



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

Response to: Housing Supply Strategy – Call for Evidence

Issued by: Department for Communities (DfC)

May 2021

**Prepared by: Siobhán Harding
Women's Support Network
Email: policy@wsn.org.uk**



**Foyle Women's
Information
Network**



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

1. Introduction

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

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

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

1.3 The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and

¹ Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisation

support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

1.4 The Women's Regional Consortium appreciates the opportunity to respond to the Housing Supply Strategy Call for Evidence. Access to suitable, good quality and secure housing has significant impacts for health, wellbeing and quality of life. As summarised by Public Health England: *"the right home environment is critical to our health and wellbeing; good housing helps people stay healthy, and provides a base from which to sustain a job, contribute to the community, and achieve a decent quality of life."*²

1.5 Throughout this response the Consortium has sought to ensure the voices of women are represented. We believe that it is essential for policy makers and Government to listen to the voices of the women who live here. We have attempted to include throughout this response some of what local women have said in relation to their experiences of housing supply issues. We hope that their views, experiences and suggestions will be reflected in any revised Housing Supply Strategy. Given that women represent half the population in Northern Ireland their needs and experiences must be reflected in this important policy area.

1.6 We wish to endorse the response made by our colleagues in Housing Rights. We fully endorse their response as experts in this area and urge the Department for Communities to take their evidence and recommendations fully into consideration.

² Preventing Homelessness to Improve Health and Wellbeing, Public Health England
[Final Rapid Review summary.pdf \(homeless.org.uk\)](https://homeless.org.uk/Final_Rapid_Review_summary.pdf)

2.0 General comments

Access to suitable, good quality and affordable housing can help prevent the negative impacts of poverty, debt and poor mental and physical health. Housing supply is therefore a critical consideration in the lives of people, families and communities. It is particularly relevant to those living on the lowest incomes who are so often subject to issues with unsuitable, poor quality and unaffordable housing.

Before addressing the specific questions asked in the Call for Evidence we would like to outline a number of issues which cannot and must not be seen in isolation from considerations around Housing Supply. All these issues are inter-linked and have an impact on each other therefore due consideration must be given to these factors.

2.1 Gender Inequality

A decade of welfare reform/austerity measures which have impacted more on women, the predicted worsening of existing inequalities as a result of the Covid19 pandemic and the likely adverse impacts of Brexit particularly in Northern Ireland gives rise for concern about a deterioration in gender equality for women. These are issues that we believe must be considerations within a Housing Supply Strategy and associated EQIAs.

A gender-neutral approach to policy and decision making has been the standard across Government and this has not served women well as it fails to take account of the different experiences of men and women as a result of existing gender inequalities. A failure to account for these gender dynamics means that the design of policies and budgets can aggravate existing gender inequality and may not benefit women and men equally.

The CEDAW Committee has also cautioned on the dangers of gender neutrality. CEDAW calls for substantive equality³ to go beyond paying lip service to gender

³ General Recommendations Adopted by the Committee on the Elimination of Discrimination against Women, Thirtieth session (2004), General Recommendation No 25
https://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/1_Global/INT_CEDAW_GEC_3733_E.pdf

mainstreaming and demonstrate the meaningful integration of an equalities perspective into all systems and policies. It states that a purely formal approach is not sufficient to achieve women's equality with men and requires that women are given an equal start and empowered by an enabling environment to achieve equality of results. *"It is not enough to guarantee women treatment that is identical to that of men. Rather, biological as well as socially and culturally constructed differences between women and men must be taken into account."*⁴ The issue of gender neutrality is a significant barrier to women's equality and this issue must be recognised by the DfC in all its work.

Gendered social norms restrict and limit women's roles in the economy, thereby contributing to women's economic disadvantage relative to men.⁵ Women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure work and also more likely to be providing care either for children or other family members which limits their ability to carry out paid work. This contributes to keeping women's incomes generally lower over their lifetimes and therefore means they are more likely to be dependent on men or the state through social security benefits.

Any decision-making, policies and budgets must recognise the different circumstances with which women and men experience systems and economies. In practice men and women are rarely in similar circumstances due to existing gender inequalities and these gendered social norms. An example of this is provided by Universal Credit. The Department of Work and Pensions has described its UC policy as gender-neutral. However, the Women's Budget Group⁶ has highlighted that rather than gender-neutral aspects of Universal Credit disproportionately affect women. This includes conditionality for parents and incentives for second earners as well as using a traditionally gendered 'male breadwinner' model.

⁴ Ibid, paragraph 8

⁵ Violence against Women and Girls and women's economic inequality, Eva Neitzert, March 2020 <https://wbg.org.uk/wp-content/uploads/2020/07/Violence-and-womens-economic-equality.pdf>

⁶ 'Gender-neutral': Universal Credit Equality Impact Assessments, Women's Budget Group, January 2019 <https://wbg.org.uk/blog/gender-neutral-universal-credit-equality-impact-assessments/>

Locally, research by the Women's Regional Consortium⁷ also analyses a number of key design features of Universal Credit which are likely to have disproportionate impacts on women including the single payment, conditionality, work allowances, childcare payments as well as the impact of the five-week wait, two-child limit and Benefit Cap on women as Universal Credit claimants.

“In the NI Assembly they are gender neutralising everything. They don’t want to address women’s issues, they don’t want to open doors for women, they don’t see across the different types of women. They want to remove women from things – if they do something for women then they have to do it for men. They don’t see the impact of Universal Credit, Covid, etc on women.”
(Participant at Consultation Event)

“Women, the elderly and disabled are consistently at the bottom of the pile in terms of their importance and value.”
(Participant at Consultation Event)

“Women are the biggest percentage of people here but unfortunately we are not given priority.”
(Participant at Consultation Event)

“We have to keep knocking on doors and fighting for our rights. Women bear the brunt of a lot of issues. In families it is women who are fighting for rights.”
(Participant at Consultation Event)

“We should all go on strike! We saw what happened with Covid in the emergency responses women were always sidelined. There is a need to value what women do. Women are always the add on at the end and it’s totally frustrating.”
(Participant at Consultation Event)

“Caring work is not valued in society and is the bedrock of everything. The value of care and all the stuff normally done within the home. This is at the root of everything and why women can’t participate properly. There is a circular relationship between not valuing care work and undervaluing women.”

⁷ The Impact of Universal Credit on Women, Women's Regional Consortium, September 2020
<http://www.womensregionalconsortiumni.org.uk/sites/default/files/The%20Impact%20of%20Universal%20Credit%20on%20WomenRevised.pdf>

It is undervalued because it is something that women do – there is underlying misogyny.”

(Participant at Consultation Event)

2.2 Women, Poverty, Austerity and Welfare Reform

Poverty is already an issue which impacts on the lives of many women in Northern Ireland and is harmful not only to the women themselves but to their children, families and wider communities. Women are generally more likely than men to live in poverty across their lifetimes. Lone parents (in Northern Ireland 91% of lone parents are women⁸) are even more vulnerable to poverty. In Northern Ireland 37% of single parents are living in poverty.⁹ Women often bear the brunt of poverty in the home managing household budgets to shield their children from its worst effects. This means that women end up acting as the ‘shock absorbers’ of poverty going without food, clothes or warmth in order to meet the needs of other family members when money is tight.¹⁰

“As long as my two kids are fed and watered I don’t care if I eat.”

(Quote taken from Women’s Regional Consortium Research on the Impact of Austerity/Welfare Reform on Women, March 2019)

As previously stated, women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure work and also more likely to be providing care which limits their ability to carry out paid work. This contributes to keeping women’s incomes generally lower over their lifetimes and therefore puts them at greater risk of poverty. These existing gender inequalities are also likely to be further worsened due to the Covid19 pandemic.

⁸ Census 2011 – Key Statistics for Gender, Research and Information Service Research Paper, Ronan Savage and Dr Raymond Russell, Northern Ireland Assembly, 5 September 2014
<http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2015/general/3415.pdf>

⁹ Households Below Average Income: Northern Ireland 2018/19, DfC & NISRA
<https://www.communities-ni.gov.uk/system/files/publications/communities/hbai-2018-19.pdf>

¹⁰ A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women’s Budget Group, February 2019
<https://fabians.org.uk/a-female-face/>

“At the end of the day women and mothers are left with the burden of these issues (referring to low-incomes and poverty). They worry about these things.”

(Quote taken from Women’s Regional Consortium Research on the Impact of Austerity/Welfare Reform on Women, March 2019)

The social security system has a vital role to play in easing the impact of poverty on people and families. As the Covid19 pandemic has shown, people need to be able to rely on the social security system when times get tough and they are hit by unexpected costs or lost earnings.

A decade of austerity and welfare reform policies have disproportionately impacted on women. Research by the House of Commons Library shows that 86% of the savings to the Treasury through tax and benefit changes since 2010 will have come from women. It shows that, by 2020, men will have borne just 14% of the total burden of welfare cuts, compared with 86% for women.¹¹ These welfare reform and austerity measures have tended to limit the ability of the system to protect against poverty.¹²

Locally, an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)¹³ showed that across most income levels the overall cash impact of the reforms is more negative for women than for men. This is particularly the case for lone parents (who are mostly women) who lose £2,250 on average, equivalent to almost 10% of their net income.

“I don’t know how anyone does it as a single parent. The cost of milk, nappies. There is a ripple effect on children.”

(Quote taken from Women’s Regional Consortium Research on the Impact of Austerity/Welfare Reform on Women, March 2019)

¹¹ Estimating the gender impact of tax and benefit changes, Richard Cracknell, Richard Keen, Commons Briefing Papers SN06758, December 2017

<http://researchbriefings.files.parliament.uk/documents/SN06758/SN06758.pdf>

¹² Protecting dignity, fighting poverty and promoting social inclusion in devolved social security, Dr Mark Simpson, Ulster University, June 2018

http://www.niassembly.gov.uk/globalassets/documents/raise/knowledge_exchange/briefing_papers/series_7/simpson060618.pdf

¹³ Cumulative impact assessment of tax and social security reforms in Northern Ireland, NIHRC, November 2019

https://www.nihrc.org/uploads/publications/Final_CIA_report_Oct_2019.pdf

Research by the Women's Regional Consortium on the impact of austerity¹⁴ and on the impact of Universal Credit¹⁵ on women shows the extent to which changes to the social security system have worsened women's ability to provide for their children and families and made them more vulnerable to financial hardship and poverty. Gendered policies such as the two-child limit and Benefit Cap as well as the introduction of Universal Credit which has been described as discriminatory by design have caused many women to struggle to afford the basics and to feed and provide for their children and families.

"It's degrading – how can I provide for my family? Kids ask can we get this, can we get that and I have to say no all the time."

(Quote taken from Women's Regional Consortium Research on the Impact of Austerity/Welfare Reform on Women, March 2019)

Concerns about austerity measures have been raised internationally by the CEDAW Committee. Following its recent examination of the UK, the CEDAW Committee raised concerns about the impact of austerity measures on women stating its concern about the *"disproportionately negative impact of austerity measures on women, who constitute the vast majority of single parents and are more likely to be engaged in informal, temporary or precarious employment."*¹⁶ The Committee recommended that the UK government *"undertake a comprehensive assessment on the impact of austerity measures on the rights of women and adopt measures to mitigate and remedy the negative consequences without delay."*¹⁷

Addressing women's disadvantage in the economy requires action to ensure that women are able to be economically independent not only through paid work but also through a properly supportive social security system which provides a safety net when

¹⁴ Impact of Ongoing Austerity: Women's Perspectives, Women's Regional Consortium, March 2019 <http://www.womensregionalconsortiumni.org.uk/sites/default/files/Impact%20of%20Ongoing%20Austerity%20Women%27s%20Perspectives.pdf>

¹⁵ The Impact of Universal Credit on Women, Women's Regional Consortium, September 2020 <http://www.womensregionalconsortiumni.org.uk/sites/default/files/The%20Impact%20of%20Universal%20Credit%20on%20WomenRevised.pdf>

¹⁶ Concluding Observations on the eighth periodic report of United Kingdom of Great Britain and Northern Ireland, CEDAW/C/GBR/CO/8, March 2019 (para 17) https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GBR/CO/8%20&Lang=En

¹⁷ Ibid, para 18

women are not able to work. It is important that individual government departments recognise the contextual factors which increase women's vulnerability to poverty. These include high rates of female economic inactivity, no childcare strategy, high numbers of women with adult care responsibilities, a weak labour market, high numbers of women working part-time and in precarious jobs and wages lower than the UK average.¹⁸

All these issues have an impact on the ability of women to access suitable housing. Affordability is a key issue for many on the lowest incomes and changes to the social security system through welfare reform have weakened the housing safety net.

“The benefits system forces women with children to go out to work. But there is a lack of jobs available and the jobs that are available are often the lowest paid which means that women can’t afford childcare or you end up paying to work.”

(Participant at Consultation Event)

“The social security system does not allow people to live lives with dignity.”

(Participant at Consultation Event)

“The benefits system doesn’t help people to go out and seek work. The jobs women do are often the lowest paid. If they leave benefits for low paid work they just end up getting further into the poverty trap.”

(Participant at Consultation Event)

“Even before Covid there were lots of people reliant on foodbanks because of Universal Credit, the 5-week wait, 2 child limit, etc. These things only push people into poverty. UC is not fair to people it just penalises people. I feel there are not the right benefits in place.”

(Participant at Consultation Event)

2.2.1 Universal Credit

Women's Regional Consortium research on the impact of Universal Credit on Women¹⁹ has shown that women's experiences living on Universal Credit are

¹⁸ Shadow report for the examination of the UK by the Committee on the Convention to Eliminate Discrimination against Women, NIWEP, January 2019

¹⁹ The Impact of Universal Credit on Women, Women's Regional Consortium, September 2020
<http://www.womensregionalconsortiumni.org.uk/sites/default/files/The%20Impact%20of%20Universal%20Credit%20on%20WomenRevised.pdf>

overwhelmingly negative. The research highlights how the design of Universal Credit does little to protect women and their children from living on low incomes and in poverty. The research recommended that in its recovery response Government should apply an intersectional gender lens to social security policy, particularly in relation to Universal Credit, so that policies are developed and implemented to specifically support women who have been impacted by the Coronavirus crisis.

“With just Universal Credit it’s no life to live. We can’t have the heating on just when it’s really cold because we can’t afford the gas, we had to have just hot water bottles at night. Thank God for food banks otherwise eating would have been much worse. No new clothes! I’m glad my little one is only small and doesn’t seem to pick up on trends and knows we don’t have much money so she doesn’t ask for much because I can never afford it.”

(Quote taken from Women’s Regional Consortium Research on the Impact of Universal Credit on Women, September 2020)

The research further showed the harsh impacts of the Universal Credit five-week wait on women and their families. Almost all of the women reported negative impacts due to the five-week wait. Many had needed to borrow money from family members/friends or lenders to survive. Some had been forced to cut back on food/essentials to make ends meet and others had resorted to selling their possessions or using a foodbank. The personal impacts of the five-week wait were severe with 89% of the women suffering stress/anxiety as a result of the wait and the worry about how they would provide for their families. Others reported getting into debt or further in debt and getting behind with their bills. Sadly, some of the women reported that the five-week wait had impacted negatively on their children or that they had felt cold/hungry due to a lack of money.

“We had to wait 6-7 weeks on the first payment of UC and it was an absolute nightmare. We really struggled. We had to go to the foodbank and call St Vincent de Paul for help.”

“The five-week wait was horrendous. I sold my sofa and had to borrow as well.”

“It would really help if you got a payment in the initial wait that you didn’t have to pay back. It would help you not get into any more debt.”

“If I had known about the Contingency Fund that would have really helped. Now they are taking £75/month off me and I’m really struggling and getting into more debt.”

(Quotes taken from Women’s Regional Consortium Research on the Impact of Universal Credit on Women, September 2020)

2.3 Welfare Reform Mitigations

In Northern Ireland a package of mitigation measures was agreed by the Northern Ireland Executive to protect some claimants from the harshest impacts of welfare reform.²⁰ This included important mitigation payments around the Benefit Cap and Bedroom Tax as well as providing some help around Universal Credit.

The New Decade, New Approach agreement²¹ committed to both extending existing mitigations in Northern Ireland beyond March 2020 when they were due to run out and to carry out a review of the mitigation measures. The Cliff Edge Coalition²² have been campaigning not only for the extension of the existing mitigations (and the closing of loopholes in the Benefit Cap and Bedroom Tax mitigations which mean that some claimants are not protected) but for their strengthening to include new challenges such as Universal Credit and the two-child limit.²³

We believe these mitigations provide vital protections for the people of Northern Ireland especially for the many women who have been so adversely affected by

²⁰ Welfare Reform Mitigations Working Group Report, Professor Eileen Evason, January 2016
<https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm/welfare-reform-mitigations-working-group-report.pdf>

²¹ New Decade, New Approach, January 2020

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856998/2020-01-08_a_new_decade_a_new_approach.pdf

²² The Cliff Edge NI Coalition is a group of over 100 organisations from across Northern Ireland who came together to express concerns about the end of welfare reform mitigations in March 2020. The Women’s Support Network is a member of the Coalition’s Working Group and the Women’s Regional Consortium is a Coalition member.

²³ Cliff Edge Briefing Paper, September 2020

<https://lawcentreni.s3.amazonaws.com/Cliff-Edge-Coalition-Briefing-Dec-2019v2.pdf>

welfare reform policies. Equality statistics on the existing mitigation payments show that these were paid to more women than men.²⁴

Mitigation payments are even more vital in the context of the pandemic which is also hitting women so hard (see section 2.4). Strengthening the existing mitigations to provide protections around the two-child limit, Universal Credit and the private rented sector is necessary to protect people, including many women, from the devastating impact of Covid19 and the resulting economic crisis which will follow. Investing in the benefits system to help people get through this crisis is a sensible approach.

2.4 The Impact of the Covid-19 pandemic on Women

The pandemic has underscored the income inequality that exists after a decade of austerity following the financial crisis. Women are paid less on average than men, women are more likely to work part-time and in low-paid, insecure work. Women are more likely to be providing care for children/family members and are more likely to claim social security benefits. Women are also more likely to have to make up for cuts to public services through unpaid work.

The ongoing Covid19 pandemic affects men and women differently and for many has deepened the inequalities they already experience. Women are more likely to bear the brunt of this crisis for a number of reasons:

- Women are more likely to be low paid and in insecure employment. Women were the majority of low paid earners (69%) the majority of those in part-time employment (74%), involuntary part-time employment (57%), temporary employment (54%), zero-hours contracts (54%) and part-time self-employment (59%).²⁵

²⁴ Northern Ireland Welfare Supplementary Payment Schemes, Section 75 statistics November 2017 to April 2019, DfC

<https://www.communities-ni.gov.uk/publications/welfare-supplementary-payments-discretionary-support-standards-advice-assistance-and-sanctions>

²⁵ Submission to the Women and Equalities Select Committee inquiry: Unequal impact? Coronavirus and the gendered economic impact, Women's Budget Group, June 2020

<https://wbg.org.uk/wp-content/uploads/2020/06/WBG-Gender-economic-impact-submission.pdf>

- Female employees were more likely than male employees to be working in jobs paying the National Minimum Wage. Low paid women were more likely than low paid men to remain stuck in low paid jobs;²⁶
- Women are twice as likely to be key workers as men, 65% of key workers are female compared to 47% of the whole working population;²⁷
- In Northern Ireland women make up 79% of health and social care staff.²⁸
- Many of the workers in health and social care sectors are low paid. 98% of the 1 million high exposure key workers being paid less than 60% of median average wages are women.²⁹
- Employed women were a third more likely than employed men to work in shut-down sectors over the first national lockdown with one in six (17%) of female employees in such sectors compared to one in seven (13%) of male employees³⁰ making them at particular risk of job loss.
- HMRC statistics show that across the UK more women than men were furloughed with 1.92 million females furloughed at 30 November 2020 compared with 1.79 million men.³¹
- On average, women carried out 60% more unpaid work than men reducing the time available for paid work meaning that they earn less, own less and are more likely to be living in poverty.³²

²⁶ Unequal impact? Coronavirus and the gendered economic impact, Women & Equalities Committee, UK Parliament, February 2021

<https://publications.parliament.uk/pa/cm5801/cmselect/cmwomeq/385/38502.htm>

²⁷ Risky business, Economic impacts of the coronavirus crisis on different groups of workers, Resolution Foundation Briefing, April 2020

<https://www.resolutionfoundation.org/app/uploads/2019/10/Risky-business.pdf>

²⁸ Who Runs Northern Ireland? A Summary of Statistics Relating to Gender and Power in 2020, Northern Ireland Assembly Briefing Paper, January 2020

http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2017-2022/2020/assembly_exec_review/0120.pdf

²⁹ Low-paid women in UK at 'high risk of coronavirus exposure', The Guardian, March 2020

<https://www.theguardian.com/world/2020/mar/29/low-paid-women-in-uk-at-high-risk-of-coronavirus-exposure>

³⁰ Sector shutdowns during the coronavirus crisis: which workers are most exposed? Institute for Fiscal Studies Briefing Note BN278, April 2020

<https://www.ifs.org.uk/uploads/BN278-Sector-Shutdowns.pdf>

³¹ Coronavirus Job Retention Scheme statistics: January 2021, HMRC

<https://www.gov.uk/government/statistics/coronavirus-job-retention-scheme-statistics-january-2021/coronavirus-job-retention-scheme-statistics-january-2021>

³² Women shoulder the responsibility of 'unpaid work', Office for National Statistics, November 2016
<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/articles/womenshouldtheresponsibilityofunpaidwork/2016-11-10>

- Women are less likely to be eligible for Statutory Sick Pay (SSP) because they are overrepresented in low paid work and on zero hours contracts. Women's Budget Group calculations find that 15.5% of women and 10.6% of men do not earn enough to qualify for SSP.³³ This points to a disproportionate financial impact of self-isolation on women.

In July 2020 the Women's Policy Group Northern Ireland published a comprehensive Feminist Recovery Plan³⁴ highlighting many of these issues and calling on decision-makers across the UK to take action to ensure a gender-sensitive response in the transition from crisis response to recovery. This plan provided clear evidence for how to prioritise actions coming out of the pandemic. Despite this call there has been little progress in alleviating the impact of the pandemic on women. The Feminist Recovery Plan is currently being updated and will be relaunched on 28th July 2021.³⁵

A Women and Equalities Committee report³⁶ into the gendered economic impact of the Covid19 crisis has highlighted how existing gendered inequalities in the economy have been ignored and sometimes exacerbated by the pandemic policy response. The Committee stated: *"We are concerned that the Government Equalities Office (GEO) did not anticipate how inequalities were likely to be exacerbated by the pandemic and ensure that it influenced the policy response, including in relation to employment, welfare, childcare and pregnancy and maternity. We have seen little evidence that the Government has conducted any robust or meaningful analysis of the gendered impact of its economic policies during the Coronavirus crisis."*

Following the publication of this report a coalition of organisations including the Trades Union Congress (TUC), Amnesty International, Save the Children and the Fawcett

³³ Submission to the Women and Equalities Select Committee inquiry: Unequal impact? Coronavirus and the gendered economic impact, Women's Budget Group, June 2020

<https://wbq.org.uk/wp-content/uploads/2020/06/WBG-Gender-economic-impact-submission.pdf>

³⁴ Covid-19 Feminist Recovery Plan, Women's Policy Group NI, July 2020

<https://wrda.net/wp-content/uploads/2020/07/WPG-NI-Feminist-Recovery-Plan-2020-.pdf>

³⁵ Check the WRDA website for the updated Feminist Recovery Plan after 28/07/21

<https://wrda.net/feminist-recovery-plan/>

³⁶ Unequal impact? Coronavirus and the gendered economic impact, Women & Equalities Committee, UK Parliament, February 2021

<https://publications.parliament.uk/pa/cm5801/cmselect/cmwomeq/385/38502.htm>

Society have signed a letter to the Equality and Human Rights Commission (EHRC) arguing that the government has failed in its duty to consider the impact of key policies on women and other groups protected under the Equality Act.³⁷ The letter states: *“This is a time of crisis for women. The coronavirus pandemic is having a significant and disproportionate impact on women’s health, jobs and livelihoods. The policy decisions taken by government and other key public bodies in response to coronavirus are worsening the impact of the pandemic and deepening inequalities faced by women. The consequences of these decisions will affect women for years to come.”*

It is clear that some groups are particularly affected by pandemic. The low paid, young and female workers stand out as the groups putting their lives at risk by continuing to work in close proximity to others, and most likely to be experiencing direct financial pain from the economic shut down.³⁸ This must therefore be the focus of the actions coming from all the government departments in Northern Ireland and particularly the DfC as the department responsible for social security benefits, employment support and promoting social inclusion including gender equality.

It is imperative that as society emerges from the Covid19 pandemic and resulting recession that women must not pay the price as they did for the previous financial crash. Women have already suffered immensely due to a decade of austerity policies and this must not be allowed to happen again. There is a real need across government for targeted support to ensure that those who have been impacted the most by this pandemic are given the help they need to prevent and reduce poverty and financial hardship. This must include help to ensure that these groups have access to suitable, affordable housing and that those in financial hardship as a result of the pandemic are supported to afford and remain in their homes and are given the necessary protections from hardship and evictions.

³⁷ <https://www.theguardian.com/society/2021/feb/15/ehrc-urged-to-investigate-ministers-for-equality-failures-in-covid-response>

³⁸ Risky business, Economic impacts of the coronavirus crisis on different groups of workers, Resolution Foundation Briefing, April 2020
<https://www.resolutionfoundation.org/app/uploads/2019/10/Risky-business.pdf>

“Women don’t have equal rights and Covid has highlighted a lot of that. Women are struggling with homeworking, looking after children and working at the same time. Men’s jobs are seen as more important.”

(Participant at Consultation Event)

“It’s a real hard time for everyone especially women.”

(Participant at Consultation Event)

“Caring mostly falls to women, it’s a big issue for women.”

(Participant at Consultation Event)

“There is still the assumption that it is women who will provide care. If there is care needed it is assumed that women will provide it whether for parents, children or grandchildren. Women are expected to care yet there are not the services there to support them.”

(Participant at Consultation Event)

2.5 The Impact of the Covid-19 pandemic on the Social Security System

Job losses, reductions in working hours and the need to provide increasing levels of care as a result of the Covid19 pandemic is likely to increase dependence on social security benefits. The social security system has a vital role to play in easing the impact of financial hardship and poverty on people and families. This is particularly the case for Universal Credit as the main benefit claimed by those who are experiencing reduced incomes.

It is important to note the impact of the Covid19 pandemic on Universal Credit claimant numbers. In Northern Ireland new claims to Universal Credit experienced a massive increase as a result of the lockdown rising to 35,420 new claims in March 2020 from 6,630 new claims in February 2020. There are now 118,130 households on Universal Credit in Northern Ireland an annual percentage increase of 104%.³⁹

It is arguable that there has never been a greater need for Universal Credit and the social security system to help people navigate their way through these unprecedented circumstances and to help prevent financial hardship and poverty. This need is likely

³⁹ Universal Credit: Northern Ireland, DfC & NISRA, May 2021
[NI Universal Credit Statistics Feb 2021 \(communities-ni.gov.uk\)](https://communities-ni.gov.uk/northern-ireland/universal-credit-statistics-feb-2021)

to remain well into the future not just during lockdown restrictions as the economy is unlikely to recover for some considerable time.

As society emerges from the Covid19 pandemic and the resulting recession it is imperative that women do not pay the price as they did for the previous financial crash. Part of the solution must be to ensure that the benefits system (particularly Universal Credit as the Government's main welfare provision and which includes help with housing costs) provides sufficient support to the large numbers of women likely to be impacted by the crisis due to existing gender norms.

2.6 Women and Housing

Women are particularly vulnerable to issues around housing availability and affordability because women have lower incomes and lower levels of wealth than men making it more difficult for them to secure adequate housing on their own. Women's ability to afford their own home or to rent privately is determined by their access to paid employment and to social security benefits. As previously stated women are more likely to be in low-paid, part-time and insecure work as well as being more likely to claim social security benefits. 59% of Housing Benefit claimants are women⁴⁰ reflecting women's lower incomes.

In addition, gendered norms mean that women are more likely to be providing care than men both for children and for other family members. This causes them to face specific challenges in trying to secure suitable accommodation for them and their families. The surrounding infrastructure in terms of access to public transport, proximity to schools, shops and other facilities such as childcare, healthcare and leisure settings are also important considerations for housing supply for women.

As the Women's Budget Group states housing is a feminist issue: *"Women are doubly impacted by the housing crisis as a result of their disadvantaged economic position and their disproportionate responsibility for care work."*⁴¹

⁴⁰ Information provided in an email to Women's Support Network from the DfC in November 2020

⁴¹ A home of her own, Housing and Women, Women's Budget Group, July 2019
<https://wbg.org.uk/wp-content/uploads/2019/07/WBG19-Housing-Report-full-digital.pdf>

Since 2010 there has been a reduction in overall government spending through welfare reform and austerity measures, reductions in housing benefit rates and eligibility and changes to the size and status of the social housing sector. All these changes have eroded the housing safety net provided by the social security system which will have greater impacts for low-income women who are more likely to claim social security benefits.

In its work on a Housing Supply Strategy the DfC must not take a gender-neutral approach. It is clear that women are more vulnerable to housing supply, affordability and suitability issues and this should form the basis on which decisions are made and priorities are developed by government in relation to these issues.

2.6.1 Domestic Violence and Housing

Safety is a key issue for women in relation to housing. Domestic abuse and other forms of violence against women are a key cause of homelessness for women and children. Domestic abuse is gendered with the majority of domestic abuse victims being women. Research by Crisis⁴² estimated that 61% of homeless women in Great Britain were homeless because of domestic abuse. Domestic abuse is the leading cause of homelessness for women and in some homeless shelters as many as 50% of women clients have experienced domestic abuse.⁴³ The lack of suitable, affordable homes means that many women suffering from domestic abuse are forced into the impossible choice of staying with their abuser or making them and their children homeless.

The Femicide Census 2018⁴⁴ showed that 41% of women killed by their partner had separated or taken steps to separate from him and this is often the most dangerous

⁴² Nations apart? Experiences of single homeless people across Great Britain, Crisis, December 2014 https://www.crisis.org.uk/media/20608/crisis_nations_apart_2014.pdf

⁴³ Safe at Home, The case for a response to domestic abuse by housing providers, SafeLives, March 2018 [2018-03-28-web-ready-safe-at-home-report.pdf \(gentoogroup.com\)](https://www.safeathome.org.uk/wp-content/uploads/2018/03/28-web-ready-safe-at-home-report.pdf)

⁴⁴ Annual Report on UK Femicides 2018, Femicide Census [Femicide-Census-Report-on-2018-Femicides-.pdf \(femicidecensus.org\)](https://www.femicidecensus.org/femicide-census-report-on-2018-femicides.pdf)

time for women experiencing abuse. This highlights the importance of having safe and secure places for women to live when they have made the decision to leave.

Figures from Women's Aid in Northern Ireland show that in 2019/20, 561 women and 316 children stayed in Women's Aid refuges across Northern Ireland. A further 276 women couldn't access refuge as it was full.⁴⁵ These specialised and secure refuges are key to ensuring that victims, particularly women, have somewhere to turn when trying to escape abuse. The fact that so many women were unable to access refuge points to the need for appropriate funding of refuges to meet demand. It is essential that these services receive secure funding which keeps pace with increases in the cost of living so that they can properly support women through the provision of refuge accommodation.

The Covid19 pandemic and associated lockdown measures have led to substantial increases in domestic violence rates. Statistics from the Police Service of Northern Ireland (PSNI)⁴⁶ show that during the 12 months from 1 January 2020 to 31 December 2020 there were 31,848 domestic abuse incidents in Northern Ireland, one of the highest rates since records began in 2004/05. This points to the urgent need for increased funding for these specialist services to meet demand.

Access to housing, secure tenancies and the appropriate funding of refuges must be complaint with the Istanbul Convention. Article 20 of the Convention⁴⁷ states: *“Parties shall take the necessary legislative or other measures to ensure that victims have access to services facilitating their recovery from violence. These measures should include, when necessary, services such as legal and psychological counselling, financial assistance, housing, education, training and assistance in finding*

⁴⁵ Women's Aid Federation Northern Ireland Annual Report 2019-20, Women's Aid Federation NI, December 2020
<https://www.womensaidni.org/assets/uploads/2020/12/Final-Womens-Aid-Annual-Report-2019-20.pdf>

⁴⁶ Domestic Abuse Incidents and Crimes Recorded by the Police in Northern Ireland, Update to 31 December 2020, PSNI & NISRA, February 2021
[Domestic Abuse Incidents and Crimes Recorded by the Police \(psni.police.uk\)](https://www.psnipolice.uk/)

⁴⁷ Council of Europe Convention on preventing and combating violence against women and domestic violence, April 2011
[Council of Europe Convention on preventing and combating violence against women and domestic violence \(coe.int\)](https://www.coe.int/t/e/treaties/Convention+on+preventing+and+combating+violence+against+women+and+domestic+violence+(coe.int)/Convention+on+preventing+and+combating+violence+against+women+and+domestic+violence+(coe.int).pdf)

*employment.” In addition, an explanatory report to the Convention recommends: “safe accommodation in specialised women’s shelters, available in every region, with one family place per 10 000 head of population.”*⁴⁸

It is clear that the ability of survivors of domestic abuse to rebuild their lives can be severely limited by a lack of suitable housing at the same time as refuge services are under-funded. It is also important that the housing available to survivors is appropriate for their particular needs including the needs of disabled women and children.

2.6.2 The Domestic Abuse and Family Proceedings Bill

The Domestic Abuse Bill in England and Wales contains provisions to support victims of domestic abuse in social housing to leave their abusive situation by providing for secure tenancies for social housing upon leaving abusive relationships. It also places a duty on local authorities in England to provide accommodation based support to victims of domestic abuse and their children in refuges and other safe accommodation.

However, the Domestic Abuse and Family Proceedings Bill does not contain provisions on housing. In its submission to the Committee for Justice on the Domestic Abuse and Family Proceedings Bill the Women’s Aid Federation highlighted the importance of housing for women who are thinking of leaving or who have left abusive relationships. They believe that the absence of any reference to housing in the Domestic Abuse and Family Proceedings Bill is a significant oversight and embeds a ‘silo’ approach to legislation that may ultimately undermine its effectiveness.⁴⁹

The Women’s Policy Group (WPG) also raised concerns about a lack of reference to housing in their submission on the Bill.⁵⁰ The WPG called for similar protections to

⁴⁸ Explanatory Report to the Council of Europe Convention on preventing and combating violence against women and domestic violence

[CETS 210 - Explanatory Report to the Council of Europe Convention on preventing and combating violence against women and domestic violence \(coe.int\)](#)

⁴⁹ Report on the Domestic Abuse and Family Proceedings Bill, Committee for Justice, Northern Ireland Assembly, October 2020

[Committee for Justice - Report on the Domestic Abuse and Family Proceedings Bill \(niassembly.gov.uk\)](#)

⁵⁰ Women’s Policy Group NI Evidence Submission to Justice Committee Domestic Abuse and Family Proceedings Bill 2020, Women’s Policy Group, June 2020

[WPG-NI-Evidence-Submission-to-Justice-Committee-05.06.20.pdf \(wrda.net\)](#)

those provided for in the Domestic Abuse Bill also being provided to victims and survivors in Northern Ireland. The WPG stressed the need for the Domestic Abuse and Family Proceedings Bill to be appropriately resourced given that no refuges in Northern Ireland have had an uplift to their budgets for over a decade effectively meaning they have seen a cut and have had to find additional funding to cover their costs.

As previously outlined the pandemic has seen significant increases in domestic violence statistics. Cuts to these services cannot be allowed to happen again especially as we face into another recession as a result of the economic fallout from the pandemic. Specialist services for domestic abuse must be adequately funded and this should be provided for within any new domestic abuse legislation for Northern Ireland.

In their submission the WPG also raised concerns about potential changes to social housing allocation with the introduction of a policy that would allow NIHE to offer private rentals on par with social housing and that this would be considered a reasonable offer. The WPG argue that social housing is beneficial for women who have experienced domestic abuse as it provides longer tenancy agreements than the annual tenancies associated with private rental affording women and their children greater stability.

In its response to the housing issues raised the Justice Committee stated that it: *“appreciates the importance of the availability of safe and secure housing for victims of domestic violence and abuse, the absence of which often prevents them from leaving an abusive relationship and wants to see the issues outlined in the evidence addressed. While the Committee explored the potential for an amendment to place a duty on the Housing Executive and/or the Department for Communities in relation to this matter it is aware that housing matters are beyond the reasonable limits of the Domestic Abuse and Family Proceedings Bill’s collective purposes. The Committee therefore welcomes the commitment from the Minister for Communities to review the position in relation to secure tenancies and if necessary, take forward any legislative changes within this mandate.”*⁵¹

⁵¹ Report on the Domestic Abuse and Family Proceedings Bill, Committee for Justice, Northern Ireland Assembly, October 2020

2.6.3 Social Housing

The number of households in priority need of social housing in Northern Ireland is at the highest level on record. In March 2019 there were 38,745 applicants on the social housing waiting list and of these 27,745 were in 'housing stress'.⁵² This can have particularly negative impacts for women, LGBTQI+, BAME and disabled people leaving them unable to access suitable housing. In terms of gender statistics show that more women are social housing tenants (23%) than men (12%).⁵³ Changes to social housing therefore have a disproportionate impact on women who are overrepresented among those in housing need and among social renters.⁵⁴

As previously outlined insufficient social housing stock can have serious implications in domestic violence situations leaving victims trapped in coercive and abusive situations as they have nowhere to go. The situation is even worse in rural areas where there is even less social housing available in the locality and victims are reluctant to move their children from local social networks and schools. The social housing sector already understands how domestic abuse presents and the impact it has on victims the majority of whom are women. This model of housing provision is therefore important and any move away from this model of provision will be detrimental for victims and survivors of domestic abuse.

2.6.4 CEDAW

The UK ratified the Convention on the Elimination of all forms of Discrimination against Women (CEDAW) in 1986 and by doing so committed to the articles, rights and procedures within it.⁵⁵ CEDAW is an international human rights treaty which requires the State Parties to undertake legal obligations to respect, protect and fulfil women's

[Committee for Justice - Report on the Domestic Abuse and Family Proceedings Bill \(niassembly.gov.uk\)](https://www.niassembly.gov.uk/Committee-for-Justice-Report-on-the-Domestic-Abuse-and-Family-Proceedings-Bill/)

⁵² Northern Ireland Housing Statistics 2019-20, NISRA & DfC, December 2020
<https://www.communities-ni.gov.uk/system/files/publications/communities/ni-housing-stats-19-20-full-copy.pdf>

⁵³ NIHE House Condition Survey 2016
<https://www.nihe.gov.uk/Working-With-Us/Research/House-Condition-Survey>

⁵⁴ Housing and gender, Briefing from the UK Women's Budget Group on the impact of changes in housing policy since 2010 on women, November 2017
[Microsoft Word - housing pre-budget nov 2017 final.docx \(wbg.org.uk\)](https://www.wbg.org.uk/Microsoft-Word-housing-pre-budget-nov-2017-final.docx)

⁵⁵ Convention on the Elimination of All Forms of Discrimination against Women
<https://www.un.org/womenwatch/daw/cedaw/text/econvention.htm#intro>

human rights. It is important that the Department takes into consideration the binding obligation on governments which ratify the Convention. CEDAW calls for improved protections in relation to domestic violence in all respects including housing.

In its latest recommendations to the UK government CEDAW recommended that effective measures were taken to ensure that women in vulnerable situations have effective access to housing so they do not need to resort to prostitution or 'sex for rent'.⁵⁶ The Committee also recommended that the UK government should take measures to enable asylum-seeking and refugee women to access appropriate housing.⁵⁷

The CEDAW Committee also reiterated its concerns about the disproportionately negative impact of austerity measures on women and that these measures have resulted in cuts in funding to specialised services for women. It recommends that measures are taken to mitigate and remedy the negative consequences without delay.⁵⁸

2.7 Housing Data

A recent report by the Expert Advisory Panel on a Gender Equality Strategy⁵⁹ highlighted the challenge faced by a lack of robust, disaggregated data. This report referred to data gaps across a range of areas for many of the Section 75 groups including gender. The expert panel stressed that *"this is an issue of critical concern and one which requires urgent action."* This is an important consideration within this Housing Supply Strategy as having access to relevant, up to date data broken down across the Section 75 groups allows for the evidencing and mapping of inequalities and also the targeting of policies and decision making to where it is needed most.

⁵⁶ Concluding Observations on the eighth periodic report of United Kingdom of Great Britain and Northern Ireland, CEDAW/C/GBR/CO/8, March 2019 (para 36(a))
https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GBR/CO/8%20&Lang=En

⁵⁷ Ibid, (para 56)

⁵⁸ Ibid, (para 18)

⁵⁹ Gender Equality Strategy, Expert Advisory Panel Report, December 2020
<https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-gender-expert-advisory-panel-report.pdf>

As an example we point to the lack of statistics broken down by gender in relation to Universal Credit claimants in Northern Ireland. Universal Credit is a relatively new benefit and yet there is no available data broken down by gender making it difficult to quantify its impact on women. Figures available show that 30% of Universal Credit claimants were lone parents (and we know the majority of lone parents are women).⁶⁰ Universal Credit includes help with housing costs and therefore a full analysis of this benefit is vitally important in terms of housing costs issues. This must be a priority for the DfC to ensure that detailed data on Universal Credit claimants is available to help determine the extent and nature of the help being given for meeting housing costs.

3.0 Summary of Focus Group Feedback

Question 1a. What are the three main barriers for your target group in accessing suitable housing supply? Has the pandemic exacerbated any of these barriers and if so, how?

Answer 1a. Summarise key points and specific evidence/examples.....

Barrier 1: Getting housing which is suitable for their needs (sufficient bedrooms, type of property for children/families, those with disabilities, proximity to schools, transport, amenities).

Barrier 2: Housing affordability issues for women who tend to earn less over their lifetimes. Many have to make the choice not to work if they are in low paid work as they would not be able to meet their housing costs without help.

Barrier 3: Cost/conditions/precarity in the private rented sector.

Impact of the pandemic?

The pandemic has created an issue in terms of the ability for people to get repairs carried out particularly in the social sector. This was because the housing agencies would not come into people's homes during lockdown. People were being told that unless it was life threatening or serious that it wouldn't be fixed.

⁶⁰ Universal Credit: Northern Ireland, DfC & NISRA, May 2021
[NI Universal Credit Statistics Feb 2021 \(communities-ni.gov.uk\)](https://communities-ni.gov.uk/northern-ireland/universal-credit-statistics-feb-2021)

This left people living in unsatisfactory housing conditions for considerable periods of time.

What women said:

"Many women have to make the choice not to work. If you were to pay your rent and manage a house even with one child you would not be able to manage on low wages. The numbers just don't add up. The incentive is not there and it is just not worth it for many women."

"For women who are paying rent they need to be earning a wage that allows them to pay their rent and be able to live."

"If you take a job and pay rent to a landlord you are never going to make it especially if you are low paid and especially if you are a woman. How are you going to be able to pay for childcare and full rent on low pay? It's impossible!"

"They seem to be using Covid as an excuse for delaying repairs to properties. This is making things worse. My shower was leaking through the electrics. When I phoned NIHE about it they asked me was it life threatening. I told them that there was water around the electrics. It took 5 weeks to get it fixed. I was told if it is not dangerous just wash at the sink until it gets fixed. I was 5 weeks without a shower."

"I pay £500 for a two-bedroom house in the Woodstock. It is expensive here because it is near the schools and shops. Woodstock and Cregagh are in high demand as everything is in easy reach – shops for clothes and food."

"My daughter is in a house with no back garden just at the front but she can't let her children out to play at the front because it is too dangerous. It is on a busy road and the cars go very fast."

"They need to build more housing for families not just apartments for single people."

"Suitability is not just about the condition of the property it is about whether it is suitable for your needs. There are people who have had family homes whose children are now grown up and they are still here but they don't need all the room and could move to a smaller property. But they have stayed there all their lives and don't want to move."

"Private rentals are expensive. Young professionals come into an area and push up the rents for everyone. There needs to be more housing available for those on lower incomes."

"I am in private rented accommodation. I am a single parent with two children a boy aged 10 and a daughter aged 7. We have a 2-bedroom house and my son and daughter have to share a bedroom. They need two separate rooms, my son has specific needs and it is not good for them to be sharing. I looked into getting

on the housing waiting list but I could only get 14 points for overcrowding so I have no chance of getting anything.”

“I need to stay in this area because the kids are in school here and I don’t drive or have a car.”

“My landlord is awful I never see him it’s all done through a letting agent. There is a hole in the children’s bedroom ceiling and it has been leaking. The living room has damp all over it. The window in the children’s bedroom was rotten and the glass was loose in it so they came out and just screwed it shut. So I couldn’t open the window and it was a fire hazard. After a few months of complaining they eventually came and replaced it.”

“In this area (Woodstock Road) you have to have loads of points to get a social house. I need a social house. In the private rented sector you are not allowed to do anything to the house so it is not my house, it is not a home, you are not allowed to decorate, etc.”

“I am new to the area and have been in private rented sector accommodation since I came here. When you have children in private rented accommodation they should check that the house is suitable for families and children. My door has a single pane of glass the whole length of it at the bottom of the stairs and the banister is dangerous - it is not suitable or safe with children. They need to check the suitability of properties for young kids.”

“I basically had to threaten my landlord to get them to do anything. I had problems with damp on a wall and couldn’t get my landlord to do anything so had to phone environmental health.”

“They don’t care about single parents, they really do need housing suitable for their needs.”

“Private housing should not be allowed to charge high rents.”

“You have to fight to get anything – you have to push all the time, nothing is easy [referring to private rented sector housing].”

“Covid has meant that if it’s not life threatening it won’t be fixed.”

Case Study – Women’s Centre Derry

A Syrian refugee family have been living in temporary accommodation in a 2-bedroom flat for over 5 years. They have one child who is severely disabled and on the autistic spectrum. The family’s health and safety is compromised in the flat which is tiny, in poor repair and has significant damp problems. The family have supporting letters from their health visitor, social worker and educational psychology to underline the fact that their child who is aged 4 has been diagnosed with special needs. The child has no space to play in the flat or outside as the flat faces on to a carpark. The kitchen and living room are all in one space. The stress and anxiety caused by living in these conditions are immense over a 5-year

period. This family also had to shield during lockdown in this tiny flat and the impact of their housing situation caused much distress especially during this time. The family need support to negotiate with the NI Housing Executive as to date they feel that they have been ignored.

Question 1b. What are the three main opportunities that would support your target group in accessing suitable housing supply? Has the pandemic identified new ways of doing things?

Answer 1b.

Opportunity 1: The availability of more social housing and a fairer method of allocation.

Opportunity 2: Greater regulation of the private rented sector to ensure that people are protected from excessive housing costs, poor conditions and that they have greater security of tenure.

Opportunity 3: Greater support for those on the lowest incomes with housing costs including increased support through the benefits system.

Impact of the pandemic?

The women we spoke to could not identify how the pandemic had identified new ways of doing things. Instead they spoke about rising community spirit and action within local communities where neighbours looked out for neighbours and made sure that those who were struggling had help and support. This came more through local community action than through government agencies.

What women said:

“It would help if there were more houses available and they didn’t discriminate against people with no rental experience.”

“Everybody deserves access to housing. You can go on the housing list but putting your name at the bottom of a list with thousands of people on it is no good. It is no good if you are never going to progress on it.”

“The government should step in and not allow private landlords to charge too much. It is scandalous what some people are being charged. In this area it is anywhere from £500 - £650 a month.”

“I need a new house but can’t get anywhere near enough points. I’m in private rented. If I didn’t pay my rent they would have to kick me out and then maybe I would get enough points. I would have to make myself homeless and go to a hostel with my 2 children and I don’t want to do that.”

“Private rented sector doesn’t care they just want someone in and get their money. There should be some kind of enforceable penalty so that properties are suitable for the people who live there.”

“They need to change the points system it is not working.”

“Half my wages are gone on rent in the private rented sector, they are gone immediately on housing. That means I have to live on half my wages for everything else – transport, food, utilities and it’s a struggle.”

“I am not eligible for social housing because I’m single, I work, I have no dependents and no disabilities. I work full time and get no help with my rent so I struggle in the private rented sector. I will never get on the housing market because I can’t get a deposit together on my wages and social housing is set up in a way that it doesn’t apply to me.”

“You have no security in the private rented sector. There are not the same protections as the social sector.”

“Rents can be £550 to £600 a month in this area. This is a massive amount out of your wages. Even a two-bedroom flat can be £130 - £150 per week.”

“Social housing gives you protections. You can’t just be evicted or get a phone call saying your landlord is going to sell the place and you have to be out in a few weeks.”

“I am working and doing what the Government wants but I don’t get any reward for this. I get no help with my housing costs. I also provide care for my brother to give my parents a break but because I am not a formal carer I do not get recognised for this or get any help. I need a two-bedroom house so that I can help to look after my brother but I can’t get any help with this. There are a lot of people like me who are working poor and need help. I feel that I am discriminated against because I work.”

“I understand that you just can’t go on the waiting list and get a house straight away. But if they told you there was a 3 year waiting list maybe you could wait. The way the points system is set up now though I’ll never move up that list.”

“Two sets of flats are being demolished in the estate – where are all those people going to go? They are going to be going on the housing list ahead of everyone else.”

Case Study - Falls Women’s Centre (recorded with ‘Kate’ (not real name) in attendance

Kate is a single mother of two children from West Belfast, in 2015 she left her family home with her two children after suffering 22 years of domestic violence and financial control. Kate explained that one of the reasons she did not leave earlier

was that she did not know or understand how to, “go about getting a new home for her children”. Kate went to Falls Women’s Centre (FWC) for advice and support, eventually she opened up and spoke of her situation. She was supported in getting welfare benefits for her and her children and presented herself to the Northern Ireland Housing Executive (NIHE) as homeless. The NIHE were initially not quick to respond to her need and she found herself continuing to live at the family home whilst maintaining contact with NIHE. Their explanation for not rehousing them was housing shortage. After FWC’s Family Support Worker attended an interview with Kate in the NIHE and explained her circumstances, she was immediately given a place in a hostel in North Belfast. It must be noted that had Kate not had the support and experience of the Family Support Worker, she would have continued to be in her situation as she found it difficult to explain her circumstances, she was stressed, suffering from anxiety and did not have the confidence to challenge the NIHE.

Kate was in the hostel for 11 weeks before getting a ‘single let’ in West Belfast and she has been in this single let since then with no sign of getting her own home. One of the major problems that Kate is facing is that when she moved into the single let, her children were aged 7 and 16, Kate herself was 51 and now six years on her eldest is now a young adult and youngest a teenager. In those six years her points have not moved and the future looks very much like that Kate will never be a high priority for a home of her own. Kate continues to attend FWC. Her mental health has greatly deteriorated, she is receiving counselling for past trauma and her biggest fear is that should something happen to her, her children may well be homeless.

Kate would like to state that; “the current points statement is not suitable for all and it can greatly put women and their families at a disadvantage.” She also states that in terms of domestic violence this is an issue for NIHE, there is no follow up when they house you, for example; the area they put you in, checking to see if you and your family are safe and checking on the children’s welfare. In terms of hostels she also states there is a lack of support for women affected by domestic violence.

Case Study – Chrysalis Women’s Centre

“I am in my 30s and I have a young son aged 4. I work part time for 20 hours a week and receive Tax Credits. I currently live in my mum and dad’s house with my son. I have been trying to get a house with my partner but I’m having terrible problems because of high demand in this area and the fact I have no rental experience. I have been trying for a couple of years now to get private rented accommodation. I had tried to get on the waiting list for social housing but I’ve only been awarded 50 points so I’ve no chance. How can you get a house if you can’t get the points?

Some of the private rented sector landlords are looking for ten years’ rental experience and some are asking for really big rental deposits.

We are both in stable jobs and can afford the rent on the properties but we just can’t get one. Sometimes I feel that my age and the fact I have a child works against me. Some landlords think because you are young it’s going to be a party house and others don’t want kids. I think there should be a standard process around this so that certain groups are not discriminated against. If landlords can

decide the type of people they want and don't want it leaves certain groups of people down the list. I viewed a property one evening after work, I had all my documents and references ready and by the time the next morning came the house was away. How am I meant to get rental experience when I can't get a rental property? I am sharing a room with my son and he is seeing me getting changed and dressed which is not right especially as he gets older and I'm also not able to live with my partner.

There is huge demand for houses in this area. For one house 7 applications were put forward to the landlord so you have a 1 in 7 chance if you even make it to the applications which are put forward. I've been in a stable job for 12 years so there's no real reason why I can't get a house. I can't understand it. I'm at my wits end. I'm on Property Pal every day checking, touching base with landlords I know but I still can't get a house. I don't know what to do. My son and I are sleeping in the same room, we need somewhere. I don't know what else I'm meant to do."

Question 2. What do you think would help to remove these barriers and take advantage of these opportunities? Can you identify best practice in relation to this?

Answer 2. Summarise key points and specific evidence/examples.....

Solutions to barriers:

- Increase housing supply particularly in the social rented sector.
- Change the current housing allocation system so that it is fairer and gives people a reasonable chance of accessing social housing which is suitable to their needs.
- Consider evidence on existing housing needs (with access to robust statistics) so that supply is increased with those needs in mind, eg, family homes suitable for children, homes suitable for older people, people with disabilities and the necessary infrastructure to support their needs.
- Increased protections in the private rented sector to ensure that people are protected from high housing costs, rent arrears, poor housing conditions and threat of eviction.

Ideas to build on opportunities:

- Carry out an analysis of empty properties to determine how they could be used to increase supply.
- If greater protections are available in the private rented sector it could help help with supply issues but ensure that tenants are protected from excessive costs, disrepair and the threat of eviction.
- Increasing the help available for housing costs through the social security system could enable more people to access a home which is suitable to their needs and which they can sustain in the long-term. This would help to reduce housing stress and help to build local communities.

Best practice?

The women we spoke to struggled to identify examples of best practice. They were able to identify the problems and what needed to be fixed but many of these are longer-term structural issues and inter-connected with other areas such as benefits, low-paid work, infrastructure, etc. This needs an intra- and inter-departmental focus as we have outlined in our response.

What women said:

“They need to stop fighting at Stormont and start working together on important issues like this.”

“They need to build more housing for disabled people and older people.”

“They are fighting over language when people are homeless and others can’t get homes. Fighting over language than the things that really matter.”

“What about all the empty houses – can they not be fixed up and used to help with housing supply?”

“There is an issue with empty houses. There is a house round the corner from me where an elderly lady died. She was NIHE. No one lives in it now but her son comes round and cuts the grass and tidies round it but no one lives in it and it’s been like that for years. As long as they are paying the rent then it can stay like that. It’s not right that it’s sitting there empty – it should be looked into.”

“I think NIHE sold off too many houses – too many have been sold off so now there isn’t enough for the people who need them.”

Question 3. How can housing supply help create and maintain sustainable communities and how can we engage communities more effectively in place making?

Answer 3. Summarise key points and specific evidence/examples.....

Create and maintain sustainable communities

- It is clear that experiencing housing problems whether through affordability, poor conditions, poor infrastructure, etc. causes significant problems for people and can have impacts on their health and wellbeing and that of their families. This has obvious wider implications for local communities especially if there are similar issues in a geographic area. Therefore, good quality, affordable housing supported by decent infrastructure should go a long way in helping to create and maintain sustainable communities.
- Planning for housing supply needs to be cognisant of the needs/difficulties in local communities. Feedback suggests that there is a need to have good

local knowledge of the area. This highlights the importance of local knowledge, research and access to good quality robust data.

- Building and maintaining sustainable communities is not a quick process, it needs time, thought and continued investment.
- There are issues with houses being sold to people outside the area who do not belong to local communities and who are not interested in or invested in the area. Their primary consideration is ensuring the rent is paid not who lives in the house and the possible impacts they may have in the community, for example, through anti-social behaviour, etc.
- In order to have a mix of people within communities the housing supply must be right for all the different types of people who want to live there including housing for children and families, people with disabilities, older people, etc. The drive to build apartments and flats often fails many of these households and can be an inhibitor to the creation of sustainable communities.

Engage communities

- It is critically important to ask for and listen to the views and experiences of those who live in local communities but this must be done in a meaningful way and is not just a 'tick box' exercise.
- It is important that the opinions of local communities are listened to and they can see this reflected in the actions of government departments.
- Women have long been under-represented in decision making and in public life yet their contributions to local communities are immense and often under-rated and under-valued. The Department must consider how to ensure the views of women and those from other Section 75 groups are adequately reflected in their engagement with local communities.
- We point to the guidance produced by WRDA⁶¹ on women at the heart of public consultations for valuable lessons on how engagement should be carried out.

“The impact of poor housing has an impact on local communities.”

“It takes time to build a community – you need to know the area.”

“People are being excluded from the communities they want to live in and feel like they belong to because they can’t pay what it costs to live there even though this is where they want to be.”

“A lot of people’s stress comes from their housing issues. Problems with housing really impact on people and this impacts on local communities.”

“A lot of my anxiety and stress is to do with the house. My daughter has drawn all over the walls of my house with marker – I’m constantly worrying about it. Its’s not

⁶¹ Women at the Heart of Public Consultation, A guide for Public Authorities and Women’s Organisations, WRDA, November 2017

https://wrda.net/wp-content/uploads/2018/10/WRDA_WomenAtTheHeartOfPublicConsultation.pdf

my house. It's a stress factor – if I ever get out I probably won't get my deposit back. I've been in the house 8 years. I would like to do stuff to the house to make it better but I can't. I have to wait all the time if I want something fixed or sorted out. If people were happier in their homes they would be less stressed and less anxious and this would help create better relationships in communities."

"People are coming into the area and buying up homes – but they don't live there so they don't care about the area they just want their rent. They don't care about local communities as long as their mortgage is paid."

"In my street there have been five houses bought by private landlords recently. They don't come from the area. Although the people that rent from them are from here."

"They are not making houses they are making apartments and flats. There are lots of single mothers and children and flats and apartments are not suitable for them. They are not suitable for me. There is no outside space for the children."

"It's never mine [referring to private rented accommodation], that's your security that's your home but I don't have that as it's never mine."

Question 4. Should and how could more shared housing developments be delivered here – e.g., the creation of communities that are mixed in terms of:

- **Community background/ identity e.g., religion, ethnicity**
- **Housing types e.g., housing for those with a disability, older people, other S75 groups⁶²**
- **Housing tenure? Private/ owned homes; Rented – both social and private; and Affordable – e.g., co-ownership,**

What benefits could this achieve?

Answer 4. Summarise key points and specific evidence/examples.....

Should more shared housing developments be delivered here?

How **could** this be achieved? Any **challenges** to this?

Please explain the **benefits** of this?

Women were generally of the view that shared housing is important. Some of the women explained that as long as they were happy in their own home they didn't care who lived near them as long as there were no major issues, eg, with anti-social behaviour, etc.

⁶² The nine **Section 75 Target groups** include: persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation; men and women generally; persons with a disability and persons without; persons with dependants and persons without.

Others talked about a focus on the importance of integrated education but then the children have to go home and live in their segregated areas again. There was a feeling that more choice was needed so that people are not forced back into divided areas again. Shared housing and integrated education brings communities together.

Women welcomed the need for mixed communities including housing that catered for the needs of families and children alongside housing for older people, people with disabilities and for BAME people. It is important to provide good quality accommodation for all different types of people so that certain groups do not feel that they are treated as less than others. This can lead to divisions within local communities and be detrimental to relations between neighbours.

What women said:

"I don't care who I live next door to as long as my house is right."

"I think it's great to have communities that are mixed."

"We [Women's Centre Derry] are working with Syrian families in the area and even the offers of housing sent to them are terrible – they are run down and riddled with damp. It's telling them that's all you deserve, this will do you."

Question 5. Finally, what do you consider are the three or four most important things the Department needs to know about housing supply issues?

Answer 5. Summarise key points and specific evidence/examples.....

- The Department need to consider the issues for women in terms of housing supply as affordability is a key issue for women whose incomes tend to be lower over their lifetimes.
- The Department need to consider the help available with housing costs including through the social security system. Many people on benefits struggle to meet their housing costs and living expenses despite getting help through the benefits system. Others in low paid work struggle to meet their housing costs many of whom get no help at all with these costs.
- The Department need to consider the numbers of people who are ending up in private rented accommodation because they cannot secure housing in the social rented sector and the detriment they are suffering because of this including poor conditions, expensive rents and insecurity of tenure.
- The Department need to consider how they better protect people within the private rented sector if they are unable to increase the supply of social rented sector homes.

Other points arising from the conversation worth noting:

- Need to address affordability and supply issues for people in low paid work.
- Consider the needs of people who provide care but who are not classified as formal carers, eg, someone who provides care for her brother on a regular basis but works full time and provides care as respite for her elderly parents.
- People are often penalised for working – they work and do not get rewarded for this especially if they are in low paid work (they get no other help).
- The points system is often set up in a way that rewards difficult behaviour so that people with problem behaviours often get social homes and get moved about so the problems move about (without addressing the underlying problems such as addictions).

4.0 Specific Questions

We have not attempted to answer all the questions asked in the consultation exercise. Instead we have provided answers below to the questions where we believe we have the necessary information, knowledge and evidence to support our answers.

1. Please confirm whether you are replying as an individual or submitting an official response on behalf of an organisation.

We are responding as the Women's Regional Consortium as outlined in Section 1.

2. Do you agree that a 'Whole System' approach given the challenges is the right one?

We agree that a 'whole system' approach is vital to Housing Supply. We are pleased to see the consultation acknowledge that: *"we must not lose sight of the importance of understanding the needs of people, places and communities when developing the supply strategy and thus its role in Supporting People, Shaping Places and Building Communities."* It is not possible to separate issues around housing supply from other related issues such as poverty, deprivation, access to social security benefits, low-paid and insecure work, access to childcare, transport and health/leisure services. These issues must be considered as part of this Strategy and a lack of action to tackle these societal issues will undoubtedly impact on housing issues. Therefore, cross-

departmental and inter-departmental working is essential in order to effectively transform housing supply in Northern Ireland.

3. Do you agree with the 15-year timeframe proposed for the Housing Supply Strategy?

We agree that a long-term approach to these issues is necessary. Many of the issues around housing supply are longstanding and do not have a 'quick fix'. It is therefore necessary to take a long-term approach to this issue in order that any changes made result in real and long-lasting change which also meets the needs of future generations. We agree with our colleagues in Housing Rights that there should be a Review mechanism within the Strategy to facilitate amendments to the Strategy in response to a changing environment.

4. Do you agree with the proposed vision for the Strategy?

Yes. Having access to a good quality, affordable and sustainable home that is appropriate to the needs of the household is central to supporting people and building communities. We are pleased to see the acknowledgement within the consultation that: *"They are homes not just houses."* This is an important element in supporting people, shaping places and building communities.

5. Do you agree with the following proposed objectives for the Strategy:

(a) Increase housing supply and affordable options across all tenures to meet current and future demand.

We agree that there is an urgent need to increase the supply of good quality, affordable homes across all tenures both now and into the future. In order to do this effectively there must be robust data broken down across the equality groups in order to determine where the current supply issues are and the characteristics of those most in need of housing at present. Access to data is also important in trying to predict future demand and the issues which may impact on future housing needs. Actions in relation to increasing housing supply must be based on the needs identified from analysing this data so that supply is closely matched to the need that exists.

Affordability is a key issue for those on the lowest incomes especially those in receipt of social security benefits or who are in low paid and insecure work. Many of these are women who are more likely to claim social security benefits and more likely to be in low-paid, part-time and insecure work – see section 2.2. Welfare reform and austerity policies have impacted greatly on affordability across a range of areas including housing which also has particular implications for women who have been disproportionately impacted by welfare reform policies. Any future Housing Supply Strategy must be cognisant of these issues and the impact they have on housing affordability.

While we agree there is a need to increase the supply of social housing in Northern Ireland and that this type of tenure is often more suitable to those in certain circumstances such as victims of domestic abuse we are concerned about the protections available for those living in the private rented sector. The private rented sector is playing an increasing role in addressing housing supply and as stated in the consultation it now houses 19% of the population. It is being increasingly relied on to provide housing for those on the lowest incomes. When it is considered that the loss of rented accommodation is consistently one of the top three causes of homelessness in Northern Ireland (14%)⁶³ it is clear that there is a need to focus on affordability and protections within the private rented sector.

In terms of affordability we are fully in agreement with our colleagues in Housing Rights that this goes beyond simply the ability to access a home but to sustain a tenancy. It is vitally important to consider a household's ability to sustain their tenancy over time otherwise further cases of homelessness will result which defeats the objectives of the Strategy.

⁶³ Northern Ireland Housing Statistics 2019-20, NISRA & DfC, December 2020
<https://www.communities-ni.gov.uk/system/files/publications/communities/ni-housing-stats-19-20-full-copy.pdf>

(b) Reduce housing stress and homelessness and improve housing solutions for the most vulnerable.

We are strongly in agreement with our colleagues in Housing Rights that it is key that this objective is to **prevent** homelessness rather than simply to reduce it. As with many other issues prevention is better than cure and prevention is more beneficial in terms of the impact to people and families as well as the financial impact.

We note the consultation highlights some key trends impacting on the housing market including an ageing population and increasing numbers of people with a limiting long standing illness that reduces their ability to carry out day to day activities. These are important issues for housing supply and planning for housing solutions which include provision for older people and for people with disabilities is important in reducing housing stress and improving provision for the most vulnerable.

We also wish to highlight the particular impacts of a decade of austerity and welfare reform policies on women particularly on single parents who have been so negatively impacted by these changes – see Section 2.2. This is an important consideration in relation to reducing housing stress and protecting those considered the most vulnerable including children.

(c) Improve housing quality

In carrying out focus group work around the issue of housing supply a frequently raised concern was the issue of housing conditions. For many women we spoke to the quality of their existing housing (often private rented) was inadequate. Many women reported poor housing conditions which impacted greatly on their wellbeing, their mental and physical health, the health and wellbeing of their children and other family members and their sense of place and community.

The issue of good quality housing is an important consideration for housing supply. For some of the women we spoke to an investment in improving the quality of their existing housing would help to realise the vision of this Strategy. However, work to improve the condition of existing housing must be done in such a way that is timely and of sufficient quality that it has longevity.

We share the concerns raised by our colleagues in Housing Rights about the low standards and high levels of disrepair in the private rented sector and this was reflected in our focus group research with women. Available statistics from both the Northern Ireland Housing Executive (NIHE) and Housing Rights point to issues within the private rented sector. NIHE figures show that the private rented sector had a higher proportion of non-decent homes (10.7% or 14,300 properties) compared to 3.1% of social housing properties.⁶⁴ Housing Rights figures show that between April 2020 and March 2021 they dealt with over 3,200 issues relating to housing conditions of which 71% came from the private rented sector compared to 23% in the social housing sector.

Housing quality is a particular issue in the private rented sector. The experiences of private renters point to the impact which poor conditions in private rented sector properties can have on tenant's ability to manage their budgets effectively and to pay their rent.⁶⁵ Housing Rights advisers found that poor fuel efficiency and condition of properties in general had a major impact on their clients' ability to maintain their tenancies.⁶⁶ Advisers also found that clients who were able to access affordable properties found that months later inefficient heating and poor insulation meant they were spending excessive amounts of money heating their homes.⁶⁷ The impact of these issues was also reflected in the NIHE House Condition Survey 2016 which showed that *"the tenure with the highest proportion in fuel poverty in 2016 was the private rented sector (35,700; 26%)."*⁶⁸

We therefore agree with Housing Rights who have recommended that specific focus is given to improving housing quality in the private rented sector under this objective of the Housing Supply Strategy.

⁶⁴ House Condition Survey, Main Report 2016, NIHE

<https://www.nihe.gov.uk/Documents/Research/HCS-2016-Main-Reports/HCS-Main-Report-2016.aspx>

⁶⁵ Preventing Homelessness and Sustaining Tenancies in the Private Rented Sector: Scoping Project, Dr Martina McAuley, Housing Rights, September 2020

<https://www.housingrights.org.uk/sites/default/files/policydocs/Preventing%20Homelessness%20and%20Sustaining%20Tenancies%20in%20the%20PRS.pdf>

⁶⁶ Ibid

⁶⁷ Ibid

⁶⁸ House Condition Survey 2016, Main Report, NI Housing Executive

<https://www.nihe.gov.uk/Documents/Research/HCS-2016-Main-Reports/HCS-Main-Report-2016.aspx>

(d) Ensure the provision of housing options that contribute to the building and maintaining of thriving, inclusive communities and places.

The Women's Regional Consortium agrees with this objective and the need to invest in and develop local communities. Women are often at the forefront of community development work yet their voices are often under-represented despite fulfilling an important role in building inclusive communities: *"women dominate the field of community development contributing to peace through capacity-building and other bottom-up practices."*⁶⁹ The Department should take account of the need to promote equality for all Section 75 groups experiencing inequality.

(e) Support the transition to carbon neutrality by reducing whole-life carbon emissions from both new homes and existing homes.

The Women's Regional Consortium support efforts to achieve carbon neutrality in both new and existing homes. This must be subject to the principles of 'just transition' where the shift to a new, greener economic model promotes social justice rather than undermines it. We believe that there is a need for gender proofing within this just transition to ensure that men and women benefit equally.

6. The terms good quality, sustainable and affordable mean different things to different people - how would you define these terms?

Good quality – we support Housing Rights serious concerns about the current Fitness Standard and also encourage the Department to replace this outdated standard with one which is fit for purpose.

Sustainable – we refer the Department to the research carried out by Housing Rights on Preventing Homelessness and Sustaining Tenancies in the Private Rented Sector.⁷⁰ This research contains information about barriers to sustainability including

⁶⁹ "Wee Women 's Work:" Women and Peacebuilding in Northern Ireland, Amanda E. Donahoe, University of Denver, August 2013

<https://www.nirwn.org/wp-content/uploads/2016/12/Wee-Womens-Work-Women-and-Peacebuilding-in-Northern-Ireland.pdf>

⁷⁰ Preventing Homelessness and Sustaining Tenancies in the Private Rented Sector: Scoping Project, Dr Martina McAuley, Housing Rights, September 2020

<https://www.housingrights.org.uk/sites/default/files/policydocs/Preventing%20Homelessness%20and%20Sustaining%20Tenancies%20in%20the%20PRS.pdf>

the impact of prioritising rent payments, the impact of welfare reform, insecure unemployment, issues with fuel efficiency, the lack of an established dispute resolution process for arrears and the impact of relationship breakdown.

As previously stated we agree with Housing Rights belief that the definition of sustainable housing should include the ability of households to sustain their tenancy over time. This must include considerations such as affordability and any additional support needs the household may have.

Affordability – we would suggest that affordability cannot be separated from issues around housing conditions. While someone may be able to afford a home (often with help through the social security system) they may be unable to continue to afford it if they are struggling to heat it due to issues with fuel inefficiency and insulation. Housing Rights research⁷¹ previously referenced highlights this issue.

The issue of affordability is strongly connected with the help available through the social security system. As previously stated in section 2.6.1. cuts to housing benefits over the last decade paid at the LHA rate have had an impact on affordability and this has been an issue for certain groups such as lone parents who are predominately women. Research has shown that welfare reform changes introduced over the last decade have impacted more on women (see section 2.2) and women are more likely to be in low paid, part-time and insecure work which affects their ability to afford housing. All these factors must be taken into account when considering affordability.

We would suggest that this points to the need to consider a definition of affordability that takes into account the ability of a person to afford the basic necessities of life such as food, utilities, childcare, transport, etc. after paying their housing costs. As the Nevin Economic Research Institute highlight *“housing costs take-up a large share (and in many cases is the single biggest expenditure) of the household budget the cost of*

⁷¹ Preventing Homelessness and Sustaining Tenancies in the Private Rented Sector: Scoping Project, Dr Martina McAuley, Housing Rights, September 2020
<https://www.housingrights.org.uk/sites/default/files/policydocs/Preventing%20Homelessness%20and%20Sustaining%20Tenancies%20in%20the%20PRS.pdf>

*one's housing has the potential to affect a wide range of other outcomes.”*⁷² NERI describes a ‘residual income measure’ which defines housing as affordable if a household is able to afford to meet their other essential needs after paying for the cost of housing.⁷³

7. What do you believe are the three main barriers to delivering the objectives for the strategy?

- We believe that decisions around housing supply should be based on objective need. This requires the availability of robust disaggregated data in order to determine where the need exists and this data is often not readily available – see further in section 2.8.
- As previously outlined there is a need for intra-departmental and inter-departmental working in order to deliver the objectives for the strategy. The strategy must acknowledge the impact of other policies on housing supply, for example, welfare reform.

We support the call by our colleagues in Housing Rights for a standalone Housing Outcome to be included in the Programme for Government and for this Strategy to be adopted at Executive level. This would ensure that relevant Departments and statutory bodies allocate time and resources to deliver the objectives within the Strategy.

- We believe that there is a need to provide greater emphasis on the issues that exist within the private rented sector within this Strategy. Issues with the private rented sector including affordability, conditions, security of tenure and protections for tenants mean that many people, particularly those on the lowest incomes, struggle to find and keep a home within this sector. This is evidenced by loss of rented accommodation being one of the top three reasons for homelessness. In order to meet the vision outlined in the Strategy that “every

⁷² Housing Provision in Northern Ireland and its Implications for Living Standards and Poverty, NERI Working Paper Series, 2017/No 52, April 2018

https://www.neriinstitute.net/sites/default/files/research/2019/neri_working_paper_housing_final.pdf

⁷³ Ibid

household has access to a good quality, affordable and sustainable home that is appropriate for its needs” it will be necessary to prioritise work in the private rented sector.

We are in agreement with our colleagues in Housing Rights that there must be increased focus within the Strategy on both preventing and alleviating homelessness and addressing issues with standards, regulation and security of tenure in the private rented sector. We support Housing Rights in their belief that a failure to do so would prove a major barrier in meeting the objectives of the Strategy.

Sustainable Communities and Homes

10. How can housing supply help create and maintain sustainable communities?

Access to good quality, affordable housing is vitally important for maintaining sustainable communities. Feedback from focus group research with local women showed how problems with housing can really impact on people which in turn has impacts on local communities – see section 3.0.

As the Women’s Budget Group states: *“Housing is a core aspect of people’s lives and it determines many other aspects: who they interact with, their social networks, their community involvement and their job and education opportunities.”*⁷⁴ Issues with poor housing conditions, housing instability, insecurity of tenure and struggling with high housing costs can also impact on people’s health and wellbeing and can have significant negative impacts on both physical and mental health which has obvious implications for local communities.

11. How do we engage communities more effectively in place making?

We would encourage the Department to ensure the increased and effective engagement of women in place making and in the creation and maintenance of

⁷⁴ Creating a Caring Economy: A Call to Action, Commission on a Gender Equal Economy, Women’s Budget Group, September 2020
<https://wbg.org.uk/wp-content/uploads/2020/10/WBG-Report-v10.pdf>

sustainable communities. Women have a long history of involvement in community development work yet their voices are rarely heard in terms of policy and decision making.

We refer the Department to the guidance on consulting with women produced by Women's Regional Consortium members WRDA.⁷⁵ This guidance contains five top tips based on the many years of experience that women's groups have in promoting women's participation in public policy making. These include the need to work together with the women's community and voluntary sector, making time for accessible face to face engagement, keeping language accessible and relevant, listening to the stories from women and making women visible in the product as well as the process.

A gender-neutral approach to policy and decision making has been the standard across Government and this has not served women well as it fails to take account of the different experiences of men and women as a result of existing gender inequalities. A failure to account for these gender dynamics means that the design of policies and budgets can aggravate existing gender inequality and may not benefit women and men equally.

The CEDAW Committee has cautioned on the dangers of gender neutrality. CEDAW calls for substantive equality⁷⁶ to go beyond paying lip service to gender mainstreaming and demonstrate the meaningful integration of an equalities perspective into all systems and policies. It states that a purely formal approach is not sufficient to achieve women's equality with men and requires that women are given an equal start and empowered by an enabling environment to achieve equality of results. *"It is not enough to guarantee women treatment that is identical to that of men. Rather, biological as well as socially and culturally constructed differences between women*

⁷⁵ Women at the Heart of Public Consultation, A guide for Public Authorities and Women's Organisations, WRDA, November 2017

https://wrda.net/wp-content/uploads/2018/10/WRDA_WomenAtTheHeartOfPublicConsultation.pdf

⁷⁶ General Recommendations Adopted by the Committee on the Elimination of Discrimination against Women, Thirtieth session (2004), General Recommendation No 25

https://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/1_Global/INT_CEDAW_GEC_3733_E.pdf

and men must be taken into account."⁷⁷ The issue of gender neutrality is a significant barrier to women's equality and this issue must be recognised by the Department in this Strategy.

14. To what extent do you agree that it should be a priority to deliver more shared housing developments throughout NI?

In our focus group research some of the women highlighted the desirability of shared housing. They discussed that there is a focus on the importance of shared education in Northern Ireland but then children go back home to live in siloed housing. Some of the women felt that there was a need for more choice so that people are not forced back into divided areas again. Shared housing and integrated education helps to bring communities together and they work together to achieve this. The result of a lack of shared housing could in effect undo some of the important work on bringing communities together which comes from integrated education.

In other focus group discussions women stated that they did not care who their neighbour was as long as they were living in good quality, suitable, affordable accommodation and there were no significant issues with their neighbours, eg, anti-social behaviour, etc. There was a general agreement that shared housing was a positive thing and that successful shared housing developments would result from having access to good quality, affordable housing that met the needs of those who lived there.

16. To what extent do you agree that housing should be an integral part of the care and support system?

We believe strongly that housing is an integral part of the care and support system. As the Women's Budget Group states: *"The guarantee of a safe, warm, accessible, good-quality and energy efficient place to call home is a crucial element of a caring economy. It simultaneously contributes to gender equality, wellbeing and sustainability."*⁷⁸

⁷⁷ Ibid, paragraph 8

⁷⁸ Creating a Caring Economy: A Call to Action, Commission on a Gender Equal Economy, Women's Budget Group, September 2020
<https://wbg.org.uk/wp-content/uploads/2020/10/WBG-Report-v10.pdf>

Housing policy over the last few decades has focused on encouraging and subsidising home ownership which tends to target people with relatively high incomes. It is time for this to change and for policy and funding to be targeted to those in the greatest need. This would help to ensure that everyone is able to access a safe, warm, affordable home.

There is a need to invest in energy-efficient, affordable housing which is adapted to care needs and which also reflects the fact that women have lower average earnings. Ensuring housing affordability for those on the lowest incomes and for many people with care needs is so connected to the help available through the social security system. There is a real need for the social security system to provide proper support to protect people from homelessness and ensure that they can afford the basic necessities of life including housing.

Equality and Human Rights

20. The Equality Commission has framed local housing demand and supply in relation to three constructs – accessibility; adequacy; and sustainability. Are you content with this framework or are there other issues that may warrant inclusion?

We are in agreement with these constructs provided these are fully defined as these words can be subject to interpretation.

21. In addition to the inequalities or data gaps already identified in the Equality Commission's Statement and the Wallace Report, are there any other issues that should be considered?

Yes, we believe that the impact of austerity and welfare reform on women should be considered. Research shows that 86% of the savings to the Treasury through tax and benefit changes since 2010 will have come from women.⁷⁹ Locally, Northern Ireland Human Rights Commission (NIHRC) research⁸⁰ showed that across most income

⁷⁹ Estimating the gender impact of tax and benefit changes, Richard Cracknell, Richard Keen, Commons Briefing Papers SN06758, December 2017
<http://researchbriefings.files.parliament.uk/documents/SN06758/SN06758.pdf>

⁸⁰ Cumulative impact assessment of tax and social security reforms in Northern Ireland, NIHRC, November 2019

levels the overall cash impact of the reforms is more negative for women than for men. This is particularly the case for lone parents (who are mostly women) who lose £2,250 on average, equivalent to almost 10% of their net income.

22. In relation to the issue of using multivariate analyses (Multivariate analysis is analysis that considers the impact of more than one Section 75 characteristic), are you aware of any work already undertaken that would be useful?

The women's sector in Northern Ireland has long stressed the need to consider intersectionality. Intersectionality recognises that individuals can experience discrimination on the basis of multiple and intersecting identities. Disadvantage and discrimination based on gender is inextricably linked to other identities, factors and experiences such as age, race, disability, sexual identity, etc. It is entirely possible for spheres of minority to exist in overlapping forms.

The importance of intersectionality is addressed in a number of international human rights treaties. The International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR) have both addressed intersectional discrimination. The ICESCR has noted that the cumulative disadvantage accrued by individuals or groups of individuals who face discrimination on more than one of the prohibited grounds means that they experience a unique and specific impact which needs addressing.

The CEDAW committee makes frequent reference to intersectionality in its Concluding Observations. In its most recent Concluding Observations for the UK⁸¹ it expresses concern about the limitations of equality legislation to effectively protect women from discrimination, including intersecting forms of discrimination. It expresses concern regarding the lack of systematic collection of data, disaggregated by sex, gender, ethnicity, disability and age, in particular with regard to intersecting forms of

https://www.nihrc.org/uploads/publications/Final_CIA_report_Oct_2019.pdf

⁸¹ Concluding Observations on the eighth periodic report of United Kingdom of Great Britain and Northern Ireland, CEDAW/C/GBR/CO/8, March 2019

https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GBR/CO/8%20&Lang=En

discrimination, which impedes analysis of areas where women lack substantive equality with men and impacts on policy making and analysis of the impact of any measures taken.

The EU Gender Equality Strategy 2020 – 2025 presents policy objectives and actions to make significant progress by 2025 towards a gender-equal Europe. The Strategy pursues a dual approach of gender mainstreaming combined with targeted actions, and intersectionality is a horizontal principle for its implementation.⁸²

Housing Supply in Rural Areas

23. To what extent do you agree that the Housing Supply Strategy should address the need for affordable homes in rural areas?

This is vitally important given the size of our rural population. Northern Ireland has a significant rural population with 36% of the population living in rural areas.⁸³ Research by NIRWN shows that rural women are under increasing pressure from the economic climate leaving them experiencing more poverty and social isolation than ever before.⁸⁴ Rural women are particularly vulnerable to access poverty meaning that they are unable to address their financial poverty if they lack access to affordable childcare and transport to allow them to access better paid, better quality jobs.

Affordable rural housing must also be quality, fit for purpose housing. Housing unfitness remains higher in rural areas. In 2016, 4% of rural housing was unfit compared to 1% in urban areas⁸⁵. Most unfit houses are in private ownership and located in the more isolated rural areas. There was a significant rise in unfitness in private sector housing stock in rural areas from 4% in 2006 to 9% in 2011 and 5% to 14% in isolated rural areas⁸⁶

⁸² https://ec.europa.eu/info/policies/justice-and-fundamental-rights/gender-equality/gender-equality-strategy_en

⁸³ Mid-Year Population Estimates – Urban/Rural Change, NISRA
<https://www.daera-ni.gov.uk/publications/mid-year-estimates-population-change>

⁸⁴ Rural Women's Manifesto, NIRWN, September 2015
<https://www.nirwn.org/wp-content/uploads/2016/12/NIRWN-Rural-Womens-Manifesto.pdf>

⁸⁵ [The Housing Executive - Improving Homes in Rural Areas \(nihe.gov.uk\)](https://www.nirwn.org/wp-content/uploads/2016/12/NIRWN-Rural-Womens-Manifesto.pdf)

⁸⁶ [Rural Strategy & Action Plan 2016 - 2020 \(nihe.gov.uk\)](https://www.nirwn.org/wp-content/uploads/2016/12/NIRWN-Rural-Womens-Manifesto.pdf)

24. To what extent do you agree that community led housing should be supported and enabled in rural and urban areas across NI?

We agree that community led housing should be supported and enabled. There is less existing social housing located in rural areas and/or a large proportion of stock has been sold, people living in these areas are less likely to come forward and register on the social housing waiting list or will register for the nearest town or city where they have a more realistic chance of achieving a home to meet their needs⁸⁷. It is therefore critical to engage local communities to assess the local needs, challenges and barriers.

Community development and empowerment programmes are equally as important in rural areas where social issues can exist, albeit on a smaller scale than in the urban context. Invisible divisions⁸⁸ in rural areas between people of different community background and traditions may limit access to services for residents of some areas or create duplication of services in others. The research suggests that there has been a piecemeal approach to addressing the issue of segregation and division in rural communities and areas beyond Belfast. Support is required to contribute to the development of safe, cohesive and engaged rural neighbourhoods.

25. How can additional innovative multi-agency projects (or approaches such as 'Tackling Rural Poverty & Social Isolation') be created to deliver more affordable housing supply in rural areas?

Networking, collaboration and genuine partnership within and between organisations and different sectors are vital to support rural communities⁸⁹. Multi-agency approaches such as Tackling Rural Poverty & Social Isolation (TRIPSI) have been very effective in the past and are an excellent example of collaborative working between government departments, statutory agencies, local government and rural communities. The Affordable Warmth Scheme is an excellent example of how multi agency approaches are a more effective delivery mechanism. We know that fuel poverty is higher in rural areas with 50% of those living in isolated rural areas facing fuel poverty. The Women's

⁸⁷ [Rural Strategy & Action Plan 2016 - 2020 \(nihe.gov.uk\)](https://www.nihe.gov.uk)

⁸⁸ Rural Communities...Polite avoidance and denial-rhetoric or reality?; Tony Macauley March 2013

⁸⁹ Ibid

Regional consortium would welcome additional innovative multi-agency projects in rural areas.

Housing and Poverty

26. Is there a need for this Housing Supply Strategy to play a role in reducing poverty?

Yes. We wish to stress the need for this Housing Supply Strategy to play a role in reducing poverty. There are clear links between housing and poverty and housing policy has a key role to play in reducing poverty. People's experience of poverty, material deprivation and housing circumstances are intertwined. Housing forms an important part of people's material living conditions and contributes to their life chances.⁹⁰

When it is considered that housing costs make up a large share, and in many cases the single biggest expenditure, of a household budget the cost of housing has the potential to have the most direct impact on poverty and deprivation levels. Research has shown that burdensome housing costs have led many households to reduce their expenditure on other necessities such as food, clothing and healthcare.⁹¹ Overall, in Northern Ireland, 19,000 more people are living in relative poverty in 2018/19 when the impact of housing costs is taken into account.⁹²

Joseph Rowntree research⁹³ has shown that there has been a sharp increase in the proportion of people in the poorest fifth of the population who have to spend more than a third of their income on housing – from 22% in 2003/06 to 26% in 2013/16. This rise has been particularly sharp among social renters. Those with the lowest incomes in both the private and social rented sectors face a much larger cost burden in terms of

⁹⁰ The Links between Housing and Poverty: An Evidence Review, Joseph Rowntree Foundation, April 2013

[The links between housing and poverty | JRF](#)

⁹¹ Housing Provision in Northern Ireland and its Implications for Living Standards and Poverty, Nevin Economic Research Institute, April 2018

[neri_working_paper_housing_final.pdf \(neriinstitute.net\)](#)

⁹² Northern Ireland Poverty Bulletin 2018-19, NISRA

<https://www.communities-ni.gov.uk/publications/northern-ireland-poverty-bulletin-2018-19>

⁹³ Poverty in Northern Ireland 2018, Joseph Rowntree, February 2018

[Poverty in Northern Ireland 2018 | JRF](#)

the proportion of net household income spent on housing costs which is likely to have far-reaching consequences for the income available for other expenditure.⁹⁴

Social Security Cuts in the Private Rented Sector

Statistics show that households with the highest housing costs were in the private rented sector with average weekly rents at £100 per week in the private rented sector compared to £79 in the social sector.⁹⁵ Cuts to housing benefits in the private rented sector have made it increasingly difficult for low income private renters to find and keep their homes. There are more households at risk of poverty after housing costs in the private rented sector in Northern Ireland than in the social rented sector and there are less protections for tenants in this sector. Of those in low incomes after housing costs 31% live in the private rented sector compared to 24% in the social rented sector⁹⁶ with statistics showing that more women are private sector tenants than men.⁹⁷

Research by Housing Rights⁹⁸ shows that renting privately in Northern Ireland is becoming increasingly unaffordable for people who rely on Housing Benefit to pay their rent. The research shows that almost 9 out of 10 rental properties are out of reach for people receiving Housing Benefit with as little as 12% of properties in the sector having their rent fully covered by the amount of benefit available. Over a ten-year period while the number of households renting from private landlords has increased significantly the number of properties available to rent at a level fully covered by Housing Benefit has reduced by 75%. This undoubtedly places low income households under serious financial pressure to afford and stay in their homes.

⁹⁴ Housing Provision in Northern Ireland and its Implications for Living Standards and Poverty, Nevin Economic Research Institute, April 2018

[neri working paper housing final.pdf \(neriinstitute.net\)](https://www.neri.org.uk/working-paper-housing-final.pdf)

⁹⁵ Northern Ireland Housing Statistics 2019-20, DfC & NISRA, December 2020

[Northern Ireland Housing Statistics 2019-20 \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk/system/files/publications/communities/hbai-2018-19.pdf)

⁹⁶ Households Below Average Income: Northern Ireland 2018/19, DfC & NISRA

<https://www.communities-ni.gov.uk/system/files/publications/communities/hbai-2018-19.pdf>

⁹⁷ NIHE House Condition Survey 2016

<https://www.nihe.gov.uk/Working-With-Us/Research/House-Condition-Survey>

⁹⁸ Falling Behind, Exploring the gap between Local Housing Allowance and the availability of affordable private rented accommodation in Northern Ireland, Housing Rights Service, October 2019
[Falling Behind LHA full research Oct 2019.pdf \(housingrights.org.uk\)](https://www.housingrights.org.uk/Falling-Behind-LHA-full-research-Oct-2019.pdf)

As members of the Cliff Edge Coalition we are concerned about protections for low-income private renters impacted by cuts to housing benefits over the last decade paid at the Local Housing Allowance (LHA) rate. Single parents (91% of whom are female) are disproportionately impacted by cuts to the LHA rate and a failure to provide additional support to low-income private renters. By 2019, 45% of single parent households were living in the private rented sector (compared to 23% in 2003).⁹⁹ Single parent households are more likely to be impacted by poverty and are therefore more likely to be in need of support to pay for their housing costs.¹⁰⁰

Single parents are also more likely to live in two-bedroom properties and the rents for these types of properties have increased disproportionately from other types of properties¹⁰¹ particularly at the lower end of the market, which would be the properties which low income single parent households are more likely to occupy. This suggests that single parent households will be more adversely affected by any cuts to the LHA rates.

It is vital that the increasing number of people who live in the private rented sector, many of whom cannot access homes in the social sector, receive the support they need through the benefits system to find and keep their homes.

The impact of the Covid-19 pandemic on the Private Rented Sector

Experts are warning of the need to be aware of the fragile situation many tenants who rent find themselves in, with many facing eviction and rent arrears as we emerge from lockdown.¹⁰² Furthermore, women are likely to be more impacted by this as women with children have been disproportionately affected by reduced hours and earnings as a result of the pandemic.¹⁰³

⁹⁹ <https://www.communities-ni.gov.uk/publications/family-resources-survey-report-2018-2019>

¹⁰⁰ <https://www.communities-ni.gov.uk/publications/households-below-average-income-northern-ireland-201819>

¹⁰¹ Falling Behind, Exploring the gap between Local Housing Allowance and the availability of affordable private rented accommodation in Northern Ireland, Housing Rights Service, October 2019 [Falling Behind LHA full research Oct 2019.pdf \(housingrights.org.uk\)](#)

¹⁰² Fearful time for tenants facing eviction and rent arrears as we emerge from lockdown, View Digital, June 2021 [Opinion: Fearful time for tenants facing eviction and rent arrears as we emerge from lockdown - VIEWdigital](#)

¹⁰³ NERI blog post, August 2020

Further research by StepChange also shows that private renters are most at risk from Covid-19 related arrears and debt with nearly half a million (460,000) private sector tenants behind on rent payments. Since March 2020, half (49%) of private renters have experienced a drop in income.¹⁰⁴ Locally, Housing Rights research¹⁰⁵ suggests that those in the private rented sector have been disproportionately impacted by the pandemic. Private rented sector contacts to Housing Rights in 2020 in relation to affordability, Notice to Quit/evictions showed a marked increase from pre-pandemic levels.

Joseph Rowntree Foundation research¹⁰⁶ also shows that renters are faring worse than homeowners. A fifth of renters (20%) are worried about paying rent or mortgage over the next three months compared to one in ten (10%) of those buying with a mortgage. Joseph Rowntree has highlighted that the proportion of low-income renting households in arrears compared to those on higher incomes paints a worrying picture of a two-tier recovery. More than one in four (27%) of renting households with gross annual income under £25,000 per annum are in arrears with general household bills which is significantly higher than the 7% of households with gross annual income over £50,000 per annum. In terms of rent arrears 8% of lower-income households report being in rent arrears, versus 1% of households with income over £50,000. Statistics for Northern Ireland show that more women are private rented sector tenants compared to men.¹⁰⁷

Universal Credit and Housing Arrears

The introduction of Universal Credit has seen help for housing costs included within this single benefit. Latest statistics show that in February 2021, 43% (23,460) of

<https://www.neroinstitute.net/blog/womens-livelihoods-must-not-be-sacrificed-after-lockdown>

¹⁰⁴ Covid Debt Rescue, Emergency support for renters to keep their homes, StepChange, March 2021

[covid-debt-rescue-report-stepchange.pdf](https://www.covid-debt-rescue-report-stepchange.pdf)

¹⁰⁵ The 'Perfect Storm': The impact of Covid-19 on private renters in Northern Ireland, Housing Rights, November 2020

[https://www.housingrights.org.uk/sites/default/files/The Perfect Storm research.pdf](https://www.housingrights.org.uk/sites/default/files/The%20Perfect%20Storm%20research.pdf)

¹⁰⁶ We can't allow renters to be locked out of our post-pandemic recovery, Joseph Rowntree Foundation, May 2021

[We can't allow renters to be locked out of our post-pandemic recovery | JRF](https://www.jrf.org.uk/publications/we-cant-allow-renters-to-be-locked-out-of-our-post-pandemic-recovery)

¹⁰⁷ NIHE House Condition Survey 2016

<https://www.nihe.gov.uk/Working-With-Us/Research/House-Condition-Survey>

households receiving a payment of Universal Credit with entitlement to support for housing were in the social rented sector, compared to 56% (30,230) in the private rented sector.¹⁰⁸

Women's Regional Consortium research with local women¹⁰⁹ clearly shows the negative impacts of Universal Credit in particular around the five-week wait (see section 2.2.1). Along with our colleagues in the Cliff Edge Coalition we have called on government to introduce new local mitigations to help alleviate the impact of the Universal Credit five-week wait (see section 2.3).

The Universal Credit five-week wait has caused issues with housing arrears. There is strong evidence that one of the most immediate impacts of the wait for the first payment is household debt.¹¹⁰ StepChange reports that the five-week wait for the first payment led almost all their clients affected (92%) to experience some form of hardship or financial difficulty.¹¹¹ Their survey research on the wait for the first Universal Credit payment showed that 47% had fallen behind on their rent or mortgage repayments.

In Northern Ireland there has been a rise in arrears caused by the five-week wait in the social rented sector. In 2018/19 the average arrears for Northern Ireland Housing Executive tenants on Universal Credit was £700.05, compared to an average of £191.82 for Housing Benefit claimants.¹¹² These arrears have also had particularly serious implications for those in the private rented sector in Northern Ireland as most

¹⁰⁸ Universal Credit: Northern Ireland Data to February 2021, DfC & NISRA, May 2021
[NI Universal Credit Statistics Feb 2020 \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk/northern-ireland/universal-credit-statistics-feb-2020)

¹⁰⁹ The Impact of Universal Credit on Women, Women's Regional Consortium, September 2020
<http://www.womensregionalconsortiumni.org.uk/sites/default/files/The%20Impact%20of%20Universal%20Credit%20on%20WomenRevised.pdf>

¹¹⁰ Hardship Now or Hardship Later? Universal Credit, Debt and the Five Week Wait, The Trussell Trust and StepChange, June 2019
https://www.trusselltrust.org/wp-content/uploads/sites/2/2019/09/PolicyReport_Final_ForWeb.pdf

¹¹¹ Problem debt and the social security system, StepChange, January 2020
<https://www.stepchange.org/Portals/0/assets/pdf/social-security-mini-brief-report.pdf>

¹¹² Statistics provided by Northern Ireland Housing Executive Welfare Project Team on 14/05/19 and quoted in Cliff Edge NI Coalition's Submission to the Joint Inquiry into Welfare Policy in Northern Ireland, May 2019
https://www.housingrights.org.uk/sites/default/files/Cliff_edge_NI_Coalition_response_westminster_inquiry-welfare-policy-NI.pdf

private landlords only have one or two properties¹¹³ and are therefore much less likely to be able and willing to withstand arrears of this level.

Research by the Women's Regional Consortium¹¹⁴ showed that the Universal Credit five-week wait had caused a number of the women to experience arrears with their housing payments. For those in private rented accommodation this was particularly worrying due to a lack of security of tenure and fears of eviction.

The numbers of people claiming Universal Credit are likely to continue to rise even further as a result of the recession arising out of the pandemic and the fact that many people will be unable to get work due to economic constrictions (see section 2.5). This will mean more people, including many women, relying on Universal Credit to provide for themselves and their families and will put a focus on the ability of Universal Credit to enable families to meet their housing and other costs.

“It’s degrading. I’ve worked my entire life and due to illness I had to go on Universal Credit. I’m hoping after I receive my surgery I can return to work as I hate having to wait every month to see how much I will be paid. It’s impossible to budget as you only find out a few days before payday what you’ll get and in some months I’ve received nothing. I’m in arrears with my rent. It’s very stressful.”

“The five-week wait was horrendous. I sold my sofa and had to borrow as well. I got an Advance Payment but had to pay my rent since it didn’t get covered for the month when I changed from Income Support to Universal Credit so I was left with £50. It feels as though you’re being punished and just made to struggle when you most need the help.”

“I still owe for my last month of childcare. There was a date to pay by and send in the payment receipt but I did not have the money to pay it then as my last wages went to my rent. I did not want to be homeless as I’m in private rental. I lived off food banks and loans until I got the payment.”

¹¹³ 84% of private landlords in Northern Ireland own 1 or 2 properties, Department for Communities' Landlord Registration Scheme

¹¹⁴ The Impact of Universal Credit on Women, Women's Regional Consortium, September 2020
<http://www.womensregionalconsortiumni.org.uk/sites/default/files/The%20Impact%20of%20Universal%20Credit%20on%20WomenRevised.pdf>

“It has left me suffering from severe depression due to debt and having no money. Stress and anxiety with not knowing every month what payment I will receive. The way the payment months work with some months having more weeks than four means that I am now facing homelessness due to rent arrears. So I am now in rent arrears as it's not every four weeks like the old system.”
“I'm in private rented accommodation and moving to Universal Credit caused issues with my landlord – it puts you at risk of being homeless.”

“I am in NIHE property and I keep getting letters about being in arrears, I get a letter every month. Getting letters about arrears makes me depressed – it stresses you out.”

“I'm afraid about not being able to pay my rent – all my landlord has to do is give me a months' notice and I'd be out. I'm worried about being homeless.”

“I can really see the difference living on Universal Credit – I've gone from getting by to really struggling to the point where I don't know if I'll have any electric when I go home. I don't get paid to Friday and I've already exhausted family/friends who I will have to pay back when I get my money. I owe a lot of it already. It has not been a good experience. I didn't know about the Contingency Fund help. I can't get help through Discretionary Support anyway because I'm at my limit. The thing that would have helped me the most is not getting into debt at the start. Universal Credit didn't inform Tax Credits when I made my claim so this caused an overpayment which I'm now having to pay back as well and I'm already struggling. Plus there are issues with arrears on my housing costs. I get a letter from NIHE with an amount of arrears I owe after claiming Universal Credit. I panicked and wondered how I could owe that much. I rang them and asked them not to take it out and they agreed so I just pay it when I can on my rent card. I am constantly in and out of arrears with my rent. I'm trying to figure out if I have the money to pay it this week.”

“I am in arrears of rent because of the wait for Universal Credit and I am having to pay extra to pay this off. I told them I didn't have the money to do this and it took a lot of fighting for NIHE to agree to take a smaller amount each week. My mum is helping me with this, she is paying £5 a week off the rent arrears for me. I was pregnant at the time and worrying about losing my home. The long-term impact of going on to Universal Credit is the debt I am in. I am paying off rent arrears and I had a good credit rating before this but it has gone to the dogs now. I am really struggling on Universal Credit and the initial wait was the hardest bit.”

(Quotes taken from Women's Regional Consortium Research on the Impact of Universal Credit on Women, September 2020)

28. To what extent do you agree that more needs to be done from an interdepartmental perspective to improve the lives and life chances of those who are homeless or at risk of homelessness?

Throughout this response we have reiterated the fact that housing and housing supply issues cannot be removed from wider issues such as gender equality, poor infrastructure, access to social security and welfare reform. We have highlighted the negative impacts of welfare reform and the fact that the social security system is no longer able to provide a safety net for those on the lowest incomes. This leaves them vulnerable to poverty and at risk of homelessness. Problems with Universal Credit have been linked to increased poverty, debt, poor mental health and increased foodbank use. These are major concerns and increase the threat of arrears, evictions and homelessness.

We also note with concern that this October, six million low-income families across the UK currently relying on Universal Credit or Working Tax Credit face an overnight cut to their incomes of £20 a week (£1,040 a year). Many charities, think tanks and leading organisations are urging the Government not to go ahead with this cut, which will further weaken social security support, cause a surge of people being pulled into poverty, and cause severe hardship for families who are already struggling to stay afloat. We argue that these actions by Government have an impact on housing and affordability. Social security must be there to help keep people from poverty, bring greater stability and security and open-up options and opportunities.

Given the links between housing and poverty and the important role that the social security system plays in alleviating poverty and helping with housing costs it is important that there is effective partnership with the social security division within the Department across all these issues. The development of these effective partnerships will be critical to the success of this Strategy.

We reiterate our support for the call by our colleagues in Housing Rights for a standalone Housing Outcome to be included in the Programme for Government and for this Strategy to be adopted at Executive level. This would ensure that relevant Departments and statutory bodies allocate time and resources to deliver the objectives within the Strategy. We also support the call from Housing Rights for a statutory duty

to co-operate on homelessness to be placed on statutory bodies across housing, health, education and criminal justice. This will ensure that bodies with responsibilities in relation to homelessness are able to prioritise their time and resources to tackle this issue and that there will be a framework for these bodies to be held to account for failure to do so.

We believe that it is absolutely imperative that more needs to be done from both an intra-departmental and an inter-departmental perspective to improve the lives and life chances of those who are struggling with housing problems whether that be in relation to affordability, conditions, supply, infrastructure issues, etc.

30. To what extent do you agree that housing plays a significant role in reducing economic inactivity/enabling individuals to take up employment?

Women make up half of the working age population however nearly a third of working age women are 'economically inactive'. The Northern Ireland economic inactivity rate has increased to 27% and it is consistently above the UK average (now at 20.7%). The female economic inactivity rate is 30.9% compared to 23% for men.¹¹⁵ In looking at the detail of economic inactivity it shows that more than a third of women who were unavailable for work gave the reason for inactivity as family/home commitments (61,000 or 34%) and this was the least likely reason for male inactivity (at 8,000 or 6%).¹¹⁶ This is an important consideration for women in terms of the impact of caring responsibilities on their lives and the supports they may need to access training, education or work if that is their wish.

We do also agree that housing plays a role in reducing economic inactivity/enabling individuals to take up employment. Housing affordability issues can mean that for some people struggling to meet these payments that work does not pay. Low-cost housing makes it easier to make work pay enabling people to meet their housing costs and the costs of other basic essentials. This allows them to both afford a home and to stay in it over the longer term.

¹¹⁵ Northern Ireland Labour Market Report, NISRA, January 2021

<https://www.nisra.gov.uk/system/files/statistics/labour-market-report-january-2021.pdf>

¹¹⁶ Women in Northern Ireland 2020, NISRA, June 2020

https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/Women%20in%20NI%202020_0.pdf

Land and Property

33. Are there land & property practices adopted in other UK or European jurisdictions that you believe would transform supply if adopted here?

While not in the UK or Europe we would point the Department to the approach taken in Canada. Government in Canada is increasingly recognising the need to implement policies and programs to further advance gender parity and has signaled a wish to further advance its commitment to feminism and feminist government.

An example given is that provided by the city of Vancouver. It has developed Vancouver: A City for All Women, Women's Equity Strategy 2018 -2028.¹¹⁷ This Strategy aligns with related strategies including Housing Vancouver to take action to increase women's safety and affordable housing and address the impact of the childcare shortage on women's economic participation. The housing goal within the Strategy is to make *"a range of affordable housing choices available for women of diverse backgrounds and circumstances, including single parents, seniors, newcomers, and those facing vulnerable conditions."*

The Strategy has set goals to create 12,000 social, supportive and non-profit co-operative homes, including 6,800 new homes for households with incomes below \$30,000 per year. At least half of all new housing in the next 10 years will be for renters and 40% of new homes will be large enough for families.

They have created a requirement that all rezoning development applications include a minimum of 35% family units (two and three bedroom units) and work collaboratively with provincial and non-profit housing partners to support the delivery of housing for women and families through grants and provision of land for social housing. Through grants, partnerships, and direct outreach, they provide homeless and under-housed residents with shelter, free or low-cost food and other services and resources.

¹¹⁷ Vancouver: A City for All Women, Women's Equity Strategy 2018 – 2028, City of Vancouver [Women's Equity Strategy 2018 \(vancouver.ca\)](https://vancouver.ca/women-equity-strategy-2018-2028)

Planning

35. Are there planning practices adopted in other UK or European jurisdictions that you believe would transform supply if adopted here?

See previous answer to Q33.

Infrastructure

41. To what extent do you agree that coordination of housing provision and infrastructure services need to be better aligned?

We strongly agree that coordination of housing provision and infrastructure services need to be better aligned. This is particularly the case for women and even more so for rural women who often suffer from access poverty. As the Women's Budget Group highlights in their paper on Housing and women¹¹⁸ *"Gendered expectations around caring responsibilities, with women usually the main – and often the sole – carer of children, means that women face specific challenges in trying to secure accommodation suitable for them and their families. Surrounding infrastructure such as good local transport links, proximity to schools, health centres and supermarkets or grocery shops are all key for women to be able to combine unpaid work with paid employment."*

The combination of long standing structural inequalities and a lack of infrastructure can create significant barriers for women. Childcare must be acknowledged as one of the biggest barriers that women face in being able to fully participate in all areas of life. Women who often need jobs which are flexible and fit around existing or available/accessible childcare provision. If these jobs don't exist or are inaccessible due to the lack of availability/excessive cost of childcare or transport, then many women will not be able to increase their incomes through paid work. This has obvious implications for affordability in terms of accommodation.

¹¹⁸ A home of her own, Housing and women, Women's Budget Group, July 2019
<https://wbg.org.uk/wp-content/uploads/2019/07/WBG19-Housing-Report-full-digital.pdf>

43. How do we ensure that our housing supply integrates and brings together all the essential infrastructure (hard/soft & critical) required to create thriving homes and communities?

The Department must meaningfully engage with all those living in local communities to integrate and bring together all the essential infrastructure. Those living in local communities are often best placed to understand and identify what is essential in their community. They need to be meaningfully consulted not just as a tick box exercise and consultation should be representative across all the equality groups. We again refer the Department to the guidance on consulting with women produced by Women's Regional Consortium members WRDA.¹¹⁹

Climate Change/Net Zero

45. Transitioning to low carbon homes will require significant behavioural changes by householders. Is support required to aid the necessary behavioural changes?

Yes, support is necessary for those on the lowest incomes and for some of those with protected characteristics such as those with disabilities, BAME groups, older people, etc. to make this transition. As previously referenced any moves to net-zero carbon targets must be subject to the principles of just transition.

Skills

49. To what extent do you agree that the Housing Supply Strategy could act as a stimulus to improve and modernise construction skills and increase the importance of the sector?

“The focus on shovel-ready projects, hard hats and hi-vis jackets suggests a focus on jobs that historically have been more likely to be done by men.”¹²⁰

¹¹⁹ Women at the Heart of Public Consultation, A guide for Public Authorities and Women's Organisations, WRDA, November 2017

https://wrda.net/wp-content/uploads/2018/10/WRDA_WomenAtTheHeartOfPublicConsultation.pdf

¹²⁰ Dr Mary-Ann Stephenson giving evidence to the House of Commons Women and Equalities Committee, Unequal impact? Coronavirus and the gendered economic impact, HC 385, February 2021

[Unequal impact? Coronavirus and the gendered economic impact \(parliament.uk\)](https://www.parliament.uk/business/committees/committees-a-z/women-and-equalities-committee/inequality/inequality-impact/)

While it is possible that the Housing Supply Strategy could act as a stimulus to improve and modernise construction skills and increase the importance of the sector there is a need to consider who will benefit from this. We would be concerned that an emphasis on construction is heavily gendered in nature focusing as it does on a male-dominated sector. This has the potential to create unequal outcomes for men and women and exacerbate existing inequalities.

Women are traditionally under-represented in the construction sector. Latest available figures on the structure of the construction industry in Northern Ireland show that there are 29,874 male employees in construction compared to 5,900 female employees.¹²¹ It is clear that more must be done to tackle gender inequalities in representation and career progression in male-dominated sectors such as construction so that women do not lose out in terms of increasing skills or accessing these jobs.

We support the Commission on a Gender-Equal Economy proposals for the creation of a 'Caring Economy'¹²² based on gender equality, wellbeing and sustainability. WBG research¹²³ found that a 2% GDP investment in care (for example, social care, childcare, parental leave and care leave) creates double the number of jobs for women and almost as many for men than the same investment in construction. We believe that there is a strong argument for a greater investment in the care sector including childcare.

51. Does the age profile and make up of the construction sector (older workers/self employed) require a specific intervention to support our housing supply in the future?

As previously outlined in our answer to Q51 the construction sector is male dominated. We believe that there needs to be specific interventions to ensure a fairer representation of women within this sector and to ensure where funding and

¹²¹ Construction Output Statistics - Q4-2020, NISRA, April 2021

<https://www.nisra.gov.uk/publications/construction-output-statistics-q4-2020>

¹²² Creating a Caring Economy: A Call to Action, Commission on a Gender-Equal Economy, Women's Budget Group, October 2020

<https://wbg.org.uk/wp-content/uploads/2020/10/WBG-Report-v10.pdf>

¹²³ Investing in the Care Economy: A gender analysis of employment stimulus in seven OECD countries, International Trade Union Confederation, March 2016

[Investing in the Care Economy - International Trade Union Confederation \(ituc-csi.org\)](https://ituc-csi.org)

investment is made into construction that this does not exacerbate existing inequalities.

We wish to highlight an important issue around apprenticeships which has been the subject of a recent ARK working paper.¹²⁴ Some of the key findings are that:

- Men represent the majority of participants on ApprenticeshipsNI programmes, with their representation increasing year on year since 2013/14. The number of women participants over the same period has fallen.
- Men also dominate new Higher-Level Apprenticeships (HLAs), with the number of men participants almost double that of women participants. HLAs continue to privilege traditionally male sectors and remain under- responsive to an identified skills shortage in the social care sector.
- ApprenticeshipsNI and HLAs exhibit unmitigated occupational segregation, perpetuating harmful stereotypes which lock women into economic and labour market disadvantage over the course of their lifetime. For example, men represent almost all ApprenticeshipsNI in building and construction, engineering and transport operations and maintenance frameworks while women represent a significant proportion of health and social care apprentices. HLAs also exhibit significant occupational segregation, with men representing 90% of engineering and manufacturing technologies and 89% of construction, planning and the build environment apprentices

While this research focuses on apprenticeships there are clear connections with the levels of representation of women in the construction sector. If most of those who train in construction are men or boys then naturally most of those employed in the construction sector will be men. We would urge the Department to ensure that specific interventions are made in relation to apprenticeships and in other areas of the construction sector to ensure more equal representation of women.

¹²⁴ Gender Budgeting: Working Paper2, Case Study: Apprenticeships in Northern Ireland, ARK Working Papers, February 2021
[Gender_Budgeting-2.pdf \(ark.ac.uk\)](#)

52. Does NI need some large Green Building Projects such as those being developed elsewhere to help create momentum for a changed skills agenda here?

The International Labour Organization (ILO)¹²⁵ has argued that without consistent gender mainstreaming, sustainability in a green economy is inconceivable arguing that *“gender equality must be at the core of promoting green economies that are low-carbon, resilient and sustainable.”*

The green economy and the creation of ‘green jobs’ offers the potential to pay higher wages and offers career paths to workers with the necessary skills and education. However, due to pre-existing gender inequalities there is concern that the green economy may not necessarily guarantee equal access to these green and decent jobs for women. Many of these jobs are expected to be concentrated in parts of the economy which are traditionally male dominated and women’s access may be further limited due to a lack of the necessary training and experience.

There is therefore a need to acknowledge existing gender imbalances to ensure that women and men can equally benefit from the opportunities the green economy can provide. A failure to do so will result in the continuation of existing gender inequalities and prevent the achievement of the Sustainable Development Goals.¹²⁶ The ILO recommends that *“all measures must be taken to ensure that pre-existing gender inequalities are not transferred to the emerging green economy and the opportunities for women in the changing labour market must be identified and grasped. Women and men must be encouraged and given the necessary support to enable equal access and benefit from green jobs.”*¹²⁷

The Women’s Budget Group (WBG) highlights that the narrow definition of green jobs as those in construction and technology can obscure the fact that the care industry is

¹²⁵ Gender Equality and Green Jobs, International Labour Organization Policy Brief, 2015
[wcms_360572.pdf \(ilo.org\)](#)

¹²⁶ <https://sdgs.un.org/goals/goal5>

¹²⁷ Gender Equality and Green Jobs, International Labour Organization Policy Brief, 2015
[wcms_360572.pdf \(ilo.org\)](#)

already a low carbon and high recompense sector. WBG research¹²⁸ found that a 2% GDP investment in care (for example, social care, childcare, parental leave and care leave) creates double the number of jobs for women and almost as many for men than the same investment in construction. Investment in free, universal childcare especially returns almost all of its initial investment. Eurostat data suggests that the care industry is 30% less polluting (in terms of Greenhouse Gas emissions) than the construction industry and that the education industry is 62% less polluting than the construction industry.¹²⁹ This makes investment in this type of social infrastructure economically, environmentally and equality sound.

53. Are there any other areas that could impact on the development of the Housing Supply Strategy that you feel have not been covered in this call for evidence?

We again refer the Department to the Feminist Recovery Plan for Northern Ireland¹³⁰ which details many long existing gender inequalities that have impacted on women which have been worsened by the Covid19 pandemic. This must be understood by the Department so that they do not take a gender-neutral approach to this issue and recognise the different experiences of men and women as a result of existing gender inequalities.

¹²⁸ Investing in the Care Economy: A gender analysis of employment stimulus in seven OECD countries, International Trade Union Confederation, March 2016

[Investing in the Care Economy - International Trade Union Confederation \(ituc-csi.org\)](https://ituc-csi.org/investing-in-the-care-economy)

¹²⁹ WBG calculations from Eurostat data

<https://ec.europa.eu/eurostat/data/database>

¹³⁰ Covid-19 Feminist Recovery Plan, Women's Policy Group NI, July 2020

<https://wrda.net/wp-content/uploads/2020/07/WPG-NI-Feminist-Recovery-Plan-2020-.pdf>