

Women's **Policy Group NI**

WPG NI Response to Housing **Supply Strategy**

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1. Introduction:

The Women's Policy Group (WPG) is a platform for women working in policy and advocacy roles in different organisations to share their work and speak with a collective voice on key issues. It is made up of women from trade unions, grassroots women's organisations, women's networks, feminist campaigning organisations, LGBTQ+ organisations, migrant groups, support service providers, NGOs, human rights and equality organisations and individuals. Over the years this important network has ensured that there is good communication between politicians, policy makers and women's organisations on the ground.

The WPG uses our group expertise to lobby to influence the development and implementation of policies affecting women. The WPG is endorsed as a coalition of expert voices that advocates for women in Northern Ireland on a policy level. This group has collective expertise on protected characteristics and focus on identifying the intersectional needs of all women; in line with international human rights mechanisms.

The organisations represented in this response have extensive experience and expertise through working with a range of groups impacted by the upcoming Housing Supply Strategy including; women, girls, trans men, non-binary people, disabled people, bisexual and lesbian women, victims of domestic abuse, victims of rape and sexual assault, rural women, those with dependants, migrant women and more.

This evidence submission will highlight the evidence compiled by the WPG in recent years and will make several recommendations in relation to specific aspects of the Housing Supply Strategy. This evidence is a joint submission from several WPG members including:

- Women's Resource and Development Agency
- Women's Support Network
- Women's Regional Consortium
- HERe NI
- Northern Ireland Women's European Platform (NIWEP)
- Northern Ireland Women's Budget Group (NIWBG)
- Committee on the Administration of Justice
- UNISON

If you have any questions or queries about this evidence submission, or would like the WPG and the relevant membership organisations involved in this joint submission to discuss this evidence further, please contact Rachel Powell, Women's Sector Lobbyist, at: rachel.powell@wrda.net.

2. Endorsements

The WPG would like to endorse the responses submitted to this consultation by Housing Rights NI and the Women's Regional Consortium. These organisations have significant experience and expertise working directly with people in Northern Ireland who are impacted by issues relating to housing supply.

3. WPG Evidence

Several members of the Women's Policy Group have been campaigning on issues relating to this Strategy for decades. The WPG has published a wide range of evidence through various evidence submissions, public consultation responses and specific briefings on issues relating to this Strategy. This section will provide a brief overview of evidence published to date by the WPG and its members.

3.1 Past Consultations Responses: Domestic Abuse and Family Proceedings Bill (2020)

The WPG submitted a response to the Domestic Abuse and Family Proceedings Bill in 2020¹. In this response, we provided evidence of the need for granting secure tenancies in cases of domestic violence and abuse. The following paragraphs have been taken from this response.

¹ WPG (2020) 'WPG NI Evidence Submission to Justice Committee: Domestic Abuse and Family Proceedings Bill 2020' Available at: <https://wrda.net/wp-content/uploads/2020/06/WPG-NI-Evidence-Submission-to-Justice-Committee-05.06.20.pdf>

For many women who have left or are ready to leave domestic abuse situations, housing is a major concern. Domestic abuse is a leading cause of homelessness. One study conducted by a homeless shelter found that, of their female clients, 50 percent had experienced domestic abuse². Given that most domestic abuse victims are women, and because women have differential access to housing, due to their differential position within the labour market,³ this must be considered a gendered issue.

Making the decision to leave an abusive relationship is extremely difficult for many victims and survivors of domestic abuse and they should not be confronted with potential homelessness as a result. Survivors should not have to choose between their personal safety and making themselves and their children homeless, yet in many cases, this decision can mean the difference between a woman leaving a relationship or staying.

It is accepted that the most dangerous time for a woman experiencing abuse is when she is making steps to or is about to leave her partner. The Femicide Census 2018 identified that 41% of women killed by their partner that year had separated or taken steps to separate from him.⁴ Therefore, it is important that women have secure places to live when they have made the decision to leave. Specialised, secure, and appropriately funded refuges are key to ensuring that women have somewhere to turn when faced with these circumstances. These are wrap-around services that can support a woman through this time as well as give her a safe place to live.

In 2018/19, 654 women and 421 children stayed in Women's Aid refuges across Northern Ireland. It is essential that these services receive secure funding that rises incrementally with the cost of living so that they may continue to support women through refuge accommodation.

² Save Lives: Ending Domestic Abuse (2018), 'Safe at Home: The Case for a Response to Domestic Abuse by Housing Provider', (available online) <<https://www.gentoogroup.com/media/1571446/2018-03-28-web-ready-safe-at-home-report.pdf>> [Accessed 03.06.20].

³ Netto, Pawson and Sharp (2009), 'Preventing Homelessness due to Domestic Violence: Providing a Safe Space or Closing the Door to New Possibilities?', *Social Policy & Administration* (available online) <<http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.911.4996&rep=rep1&type=pdf>> [Accessed 03.06.20].

⁴ Femicide Census 2018 (available online) <<https://femicidescensus.org/about/>> (Accessed 03.06.20).

A period of sustained austerity has resulted in cuts across the third sector. No refugees in Northern Ireland have had an uplift to budgets for 12 years, meaning that rising costs have been managed with the same money and charities have had to find additional funding to cover costs. In their Concluding Observations on the UK in 2019, the Convention on the Elimination of Discrimination Against Women (CEDAW) Committee identified austerity cuts to funding to specialised services for women as a major concern.⁵ These cuts cannot be allowed to continue, particularly as we look towards another financial crisis post COVID-19. Specialised services for domestic abuse must be secured financially and any domestic abuse legislation should reflect that.

The WPG would like to register concern at potential changes to social housing allocation, with the introduction of a policy that would allow the NIHE to offer private rentals on par with social housing and have these considered a reasonable offer. There are many reasons why social housing is beneficial to women who have experienced domestic abuse, not least the opportunity for longer tenancy agreements as opposed to the traditional year to year tenancies associated with private rentals. The opportunity of longer tenancies gives women and their children stability and a chance to rebuild their lives after abuse. We are concerned that private rentals will not afford women this stability. There are further concerns surrounding changes to housing allocation moving from a points-based system to a band system. We would stress the importance of ensuring that victims of domestic abuse are considered priority for rehousing.

This policy could also see changes to the amount of times a victim can refuse a “reasonable offer” of housing before they are discharged from NIHE services. We would argue that what is considered a reasonable offer by the NIHE may not be reasonable at all, particularly for people with disabilities who already face barriers to accessing services. Furthermore, changes to social housing have a disproportionate impact on women given that they are “overrepresented amongst social renters, largely because they are overrepresented amongst those in housing need and amongst homeless families.”⁶

⁵ CEDAW Concluding Observations (2019) CEDAW/C/GBR/CO/8

⁶ UK Women’s Budget Group, ‘Housing and Gender’ (available online) <https://wbg.org.uk/wp-content/uploads/2017/11/housing-pre-budget-nov-2017-final.pdf>

The social housing sector already understands how domestic abuse presents and how it impacts on victims who are largely women. Moving away from that model will have a detrimental effect on victims and survivors of domestic abuse.

3.2 Women's Regional Consortium Evidence

The Women's Regional Consortium is a member of the WPG and has a long history of campaigning and collecting evidence on issues relating to women and housing in Northern Ireland. The WPG would like to highlight some of the evidence provided by the Women's Regional Consortium which illustrates the importance of taking a gendered lens to housing policy. The following paragraphs have been taken from the Women's Regional Consortium Response to the Call for Evidence by the Department for Communities on the Housing Supply Strategy in summer 2021.⁷ This content from the Women's Regional Consortium illustrates the gendered nature of housing supply:

Women are particularly vulnerable to issues around housing availability and affordability because women have lower incomes and lower levels of wealth than men, making it more difficult for them to secure adequate housing on their own. Women's ability to afford their own home or to rent privately is determined by their access to paid employment and to social security benefits. As previously stated, women are more likely to be in low-paid, part-time and insecure work as well as being more likely to claim social security benefits. 59% of Housing Benefit claimants are women⁸ 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,

⁷ Women's Regional Consortium (2021) 'Response to: Housing Supply Strategy – Call for Evidence' Available at:

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2021/08/Womens-Regional-Consortium-response-to-Housing-Supply-Strategy-Call-for-Evidence-Submission.pdf>

⁸ Information provided in an email to Women's Support Network from the DfC in November 2020

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."⁹ 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 Department for Communities 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.

3.3 UNISON Evidence

In 2020, UNISON conducted a survey exploring the housing issues faced by people across the UK,¹⁰ which gained a total of 774 survey respondents. The four primary concerns identified by these respondents included:

- High cost of housing
- Impact of COVID-19 on housing costs and living standards
- Quality of housing
- Commuting costs

⁹ Women's Budget Group (July 2019) 'A home of her own, Housing and Women.' Available at: <https://wbg.org.uk/wp-content/uploads/2019/07/WBG19-Housing-Report-full-digital.pdf>

¹⁰ UNISON (2021) 'Housing Survey: Key Findings' Available at: <https://www.unison.org.uk/content/uploads/2021/03/Housing-Survey-Key-Findings-.pdf>

In regards to the high costs of housing and how this affects living standards, their research showed that:

- 27.8% said the cost of housing is making them look elsewhere to live and work – a figure that rises to 48.2% for health workers in the private rented sector,
- 60.8% said they were really struggling to manage financially or are just about managing,
- Housing costs are up to £300 a week for 14.4% of people,
- 9.2% say their housing is unsatisfactory, but it is all they can afford,
- 11.8% say they want to move but can't afford to,
- 10.1% say their adult children cannot afford to move out or find a place of their own.

UNISON also found that issues associated with housing costs were exacerbated as a result of the pandemic, causing many people to defer mortgage payments, struggle to pay household bills and putting some at risk of eviction and homelessness. Issues associated with quality of housing were particularly apparent for those in the private rented sector (PRS), with 100% of those renting in the PRS saying that their landlord does not maintain their home to an adequate standard.

In relation to the PRS, according to UNISON, the housing and homelessness charity 'Shelter' found that 43% of families with children living in the Private Rented Sector worry that they will lose their home and that "there are 1.7 million families with dependent children now living in the Private Rented Sector." UNISON also highlighted that "younger private renters spend 45% of their household income on their rent and lone parents with dependent children 42%. Private tenants have low resilience, with 63% of those under 65 having no savings."¹¹

Respondents from UNISON's survey (2020) reported that the main measures they would like to see being put in place by government were:

- Do more to address the housing shortage of affordable homes,
- End the five-week wait for universal credit and housing benefit.

¹¹ UNISON (2020) 'Housing Manifesto' Available at: <https://www.unison.org.uk/content/uploads/2020/01/UNISON-Housing-Manifesto-JANUARY-2020-FINAL.pdf>

Other measures UNISON advocate for include:

- Introduce legislation to set fair rents and limit increases in the private rented sector,
- Suspend evictions/repossessions for the duration of the pandemic,
- Put in place clear guidance on how rent arrears can be minimised, through clearer guidance to landlords backed by legislation,
- Give tenants longer to pay back rent arrears,
- Raise local housing allowance (housing benefit) to cover average rents in local areas,
- Scrap no-fault evictions by introducing indefinite, permanent tenancies,
- Lift the caps on property size restrictions on housing benefit for private renters.

Throughout the pandemic, the government made several calls for people to, where possible, stay at home and work from home. However, the ability of people to do so varied significantly depending on one's living situation. As UNISON highlights, for many people, home was not a suitable or appropriate place for them to work. The WPG would like to endorse the following comments made by UNISON in their 'A Decent Place to Live' report, in relation to the impact of the pandemic on housing issues:¹²

"The common thread to emerge was that the 'stay at home' message for many people meant staying in homes that were palpably unsuitable. The inadequacy of space in which to work, the poor quality of many existing homes, where families struggled to have an area for their children to use for home education, let alone decent internet connectivity to enable that learning. Young workers sharing houses in multiple occupation had no escape from bedrooms that doubled as offices, and many people were unable to properly shield because they had no option but to share kitchens and bathrooms with strangers. The pandemic has peeled back the veneer of what 'stay at home' has really meant to millions of UK citizens."

¹² UNISON (2021) 'A Decent Place to Live' Available at:
<https://www.unison.org.uk/content/uploads/2021/07/A-decent-place-to-live-updated.pdf>

Other findings from UNISON's research report 'A Decent Place to Live' (2021) show that:

- Private Rented Sector (PRS) rent levels outstrip earnings with the PRS doubling since 2000 leaving 97% of social renters with a gap between local housing allowance and rent.
- A 27–30 year old would need 18 years to save for a deposit as house-prices continue to outstrip earnings.
- The lack of regulation on Private Rented Sector rents means the only solution is to increase the supply of homes for social rent.
- The lack of affordable homes to both rent and buy means workers are struggling to live near their work in large swathes of the UK.
- The COVID-19 health pandemic has exposed the poor quality of UK homes, with a growth in younger workers living in Houses in Multiple Occupation, which have expanded by 20% since 2013, demonstrating that housing quality is being neglected in the approach to delivering units to maximise yield to the private sector rather than much-needed new homes.

The WPG concurs with UNISON that “only significant direct financial investment in building new homes... will enable housing needs to be met, allowing workers to access an affordable home.”

4. WPG Feminist Recovery Plan

4.1. Overview of WPG Feminist Recovery Plan:

The WPG NI COVID-19 Feminist Recovery Plan¹³ highlights the disproportionate impact of the pandemic on women and makes several recommendations for addressing this impact. The Plan also provides detailed evidence of pre-existing gender inequalities in our society, which have become exacerbated as a result of the pandemic. The Plan covers a wide range of topics, including housing, violence against women, health inequalities and women's poverty, within six main Pillars: Economic Justice, Health, Social

¹³ Women's Policy Group (2020) 'WPG COVID-19 Feminist Recovery Plan' Available at: <https://wrda.net/wp-content/uploads/2020/07/WPG-NI-Feminist-Recovery-Plan-2020-.pdf>

Justice, Culture, Brexit, Human Rights and a Bill of Rights, and International Best Practice.

The WPG relaunched the COVID-19 Feminist Recovery Plan in July 2021 with updated evidence and recommendations,¹⁴ including findings from primary research conducted by the WPG on the impact of the pandemic. Both the original and relaunched versions of the COVID-19 Feminist Recovery Plan provide comprehensive roadmaps regarding how the NI Executive could not only address the disproportionate impact of COVID-19 on women, but also address the structural inequalities existed before the pandemic that led to such a disproportionate impact on women. A summary of recommendations from the Relaunched WPG Feminist Recovery Plan can be accessed [here](#).

The WPG Feminist Recovery Plan provides a comprehensive evidence base that illustrates how women are impacted by housing supply and related issues. The issues, evidence and recommendations made by the WPG within the Feminist Recovery Plan, and the other work of the WPG and its members, is crucial to fully addressing issues relating to housing supply in Northern Ireland.

4.2. Relevant content from WPG Feminist Recovery Plan

The WPG would like to reiterate some of our evidence and recommendations relating to the gendered aspect of housing supply from the WPG Feminist Recovery Plan in this section.

4.2.1. The Bedroom Tax (Section 1.4.4. Of Feminist Recovery Plan)

The WPG acknowledges that legislation aimed at closing welfare mitigations loopholes is currently progressing through the Northern Ireland Assembly. However, we would still like to highlight the importance of the mitigations and the need for Bedroom Tax reform in this section, as there continues to be issues with the supply of the housing needed to allow people to escape from the Bedroom Tax.

¹⁴ Women's Policy Group (2021) 'WPG COVID-19 Feminist Recovery Plan: Relaunch – One Year On' Available at: <https://wrda.net/wp-content/uploads/2021/07/WPG-COVID-19-Feminist-Recovery-Plan-Relaunch-One-Year-On.pdf>

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 reform¹⁵. This included important mitigation payments around the Benefit Cap and Bedroom Tax as well as providing some help around Universal Credit. The New Decade, New Approach Agreement¹⁶ 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 Social Sector Size Criteria, more commonly known as the 'Bedroom Tax,' took effect in Northern Ireland in February 2017. It reduces Housing Benefit or Universal Credit payments for people who live in Northern Ireland Housing Executive (NIHE) or Housing Association properties that are deemed to have more bedrooms than they need. Mitigation payments were put in place in Northern Ireland to fully mitigate the effects of the Bedroom Tax until March 2020 and have since been extended. However, the Bedroom Tax is subject to a loophole in that mitigations will currently be lost if a household moves to another social home where they under-occupy to the same or a greater extent than in their previous property. Available figures show that 227 households had lost this important protection, losing an average of £50 per month,¹⁷ and heightening their risk of housing stress and homelessness.

This policy is likely to have greater impacts on women for a number of reasons. In particular, women have more reliance on social security benefits, the majority of single parents are women, recent Housing Benefit claimant numbers show that 59% of claimants are female, and women who are employed are often located in low paid sectors. An increase in benefit claims as a result of the pandemic has led to an increase in the number of households affected by this policy in Great Britain. While many households in Northern Ireland are currently protected from the impacts of this policy through the

¹⁵ Welfare Reform Mitigations Working Group Report, Professor Eileen Evason, January 2016. Available at: <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm/welfare-reform-mitigations-working-group-report.pdf>

¹⁶ New Decade, New Approach, January 2020. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856998/2020-01-08_a_new_decade_a_new_approach.pdf

¹⁷ AQW11061/17-22, asked by Mark Durkan MLA, answered 10/12/20 <https://bit.ly/2SQd6pd>

mitigations, the rising numbers of benefit claimants will leave more families vulnerable to the loophole.

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.

4.2.2 A Feminist and Human Rights-Based Recovery (Section 1.8 of Feminist Recovery Plan)

The right to housing, shelter or appropriate accommodation is covered extensively by many international treaties and human rights bodies. Article 25 of the Universal Declaration of Human Rights (UDHR) and Article 11(1) of the International Covenant on Economic, Social and Cultural Rights (ICESCR) include the right to housing as part of the right to an adequate standard of living. This is expanded upon in the Yogyakarta Principles¹⁸, which cover the application of human rights law in relation to sexual and gender minorities. The Principles state:

“Everyone has the right to adequate housing, including protection from eviction, without discrimination and that States shall a) take all necessary legislative, administrative and other measures to ensure security of tenure and access to affordable, habitable, accessible, culturally appropriate and safe housing, not including shelters and other emergency accommodation, without discrimination on the basis of sexual orientation, gender identity or material or family status; b) take all necessary legislative, administrative and other measures to prohibit the execution of evictions that are not in conformity with their international human rights obligations, and ensure that adequate and effective legal

¹⁸ The Yogyakarta Principles (2006) Available at: http://yogyakartaprinciples.org/wp-content/uploads/2017/11/A5_yogyakartaWEB-2.pdf

or other appropriate remedies are available to any person claiming that a right to protection against forced evictions has been violated or is under threat of violation, including the right to resettlement, which includes the right to alternative land of better or equal quality and to adequate housing, without discrimination.”

Despite this right being comprehensively covered in human rights law, its application on the ground and interpretation by party states - including the UK and, more specifically, Northern Ireland - has been significantly lacking. Housing is commodified: land to be bought and sold, turned for a profit, or squeezed for as much overhead as possible. Instead of being treated as a right it is a privilege, one to be paid for and one which can be taken from you with little warning. However, even within this flawed commodified housing model, there are ways in which the situation could be drastically improved to better serve our communities, especially those who are homeless or living in precarious housing situations.

Those who find themselves homeless are too often moved on from public spaces by the PSNI and the support that is provided often attempts to address symptoms of the problem - such as mental illness and substance misuse - rather than addressing the issue of the lack of homes in the first instance. This “treatment first” approach places an expectation on our homeless population to deal with mental and physical health problems, drugs and alcohol misuse, poverty, and unemployment, without first having a home from which to action this recovery.

In a two year trial assessing the effectiveness of a “Housing First” policy combined with Assertive Community Treatment (ACT) to support those with mental health issues who were homeless or in precarious living situations, Housing First was seen to improve the mental and physical health of those who were engaged in the pilot and worked to eradicate homelessness in a much quicker time. It also encouraged community cohesion and the integration of these individuals into their communities and society, something sorely lacking for our homeless population currently.

The main problem with applying this policy in Northern Ireland is the availability of social housing stock. Currently there are approximately 807,812 houses in Northern Ireland . According to the Department for Communities, the average household contains 2.5 individuals, and the total housing stock per

1,000 NI residents is 422. In an ideal world, this would be enough houses to accommodate everyone in Northern Ireland, eradicating homelessness in the region. However, only 10% of current housing is rented by the NIHE, with 70% of housing stock being privately owned and 15% privately rented. Given the 38,725 people on the NIHE waiting list for housing, this model clearly isn't working.

Of the 7,314 houses having completed construction in Northern Ireland from 2019-2020, only 710 of those are adding to our social housing stock. There is an urgent need to adopt quotas requiring the building of adequate levels of social and affordable housing in any new major accommodation development. There is also a need for a monumental buy-back scheme, focusing on those holding ownership over multiple properties. Introducing steep and progressive taxes on multiple property ownership and using the revenue generated to launch a wide-ranging property buy-back scheme would clamp down on landlord monopolies and dramatically increase our social housing stock. Rent controls, particularly in urban and urbanising areas, would also be necessary to ensure the cost of multiple-property taxation isn't passed on to tenants renting from large housing monopolies.

Despite private renting being the most accessible form of housing for young people, those in precarious working arrangements, and those escaping domestic abuse or violence, etc, it is the most expensive form of housing due to the sheer volume of private rental accommodation. In Northern Ireland, the average weekly spend on housing costs varies massively depending on the type of housing you are accessing: £97 for private renters, £82 for social renters and £46 for those buying with a mortgage. It is very clear that, especially for young women working in underpaying/undervalued sectors such as retail, hospitality, and care work, the housing market simply is not fit for purpose, and the idea of buying a house and affording a mortgage deposit seems very out of reach for so many of our young people.

This has a specifically negative impact on women, LGBTQI+ people, black and minority ethnic (BME) people, disabled people, and working-class people generally, often leading to an inability to access housing and engage with this marketised model. Many of these groups experience homelessness in disproportionate levels, often stemming from experiences of financial or other means of coercive control, domestic or sexual violence, and/or discrimination from private landlords. Many individuals are also trapped within coercive and

abusive situations, in the knowledge that if they were to attempt to leave, they would be at the mercy of an unforgiving housing market, with limited access to specialised support or refuges specific to their community.

Encouraging profiteering through multiple property ownership, leading to the exploitation of renters and the seizure of housing stock, not only ensures the build-up of wealth at the top of our society, but also generates artificial housing shortages and housing anxiety, which disadvantages working communities. This means that individuals and families are stuck in unsuitable and unstable housing, or no housing at all. While there is no one-size-fits-all approach that will fully address these issues, and no quick fix to entirely restructure the economy and move away from a commodified property system, there are common-sense policies which can be adopted to drastically increase social housing stock, tackle the rampant exploitation of private renters, and provide everyone with a home, from which they can live and grow.

In the long term, decommodifying the housing system would remove the significant rent pressures on the most vulnerable in society. Paying for housing and property upkeep through taxation instead of inflated and unpredictable rent requests - which often line pockets instead of going towards upkeep - should be the end-goal of our move towards a Northern Ireland where each individual and family are housed appropriately, fulfilling any accessibility requirements, and tackling the propensity for abuse through financial and housing coercion. There is also a need for specific, culturally competent and community-led domestic and sexual abuse refuges, in particular for BME communities and LGBTQI+ communities who are often unable to access mainstream refuges or support services.

While the process of ground-up housing reform is long and requires significant political investment, it will ensure that the right to housing is respected in our state, and will provide an example of the positive change that can come through the recovery from COVID-19 to other administrations in Ireland and the UK, as well as further afield.

4.2.3 Impact of Austerity and Welfare Reform on Women

It is important to note the context in which women's economic inequality is situated. The government's response to the 2008 financial crash was to introduce a series of austerity and welfare reform measures. These reforms included the introduction of Universal Credit, the replacement of the Disability

Living Allowance (DLA) with PIP, the introduction of the Benefit Cap and the 'Bedroom Tax', a freeze on benefits for four years and the introduction of the 'two-child' limit.

Research suggests that these policies had a disproportionate impact on women, showing that 86% of the savings to the Treasury from the tax and benefit changes since 2010 have come from women.¹⁹ This is due to a range of societal factors that make women more vulnerable to these policies. Women are more likely to claim social security benefits, more likely to use public services, more likely to be in low-paid, part-time and insecure work, more likely to be caring for children/family members and more likely to have to make up for cuts to services through unpaid work. The cumulative effect of these reforms has been felt by women, particularly the most vulnerable women including those on the lowest incomes.

Research by the Women's Regional Consortium²⁰ details the struggles many women in Northern Ireland have faced with austerity policies and illustrates that these women continue to feel the negative effects of austerity and welfare reform many years after these policies were introduced. This impacts their ability to afford food and essentials for their children and families and also their mental and physical health, wellbeing and personal relationships.

Local analysis of the impact of these reforms by the Northern Ireland Human Rights Commission (NIHRC) also showed the negative impacts of the welfare reform measures on certain groups.²¹ It highlighted that, across most income levels, the overall cash impact of the reforms is more negative for women than for men. The research showed that women lose more on average from these reforms than men mainly because they are more likely to be receiving benefits and tax credits than men. Their most striking finding was that households with children experience much larger losses as a result of the reforms than those without children. This is particularly the case for lone parents (in Northern

¹⁹ Estimating the gender impact of tax and benefit changes, Richard Cracknell, Richard Keen, Commons Briefing Papers SN06758, December 2017 <https://bit.ly/3wQvrRN>

²⁰ Impact of Ongoing Austerity: Women's Perspectives, Women's Regional Consortium, March 2019 <https://bit.ly/35OWtge>

²¹ Cumulative impact assessment of tax and social security reforms in Northern Ireland, NIHRC, (November 2019): <https://bit.ly/3qhxRq0>

Ireland, 91% of lone parents are women²²) who lose £2,250 on average, equivalent to almost 10% of their net income.

The NIHRC analysis looked at how these reforms would impact on poverty levels and showed that overall, they are forecast to increase relative child poverty (before housing costs) by 8%, household poverty by just over 2% and adult poverty by just over 1%. It highlighted significant increases in the relative child poverty rates for children in lone parent households after taking account of the reforms with the rate estimated to increase by over 22% (before housing costs) and 18% (after housing costs).

There are strong links between female poverty and child poverty. The pandemic has increased the negative impacts of poverty felt by women and children. Women who were already struggling are now under even more financial pressure as they, their children and families are pushed further into poverty as a result of the pandemic.

4.3. Feminist Recovery Plan Primary Research Findings

As part of the relaunch of the WPG Feminist Recovery Plan in July 2021, the WPG conducted primary research on the impact of the pandemic on women in Northern Ireland. This research involved conducting one-to-one interviews with women and launching a survey that collected both qualitative and quantitative data. The interviews were used to develop anonymised case studies on various topics such as mental health, disability, abortion, racism, domestic abuse, poverty and debt. The findings from this research were compiled in a research report titled 'Putting Women's Voices at the Core.'²³

During the interviews, several participants discussed their experiences of struggling to access adequate housing and these were reflected in the anonymised case studies which can be found in the research report between

²² Census 2011 – Key Statistics for Gender, Research and Information Service Research Paper, Ronan Savage and Dr Raymond Russell, Northern Ireland Assembly, 5 September 2014 <https://bit.ly/35JxlaX>

²³ Women's Policy Group (2021) 'WPG COVID-19 Feminist Recovery Plan Supplementary Research Report: Putting Women's Voices at the Core' Available at: <https://wrda.net/wp-content/uploads/2021/07/WPG-Feminist-Recovery-Plan-Research-Report-Womens-Voices-at-the-Core.pdf>

pages 4 and 32. Sections of the relevant case studies, relating to housing, have been included below from Samantha, Adele and Lisa.

Samantha

Samantha is a mother of two and is also a full-time carer for a disabled person. Samantha has been in temporary accommodation for approximately four years and the pandemic has meant that the waiting list for acquiring permanent housing has been extended. Samantha was told by her housing officer that in order to be moved to permanent housing, “your window would have to be put through, one of you would have to be attacked, or you would need to get pregnant again”...

Samantha linked issues relating to her housing situation with her mental health and eating disorder. She felt that her housing situation was something that she had no control over, and that it was this feeling of lack of control that caused her to seek control in unhealthy ways in other areas of her life, such as her eating habits. She said: “It’s scary to me to think that I would be using food like that; to think it’s the only thing in my life that I have control over. Because I can’t control my housing situation. I can’t control anything that’s going on around me. I can’t seem to get help when I’m asking for it. So, it’s the one thing I can control, and I seem to be doing it without realising, which is really, really scary.”

Adele

When the pandemic began, Adele and her husband did not have savings and were in a small amount of debt, which meant that they had nothing to fall back on when her business was forced to close and their household income was consequently reduced. This forced Adele and her family to rely on government support and loans from family members to ensure that essential bills could be covered, such as for food and rent...

Although the support from the NI Government was extremely helpful, this money barely covered Adele’s essential bills. With her business closed and her husband’s income reduced to 80% of its pre-pandemic level, once Adele’s rent and food had been paid for, most of this money was gone.

Lisa

Lisa's husband was physically, psychologically, financially and spiritually abusive towards her, with their marriage being characterised by high levels of coercive control. Her husband controlled the couple's finances and would take and spend all of their money as soon as it was received. This meant that Lisa had no money of her own to buy food or other necessities. Lisa described being extremely hungry, walking the streets, hoping to find a pound coin on the pavement that she could use to buy some food.

Lisa's case study reflects the concerns previously raised in this response relating to the importance of available housing for victims of domestic and sexual abuse. For domestic abuse victims who have experienced financial abuse, they may not have any rights to the house they live in and have nowhere to go if they make the decision to leave. This makes it harder for them to leave abusive situations due to a fear of financial insecurity and homelessness. For this reason, it is crucial that victims can access refuges in these circumstances.

4.4. Feminist Recovery Plan Recommendations:

- Adopt a 50/50 social/private quota for new housing developments, enshrining the creation of more social housing in law.
- Introduce progressive taxation on multiple-property ownership, targeting landlord monopolies and multinational investors scooping up housing stock.
- Launch a wide-ranging property buy-back scheme, funded through taxation on multiple-property-ownership.
- Introduce targeted rent controls across Northern Ireland, particularly in urban and rapidly urbanising areas where rent is steadily climbing.
- Adopt a "Housing First" policy to support homeless populations, focusing on providing housing and socio-economic stability as a means to addressing the other issues they may be experiencing.
- Improve & expand council powers to reprimand landlords/estate agents for maintaining unsuitable accommodation (i.e. those where tenants are living in unsuitable conditions or the property is not upkept).
- Establish an expert inquiry into housing reform in Northern Ireland, with the aim of moving to a de-commodified housing system.

5. General Comments on the Housing Supply Strategy

The WPG believes that housing is a key equality issue that must be addressed as part of wider efforts to eradicate inequality in our society, in all its forms. Access to adequate and affordable housing impacts the degree to which one can fully and equally participate in society. For example, having an address is important for voting and accessing benefits. As highlighted above, levels of housing supply in a society are inextricably linked to rates of homelessness. Therefore, cross-Strategy working should be encouraged between those involved in the development of the Housing Supply Strategy and the Homelessness Strategy.

5.1 International Mechanisms and Standards

The UK is a State Party to the Convention on the Elimination of Discrimination Against Women (CEDAW). This Convention is one of the core UN human rights treaties, and sets the international standard for gender equality and women's rights. As a State Party to the treaty, the UK has obligations in international law, which are monitored on a four-yearly basis. It is also worth noting that, as a State Party to the Universal Declaration of Human Rights, the UK has an obligation to ensure all people in the UK have access to safe, warm and affordable housing.

CEDAW provides a framework for States Parties to progressively implement gender equality, which include protection from all types of discrimination and ensuring that the needs of women and girls are taken into account in policy making. In the 2019 Concluding Observations on the examination of the UK under CEDAW, a key recommendation is that protections for women in Northern Ireland are put on an equal footing with those elsewhere in the UK, with concern expressed that effective measures must be taken to ensure that women in vulnerable situations have effective access to housing.²⁴ The

²⁴ 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)). Available at: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GBR/CO/8%20&Lang=En

Committee also recommends that the State Party should take measures to enable asylum-seeking and refugee women to access appropriate housing.²⁵

CEDAW General Recommendations further clarify obligations under CEDAW, and General Recommendation (GR) 34 on rural women emphasises that this includes developing housing that meet the specific needs of rural women as well as international housing rights standards, and including rural women in housing and rural development. GR34 also stresses the importance of protecting women from evictions.²⁶ GR35 on gender based violence similarly stresses wraparound support for victims of gender based violence, including access to affordable housing.²⁷

The Istanbul Convention, which is the Council of Europe framework for ending violence against women and girls, also emphasises that the specific needs of victims of gender based violence, in particular domestic abuse, must be considered in housing supply and support must consider survivors' overall needs and therefore²⁸ go beyond provision of refuges and other temporary forms of housing. The women's sector has significant concerns regarding delay in ratifying the Convention, which in part are due to legislative gaps in Northern Ireland relating to protection of women and girls from gender based violence; however, recent legislative developments across the UK mean that legislation is now nearing compliance with the Istanbul Convention, which will enable ratification. It is essential that this strategy takes account of the provisions in the Convention, to enable effective implementation when ratification is complete.

5.2 Experiences of Housing in Northern Ireland

5.2.1 Lack of existing data

It is difficult to fully capture the experiences of women in Northern Ireland, in regards to housing supply, due to the lack of gender disaggregated data

²⁵ Ibid.

²⁶ CEDAW General Recommendation 34 (2016) [Rural Women](#)

²⁷ CEDAW General Recommendation 35 (2017) [Gender based violence](#)

²⁸ Council of Europe Treaty Series 210 (2011) [Explanatory Report to the Council of Europe Convention on preventing and combating violence against women and domestic violence](#)

available in the region. This issue was highlighted in a recent report by the Expert Advisory Panel on a Gender Equality Strategy.²⁹ This report referred to data gaps across a range of areas for many of the Section 75 protected characteristics including gender. The expert panel stressed that “this is an issue of critical concern and one which requires urgent action.” The WPG are particularly concerned about the lack of data on ethnic minority women and LGBTQI+ women, who face significant inequalities in society and require tailored support and services in relation to housing.

This is an important consideration for the 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. For example, there is a lack of gender-disaggregated data on Universal Credit claimants in Northern Ireland. 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 Department for Communities as this data would help the Department determine the extent and nature of the help being given for meeting housing costs.

The WPG agrees with the Women’s Regional Consortium that:

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 is no mechanism to report transphobia which means that information and the experiences of trans people are not reflected. This underlines the importance of robust data collection in this area to gain a better insight into the inequalities that exist for the trans community. This

²⁹ Gender Equality Strategy, Expert Advisory Panel Report, December 2020
<https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusionstrategy-gender-expert-advisory-panel-report.pdf>

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.

5.2.2 Experiences of LGBTQIA+ community

While this strategy focuses on housing, it is impossible to discuss housing without considering the circumstance of those who need homes. As outlined in the response, Domestic Abuse can lead to homelessness, as well as other safety concerns and poverty. We would welcome targeted support for LGBTQ+ people who are homeless after fleeing domestic abuses, which may be from an intimate partner or other family member. There are two small LGBT+ domestic violence refuges in England, both in the London area³⁰, outside of this, the refuges that do offer LGBT+ inclusive spaces equate to less than 1% of the available refuge spaces³¹. This issue has caused victims of domestic violence to be trapped in their home with their perpetrator as there are no other available options open to them.

The potential for LGBT+ refuge provision should be explored. While LGBT+ women may be welcome in existing women's shelters, they may not feel comfortable accessing this support due to a fear of 'coming out' and homophobia and transphobia. There is limited provision for victims who are men, regardless of sexual orientation.

One of the common experiences of domestic abuse for LGBT+ people is alienation from friends and family orchestrated by the perpetrator. Many LGBT+ people also experience alienation from unaccepting family and friends when they come out. This alienation can leave young LGBT+ people less likely to have a suitable person to share a home with, which is penalised under the current welfare system. Research with older LGB (lesbian, gay, bisexual) people over 55 found they were more likely to live alone than heterosexual people; 41 per cent live alone compared to 28 per cent of heterosexual people.³²

³⁰ SafeLives (2018). *Free to be safe : LGBT+ people experiencing domestic abuse*. [online] Available at: [https://safelives.org.uk/sites/default/files/resources/Free to be safe web.pdf](https://safelives.org.uk/sites/default/files/resources/Free%20to%20be%20safe%20web.pdf) [Accessed 3 Jun. 2020]

³¹ Women's Aid (2017) 'Nowhere to Turn: No Woman Turned Away Project' Available at: <https://www.womensaid.org.uk/wp-content/uploads/2019/12/NWTA-2017.pdf>

³² Refuge Charity - Domestic Violence Help. n.d. *Culturally Specific Services - Refuge Charity - Domestic Violence Help*. [online] Available at: <https://www.refuge.org.uk/our-work/our-services/culturally-specific-services/> [Accessed 3 June 2020].

UK wide research found that young LGBT+ people make up 24% of the total of homeless youth; 69% of LGBT+ homeless individuals have experienced abuse, violence or rejection by their family and 77% of LGBT+ youth are of the belief that their sexual orientation or gender identity factored in their rejection by family.³³ St Mungo's,³⁴ a charity supporting homeless people, has an LGBT pathway, which includes six spaces reserved for trans individuals and a further nine spaces for people who identify as LGBTQ+ and nine for women only, this is again in the London area. We would welcome exploration of LGBT+ emergency accommodation.

It is important that those who have left their home because of homophobia or transphobia are not considered 'voluntarily homeless'. The Rainbow Project Housing Support Officer has noted a case where a LGBTQ+ person was denied Full Duty Applicant (FDA) status by NIHE after their family forced them to leave home, and NIHE decided that they were 'voluntarily homeless.' The decision was later overturned but this was an avoidable process.

LGBTQ+ sector experience raises the following issues for service users :-

- There is a general lack of knowledge of how to access housing support. The Housing Executive is perceived as not being particularly helpful or approachable for many LGBTQ+ people.
- There is a fear of homophobia or transphobia when accessing statutory services, this may be real or perceived. There should be training for social housing providers on issues like language and terminology.
- Often young LGBTQ+ people will seek to move from rural areas to cities, as that is where LGBTQ+ services are located such as the Belfast and Foyle LGBT Centres, as well as distancing themselves from an unwelcoming home environment.
- Lack of sufficient data across S75 groups – There must be a concerted effort made to obtain sufficient relevant data right across the S75 groups, especially for groups with specific needs such as LGBTQ+ - If there is no relevant data it is difficult to identify need especially as victims are often fearful of reporting intimidation.

³³ Stonewall (2011) '*LGB People In Later Life*.' [online] Available at: <https://www.stonewall.org.uk/system/files/LGB_people_in_Later_Life_2011_.pdf> [Accessed 3 June 2020].)

³⁴ St. Mungo's (2022) [Webpage] <https://www.mungos.org>

- People have also been intimidated from the homes by criminal elements in homophobic hate crimes, which are not always reported to the PSNI. Here NI are aware of one lesbian couple with a young child intimidated out of social housing by paramilitaries in the past 18 months.
- Ongoing research by the Rainbow Project has highlighted that criminalisation has led to sex workers being more likely to face eviction by landlords, they should be considered in the 'preventing homelessness' work.
- While tangential to this strategy, LGBTQ+ Asylum Seekers must have dedicated provision.

5.2.3 Experiences of ethnic minority and migrant communities

Racist hate incidents and crimes are frequently linked to housing and housing intimidation. The Equality Commission for Northern Ireland's 'Key Inequalities' report (2017) found that the homes of minority ethnic people and migrant groups may be vulnerable to racial attacks.³⁵ PSNI statistics show that since 2016/17 racist hate incidents have now overtaken sectarian incidents in Northern Ireland indicating that this is a growing issue.³⁶

Racist hate crimes and housing intimidation in Northern Ireland are often linked to paramilitary control, with paramilitaries targeting homes on the basis of racism, as part of exercising control over communities as a whole. The Independent Monitoring Authority (IMA) reported in 2019 that they had heard evidence from groups and individuals who perceived racist hate crimes against them to have had a paramilitary dimension³⁷. These reports included people who had been intimidated out of housing.

³⁵ Equality Commission (2017) 'Key Inequalities in Housing and Communities in Northern Ireland – Summary Report' Available at: <https://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/HousingCommunities-SummaryReport.pdf>

³⁶ PSNI (2020) 'Trends in Hate Motivated Incidents and Crimes Recorded by the Police in Northern Ireland 2004/05 to 2019/20' Available at: <https://www.psni.police.uk/globalassets/inside-the-psni/our-statistics/hate-motivation-statistics/2019-20/hate-motivated-incidents-and-crimes-in-northern-ireland-2004-05-to-2019-20.pdf>

³⁷ Independent Reporting Commission (2019) and (2020) 'Second Report' and 'Third Report' Available at: https://www.ircommission.org/sites/irc/files/media-files/IRC%20-%202nd%20Report%202019_0.pdf and <https://www.ircommission.org/sites/irc/files/media-files/IRC%20Third%20Report.pdf>

The current practice of public bodies such as the Housing Executive is to move victims to another area rather than dealing with the perpetrator. This has come under criticism from organisations who wish to see the root causes of paramilitarism and racism tackled in communities. In 2017 a Thematic Review of Policing Race hate crime by the Northern Ireland Policing Board stated: “hate crime will not be addressed unless and until all agencies are able and willing to acknowledge and discuss the issues, including the reported threat from paramilitary groups targeting minority ethnic communities.”³⁸

6. Responses to Survey Questions

This section of our response will consider specific areas of the Strategy that the WPG believe could be strengthened based on evidence from other countries and international best practice.

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?

Vision and Timeframe

The WPG is content with the proposed vision and timeframe (15 years) for the Strategy. However, we agree with colleagues in the women’s sector and wider human rights sector that this could be strengthened. For example, Housing Rights NI and the Women’s Regional Consortium argue that there should be a review mechanism included in the Strategy to facilitate flexibility. The WPG agrees with this argument and also supports the call made by organisations such as HERe NI that the vision for this Strategy should include reference to houses being ‘safe’ in addition to being good quality, affordable and sustainable.

³⁸ NI Policing Board (2019) ‘Thematic Review of Policing Racist Hate Crime’ Available at: <https://www.nipolicingboard.org.uk/sites/nipb/files/media-files/race-hate-crime-thematic-review.PDF>

Objectives

The WPG is generally content with the proposed objectives for the Strategy but would suggest that some proposed objectives are strengthened. We appreciate that the second proposed objective (preventing homelessness and reducing housing stress) was amended in line with recommendations by Housing Rights NI, that the objective should be to *prevent* homelessness, not merely *reduce* it.

In regards to the sustainability objective (Objective 5), we would like to see a commitment by the Department to gender-proofing all sustainability measures. Gender-proofing in this regard refers to applying a gender lens to all decision-making (analysing and screening for potential adverse impacts on women). The WPG agrees with the need to “reduce whole-life carbon emissions from both new homes and existing homes and support a ‘just transition’ to carbon neutrality” and would like to endorse the following comments by UNISON in relation to this:

“As we emerge from the COVID-19 pandemic, there is a real opportunity to take-up the slack created in the economy to inject public sector led investment in social housing. New homes, that are green homes, can generate spending in supply chains, jobs and reskilling displaced workers from industries that have either not survived the pandemic, or are simply hanging on by a thread. A green-growth investment plan, in a new generation of council homes, may be the very route-map to post COVID recovery that ministers have promised.”³⁹

Women have been disproportionately impacted by the climate crisis (for a number of reasons, one of which being that women were already more likely to live in poverty) and it is essential that any efforts to tackle the climate crisis involve addressing this disproportionate impact and preventing any further negative impacts. As a result of gender segregated labour markets, women are also less likely to work in sectors which are set to benefit from increased government investment in ‘green jobs,’ such as technology and engineering. This has the potential to exacerbate existing gender inequalities in regards to

³⁹ UNISON (2020) ‘A decent place to live’ Available at: <https://www.unison.org.uk/content/uploads/2021/07/A-decent-place-to-live-updated.pdf>

women's employment and financial security. As the Women's Regional Consortium explain:

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

There is therefore a need to acknowledge existing gender imbalances to ensure that women and men can equally benefit from the opportunities the green economy can provide. A failure to do so will result in the continuation of existing gender inequalities and prevent the achievement of the Sustainable Development Goals.⁴⁰ 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."⁴¹

The gendered nature of the climate crisis and crisis recovery planning has been recognised in the Climate Change Bill which recently passed the Committee Stage in the NI Assembly. The Bill includes an amendment that includes reference to gender in the just transition provisions and a recommendation in the Committee report that the Executive gender-proof all policies coming out of the Climate Action Plans. The WPG would like to see a similar recognition included in the Housing Supply Strategy.

In regards to the quality and affordability objectives (Objectives 1 and 3), we would also like to echo calls by the Women's Regional Consortium to give

⁴⁰ United Nations Sustainable Development Goals: <https://sdgs.un.org/goals/goal5>

⁴¹ Gender Equality and Green Jobs, International Labour Organization Policy Brief, 2015
wcms_360572.pdf (ilo.org)

particular focus to the private renting sector, which is particularly vulnerable to affordability and housing quality issues.

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 15 high level long term policies and interventions?

The WPG generally agrees with the focus of these 15 high-level long-term policies and interventions. However, in relation to policy/ intervention xv⁴², the WPG would like to emphasise that this should be pursued through a gendered lens. This means recognising and addressing the gendered impacts of the climate crisis through this 'just transition,' and applying a gendered lens to all decision-making.

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?

The WPG agree with the proposed enabling principle and would like to endorse the following comments made by the Women's Regional Consortium:

"It is not possible to separate issues around housing supply from other related issues such as poverty, deprivation, access to social security benefits, low-paid and insecure work, access to childcare, transport and health/leisure services. These issues must be considered as part of this Strategy and a lack of action to tackle these societal issues will undoubtedly impact on housing issues. Therefore, cross-departmental and inter-departmental working is essential in order to effectively transform housing supply in Northern Ireland."

⁴² Policy/ intervention xv.: Support the vision and objectives of the Green Growth and Energy Strategies, with an emphasis on improving the energy efficiency of homes and ensuring a just transition to decarbonised solutions.

Measurement

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

The WPG agrees with the proposed ambition to deliver 100,000 plus homes over the 15 year lifespan of the Strategy and agree with Housing Rights that at least one third of these should be social homes. The delivery of these 100,000 homes should be done with the intention to direct resources towards those most in need. As mentioned previously in this response, there should be an ongoing review mechanism to allow flexibility with the delivery of the Housing Supply Strategy. For example, this target could be monitored and reviewed every 1-3 years by the Department.

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

The WPG would like to defer to our colleagues in Housing Rights as experts in this area for this question.

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

The WPG suggests that any measurement of success and progress should be based on the experiences of those who have or have not benefited from the outcomes of the Strategy. This could be done by adding a separate indicator of lived experiences or by incorporating the perspectives of those with lived experiences into the measurement process. In particular, the experiences of those from Section 75 groups such as disabled people, migrant families, LGBTQIA+ people should be included as a way of measuring success and progress. In order to do this, the Department must have access to reliable and up-to-date data on these lived experiences.

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?

The WPG welcomes the opportunity to participate in the delivery and oversight of the Supply Strategy, as a group that represents several organisations within the women's sector and human rights sector more generally. The WPG regularly engages with Department officials on the delivery and oversight of policies and strategies and believe that cross-sector working is crucial to delivering positive change for the people of Northern Ireland.

There are several ways that the Department can best ensure that key strategic partners can participate in the delivery and oversight of the Housing Supply Strategy. The WPG recommends that the Department commits to more cross-departmental working, more partnership working with non-governmental bodies and engages directly with people with lived experience of the issues in all aspects of the delivery of the Strategy. The WPG also agrees with UNISON that this partnership working should include meaningful engagement with local councils, who should be empowered with meaningful control of planning and place-making outcomes.⁴³

In regards to engaging with the voluntary and community sector, the Women's Resource and Development Agency (WRDA) has produced a [guide](#) for public authorities when engaging with women through public consultation. This guide is titled 'Putting Women at the Heart of Public Consultations'. Recommendations from this guide are also relevant for how Department officials can meaningfully engage with women and the voluntary and community sector, more generally. Some of the main points raised in this guide include:

- Design and plan engagement opportunities that are responsive to women's needs and the practical and social barriers they face.

⁴³ UNISON (2020) 'A decent place to live' Available at: <https://www.unison.org.uk/content/uploads/2021/07/A-decent-place-to-live-updated.pdf>

- Set the tone of the engagement in a way that deals with the legacy of women's lack of access to formal decision-making processes.
- Review how your sessions are advertised and think about how accessible they appear to women from disadvantaged communities.
- Keep your language accessible and relevant. It's vital that what is presented for consultation is easy for the public to understand.
- Whatever your policy is aiming to achieve, make it meaningful and relevant if you want to get women's views on how it might affect them.
- Make women visible in the product as well as the process. Highlight the gendered nature of an issue being addressed by public policy.
- Policies and strategies should take the inequalities and differences between men and women into account and make them visible.

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?

No.

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?

The WPG supports the view that local communities must be engaged in housing supply to create sustainable, thriving and inclusive communities. The WPG believes that it is crucial to put the voices of those with lived experiences

at the heart of policy-making, by engaging with them meaningfully in the design and implementation of policy that will directly impact them.

There are several examples of positive citizen engagement with housing supply in Northern Ireland led by community organisations. UC:Us is a community organisation that provides support to those who are claiming Universal Credit.⁴⁴ The campaign is led by people who have lived experience claiming Universal Credit and does partnership working with other experts in this area, such as Law Centre NI and Housing Rights NI.

The PPR Housing campaign is another example of positive engagement with local communities on the issue of housing.⁴⁵ This campaign uses its platform to elevate marginalised voices and works with partner organisations across the UK and abroad to ensure that these voices are heard.

Women's Centres in Northern Ireland have a long history of engaging and working directly with women in local communities on issues that affect their daily lives, such as, housing, debt, poverty and mental health. The Maternal Advocacy and Support (MAS) Project is a new project run in partnership between the Women's Resource and Development Agency and Women's Centres across Northern Ireland. The focus of this project is perinatal health and it aims to provide peer support for groups of women who are experiencing perinatal mental health problems. It also provides a platform for women to talk about their experiences in the healthcare system. These lived experiences are then used to advise on areas that could be developed to improve services for women in Northern Ireland.

For more advice on how to meaningfully engage with women in communities in policy development, please see WRDA's guide to engaging with women, as referenced under Question 7.

Equality

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

⁴⁴ UC:Us (2022) [Webpage] Available at: <https://www.ucus.org.uk>

⁴⁵ PPR (2022) [Webpage] Available at: <https://www.nlb.ie/campaigns/right-to-home>

We would like to endorse the following comments by Housing Rights NI in relation to the importance of including all Section 75 groups in the design and implementation of the Housing Supply Strategy:

“In line with the spirit of the s75 Northern Ireland Act, it is crucial that the Department works to meaningfully involve these groups in the design, development and delivery of the strategy in order to ensure their needs are met when it comes to Housing in NI over the next 15 years.”

The WPG generally agrees with the findings of the EQIA but would like to raise some issues that we have identified.

1. Lack of understanding of gendered nature of issues

Although the EQIA provides findings for each group with protections under Section 75 of the Northern Ireland Act, there is a lack of recognition of the gendered nature of issues raised in the EQIA. For example, it is recognised that:

“Households with children were more likely to be in the private rented sector, particularly lone parent households with children (45%). This is perhaps aligned to the finding in the 35F 36APS Expert Panel Report that more low-income families with children are now living in the private rented sector with higher rents and poorer conditions than if they were accommodated in the public sector.

The HCS 2016 also found an increasing trend of households with children in the private rented sector. Lone parents with children were also slightly more likely to be in social housing (35%) than single adults without children (25%). Two-household families without children were the least likely to be in social housing (11%).”

However, it is not acknowledged that women make up the majority of lone parents (91% of single parents are women), which makes them more likely to be a low-income family (which is more likely to live in the private rented sector or social housing).

2. Lack of data on ethnic minority community

The WPG would like to raise concerns about the lack of data on ethnic minority communities in Northern Ireland. This shortfall is recognised by the Department in the EQIA in several places. For example, the Department notes

that robust conclusions regarding the allocation of social housing for ethnic minorities cannot be established, due to having too small a sample size. The Department also notes that the availability of official statistics on ethnic minorities is limited and therefore they cannot draw conclusions about the adequacy of housing for these communities.

The adequacy and availability of data is extremely important for accurately determining the issues and needs of particular societal groups. Without reliable and comprehensive data on the experiences of ethnic minorities with housing in Northern Ireland, it is impossible to establish how they will be impacted by this Housing Supply Strategy and what further action is required to support them.

3. Lack of understanding of intersectionality

There is also a lack of understanding regarding the intersectional harms faced by those who fall into multiple Section 75 groups. For example, ethnic minority women, disabled women, and LGBTQIA+ women. The EQIA addresses the differing impacts of this Strategy on Section 75 groups but does not consider the ways in which those who fall into several of these groups will be impacted. This shortfall is recognised by the Department in the EQIA but the WPG would like to reiterate the importance of taking an intersectional approach to all policies aimed at reducing social inequalities.

American lawyer and scholar, Kimberlé Williams Crenshaw, introduced the theory of Intersectionality in 1989 and coined the term in 1993. This extremely influential theory explains how overlapping identities relate to systems and structures of oppression, domination or discrimination. The main argument behind this was that the experience of a black woman cannot be understood in terms of being black and of being a woman, as independent parts of her identity, but must include the interactions between the two, which can compound and reinforce each other. We believe that this theory of intersectionality is crucial to understanding the experiences of women and marginalised groups more generally.

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

No.

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

It is not clear from the EQIA document what the 'immediate next steps' are and therefore we cannot comment on this aspect of the document.

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?

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

We would like to endorse the following comments included in the response submitted to this consultation by the Women's Regional Consortium. This section was co-developed by the Women's Regional Consortium and the Northern Ireland Rural Women's Network (NIRWN), who are both members of the Women's Policy Group.

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.⁴⁶ 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 prevalence of rural living in Northern Ireland.

Research by NIRWN shows that rural women are under increasing pressure from the economic climate, causing them to experience more poverty and social isolation than ever before.⁴⁷ Rural women are particularly vulnerable to access poverty, making it harder for them to

⁴⁶ Mid-Year Population Estimates – Urban/Rural Change, NISRA

<https://www.daera-ni.gov.uk/publications/mid-year-estimates-population-change>

⁴⁷ Rural Women's Manifesto, NIRWN, September 2015

<https://www.nirwn.org/wp-content/uploads/2016/12/NIRWN-Rural-Womens-Manifesto.pdf>

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.

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.⁴⁸ 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.

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.⁴⁹ 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 divisions⁵⁰ 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.

⁴⁸ <https://www.nihe.gov.uk/Community/rural-issues/Improving-properties-in-rural-areas>

⁴⁹ Reaching Rural, Rural Strategy 2021-2025, NI Housing Executive
[Reaching Rural - Rural Strategy 2021-2025 \(nihe.gov.uk\)](https://www.nihe.gov.uk/Community/rural-issues/Reaching-Rural-Rural-Strategy-2021-2025)

⁵⁰ 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>

Networking, collaboration and genuine partnership within and between organisations and different sectors are vital to support rural communities. Multi-agency approaches such as Tackling Rural Poverty & Social Isolation (TRIPSI) have been very effective in the past and are an excellent example of collaborative working between government departments, statutory agencies, local government and rural communities. The Affordable Warmth Scheme is an excellent example of how multi agency approaches are a more effective delivery mechanism. 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. 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.⁵¹ 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

⁵¹ NI Housing Executive (2021) Reaching Rural, Rural Strategy 2021-2025. Available at: [https://nihe.gov.uk/Documents/Community/Rural-Strategy-2021-2025.aspx?ext=.](https://nihe.gov.uk/Documents/Community/Rural-Strategy-2021-2025.aspx?ext=)

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

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

1. A feminist approach to sustainability

As mentioned previously, the Strategy gives a clear commitment to promoting sustainability in the housing sector yet fails to recognise the gendered nature of the climate crisis and the opportunities for addressing the crisis in a feminist way, including those presented by this Strategy. The following paragraphs have been taken from the Women's Regional Consortium response:

“The Women's Budget Group (WBG) highlights that the narrow definition of green jobs as those in construction and technology can obscure the fact that the care industry is already a low carbon and high recompense sector.

WBG research⁵² found that a 2% GDP investment in care (for example, social care, childcare, parental leave and care leave) creates double the number of jobs for women and almost as many for men than the same investment in construction. Investment in free, universal childcare especially returns almost all of its initial investment. Eurostat data suggests that the care industry is 30% less polluting (in terms of

⁵² Investing in the Care Economy: A gender analysis of employment stimulus in seven OECD countries, International Trade Union Confederation, March 2016 Investing in the Care Economy - International Trade Union Confederation (ituc-csi.org)

Greenhouse Gas emissions) than the construction industry and that the education industry is 62% less polluting than the construction industry.⁵³ This makes investment in this type of social infrastructure economically, environmentally and equality sound.”

The WPG encourages the Department to gender-proof all sustainability planning to ensure that women are given equal opportunity to participate and benefit from any new job creation schemes relating to the development of sustainable housing supply.

2. Challenging conceptions of ‘economic inactivity’

Annex A of the Housing Supply Strategy provides a breakdown of ‘Key Trends Impacting the Housing Market.’ This includes data on rates of ‘economic inactivity’ in Northern Ireland and the UK.

The WPG would like to challenge the perception of “economic inactivity”, as many women are left out of the labour market due to home and family commitments, gendered stereotypes and systemic barriers to the labour market. This is a large proportion of women that could access the labour market if adequate childcare provisions and social support were in place. This has been estimated of being equivalent to 56% of GDP for the UK, with unpaid childcare alone being equivalent to 18% of GDP and long-term care being equivalent to 3% of GDP.⁵⁴

The economic inactivity of young women with dependents particularly, should be seen as a priority, as this is the least likely reason for men to become economically inactive and is a strong indicator of the levels of gender inequality that exist in Northern Ireland. The WPG would like to endorse the following statement from the Gender Equality Strategy Expert Advisory Panel Report (2021) in relation to this issue:

“The contributions of those in managing home and family commitments should not be considered to have no economic value; the COVID-19 pandemic exposed the essential nature of care work, and this should be valued. It is crucial to recognise the

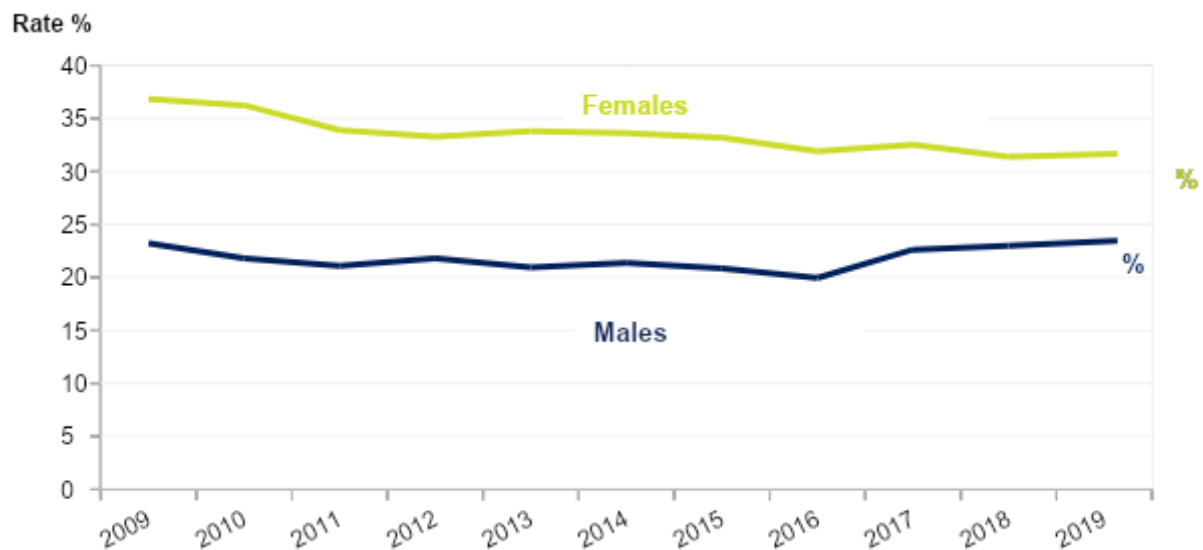
⁵³ WBG calculations from Eurostat data. Available at: <https://ec.europa.eu/eurostat/data/database>

⁵⁴ ONS (2016). Changes in the value and division of unpaid care work in the UK: 2000 to 2015. <https://bit.ly/3iWAXv0>,

economic value of unpaid work and challenge terms such as “economic inactivity” as they perpetuate the undervaluing of women’s domestic work. This has been estimated of being equivalent to 56% of GDP for the UK, with unpaid childcare alone being equivalent to 18% of GDP and long-term care being equivalent to 3% of GDP...⁵⁵

Finally, when looking at the causes of “economic inactivity”, it is crucial that an intersectional lens is applied to understand the reasons for this. For instance, there are also many issues with the treatment of and discrimination towards gender minorities in the workplace and in public-facing roles, coupled with broader issues in access to mental health support, housing and education, that needs to be examined to ensure that gender minorities are not forced into being what is considered “economically inactive”. In addition, inaccessibility and discrimination are huge barriers for disabled people accessing employment, and many become involuntarily “economically inactive” due to these societal barriers.⁵⁶

Figure 1: Northern Ireland Economic Inactivity Rate by Gender



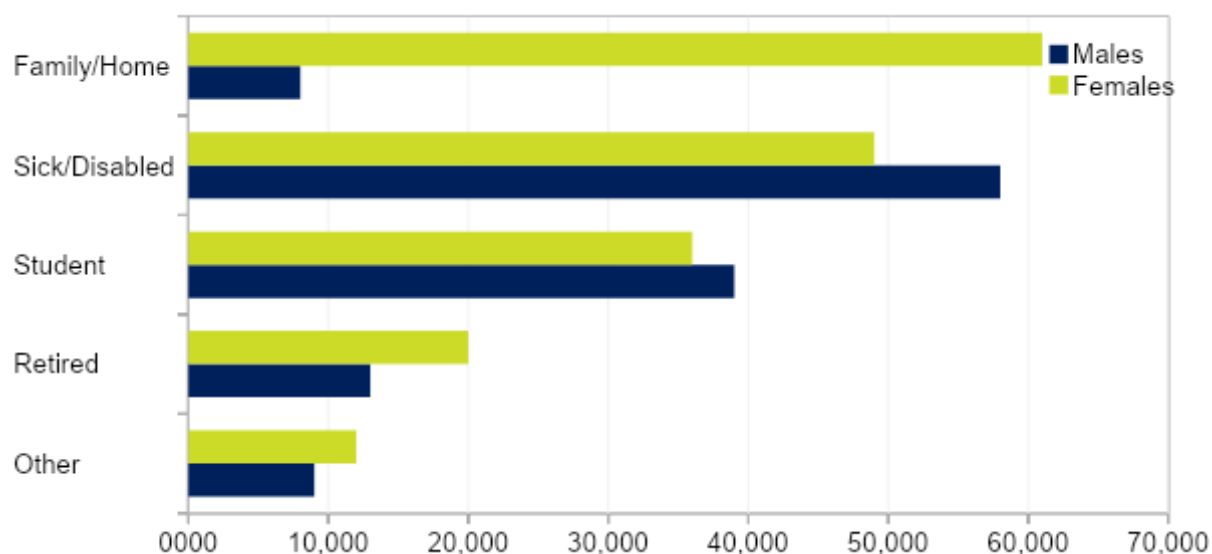
⁵⁵ ONS (2016). Changes in the value and division of unpaid care work in the UK: 2000 to 2015. <https://bit.ly/3iWAXv0>,

⁵⁶ Gender Equality Strategy Expert Advisory Panel Report (March 2021): <https://bit.ly/3zSb1JJ>

Source: NISRA - Women in Northern Ireland 2020⁵⁷

Roughly 30% of all women aged 16-64 are considered 'economically inactive' compared to 22% of men (figure 25 above); 34% (61,000 people) of these women are considered inactive due to family and home commitments. Conversely, looking after family and the home is the least common reason for male economic inactivity (8,000 people or 6%). The difference in inactivity rates between men and women can be entirely attributed to the difference in the number looking after the family/home. In fact, excluding the numbers looking after the family/home from the inactivity totals would bring the women's inactivity rate below that of males (19.9% for women and 20.7% for men).⁵⁸

Figure 2: Reasons for Economic Inactivity by Gender (16-64):



Source: NISRA - Women in Northern Ireland 2020⁵⁹

⁵⁷ NISRA (2020) 'Women in Northern Ireland' Available at: https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/Women%20in%20NI%202020_0.pdf

⁵⁸ Ibid. (n56).

⁵⁹ Ibid. (n57).

What is clear, and what women have always known, is that engagement and experiences with the labour market are largely gendered in Northern Ireland. Women have vastly different levels of uptake in employment, types of employment undertaken and sectors they work in, due to their age and whether they have young children. The inherently gendered nature of ability to engage with the labour market is not reflected as clearly on men as it is on women. The vertical and horizontal segregation of women in Northern Ireland is extremely prevalent, with societal attitudes to gender and caring responsibilities embedding this further.

Moving away from using the term 'economic inactivity' would give recognition to the fact that women are often excluded from the labour market as a result of unavoidable care responsibilities. It would also give recognition to the fact that care work is a valuable economic activity that is equivalent to 3% of national GDP.⁶⁰

7. Additional Comments

The WPG supports the 'whole system' approach taken by the Department in the draft Housing Supply Strategy. However, the WPG would stress that this commitment must be backed up by continued meaningful engagement over the course of the Strategy with the various sectors that are experts in issues relating to housing supply.

Given the importance of addressing housing supply issues in Northern Ireland, the WPG agrees with Housing Rights NI that a standalone housing outcome should be included in the next Programme for Government (PfG) and that the Strategy should be adopted at an Executive level. This would put a direct responsibility on The Executive Office (TEO) to deliver on the commitments made in the Housing Supply Strategy. It would also ensure that commitments made in the Strategy are honoured through the appropriate allocation of resources.

⁶⁰ ONS (2016). Changes in the value and division of unpaid care work in the UK: 2000 to 2015. <https://bit.ly/3iWAXv0>,

ENDS

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