

Consultation Response:

*Programme for Government Draft Outcomes
Framework*

March 2021

when everyone has a 

1.0 INTRODUCTION

Housing Rights is Northern Ireland's leading independent provider of specialist housing advice. For over 50 years we have been helping people to find and keep a home. We believe that prevention is better than the cure, and work to prevent homelessness wherever possible. Housing Rights' policy work is based on the views and experience of the people who contact us for advice and aims to support the identification of evidence based, user informed solutions.

1.1 Draft Outcomes Framework

Housing Rights is supportive of the broad ethos of the Draft Outcomes Framework in that the focus is on outcomes, achieved by cross departmental working. As a charity working towards a vision of when everyone has a home, Housing Rights works daily to improve the wellbeing of our clients by preventing and alleviating homelessness. A high-level government commitment to policy design and delivery which is outcomes based is therefore welcome.

Housing Rights further welcomes the Executive's Office intention that "*the new Programme for Government (PfG) will bring a new focus to deliver lasting, real and positive change in people's lives.*"¹ However, **Housing Rights believes that due to the lack of a specific housing outcome, the draft framework will fail to deliver lasting, real and positive change for those who need it most.** We therefore welcome the opportunity to respond to this consultation document and to contribute to the debate which will allow the framework to be refined.

Housing Rights also believes the draft Framework fails to appreciate the complexity of housing as an issue and in particular the central role which having a safe and affordable home plays in making a real and positive difference to the quality of people's lives.

1.2 New Decade New Approach commitment to a specific housing outcome

Housing Rights welcomes the Executive Office's assertion that the new PfG will "*reflect the messages contained in New Decade New Approach.*"² (NDNA) However, **Housing Rights is deeply disappointed about the failure to honour the NDNA commitment to a specific housing outcome** which stated:

*"The parties agree on the need for continued attention and priority to be given to housing within the Programme for Government 2020 and beyond. **The specific housing outcome and indicators, which will focus on ensuring every household has access to a good quality, affordable and sustainable home that is appropriate for its needs, will be supported by robust programmes and actions.**"*³

¹ [Programme for Government \(PfG\) | Northern Ireland Executive](#)

² [Programme for Government \(PfG\) | Northern Ireland Executive](#)

³ [2020-01-08 a new decade a new approach.pdf \(publishing.service.gov.uk\)](#)

Since the publishing of the Draft Outcomes Framework, the Minister for Communities has reinforced her commitment to ensuring housing is included as a stand-alone outcome in the forthcoming PfG.⁴

Housing Rights strongly recommends that the NI Executive honour the commitment contained in the New Decade New Approach deal to include a specific housing outcome included in the Programme for Government (PfG). This was drafted as:

“Every household has access to a good quality, affordable and sustainable home that is appropriate for its needs.”⁵

Whilst we believe this statement does provide a succinct high-level description of what the NI Executive should seek to achieve, we also recognise the importance of the wording of the Outcomes and **should alternative phrasing be considered necessary, we would welcome the opportunity to work with the Executive Office to refine this statement.**

2.0 ENGAGEMENT

Housing Rights further welcomed the NDNA commitment to develop the PfG through a process of engagement and co-design.⁶ We note that the Draft Outcomes Framework document explains that its development “*has been informed by engagement with representative groups,*”⁷ and that the PfG is “*intended to capture the range of things that experience and research suggest matter most to people.*”⁸ **Housing Rights would therefore welcome clarity on the extent to which the housing sector or public have been engaged with the decision by the Executive not to fulfil the NDNA commitment to include a housing outcome.**

In 2016, together with CHNI, CIH and NIFHA, Housing Rights co-hosted a consultation event attended by practitioners, policy makers and government officials regarding the programme for government and the inclusion of a housing specific outcome. The roundtable discussion notes, outlining the views and experiences of over 20 organisation from the housing sector were provided to the Executive Office at the time and have been **included as Appendix A to this response. We hope the views recorded in Section 2 of this Appendix will aid TEO in reflecting the views and experience of the housing sector in any redrafting of the PfG outcomes.**

Housing Rights would further welcome clarity about what the next steps in the development of the PfG are, and importantly what other opportunities there will be to engage and influence the content. **Housing Rights strongly recommends that the indicators included in the PfG are developed through a process of engagement and co-design – both with**

⁴ Plenary session NI Assembly 01/03/2021

⁵ [2020-01-08_a_new_decade_a_new_approach.pdf \(publishing.service.gov.uk\)](#)

⁶ [2020-01-08_a_new_decade_a_new_approach.pdf \(publishing.service.gov.uk\)](#)

⁷ [PfG draft Outcomes Framework consultation \(northernireland.gov.uk\)](#)

⁸ [PfG draft Outcomes Framework consultation \(northernireland.gov.uk\)](#)

organisations and, crucially, people directly impacted by the issues. Please see Section 4 of the roundtable discussion notes included in Appendix A which illustrate deliberations from the housing sector which have already been held on this issue. Housing Rights would welcome the opportunity to be part of this process going forward.

3.0 ABSENCE OF A HOUSING OUTCOME

The experience of Housing Rights' clients evidences the central importance of housing in improving wellbeing for all. Having reviewed the outcomes proposed in the draft Framework, Housing Rights shares the concerns expressed by many others regarding the absence of housing as an outcome.

3.1 Housing: a key component of wellbeing

Housing Rights further rejects the rationale given at a 2016 PfG consultation event that housing is an “*enabler*” for many other outcomes rather than a wellbeing factor in its own right. **We know from the collective experience of the people we work to support that finding a safe, secure and affordable home to live in is, like the other nine outcomes already included in the draft PfG, an end in itself which “*makes a real and positive difference to people’s lives*”⁹ and is a key component of wellbeing.**

Many of the families and individuals we work to support are living in unsafe, unsuitable and insecure accommodation. **Homelessness levels are unacceptably high and will rise as a direct consequence of the social and economic fallout from the pandemic. On December 31 2020 the social housing list stood at 42,665, over 10% higher than it had been on March 31 2020.** Around 70% of those on the list are in “housing stress” being in priority need.¹⁰

Having access to a safe and secure home is fundamental to a better future for everyone in NI. Indeed, the widely accepted psychological theory put forward by Abraham Maslow in 1943 which outlines the hierarchy of human needs, identifies shelter as a basic life need, without which, people cannot go on to have other needs met.¹¹

3.2 Housing Rights Clients’ experience

Housing can only act as an enabler for those who have access to a good quality, affordable and sustainable home. Regrettably, our extensive and growing waiting lists for social housing and continuing high levels of homelessness demonstrate this not to be the case, notwithstanding those living in inadequate housing and those struggling to meet their housing costs. Without

⁹ [PfG draft Outcomes Framework consultation \(northernireland.gov.uk\)](https://www.northernireland.gov.uk/pfg-draft-outcomes-framework-consultation)

¹⁰ Luke Butterly, “Social housing waiting list 10% higher since start of pandemic,” The Detail, 11 February 2021, accessed 15 February 2021, <https://www.thedetail.tv/articles/social-housing-waiting-list-10-higher-since-start-of-pandemic>

¹¹ Maslow, A.H. (1943). "Psychological Review 50 (4) 370–96 - A theory of human motivation".psychclassics.yorku.ca

a specific housing outcome in any forthcoming PfG, we will continue to fail those who do not have a home appropriate to their needs.

Last year Housing Rights provided direct help which prevented homelessness and improved the housing situation of around 11,500 families and individuals. People come to us with varied and wide ranging, often complex housing issues. Increasingly these relate to affordability, where they simply cannot afford to remain in their homes. For many others the issues relate to problems with private renting, difficulties accessing accommodation or maintaining it because of poor conditions or disrepair, as well as those who come to us in situations which place them on the cusp of homelessness.

Housing Rights witnesses daily the real difference which having a safe and affordable home can make for people in NI and all too often the acute and adverse impact on all aspects of the lives of those who do not.

3.3 Impact of COVID-19

The importance of “home” and the impact of not having one has been brought into even sharper focus during the coronavirus pandemic. The key messages of ‘Stay **Home**; Stay **Safe**; Save **Lives**’ has served to reinforce how critical having access to a safe and secure home is in keeping not only individuals, but everyone in our community safe. Job loss and income reduction as a result of the pandemic has had a significant impact on our clients’ ability to meet their housing costs. Since the beginning of the pandemic the social housing waiting list has risen by over 10%.¹² **Now more than ever, in order to turn the curve, it is crucial that housing and homelessness are prioritised by the Executive and we believe a specific housing outcome is the only way to drive the collaborative behaviour which will achieve this.**

4.0 COLLABORATIVE WORKING

The PfG Draft Outcomes Equality Impact Assessment, states that housing “*is not included as a standalone Outcome in the draft Framework as it is a single-issue subject that could unduly focus on the activity of building houses rather than on the benefits that flow from people having access to suitable housing.*”¹³ Housing Rights rejects this rationale. This reasoning fails to appreciate the complexity of the factors which contribute to ensuring everyone has access to a good quality, affordable and sustainable home that is appropriate for its needs, which go well beyond the activity of building houses. With the right outcome and indicators, it would not be difficult to avoid an undue focus solely on the activity of building houses. **We would welcome the opportunity to work with the Executive Office on developing appropriate indicators in order to ensure the housing outcome captures these complex, cross-departmental issues**

¹² Luke Butterly, “Social housing waiting list 10% higher since start of pandemic,” The Detail, 11 February 2021, accessed 15 February 2021, <https://www.thedetail.tv/articles/social-housing-waiting-list-10-higher-since-start-of-pandemic>

¹³ [PfG draft Outcomes Framework Equality Impact Assessment Consultation Document \(northernireland.gov.uk\)](#)

and provides a focus on the benefits delivered. For example such indicators could include:

Indicator: Addressing affordability

Potential indicator wording:

1. % of households spending more than 30% of household income on housing costs
or
2. % of households at risk of poverty after housing costs

Source: Family Resource Survey (NISRA)

4.1 Cross departmental co-operation

Housing Rights strongly believes that delivering on a housing outcome & eradicating homelessness in our community requires cross departmental and cross sectoral co-operation – working across traditional boundaries beyond the Department for Communities to Economy, Infrastructure, Health, Education, Justice and Agriculture, Environment & Rural Affairs.

4.1.1 Housing and health

It is well established, for example, that housing is one of the biggest determinants of the health of any population. In 2016 the Northern Ireland Housing Executive (NIHE) reported that the cost to the NHS in dealing with ‘Category 1 Hazards’¹⁴ which are deemed to equate to ‘poor housing,’ was £39.5 million per year.¹⁵ NIHE further reported that this cost to the NHS only represents 10% of total societal costs of poor housing, which are estimated to be £401million per annum.¹⁶ Prioritising the prevention of homelessness and the improvement of homes therefore has cascading and multiple impact on our health and on the public purse. This inter-relation between health and homelessness has been brought into even sharper focus by the pandemic, as reinforced by the key messages of ‘Stay **Home**; Stay **Safe**; Save **Lives**.’

4.1.2 The cost of homelessness

In addition to the cost of poor housing, homelessness has significant financial implications across the public sector, as the Northern Ireland Audit Office (NIAO) highlighted in their 2017 report on Homelessness in Northern Ireland.¹⁷ Indeed the annual cost to the NI public purse of each homeless presentation was estimated in 2015 to range from £4,972.36 to £36,119.34 (depending on the complexity of the situation), with the average deemed to be £15,470.¹⁸

4.1.3 Housing and criminal justice

The impact of housing on criminal justice is also evidenced, a Ministry of Justice report in 2012 for example, identified that 37% of prisoners being released had nowhere to live; 79% reported being homeless before being reconvicted and

¹⁴ These include excess cold, damp & mould, and falls on stairs

¹⁵ <https://www.nihe.gov.uk/Documents/Research/HCS-2016-Additional-Reports/The-cost-of-poor-housing-in-Northern-Ireland-2016.aspx>

¹⁶ <https://www.nihe.gov.uk/Documents/Research/HCS-2016-Additional-Reports/Blue-cost-of-poor-housing-in-Northern-Ireland-2016.aspx>

¹⁷ [Homelessness in Northern Ireland Full Report_0.pdf \(niauditoffice.gov.uk\)](https://www.niauditoffice.gov.uk/Homelessness-in-Northern-Ireland-Full-Report-0.pdf)

¹⁸ “Calculating the cost of homelessness in Northern Ireland? A desk-based study of the range of costs relating to homelessness” Fiona Boyle, 2015

60% believed that a place to live was important in stopping them from reoffending.¹⁹

4.1.4 *Housing and the economy*

In the context of the Covid-19 outbreak and the subsequent economic impact felt by many communities and sectors, we believe that a real opportunity exists to focus on a housing-led economic and social recovery. **A specific housing outcome, with appropriate key priority areas and ambitious targets, has the potential to drive economic growth through construction and associated industries as well as to improve wellbeing through alleviating chronic housing problems of those impacted by them.** The newbuild programme provides a £1Bn economic multiplier effect each year for the regional economy, when we include the wider supply chain.²⁰

Including a standalone housing outcome would therefore directly support the government's stated aim of "*building a strong and prosperous society by tackling disadvantage and achieving sustainable economic growth.*"²¹

4.2 Key Priority Areas and related strategies

4.2.1 Key Priority Areas, which are non-housing specific, and could be linked to a standalone housing outcome include:

- Better jobs
- Built Environment
- Care and Support
- Disability
- Early Intervention and Rehabilitation
- Green Economy
- Inclusion and Tackling Disadvantage
- Mental Health and Well Being
- Skills and Attainment
- Tackling Sectarianism, Building Respect and Identity
- Water and Wastewater Management

4.2.2 Key executive strategies, beyond specific housing strategies, which could be linked to a housing outcome to help drive collaborative working include:

- Anti-Poverty strategy
- Apprenticeship Strategy
- Children & Young Peoples Strategy
- Disability Strategy
- Economic strategy
- Education and Skills strategy

¹⁹ [The factors associated with proven re-offending following release from prison: findings from Waves 1 to 3 of SPCR \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

²⁰ <https://nifha.org/site/wp-content/uploads/2020/12/NIFHA-Sector-Global-Accounts-2020-FINAL.pdf>

²¹ [PfG draft Outcomes Framework consultation \(northernireland.gov.uk\)](https://www.northernireland.gov.uk)

- Energy Strategy
- Environment Strategy
- Fuel poverty Strategy
- Health & Well Being 2026: Delivering Together
- Investment strategy
- Mental Health Strategy
- NIHE Draft Supporting People
- Prisons 2020
- Rural Affairs
- Strategy for Looked After Children

5.0 ADDITIONAL COMMENTS

In addition to Housing Rights' fundamental concern about the failure to include housing as a standalone outcome, there are a number of other comments we wish to make in relation to the consideration of housing within the document.

5.1 Housing as a Key Priority Area

In addition to the welcome inclusion of housing as a Key Priority Area (KPA), under Outcome 2,²² Outcome 8²³ and Outcome 9,²⁴ **Housing Rights urges the Executive Office to also include housing as a KPA under each of the following outcomes:**

- **Outcome 1: Our children and young people have the best start in life**
- **Outcome 3: We have an equal and inclusive society where everyone is valued and treated with respect**
- **Outcome 4: We all enjoy long, healthy active lives**
- **Outcome 5: Everyone can reach their potential**
- **Outcome 6: Our economy is globally competitive, regionally balanced and carbon- neutral**
- **Outcome 7: Everyone feels safe- we all respect the law and each other**

5.1.1 Outcome 8: We have a caring society that supports people throughout their lives

Housing Rights welcomes the inclusion of housing as a KPA under Outcome 8, however the descriptor²⁵ fails to make reference to the prevention of homelessness, nor to the role of the private rented sector (PRS). The PRS in NI has grown significantly from 8% of all households in 2003 to 19% in 2019,²⁶ meaning more people now live in this sector than in social homes, and it is increasingly relied upon by low-income families with children. The issues that exist in the PRS with regards to standards, security, and affordability are

²² We live and work sustainably- protecting the environment

²³ We have a caring society that supports people throughout their lives

²⁴ People want to live, work and visit here

²⁵

²⁶ <https://www.communities-ni.gov.uk/system/files/publications/communities/frs-201819.pdf>

evidenced in the fact that loss of rented accommodation is among the top three causes of homelessness in Northern Ireland.²⁷ Furthermore, the pandemic has had a disproportionate impact on private renters, who made up almost three quarters of the COVID related calls we received to our helpline at the beginning of the pandemic.

Housing Rights therefore recommends that the descriptor of housing as a KPA under Outcome 8 be expanded to include reference to regulation of the private rented sector and prevention of homelessness by supporting people to maintain their homes. We would welcome the opportunity to work with the Executive Office to refine this descriptor.

5.2 Housing and Homelessness strategies

Whilst Housing Rights appreciates that the strategies under each of the outcomes are not an exhaustive list, we believe the **Housing Supply Strategy is a key document which, like the Anti-Poverty Strategy, is currently being developed, but conversely is not referenced anywhere in the document.** Furthermore, the Northern Ireland Housing Executive's Homelessness Strategy which provides strategic direction for addressing homelessness in NI, is not mentioned under any of the outcomes.

Housing Rights believes the Housing Supply and Homelessness strategies are key in delivering the PfG outcomes and should be explicitly referenced as strategies to help deliver the KPAs as follows:

Outcome 1: Our children and young people have the best start in life

- Housing Supply Strategy
- Homelessness Strategy

Outcome 2: We live and work sustainably- protecting the environment

- Housing Supply Strategy

Outcome 3: We have an equal and inclusive society where everyone is valued and treated with respect

- Housing Supply Strategy
- Homelessness Strategy

Outcome 4: We all enjoy long, healthy active lives

- Housing Supply Strategy
- Homelessness Strategy

Outcome 5: Everyone can reach their potential

- Housing Supply Strategy
- Homelessness Strategy

Outcome 6: Our economy is globally competitive, regionally balanced and carbon-neutral

- Housing and Housing Supply Strategy

Outcome 7: Everyone feels safe- we all respect the law and each other

- Homelessness Strategy

Outcome 8: We have a caring society that supports everyone throughout their lives

²⁷ [Northern Ireland Housing Bulletin October-December 2020 \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk/publications/northern-ireland-housing-bulletin-october-december-2020)

- Housing Supply Strategy
 - Homelessness Strategy
- Outcome 9: People want to work, live and visit here*
- Housing Supply Strategy

6.0 CONCLUSION

Housing Rights strongly believes that if the PfG is to succeed in prioritising the things that matter most to people in NI, **it is essential that:**

- **A specific housing outcome is included in the PfG, honouring the New Decade New Approach commitment to an outcome with a focus on ensuring “Every household has access to a good quality, affordable and sustainable home that is appropriate for its needs.”**
- **The importance of getting the “wording” of the Housing Outcome right, does not preclude its inclusion. Should alternative phrasing be considered necessary, we would welcome the opportunity to work with the Executive Office to refine this statement.**
- **The housing sector, and people directly impacted by issues regarding poor housing and homelessness, are meaningfully involved in the ongoing development of the PfG.**
- **Housing is added as a Key Priority Area under Outcomes 1,3,4,5,6 and 7.**
- **Key housing strategies such as the Housing Supply Strategy and the NIHE Homelessness strategy are explicitly referenced under the relevant outcomes (see 5.2 above).**

Housing Rights are grateful for the opportunity to respond to this consultation. For further information on this submission, please contact Housing Rights’ Policy and Public Affairs Officer, Kerry Logan at kerry@housingrights.org.uk.