

# Housing Rights

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@housingrightsNI

## Consultation Response

# Response to the consultation on a draft Programme for Government Framework

July 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 Framework on this basis.

## 2. Summary

- **Housing Rights welcomes the broad ethos of the draft Framework in that the focus is on outcomes and achieved by cross departmental working. In its current form, however, the organisation is concerned that the draft Framework would fail to deliver the ambition of its stated purpose to improve wellbeing for all.**
- **Specifically, Housing Rights is concerned that the process for selecting outcomes and indicators appears flawed; that there is an overreliance on quantitative measures and a confusion between indicators and outcomes.**
- **Housing Rights is deeply concerned that the draft Framework 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.**
- **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 the suggested housing specific indicator and measure. The reasons for this are explained in full in this response. The draft Programme for Government Framework should firmly recognise that government responsibilities towards housing are cross tenure, more complex than supply and not capable of being appropriately monitored through the measure 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.**
- **Housing Rights would be pleased to further contribute to the development of the draft Framework and Action Plans.**

### **3. Overarching concerns**

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.

However, having given serious consideration to the content of the framework, including through the co-hosting of a consultation event<sup>1</sup> attended by practitioners, policy makers and government officials, Housing Rights is deeply concerned that the draft Framework, in its current form would fail to deliver change for those who need it most.

#### **3.1. Draft Framework development process**

On 27<sup>th</sup> May 2016 the Programme for Government consultation was launched with the publication of the draft Framework document.

Despite the reference in the document that its content “*reflects the messages that emerged from extensive stakeholder engagement*”<sup>2</sup> there is little indication of how and on what basis, the content of the draft Framework was decided. Furthermore, no further information is provided as to the interests represented in the stakeholder engagement which is referred to.

Without a stated value and evidence base for the draft Framework’s development, it is difficult to meaningfully interrogate the soundness of the rationale used by the Northern Ireland Executive in selecting outcomes, indicators and measures. Without this, a perception may exist that the overarching framework for government policy can be influenced by personal and political preferences, instead of evidence based population needs.

#### **3.2. Outcomes Based Approach**

Whilst the evidence base for selecting outcomes and indicators is largely unclear, the preference for the adoption of an outcomes based approach based on the work of Mark Friedman in his book “Trying Hard is Not Good Enough” is clearly stated<sup>3</sup>. Outcome methodologies is not Housing Rights’ core area of expertise and as such the organisation would normally reserve comment for the Programme for Government

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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> (2016) NI Executive, draft Programme for Government Framework, p.5

<sup>3</sup> (2016) NI Executive, draft Programme for Government Framework, p.8

content rather than the framework. However, given the seismic shift in public policy making represented by the adoption of an outcomes based approach in the draft Programme for Government Framework, Housing Rights views it as appropriate to recall concerns with the Friedman approach.

Inspiring Impact NI's Programme Leader, Mr Aongus O'Keefe, at the Programme for Government consultation event co-hosted by Housing Rights on 5<sup>th</sup> July, highlighted the primary danger in practice of implementing Friedman's outcomes model, in that the overwhelming focus is on quantitative information. Inspiring Impact's response to this consultation underlines this point;

*"Studies of OBA™ in practice illustrate the dangers of relying on a model that prioritises quantities over qualities...There is a growing evidence base from practice research (see references below) that clearly demonstrates how 'chasing the numbers' diverts organisational energy away from understanding the complex dynamics and nature of people served; the quality of their practice; and actual outcomes as experienced by individuals."*<sup>4</sup>

As an organisation whose work evidences the complex relationship between housing, health, criminal justice and other areas, a public policy approach which reduces complex social issues to a 'numbers game' is deeply problematic.

**Without the clear value and evidence base referred to above, the risks associated with measuring outcomes through purely quantitative measures, cannot be underestimated.**

#### **4. Selection of Outcomes**

The draft Framework lists 14 outcomes which are listed below.

1. *We prosper through a strong, competitive, regionally balanced economy*
2. *We live and work sustainably – protecting the environment*
3. *We have a more equal society*
4. *We enjoy long, healthy, active lives*
5. *We are an innovative, creative society, where people can fulfil their potential*
6. *We have more people working in better jobs*
7. *We have a safe community where we respect the law and each other*
8. *We care for others and we help those in need*
9. *We are a shared society that respects diversity*
10. *We are a confident, welcoming, outward-looking society*
11. *We give our children and young people the best start in life*
12. *We have high quality public services*
13. *We have created a place where people want to live and work, to visit and invest*
14. *We connect people and opportunities through our infrastructure*

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<sup>4</sup> (2016)) Inspiring Impact NI, Response to draft Programme for Government Framework consultation, available at: <https://inspiringimpactni.files.wordpress.com/2016/07/iini-full-response-to-pfg-consultation-web-version.pdf>

Whilst all 14 are admirable and non-controversial societal aims, **Housing Rights is concerned about the appropriateness of some of the outcomes selected and in particular, the omission of any outcome relating to housing.**

## 4.1. Absence of a 'housing' outcome

The nature of our work means that Housing Rights knows full well 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. In fact when taken in the round, housing is conspicuous by its absence.

The Programme for Government Team defined an outcome as a *“succinct, high level statement, describing what we are trying to achieve”*<sup>5</sup>. When asked about the absence of a housing outcome, attendees at the Programme for Government consultation event on 5<sup>th</sup> July were informed the view had been taken that housing is an *“enabler”* for many other outcomes rather than a wellbeing factor in its own right. **Housing Rights rejects this categorisation. Good housing is absolutely an end in itself.**

The importance of good housing for human wellbeing is widely recognised. The widely accepted psychological theory put forward by Abraham Maslow in 1943 which outlines the hierarchy of human needs<sup>6</sup>, was also raised by stakeholders at the 5<sup>th</sup> of July consultation event. Maslow's hierarchy of human needs identifies shelter as a basic life need, which without satisfaction, humans cannot go on to have further more aspirational needs met. Housing Rights would concur with the suggestion raised by stakeholders at this event that Maslow's hierarchy of human needs is a good model upon which to devise outcomes which promote wellbeing.

Last year Housing Rights provided direct help which prevented homelessness and improved the housing situation of around 10,000 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.

Our advisors work to ensure that people are able to remain in their homes. Last year almost 800 cases of homelessness were prevented. Critically, such is the impact of housing on people's lives that 9 out of ten of our clients told us that as a result of engaging with our services they had seen a direct improvement in their quality of

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<sup>5</sup> Presentation given by Mr John Bradley, Programme for Government Team at '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.

<sup>6</sup> Maslow, A.H. (1943). "Psychological Review 50 (4) 370–96 - A theory of human motivation". [psychclassics.yorku.ca](http://psychclassics.yorku.ca)

life. In providing our services, Housing Rights witnesses daily the importance of housing as an end in itself in improving wellbeing for all. That housing is one of the top issues raised by constituents when they contact their MLAs for help and advice, reaffirms this.

Good housing also enables the achievement of other outcomes. 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>7</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>8</sup>

**That good housing *also* enables the achievement of other outcomes, such as those relating to health, criminal justice, children and young people etc., is reflective of its significance- it has a dual role.**

#### **4.2. Appropriateness of other outcomes**

If the same rationale of wellbeing factor in and of itself vs 'enabler' is applied to the other outcomes listed in the draft Framework, queries arise as to the appropriateness of some of those listed. For example, it is arguable that both good quality public services and infrastructure are clear enablers rather than ends in and of themselves. Despite this, both are listed as outcomes.

Additionally, the draft outcomes and indicators suggest some confusion in thinking regarding what indicator and outcomes are.

In light of the above, Housing Rights is concerned that the process for deciding on the Programme for Government Framework outcomes is fundamentally flawed. Until this is rectified, with serious thought given to the above, the validity of the entire approach is undermined.

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<sup>7</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>8</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)

### **4.3. Designing a housing outcome**

Together with Council for the Homeless, NIFHA and CIH, Housing Rights carefully drafted the wording for a potential housing outcome which could capture the cross tenure complex issues associated with housing, whilst still retaining the succinct high level description of what the NI Executive should seek to achieve.

This draft wording was then debated in round table discussions at the Programme for Government consultation event co-hosted by the organisations, notes from which are attached as an annex to this response. The inclusion of a housing outcome which included the following words; *“We have good quality, affordable homes for everyone”* was given broad support by those in attendance.

**Housing Rights recommends that the Programme for Government Team and the NI Executive give serious consideration to the adoption of this outcome in the revised Framework.**

## **5. Selection of Indicators and Measures**

The draft Framework lists 42 indicators. An indicator has been defined by the Programme for Government Team as a “specific change we [NI Executive] want to bring about. Taken in the round show the direction of travel”<sup>9</sup>.

Each indicator is listed as relevant to multiple outcomes. For example, the housing specific indicator ‘improve the supply of suitable housing’ is listed under the following six outcomes;

- We enjoy long, health, active lives
- We care for others and we help those in need
- We have high quality public services
- We have created a place where people want to live and work, to visit and invest
- We connect people and opportunities through our infrastructure
- We give our children and young people the best start in life

The NI Executive is therefore identifying the supply of suitable housing with the achievement of each of these outcomes.

### **5.1. Linkage between indicators, measures and outcomes.**

The approach in the draft Framework indicates a preference for one lead measure per indicator. A measure, has been defined as providing “information on whether we are succeeding [in achieving the specific change we want to bring about].” In the case of the housing indicator listed above, the lead measure is the “number of households in housing stress”. Putting aside concerns with the content of the indicator and measure

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<sup>9</sup> Presentation given by Mr John Bradley, Programme for Government Team at ‘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.

selected, **Housing Rights is concerned that the current approach does not adequately integrate outcome, indicator and measure.**

Using the example above, the number of people in housing stress is perceived to be directly related (as the measure by which government will know they are succeeding) to the outcome which relates to health i.e. We live, long healthy lives. The measure in this case actually has little if any correlation to the achievement of the outcome. With the established link between health and housing fitness standards, a separate indicator and measure relating to fitness would be much more appropriate.

## **5.2. Additional indicators required**

There is therefore a compelling argument to suggest that it is imperative that not only should measures and indicators be directly linked, but that this link should be maintained in their designation under one of the high level outcomes. **A practical way for this to be achieved is in the addition of multiple new indicators which are housing specific and which have appropriate measures. These indicators could then be grouped under relevant existing outcomes as well as under the proposed additional ‘housing specific’ outcome.**

Housing Rights notes that the draft Framework includes reference to multiple indicators in relation to for example, education (indicator 11 ‘improve educational outcomes’ and indicator 12 ‘reduce educational inequality’) and economy (indicators 20, 21 and 22 relate to the size, competitiveness and innovation of our economy respectively). **Given the similarly complex and important role of housing in creating wellbeing, it is also appropriate to include multiple housing specific indicators.**

## **5.3. The current housing indicator and measure**

Turning specifically to the appropriateness of the draft indicator and measure discussed above, Housing Rights is disappointed by the narrow focus given to housing as represented in the indicator / measure. The indicator indicates a sole focus on housing supply and the measure indicates a narrow concentration on social housing to the exclusion of other tenures.

**Housing Rights views it as essential that the NI Executive, in the key policy document which sets out its overarching vision for Northern Ireland and its work to improve wellbeing, appropriately recognise that government responsibility is cross tenure. Furthermore there should be acknowledgement that complex housing issues cannot appropriately be reduced to a single focus on supply and are not capable of being appropriately monitored through the measure proposed.**

There was unanimous agreement in roundtable discussions at the consultation event on 5<sup>th</sup> July that both the indicator and the measure suggested are inappropriate.

Housing Rights agrees with the concerns expressed by many attendees that the measure selected “the number of people in housing stress” is inappropriate on multiple grounds.

Firstly, as is pointed out in the draft Framework, the number of people in ‘housing stress’ is a measure derived from the number of people who have been assessed as having 30 points or more under the Common Selection Scheme. The scheme itself is currently under review by the Department for Communities (DfC) with research about other options for measuring housing need having been published for public consultation by the DfC in 2014. Therefore, to design a lead measure based entirely on a system which is currently being reviewed, jeopardises the longevity of the measure’s use.

Secondly, the data collected does not present the full picture of the need for suitable housing. Since the data source for the measure is used administratively in the procedures for the allocation of social housing, the data is not capable of demonstrating the need for housing by those whose housing needs are not captured. The most obvious group of people with housing needs which are not captured in the number in housing stress, are those who live in other housing sectors e.g. the 1 in 5 people in Northern Ireland who now rent from private landlords.

There are however, many other people who do not view social housing as an option for them and so do not register for social housing in their area, particularly in rural areas – this is referred to by the NIHE as ‘latent demand’. Furthermore, in some areas of particularly high demand, such as North and West Belfast, where waiting times for social housing are prohibitive, people do not register their housing need because they are not able to spend lengthy periods on the waiting list for a home.

It is also important to point out that there are other groups who are ineligible to apply for social housing, whose need will not be captured in this data. Non-EU citizens are not usually allowed to apply for social housing unless they have been granted refugee status. Additionally, the rules of the Housing Selection Scheme make provision for people to be disqualified from applying to be on the waiting list (and thus to be counted amongst those in housing stress if awarded 30 or more points) as a consequence of certain specific actions. These actions relate to owing rent, abandoning a property etc.

Finally, Housing Rights has serious reservations about the entirety of housing data for the Programme for Government being based upon an administrative system being used by a social housing provider. Government pressure for improvements in the measure could lead to behavioural changes by those making decisions about the housing applications of vulnerable people in need of social housing. Out of desire for fewer people in housing stress, people in need of housing could face additional barriers and a decreased likelihood of having their housing need realised. In essence, what could happen, would be a notional decrease in those in housing stress indicating a

success at Programme for Government level- whilst on the ground, actual housing need remained unaffected and the well-being of people decreased.

#### **5.4. Proposals for housing indicators and measures**

As outlined above, Housing Rights recommends the adoption of multiple housing specific indicators which have appropriate measures. These indicators could then be grouped under relevant existing outcomes and the proposed additional housing specific outcome.

Housing Rights has given thought to some possible options for these indicators and measures which are summarised below.

##### *Improving housing conditions*

Housing Rights has been engaging with the DfC in an important piece of work relevant to the review of the minimum statutory fitness standards. Standards of housing fitness are measured across tenure, though the highest rates of unfitness are generally found in sectors such as the private rented sector. The preferred option for a new fitness standard is the Housing Health and Safety Rating System (HHSRS) which 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 is already being used in an abbreviated form by the NIHE in the House Condition Survey and Housing Rights has recommended its adoption to the DfC, highlighting in particular the opportunity presented by the adoption of the HHSRS in view of the approach taken in the draft Programme for Government Framework.<sup>10</sup>

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>11</sup>

##### *Reducing housing inequality*

Housing Rights notes the indicator included in the draft Framework which relates to reducing educational inequality and views the inclusion of a similar indicator in relation to housing inequality as appropriate.

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<sup>10</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)

<sup>11</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)

The NI Executive will be aware that in 2015, the Centre for Housing Policy at the University of York, commissioned by the Equality Commission Northern Ireland (ECNI), published research into inequalities in housing and communities in Northern Ireland.<sup>12</sup> The ECNI subsequently developed a draft statement of key inequalities which they observed in relation to the accessibility of housing/ opportunities to secure housing; the adequacy of housing – that housing meets physical, cultural needs and is safe, and; the affordability of housing – the tenure is secure and affordable in the long term.<sup>13</sup>

Housing Rights views the adoption of an indicator relevant to the reduction of housing inequality which is linked to this evidence base as important and necessary. It would also be appropriate for this indicator to be included under other outcomes such as e.g. we have a more equal society.

Housing Rights would be pleased to work with the NI Executive and others, including the Equality Commission to assess suitable measures which could appropriately be linked to an indicator of this nature.

### *Reducing homelessness*

Housing Rights is mindful of the central role played by housing in people's lives. The absence of housing should therefore be afforded appropriate recognition by the NI Executive through the adoption of an indicator which relates to the reduction of homelessness.

Housing Rights is currently working with the DfC, the NIHE, other statutory agencies and practitioners in the development of a revised homelessness strategy. To maximise the success of this indicator, its development should mirror the strategy's development. It may even be appropriate to consider whether any proposals for the revised homelessness strategy should be re-developed in light of the approach taken by the NI Executive in the revised Framework which follows this consultation.

### *Affordability*

The fastest growing area of inquiry from people who contact Housing Rights for advice relates to affordability. 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>12</sup> (2015) Centre for Housing Policy at the University of York, Housing and Communities' Inequalities in Northern Ireland. Available at:

<http://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/HousingInequalities-FullReport.pdf>

<sup>13</sup> (2016) ECNI, Draft Statement on Key Inequalities in Housing and Communities in Northern Ireland, available at: [http://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/Housing-KeyInequalities\\_DraftStatement.pdf](http://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/Housing-KeyInequalities_DraftStatement.pdf)

The Joseph Rowntree Foundation's 2016 report 'Monitoring Poverty and Social Exclusion in Northern Ireland'<sup>14</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.

Affordability was also raised by stakeholders at the 5<sup>th</sup> July consultation event, who felt strongly that housing affordability is a key indicator for wellbeing. Some attendees noted the significance of the omission of an affordability focus, particularly in the context of Welfare Reform. Housing Rights would agree that any Programme for Government agenda which is aimed at improving wellbeing by tackling disadvantage, should give recognition to the serious affordability issues faced by an increasing section of the population. It could be appropriate to monitor affordability in the context of housing costs as a proportion of income.

Housing Rights would be pleased to work closely with the Programme for Government Team, the NI Executive and others to examine how best this could be reflected in a Programme for Government indicator / measure.

Housing Rights acknowledges the suggestion by others, also expressed at the 5<sup>th</sup> July consultation event that it could be appropriate to consider the development of a 'housing index'. Housing Rights notes that other indexes are being developed as appropriate measures elsewhere in the Programme for Government. We would be happy to engage with others to explore this idea.

## **6. Next steps**

In light of the particular significance of this strategic framework, Housing Rights would encourage the NI Executive to ensure that greater efforts are made to involve stakeholders in the further development of the Programme for Government.

Housing Rights is particularly mindful of 'easy to ignore' groups typically excluded from public policy making. Research commissioned by Housing Rights by Dr Jenny Muir and Mary McMahon which identifies how 'easy to ignore' groups, such as could be involved in policy making<sup>15</sup> may be of use in this regard.

In preparing this response, Housing Rights undertook a sample survey of users to our public information website [www.housingadviceni.org](http://www.housingadviceni.org) to determine their views on the Programme for Government outcomes. When asked to choose from a suggested list

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<sup>14</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)

<sup>15</sup> (2015) Muir, J et al, 'Involving Everyone Including 'easy to ignore' groups in housing policy and strategy development in Northern Ireland' accessed at: [http://housingrights.org.uk/sites/default/files/Easy%20to%20Ignore%20Full%20Report%20-%20June%202015\\_0.pdf](http://housingrights.org.uk/sites/default/files/Easy%20to%20Ignore%20Full%20Report%20-%20June%202015_0.pdf)

which mirrored the draft Framework's outcomes (and which also included housing) respondents indicated that good quality, affordable homes would be a top 5 priority for their family.

Housing Rights would be pleased to assist the NI Executive in facilitating engagement with people accessing our services as the Programme for Government is developed further.

Housing Rights looks forward to further involvement in the further development of the draft Programme for Government Framework and action plans and would be happy to discuss further any of the points raised in this response.

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

# Making housing matter

## A Programme for Government consultation event

Tuesday 5<sup>th</sup> July 2016

### Summary of Roundtable discussions

#### 1. What do you think of the outcomes based approach and its use in the draft Programme for Government?

##### Broad welcome for focus on outcomes

[Table 1] All broadly supportive of the approach .Liked wider perspective.

[Table 2] Outcomes based approach is/could be a better way forward, with caveats

[Table 3] Supportive of the broad ethos of the framework, but disappointed with the essential lack of housing. This is integral to several other outcomes, and as well as this, deserves an outcome of its own.

[Table 4] Aspiration to create a better society welcome

[Table 4] Generally welcomed move away from “departmental lines”

[Table 4] Opportunity to promote cross departmental and cross sectoral working.

[Table 5] Welcome emphasis on outcomes. Would predict that most people would agree that outcomes are all good things to aim for. It is good to get away from box ticking.

##### Risks identified

##### *Too aspirational*

[Table 2] How does this filter down? It’s ambitious so how do you make sure the vision matches the delivery? It’s a great idea but it needs to be more than a top level approach and there needs to be a whole system approach.

[Table 2] The framework is aspirational, but there has to be an element of deliverability in the outcomes and they might be just a little bit too top level.

[Table 2] A lot of the outcomes are aspirational and need to be hardened up.

##### *Unclear*

[Table 5] The indicators are not clear. For example, ‘suitable’ housing, ‘preventable’ deaths – how are these defined? Who decides what is suitable/preventable?

[Table 1] Is there a clear indicator for success or failure

## *Accountability*

[Table 3] It was felt that there was a danger of the focus of the framework, in practice, bypassing “outcomes” and “indicators” and going straight down to “measures” level. Ultimately the Senior Responsible Officers will be held to account by these measures, not higher-level indicators or outcomes.

[Table 5] Would like more information on the Senior Responsible Officers. Who are these people? Do they work outside of departments or will they still have responsibility to a department?

[Table 5] There is less to measure so concerned that there would be less accountability. Would like to see more specific actions and a plan to achieve this.

## *Choosing the right emphasis is critical*

[Table 4] High stakes – critical outcomes chosen are right ones and not driven by personal or political agendas. Effective communication between decision makers & community (population) is essential

[Table 4] Over concentration on numeric targets can fail to capture complexities of people’s lives – qualitative data also important.

[Table 4] Emphasised values need to underpin OBA otherwise could drive poor practice at implementation.

[Table 4] Danger that outcomes etc. driven by data which is available, there needs to be a recognition that the best data may not be available- identification of a data development agenda.

## Practical issues

[Table 1] Consultation process not comprehensive enough

[Table 2] The outcomes based approach works well if everyone understands what that means.

[Table 2] One threat is that there are no real targets, and will a ‘turning the curve’ approach suffice? If there is a small increase in performance, will this be taken to be success?

## *Cross Departmental working*

[Table 2] It’s very laudable in theory and the strong emphasis on collaboration is welcome. However cross departmental working within a department is difficult enough

without looking across departments.

[Table 3] Given the emphasis on cross-Departmental working in the approach of the Framework, it is surprising that there is no specific outcome *on* joined-up government/cross-Departmental working specifically.

[Table 1] In practice can it do what it is set up to do? Are we measuring the right things in the right way.

[Table 5] “Are we jumping the gun?” Not convinced that the structures in government are capable of delivering this model. Not concerned regarding the will to collaborate but are there the resources available to work collaboratively? Will there be cross department funding?

### *Resources*

[Table 4] Documents should include a fiscal philosophy.

[Table 2] Framework has to be taken in the context of a finite budget, how will outcomes be delivered if the budget for a relevant action is cut?

### *Impact of/on other developments*

[Table 5] The PfG doesn't exist in isolation. How will existing and pending strategies be linked to this PfG? Will all future strategies be linked under the outcomes framework, how will they 'speak' to it and other strategies? For example, should the Housing Executive stop working on their Homelessness Strategy until the PfG is fixed?

[Table 5] With 'Brexit' do we need to revisit the entire process of developing a PFG?

### *Is government equipped to work this way successfully?*

[Table 1] Last programme didn't deliver – will this?

[Table 4] Structures and culture of public services may not easily support this model in practice – would require significant change in working practices within government and between sectors.

[Table 4] Danger that outcomes etc. driven by data which is available, there needs to be a recognition that the best data may not be available- identification of a data development agenda

[Table 5] Government indicating that action plans will be developed which will be flexible – suggested that if the plan was not working, the Executive could change the plan to make it a better fit. This does not work in practice and is not our experience of how government work. You cannot change a plan midstream.

## **2. Should the Programme for Government have a housing outcome?**

Need for housing outcome

[Table 1] Yes there should be a housing outcome. The housing outcome needs to be clearly articulated with a statement of intent which is clear

[Table 2] Consensus, bar one, that housing should be an outcome – person who disagreed thought housing was more of an enabler than an outcome, including an economic driver, and there was a risk that housing as an outcome risks boxing it into a stand-alone role. While it's possible for housing to be an enabler as well as an outcome, not all outcomes are about specific outcomes and it can be argued some are enablers e.g. references to jobs and employment.

[Table 3] There was broad agreement that there should be a specific outcome on “homes” (as distinct from “houses”), as this is a starting point for delivery of so many broader outcomes.

[Table 4] Yes

- Fundamental human need (shelter)
- Much more than an enabler - end not means.
- Decent housing comes first & also provides central platform to achieve many of other outcomes.

[Table 5] Unanimously, yes. Housing is a basic need. Shelter and Maslow's Hierarchy of social needs. People cannot move on to further aspirational needs without their basic needs being met. Identifying outcomes based on this hierarchy would be more successful approach.

[Table 2] One person felt that housing as an indicator almost felt like an afterthought. Another thought that housing as an outcome will help housing to not be treated as a political football. Housing, private rented, social housing and sustainability of existing stock are such vital areas that housing must be an outcome. Housing is a human right. Housing should be added to shared space and economic driver objectives.

[Table 3] The group felt that if there is no specific PFG housing outcome, there would be little scope or likelihood of any cross-Departmental working on the issue. Also suggestions that the relative absence of housing could have trickle-down impacts on funding levels for housing and the housing sector more generally.

[Table 4] Important role of housing as a contributor to other outcomes is also recognised – would not want to lose this.

[Table 3] It was highlighted that good housing has positive “multiplier effects”, in both individual and broader senses.

*What should a housing outcome look like?*

[Table 4] Group like suggested wording “ We have good quality affordable homes for everyone”

[Table 2] Housing outcome should be “we have good quality, affordable homes for

everyone in sustainable communities”

[Table 5] Liked suggested wording of “We have good quality affordable homes for everyone”. Cautioned affordable needs to be carefully defined – related to income. A housing outcome should also include the words:

- Secure
- Suitable
- Sustainable

Additional thoughts on outcomes:

[Table 4] Why is “Quality of Public Services” an outcome - is this not a means to an end rather than a “desired state”?

[Table 4] What about an outcome “caring for people in crisis”?

### **3. What do you think of the proposed housing indicator /measure?**

Inadequate & unsuitable

[Table 3] The group strongly felt that the existing indicator and measure were not adequate.

[Table 4] Totally inadequate

[Table 5] Disappointed. Too narrow. Restrictive.

[Table 2] No one felt reducing housing stress was the best measure.

[Table 5] Sounds like they have developed this without talking to people working in the sector.

*Needs to be improved*

[Table 2] People felt the housing indicator either wasn’t right or there was a need for additional housing indicators. ‘Suitable’ may be well meaning but the problems could be defined, still in simple terms.

[Table 4] Suitable” – very subjective – would need additional clarification on how this is to be defined/measured (current measure appears only to relate to public housing )

[Table 3] There is plenty of other data available to supplement simply “housing stress” figures.

[Table 3] The measure does not measure, in any sense, the supply of “suitable” housing referred to in the indicator.

[Table 1] Needs to be stronger and more challenging. Only building half of what we need.

## Data concerns

[Table 3] Housing Selection Scheme itself is likely to change over the next Assembly mandate; within this, the definition of “housing stress” is therefore also likely to change.

[Table 3] Another member pointed out that “latent demand” – whereby households in housing stress do not formally apply for social housing, as they don’t see any point as there is little/no supply in their area – is a major concern in this regard.

[Table 5] Danger that people will play the numbers game, intentionally or unintentionally, e.g. may be tempted/pressured to not accept clients in housing stress.

[Table 5] Using such narrow, qualitative data is risky. Numbers can be manipulated.

[Table 5] There is a need for accompanying qualitative data.

## Other concerns

[Table 5] Measure proposed has no relevance to some of the outcomes it is listed under i.e. how will the number of people in housing stress show us anything about government progress under outcome re long healthy lives. In this example, a measure relating to fitness would be much more appropriate.

[Table 3] The group noted that this indicator & measure is completely ignorant of the ongoing TBUC strategy and its aspirations.

[Table 3] The group noted that this indicator & measure doesn’t align with the pre-Election manifestos of the relevant parties.

[Table 4] Need to have cross tenure indicators – the programme should not just be about social housing e.g. fitness standards

[Table 2] A better, new measure should be used that covers more types and tenures of homes – reference to reliance on existing data.

[Table 5] Why are those in the private rented sector not represented when it represents such a large proportion of people’s housing situations in Northern Ireland?

[Table 1] Need a basket of measures – affordability, quality.

[Table 5] Then work that organisations represented already do, demonstrates outcomes. Propose that housing organisations could provide more helpful data that moves away from a restrictive numbers game and reflects the current climate more accurately.

Propose that there should be short, medium and long term measures to prevent the

recycling of clients.

[Table 1] Housing is only one of 42 indicators – given the complexity and diversity of the issues, should be at least 3 indicators.

[Table 4] Services for people in crisis not covered

[Table 1] Supporting People – connects out of the SILOS

[Table 4] Focus only on quantity & “supply” – “quality” of homes also has to be captured.- must include basic issues of safety/security

[Table 4] Inclusion of additional indicators would also permit additional housing related measures to be devised

[Table 5] We are an aging population. This is not addressed in the PFG. Meeting older people’s housing needs is vitally important. There should be a push for ‘Homes for Life’.

[Table 1] Adapting houses to the changing needs as population get older

#### **4. What other indicators/measures would be suitable for housing?**

##### **Homelessness**

[Table 3] The group expressed concern at the absence of anything referring to the reduction and/or prevention of homelessness. This should be captured in any proposed indicator/ measure.

[Table 3] Eradication of homelessness

[Table 4] Rates of Homelessness

[Table 2] Something around homelessness should be an indicator – reduction of FDAs should be the measure

[Table 1] Homelessness isn’t mentioned or supported housing. Reducing Homelessness – statistical basis already exists

[Table 5] Homelessness is our society’s “social cancer”. We should be looking for a cure, not merely to reduce the need. Emphasis should therefore be on ending homelessness, not merely reducing it.

[Table 4] Tenancy sustainment

##### ***Fitness***

[Table 3] Something regarding the fitness and sustainability of homes

[Table 4] Fitness standards?

[Table 5] Housing fitness standards – currently being changed and one option is to link housing and health in the measurement of fitness – could work well for PFG.

[Table 1] Quality of housing measure – across all tenures

[Table 1] Percentage of housing – new fitness standard.

*Increasing supply*

[Table 3] Supply targets (for social, PRS *and* private housing)

[Table 4] Number of new homes (across all sectors)

[Table 4] Reduction in empty homes

[Table 2] Meeting the ‘housing growth’ indicators could be a good one for supply.

[Table 1] Improve suitable housing – focus on greatest need

*Affordability*

[Table 4] Affordability ratios (income/housing costs)

[Table 5] Affordability – Welfare Reform is going to have a huge impact, where is it in all this?

[Table 1] Affordability – private, co-ownership, social

*Other comments*

[Table 3] Security of tenure (however this is to be defined)

[Table 3] Shared housing targets

[Table 2] Tenant and community element should be an indicator – ‘better involved, well informed, engaged communities’ or similar could be the measure. Point that measures can be softer, less tangible things that still lead to societal outcomes.

[Table 2] Other potential indicators could cover sustainability and affordability, with a caveat that they could be too narrow e.g. tenancy sustainment may be too narrow, but something about access and support, and quality that crosses all tenures could be covered, as could security for those who want it. Something around “safe, secure, sustainable housing solutions.” ‘Solutions’ is embedded in community and finding the best option for the individual.

[Table 4] What about considering a “Housing Index”???

[Table 5] Some of the other measures have not yet been developed, is the decision to choose measures based upon what is readily available or what is appropriate?

**Organisations in attendance include:**

Barnardos

Belfast Central Mission - Newtownards Office
Chartered Valuation & General Practice Surveyor
Choice Housing
CIH
Co-Ownership Housing
Council for the Homeless
Department for Communities
Department for Communities
Disability Action
East Belfast Mission
Executive Office
Extern
Glass & Glazing Federation
Green Party
Housing Rights
Housing Rights Private Tenants Forum
Inspiring Impact
MACS Supporting Children & Young People
Newry, Mourne and Down District Council
NIFHA
NIHE
Northern Ireland Institute for the Disabled
Rea Estates
SDLP
Shelter NI
Simon Community NI
Sinn Fein
Stratagem
Supporting Communities
Triangle Housing
Triangle Housing Floating Support
Voice of Young People in Care