

RETHINKING SOCIAL HOUSING NORTHERN IRELAND

Summary report













About CIH

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple - to provide housing professionals and their organisations with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world.

Further information is available at: www.cih.org

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- Everyone who attended a Rethinking social housing NI workshop or roundtable or completed the online survey.









Foreword

It is encouraging that providing secure and affordable homes continues to be a relatively high priority in Northern Ireland. There seems to be a strong public belief that this is a central policy, key to building a successful society. As a result, our Programme for Government document talks of aiming to close the gap between the number of homes we have and the number we need.

However, our strategic approach to social housing has not changed for some time. We are facing record levels of housing stress. Our society continues to see major changes, while the public spending environment remains extremely tough, with many calls on resources. All this presents significant challenges for the housing sector.

So it is really important that we now pause and ask ourselves fundamental questions about social housing, and what it should look like as we go forward. In many ways, the future of social housing is a conversation about what kind of society we want to live in, and how we make that fair, open and dynamic. We need to be very strategic, just as much as we need to be focused on practical solutions.

What is the value of social housing to Northern Ireland? Is social housing reaching its full potential? Who is social housing for?

Rethinking social housing Northern Ireland was launched to consider questions like these. Our approach focused on new research, with an aim of helping to shape the future of social housing. And we also were determined that the people who live in it, work in it and are connected with it are to be central to this dialogue.

Over 230 people participated in our research through workshops, roundtable discussions and an online poll, 35 per cent of whom were tenants or residents. This report combines the results of what they told us, along with our desk review of the evidence.

Overall, in this debate, we were constantly told about the value of social housing. We were reminded of the major role it plays in improving public health, reducing poverty and building a strong economy. Social housing is central to achieving so many people's main aspirations. However, we were also challenged by the areas where change is required. This report offers an ambitious series of recommendations to help ensure that social housing is fit for the future, taking account of what we heard from our research participants.

The recommendations include roles not just for central and local government, but also for the housing sector, including the Chartered Institute of Housing. Everybody needs to recognise that they have to be part of the change.

We hope that this report will continue to facilitate dialogue going forward, where areas of agreement are found and plans for change are developed. We all hope for the restoration of an Executive government but to maintain the momentum in the meantime we suggest the housing sector takes the conversation forward.

So we are at the beginning of a process. We need to develop further the thinking and provide robust challenge around the report's recommendations.

Rethinking social housing Northern Ireland could not have happened without the support of many people. Thank you to our sponsors, steering group members, participants in the research and everyone who helped out this year.

We hope you find this report useful and challenging. Above all we hope it plays a role in ensuring that social housing continues to be relevant and responsive to people's housing requirements well into the future.



Will Haire CB, chair of the Rethinking social housing Northern Ireland steering group





Contents

1. Why rethink social housing? How did we do it?	6
2. What does the project show?	8
3. Where do we go from here?	17







1. Why rethink social housing? How did we do it?

Northern Ireland remains a traditional housing market that primarily features social, private rented and owner-occupied housing. Broadly speaking, the way social housing is approached in the strategic policy setting has not changed significantly over the past 15 years.

However, there have been major changes in the financial and public environment, which has changed the position of social housing. In particular, there have been changes to social security policy, which is inextricably linked to housing policy, both in Northern Ireland and also in Great Britain. The latter has also experienced broader change in relation to housing, as well as the tragedy at Grenfell tower which has amplified the public dialogue surrounding social housing. This change context and dialogue has arguably elevated social housing in the public mind.

In Northern Ireland, the relationship of social housing to community segregation has been an issue of long-term concern and this issue continues to play an important and distinct role in Northern Ireland policy.

In this environment, Northern Ireland works to a new Programme for Government (PfG) that recognises the necessity to close the gap between housing need and supply. Its focus on outcomes is also highly relevant since housing clearly has a significant role to play in a wide range of social outcomes, such as addressing poverty and improving health and educational outcomes.

The Chartered Institute of Housing (CIH) believes it is therefore timely to consider the role and purpose of social housing in today's society, to help inform thinking around the future direction of housing policy. This led CIH to launching the *Rethinking social housing Northern Ireland* project.

The project was launched in order to:

- stimulate a wide-ranging debate about the future of social housing
- understand and challenge perceptions of social housing
- influence and shape the direction of future housing policy.

It considers some fundamental questions surrounding social housing through an evidence review and new research, and it makes recommendations for change. The new research involved asking stakeholders for their views on social housing through workshops, roundtable discussions and an online poll.

The people who participated in the research were tenants and residents; homeless service users; politicians; housing professionals; and associated professionals such as health and social care professionals, people working in homelessness, planners, architects and economists.

It is hoped to use this resulting document to engender a wide dialogue over the coming months. This report will be of particular interest to:

- The housing sector. Rethinking social housing Northern Ireland represents an opportunity for housing providers to consider how their work is relevant and responsive to people's housing requirements. And while the restoration of an Executive government is hoped for, the housing sector is well placed to take policy conversations forward in the meantime.
- Government departments. The findings represent an opportunity to consider how the potential of social housing can be maximised to provide housing solutions. To this end it will concern multiple government departments, with the outcomes-based approach of the PfG underpinning cooperation between the departments for communities, health and infrastructure to deliver social housing.
- Political parties. The report offers an evidence base on the current role and purpose of social housing and explores collective experiences and views about its future, which will be of interest to political key decision makers.

The evidence from this project shows that:

- Social housing has played a significant role to date in a wide range of social outcomes, such as addressing poverty and improving health and economic outcomes
- The security that social housing offers, the affordability of social housing and its quality are highly valued
- However, more 'sustainable, mixed' communities are aspired to, and there are acute disparities in how different types of need are prioritised for allocation to social housing.

The evidence gathered presents social housing in positive terms and CIH believes social housing must be championed as an essential service to society. It has an important part to play in providing people with homes, building and maintaining healthy communities, and meeting needs and aspirations that the market does not.



However, there are areas where change is required. This report offers recommendations for change that we believe are needed to ensure social housing acts as a dynamic part of the 21st century housing system. The recommendations include roles for both government and the housing sector including CIH - it is vital that the sector demonstrates leadership and offers solutions, which is made even more important by the absence of an Executive government.

We hope that this report encourages people with any kind of interest in social housing to ask fundamental questions about the way things are done. And we hope it plays a part in ensuring that more people have a house that is right for their circumstances - a place that they can call home.







2. What does the project show?

Given the changing environment, it is useful to pause and ask fundamental questions about social housing. In many ways, the future of social housing is a conversation about what kind of society we want to live in.

In carrying out both the evidence review and the research, three key groups of questions were posed:

- What is social housing? What should it be?
- What does social housing do? What should it do?
- Who is social housing for? Who should it be for?

These questions were designed to explore where we are now - mainly through the evidence review - but also where social housing should go from here, and this is where research that gathered and analysed stakeholders' views was important.

A total of 231 people participated in the research, 35 per cent of whom were tenants or residents. Roundtable discussions and workshops with tenants were conducted in partnership with Supporting Communities and the Housing Executive - we wanted to ensure that tenants' voices were heard as part of Rethinking social housing Northern Ireland.

This section explores the findings of this work.

2.1 What is social housing? What should it be?

Need, quality and cost

Social housing can be defined as a function of three factors: eligibility, quality and cost. ¹ Considering these three factors in the Northern Ireland context has implications for eligibility. Eligibility for social housing is governed by the Housing Selection Scheme Rules, which observes the principle of 'universal access' – almost all Northern Ireland adults are able to apply for social housing regardless of their circumstances.

At the same time the rules give allocation priority to people in most need. So in the context of the supply and demand mismatch of social housing and despite universal access, the vast majority of people allocated a social home are those in most need. The implication is that social housing in Northern Ireland is ultimately for people who need it, rather than people who are eligible for it.

This is reflected in the Housing Executive's definition of social housing, which is rented housing that is provided by social landlords (i.e. the Housing Executive and housing associations) who aim to provide good quality, affordable housing (cost) to people in housing need (eligibility).

Social housing in Northern Ireland is also very much defined by historical circumstances and contexts. The Northern Ireland housing story over the 20th century could be thought of as having five key experiences:

- direct and indirect state provision and support in social housing provision
- the role of social housing in raising house conditions through improvement programmes, new supply and slum clearance
- a focus on rents that are affordable as well as the relationship between rent levels and size/quality of the home
- the use of social housing structures and supporting policies to ensure fairness and equality in housing provision
- a move from housing the working classes to housing the non-working poor in general needs accommodation.

These points offer context to what social housing does and who it is for today, which is discussed later.

What people told us

When we asked people for their views on what they thought social housing was - or should be - the top themes were:

- Housing that is about meeting need, which was mentioned in 73 per cent of responses
- Affordable or low-cost housing was raised by 69 per cent of participants
- Good quality housing, including high standards and well-maintained homes, came up in 54 per cent of responses.

Meeting need

There was a strong sense that people believe social housing should fundamentally be housing that meets a need. However, there was no strong and consistent view about the definition of need - it is clear that need means different things to different people.

Needs arising from social issues and physical house conditions were variously supported. Some people observed how social housing has increasingly met complex and multiple needs over the years, rather than need more broadly - housing supply was raised as both a contributing factor to this and the reason why social housing must now focus on meeting need.





Meanwhile, others mentioned the ideal of including broader groups, while noting supply as a barrier. In relation to access, a number of people raised arguments that there is insufficient priority for financial need, such as people who are paying expensive market rents.

Affordable

There can be a lack of consensus surrounding the definition of affordability. While people did not explore the definition of affordability, several responses highlight the relationship between affordability and/or rent levels and:

- state assistance (capital subsidies, social security/ welfare reform)
- the not-for-profit status of social landlords
- community stability, particularly in rural areas.

Good quality

Many people discussed what good quality means to them, such as well designed homes and communities. Differences in appearance between social and private housing was raised as contributing to a 'stigma' surrounding social housing.

What people said

"Social housing is not a commodity. It is designed to meet a particular need - not just for sake of it - with a mixture of diverse people i.e. disability, mental health and addiction." - Homelessness worker (voluntary sector), Derry/Londonderry

"Social housing is principled and innovative - a good quality, market leading sector showing the way and informing the debate about housing design." - Architect, Belfast

"Affordability of social housing and the not-for-profit status of its providers are important. Social housing is housing that is provided without the profit motive." - Political representative

"Rural areas feature a low wage, fluctuating economy. Some people get bouts of work, some are seasonal workers, and some are self-employed with varying levels of income, which erects barriers to these groups accessing housing as a market and sustaining a home. Social housing is a secure and affordable option to address the housing need of these groups."

- Tenant/resident, Cookstown

"Social housing is provided with state assistance - there is some level of government subsidy. It is housing provided at an affordable level."

- Housing professional, Belfast

2.2 What does social housing do? What should it do?

Social housing reduces poverty by leaving tenants with more disposable income

Poverty and low incomes act as barriers to people accessing and sustaining affordable housing options. The 2013 Joseph Rowntree Foundation (JRF) study The links between housing and poverty highlights that "housing can mitigate or exacerbate the impact of poverty on people's lives". It found that good quality low cost housing can break the link between poor housing conditions and poverty in the UK. In one example, the 2016 JRF report Tackling poverty through housing and planning policy in city regions shows Northern Ireland housing costs cause poverty levels to increase by just one per cent - this compares with 11 per cent in London.

The Northern Ireland House Condition Survey 2016 finds that just ten per cent of social housing stock features fuel poverty - where a household has to spend more than ten per cent of its income on fuel use to maintain an acceptable temperature level - compared with 23 per cent owner-occupied and 26 per cent private rented/other. This reflects "in part the much newer stock managed by housing associations" as well as "the investment in energy efficiency measures in Housing Executive accommodation over the decade 2006 to 2016" according to the survey. It also reflects the fact that private dwellings are most likely to have oil central heating.





Social housing with support services improves the lives of people with specialist and complex needs, and enables them to live independently

Accommodation based services, such as those funded by Supporting People (SP), enable people to live independently². There is continuing dominance of community-care related expenditure in SP including in relation to mental health; physical, sensory and learning disabilities; and older people³.

Housing First service users have reported better health and social networks, while there is a reduction in levels of alcohol use and in the use of PSNI and emergency services. For every £1 invested in the Housing First service there is a social value of £15 returned, and a majority of service users maintain their tenancies⁴.

There are also notable improvements in the lives of people resettled from long stay hospitals to supported housing schemes⁵.

Social housing contributes to wider government objectives and saves money in other areas of public spending such as health

NICVA estimates that every £1 spent on Supporting People - which provides some of the services highlighted above - saves the public purse £1.90.

Regarding health, the 2012 BRE report *The cost of poor housing in Northern Ireland* estimated that reducing category one hazards (as measured by the Housing Health and Safety Rating System) in Northern Ireland's housing stock would save the NHS £33 million per annum and save society £82 million. BRE highlights a particular impact for older households – 24 per cent of the 75 years and older group live in homes with category one hazards compared with 18 per cent of all households. Older people are the most vulnerable with respect to falls associated with steps and stairs, falls on the level and excess cold.

While the BRE report is cross tenure, the 2016 Housing Condition Survey shows that 96 per cent of social housing has no hazards, compared with 92 per cent in private rented/other and 91 per cent of owner-occupied homes. So it can be said social housing makes a greater contribution to reducing pressure on the NHS through its higher quality accommodation.

Regarding jobs and the economy, it is estimated that £1.15 billion of economic output was supported by social housing in 2012/13; £460 million gross value added (GVA) was created for the Northern Ireland economy (1.4 per cent of total GVA); and 15,436 full-time equivalent (FTE) jobs were associated with Northern Ireland's social housing.

Social housing plays an important role in addressing homelessness

The Housing (Northern Ireland) Order 1988 places a duty on the Housing Executive to provide accommodation for certain groups who are homeless. The evaluation of Northern Ireland's homelessness strategy 2012-2017 states that "housing remains fundamental to delivering an end to homelessness. Ensuring that adequate, affordable housing with reasonable security of tenure is available is essential to delivering effective homelessness prevention and reducing the extent and duration of homelessness". 7

Susanne Fitzpatrick and Mark Stephens carried out an international comparative study in which homelessness and social housing experts across 11 countries were surveyed. They found that "the underlying 'structural' factor usually said to be driving homelessness is a shortage of affordable rented accommodation". 8

²RSM McCLURE WATTERS. (2015). Evaluation of accommodation based services funded by Supporting People (SP). Belfast: NIHE.

³ACHESON, N. (2016). Supporting People partnerships in Northern Ireland. In P. SHANKS, & D. MULLINS, *Housing in Northern Ireland, 1st ed.* (pp. 221-235). Coventry: CIH.

⁴BOYLE, F., & PALMER, J. (2016). The efficiency and effectiveness of the Housing First support service piloted by Depaul in Belfast, funded by Supporting People: an SROI evaluation. Belfast: NIHE.

⁵BOYLE, F., & PALMER, J. (2017). The hospital resettlement programme in Northern Ireland after the Bamford review. Belfast: NIHE.

⁶FODEN, M., GREEN, S., ROBINSON, D., SANDERSON, E., & WILSON, I. (2015). The economic impact of social housing organisations in Northern Ireland. Belfast: NIHE.

⁷BOYLE, F., & PLEACE, N. (2017). The homelessness strategy for Northern Ireland 2012-2017: an evaluation. Belfast: NIHE.

⁸FITZPATRICK, S., & STEPHENS, M. (2007). An international review of homelessness and social housing policy. London: DCLG.





Social housing allows engineering of religious mixing and contributes towards equality issues

Looking at housing in the context of conflict in Northern Ireland, Brendan Murtagh says that "housing-led regeneration is central to any progressive agenda on conflict management at both the local and macro-political levels".9

In relation to current housing policy facilitating religious mix, he goes on: "the Shared Community theme [of the Together Building a United Community (TBUC) strategy] resulted in a joint programme between the Department for Social Development (DSD), the Housing Executive and housing associations to create ten purpose-built mixed-religion neighbourhoods. ... the use of fiscal instruments, managing allocations within the constraints of the selection scheme and designing intensive community support arrangements represent a serious attempt to deliberately produce new mixed-religion neighbourhoods across Northern Ireland."

Social housing creates established communities including through security of tenure

The Housing (Northern Ireland) Order 1983 provides that social landlords are only permitted to end a tenancy on limited grounds. Around 60 per cent of Housing Executive tenants have been tenants of the organisation for more than 15 years, according to the landlord. Though in the case of supported housing, Nick Acheson observes that "residents' continuing occupancy is in practice subject to case management review and psychiatric assessment".¹⁰

Social housing allows eligible tenants to buy their rented home

Secure tenants of the Housing Executive and housing associations who have a minimum of five years' tenure have the right to buy their rented home at a discount. This is subject to certain exemptions, such as for certain property types. The discount ranges from 20 per cent, to the lower of 60 per cent or £24,000, depending on the length of tenancy. NIHE reports that the organisation has sold approximately 119,000 dwellings to sitting tenants since 1979.

What people told us

The top themes that people participating in the research considered central to the contribution of social housing were:

- Creates security and stability primarily in terms of a home for life, but also homes that are safe was raised in 74 per cent of responses
- Builds and maintains a community including through social and tenure mixing was mentioned by 63 per cent of participants
- Interacts with the private sector, such as stepping in to fill gaps in the market or enabling home ownership through the house sales scheme (right to buy), came up in half of the responses
- Enables independence and support was mentioned by 41 per cent.

Creates security and stability

The theme that featured most strongly for the whole research was that social housing provides stability and security for people, primarily by way of secure tenancies. Secure tenancies were seen as central to maintaining communities – people generally did not support the concept of social housing as a 'transitional' tenure due to the adverse impact it would have on sustainable communities, as well as people who are vulnerable and older people.

The security of tenure that social housing offers as expressly distinct from the private rented sector was a common theme. There was a recurring view that private rented housing should offer greater security of tenure.

Some people considered security of tenure as an important factor in creating a sense of 'home' and 'ownership', and security as a foundation upon which tenants were able to build their lives was a concept that was explored by many.

A small number of people explored 'conditionality' around security of tenure, such as probationary periods, means-testing, the way changes of circumstances should be treated, and helping tenants to increase economic activity as an incentive for home ownership.

⁹MURTAGH, B. (2016). Segregation, territory and housing policy. In P. SHANKS, & D. MULLINS, *Housing in Northern Ireland*, 1st ed. (pp. 165-177). Coventry: CIH.

¹⁰ACHESON, N. (2016). Supporting People partnerships in Northern Ireland. In P. SHANKS, & D. MULLINS, Housing in Northern Ireland, 1st ed. (pp. 221-235). Coventry: CIH.





Builds and maintains a community

Almost two thirds of responses mentioned that social housing creates communities. There was a good amount of commentary around what those communities should look like. 'Sustainable, mixed' communities that feature income, social and religious mixing were seen as desirable.

There was a strong sense that winding back the residualisation of social housing was a common aspiration, as well as addressing the spatial separation of different groups in housing. People generally want to see higher levels of community cohesion with diverse groups living together, such as working and non-working households, lone parent and couple parent families, and people from different community backgrounds. Mixed-tenure, mixed use developments and developer contributions were seen as ways of achieving this. However there was also acknowledgement that mixing – both in social and religious terms – can be difficult to achieve and must be done correctly.

When exploring the reasons for residualisation and segregation, people pointed variously to the lower levels of supply than were achieved historically, the allocations system and the Troubles.

Maintaining communities through different types of housing, suitable services/amenities, community development and regeneration were recurrent themes. Tenant participation was seen as important to the role of social housing in creating communities. Some people also raised the potential impact of welfare reform on community sustainability.

Interacts with the private sector

Often in the interviews people defined the nature and value of social housing as 'what the private sector might not have'. There was also a sense that the interaction between sectors was much more fundamental. People observed that social housing provides homes that 'otherwise wouldn't be available', for those who 'can't afford or access private renting/buying'.

Others suggested that the housing market as a whole cannot function properly in the absence of social housing, or that social housing must take stock of what is happening in the wider market, demonstrating interdependency. That social housing should be a tenure of choice in the housing system, rather than one of last resort, was also raised.

There was commentary around the house sales scheme (right to buy) as the tool enabling access to home ownership through social housing. Opinion was very much split on the scheme, although it was generally recognised that it isn't a black and white issue. Different stances included:

- Fundamental opposition to the policy because social homes are lost and not replaced, particularly at a time when demand for social housing continues to outstrip supply
- Support for the policy continuing but with changes, such as funds raised from house sales to be reinvested only in new stock, or certain property types to be exempted
- Suspending the policy for as long as the social housing supply and demand mismatch continues.

Enables independence and support

Forty one per cent of people considered that social housing is distinguished by facilitating independent living (particularly but not exclusively for older people and people with specialist and complex needs) through support services, which are provided with or in addition to the physical accommodation. Independent living was mentioned by some as being linked to social inclusion, integration into communities and wider community resilience.

The need for adequate funding to sustain supported living schemes was raised - particularly in the context of the ageing population and rising numbers of people with complex needs, as well as the need for more support that is suitable.





What people said

"Social housing is about soul not soil. It's about creating communities not just houses." - Private tenant, Co. Antrim

"A 'house' could be temporary, but social housing should offer somewhere you feel is home. The things that make a house into a home are contents, security, pride and a sense of ownership, if not literal ownership. That's a home. When you rent from a private landlord he or she can come along and say I want you out in a month's time. But having your own social home - you've got rights and it's seen as home for life." - Homeless service user, Belfast

"I think social housing can engender more sense of community than private developments, especially where mixed tenant types live together. Therefore social housing should not just be about bricks and mortar but about building communities where people can support each other and enjoy good community infrastructure." - Health and social care professional, Co. Antrim

"There needs to be balanced communities
- a mix of tenures, sizes of units, workers and
non-workers, ages. The design of social housing
including layouts needs more emphasis, rather
than just quantum of social housing. We do
need to define and meet the 'need' - but to do
it better and more sustainably for the long-term,
not with big estates of social housing."
- Housing professional, Derry/Londonderry

"Fundamentally social housing is a community and the community is there to support you. It also facilitates tenant involvement, offering tenants a voice. There is more to do on the road to developing tenant involvement, from scrutiny panels to mutuals and co-operatives as good participative structures. But there is also fear on the road - the concept that tenants would be in charge in future is perhaps perceived to be frightening for some."

- Tenant/resident, Ballymena

"It's about having a healthy mix of housing tenures and trying to integrate communities. It's very stark that we have shared neighbourhoods in middle class and affluent areas, while apart from a few exceptions social housing remains segregated." - MLA

"Social housing should be a dynamic part of the housing system, stepping in where the market has failed and changing depending on what is happening in other tenures - much of the housing system is driven by what's happening in the owner occupation market."

- Political representative

"Social housing facilitates intensive support tailored around an individual. The most vulnerable in society are supported - leaving care, prison, hospital, residential care home etc. Housing professionals are trained to a high standard including for inter-agency working to promote safety and continuous support."

- Housing professional, Dungannon

13





2.3 Who is social housing for? Who should it be for?

Social housing is for everyone

To apply for social housing, people generally need only be aged 18 or over (there are exceptions for 16 or over) and have a substantial connection with Northern Ireland. The universal declaration of human rights article 25 states that "everyone has the right to a standard of living for the health and wellbeing of himself and his family including....housing". Whether a rights-based approach to housing delivers what we expect it to in practice, and whether 'programmatic' citizenship rights and positive legal rights are effective in tackling homelessness are often subjects of debate.¹¹

Social housing is for people in need

In relation to rationing a limited resource, social housing is for people in most need

The Northern Ireland Housing Statistics show there were 37,611 households on the waiting list in 2016-17 against 7,672 allocations. The Housing Selection Scheme Rules give allocation priority to those in need, so in the context of the supply and demand mismatch social housing allocations are made to those in most need. The Rules define the different categories of need as cases of: intimidation; homelessness; sharing; dependent children; overcrowding; lack of amenities and disrepair; time in housing need; and poor health and social wellbeing.

Tension has been observed between needs-based allocations, and criteria based on suitability and choice. Needs-based allocations lead to residualisation and unpopularity of social housing, and it means that risk management is a recurrent theme of housing management practice.¹²

Social housing is for people who are homeless

The Housing (Northern Ireland) Order 1988 states that if the Housing Executive is satisfied that eligible homeless applicants have 'priority need' and have not become homeless intentionally, it has a duty to offer them accommodation (and offer temporary accommodation beforehand) as 'full duty applicants' (FDA). As a group in need, households who are homeless are afforded a high priority under the Housing Selection Scheme Rules (70 points).

The Northern Ireland Housing Statistics show that 11,889 households presenting as homeless in 2016-17 were accepted as FDAs. Of those households, 1,842 were discharged. Discharging primarily involves re-housing the applicant in the social sector. It is not a requirement for the Housing Executive to discharge applicants using only social housing, but to date it has been its custom and practice to do so (although this is currently under review). Therefore 1,842 discharged households are at least in part comparable against the 7,672 overall allocations to social housing mentioned above.

Social housing is for people with specialist needs including mental health needs, learning disabilities and dementia

Supported housing with care and dementia friendly schemes operate outside the Housing Selection Scheme and is normally accessed though social services. Nick Acheson gives an example of one scheme with a Supporting People provider and housing association partner where "control over who lives in the scheme remains entirely with the Health and Social Care Trust". 13

He goes on: "Places are only available to people who have previously been long-stay hospital patients and they are identified through a care planning and care management process that is professionally and administratively led by the trust. Only after they are selected are they then placed on the housing waiting list so they can qualify."

Social housing is for older people

The most common age group living in social housing is 60 and over. The House Condition Survey 2016 shows household reference persons aged 60 and over constitute 38 per cent of social housing, while 24 per cent are aged between 25 and 39. Data submitted to us by NIFHA shows that 39 per cent of allocations to housing association homes went to people aged between 25 and 44 over the five years to 2016/17, with 28 per cent to people aged 60 plus. This paints a partial picture of younger people now joining an overall tenant profile that is older.

These profiles may change over time given the ageing population - NISRA 2016-2041 population projections estimate "a 65.1 per cent increase in the number of people aged 65 and over, rising from 297,800 people to 491,700".

¹¹FITZPATRICK, S., & WATTS, B. (2010). The 'right to housing' for homeless people. In E. O'SULLIVAN, V. BUSCH-GEERTSEMA, D. QUILGARS, & N. PLEACE, *Homelessness research in Europe* (pp. 105-122). Brussels: FEANTSA.

¹²COWAN, D., & MARSH, A. (2006). From need to choice, welfarism to advanced liberalism? Problematics of social housing allocation. *Legal Studies*, 25(1), pp. 22-48.

¹³ACHESON, N. (2016). Supporting People partnerships in Northern Ireland. In P. SHANKS, & D. MULLINS, *Housing in Northern Ireland,* 1st ed. (pp. 221-235). Coventry: CIH.





Increasingly older people are being allocated social housing as homelessness applicants. In its homelessness strategy, the Housing Executive states that "while overall [homelessness] presentations have dropped, acceptances have increased. An ageing population coupled with increasing numbers of clients with complex needs such as mental health problems, addictions etc. means that more households are meeting the 'priority need' test than previously".

Social housing is for people on lower incomes

A high proportion of people living in social housing are reliant on welfare benefits. The 2016 House Condition Survey shows that 75 per cent of household reference persons in social housing were unemployed or economically inactive. The remaining proportion was working full-time or part-time. Similarly, the Housing Executive's Continuous Tenant Omnibus Survey 2016 revealed 79 per cent of its tenants were unemployed or economically inactive.

What people told us

Almost three quarters (73 per cent) of people suggested that 'meeting need' is a central theme of social housing, as outlined in 2.1. This percentage also includes statements expressing that social housing should ultimately be 'for people in need' or 'for people who need it':

- Social housing should meet a need or be for people in need - as above, this theme featured in 73 per cent of responses
- **Everyone** 53 per cent of participants said that social housing is or should be 'for everyone'
- People who are vulnerable, including people with additional, special or complex needs, featured in 34 per cent of the responses
- 30 per cent of people referred to the **housing** selection scheme and 'points' to determine priority, almost exclusively in a negative light
- 30 per cent of people also raised the **stigma and perceptions** surrounding social housing
- People who are homeless was mentioned by 29 per cent
- People with a low income came up in almost a quarter (24 per cent) of responses

For people in need vs. for everyone

As demonstrated above there is a fundamental tension evident in the research - almost three quarters of participants said social housing is for 'need' while just over half said it is for everyone. The 'need' theme has been discussed in section 2.1.

In some circumstances it was clear or implied that the 'everyone' comment referred to universal access, with people expressing a view that allocations should still be made on the basis of need. For other participants it was clear they want to see a broader mix of tenants living in social housing. In some cases it was stated or implied that this broader mix would still be facilitated by needs-led allocations, but using a concept of need that is broader than that currently reflected in the housing selection scheme. This broader concept of need included a much higher priority being given for financial need, or the need for an affordable home. Others said they would like to see more people housed who are economically active.

'Points' and the housing selection scheme

One third of participants referred to the role of the housing selection scheme and 'points' in determining priority, almost exclusively in a negative light. People generally want to see an allocations system that:

- is more transparent
- better reflects applicants' needs, including financial need and the needs of care leavers
- has fewer perverse incentives and less ability to be 'abused' and 'played'
- contributes more towards community sustainability and less towards the residualisation and stigmatisation of social housing.

Stigma and perceptions

It should be observed that research participants generally spoke about social housing in positive terms and the value of social housing was acknowledged. Nevertheless some people see social housing as having a 'stigma'. This primarily relates to the image of social housing created by residualisation.

However a broader theme which can be summarised collectively as 'perceptions' was discussed during the research. The perceptions theme was raised by 30 per cent of participants and covers issues such as the name of social housing, eligibility and politicisation of the tenure, as well as the stigma due to design differences. Some people suggested that more people should know about social housing, what it offers and the people who live in it to tackle negative perceptions, including through awareness raising activities.





What people said

"Social housing should be for everyone. At the same time social housing is a scarce resource even though it shouldn't be so it's for everyone who needs it. If someone can afford market housing, they shouldn't be excluded but you might give them less priority for an allocation. Economic activity should have higher priority than it currently does." - MLA

"Social housing is for those in need, but fundamentally everyone has the right to a home. Focus on future demographics - millennials will not be able to buy and there will be an increase in the percentage of over 65s in the future." - Architect, Belfast

"Priority should be given to those in need i.e. care leavers. Legislation needs to change to consider the specific needs of care leavers as they leave care when they are 18. There needs to be more work done to acknowledge young people leaving care and allowances made to identify suitable accommodation earlier. This will help transition them into accommodation and maintain it."

- Health and social care professional, Dungannon

"The current needs based model we have isn't good, because it stigmatises social housing. People are in desperate situations but they can't get near the top of the list. If people don't ask for points, they aren't awarded them. The points system lets people down and there is a lack of transparency here. The waiting list doesn't reflect need. Social housing should be available to a much wider group of people when you consider 'need'. For example, when you're younger housing can be less affordable."

- Political representative

"There is a stigma attached to the word 'social' in social housing. The word social is both a strength and a weakness. Social is that which society funds - on one hand it can be seen to meet the needs of society, but on the other it can be seen as a drain on resources. Perceptions will depend on people's experience and knowledge. But social housing serves society and that makes it a positive thing."

- Tenant/resident, Ballymena

"Social housing is for everyone - we need an awareness campaign to let people know it is a housing choice. It provides a variety of housing options and there should be greater awareness among the public." - Housing professional, Dungannon

"A series of articles in print media and perhaps on TV would be useful to explore some of the issues surrounding social housing, not the tabloid, sensationalist drivel that is frequently put forward." - Member of the public, Co. Londonderry





3. Where do we go from here?

Based on the project findings, CIH offers the following definition of the future role and purpose of social housing in Northern Ireland for government, the housing sector and related sectors to consider:

"Social housing is good quality, genuinely affordable rented housing provided by registered not-for-profit social landlords with capital subsidy, which is available to everyone. It acts as a dynamic part of the housing system while offering tenancy security, building and maintaining mixed communities and enabling people to live independently. It is allocated in a fair and transparent way with priority established according to a common definition and understanding of need."

Below we offer recommendations for change that we believe are required to ensure social housing fulfils the role and purpose outlined above. Some of the recommendations are solutions in themselves, while others represent the beginning of a process.

Particularly given the role for the housing sector in these recommendations, this dialogue could be facilitated through an independently chaired, sectorled working group to develop the thinking and provide challenge around the recommendations.

I. Supply

Social housing is good quality, genuinely affordable rented housing provided by registered not-for-profit social landlords with capital subsidy, which is available to everyone.

Fundamentally, in order for social housing to be available to more people, its provision needs to be subsidised, more of it needs to be built and more existing stock needs to be retained.

Nevertheless, even with a substantial increase in social housing supply, it will not be available for everyone on the waiting list. There is clearly a gap in the housing market for more rented housing options that are affordable for lower to middle income working households.

CIH recommends that central government:

- (a) commit to providing the investment in social housing required to reduce housing stress
- (b) explore a mid-market rent housing option
- (c) end the house sales scheme for social housing providers.

CIH recommends that the housing sector:

(d) work with government to explore a mid-market rent housing option.

Provide the social housing investment required to reduce housing stress

The commitment in the draft Programme for Government (PfG) was to build an ambitious 9,600 social homes over five years, an average of 1,920 per annum. The Outcomes Delivery Plan now reduces the target to 7,600 or 1,520 per annum, although the aspiration to build the original number remains. The lower target is more realistic, but falls short of the number of homes deemed required. It is important to provide investment at a level that delivers the number of social homes deemed required, and reduces housing stress as per the aim of the PfG.

Homes that are good quality with high environmental standards contribute towards reductions in fuel poverty levels and better health outcomes. So new social housing supply is also in the interest of multiple government departments, particularly in the context of the outcomes-based PfG. High grant rates for new social housing contribute towards housing associations being able to set their rents at more affordable levels.

Explore a mid market rent housing option

It is vital that additional routes to housing supply be considered. This includes innovative approaches and new 'products' to address unmet need in the housing market. Products such as mid-market rent (MMR) are particularly attractive and social landlords are well placed to deliver these. MMR is a housing option with rents that are lower than the private market but higher than in social housing. It usually targets people with low priority for social housing, but who cannot afford to buy or rent.

Typical tenants in MMR housing in Scotland for example - where there are minimum and maximum income thresholds for eligibility - have modest household earnings, and some rent for long periods. MMR has been funded with housing association grant from the Scottish Government, although over the last few years different approaches have emerged such





as investment and off balance sheet models. Going forward, this may signal more diversification of MMR finance away from grant-funding.

Nevertheless, there are limitations in relation to development viability if MMR is priced by local housing allowance. Further work is needed to determine the viability of MMR models for Northern Ireland's local markets.

End the house sales scheme

Supply also comes from existing stock. Participants in the research were very much divided on the future of the house sales scheme, as highlighted in section 2.2. Nevertheless, on the balance of the available evidence we believe the house sales scheme should end for all Housing Executive and housing association tenants in Northern Ireland. Ending the house sales scheme will contribute to significantly higher levels of social homes in the long term. We recognise that the current number of house sales is small by historical standards, but is likely to increase with a rising housing market.

It should be noted that recommendations I and II are interdependent in relation to pursuing mixed neighbourhoods. Ending the house sales scheme without an increase in developments with tenure mixing would result in higher overall rates of tenure segregation.

Home ownership remains an aspiration for many people, representing a complementary housing option which also addresses housing need and demand. It would be beneficial to explore alternative pathways to ownership in the absence of a statutory house sales scheme.

II. Mixing and stigma

Social housing acts as a dynamic part of the housing system while building and maintaining mixed communities.

Social housing and what it offers was valued by research participants. At the same time they do not want to see large, single-tenure social housing estates being built. Instead, mixed-tenure developments are valued as they are seen to support sustainable communities. They can also facilitate a mix of people from different community and income backgrounds.

We believe a 'whole system approach' to social housing is needed that also serves to tackle the stigma and false perceptions surrounding the tenure. It is important in our view that social housing works better with the private sector generally, particularly given the greater supply and demand mismatch of social housing while the private sector is experiencing steady growth. This is beginning to be reflected in

public policy, for example in relation to the current departmental proposal that the Housing Executive be able to discharge its homelessness duty using private rented housing.

CIH recommends that local government:

- (a) facilitate mixed-tenure schemes through the planning system
- (b) implement systems of planning obligations for social and affordable housing.

CIH recommends that central government:

- (c) introduce a central developer contributions policy for social and affordable housing
- (d) provide a level playing field between new social and private developments at community consultation stage.

CIH recommends that the housing sector:

- (e) develop more mixed-tenure schemes
- ensure that housing staff are equipped with skills and competencies relating to good housing and tenancy management
- (g) tackle stigma through a parity of tenure approach wherever possible
- (h) challenge negative perceptions through educating the public on the benefits of the regulated social housing sector.

CIH will:

- (i) work with the housing sector to ensure that staff are equipped with skills and competencies relating to good housing and tenancy management
- (j) engage with NI political parties to make the case for the value of social housing to society.

More mixed-tenure schemes

Throughout the research, people referred to mixedtenure developments as a tool to facilitate cohesive communities which particularly have social and economic diversity. A recent mixed-tenure thinkpiece published by NIFHA and DfC lists the potential social and economic benefits of mixed-tenure schemes:

- reducing 'place and tenure-based' stigma (a point which is explored further below)
- reduced levels of crime and anti-social behaviour
- improved sense of community and social cohesion
- better job prospects and improved school attainment
- improved physical and mental health of residents.

Mixed-tenure developments can also encourage integration across the different community backgrounds. Nevertheless, the high level of





community segregation in social housing is an issue of a considerable scale that will require ongoing, complementary policy approaches. It may be beneficial to review how public policies that promote community integration and cohesion in the housing context are working.

Meanwhile it is clear then that mixed-tenure developments have the potential to support a wide range of outcomes in the PfG and they therefore concern multiple government departments. They can also unlock opportunities for funding – which is important in a constrained budgetary environment – such as cross-subsidy and new funding methods like financial transactions capital.

Some housing associations have begun incorporating shared equity homes in developments and there is increasingly an aspiration to deliver mixed-tenure developments in earnest.

Introduce a system of developer contributions

We believe additional policy tools such as developer contributions are required to underpin the mixed-tenure agenda and ensure schemes are delivered to their full potential. Contributions were raised by some participants as a way of achieving diverse, cohesive neighbourhoods.

Northern Ireland remains the sole region across the UK and Ireland without a region-wide system of developer contributions for social and affordable housing. Contributions have shown elsewhere that they are a successful tool in achieving the aim of sustainable mixed-tenure communities. Part V of Ireland's Planning and Development Act 2000 as amended by subsequent legislation has contributed to increasing social integration and more sustainable mixed-tenure communities.

We acknowledge the work of local councils and departments to date in developing planning obligations and policies that support mixed-tenure schemes as a part of the local development plan process. We nevertheless believe a central developer contributions policy is also required to add a strong element of standardisation to local approaches.

The NI housing market can be described as being in good health, with steady growth and a strong forecast. In this context in particular it is worthwhile revisiting the developer contributions debate that has taken place in previous years.

Ensure that housing staff are equipped with skills and competencies required for good housing and tenancy management

Good quality housing management is vital to sustaining tenancies and communities. Conversely, poor housing management can contribute to stigma and negative perceptions. Local contexts are central to how housing management is carried out - when the nature of housing developments and communities change, housing management approaches including partnership working will vary in response. This has particular significance not just for mixed-tenure developments, but also for other housing developments that aim to achieve social and community mix, such as shared housing developments. The sector, including CIH, must ensure that housing professionals are skilled to:

- advocate, market and communicate mixed-tenure and shared housing developments
- promote acceptance among people from different backgrounds
- help residents feel safe and connected in their communities
- respond to sectarian intimidation and threats including display of inappropriate symbols and imagery.

Provide a level playing field between new social and private developments at community consultation stage and tackle stigma through parity of tenure wherever possible

Stigma is another issue that has been raised by the development industry as a barrier to mixed-tenure developments and a developer contributions system, due to a perception that the presence of social housing impacts on the sale prices of private homes in mixed-tenure developments.

However, the evidence is that mixed-tenure developments do not reduce property prices, provided the housing quality and the design of the development overall are of a high standard. Tenure blindness serves to remove unnecessary differences between social and private housing and move towards more of a 'parity of tenure' approach. Research participants raised differences in appearance between social and private housing as contributing to stigma.

A parity of tenure approach and tenure blindness has broader implications than in the context of mixed-tenure developments. It is common practice for some social landlords to 'brand' existing mono-tenure developments - this practice should be afforded careful consideration to ensure that it does not contribute towards the stigmatisation of social housing.





There are also implications for the manner in which new social housing developments are consulted upon. There is a unique requirement for housing associations to carry out community consultation for all developments - we would question the necessity of this requirement and suggest its removal in order to create more of a level playing field between social and private housing providers in this regard.

Challenge negative perceptions through education

Research participants raised the issue of a public perception that people, especially young people, were not eligible for social housing even though in all likelihood they are. This is problematic if the waiting list does not accurately reflect housing needs in areas that are deemed 'low demand' for social housing, particularly rural areas. This in turn means that new social housing is not built in these areas, which reinforces the cycle.

Adopting a common definition and understanding of housing need would contribute towards addressing this, which is discussed in recommendation III. However there is also merit in an awareness campaign from the housing sector and/or government to inform the public that social housing is a housing choice for everyone.

We also recommend that the housing sector and its partners undertake a campaign(s) to inform the wider public of the benefits of the regulated social housing sector. It is about the sector demonstrating thought and brand leadership, telling its story and setting the narrative on the benefits of professional housing management and the social and economic value that social housing contributes to society.

III. Eligibility and priority

Social housing is available to everyone. It is allocated in a fair and transparent way with priority established according to a common definition and understanding of need.

There was a strong sense in the research that people believed everyone should be eligible for social housing, while almost three quarters of people said that social housing should meet need or be for people in need. Many participants felt that greater priority should be given to people with certain needs, such as care leavers and people in financial need (for example, those paying expensive market rents or those who are ineligible for a mortgage or Co-Ownership Housing).

While the current points system is unpopular, we believe that many of the associated issues raised will be addressed by the Department for Communities' proposed changes to allocations policy. However there are acute disparities in how different types of need are determined by the selection scheme.

CIH recommends that central government:

(a) preserve universal access and adopt a common definition and understanding of need.

We recognise that the Department for Communities has:

- recently carried out a fundamental review of social housing allocations policy
- published commissioned research to inform the review, and
- consulted upon a series of recommendations for change, some of which must await an Executive for implementation.

CIH Northern Ireland is generally very supportive of the departmental recommendations. Furthermore many of them serve to address some of the issues that research participants raised. The proposals would:

- preserve universal access
- maintain needs-based allocations, while applicants with similar levels of need are allocated a home based on the time spent on the waiting list through a hybrid points-banded system - this could increase fairness and transparency, helping to address 'points chasing' and perceptions of 'queue jumping'
- abolish intimidation points, which many stakeholders consider a perverse incentive that is abused, for a fairer and more proportionate approach to addressing intimidation.

However one area that we recommend is explored further is the priority that the selection scheme affords for applicants' needs. For example, an applicant's current accommodation being too expensive is reflected in the housing selection scheme rules, but is addressed under 'other social needs points' and awards the applicant just ten points.

If this were an applicant's sole need, the departmental proposal on the hybrid points-banded system would classify him or her as having 'some need, but not in housing stress', which is the second from bottom band of the six band system. In practice the applicant would have no chance of an allocation in a high demand area, since there is no required quota of allocations from the lower bands in the proposed system.

This is not necessarily to suggest financial need should be considered a high level of need, but it serves to demonstrate how something that research participants consider is need is not afforded priority under the selection scheme rules.





There are acute disparities in how different types of need are determined by the selection scheme, which favours compounded, specifically defined needs rather than needs more broadly.

Nevertheless it is clear from the research that 'need' means different things to different people. And in our experience the selection scheme continues to be seen by many stakeholders as a fair and objective way to assess applicants' housing needs and determine priority for the allocation of a social home.

We therefore recommend that a common definition and understanding of need be developed, which would underpin the new selection scheme. We also recommend an equality impact assessment be undertaken to identify possible adverse impacts on disadvantaged and vulnerable people of a common definition of housing need.

IV. Security and independence

Social housing acts as a dynamic part of the housing system while offering tenancy security and enabling people to live independently.

We support secure tenancies and their function as a suitable approach that plays a vital role in maintaining communities, enabling tenants to enjoy a sense of place without fear of unreasonable tenancy termination and the stress that this can induce.

At the same time, security of tenure does not have to mean remaining in the same property indefinitely – social housing providers require flexibility in pursuit of tenancy sustainment and good stock management, particularly in the context of welfare reform. We therefore support the principle of 'security of tenancy' to reflect the distinction.

Participants also saw tenant participation as an important tool in sustaining communities. In our view, participation is also an important tool in enabling tenant independence through empowerment.

While private rented housing policy falls outside the scope of this report, many prospective social housing tenants including those on the waiting list continue to rent privately and, for some, the insecure nature of the private rented sector does not meet their needs.

CIH recommends that central government and the housing sector:

- (a) protect security of tenancy within social housing but review relevant policy and practice to ensure there is flexibility to relocate for sound housing management reasons
- (b) enable tenants to live independently, including through support where tenants want or need it, while avoiding paternalistic approaches

(c) promote tenant empowerment through participation.

CIH recommends that central government:

(d) increase security in private rented housing.

Protect social housing security of tenancy, review policy and practice

In respect of housing management, a number of research participants raised areas where social housing could do better in the context of welfare reform and changing demographics including household sizes and our ageing population.

"Moving people out of larger housing is absolutely crucial. We need a proper strategy for downsizing. It's difficult to do in a system where downsizing may be completely unacceptable in the political context. But if you provide older people with support and opportunities for repairs to be done for example, some people could be persuaded to downsize. However instead of a proper strategy for downsizing we have the bedroom tax." - Political representative

We believe that more needs to be done to address the real challenges presented by demographic change and welfare reform. In our view tenancy agreements and their terms, the legislative framework that govern secure tenancies and possessions, and housing practice all have a role to play in good stock management. This could help to ensure the right stock is available for the right needs and the right household sizes.

While acknowledging the benefits of security of tenancy, there are also clear benefits in recognising that security of tenancy does not have to mean security of tenure within the same property. In some cases, while recognising the real sensitivities surrounding relocations, it will be appropriate for a social landlord to secure alternative accommodation for a tenant for stock management and tenancy sustainment reasons.





To this end, it may be necessary to undertake a review of policy and practice to ensure that the required level of flexibility is being facilitated. It may be helpful to undertake this review as part of a strategic approach, for example as part of a strategy for downsizing or a strategy for ageing.

Of course this shouldn't mean that social landlords resort to legislative routes as a default to managing stock effectively. In many cases voluntary approaches will be appropriate and indeed the preferred method, including incentives. However consideration of stock management, the reasons for it and ultimately the people who it benefits would form part of a greater understanding between landlords and tenants, a point which is discussed further below.

Enable tenant independence including through support; promote tenant empowerment through participation.

In relation to empowerment through participation, it is important to acknowledge that not all tenants will wish to be involved in participatory structures, instead preferring minimal contact with social landlords and this should be respected.

On the other hand, some tenants want to have a say in the services that affect them. Participatory structures empower tenants to do this, representing a welcome option that is distinct from a transactional landlord-tenant relationship defined solely as service provider and service receiver.

We believe there is more that can be done to further tenant involvement, such as scrutiny panels and mutual and co-operative governance structures. Social landlords and their boards could consider whether these structures are right for their contexts.

Meanwhile independence can be promoted through support. Similarly to empowerment, it should be acknowledged that not all tenants need or want support and this should be respected. Meanwhile, it remains vital for others including people with specialist and complex needs for example, where there is a need to ensure adequate funding to sustain supported living schemes.

However independence through support does have implications for general needs tenants as well. If one of the roles of social housing is to meet need, then it follows that the need should be addressed rather than simply alleviated by a social landlord. For example, if a working-age tenant is economically inactive, it may be appropriate to encourage him or her to take up a support service promoting employment or training pathways. This would recognise that work is an important route out of poverty (while not being a guaranteed one) in addition to a social landlord's affordable rents and help with housing costs from the state. These needs could be identified by better assessments of tenants' broader needs in addition to their housing needs.

Nevertheless it should be recognised that support services and associated charters can become a slippery slope to paternalism, where it is perceived that 'landlords know what is best' for tenants. This should be avoided. Also, it must be recognised that social landlords are not a 'pill for every ill', and pursuing support related work that is not central to the role and purpose of social housing can result in mission creep.

We believe this approach would help to underpin a new relationship between tenants and landlords that is framed more by an independence that leads to social inclusion and community resilience.

Increase security in private rented housing

The research has demonstrated the strong link between social and private rented housing policy. A common research theme was the nature and value of social housing being 'what the private sector might not be', with tenancy security featuring prominently.

The supply and demand mismatch of social housing means that many prospective social housing tenants including those on the waiting list continue to rent privately, with support of the social transfer of housing benefit. However for some people, the private rented sector does not meet their needs. So the importance of a 'whole system approach' to social housing policy incorporating private rented housing becomes more evident.

While we recognise the fundamental differences between social and private rented housing, we recommend that security in the private rented sector be improved. This is an approach that has been taken recently in Scotland and the Republic of Ireland, so these jurisdictions may serve as an evidence base for local changes.





Author: Justin Cartwright

Additional content: Yoric Irving-Clarke

Editor: Nicola McCrudden





CIH Northern Ireland Carnmoney House Edgewater Office Park Belfast BT3 9JQ

T: 028 9077 8222 E: ni@cih.org

www.cih.org/NorthernIreland

