



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

Response to: Housing Supply Strategy

Issued by: Department for Communities (DfC)

December 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. Access to suitable, good quality and secure housing has significant impacts for health, wellbeing and quality of life as well as providing the basis from which people can work and contribute to their local communities.

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 the final 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 responses made by our colleagues in the Women's Policy Group, Housing Rights Service, HereNI & Cara-Friend and Unison. We fully endorse their responses and support their evidence and recommendations in relation to the development of the final Strategy.

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 consultation 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 equality² to go beyond paying lip service to gender

² 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."*³ The issue of gender neutrality is a significant barrier to women's equality and this issue must be recognised by the DfC across all its work including in the development of the Housing Supply Strategy.

Gendered social norms restrict and limit women's roles in the economy, thereby contributing to women's economic disadvantage relative to men.⁴ 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 Group⁵ has highlighted that rather than gender-neutral aspects of Universal Credit disproportionately affect

³ Ibid, paragraph 8

⁴ 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>

⁵ '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/>

women. This includes conditionality for parents and incentives for second earners as well as using a traditionally gendered 'male breadwinner' model.

Locally, research by the Women's Regional Consortium⁶ 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 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)

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

⁶ 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>

across their lifetimes. Lone parents (in Northern Ireland 91% of lone parents are women⁷) are even more vulnerable to poverty. In Northern Ireland 37% of single parents are living in poverty.⁸ 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.⁹

“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.

“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.

⁷ 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>

⁸ Households Below Average Income: Northern Ireland 2018/19, DfC & NISRA
<https://www.communities-ni.gov.uk/system/files/publications/communities/hbai-2018-19.pdf>

⁹ A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women’s Budget Group, February 2019
<https://fabians.org.uk/a-female-face/>

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.¹⁰ These welfare reform and austerity measures have tended to limit the ability of the system to protect against poverty.¹¹

Locally, an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)¹² 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)

Research by the Women’s Regional Consortium on the impact of austerity¹³ and on the impact of Universal Credit¹⁴ 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

¹⁰ 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>

¹¹ 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

¹² 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

¹³ 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>

¹⁴ 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>

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.”*¹⁵ 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.”*¹⁶

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 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.¹⁷

¹⁵ 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

¹⁶ Ibid, para 18

¹⁷ Shadow report for the examination of the UK by the Committee on the Convention to Eliminate Discrimination against Women, NIWEP, January 2019

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)

2.3 Universal Credit

Women’s Regional Consortium research on the impact of Universal Credit on Women¹⁸ has shown that women’s experiences living on Universal Credit are 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 Covid19 crisis.

¹⁸ 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>

“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.”

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

2.3.1 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 August 2021, 46% (25,8200) of households receiving a payment of Universal Credit with entitlement to support for

housing were in the social rented sector, compared to 53% (30,150) in the private rented sector.¹⁹

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.²⁰ 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.²¹ 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.²² These arrears have also had particularly serious implications for those in the private rented sector in Northern Ireland as most private landlords only have one or two properties²³ and are therefore much less likely to be able and willing to withstand arrears of this level.

Research by the Women's Regional Consortium²⁴ showed that the Universal Credit five-week wait had caused a number of the women to experience arrears with their

¹⁹ Universal Credit: Northern Ireland Data to August 2021, DfC & NISRA, May 2021

[NI Universal Credit Statistics August 2021 \(communities-ni.gov.uk\)](https://communities-ni.gov.uk/northern-ireland/universal-credit-statistics-august-2021)

²⁰ 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

²¹ Problem debt and the social security system, StepChange, January 2020

<https://www.stepchange.org/Portals/0/assets/pdf/social-security-mini-brief-report.pdf>

²² 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

²³ 84% of private landlords in Northern Ireland own 1 or 2 properties, Department for Communities' Landlord Registration Scheme

²⁴ 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>

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.”

“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)

2.4 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.²⁵ This included important mitigation payments around the Benefit Cap and Bedroom Tax as well as providing some help around Universal Credit.

²⁵ 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>

The New Decade, New Approach agreement²⁶ 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 Coalition²⁷ 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.²⁸

It is to be welcomed that legislation is currently working its way through the Northern Ireland Assembly to extend the existing mitigations until 2025 and to close the loopholes. Protections from the Bedroom Tax are vitally important in Northern Ireland where there is a significant mismatch between the social housing stock and the type of housing required to meet demand under the Bedroom Tax rules. Just 18% of the social housing stock only has one bedroom yet single applicants consistently account for around 45% of the waiting list. This means that many people have no choice but to move to a property where they have extra rooms and therefore would be subject to the Bedroom Tax without these mitigations. This situation is unlikely to change in the short to medium term. Therefore, there is a need to ensure that these important payments continue beyond 2025 to provide much needed protection for people in Northern Ireland.

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 welfare reform policies. Equality statistics on the existing mitigation payments show that these were paid to more women than men.²⁹

²⁶ 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

²⁷ 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.

²⁸ Cliff Edge Briefing Paper, September 2020

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

²⁹ Northern Ireland Welfare Supplementary Payment Schemes, Section 75 statistics November 2017 to April 2019, DfC

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, the Universal Credit five-week wait 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.

We welcome the Independent Review into the Welfare Mitigations which is ongoing at present and look forward to their report and recommendations. We urge the Department to consider the findings and recommendations within this report as part of the Housing Supply Strategy as this issue is so closely connected to housing affordability.

2.5 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 women it has deepened the inequalities they already experience. In July 2021 the Women's Policy Group in Northern Ireland re-launched their Feminist Recovery Plan³⁰ highlighting these gender inequalities and the impact of the Covid19 pandemic. 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

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

³⁰ NI Covid-19 Feminist Recovery Plan: Re-launch – One Year On, Women's Policy Group NI, July 2021

<https://wrda.net/wp-content/uploads/2021/07/WPG-COVID-19-Feminist-Recovery-Plan-Relaunch-One-Year-On.pdf>

impact of the pandemic on women. We refer the Department to the Feminist Recovery Plan for Northern Ireland. The detail within this plan must be understood by the Department so they do not take a gender-neutral approach to the issue of housing and recognise the different experiences of men and women as a result of existing gender inequalities.

A Women and Equalities Committee report³¹ 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 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.³² 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.”*

³¹ 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>

³² <https://www.theguardian.com/society/2021/feb/15/ehrc-urged-to-investigate-ministers-for-equality-failures-in-covid-response>

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.³³ 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.

2.6 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

³³ 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>

2020 from 6,630 new claims in February 2020. The latest figures show that in August 2021 there were 116,280 households on Universal Credit in Northern Ireland.³⁴ 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 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.

2.7 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.³⁵ 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.³⁶

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

³⁴ Universal Credit: Northern Ireland, DfC & NISRA, August 2021

<https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-ni-uc-stats-aug-2021.pdf>

³⁵ 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](#)

³⁶ NERI blog post, August 2020

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

have experienced a drop in income.³⁷ Locally, Housing Rights research³⁸ 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 research³⁹ 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.⁴⁰

2.8 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

³⁷ Covid Debt Rescue, Emergency support for renters to keep their homes, StepChange, March 2021

[covid-debt-rescue-report-stepchange.pdf](#)

³⁸ 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)

³⁹ 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](#)

⁴⁰ NIHE House Condition Survey 2016

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

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 women⁴¹ 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."*⁴²

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.

2.9 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

⁴¹ Information provided in an email to Women's Support Network from the DfC in November 2020

⁴² A home of her own, Housing and Women, Women's Budget Group, July 2019
<https://wbq.org.uk/wp-content/uploads/2019/07/WBG19-Housing-Report-full-digital.pdf>

children. Domestic abuse is gendered with the majority of domestic abuse victims being women. Research by Crisis⁴³ 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.⁴⁴ 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 2018⁴⁵ 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 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 2020/21, 530 women and 319 children stayed in Women's Aid refuges across Northern Ireland.⁴⁶ These specialised and secure refuges are key to ensuring that victims, particularly women, have somewhere to turn when trying to escape abuse. 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

⁴³ 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

⁴⁴ 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](https://www.safeathome.org.uk/wp-content/uploads/2018/03/28-web-ready-safe-at-home-report.pdf) ([gentoogroup.com](https://www.gentoogroup.com))

⁴⁵ Annual Report on UK Femicides 2018, Femicide Census [Femicide-Census-Report-on-2018-Femicides-.pdf](https://www.femicidecensus.org/wp-content/uploads/2018/03/Femicide-Census-Report-on-2018-Femicides-.pdf) ([femicidecensus.org](https://www.femicidecensus.org))

⁴⁶ Women's Aid Federation Northern Ireland 2020-2021 Annual Report, Women's Aid Federation NI, December 2021 <https://www.womensaidni.org/assets/uploads/2021/12/WAFNI-Annual-Report-20-21.pdf>

Ireland (PSNI)⁴⁷ show that during the 12 months from 1 October 2020 to 31 September 2021 there were 31,470 domestic abuse incidents in Northern Ireland. The number of domestic abuse crimes rose to 20,260, an increase of 6.9% on the previous 12 months and the highest 12-month period recorded since 2004/05. This points to the urgent need for increased funding for 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 Convention⁴⁸ 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 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.”*⁴⁹

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.

We have concerns about victims/survivors having to move out into the private rented sector without adequate protections. *“The experience of Housing Rights’ clients,*

⁴⁷ Domestic Abuse Incidents and Crimes Recorded by the Police in Northern Ireland, Update to 30 September 2021, PSNI & NISRA, November 2021
<https://www.psni.police.uk/globalassets/inside-the-psni/our-statistics/domestic-abuse-statistics/2021-22/q2/domestic-abuse-bulletin-sep-21.pdf>

⁴⁸ 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://conventions.coe.int/Treaty/Html/107)

⁴⁹ 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 \(coe.int\)](https://conventions.coe.int/Treaty/Html/107)

*many of whom are on low incomes, is that within the private rented sector a sub sector exists which is characterised by poor standards, insecurity of tenure and problems with affordability.”*⁵⁰

We would also like to echo the concerns of our colleagues in the WPG who 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.

2.9.1 The Domestic Abuse and Family Proceedings Bill

The Domestic Abuse Act 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 Civil Proceedings Act in Northern Ireland does not contain any 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.⁵¹

⁵⁰ Private Tenancies Bill, 2021, Housing Rights Written Evidence, January 2022
<https://www.housingrights.org.uk/sites/default/files/policydocs/Housing%20Rights%20Written%20Evidence%20Private%20Tenancies%20Bill%202021.pdf>

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

The Women's Policy Group (WPG) also raised concerns about a lack of reference to housing in their submission on the Bill.⁵² The WPG called for similar protections to 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 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."*⁵³

[Committee for Justice - Report on the Domestic Abuse and Family Proceedings Bill \(niassembly.gov.uk\)](https://niassembly.gov.uk/committees/justice-committee/reports/committees-report-on-the-domestic-abuse-and-family-proceedings-bill/)

⁵² 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 \(wrda.net\)](https://www.wrda.net/wp-content/uploads/2020/06/WPG-NI-Evidence-Submission-to-Justice-Committee-05.06.20.pdf)

⁵³ 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 \(niassembly.gov.uk\)](https://niassembly.gov.uk/committees/justice-committee/reports/committees-report-on-the-domestic-abuse-and-family-proceedings-bill/)

We do not wish to see a 'silo' approach to these issues and they must be reflected both within and between Government departments. The Department must take account of the experiences of victims/survivors of domestic abuse in developing the Housing Supply Strategy and the actions arising from it.

2.9.2 Social Housing, Women and Domestic Violence

The number of households in priority need of social housing in Northern Ireland is at the highest level on record. In March 2021 there were 43,971 applicants on the social housing waiting list and of these 30,288 were in 'housing stress'.⁵⁴ 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%).⁵⁵ Changes to social housing therefore have a disproportionate impact on women who are overrepresented among those in housing need and among social renters.⁵⁶

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.

2.9.3 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

⁵⁴ Northern Ireland Housing Statistics 2020-21, NISRA & DfC, December 2021
[Northern Ireland Housing Statistics 2020-21 \(communities-ni.gov.uk\)](https://communities-ni.gov.uk/northern-ireland-housing-statistics-2020-21)

⁵⁵ NIHE House Condition Survey 2016
<https://www.nihe.gov.uk/Working-With-Us/Research/House-Condition-Survey>

⁵⁶ 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/wp-content/uploads/2017/11/Microsoft-Word-housing-pre-budget-nov-2017-final.docx)

and procedures within it.⁵⁷ CEDAW is an international human rights treaty which requires the State Parties to undertake legal obligations to respect, protect and fulfil women's 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'.⁵⁸ The Committee also recommended that the UK government should take measures to enable asylum-seeking and refugee women to access appropriate housing.⁵⁹

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.⁶⁰

2.10 Housing Data

A recent report by the Expert Advisory Panel on a Gender Equality Strategy⁶¹ 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

⁵⁷ Convention on the Elimination of All Forms of Discrimination against Women

<https://www.un.org/womenwatch/daw/cedaw/text/econvention.htm#intro>

⁵⁸ 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

⁵⁹ Ibid, (para 56)

⁶⁰ Ibid, (para 18)

⁶¹ 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>

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.

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).⁶² 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, robust data on Universal Credit claimants is available to help determine the extent and nature of the help being given for meeting housing costs.

2.11 Housing Outcome in the Programme for Government

We 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.

⁶² 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)

3.0 Specific Questions

Strategic Framework

1. **The Call for Evidence consultation showed that there was broad support for the proposed vision, objectives and timeframe for the Strategy. Based on the comments received we have updated these for the draft Strategy – are you content with these?**

Proposed Vision

The Women's Regional Consortium supports the proposed vision within the consultation and welcomes the amendments which have been made which acknowledge the vision is for 'everybody' rather than every 'household' and that it emphasises the importance of place. It is important that the vision for the Strategy should recognise that housing is more than a house it is about a home.

People from LGBTQI+ communities are more likely to be homeless at a younger age. Many will have left home and be viewed by the authorities as voluntarily homeless even though they may have left home because they do not feel safe there. **We support the call from our colleagues in HereNI & Cara-Friend for the word 'safe' to be included within the vision so that it acknowledges that everybody is entitled to feel safe in their home:**

"Everybody has access to a good quality, affordable, **safe** and sustainable home that is appropriate for their needs and is located within a thriving and inclusive community."

Timeframe

We agree that a long-term approach to housing supply is necessary and support the 15-year timeframe. 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 to facilitate amendments to the Strategy in response to a changing environment.

Objectives

In terms of the five objectives outlined in the consultation we believe it is not possible to separate issues around housing supply from other related issues such as poverty, deprivation, social security, 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 within and across Departments to tackle these societal issues will undoubtedly impact on housing supply.

There is a clear need for the Housing Supply Strategy to link with a range of other Strategies including the Homelessness Strategy, Older People's Housing Strategy, Irish Travellers Accommodation Strategy, etc. and any developments in relation to the forthcoming suite of Social Inclusion Strategies which are currently being developed.

Therefore, cross-departmental and inter-departmental working is essential in order to effectively transform housing supply in Northern Ireland and to meet the objectives outlined in the consultation. Without effective working in these regards these objectives simply won't be met.

Objective 1 - Creating Affordable Options: Increase housing supply and affordable options across all tenures to meet housing need and demand.

There is no doubt that there is a need to increase housing supply and that significant increases are needed in certain areas such as social housing. The supply of housing must be linked with need and demand. In order to do this effectively there must be robust data broken down across the full range of equality groups in order to determine where the current supply issues are and the characteristics of those most in need of housing. The need for complete data

broken down across the full range of Section 75 groups is vital – see section 2.10.

Access to data is also important in trying to predict future demand and the issues which may impact on future housing needs. The consultation document recognises that there needs to be a better understanding of future housing requirements including understanding different needs. We welcome this recognition within the consultation and once again stress the importance of access to comprehensive, robust data in order to be able to do this effectively.

Actions in relation to increasing housing supply must be firmly based on the needs identified from analysing this data so that supply is closely matched to the need that exists.

Within the need for comprehensive data is the need to consider intersectionality. This is something the women's sector has long been advocating Government departments to consider. 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 must be recognised that it is entirely possible for spheres of minority to exist in overlapping forms – see our answer to Question 10.

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. We are fully in agreement with our colleagues in Housing Rights that the issue of affordability 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.

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.

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 these policies – see section 2.2. The Housing Supply Strategy must be cognisant of these issues and the impact they have on housing affordability.

Housing supply must also take account of the full range of issues likely to have an impact on housing options, for example, the needs of victims/survivors of domestic abuse – see section 2.9

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*”**

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>

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."

Objective 2 – Prevention and Intervention: Prevent homelessness, reduce housing stress and improve and prioritise housing solutions for those most in need.

We welcome the change to the wording of this objective to state “prevent” homelessness rather than “reduce” homelessness. We believe it is important for this Strategy to be ambitious in this regard and to strive for prevention. As with many other issues prevention is better than cure. Prevention is also much more desirable in terms of the personal impacts of homelessness on people and families as well as the wider financial and societal impacts.

We welcome the focus in the consultation document on prioritising housing solutions for those most in need. We repeat however that this will only be successful if it is based on a complete picture of those who are in need which relies on access to complete and accurate data – see section 2.10.

The consultation acknowledges the need to put plans and policies in place to support the delivery of a range of housing types and sizes to meet the needs of a changing demographic and lifestyles. This is to be welcomed and we believe it is important that housing supply is closely matched to areas of housing need. The Strategy needs to consider supply not just in terms of the numbers of houses to meet housing need but the suitability of properties taking into account the

individual needs of different groups of people including lone parents, older people, migrant communities and those with disabilities.

“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.”

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

Impact of Welfare Reform

We wish to highlight the impacts of a decade of austerity and welfare reform policies. These policies have a major impact on affordability, housing stress and preventing homelessness. Women, particularly single parents, have been the most negatively impacted by these changes – see section 2.2. The social security system plays an important role in alleviating housing stress and preventing homelessness. However, welfare reform changes have lessened its ability to provide this important safety net for people. This is an important consideration in relation to reducing housing stress and protecting those considered the most vulnerable including children.

Cuts to social security benefits are creating major issues for affordability and causing housing stress. It is impacting on the ability of people and families to get their own home, to stay in their home or to move to a more suitable home. The Housing Supply Strategy must take account of this issue and work must be carried out within and between Departments in order to ensure that people have access to the support they need to access and maintain their tenancies.

It follows therefore that the welfare mitigation package in place in Northern Ireland is important in helping to alleviate housing stress and potential homelessness. We believe that it is vitally important that the existing mitigations in place to protect against the Bedroom Tax and the Benefit Cap are continued. We would also like to see a number of new mitigations introduced to protect people from the harsh impacts of the Universal Credit five-week wait and the two-child limit – see section 2.2. These welfare reform policies are creating financial hardship, debt and distress and will continue to impact on those who can least afford it. We welcome the ongoing Review into the mitigations and look forward to further developments around the mitigations.

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.⁶⁴ 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. This is evidenced by the fact that 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 that loss of rented accommodation is one of the top three causes of homelessness in Northern Ireland.⁶⁵ Of those in low incomes after housing costs 31% live in the private rented sector compared to 24% in the social rented sector⁶⁶ with statistics showing that more women are private sector tenants than men.⁶⁷

⁶⁴ 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/northern-ireland-housing-statistics-2019-20)

⁶⁵ Homelessness in Northern Ireland, NI Audit Office, December 2017

[Homelessness in Northern Ireland Full Report 0.pdf \(niauditoffice.gov.uk\)](https://www.niauditoffice.gov.uk/homelessness-in-northern-ireland-full-report-0.pdf)

⁶⁶ Households Below Average Income: Northern Ireland 2018/19, DfC & NISRA

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

⁶⁷ NIHE House Condition Survey 2016

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

Research by Housing Rights⁶⁸ 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.

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).⁶⁹ 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.⁷⁰

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 properties⁷¹ 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.

⁶⁸ 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)

⁶⁹ <https://www.communities-ni.gov.uk/publications/family-resources-survey-report-2018-2019>

⁷⁰ <https://www.communities-ni.gov.uk/publications/households-below-average-income-northern-ireland-201819>

⁷¹ 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 welcome the protections provided through the mitigations package for the Bedroom Tax for social housing tenants. However, this protection does not apply to private renters many of whom are in this sector because they have been unable to access social housing. We therefore support the Cliff Edge recommendation for a fund to be set aside within a strengthened mitigation package for a specialist comprehensive Financial Inclusion Service to support low-income private renters impacted by LHA cuts to address the affordability issues they face. This service should also include access to a grant to meet pressing need not met by existing support.

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.

“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.”

“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].”

“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.”

“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 like in the private rentals.”

“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.”

“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 Security, Poverty and Housing

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.

We remain concerned that in October 2021 six million low-income families across the UK on Universal Credit or Working Tax Credit experienced an overnight cut to their incomes of £20 a week (£1,040 a year). Many charities, think tanks and leading organisations urged the Government not to go ahead with this cut stating that it would further weaken social security support, cause a surge of people being pulled into poverty, and severe hardship for families who are already struggling to stay afloat. We argue that these actions by Government have clear impacts on housing and affordability.

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.

Working Poverty

It is not just those on social security benefits who struggle with housing costs and affordability issues. Those in low-income work face similar issues in terms of being able to meet their housing costs or afford available properties. There is a need to consider the experiences of those who are just outside benefit levels and have no access to any form of help to meet their housing costs because they work. This is often the case for women who are more likely to be in low-paid, part-time and insecure work – see section 2.2.

“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.”

“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!"

Housing Allocations

We are pleased to see the consultation address the points system for social housing allocation which is an important element in easing housing stress. However, there are well known problems with the social housing allocations system calling into question its ability to allocate based on objective need. This is an important issue for housing supply and this system must be effective and fair if it is to help contribute positively to wider housing supply considerations. Once again, this will require effective inter-departmental working partnerships to ensure the progress in these areas which will be necessary to help meet the objectives and vision within this Strategy.

"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."

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

"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."

"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."

“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.”

“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.”

Objective 3 - Quality: Improve housing quality

Focus group research with local women highlighted a frequently raised concern was the issue of housing conditions. For many of the 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.⁷² Housing Rights figures show

⁷² House Condition Survey, Main Report 2016, NIHE

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.

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.⁷³ 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.⁷⁴ 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.⁷⁵ 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%)."*⁷⁶

It is clear that the issue of poor quality housing has implications beyond the need for repair impacting on household budgets, health and wellbeing and this therefore links it to Objective 2.

We welcome the acknowledgement of the issues with the quality, security and safety of the private rented sector within the consultation. We stress the need that concerted focus must be given to improving housing quality in the private rented sector in the development of this strategy.

"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

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

⁷³ 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>

⁷⁴ Ibid

⁷⁵ Ibid

⁷⁶ 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>

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.”

“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.”

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

“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.”

Objective 4 - Better Places: Ensure the provision of housing options that contribute to the building and maintenance of thriving, inclusive communities and places.

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.”*⁷⁷ 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.

The Women’s Regional Consortium supports this objective and the need to invest in and develop local communities. We welcome that the consultation recognises that there is a need to take a more integrated, person and community-focused approach to the creation of sustainable and thriving places, where the voices of local people have a say.

⁷⁷ 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>

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.”*⁷⁸

We would encourage the Department to ensure the increased and effective engagement of women in place making and in the creation and maintenance of sustainable communities. We refer the Department to the guidance on consulting with women produced by Women’s Regional Consortium members WRDA.⁷⁹ 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.

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

⁷⁸ "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>

⁷⁹ 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

“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. It’s not 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.”

“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.”

“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.”

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

Objective 5 – Decarbonisation: Reduce whole-life carbon emissions from both new homes and existing homes and support a ‘just transition’ to carbon neutrality.

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. Support must be provided for those on the lowest incomes and for those with protected characteristics such as those with disabilities, migrant groups, older people, etc. to make this transition.

We believe that there is a need for gender proofing within this just transition to ensure that men and women benefit equally. The International Labour Organization (ILO)⁸⁰ 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.

⁸⁰ Gender Equality and Green Jobs, International Labour Organization Policy Brief, 2015 [wcms_360572.pdf \(ilo.org\)](https://www.ilo.org/wcms_360572.pdf)

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.⁸¹ 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.”*⁸²

We welcome the acknowledgement in the consultation that the lived experiences of those in the system need to help shape solutions. Indeed, the call for evidence showed broad support for the need to engage local communities in housing supply. However, while the consultation mentions these important issues there is little priority and detail given around how the Department proposes to do this. We therefore support the recommendation by Housing Rights that a sixth objective is added to the Strategy. We agree with Housing Rights on a new Objective 6: Lived Experience – involving people with lived experience in the design, development and delivery of the Strategy.

2. The assessment of the Call for Evidence has enabled us to develop a total of 15 longer term policies and interventions that will provide the basis to develop appropriate action plans. Do you agree with the focus of these high level long term policies and interventions?

We broadly agree with the 15 longer term policies and interventions in the draft Strategy as a basis to develop action plans. However, we wish to re-iterate that it is not possible to separate issues on housing supply from other related issues such as poverty, deprivation, social security, low-paid/insecure work, access to childcare, transport and health/leisure services. This will require inter-

⁸¹ <https://sdgs.un.org/goals/goal5>

⁸² Gender Equality and Green Jobs, International Labour Organization Policy Brief, 2015 [wcms_360572.pdf \(ilo.org\)](https://www.ilo.org/wcms_360572.pdf)

departmental and cross-departmental working without which we suggest the achievement of these longer term policies and interventions will not be possible.

We have some further comments on the longer term policies and interventions under each objective as detailed below.

Objective 1

The consultation lists as one of the longer term policies and interventions:

“Support upskilling, reskilling, delivery of apprenticeships and training for both existing workers and new workers in order to underpin a modern integrated housing system.”

We would be concerned that an emphasis on construction as part of this would be 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.⁸³ 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 believe that there needs to be specific interventions to ensure a fairer representation of women within this sector and to ensure where funding and investment is made into construction that this does not exacerbate existing inequalities.

⁸³ Construction Output Statistics - Q4-2020, NISRA, April 2021
<https://www.nisra.gov.uk/publications/construction-output-statistics-q4-2020>

We are particularly concerned about the situation around apprenticeships. We wish to highlight an important issue around apprenticeships which has been the subject of a recent ARK working paper.⁸⁴ 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

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.

⁸⁴ Gender Budgeting: Working Paper2, Case Study: Apprenticeships in Northern Ireland, ARK Working Papers, February 2021
[Gender_Budgeting-2.pdf \(ark.ac.uk\)](#)

Objective 2

We welcome the longer term policy/intervention to *“deliver housing solutions for citizens who are most in need, recognising the inequalities identified through the Equality Impact Assessment.”*

This is predicated on the availability of comprehensive, robust data across all the Section 75 groups. We have previously highlighted the importance of data in order to map need and demand and to fully identify where inequalities exist. We note the EQIA states that data gaps appear to be most substantive in respect of political opinion, sexual orientation, disability and to a lesser extent ethnicity/race and gender (in the latter case the evidence gap is in respect of transgender people only).

The EQIA also highlights the complexity of the relationship between gender and housing and recognising the issue of intersectionality. *“Data shows that while more women than men experience poverty both before and after their housing costs are accounted for, behind this statistic there are likely to be intersectional issues at play, with for example dependents/caring responsibilities and marital status influencing these trends. The majority of lone parents for instance are female.”* The EQIA acknowledges that further data disaggregation and related research is required to gain a better understanding of the causes of these key inequalities. The importance of access to up-to-date, comprehensive data should remain a priority for this Strategy – see section 2.10.

We support the recommendation made by Housing Rights that a further intervention should be added under this objective to *“Work collaboratively at an inter and intra departmental level to ensure people have access to the support required to access and sustain tenancies.”* As we have previously outlined the social security system plays an important role in protecting people from poverty and preventing homelessness. It is vital therefore that partnership working with the social security division of the Department is part of this process and effective partnership working in this regard will be key to ensuring the success of the Strategy.

Objective 3

We welcome the intervention to *“Update existing policies and develop new policies that will ensure our housing standards support the delivery of higher quality homes across all tenures.”*

It is clear that poor quality homes and poor conditions have significant implications for those living in these properties in terms of their health and wellbeing. It is also clear that these issues can eventually result in costs to the wider community and to other sectors such as the health service if they are not remedied. We therefore support the amendment suggested by Housing Rights that the words *“to improve health and wellbeing”* should be added to this intervention.

Objective 4

We agree with the intervention in the consultation to *“Work in new and different ways with local Councils and Community Planning Partnerships to realise opportunities to increase and maintain housing supply and help create sustainable and inclusive urban and rural places.”* We suggest that this should also include working in new and different ways with those with lived experience of housing issues. The consultation mentions involving those with lived experience but only once in the document. If it is not specific within the objectives then we fear it may not happen or be taken seriously. It is important to talk to those who live in local areas about their experiences and views as this can help to match supply to demand and to create sustainable and inclusive places.

We note that the consultation states that there needs to be options for people *“to be able to stay close to their families and support networks.”* We suggest that this is particularly important for women who on average earn less than men, are more likely to claim benefits, be in part-time and precarious work and are therefore more likely to be reliant on close family and community ties. This is especially the case for lone parents who are most at risk of poverty. It is important for these women to stay close to family, friends and the community they know so that they can be close to the supports they need to survive. For

women it is often about having someone available to help take/collect the kids from school, babysitting while you work or attend education/training or help with sick children, running to the shops, etc.

Women who experience poverty, low pay, lack of education or who are victims/survivors of violence often want to stay within their local communities because they know they will have better outcomes and be able to live better and this ultimately places less burden on other services. Being expected to live outside their local communities can people they find it hard to survive and become isolated.

In order to properly understand the importance of community and place it is important to listen to the voices of those who experience housing need.

Objective 5

As previously stated we support efforts to achieve carbon neutrality in both new and existing homes. We very much welcome that the consultation acknowledges that it must ensure *“a just transition to decarbonised solutions.”*

There is a need to ensure that those on the lowest incomes, who are often among the most marginalised, are supported through the transition to carbon neutrality. As part of this process it is vital that these groups are engaged with to determine the full range of issues and pressures they face with this transition. They must receive the supports they need to cope with these changes – see our answer to Question 1.

3. The Strategy includes an enabling principle to: ‘Adopt a whole system approach, collaborate with central and local government and the third and private sectors to inclusively transform supply.’ Do you agree with the proposed enabling principle?

While we agree with the proposed enabling principle and welcome the acknowledgement that there is a need for collaboration with other sectors

including the third sector this collaboration must be properly respected and valued.

The work of the community and voluntary sector must be valued as part of this process and not simply viewed as a 'tick-box' exercise. This collaborative working must not be viewed as an add-on or completely ignored. Many of the organisations working within the community and voluntary sector have years of experience in housing and in the field of tackling poverty and disadvantage which is often so connected to housing supply. They are skilled at reaching the most marginalised within communities and provide trusted spaces and skilled people to do this work. It is valuable work that must be recognised and rewarded as such.

The consultation document states that using a 'whole system' approach illustrates the central role of people, places and communities. We welcome this acknowledgement within the consultation and we would like to see this reflected within the enabling principle:

“Adopt a whole system approach, collaborate with central and local government, the third and private sectors and those with lived experience to inclusively transform supply.”

The voices of those with lived experience are a crucial element in helping to shape solutions to housing supply. This must therefore be reflected in the enabling principle. This helps to put priority and focus on this as an essential part of this work. However, this must be genuine engagement and valued for the expertise and knowledge it brings. Too often this is carried out as a tick-box exercise without giving sufficient importance to its value. It is vitally important to understand the needs of people, places and communities in the development of this Strategy and this must be reflected in all parts of the Strategy.

“The work of the women’s sector and women’s centres is not valued. We are just fed crumbs of funding.”
(Participant at Consultation Event)

“We are working in partnership with local Government on a project but they have no sense of what is required on the ground to make it work. They just don’t understand how it works at community level.”

(Participant at Consultation Event)

“True partnership working can make a massive difference but the way it works with Government now is not partnership it is Government trying to dictate what’s happening. It is not a level playing field. There’s partnership and there’s partnership – Government are just using the partnership but they don’t truly see community organisations as a partner. They don’t get it at all.”

(Participant at Consultation Event)

“The community needs to have a bigger role in this – there’s trust at community level.”

(Participant at Consultation Event)

“It needs people working at grass roots level. There needs to be a bottom-up approach so that everyone’s voices will be heard.”

(Participant at Consultation Event)

Measurement

4. Do you agree with the proposed ambition to deliver 100,000 plus homes over the 15-year lifespan of the Strategy?

We agree with the ambition to deliver 100,000 plus homes over the lifespan of the Strategy. In particular, we welcome that at least a third of these will be social homes. Demand for social housing far outstrips supply and the importance of the social housing sector in providing protections for those on the lowest incomes and those with particular housing needs cannot be understated – see section 2.9. We are firmly of the belief that resources should be targeted to those most in need.

5. Do you agree with the proposed indicators to measure the success and progress of the Housing Supply Strategy?

We are in agreement with the proposed indicators although we defer to the knowledge of our colleagues within the housing sector who have greater expertise in this area to answer this question.

6. Are there any additional indicators that you consider would add value in measuring success and progress?

We support the Housing Rights recommendation for a sixth objective to be included in the Strategy around involving people with lived experience. We therefore believe that there should be an additional indicator which commits to true co-design with those with lived experience throughout the development and delivery of the Strategy.

We use the words 'true co-design' deliberately as the term co-design is being frequently used by Government departments but often does not directly involve those with lived experience. There is much work, focus and resources required to ensure a true co-design process that genuinely involves those with lived experience at all stages of the process.

This work must go beyond statistics and record the actual experiences of people who use the system. It should specifically target certain groups who are most negatively impacted by housing supply issues such as victims/survivors of domestic abuse, those with disabilities, LGBTQI+ people and migrant communities and across the Section 75 groups. This would help to gain a better understanding of the housing experiences of these groups and the intersectionality issues that exist.

Delivery and Oversight

7. How can we best ensure that key strategic partners such as other Departments, local government, the Voluntary & Community sector and private sector can participate in the delivery and oversight of the Supply Strategy delivery?

As has been stated a number of times throughout our response we believe that the delivery of this Strategy depends on effective partnerships within Departments, across Departments and with local government. It is therefore important that all of the relevant Departments take ownership of this Strategy and it is not seen to be solely the remit of the Department for Communities. There are substantive issues that impact on housing supply which must be considered in order for the Strategy to make real and necessary changes. This needs effective buy-in and oversight from a range of strategic partners.

We support the Housing Rights call for a specific and standalone housing outcome to be included in the Programme for Government – see section 2.11. If this was to happen we believe that it would make it easier for the inter and cross departmental working which is necessary to realise the vision of this Strategy. Should a specific and standalone housing outcome be included in the forthcoming Programme for Government, a specific Delivery Plan will be developed for this outcome which will, Housing Rights understands, include senior responsible owners from across government departments required to work together towards the realisation of outcome. This structure may provide a useful vehicle to operationalise the cross departmental co-operation required to progress work under the Housing Supply Strategy.

Our answer to Question 3 addresses some of the points we wish to make around the participation of the Voluntary & Community Sector. The expertise, knowledge and resources provided by the Voluntary & Community sector must be respected and valued as part of this process and not viewed as a tick-box exercise.

The services delivered by the Voluntary & Community Sector across Northern Ireland often provide a lifeline to local people. They are trusted local organisations that people are more likely to turn to or accept being referred to for support and advice in terms of stress and difficulty. Frontline services delivered through these organisations complement current statutory provision ensuring that the objectives and outcomes of strategies, programmes and policy frameworks for Northern Ireland are met. This highlights the importance of these organisations to the success of Government strategies such as this one. Despite the importance of these organisations reductions in funding and the short term nature of funding provides challenges for the capacity of many of these organisations to be involved in the delivery and oversight of strategies. Much greater value must be placed on these unique and trusted services.

Once again we highlight the importance of lived experience in the delivery and oversight of the strategy. We believe that lived experience must be central to this Strategy in order for it to be effective and to realise its vision – see answer to Question 6.

Action Planning

8. Are there any proven or new approaches you are aware of, that you believe would help us work best with other organisations to develop and deliver the action plans?

As previously stated there must be genuine partnership within and between organisations to ensure the delivery of the action plans. The input and experience of the Voluntary & Community sector and those with lived experience must be part of the delivery of the action plans. It must be respected and valued for the contribution it makes and must be backed up by sufficient funding and adequate time to allow for effective implementation. Review mechanisms must also be in place to ensure effective delivery of the action plans.

Citizen Engagement

9. There was broad support in the Call for Evidence for the need to engage local communities in housing supply to create sustainable, thriving and inclusive communities. In what way do you consider this could best be achieved and do you have any examples of best practice in this area?

As we have previously stated lived experience must not be a tick box exercise it must be about genuine participation and willingness to learn from those who understand and live the issues – see our answer to Question 9. It must recognise the time, energy and personal input required to share lived experience and in some cases that this can be difficult to share. This engagement should not be flippantly or freely demanded and taken. It should have proper recognition and value and consideration should be given to providing a resource for this work.

The Department should also consider specific engagement around the lived experience of those who are the most hard to reach and whose voices are often not heard. Voluntary & Community sector organisations are often the best way of reaching out to these groups as they have years of experience in working for those who are the most marginalised. They also provide trusted, local spaces where people are encouraged to share their views and are more comfortable in sharing the issues they face. Once again, the involvement of the Voluntary & Community sector who represent many of those with lived experience must be recognised and their expertise and time must be valued.

We refer the Department to the guidance on consulting with women produced by Women's Regional Consortium members WRDA.⁸⁵ 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

⁸⁵ Women at the Heart of Public Consultation, A guide for Public Authorities and Women's Organisations, WRDA, November 2017
https://wrda.net/wpcontent/uploads/2018/10/WRDA_WomenAtTheHeartOfPublicConsultation.pdf

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.

We recommend the Department uses this guidance to consider how best to engage local communities. There is a need to consider how best to involve people at all stages of the process and to use different approaches for different groups of people. Those who experience housing supply issues are not all the same, they will have different needs and experiences and some may require additional support, for example, migrant communities, victims/survivors of domestic violence, etc.

The Department should consider good practice examples of participation such as:

- **UC:Us** – is a group of people in Northern Ireland who receive Universal Credit. Their aim is to share their experiences and insights so that things might change for the better in the future. They came together in June 2019 as part of a participatory research project which looked at experiences of Universal Credit in Northern Ireland. Researchers from the University of York and Ulster University supported them to share their experiences of Universal Credit and come up with recommendations to improve things.
- **Renters' Voice** - is a project for private renters in Northern Ireland who want to make renting better for everyone. Their aims are to build a strong voice for private tenants in Northern Ireland and a culture of tenant participation in development of the Private Rented Sector. They are supported by Housing Rights and funded by Nationwide Foundation. They have established a core group of private renters who meet regularly, set priorities and lead the activities of the project.
- **Right to a Home Campaign by Participation and the Practice of Rights (PPR)** – is a human rights based campaigning organisation working on a range of issues including housing. Their campaigns are led by people who are impacted by human rights issues. PPR organises alongside those worst affected by the housing crisis: homeless young people forgotten in

hostels, families in overcrowded conditions, asylum seekers and refugees at the mercy of landlords and multinational companies, Irish Travellers facing racist laws and policies and more. They work to make real improvements in people's lives while pushing for long-term change.

- **Women's Centres** – many women's centres opened in the heart of communities in response to a need in their local communities which was not being met by Government or anyone else. They are often located in areas of greatest deprivation. Women's Centres are able to reach and engage those who are the most marginalised because they operate within local communities and are trusted to do this work.
- **The Maternal Advocacy and Support (MAS) Project** – a project designed to promote positive mental health and wellbeing for women who are pregnant or have children aged 0-3 years, by offering women the opportunity to share experiences, engage in activities and express their views. The project is run by Women's Regional Consortium partner WRDA and is funded by the National Lottery Community Fund. The project works with eight local Women's Centres (Windsor, Falls, Footprints, Ballybeen, Greenway, Atlas, Women's Centre Derry and Strathfoyle) to create a network of peer support groups for women experiencing perinatal mental health issues. The MAS network supports women from disadvantaged communities to tell their story and participate in decisions that will improve perinatal mental health services.

Equality

10. Do you agree with the findings of the EQIA?

We agree with the findings of the EQIA and believe that it is crucial to the success of this Strategy that the Department involves the section 75 groups in the design, development and delivery of the Strategy. Without effective engagement with these groups it will be impossible to ensure that their needs are properly met in terms of housing supply.

We have highlighted throughout our response the need for robust data across these equality groups and once again stress the importance of this. The EQIA

highlights a number of areas where there are data gaps. In particular, the EQIA mentions limitations and gaps in the information and data on ethnicity and race and an evidence gap in respect of transgender people. In relation to gender it states that there are a few areas there is no more recent data/information available. It also states that NI Housing Executive data for social housing applications and allocations does not capture data on the sexual orientation of the individuals involved. Therefore, the experiences of the LGBTQI+ community in this respect are unknown.

The EQIA states that *“there remains a need to improve equality data collection and analysis within the key official statistics in order to inform the access, adequacy and sustainability of housing across all the Section 75 groups.”* It notes more substantive data gaps around political opinion, sexual orientation, disability and to a lesser extent ethnicity/race and gender (in this latter case the evidence gap is in respect of transgender people only). These areas must be the focus of attention going forward.

Key to the issue of inequality is intersectionality. Most people have multiple identities. Write Hanna Mason-Bish gives an example described a victim of a hate crime as *“disabled, gay and a woman”*. She described identity as *“messy”* and we agree that this often the case for many people. Intersectionality is an important factor in understanding the multiple ways in which discrimination and prejudice are experienced. Women are found in all protected groups and their experience of misogyny can be intensified by other aspects of their identity. The theory of intersectionality is crucial to understanding the experiences of women and marginalised groups more generally.

The EQIA states that *“when assessing the data sources for the experiences of one particular Section 75 group, the data is not controlled for other variables that may also have a bearing on housing outcomes. In effect there can be intersections between different equality categories. A case in point is the complexity of the relationship between gender and housing.”* The EQIA goes on to say that *“while more women than men experience poverty both before and*

after their housing costs are accounted for, behind this statistic there are likely to be intersectional issues at play, with for example dependents/caring responsibilities and marital status influencing these trends. The majority of lone parents for instance are female.”

We are pleased to see a recognition within the EQIA that more women experience poverty both before and after their housing costs and that it recognises that most lone parents are female, in fact in Northern Ireland 91% of lone parents are female.⁸⁶ We again stress the need for strengthened data and research in this area so that the drivers behind these inequalities can be better understood and therefore addressed. We also suggest that involving those with lived experience especially those where there are data gaps could be a good way of better understanding the intersectionalities and the issues at play.

The EQIA notes a number of statistics for lone parents in the sections under marital status and dependents including that around 45% of lone parent households are in the private rented sector and that lone parents are slightly more likely to be in social housing (35%) than single adults without children. While the EQIA recognises that the majority of lone parents are female elsewhere in the document it does not recognise this fact in these sections and we would like to see a better understanding of the gendered nature of these issues. The fact that 91% of lone parents are women in Northern Ireland makes them more likely to be living on a low income and therefore more likely to live in the private rented sector or in social housing.

11. Are there any other inequalities that have not been highlighted in the EQIA that you believe the EQIA needs to note?

We would point the Department to the excellent work carried out by Women's Centre Derry with regards to Syrian Refugee families which includes information

⁸⁶ Census 2011 – Key Statistics for Gender, Research and Information Service Research Paper, Northern Ireland Assembly, September 2014
[Census 2011 – Key Statistics for Gender \(niassembly.gov.uk\)](http://niassembly.gov.uk)

on their housing experiences. The Department should note the information provided in the written summary to the Northern Ireland Affairs Committee Enquiry in April 2021:

<https://committees.parliament.uk/writtenevidence/26449/pdf/>

“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.”

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.

We believe that the EQIA should note the impact of austerity and welfare reform on women. Research shows that 86% of the savings to the Treasury through tax and benefit changes since 2010 will have come from women.⁸⁷ Locally, Northern Ireland Human Rights Commission (NIHRC) research⁸⁸ 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

⁸⁷ 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>

⁸⁸ 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

income. This has significant implications for housing affordability for those on the lowest incomes.

12. Do you agree with the immediate next steps as outlined in Section 5 of the EQIA?

It is not clear what the immediate next steps are in Section 5 of the EQIA.

Rural

13. The Rural Needs Impact Assessment outlines that the development of the Housing Supply Strategy is likely to have a positive impact on people on Rural Areas? Do you agree with this assessment?

We are pleased that the Department has included a Rural Impact Assessment Screening as part of this consultation. We believe that this is very important given the fact that Northern Ireland has a significant rural population with 36% of the population living in rural areas.⁸⁹ Those who live in rural areas often have less access to services than those in urban areas. Rural dwellers often have specific needs and experiences and it is vitally important that their needs are addressed given the importance of rural living in Northern Ireland.

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.⁹⁰ 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. This vulnerability to poverty creates issues for women in terms of housing affordability and must be a consideration for this Strategy.

⁸⁹ Mid-Year Population Estimates – Urban/Rural Change, NISRA
<https://www.daera-ni.gov.uk/publications/mid-year-estimates-population-change>

⁹⁰ Rural Women's Manifesto, NIRWN, September 2015
<https://www.nirwn.org/wp-content/uploads/2016/12/NIRWN-Rural-Womens-Manifesto.pdf>

Affordable rural housing must 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 areas.⁹¹ Most unfit houses are in private ownership and located in more isolated rural areas. This must also be a focus for the Strategy and targeted actions to address this issue should be prioritised.

14. Is there any other evidence, information or issues you think should be considered in this screening?

In rural areas there is often a limited availability or a low turnover of social housing stock. This means that people in need of support may not come forward to be considered for social housing. Limited awareness of social housing stock combined with the low numbers of people coming forward combines to ensure a lack of housing supply in rural areas as the need for new social homes is based on the waiting list.⁹² It is therefore critical to engage local communities to assess the local needs, challenges and barriers that exist.

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 divisions⁹³ 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.

Networking, collaboration and genuine partnership within and between organisations and different sectors are vital to support rural communities. Multi-

⁹¹ <https://www.nihe.gov.uk/Community/rural-issues/Improving-properties-in-rural-areas>

⁹² Reaching Rural, Rural Strategy 2021-2025, NI Housing Executive
[Reaching Rural - Rural Strategy 2021-2025 \(nihe.gov.uk\)](https://www.nihe.gov.uk/Reaching-Rural-Rural-Strategy-2021-2025)

⁹³ Rural communities...polite avoidance and denial – rhetoric or reality?, Tony Macaulay, March 2013
<https://www.ruralcommunitynetwork.org/app/uploads/2021/08/Rural-communities-polite-avoidance.pdf>

agency approaches such as Tackling Rural Poverty & Social Isolation (TRPSI) 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. The Women's Regional consortium would welcome additional innovative multi-agency projects in rural areas.

The Rural Needs Impact Assessment does not mention lived experience. As previously highlighted we believe that lived experience is a vital part of this entire process – see our answer to Question 9. The Department must work to meaningfully involve the lived experience of rural dwellers in the design, development and delivery of this Strategy to ensure that their particular needs are met in relation to housing supply.

Fuel poverty is recognised as an issue within the Rural Needs Impact Assessment. It quotes statistics from the Continuous Household Survey which show that the cost of living is higher in rural areas and rural households are twice as likely as urban households to be in fuel poverty – 32% of rural households experience fuel poverty compared to 16% in urban areas. Given the current cost of living increases and the likelihood of the energy crisis lasting for some considerable time according to the Northern Ireland Utility Regulator this needs specific focus and targeted action as part of this Strategy.

We also welcome the acknowledgement of the need for more investment in infrastructure in rural areas including broadband access. Statistics show that broadband speed and availability, though improving, is still much lower in rural than in urban areas. In 2019, 19% of internet-enabled rural premises in NI were still unable to achieve a 'decent' broadband speed.⁹⁴ Access to good quality broadband must now be considered an essential service. The impact of the Covid19 pandemic has brought this issue even more to the fore. With more

⁹⁴ Reaching Rural, Rural Strategy 2021-2025, NI Housing Executive
[Reaching Rural - Rural Strategy 2021-2025 \(nihe.gov.uk\)](https://www.nihe.gov.uk/Reaching-Rural-Rural-Strategy-2021-2025)

people required to work and school from home access to decent, reliable broadband is a necessity.

The connection to community and place can be different in rural areas. For many there are deep and long-lasting connections to land ownership and family farms which has implications for housing supply and community cohesion. A greater understanding of these issues can be gained through listening to the lived experience of those in rural areas.

General

We would welcome any other comments or suggestions you have that you consider are relevant to developing and delivering the Housing Supply Strategy.

Housing Inequality and Access to Data

We welcome the statement by the Minister for Communities, Deirdre Hargey, that *“limitations on the right sort of housing options are a major contributor to inequality and deprivation in our society.”* This reinforces the equality impacts of poor housing supply and the urgent need for these inequalities and hardship to be addressed.

To do this there is a need for good quality, robust data disaggregated across all the Section 75 areas so that key inequalities are effectively identified and actions flowing from the Strategy are targeted to where the need exists – see section 2.10.

In order to address housing supply effectively there must be robust data broken down across all the equality groups in order to determine where the current supply issues are and the characteristics of those most in need of housing. 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.

There are problems with mis-identification and mis-recording of trans issues which means that information and the experiences of trans people may not be accurately reflected. This underlines the importance of training on language and terminology in this area. The need for more robust data collection is clear in order to gain a better insight into the inequalities that exist for the trans community. This could also be assisted by gathering the lived experiences of trans people within housing and give a better indication of the intersectionality issues which may also be at play.

Housing and Care

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."*⁹⁵

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 – see section 2.2.

⁹⁵ Creating a Caring Economy: A Call to Action, Commission on a Gender Equal Economy, Women's Budget Group, September 2020
<https://wbq.org.uk/wp-content/uploads/2020/10/WBG-Report-v10.pdf>

Housing Costs and Poverty

We have previously highlighted the links between the welfare reform and austerity agenda and affordability issues within housing – see our answer to Question 1. This has caused, and continues to cause hardship for people and has significant implications for their housing situation and their vulnerability to poverty.

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.⁹⁶

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.⁹⁷ 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.⁹⁸

Joseph Rowntree research⁹⁹ 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

⁹⁶ The Links between Housing and Poverty: An Evidence Review, Joseph Rowntree Foundation, April 2013

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

⁹⁷ 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 \(neriinstitute.net\)](#)

⁹⁸ Northern Ireland Poverty Bulletin 2018-19, NISRA

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

⁹⁹ Poverty in Northern Ireland 2018, Joseph Rowntree, February 2018

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

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 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.¹⁰⁰

Research by the Joseph Rowntree Foundation¹⁰¹ shows that 33% of private renters are in poverty driven by a combination of high housing costs and low incomes. Almost half (46%) of private renters in poverty are pulled into poverty by their housing costs. The research also found that social renters have the highest rate of poverty at 46% reflecting the comparatively lower incomes many social renting households live on and the allocation of social housing based on need.

Joseph Rowntree anticipate that *“housing trends are likely to continue to have a negative effect on poverty levels. Re-freezing of LHA limits support for private renters, while above inflation social rent increases will eat into incomes of social renters.”* These are key considerations for affordability within housing supply and must form an integral part of this Strategy involving effective inter-departmental and cross-departmental working.

To conclude some of the women we spoke to gave their opinion on what Government needs to do in relation to housing supply and these comments are provided below:

“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.”

¹⁰⁰ 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 \(neriinstitute.net\)](#)

¹⁰¹ UK Poverty 2022: The essential guide to understanding poverty [UK Poverty 2022: The essential guide to understanding poverty in the UK | JRF](#)

“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.”