in this paper.

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

- 7.14 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.
- 7.15 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.
- 7.16 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 claimants²¹⁵.

Supporting Rationale

- 7.17 2018 UK wide data from the ONS²¹⁶ found that there was lower usage of the internet by older people and people with disabilities than the general population. 76.6% of adults with disabilities had used the internet during the previous three months, compared to 93.9% of the general population.
- 7.18 Internet usage decreased with age²¹⁷, with 43.6% of over 75s having recently used it, compared to 99.3% of 16-24 year olds. The age and disability status of respondents is not disaggregated at a

²¹³ NIHE (2018) [Private Tenants Survey 2016](#)

²¹⁴ Rugg and Rhodes, University of York (2018) [The Evolving Private Rented Sector: Its Contribution and Potential](#)

²¹⁵ CAB (2017) [We need to fix Universal Credit](#)

²¹⁶ ONS (2018) [Internet Users, UK: 2018](#)

²¹⁷ ONS (2018) [Internet Users, UK: 2018 data tables](#)

regional level, but Northern Ireland has the lowest recent internet usage of all regions. It has however seen the largest increase in internet usage since 2011 of all UK regions²¹⁸.

7.19 Citizens Advice Scotland has called on the government to *‘ensure citizens are fully supported to access the benefits to which they are entitled in a way that suits their needs, resources and capabilities’*²¹⁹.

7.20 Reinforcing these findings, Yates et al²²⁰ cited in analyses of Ofcom and Oxford Internet Surveys which indicated that the majority of those without internet access were, in addition to the most socially deprived, older (over 55), and more likely to have disabilities or long term health issues. They also argued that the cost savings of online services for government led to additional costs to welfare clients and organisations; that assisted digital support was needed in the long term and to a greater extent than planned; and that support was also needed for the third sector to provide skills development and internet access.

7.21 2011 Research by the Advice Services Alliance²²¹ found that:

‘...delivering a greater proportion of advice by telephone may cause access problems for some clients, for example due to literacy issues, language barriers, problems acting on advice given, or an inability to pick up on non-verbal cues. In addition, telephone providers are likely to have diminished local knowledge. ... Disabled people ... may find it harder to manage their case paperwork through phone services. They may also find it harder to communicate via the phone or manage any emotional distress more remotely.’

²¹⁸ ONS (2018) [Internet Users, UK: 2018](#)

²¹⁹ Citizens Advice Scotland (2013) [Voices from the Frontline: Digital by Default](#)

²²⁰ Yates et al (2015) [In Defence of Welfare 2 Digital by default: reinforcing exclusion through technology](#)

²²¹ Advice Services Alliance (2011) [From face-to-face to telephone advice?](#)

8 Improve equality data collection and analysis

Summary of recommendations:

- address key equality data gaps across a number of areas of public policy
- ensure data is sufficiently disaggregated to allow for meaningful equality analysis, to better inform public policy intervention.

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

- 8.1 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 themes²²², 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.
- 8.2 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.

Supporting Rationale

- 8.3 Despite the Commission’s (2007)²²³ monitoring guidance for public authorities, there remains significant and specific data gaps across a number of public policy areas. For example, key housing datasets offer limited detail with regard to data on minority ethnic groups and

²²² Data gaps were identified regarding gender identity; religion; political opinion; and sexual orientation. Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#).

²²³ ECNI (2007) [Section 75 of the Northern Ireland Act 1998: Monitoring Guidance for Use by Public Authorities](#).

migrants. Instead, any analysis must rely on small scale surveys and qualitative data.

- 8.4 Household level data does not provide a complete picture of the composition of households. For example, in social housing administrative data, the applicant is listed as the person who completed the form, regardless of whether it was a joint application²²⁴. There is no requirement upon the applicant to disclose information regarding some of their personal characteristics, such as their religious background.
- 8.5 Further, in the Northern Ireland House Condition Survey (2018), the household reference person (HRP) is defined as the person who owns the house or pays the rent or mortgage. If this is more than one person then the HRP is taken as the person with the highest annual income^{225 226}. The household may well be more diverse than the HRP, but such data is not captured through this measure.

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

- 8.6 In housing, there is a lack of data disaggregation²²⁷ 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.
- 8.7 Instead, any analysis must often rely on small scale surveys and qualitative data.
- 8.8 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.

²²⁴ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#).

²²⁵ NIHE (2018) [Northern Ireland House Condition Survey 2016](#)

²²⁶ It is also worth considering that the recorded characteristics of those designated as a household reference person may be different depending upon the age of the household reference person. For example, while males are more likely to be recorded as a householder reference person regardless of age, females are more likely to be recorded where households have either a younger (aged 18 to 39 years old - 44.2%) or an older (60 years old or over - 40.0%), rather than a middle aged (40 to 59 years old - 29.3%) household reference person.. Data quoted is from the [Northern Ireland House Condition Survey, 2009](#)

²²⁷ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#)

9 Conclusion

9.1 The Commission will continue to engage with government, relevant departments, elected officials and key stakeholders to ensure advocacy and adoption of our recommendations in support of addressing identified key inequalities.

Priority areas for intervention

9.2 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.

9.3 These will represent priorities for proactive action by the Commission now and over the coming period.

Overarching areas for action

9.4 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 Communities²²⁸.

9.5 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.**

²²⁸ ECNI (2017) [Statement on Key Inequalities in Housing and Communities](#)

- **Address the specific housing needs of particular equality groups.**

9.6 We also call for action across two additional cross-cutting priority areas:

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

Further information

9.7 For further information, visit

www.equalityni.org/HousingPolicy

February 2019