

# Housing Rights

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@housingrightsNI

## Consultation Response

# Response to the Programme for Government consultation & comments on the Delivery Plan for indicators 8 and 48

December 2016

when everyone has a home

## 1. Introduction

Housing Rights is Northern Ireland's leading housing advice charity, working to ensure that everyone has a home for over fifty years. Its services are delivered throughout Northern Ireland and focus on key areas of preventing homelessness, accessing accommodation and tackling affordability and poor housing conditions.

The organisation works to achieve positive change by protecting and promoting the rights of people who are in housing need and our policy work is based on the experiences of our clients.

Housing Rights offers the following comments on the draft Programme for Government (PfG) (see particularly paragraphs 3-4) and the Delivery Plan for Indicators 8 and 48 (see particularly paragraphs 5-8), on this basis.

## 2. Summary

- 2.1. **Housing Rights, along with other stakeholders, gave serious consideration to the draft Framework PfG published early this year. It was with disappointment and concern therefore, that key concerns relating to the PfG Framework were not addressed in the revised version published for consultation in October.**
- 2.2. **Despite the addition of a second housing related indicator, the revised draft Programme for Government's emphasis on housing has been reduced significantly from the original draft. Housing is now linked to only two of the fourteen outcomes. This is a reduction from the previous draft which linked housing to seven outcomes.**
- 2.3. **Without appropriate recognition of these links in the PfG, as the principal policy document of the NI Executive, the necessary commitment and resources for important work, particularly with regards to homelessness, could be found lacking which would completely undermine the momentum being created in this area.**
- 2.4. **Housing Rights would prefer the use of an 'after housing costs' measure in the indicator relating to the % of those living in relative or absolute poverty. One reason for this is that housing costs are effectively a 'given' and must be met; it is the money left over after that that is therefore the measure of its standard of living. It would also allow a more accurate picture of living costs and poverty to be monitored which recognises the pressure people are under to meet housing costs.**
- 2.5. **A reading of the current draft PfG sections which relates to indicators 8 and 48, as well as the Delivery Plan for these indicators, identifies omissions and misunderstandings which serve to undermine the credibility of this process. Housing Rights appreciates that the Delivery Plan is a live document and strongly recommends that the Department review the content of the plan to ensure that omissions and misunderstandings are amended without delay. Having the correct point**

of departure for the important work the Department has to deliver on in this plan, will ensure that the efforts which flow from this can be maximized.

- 2.6. The evidence base and rationale for certain key activities listed in the Delivery Plan is unclear. In relation to the proposal to explore introducing 'pay to stay' in Northern Ireland, there appears to be no recognition that the tenant profile in Northern Ireland is not the same as in some parts of England with it relatively unheard of for a tenant here to have an income of over £60,000.
- 2.7. The activities listed under the actions in the Delivery Plan, as in the main narrative of both the Plan and the relevant sections of the PfG, are heavily weighted in emphasis towards the social and owner occupied sector. Activities relevant to the private rented sector are limited despite the sector's increasing importance in addressing housing need.
- 2.8. The Delivery Plan could be significantly strengthened if actions under points 1 and 2 included an action to examine the role of institutional investment and the potential for housing associations in the private rented sector.
- 2.9. Action 3 could be strengthened with a commitment to adopt the Housing, Health and Safety Rating System (HHSRS) which is one of the options considered in the fitness review. The HHSRS integrates health and housing and is in line with the cross departmental outcomes focus of the PfG.
- 2.10. With specific reference to action 4, and more generally to the equality impact of the Delivery Plan, consideration should be given to how to promote equality for groups experiencing inequality which have been recently highlighted by the Equality Commission.
- 2.11. Whilst Housing Rights welcomes actions targeted at helping people access affordable housing in action 5, proportionately less emphasis is given to the private rented sector, where most people on low incomes now live.
- 2.12. Housing Rights would encourage the Department to balance activities designed to improve access to home ownership, with activities which ensure people can sustain home ownership. Housing Rights notes that the Department is particularly keen to ensure access to home ownership for under-represented groups such as older people and those with disabilities. It is especially critical that these groups and other vulnerable groups are supported to sustain accommodation, not just to access it.
- 2.13. The role of financial institutions (and indeed of government) in preventing home repossession is absent from the Delivery Plan. It would be appropriate and useful for the Delivery Plan to include specific activities/ actions in relation to this issue to ensure that progress is achieved.

**2.14. As Northern Ireland's leading provider of specialist housing and housing debt advice, Housing Rights would welcome the opportunity to be involved in the monitoring of the Delivery Plan in relation to these actions. Last year Housing Rights helped over 10,000 people with over 40,000 housing issues across Northern Ireland. The organization is uniquely placed to contribute to the Delivery Plan in light of our experience working with people who live in all tenures and with those who are homeless and we believe that we could be of significant assistance to the Department in this regard.**

### **3. Overarching concern**

Housing Rights is supportive of the broad ethos of the draft Framework in that the focus is on outcomes and 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 homelessness. A high level government commitment to policy design and delivery which is outcomes based is therefore welcome.

In this spirit, Housing Rights gave serious consideration to the draft Framework PfG published early this year. In addition to a detailed organizational response to the consultation, Housing Rights joined with Council for the Homeless, CIH and NIFHA to host a consultation event<sup>1</sup> during which detailed comments from stakeholders were gathered and fed back into the consultation process.

**It was with disappointment and concern therefore, that key concerns relating to the PfG Framework were not addressed in the revised version published for consultation in October.**

Whilst not proposing to rehearse in detail the concerns outlined in Housing Rights' earlier response, a summary of the key points is outlined below.<sup>2</sup>

- Housing Rights is deeply concerned that the Programme for Government contains only slight reference to housing and that even this is construed in the narrowest of terms. In doing so, both the complexity of housing policy and practice are misinterpreted and the significant role housing plays in improving wellbeing for all is unrecognised.**

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<sup>1</sup> 'Making Housing Matter; A Programme for Government Consultation event' co-hosted on Tuesday 5<sup>th</sup> July 2016 by Housing Rights, Council for the Homeless, NIFHA and CIH. For more about the event, please see:

<http://www.housingrights.org.uk/news/housing-should-matter-in-the-programme-for-government>

<sup>2</sup> Housing Rights' response to the Draft programme for Government Framework can be accessed in full at:

<http://housingrights.org.uk/sites/default/files/policydocs/HousingRights-consultation-response-on-draft-Programme-for-Government-Framework-July-2016.pdf>

- **As both an end in and of itself and an enabler towards the achievement of other outcomes, Housing Rights recommends that the NI Executive adopt a housing specific outcome. Suggested wording for this outcome, devised by Housing Rights, Council for the Homeless, NIFHA and CIH is “*We have good quality, affordable homes for everyone*”.**
- **Housing Rights has serious reservations about the use of an indicator which relates to the number of people in housing stress. No revision has been made to this indicator and the deficit is not addressed with the addition of a second indicator. The Programme for Government should firmly recognise that government responsibilities towards housing are cross tenure, more complex than social housing demand or supply and not capable of being appropriately monitored through the indicators proposed.**
- **A more realistic approach to measuring outcomes through indicators and measures could be achieved by the use of additional housing specific indicators; these could relate to the prevention of homeless, affordability, housing fitness /conditions and the reduction of housing inequalities.**

In addition to these unaddressed concerns, Housing Rights wishes to make the following comments on the revised draft Programme for Government.

#### **4. Specific concerns with the revised draft Programme for Government**

##### **4.1. Reduction in outcomes linked to housing indicators**

**Despite the addition of a second housing related indicator, the revised draft Programme for Government’s emphasis on housing has been reduced significantly from the original draft. Housing is now linked to only two of the fourteen outcomes;** with housing now linked only to; ‘We care for others and we help those in need’, and; ‘We connect people and opportunities through our infrastructure’.. **This is a reduction from the previous draft which linked housing to seven outcomes.** No explanation is given for the removal of housing from the following outcomes;

- We enjoy long healthy active lives
- We are a shared society that respects diversity
- We have high quality public services
- We have created a place where people want to live and work, to visit and invest
- We give our children and young people the best look in life

Housing Rights also notes that despite the contributions from many stakeholders during the previous consultation, the link between the economy and housing has not been recognized.

Housing Rights is particularly disappointed that the draft Programme for Government no longer recognises, in any sense, the link between housing and health and housing and criminal justice. This is at odds with common sense, best practice and government policy which is increasingly seeking to recognise the impact of poor housing (or the absence of a home) on the health and wellbeing of people.

It is well established, for example, that housing is one of the biggest determinants of the health of any population. Research by the NIHE identified a potential annual saving to the NHS in Northern Ireland of £33million if targeted improvements were made to housing.<sup>3</sup> Additional research points to the cost of homelessness to the NHS as being between £24,000 and £30,000 per annum per individual. Prioritising the prevention of homelessness and the improvement of homes therefore has cascading and multiple impact on our health and on the public purse.

Of the further research carried out, 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 60% believed that a place to live was important in stopping them from reoffending.<sup>4</sup>

It is particularly alarming that this limited emphasis is at odds with the cross Departmental work being discussed in relation to homelessness, with work underway to develop a cross Departmental Action Plan to support the new NIHE Homelessness Strategy. **Without appropriate recognition of these links in the PfG, as the principal policy document of the NI Executive, the necessary commitment and resources for important work could be found lacking which would completely undermine the momentum being created in this area.**

#### **4.2. Definition of poverty**

Chief amongst the concerns of those who contact Housing Rights for advice and assistance with their housing costs is the issue of affordability, which now rates as the fastest growing issue on the organisation's Helpline. As an organisation which works across all housing tenures, Housing Rights deals with affordability issues relating to how people both access and sustain their homes. These issues vary from housing benefit entitlement, tenancy deposit protection, rent arrears in both social and private rented sector accommodation and mortgage arrears and repossessions.

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<sup>3</sup> (2012) Davidson, M. et al, The Cost of Poor Housing in Northern Ireland, available at: [http://www.nihe.gov.uk/cost\\_of\\_poor\\_housing\\_in\\_ni.pdf](http://www.nihe.gov.uk/cost_of_poor_housing_in_ni.pdf)

<sup>4</sup> (2013) Brunton-Smyth, I. et al, The factors associated with proven re-offending following release from prison: findings from Waves 1-3 of SCPR, available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/491119/re-offending-release-waves-1-3-spcr-findings.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/491119/re-offending-release-waves-1-3-spcr-findings.pdf)

Housing Rights' understanding of housing issues is therefore intrinsically linked to issues of poverty.

The Joseph Rowntree Foundation's 2016 report 'Monitoring Poverty and Social Exclusion in Northern Ireland'<sup>5</sup> identified that *after* housing costs, one in five people in Northern Ireland were in poverty. The report particularly highlighted that there has been a significant increase in the number of people in poverty living in the Private Rented Sector, to the extent that there are now more people in poverty in this sector than in social housing.

This position is likely to become considerably worse. A report from Fabian Society predicts the shortfall between rent and housing benefit will rise by 300% by 2020 and, unless benefit levels rise, by 800% by 2030.

**Housing Rights notes with concern the use of a 'before housing costs' measure in the indicator relating to the % of those living in relative or absolute poverty. Housing Rights would prefer that an 'after housing costs' measure (as is used by JRF and others) is used. One reason for this is that housing costs are effectively a 'given' and must be met; it is the money left over after that that is therefore the measure of its standard of living. It would also allow a more accurate picture of living costs and poverty to be monitored which recognises the pressure people are under to meet housing costs.**

## **5. The Delivery Plan for Indicators 8 and 48**

Housing Rights wish to make the following specific comments in relation to the PfG Delivery Plan for indicators 8 and 48, which relate to outcomes 13 and 8 respectively. A copy of these comments will also be submitted to the Department for Communities under whose responsibility, these indicators fall. They are included here, however, since some aspects of the content of the Delivery Plan are also replicated in the specific sections of the PfG relevant to each outcome.

### **5.1. Omissions in the analysis**

The housing indicators selected in the draft PfG focus on a limited aspect of government's role in relation to housing. Comments about the inappropriateness of, for example, an indicator based on the numbers of people in housing stress, have already been well rehearsed. Housing Rights points to previous comments on this issue.

**A reading of the current draft PfG sections which relates to these indicators, as well as the Delivery Plan, identifies critical omissions from the analysis.**

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<sup>5</sup> (2016) Joseph Rowntree Foundation, 'Monitoring Poverty and Social Exclusion in Northern Ireland' available at: [file:///C:/Users/kate/Downloads/ni\\_mpse\\_findings\\_2016\\_final%20\(1\).pdf](file:///C:/Users/kate/Downloads/ni_mpse_findings_2016_final%20(1).pdf)

**Housing Rights earnestly requests that the analysis of the problem is reviewed urgently. Failure to do so at this early stage, we believe would undermine the credibility of the process and significantly reduce the capacity of the Delivery Plan to achieve its aims.**

Pages 107-08 of the PfG for example, states that in the last 25 years the housing market in Northern Ireland has been characterised by four key trends (only 3 however are mentioned). These trends are listed as;

- an increase in the number of households,
- the inability of the construction sector to build enough houses to match household growth, and;
- house price inflation.

**In the last 25 years there has been an unparalleled growth in the private rented sector in Northern Ireland.** Data from the Northern Ireland Housing Statistics identifies that private rented sector stock has grown from 3.3% in 1991<sup>6</sup>, to 17% in 2016<sup>7</sup> (more than a fivefold increase). **This is a key market trend which is completely omitted from the analysis.**

## **5.2. Misunderstandings**

The same paragraph of the PfG accurately identifies the growth in house prices in the period between the mid-1990s and 2008. However, the assertion is then made that, *“this has impacted on the affordability of home ownership for many households, who then looked to the social rented sector.”*

This same language appears in the Delivery Plan (page 5). This assertion is further repeated later on the same page which states;

*“as housing supply lagged behind demand and house prices made home ownership less affordable, more people found the social housing sector to be their only viable option and the numbers on the waiting list, including those in housing stress, grew”.*

As a leading provider of housing and housing debt advice across all housing tenures, this has not been the experience of our clients. In our experience which has involved targeted work to assist people unable to access and sustain accommodation, the only realistic option for those unable to access home ownership was and remains the private rented sector. Indeed, it is also the experience of our advisors that it has not been a realistic option for these people to seek social housing, with many not even registering to be on the waiting list.

**Housing Rights appreciates that the Delivery Plan is a live document and strongly recommends that the Department review the content of the plan to**

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<sup>6</sup> (2001) Northern Ireland Housing Statistics

<sup>7</sup> (2016) Northern Ireland Housing Statistics accessed at: <https://www.communities-ni.gov.uk/sites/default/files/publications/communities/ni-housing-stats-15-16-full-copy.pdf>

ensure that omissions and misunderstandings are amended without delay. Having the correct point of departure for the important work the Department has to deliver on in this plan, will ensure that the efforts which flow from this can be maximized.

### 5.3. Evidence base for actions listed in the Delivery Plan

**Housing Rights notes that the rationale for the inclusion of several Delivery Plan actions is unclear and apparently without foundation.** Page 11 for example, notes the following action;

*“We will explore the potential to introduce a ‘pay to stay’ principle into social housing to ensure that high earning households living in a social home pay a fair economic rent”*.

Housing Rights is aware of the ‘pay to stay’ scheme in England under which social landlords can charge tenants with an income of over £60,000, market or near market rents. Housing Rights is also aware that proposals to broaden the discretionary scheme to a mandatory scheme in England have since been withdrawn. It is, however, concerning to note that there appears little awareness that the same social housing tenant profile which exists in some areas of England, does not exist in Northern Ireland. Housing Rights would welcome publication of any information which indicates that there are social tenants in Northern Ireland who currently have such incomes. There would seem, therefore, a questionable evidence base for the consideration of such a scheme here.

Similarly, Housing Rights notes the inclusion of the following action, also on page 11; *“We will review the policy and legislation on social tenancies to promote greater flexibility in the use of current stock to meet better need”*.

It is unclear as to both the evidence base and rationale for such a review. Housing Rights would welcome clear information about this proposed action.

## 6. Comments on specific actions

As is clear from the opening sections of the Delivery Plan which relate to the analysis of the problem, the heavy emphasis of the Delivery Plan is on the social rented and owner occupied sectors of the housing market. Only one private rented sector specific activity (review of the role and regulation of the private rented sector) is included. **The absence of meaningful discussion or emphasis in the plan on the private rented sector is, we believe a significant oversight, particularly given that over 20% of households in Northern Ireland now rent privately.**

### 6.1. Actions 1 & 2: Supply

In relation to supply, for example, the actions listed (points 1 and 2) do not represent the significant policy work currently being progressed in relation to the review of the private rented sector.

At Housing Rights' recent conference on the private rented sector, '*Getting it Right*', speakers discussed the supply challenge in the sector. Speakers included Professor Tony Crook, from the University of Sheffield, who presented on the role of institutional investment and housing associations in the English private rented sector and Clare McCarty, Group Chief Executive of Clanmil who detailed the housing association's pilot schemes in the private rented sector.

**The Delivery Plan could be significantly strengthened if actions under points 1 and 2 included an action to examine the role of institutional investment and the potential for housing associations in the private rented sector.**

## **6.2. Action 3: ensuring housing is good quality**

Housing Rights welcomes the commitment to review the current statutory fitness standard and has already been involved in the stakeholder group established to progress this work.

**This action could be strengthened significantly with a commitment to adopt the Housing, Health and Safety Rating System which is one of the options considered in the review.**

The Housing Health and Safety Rating System (HHSRS) was introduced in England and Wales in 2006 and in the United States of America in 2010. The HHSRS links health and housing by assessing homes not merely on bricks and mortar, but also by assessing the resulting risks to health.

The HHSRS categorises property defects according to risk category, with Risk 1 being the highest. Using the abbreviated form of the HHSRS, the latest House Condition Survey data (2011) identifies that one in ten (10%) of properties in Northern Ireland as having one or more Category 1 risks. This equates to approximately 75, 800 dwellings.<sup>8</sup> Research commissioned by the NIHE identifies significant savings to the NHS of £33 million per year if Category 1 risks were remedied. There is therefore a significant opportunity presented by the adoption of the HHSRS in view of the approach taken in the draft Programme for Government Framework.<sup>9</sup>

## **6.3. Action 4: Reducing segregation**

Housing Rights acknowledges the inclusion of actions to reduce segregation in housing, particularly those which relate to mixed tenure housing. **It may be**

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<sup>8</sup> (2011) NIHE, House Condition Survey, p.71 available at;

[http://www.nihe.gov.uk/northern\\_ireland\\_house\\_condition\\_survey\\_main\\_report\\_2011.pdf](http://www.nihe.gov.uk/northern_ireland_house_condition_survey_main_report_2011.pdf)

<sup>9</sup> Housing Rights consultation response to the DfC consultation on the review of the minimum statutory fitness standard is available here;

[http://www.housingrights.org.uk/sites/default/files/policydocs/HousingRights\\_fitness\\_review\\_response\\_June2016-1.pdf](http://www.housingrights.org.uk/sites/default/files/policydocs/HousingRights_fitness_review_response_June2016-1.pdf)

**appropriate however, to consider how, in light of the recent findings of the Equality Commission’s research into inequalities in housing (also noted in this Delivery Plan) these actions could be strengthened, in order to promote equality for groups experiencing inequality e.g. minority ethnic communities etc.**

If this action is limited to those activities which promote shared housing, the Department may wish to consider creating an additional action which is specifically in regard to the promotion of equality for groups experiencing inequality – in line with its Section 75(1) of the Northern Ireland Act 1998 duties.

#### **6.4. Action 5: Helping people access affordable housing**

Whilst Housing Rights welcomes actions targeted at helping people access affordable housing **proportionately less emphasis is given to the private rented sector, where most people on low incomes now live.**

Of the six activities listed under this action, one relates to the sector and relates to the overarching review of the sector’s role and regulation which is currently underway. **Housing Rights would welcome more specific activities for this sector being listed under this action, as have been done for both the owner occupied and social housing sectors.**

As has been noted elsewhere in this response, Housing Rights queries the evidence base for including several of the activities under this action. Primarily these relate to the activities regarding the review of the policy and legislation on social tenancies and exploring the introduction of a ‘pay to stay’ social housing scheme.

Housing Rights, notes the inclusion of activities which relate to improving access to home ownership. In light of experience providing housing and debt advice, particularly to those facing mortgage repossession, **Housing Rights would encourage the Department to balance activities designed to improve access to home ownership, with activities which ensure people can sustain home ownership.**

It is the particular experience of our Mortgage Debt Advice team, for example that many people who accessed home ownership through the Right to Buy scheme went on to have significant difficulty sustaining their accommodation. Early access to independent housing advice is critical to support people to make the appropriate housing choice for them. However, ensuring that people are able to make informed choices about the affordability/ sustainability of home ownership as a housing option for them, is critical. **Housing Rights notes that the Department is particularly keen to ensure access to home ownership for under-represented groups such as older people and those with disabilities. It is especially critical that these groups and other vulnerable groups are supported to sustain accommodation, not just to access it.**

Housing Rights notes that financial institutions which provide mortgages are listed as a delivery partner for several activities in this action, and that delivery actions include those which relate to affordable housing products for first time buyers. It should however be noted, that **the role of financial institutions (and indeed of government) in preventing home repossession is absent from the Delivery Plan.**

The Housing Repossessions Taskforce which was convened by the Department for Social Development (now Communities) and which delivered its Final Report in February 2015, made 20 recommendations which aimed to assist affected households. Many of these recommendations require the engagement of mortgage lenders in Northern Ireland.

Specifically in relation to lenders, the Taskforce recommended that lenders:

- consider the development of additional products such as “mortgage porting”, to assist people who are in negative equity;
- look at innovative forbearance options implemented in other jurisdictions and consider making them available in NI; and
- develop an Assisted Voluntary Sale option for their customers and offer this at an early stage.

Despite these recommendations, there has been little evidence to date of any meaningful engagement by lenders in work to substantively progress these recommendations. **It would therefore be appropriate and useful for the Delivery Plan to include specific activities/ actions in relation to this issue to ensure that progress is achieved.**

#### **6.5. Action 6: Meeting the needs of the most vulnerable**

Housing Rights welcomes activities relating to meeting the needs of the most vulnerable.

**Housing Rights particularly welcomes the recognition of the critical role advice can have in preventing homelessness.** It is widely accepted that independent advice, in particular plays a key role in complementing advice administered by statutory agencies and in supporting homelessness prevention. Housing Rights particularly welcomes the acknowledgment of the importance of effective advice provision in preventing homelessness due to mortgage repossession. **In the last year (15/16), across our services, Housing Rights prevented homelessness for 1096 households who came to us for independent housing advice. We estimate that this year, this saved the public purse an estimated £16,555,120.**

## **7. Delivery Partners**

Housing Rights notes that the Delivery Plan identifies providers of housing advice as key delivery partners with specific responsibility for 8 of the 27 actions listed. The Delivery Plan further notes that the evaluation plan will be drawn up in consultation with key partners.

**As Northern Ireland's leading provider of specialist housing and housing debt advice, Housing Rights would welcome the opportunity to be involved in the monitoring of the Delivery Plan in relation to these actions. Last year Housing Rights helped over 10,000 people with over 40,000 housing issues across Northern Ireland. The organization is uniquely placed to contribute to the Delivery Plan in light of our experience working with people who live in all tenures and with those who are homeless and we believe that we could be of significant assistance to the Department in this regard.**

## 8. Equality

Housing Rights notes that the Equality Screening form for the Delivery Plan has been published and that a decision has been taken that the Plan does not require a full Equality Impact Assessment.

Whilst both the Equality Commission draft statement and the Wallace research report on Key Inequalities in Housing and Communities in Northern Ireland are referenced in the Screening form and the Delivery Plan, it is disappointing that key findings of both are not integrated fully into the actions.

Particularly with reference to the following findings of the research, there is no emphasis in the Delivery Plan on measures which could address such inequality:

- Access to adequate accommodation for Irish Travellers is limited, with some experiencing a lack of basic amenities.
- Migrant workers are often subject to tied accommodation with poor conditions and overcrowding.
- The homes of minority ethnic people and migrant groups may be vulnerable to racial attacks.
- Lesbian, gay and bisexual (LGB) people can feel harassed and unsafe in their own homes and neighbourhoods.

**Housing Rights would welcome specific information about how the Delivery Plan will positively promote equality for all disadvantaged groups, particularly those highlighted by the Equality Commission in recently published research.**

For further information about any of the issues raised in this response, please contact Housing Rights' Policy & Practice Manager, Kate McCauley on 02890 245640 or by email at [kate@housingrights.org.uk](mailto:kate@housingrights.org.uk)

