



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

Response to: 'Proposals for a new regulatory framework for social housing providers in Northern Ireland: a consultation document'

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**Prepared by:
Dr Caroline Walsh
Women's Support Network
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, which is funded by the Department for Social Development in Northern Ireland and the Department of Agriculture and Rural Development in Northern Ireland.

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 working 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 (WCD)
- Foyle Women's Information Network (FWIN)

1.3 The Consortium will be 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 support. The Consortium will ensure that there is a continuous two way flow of information between government and the sector. It will ensure that organisations/centres and groups are made aware of

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

consultations, government planning and policy implementation. In turn, the Consortium will ascertain the views, needs and aspirations of women in disadvantaged and rural areas and take these views forward to influence policy development and future government planning, which will ultimately result in the empowerment of local women in disadvantaged and rurally isolated communities.

1.4 This response is informed by women's views and perspectives articulated at consultation events organised collaboratively by Greenway Women's Centre, FWIN, Women's Centre Derry, Women's Support Network and Women's Tec between 11 and 14 May 2015. Appendix 1 provides further detail on this engagement.

2. General comments

The Women's Regional Consortium appreciates the opportunity to respond to the Department for Social Development's 'Proposals for a new regulatory framework for social housing providers in Northern Ireland: a consultation document'.²

As research affirms, by correlating to outcomes in health, job creation, social mobility, participation in the public sphere, economic prosperity/growth, education, child development and community cohesion, the provision of affordable, safe, stable and adequate social housing can positively impact well being at the level of the individual, the household, community and society at large.³ Accordingly, the notion of such housing remains a fundamental component of social justice discourse and delivery in the Northern Ireland case, as beyond.

² Department for Social Development, 'Proposals for a new regulatory framework for social housing providers in Northern Ireland: a consultation document', DSD: Belfast, 2015.

³ On this, see, for example, Houses of Parliament Parliamentary Office of Science and Technology, 'Housing and health', *Postnote*, 371, January 2011, Houses of Parliament: London; California Department of Housing and Community Development 'Housing and family economic well-being', CDHCD: Los Angeles: 2013; K. Wardrip et al., 'The role of affordable housing in creating jobs and stimulating local economic development: a review of the literature', Centre for Housing Policy, Washington: 2011; and, Centre for the Study of Social Policy, 'Affordable housing as a platform for improving family well-being: federal funding and policy opportunities', CSSP: Los Angeles: 2011.

Broadly, that discourse encompasses substantive questions of tenant well being and interests normatively articulated in the language of, inter alia, inclusion, equality, recognition and rights fulfilment. Addressing these questions in meaningful ways at the level of government calls in part for an appropriately robust, statutorily-supported and strategically-directed system of social housing regulation, underpinned by effective institutional processes, procedures, policy and practice in respect of accountability, monitoring, inspection, reporting, enforcement and tenant redress.

From this perspective, we welcome the consultation exercise as affirmation of the Executive's intent to address the regulatory requirement for '[future] rules and standards [in Northern Ireland], which [will] ensure that social landlord and tenant services are maintained and delivered at the right level'.⁴ That said, we have a number of concerns about the claimed potential of the proposals to deliver on this front.

Underlying these concerns is consideration of the possible implications of certain interacting contextual factors, which may conceivably restrict that potential. These factors are as follows: the cumulative and gendered impact of extended austerity on tenant vulnerability and protection;⁵ persistent unmet differentiated housing need/demand; accountability and transparency in a proposed regulatory context of reduced inspection; shifts in rent 'affordability', as impacted by potential increases in tenant vulnerability, poverty and problematic debt associated with welfare reform and extended austerity;⁶ and, the nature of the relationship between social housing and community safety and well being.

⁴ DSD, op. cit.

⁵ See, for example, A. Power et al., 'The impact of welfare reform on social landlords and tenants', JRF, London: 2014; L. James and J. Patiniotis, 'Women at the cutting edge: why public sector spending cuts in Liverpool are a gender equality issue', Liverpool John Moores University; Fawcett Society, 'The impact of austerity on women, policy briefing', Fawcett Society: London, 2012; and, Scottish Government, 'The gender impact of welfare reform', Scottish Government: Edinburgh: 2013.

⁶ See, for example, Power et al., op. cit. also, G. Whitfield, 'Poverty and problematic debt: what can housing providers do? Summary', JRF, London: 2013.

Participant discussion across the engagement events underlined these concerns and raised a plethora of associated issues, as will be shown in the remainder of the paper.

3. Specific comments

Austerity and vulnerable women: tenant protection

3.1 The Consortium is concerned that the regulatory framework under review should be sufficiently enabling to provide for the future protection of vulnerable tenants in the jurisdiction under extend austerity, including social security changes proposed within the Welfare Reform Bill (Northern Ireland) 2012.

Research affirms the adverse and disproportionate impact that ongoing austerity in the United Kingdom, including welfare reform, has had on the everyday lives of vulnerable cohorts, including a disproportionate adverse impact on vulnerable women.⁷ The latter has been characterised in terms of ‘making many women poorer and less financially autonomous’,⁸ exacerbating both in-work poverty and variants affecting workless households, while therein having a ‘devastating impact on women’s equality, safety and well being’.⁹

Although they remain unaffected by the proposed bill’s content, vulnerable women in Northern Ireland have still been disproportionately impacted by other fully implemented aspects of wider austerity, including tax and benefit reconfigurations¹⁰ as well as cuts to public services. On this view, the proposed reform could potentially augment pre-existing austerity-aggravated vulnerability among affected women cohorts in the jurisdiction.¹¹ And,

⁷ J. Portes and H. Reed, ‘Austerity has hit women, ethnic minorities and the disabled most’, *The Guardian*, 31 July 2014. See also, for example, Fawcett Society, op. cit; and, Scottish Government, op. cit.

⁸ Fawcett Society, op. cit., p.3.

⁹ James and Patiniotis, op. cit., p.12.

¹⁰ Changes that fall into this category include the child benefit freeze from 2011 to 2014, and 1 per cent uprating from 2014 to 2016; the lowering of the proportion of childcare costs within working tax credit; removal of the baby element of child tax credits; the stipulation that lone parents on income support with a youngest child aged 5 or 6 should move to job seekers’ allowance; and, the cessation of the health in pregnancy grant; Scottish Government, op. cit.

¹¹ See B. Hinds, ‘The Northern Ireland economy: women on the edge? A comprehensive analysis of the impacts of the financial crisis’, WRDA: Belfast, 2011.

research further affirms that social housing tenants 'are particularly hard hit' by welfare reform,¹² characterising that impact in terms of poverty, anxiety, problematic debt, rent arrears, health problems as well as the threat of eviction and homelessness.¹³

This particular convergence of correlations under wider austerity clearly renders urgent the question of shifts in 'affordability' of rents,¹⁴ particularly among disproportionately impacted vulnerable women. Anecdotal accounts of such shifts were widely reported by discussants and further - welfare reform attributed - shifts were projected. In respect of the latter, particular emphasis was placed on potential issues of affordability around older people affected by housing benefit penalisation, and younger people excluded from housing benefit qualification altogether by virtue of age restriction.

Crucially, however, research has also identified potential ways in which registered social housing providers might help mitigate the adverse impact of wider austerity on tenant vulnerability by developing an 'anti-poverty approach' in housing management planning and delivery,¹⁵ for example, through formulating 'more holistic solutions' to address problematic debt and rent arrears.¹⁶

The consultation document partially characterises the rationale for social housing regulation in terms of an obligation to protect tenants, ensuring that 'the needs of ... vulnerable adults will be adequately considered'.¹⁷ The substantive point here is this: proper fulfilment of that obligation would reasonably require that this question of mitigation be sufficiently provided for within the regulatory framework under review.

¹² Power et al., op. cit., p.1.

¹³ Ibid.

¹⁴ Ibid.

¹⁵ Whitfield, op. cit., p.1.

¹⁶ Ibid., loc. cit.

¹⁷ DSD, op. cit., p.21.

Recommendation

In taking forward its proposals on tenant protection, government should ensure that the attendant regulatory discourse takes seriously enough the question of provider mitigation in the projected context of austerity-aggravated tenant vulnerability, with a particular emphasis on due regard for vulnerability among disproportionately impacted marginalised women cohorts.

Enhanced regulation: addressing diverse housing needs

3.2 The regulatory debate at hand should properly address the question of unmet social housing need across different kinds of vulnerable cohorts.

As previously implied, a dearth of social housing can adversely impact well being outcomes at the level the individual, the household, the community and society at large.¹⁸ And, this correlation contributes to the positioning of social housing as a fundamental consideration in the wider social justice debate. In the Northern Ireland case, that dearth is evident in ‘substantial’ unmet social housing demand.¹⁹ Of course, it is not only the extent but also the nature of social housing undersupply that is of concern in social justice discourse, hence the appeal within that discourse for *affordable, safe, stable and adequate variants*.

The notions of ‘affordable’, ‘safe’, ‘stable’ and ‘adequate’ may obviously be contrastingly interpreted and understood across different kinds of vulnerable constituencies, reflecting competing housing needs, interests and perspectives. The differentiated nature of reported unmet demand for social housing in the jurisdiction across engagement events reflects this reality. Vulnerable cohorts identified by participants as affected by perceived gaps in provision included different kinds of groups marginalised in multiple ways, such as ethnic minority women; lone parents, including those with special needs children; women with ‘complex needs’, such as those with a disability and/or ill-health, including dementia and conflict-associated mental ill health;

¹⁸ Supra note 3 pertains.

¹⁹ NIHE, ‘Waiting lists’, NIHE, Belfast: 2015 [Online]. Available at: http://www.nihe.gov.uk/waiting_lists

women offenders seeking reintegration into the community; and, individuals in so-called 'mixed marriages' seeking accommodation in what was termed ostensibly 'neutral' areas.

Against this backdrop, the reported typology of underprovided stock ranged from bungalows and family homes through to one bedroom accommodation. Underprovision was identified across rural, urban and town sites, but categorised as particularly pronounced rurally. Discussants subsequently explored the question of the impact of that undersupply on tenant and household well being. Most commonly, that impact was characterised in terms of mental and physical ill health affecting both adults and children, such as stress associated with overcrowding.

The document does set out a consumer standard, which encompasses a provider commitment to deliver 'premium homes with good service quality choices appropriate to the *diverse needs* of... tenants', including the needs of vulnerable adults.²⁰ However, for reasons already outlined, that commitment should be suitably enhanced to take specific and proper account of different kinds of vulnerability among existing and prospective tenants across all section 75 categories, including multiple disadvantage.

Recommendation

In developing the framework under review, the Consortium urges the Executive to give further consideration to the relationship between enhanced regulatory functions and provider recognition and accommodation of diverse housing needs across differentiated vulnerable cohorts.

Regulation and community well-being/safety

3.3 Research affirms that the availability of affordable, adequate and stable social housing is a 'foundation' for individual/family well being,²¹ economic prosperity and, in turn, 'thriving' and 'safe' communities.²² In seeking to

²⁰ DSD, op. cit., p.21.

²¹ Centre for the Study of Social Policy, op. cit.

²² CDHCD, op. cit.

'protect tenants', it is essential that the developed regulatory framework take due cognisance of, and meaningfully provide for, this correlation.

The document's consumer standard does, of course, commit providers to 'concentrate effort to support vibrant communities that encourages tenant opportunities and promotes well-being'.²³ Yet, participants universally and anecdotally evidenced the claim that fulfilment of that task *would first require significant behavioural and policy change at the level of the provider, accompanied by more robust mechanisms of inspection and accountability at the level of the regulator.*

That evidence entailed the identification of a plethora of provider behavioural issues reported as either directly or indirectly impacting community well being and safety: poor planning around the location of housing stock associated with tenant experience of infrastructural and service shortfalls in respect of, inter alia, childcare, health, education, transport, recreation and community support; 'sub-standard' maintenance and repair services affecting both individual dwellings and shared spaces, including inadequate inspection of completed sub-contract work; unsatisfactorily addressed problematic living conditions, most notably unresolved dampness compounded by 'expensive/poor' heating systems; unaddressed environmental health implications of derelict properties and nuisance implications of properties used as so-called 'dole drops'; unsuitable and ineffectual processes for dealing with anti-social behaviour and its relationship to the so-called legacy of the conflict, contributing to a 'ghettoization' of areas; inadequate tenant complaint and redress systems; unsatisfactory housing allocation and prioritisation procedures; and, a general lack of meaningful tenant engagement to deal with all of the above. This last point was starkly captured by one discussant thus: 'the only time [providers] want to communicate is when you are behind with the rent' (Women's Centre Derry focus group).

²³ DSD, op. cit., p.21.

Correlations were made between these issues and tenant welfare. For example, stress was the most commonly reported consequence of unresolved issues of this kind, with some affected women depicted as at times ‘feel[ing] isolated, intimidated, stigmatised and discriminated against’ (Women’s Centre Derry focus group).

Such critique led to the emergence of a broad bipartite consensus across the engagement events according to which: first, ‘when developing social housing, organisations *[should] look at more than just bricks and mortar*’ (FWIN focus group); and, second: ‘housing providers *[should] treat people with [due] respect*’ (Women’s Centre Derry focus group).

Participants subsequently proposed a number of remedial actions for stakeholders to take due account of these issues within the regulatory debate at hand. These proposals included appeals for enhanced accountability and transparency at the level of policy and practice; improved complaints, maintenance and inspection processes; more meaningful tenant engagement, to include consultation at the planning/design stage; improved inter-agency collaboration to address anti-social behaviour, to include more meaningful inclusion of community stakeholders; and, the sponsoring of capacity-building to facilitate the participation of vulnerable women within tenant fora.

Recommendation

The Consortium urges the Executive to ensure the framework under review takes seriously enough the relationship between provider behaviour and community safety, providing sufficiently robust mechanisms to take proper account of any and all provider default and negligence on this front, to include the aforementioned reported practices.

Enhanced accountability and transparency

3.4 The document points out that while the current regulatory framework for social housing in the jurisdiction focuses on providers’ compliance with process, through a combination of guidance setting, on-site inspection and auditing, by contrast, the proposed framework would regulate provider activity

principally by ‘focus[ing] on how providers and the sector as a whole identify and manage risk’ to efficiency and effectiveness in social housing delivery.²⁴

It is a matter of some concern that this shift to a risk based model will directly impact both the level and type of inspections, ultimately reducing the number carried out:

the regulator will always retain the need to conduct on site inspections *[however] these should reduce and will eventually be targeted only in cases where there are known issues.*²⁵

The potential danger of less inspection is, of course, less detection of non-compliance. And, for reasons already outlined and as participants anecdotally evidenced, extant tenant demand would seem to be in favour of more rather than less inspection or rather, more enhanced inspection underpinned by more effective accountability.

Recommendation

As it takes forward these proposals, the Executive should commit to giving due regard to any risk to standard adherence and accountability inherent in the notion of reduced inspection under the proposed risk based model.

4. Conclusion

A context of extended austerity places obvious and well rehearsed constraints on the realisation of government interventionism. Yet, as the government’s own research affirms: ‘given the scale and impact of ... indicators of unmet housing need and affordability’ *government intervention ‘remains essential to meeting the housing needs and aspirations of a large section of the population’*, particularly the most vulnerable.²⁶ And, as has been shown in this paper, the satisfaction of such needs and aspirations can correlate with well being at the level of the individual, the household, the community and society at large.

²⁴ DSD, op. cit., p.23.

²⁵ Ibid., p.25.

²⁶ Department for Communities and Local Government, ‘Impact assessment for affordable rent’, Department for Communities and Local Government, London, 2011, p. 13.

Accordingly, it has been argued that what is at stake in this debate is a substantive social justice question. The consultation provides the potential to address this question in more meaningful ways than has hitherto been the case in the jurisdiction, and that potential should be fully exploited by government.

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Appendix 1
Summary: focus group detail

Focus groups: facilitation, locations and dates

- WSN-facilitated event, Women's Tec, Belfast, 11 May 2015
- WSN-facilitated event, Greenway Women's Centre, Belfast, 12 May 2015
- FWIN-facilitated event at its Derry premises, 14 May 2015
- Women's Centre Derry-facilitated event at its own premises, 14 May 2015

Participants' profile summary

Overall composition: included some venue staff, board members, volunteers, service users; and, more generally, women living and working in different disadvantaged and rural localities and those in social housing, including parents, young and older people as well as some individuals either with a disability or from an ethnic minority background.

