

A Response to: Consultation on Changes to the Housing Selection Scheme

Issued by: Housing Executive

November 2012

Introduction

1.1 The Women's Support Network (WSN) welcomes the opportunity to respond to this consultation.

1.2 The Women's Support Network (WSN), established in 1989, is a regional organisation that works across all areas of Northern Ireland. It includes in its membership community based women's centres, groups and organisations, with a concentration in disadvantaged areas. WSN is a charitable and feminist organisation, which adopts a community development approach. We provide a range of support and services to 63 community based women's centres, projects and infrastructure groups and 26 associate members drawn from across the community and voluntary sector who support women, families and communities. (see Appendix 1).

1.3 Our members provide a wide range of women-centred front line services across Northern Ireland, including:

- Specialist Advice
- Childcare and Family Support
- Counselling, Support and Advocacy
- Complementary Therapies
- Training & Education
- Health & Wellbeing Programmes
- Personal Development & Employment Support
- Volunteering, Leadership & Empowerment

1.4 WSN aims to achieve social, political and economic justice through the promotion of the autonomous organisation of women. The Network aims to strengthen the collective voice of women's groups and to promote and develop networking opportunities, to enable collective action and to impact upon policy and decision making processes. WSN provides an accessible, feminist, relevant and high quality support service and resource for its member groups. The Network is also an important information resource on issues relevant to community based women's organisations and for other infrastructure groups, nationally and internationally.

1.5 Over the past 30+ years, the community based women's sector has developed a range of front-line services such as childcare, support, advice, and education & training services in response to the needs they identified at a grass roots level. Women's groups continue to meet the particular needs of women and their children living in areas considered to be some of most affected by the conflict, and recognised as some of the most disadvantaged areas across Northern Ireland today.

1.6 Network members are actively engaged with their local communities, cross-community initiatives and regional structures throughout Northern Ireland.

2. Comments

2.1 The Women's Support Network (WSN), as an organisation representing women's centres, projects and infrastructure groups drawn from across the Northern Irish community, welcomes the opportunity to respond to the Housing Executive's Consultation on Changes to the Housing Selection Scheme.

2.2 WSN understands the Housing Executive's desire to allocate accommodation, as far as is reasonably possible, in line with the Housing Benefit Size Restriction Policy, to mitigate any adverse impacts on new tenants and potential financial hardship and risk of arrears incurring next April 2013 when these charges are due to take effect and we appreciate the need to update and review the current housing selection scheme in light of the ever changing nature of law and society.

2.3 However, the WSN is concerned that, in attempting to bring the housing selection scheme in line with the Housing Benefit Size Restriction, many vulnerable people in society, particularly young single mothers, will ultimately be adversely affected. Prima facie, the new proposals seem to be both considerate and flexible in that they suggest keeping many of the current rules of the Housing Selection Scheme that make allowance for the varying set ups of individuals, for example facilitating access to children and seek to make more improvements in areas like age criteria, vis-a-vis the need for 16 + to have their own room. However, many of the seemingly open and flexible proposals are followed with the phrase 'working age tenants on housing benefits in these circumstances will be advised before they accept the offer that they will need to consider how they would meet any potential shortfall in rent as a result of the potential Housing

Benefit restriction'. It is clear that this phrase is added to ensure that the selection scheme does not offend the Size Restriction Policy and to prepare people for future reductions in benefits. This essentially means that, though the Housing Executive, by deciding to review its selection scheme, is attempting to continue to recognise and address inevitable problems that arise in today's society, like the need for an extra bedroom for a child residing a few times a week with a single person, it fails to acknowledge the real problem behind falling in line with the Size Restriction Policy. That is, the inevitable hardship that will result from this new measure. Many of the proposals on a standalone basis are not inappropriate or unfair. Our understanding of what constitutes a family unit continues to be challenged and ultimately, it is imperative that the Housing Executive understand the need to be more accommodating when it comes to the modern household. The problem resides in the fact that, if any concession by the housing executive is made, for example an extra room is allocated because the Housing Executive identifies a need, a need which is not identified by the restriction policy, that family will be forced to pay out money that they may not have as an under-occupation penalty.

2.4 The under occupation penalty is one of the most disconcerting features of the Welfare Bill, and has the potential to attack many vulnerable people in our society. Many tenants living in homes with one room unoccupied will see a loss of £9.50 a week from their housing benefit, while others with more rooms unoccupied could lose up to £20. Essentially, that means individuals can lose £670 annually. This is a substantial amount of money for those in low-paid employment or indeed unemployed but most especially for single mothers. The reality is that the under-occupancy penalty will hit those who are most vulnerable the hardest. The number of DLA claimants, child poverty and pensioner poverty cases are higher in Northern Ireland than any other part of Great Britain¹. In fact, if comparisons are made using the BHC measure the rate of poverty in Northern Ireland would be higher than anywhere else in Britain². There also exists a high proportion of low-income families with children. Thus, changes to benefits and working tax credits will be felt much more acutely in Northern Ireland than elsewhere. Many families will be unable to take another reduction in their housing benefit. People will fall into hardship, debt and homelessness.

¹ Aldridge, H. Kenway, P. Et Al (2012) 'Monitoring Poverty And Social Exclusion' Joseph Rowntree

² Ibid

2.5 The constant reference to the need for the individual to be aware of the need to meet potential shortfall in rent, if they do require an extra room for anything other than what is specified, prepares people for the reality that they will be forced to pay out money they may not have. However, what if, as an alternative, these people choose to leave their accommodation, as opposed to paying the penalty? Will this be a feasible option? The consultation proposes to make these people a priority. However, the figures from the completed equality impact assessment suggest that 78% of properties are currently under-occupied, meaning that a high number of people will most likely have to consider moving. One of the biggest problems is that, this consultation does not take sufficient cognisance of the fact that a huge percentage of the Northern Irish housing stock consists of three-bedroom houses, and thus, it is inevitable that this proposal, to change the housing selection scheme because of the size restriction policy, will affect many thousands of people and is ultimately not feasible. The over-reliance on houses with three bedrooms or more is matched by a dearth of single tenant accommodation and two-bedroom accommodation. Thus, the problem of where these people, who may have to move, especially those with a special set up (a disabled child, or sick child who might prefer/need a separate room) can actually practically move, becomes a reality. In fact, according to Mr Gerry Flynn (Northern Ireland Housing Executive) there are currently around 26,000 under-occupying tenancies. He stated, at a committee meeting for social development that 'if everybody presented at our door tomorrow morning looking for accommodation that is appropriate to their needs, we would have a major issue to try to deal with that. We would not have the supply to match their needs'³.

2.6 The shortage of properties is compounded in Northern Ireland by the real reality that the social housing stock is segregated. That makes mobility even more difficult. If a high number of families are forced into seeking alternative accommodation, this will have a destabilising effect. The imposition of regulations that are likely to have a destabilising impact is at best inappropriate, given the fact that Northern Ireland has only recently emerged from a most traumatising conflict. It is essential to acknowledge the fact that the reason parity (which is being called for in the NI Assembly) has worked in the past is because, historically, it has not been strictly adhered to, and it allows for a level of flexibility, which takes into account different circumstances here. These fundamental factors

³ 25th October 2012m Welfare Reform Bill: Northern Ireland Housing Executive Briefing

suggest that Northern Ireland is a special case and that it will need a specific solution.

2.7 The WSN is also concerned specifically with the first recommendation that the age criteria for children sharing be amended, meaning that two children of different genders will be expected to share up to the age of 10 years. This proposal fails to acknowledge the kind of society that exists today. In fact, this suggestion completely ignores the reality that children today are growing up much faster. The independent Bailey Review of Commercialisation and Sexualisation of Childhood (2011)⁴ found that 88% of parents think their children are growing up quickly and that children are behaving in an overtly sexual manner before they are old enough to really understand what sexually provocative behaviour means. This stark reality cannot be easily fixed. However, the Housing Executive needs to take cognisance of the fact that, in today's world, children are turning into young adults at a much faster rate and in fact, generally puberty occurs between ages 7 and 13 in girls and ages 9 and 15 in boys. The prospect thus, of having two children of the opposite sex nearing the age of ten sharing a room, becomes alarming.

2.8 The WSN also seeks clarification with regards to the meaning of a bedroom.

A number of Housing Executive properties are currently classed as having three bedrooms when the third bedroom is arguably not suitable as such and thus traditionally termed a box room. There should be an opportunity to reclassify what constitutes a bedroom and the Housing Executive should reconsider the need to take in account the size of the room when an assessment is undertaken.

2.9 As a final remark, the WSN considers it to be essential, if the Housing Selection Scheme is to be changed in accordance with the Size Restriction Policy, that local lettings policies should be reviewed. It would be unacceptable, if the Welfare Reform Bill is passed, to have a situation where, because of local lettings policies, single people are housed in accommodation, like a two bedroom flat, where it is deemed that they are under-occupying and are thus forced to pay the penalty.

⁴ Letting Children Be Children: the Report of an Independent Review of the commercialisation and sexualisation of Childhood, June 2011
<https://www.education.gov.uk/publications/standard/publicationDetail/Page1/CM%208078>

2. Recommendations

3.1 If the proposed changes in the Housing Selection Scheme are implemented, the WSN would request that the Housing Executive keep in the mind that International Human Rights law recognises every individual's right to an adequate standard of living, including adequate housing⁵.

3.2 Furthermore, the WSN would like to point out the need for the Housing Executive to view the house that an individual lives in (whether it is privately owned or social housing) as something more than simply basic accommodation to ensure an acceptable way of life in line with Human Rights Law. For many people, a house is a home filled with memories and experiences. It is a place where parents have watched their children grow and develop, something which is not so easily calculated. Harder to measure still, especially in financial terms, is the support individuals provide each other in the community, through informal care and friendship and the kind of long-term support relationships that are formed by being in a familiar community setting. To remove a person from their familiar environment has a potentially destabilising and unforeseen costly affect. The Transforming Your Care Consultation proposes putting the emphasis back on the community in terms of health and social care and stresses the important role of the carer (formal and informal) in the future of Northern Ireland. In order for this to be possible, the Housing Executive must play its role in preventing the breakdown of community life which will inevitably come about as a result of insisting on the removal of those unable to pay the shortfall in rent due to under-occupying. Due consideration should be given to the financial deficit that will likely ensue if individuals are forced to move to a new area, no longer have family or community support (who often provide care or child minding services) and are forced to apply for formal care or childcare support. For example, according to research conducted by Employers For Childcare Charitable Group, amongst parents of children who have a disability there is a huge dependence on informal childcare (66%) and grandparents are the most common choice. Living in a familiar setting, where relationships have developed and matured over time has all types of long term financial benefits for the economy of Northern Ireland and it behoves the Housing Executive to duly recognise this fact.

⁵ 1966 International Covenant on Economic, Social and Cultural Rights

3.3 If the Housing Selection scheme legally has to fall in line with the Size Restriction Policy, then it becomes of paramount importance, in relation to single people and the elderly, that the Housing Executive commissions an appropriate number of suitable houses or flats to be built, to cater for the growing number of people who live on their own.

3.4 The WSN urges the Housing Executive to acknowledge the reality that discrimination against women in the housing sphere can still be and is caused. Thus, a number of issues should be considered in the screening or equality impact assessment. Discrimination can occur because of policies that fail to acknowledge women's special circumstances (such as their vulnerability to sexual and gender-based violence), the predominance of customary laws and practices that discriminate against women, bias in the judiciary, little or no access to decision-making processes, no awareness or understanding of rights. In Northern Ireland it is clear that discrimination is underpinned by historical factors.

3.5 WSN welcomes the opportunity to respond to this consultation document. We have offered some constructive recommendations as to how it could be improved. We are happy to further discuss this response if required. We would also like to state our intention of revisiting these proposals, with regard to equality and fairness, if the Welfare Reform Bill is introduced, as there is likely to be a number of very pejorative outcomes, if the Housing Selection Scheme does come in line with the Size Restriction Policy, that will affect the lives of many vulnerable women.

For further information, contact:

Riognach Murphy - Policy and Research Co-ordinator

Tel: 028 90236923

Email: policy@wsn.org.uk

MEMBERSHIP 2012

	<u>Member Group</u>
1	All Ireland Mother's Union
2	An Munia Tober (Travellers)
3	Antrim & Ballymena Women's Aid
4	Ardmonagh Women's Group
5	Ardoyne Women's Group
6	ATLAS Women's Centre
7	Al Nisa Women's Group
8	Ballybeen Women's Centre
9	Ballymurphy Women's Group
10	Belfast & Lisburn Women's Aid
11	Belvoir Women's Improvement Group
12	Carrickfergus Women's Forum
13	Carew II
14	Causeway Women's Aid
15	Chrysalis Women's Centre
16	Clan Mor Women's Group (Sure Start)
17	Derry Well Woman
18	Derry Women's Centre
19	Falls Women's Centre
20	First Steps Women's Group
21	Footprints Women's Centre
22	Foyle Women's Aid
23	Foyle Women's Information Network
24	Granaghant District Women's Group
25	Greenway Women's Centre
26	Kilcooley Women's Centre
27	Lesbian Advocacy Services Initiative
28	Lesbian Line
29	Lenadoon Women's Group
30	Ligoneil Family Centre
31	Link Women's Group
32	Manor Women's Group
33	Markets Women's Group
34	NI Women's Aid Federation
35	NI Women's European Platform
36	Fermanagh Women's Network
37	Newry & Mourne Women
38	Newtownabbey Women's Group
39	Older Women's Network NI
40	Omagh Women's Aid
41	Rape Crisis Centre
42	Rasharkin Women's Group
43	Shankill Women's Centre

44	Strabane & Lifford Women's Centre
45	Strathfoyle Women's Centre
46	The Learning Lodge
47	Voices Women's Group
48	Waterside Women's Centre
49	Windsor Women's Centre
50	Women Connect Project
51	Women into Politics
52	Women's Information Group
53	Women's News
54	Women's TEC
55	Women 2 Gather
56	Women's Resource & Development Agency
57	WISPA (Women in Sport & Physical Activity)
58	Ardcarn Women's Group
59	OIYIN Women's Group
60	Mossley Women's Institute
61	Mount Vernon Women's Group
62	Coole New Opportunities
63	North Belfast Womens Initiative & Support Project
	<u>Associate Members</u>
1.	Ballymena Community Forum
2.	CiNI
3.	Community Relations Forum
4.	East Belfast Community Partnership
5.	Employers for Childcare
6.	HIV Centre (Women's Support Group)
7.	Mencap
8.	National Women's Council of Ireland
9.	Playboard
10.	RNIB (Women's Group)
11.	Good Morning Newtownabbey
12.	Monkstown Community Association
13.	WAVE Trauma Centre
14.	WEA
15.	Parents Advice Centre
16.	Templemore Community Action Group
17.	Gingerbread
18.	Larne Community Development Project
19.	Community First Coaching
20.	Changing Faces
21.	Sands NI
22.	Women's Project Ashton Centre
23.	Women on Track
24.	Matt Talbot Women's Group
25.	Ulster People's College
26.	Council for the Homeless NI

