# Contents

- Ministerial Foreword 4
- About this document 6
- Background 6
- Consultation process 7
- Analysis and Collation of Respondent Views 9
- Methodology 10
- Proposal Response Rate 11
- Support for Proposals 12
- Next Steps 13
- Proposals, Departmental Response and Next Steps 15
- Annex A - Consultation process 99
- Annex B - Full list of respondents 101
- Annex C - Unclear responses – broken down by proposal 102
- Annex D - Likely Timescales for Implementation Phases 104
Ministerial Foreword

You can’t get more basic than the right to housing. Everyone has the right to a home adequate for their health and wellbeing. My colleague, Minister Ni Chuilín, recently set out the significant challenges facing our housing system. I am committed to bringing forward measures which will deliver for those in need and deliver on the vision that every household has access to a good quality, affordable and sustainable home that is appropriate for its needs. Social housing has a vital role to play in realising that vision. I want to revitalise social housing and make it work better for those who need it most.

The targets for new social homes are far too low, so we must increase supply in order to reduce demand. I want to tackle housing stress by building significantly more social homes and ensuring that the homes we already have are sustained for future generations. I will bring forward proposals on the investment challenge facing the Housing Executive, and I will protect the social stock by consulting soon on the future of the Housing Executive’s House Sales scheme. I am determined to bring forward legislation to improve the safety, security and quality of the private rented sector and expand rental options to provide good quality, affordable homes. I will also develop a housing supply strategy. This will have mixed tenure at its heart and ensure stable, secure communities for everyone. I am increasingly concerned about those who cannot get a family home, such as asylum seekers and refugees. Whilst this is not all within the remit of my Department to resolve, I will always stand up for refugees’ and asylum seekers’ rights to good quality housing.

There is a lot to do. I am pleased to present a series of actions that will be taken forward following the Review of Social Housing Allocations. The consultation for this review was completed some time ago and progress has been impacted by Covid-19, but the issues raised have been carefully considered.

The Housing Selection Scheme is highly valued, but it is in need of an upgrade. My Department will now work with the Housing Executive to enable their implementation of 18 of the 20 proposals which were consulted on in 2017. Further work will be carried out and alternatives considered for two proposals which will not progress. These are the proposals to remove intimidation points and interim accommodation points. Both sets of points are still needed today to meet the specific needs of the most vulnerable in our
society, including victims of violence or abuse, and those who find themselves in temporary accommodation for a significant length of time. There must be robust verification of intimidation points: I want to make changes that will prevent any manipulation of the system for awarding these points.

I wish to thank everyone who took the time to respond to the public consultation in 2017 – from key stakeholders in the housing sectors to members of the public who have experience of waiting for a social home and shared their own personal feelings and reflections on how we could do better. This document summarises the main themes raised by respondents and these will be taken into account as implementation progresses.

Deirdre Hargey MLA
Minister for Communities
About this document

This document presents the findings from the consultation on A Fundamental Review of Social Housing Allocations.

Background

The Fundamental Review of Social Housing Allocations was launched in 2013. Research was commissioned from the Universities of Ulster and Cambridge to provide an independent analysis of the current system, best practice approaches and make recommendations for change. The Department sought public views on these reports and series of proposals for change. A number of other pieces of work also contributed to the Review and development of the final proposals:

• the Housing Executive consulting and suggesting changes to the Department in 2011;

• the commissioning of research to model the impact of a number of the proposals; and

• a private members’ motion in the Assembly in 2016 which called for a review of the Housing Selection Scheme.

In September 2017, the Department embarked on a public consultation on 20 proposals with a view to progressing the review and to bring about long-awaited amendments to the Housing Selection Scheme, which has remained relatively unchanged since its introduction in 2000.

1 Full details of events and other communications provided in Annex A.
Consultation process

The consultation was publicly launched on 28 September and closed on 21 December 2017.

Alongside the main consultation document, a range of other documents were published on the Department for Communities website, including the following:

- A review of social housing allocations policy screening (Section 75) - this included separate screening forms completed for waiting list applicants with either intimidation or interim accommodation points
- Draft Equality Impact Assessment (EQIA) on the Fundamental Review of Social Housing Allocations
- Rural Needs Impact Assessment
- Social Inclusion Impact Assessment
- Analysis of the Social Housing Waiting List
- Examples of Social Housing Allocations in Great Britain

The Department took the following actions to ensure as many stakeholders and members of the public as possible were able to participate in the consultation:

Social media and online activity

- 5500 plus hits on the consultation webpage
- Comprehensive social media plan
- Over 60 tweets

Stakeholder engagement

- Assembly All Party Group on Housing
- Five public events across Northern Ireland, attended by over 160 people
- 13 presentations to smaller stakeholder groups, attended by over 230 people
- Mailshot to all applicants on the waiting list (over 51,000 households)
Publications

- Newspaper advertisements
- Leaflets / Posters / Hard copies of the consultation, the EQIA and Easy Read (made available via Housing Executive/Housing Association local offices, libraries, local council offices etc.)

Accessibility

- Easy Read version
- Large print and translated copies
- Electronic note taker

Consultation Responses

A total of 185 responses were received from a wide range of stakeholders, including: voluntary organisations; political parties; elected representatives; local government and members of the public.

Responses to the consultation were collected via a range of methods:

- Survey Monkey
- Hard copy consultation booklet
- Easy Read hard copy consultation booklet
- Easy Read online booklet
- Written submission
- Oral feedback at consultation events

The majority of responses were received via written submission, varying in length from a few sentences to 50 pages.

As part of this review, the Department carried out a draft Equality Impact Assessment (EQIA). This was published separately for consultation. The analysis of responses relating to the EQIA and the finalised version of the EQIA has been published alongside this document: https://www.communities-ni.gov.uk/consultations/fundamental-review-social-housing-allocations
Analysis and Collation of Respondent Views

A comprehensive and extensive exercise took place to review each response submission. Many stakeholders took this opportunity to also provide feedback not only on the proposals but the Housing Selection Scheme and the allocations process in general. Various themes were identified and captured per proposal. These have been presented alongside the levels of support for each proposal.

In addition to comments on the proposals, respondents provided feedback on the consultation process and suggestions on how it could have been improved.

To assist with analysis, respondents were grouped into categories as follows:

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organisation unknown</td>
<td>organisation category selected but name not provided</td>
</tr>
<tr>
<td>Member of the public</td>
<td>this includes all responses from individuals across all formats</td>
</tr>
<tr>
<td>Did not specify</td>
<td>those who specified ‘Other’ in their online Survey Monkey response</td>
</tr>
<tr>
<td>NI social landlord</td>
<td>includes the Housing Executive and Housing Associations</td>
</tr>
<tr>
<td>Housing professional</td>
<td>organisations with a specific focus on housing, e.g. Housing Rights</td>
</tr>
<tr>
<td>Voluntary/Community/Advocacy</td>
<td>includes a range of bodies such as Shelter NI</td>
</tr>
<tr>
<td>Statutory body</td>
<td>includes a range of bodies such as the Equality Commission</td>
</tr>
</tbody>
</table>
Consultation Outcome Report - A Fundamental Review of Social Housing Allocations

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Political Representative</td>
<td>includes political parties and the Housing Council</td>
</tr>
<tr>
<td>Council/local government</td>
<td>includes Councils and NI Local Government Association</td>
</tr>
<tr>
<td>Housing Forum</td>
<td>includes local housing groups and tenants’ forums</td>
</tr>
<tr>
<td>Housing student</td>
<td></td>
</tr>
</tbody>
</table>

These categories have been further summarised in the bar charts used within the reports. They were grouped as follows:

- Organisation – Organisation unknown; NI social landlord; housing professional; voluntary/community/advocacy; statutory body; political representative; council/local government; and housing forum
- Member of the public – members of the public including housing students

A full list of respondents is included at Annex B.

### Methodology

#### Response Rates

Not all respondents provided a response to all 20 proposals. Each proposal has been presented within this document with a response rate, i.e. a percentage of those who responded to each proposal.

For example, out of a total of 185 responses 125 responded to Proposal 1 (a response rate of 68%). These figures include all respondents who agreed, disagreed, didn’t mind or who provided a response that was unclear.

#### Preferences

Respondents were asked to indicate whether they “agree”, “disagree” or “don’t mind” each of the proposals.

Many respondents (95 in total) provided written responses and did not always clearly indicate one of the requested preferences. In these cases a consensus view was sought by the consultation team. To do this, each response was examined with a view to establishing whether the respondent had expressed a preference.
Where this was not the case, the response was coded as “unclear”. A list of the number of unclear responses per proposal is noted in Annex C.

Throughout the report, information is provided for each proposal in terms of the number of respondents who commented. The charts presented for each proposal indicating levels of agreement are based only on those respondents who clearly provided an indication of their support or otherwise for each proposal. These do not include those whose responses were coded as “unclear”.

Some figures in the pie and bar charts are rounded and therefore not all add up to 100.

Proposal Response Rate

Good levels of response were seen across all 20 proposals. It is notable that some of the more topical proposals received the highest response rates, including Proposal 7 – removal of intimidation points – and Proposal 4 – the Housing Executive can meet its duty to homeless applicants on a tenure-neutral basis, provided that the accommodation meets certain conditions.
Overall there was support for each of the 20 proposals. Respondents expressed the highest levels of support for Proposal 1 – independent, tenure-neutral housing advice service – and Proposal 20 – specialised properties should be allocated by a separate process outside the Selection Scheme. The lowest support can be seen for Proposal 9 – removal of interim accommodation points and Proposal 15 - reduction in offers from 3 to 2.
Next Steps

Given the volume of responses to this consultation, it is clear that the allocations scheme, and the proposals for change, are of high interest and importance to many in our society.

The Housing Executive will now seek to implement these proposals. It has given preliminary consideration to the work involved in introducing the proposals, taking into account a wide range of impacts and dependencies, e.g. changes required to IT systems, development of staff guidance and the impacts that some proposals may have on others. This has been used to produce a preliminary implementation plan. Officials will work with the Housing Executive to draw up more definitive plans and costs in due course.

The strength of feeling surrounding issues raised by respondents to this consultation (both in writing and at the public events) is acknowledged and will be taken on board, where appropriate, during implementation of the proposals. The Housing Executive will consider the issues raised by respondents - these are clearly laid out per proposal within this document - and will take forward further targeted consultation with stakeholders throughout implementation.

The Department would welcome the establishment of a stakeholder advisory group to help the Housing Executive to achieve the best possible outcomes.

The Housing Executive has been asked to consider and present for approval, implementation plans for 18 of the 20 proposals, to be implemented on a phased basis. These will be presented to the Department for approval, under the relevant legislation, in due course. Plans will be taken forward subject to budget availability.

The proposals to remove intimidation points (Proposal 7) and interim accommodation points (Proposal 9) will not proceed as per the 2017 consultation. Instead options will be explored for alternative proposals. For intimidation points this will include tighter verification and consideration how to include other households facing trauma or violence. For interim accommodation points, this will involve the need to consider the additional stress associated with being housed in temporary accommodation, in whatever form that takes. These two new proposals will require significant research; therefore implementation is likely to be in Phase 3.
The Housing Executive has set out anticipated timescales for implementation:

- **Short term (Phase 1)** is in the region of nine to twelve months from project commencement;
- **Medium term (Phase 2)** is in the region of 18+ months from project commencement; and
- **Long term (Phase 3)** is in the region of 24+ months from project commencement.

Annex D provides an overview of the likely implementation phases and timescales.
Proposals, Departmental Response and Next Steps
Proposal 1 Analysis

What we asked:

An independent, tenure-neutral housing advice service for Northern Ireland

People should receive high-quality, tailored, tenure-neutral advice in a way which respects their dignity and confidentiality. Do you agree?

Out of a total of 185 responses, 125 (68%) responded to this proposal

94% Support

Of those who indicated a position on this proposal, nine out of ten (94%) agreed with the proposal

Breakdown of respondents who provided a position, by respondent type (%)

Support for this proposal was greater amongst members of the public, with 97% in agreement, compared to 92% of organisations

Note: Due to rounding these totals may not always equal 100
Summary of respondents’ views

There was overwhelming support for the provision of independent, tenure-neutral housing advice with more than nine out of ten respondents supporting this proposal. Feedback indicated that such a service should increase options and solutions for applicants and that the provision of quality, tailored advice will enable applicants to make informed choices, resulting in greater tenancy sustainment. The importance of independence and tenure-neutral advice was noted by respondents. Some respondents referenced the Housing Executive as best placed to provide the service via its Housing Solutions Team, whilst other respondents expressed concerns around the Housing Executive’s dual role in terms of statutory homeless obligations whilst also acting as a social landlord and that this may mean that advice may not always be considered independent or tenure-neutral. Conversely, some respondents felt that the Housing Executive should not offer tenure-neutral advice, raising concerns that vulnerable people may end up in the Private Rented Sector, away from the support of the Housing Executive. The important role that alternative providers play in the advice sector was also highlighted; the advocacy role in particular.

…support the need for...a service tailored around the needs of the applicant, an emphasis should be placed on providing all applicants with options which enable them to make informed choices for their current and future housing needs.

We believe that it is essential that this service be truly independent and to be so would probably need to be provided by an organisation independent of any housing providers.

The advice service could encompass a number of bodies, that can work together to ensure that comprehensive independent tenure-neutral housing advice is available.

Such a service needs to ensure that it can provide a range of assistance, advice, advocacy and representation to the public.
Themes raised by respondents

- The service should increase options and solutions for applicants
- The importance of independence
- The importance of tenure-neutral advice
- Alternative providers have an important role to play – advocacy role in particular

The service should increase options and solutions for applicants. Respondents indicated that a tailored advice service will enable applicants to make more informed choices having fully considered the realistic options presented to them. The advice should take into consideration the needs and aspirations of individuals and their families. Choosing the best available housing or support solution should lead to greater tenancy sustainment.

Feedback from respondents

‘[We] agree that the provision of an advice service offering applicants the opportunity to consider all the potential housing options open to them, including those options outside social housing will benefit applicants. The more holistic approach will inevitably benefit those with particular needs and also enable those seeking accommodation to access advice on all possible tenures.’

‘With demand exceeding supply for social housing in Northern Ireland it is important that from the outset, all customers are given advice on all housing options available for them furthermore enabling them to make informed decisions on which housing tenure is most realistic.’

The importance of independence and impartiality was considered by respondents to be key in the provision of housing advice that truly meets the needs of the person seeking it. The service should provide up-to-date, accurate information that will enable applicants to make informed choices. Some respondents suggested that in order to be truly independent the service should be independent of housing providers, while others considered housing providers best placed to offer this service.
Feedback from respondents

‘We believe that in order for an individual to make informed housing choices, they should receive independent and specialised housing advice. It is also important that any independent advice service is seen as a truly independent service that can hold housing providers accountable for their decision making without any conditions.’

‘...recognizes the value of the housing solutions approach adopted by the Housing Executive in Belfast; and believe that the Housing Executive is currently, and will in all likelihood remain, best placed to provide that service.’

Respondents indicated the importance of tenure-neutral advice – people should be able to access high quality advice which is personalised to the needs of the household. Others felt that care should be taken when advising customers of alternatives when they have specifically approached social housing providers for accommodation. It was also noted that vulnerable people should not feel obliged to accept a property in the private rental sector, away from the support currently provided by the Housing Executive.

Feedback from respondents

‘It is important that any housing advice service for the province is tenure neutral and has a thorough understanding of the nature and routes to the various tenures in Northern Ireland.’

‘I am not too sure that a tenure-neutral approach fits all. I would be concerned that vulnerable people might be pushed into the PRS.’

• Alternative providers have an important role to play, providing an advocacy role in particular. Respondents acknowledged the importance of existing advice and advocacy providers. It was proposed that existing bodies could work together to ensure a comprehensive service, ensuring there are no gaps in service provision. Some suggested that advice, or levels of advice, could be delivered by a range of providers. However, the advice must be accurate and the approach consistent with a quality assured model adopted by all.
Feedback from respondents

‘We believe that there is merit in valuing a range of advice providers, not one single organisation, who could commit to a standardised level of service. The advice could be delivered by agencies with a proven track record, expertise, and specialist knowledge with provision for expansion of tenure neutral advice throughout the province.’

‘A service provided by a single organisation could offer a one stop shop for a simple and straightforward experience. Alternatively a service provided by a number of organisations could offer additional capacity and maximise access. There are benefits to both approaches – the focus should be on customer experience and a standardised level of service.’

Departmental response and next steps

This proposal will proceed as per the consultation.

Early advice and support, which is open to everyone who needs housing advice and not solely existing social housing tenants, is key in preventing homelessness and increasing tenancy sustainment. This advice must be holistic and person-centred allowing customers to understand their situation, explore all available options and ultimately make informed decisions around the best options for their specific situation: options for both their immediate and permanent housing needs. The Housing Executive is best placed to provide the advice service using its existing office network and strong links within communities via its already established Housing Solutions and Support Service.

An advice service will be most effective where the stock is available to follow through on the advice provided. However, there is currently a lack of social homes to meet demand. The Department is committed to increasing the stock of social homes; which often represents the best option for many people who approach the Housing Solutions Service. Given the current supply situation whereby need outstrips the available supply of social homes, it is vital that an advice service explores alternative solutions to prevent someone reaching the point of homelessness: this may include providing advice and support to help those who can stay in their homes to retain their home, whether that be in the private or social sector.

The Housing Executive will build on the service already offered via the Housing Solutions Service by actively promoting the Housing Solutions and Support approach as a front line holistic advice service; not just to social applicants and tenants but to all types of household tenures who are in need. It will also initiate discussions with other advice providers to explore complementary activities and to develop protocols as required to enable closer working with other providers and build on existing tailored advice and support.

Preliminary consideration of the work involved with implementation (subject to approvals, budget and resourcing) suggest that this proposal may be taken forward in the short term (in the region of 9–12 months from project commencement).
Proposals 2 & 3 Analysis

Proposal 2

What we asked:

An applicant who has been involved in unacceptable behaviour should not be eligible for social housing or Full Duty homelessness status unless there is reason to believe – at the time the application is considered – that the unacceptable behaviour is likely to cease.

There should be a focus on good housing management, sustainable tenancies and a deterrent against serious anti-social behaviour.

Do you agree?

Out of a total of 185 responses, 129 (70%) responded to this proposal

Response Rate 70%

74% Support

Of those who indicated a preference, almost three out of four (74%) agreed with the proposal

Breakdown of respondents who provided a position, by respondent type (%)

Support for this proposal was much greater amongst members of the public with 89% in agreement in contrast to 51% of organisations

Note: Due to rounding these totals may not always equal 100
Proposals 2 & 3 Analysis

Proposal 3
What we asked:

The Housing Executive may treat a person as ineligible for Full Duty homelessness status on the basis of their unacceptable behaviour at any time before allocating that person a social home.

This proposal should also ensure good housing management and aim to reduce nuisance to tenants; striking a better balance between excluding people from the waiting list and prioritising vulnerable groups. Do you agree?

Out of a total of 185 responses, 121 (65%) responded to this proposal

Response Rate 65%

75% Support

Of those who indicated a preference, three out of four (75%) agreed with the proposal

Breakdown of respondents who provided a position, by respondent type (%)

Support for this proposal was much greater amongst members of the public with 84% in agreement in contrast to 60% of organisations

Note: Due to rounding these totals may not always equal 100
Summary of respondents’ views

In general, respondents considered and commented on Proposals 2 and 3 together. Feedback has therefore been analysed and presented for both proposals combined below.

There was strong support for both these proposals regarding treating applicants as ineligible for social housing and for Full Duty homelessness status where their behaviour is unacceptable, with around three out of four respondents noting their support for each proposal. Comments made by respondents stated that there was a need for clear guidance and a consistent approach in making applicants ineligible, including a clear definition of unacceptable behaviour. Others highlighted that partnership working and information sharing was key to fully addressing unacceptable behaviour. Respondents emphasised that those with vulnerabilities must be supported, and that the root causes of unacceptable behaviour are examined and addressed holistically. Some respondents held a perception that persistent unacceptable behaviour is not tackled, and noted that positive behaviour should be acknowledged.

Some individuals may be involved in anti-social behaviour due to, for example, addiction to drugs and alcohol and/or mental health problems and it was acknowledged that these people need help and structured support from the relevant services...

...further guidance is needed as to what constitutes Anti-Social Behaviour in relation to this proposal; the period of time over which the period of unacceptable behaviour will be considered and the threshold applied regarding eligibility.

A more joined up approach is required between various agencies in relation to “bad behaviour” to delve deeper into why this is the case. For someone who is in difficulties not to have access to the scheme will in the long term have a negative impact.

Who is adequately skilled and experienced to make such a decision? What level of competency is needed? What checks and measures would be in place to ensure that decisions are made in an objective and consistent manner...?
Themes raised by respondents

- Importance of **clear guidance, transparent procedures** and a **consistent approach**; decision-makers must have the necessary skills and understanding of relevant legislation
- Greater **partnership working** and **information sharing**
- Ensure **those with vulnerabilities are supported** and take into account the root causes of unacceptable behaviour
- Perception within some communities that persistent unacceptable behaviour is not dealt with

- A number of respondents emphasised the importance of **clear guidance, transparent procedures** and a **consistent approach**. Respondents stated that there should be a clear definition of unacceptable behaviour to enable, as much as possible, consistent interpretation by decision makers or applicants. Any assessments carried out should be set out clearly in an audit trail, and applicants should be kept informed and be made aware of the implications of anti-social behaviour. Some respondents highlighted that decision makers should be equipped with the appropriate skills and understanding of relevant legislation to implement these proposals.

Feedback from respondents

‘...agrees with proposals two and three on the basis that they would be implemented with clear guidelines for decision makers and criteria which an applicant would have to meet to satisfy the decision maker that their conduct will improve.’

‘Issues which would need addressed include:- who investigates these instances; who makes the final judgement or adjudication; who delivers that decision to the tenant; and what protections or training would be given to staff having to undertake that role.’

- Respondents emphasised that greater **partnership working and information sharing** were required to effectively implement these proposals. The links between PSNI and social landlords to share information appropriately were highlighted. Respondents also stated that close interagency working, including at a local level, should continue to identify incidents and the likelihood of recurrence, and that strong ‘wraparound’ support should be put in place via a range of agencies
Feedback from respondents

‘There will also be a need for very effective information sharing protocols between organisations to be established in order for this proposal to be properly implemented.’

‘Participants advised on the need for statutory partners to liaise effectively with community structures...’

A large proportion of respondents felt that those with vulnerabilities required support rather than outright exclusion from access to social housing and Full Duty homelessness (FDA) status. Consideration should be given to supporting efforts to tackle the root causes of unacceptable behaviour, including mental health issues and addiction. Respondents highlighted the links between being in housing stress and unacceptable behaviour, and the potential to endanger someone already at risk by making them ineligible. Concerns were raised around what happens to people who are made ineligible; there is a perception that being made ineligible was a form of punishment.

Feedback from respondents

‘...encourage that behaviours linked to mental health problems such as addictions are dealt with appropriately and that support is sought from the relevant statutory bodies to address the underlying reasons/cause of what NIHE deems to be ‘unacceptable behaviour.’

‘We do agree that there should be some consequences of anti-social behaviour but would have questions about where they would go if they do not have their FDA. Potentially resulting in higher levels of homelessness.’

Some respondents stated there was a perception within some communities that persistent unacceptable behaviour is not dealt with, and that positive behaviour should be recognised and acknowledged. Respondents felt that those whose behaviour was unacceptable were sometimes moved around without sanctions being applied, and that the system could tackle anti-social behaviour more robustly. Some respondents advocated the use of other measures as a first step in tackling anti-social behaviour.
Feedback from respondents

‘…prefer to see the use of Acceptable Behaviour Contracts (already in use by NIHE as a first stage, before Anti-Social Behaviour Orders, and as used in Scotland), rather than exclusion from the waiting list.’

‘…unacceptable behaviour is an increasing problem across society and those individuals who persistently take part in unacceptable activities should not be able to move for one property to another without some sanctions.’

Departmental response and next steps

This proposal will proceed as per the consultation.

The Department acknowledges the serious impact that exclusion from an allocation of a social home or from Full Duty homelessness status has on both applicants and their wider household. However the objective is to strike a better balance between excluding people from the waiting list and prioritising vulnerable groups.

The proposed changes will enable the Housing Executive to better focus on whether someone is eligible for an allocation or for Full Duty homelessness status i.e. that they are not involved in behaviour that would make them ineligible prior to a tenancy being awarded, rather than trying to manage unacceptable behaviour (often referred to as anti-social behaviour) within a tenancy and considering the impact that might have on the wider community.

The proposed changes will enable a more efficient allocations system with greater tenancy sustainment, providing tools to aid decision-making around eligibility in the light of serious anti-social behaviour. Where an applicant can demonstrate that previous serious anti-social behaviour is likely to reduce or stop, for example because they are engaging with support services, they will be more likely to be found eligible than at present. However, it is vital that the Housing Executive is able to review and, if necessary, remove that status if serious anti-social behaviour occurs before the applicant is allocated a home.

For absolute clarity, these proposals require amendments to legislation. The amendments will be led by the Department and taken forward once a suitable legislative vehicle is identified. In the meantime, the Department has provided guidance to the Housing Executive to assist decision-making on eligibility in light of anti-social/unacceptable behaviour.

For planning purposes (subject to legislative processes) the Housing Executive has suggested that these proposals will be taken forward in the medium term (in the region of 18+ months from project commencement).
Proposal 4 Analysis

What we asked:

The Housing Executive can meet its duty to homeless applicants on a tenure-neutral basis, provided that the accommodation meets certain conditions.

This proposal should ensure a greater range of ways in which the Housing Executive can meet its duty to homeless applicants and increase the options for meeting applicants' housing need. Do you agree?

Out of a total of 185 responses, 142 (77%) responded to this proposal.

62% Support

Of those who indicated a position on this proposal, just over three out of five (62%) agreed with the proposal.

Breakdown of respondents who provided a position, by respondent type (%)

Support for this proposal was greater amongst members of the public, with 68% in agreement, compared to 50% of organisations.

Note: Due to rounding these totals may not always equal 100.
Summary of respondents’ views

Overall there was strong support for the Housing Executive to meet its duty to homeless applicants on a tenure-neutral basis, with over three out of five respondents supporting the proposal. The lack of social housing supply to meet demand was put forward by a number of respondents as rationale to support this proposal, with respondents noting that it may ease pressure on the social housing waiting list. Others stated that clear information and advice is crucial for those considering the private rented sector as a housing option. This should include what the process involves, what this means for homeless applicants, key definitions (e.g. standards) and details of support and safeguards to be put in place for applicants. The importance of security of tenure, affordability and housing standards was emphasised as crucial for social housing applicants. Some respondents also noted concerns around existing regulation of the private rented sector and raised questions around the suitability of the sector for applicants looking to avail of social housing.

“...understands the importance of alleviating the housing stress and a range of housing options may assist with this. Whilst private rental may be an option for applicants, the security of tenure is vitally important for both applicants and for the sustainability of communities.”

“If customers are being steered towards private rental... this sector should be monitored and regulated more closely.”

There are ongoing problems with standards of fitness in private sector accommodation
Themes raised by respondents

- A view that the private sector is required due to lack of social housing supply
- The importance of clear advice and adequate support and safeguards for those considering or accepting private rented accommodation
- The importance of security of tenure
- Affordability
- Property Standards
- The importance of robust regulation

A number of respondents noted that other options, including the private rented sector, are required due to lack of social housing supply. Respondents stated that the demand for social housing exceeds supply and recognised the need for alternatives, including the Private Rented Sector, to be considered. It was suggested that this would open up other options for homeless people.

Feedback from respondents

‘It is recognised that there is a need to make effective use of private rented sector to ensure people are not left homeless given the current shortage of available social housing...’

‘...accepts the introduction of the private rented sector as a means of addressing housing needs may have some merit as this would increase available options, however we would have continuing concerns in relation to the affordability, appropriateness and quality of the private rented sector.’

Feedback highlighted the importance of clear advice, adequate support and safeguards for those considering or accepting private rented accommodation. Respondents felt that those applying for social homes require realistic advice about the differences between social housing and private rented accommodation, before accepting a privately rented home. This should include an explanation of the process and support available. It was noted that social landlords offer more than accommodation to tenants, including support which may meet the needs of social housing applicants. There was also a perception that private landlords are not as responsive to the needs of tenants; particularly those with complex needs.
Feedback from respondents

‘Whilst other tenures should be fully utilised to ease pressure on the waiting list, housing associations provide more than just housing and are a more sustainable option to address homelessness and its causes than other tenures.’

‘Greater clarity is required as to what constitutes “appropriate” and “reasonable”, what standards and safeguards will be developed to ensure quality and equity, and how these will be delivered in practice.’

• It was noted that security of tenure is important for applicants and for the sustainability of communities. Respondents stated that the instability offered by the private rented sector may contribute to repeat homelessness. It was considered particularly problematic for those previously in care or those with mental health issues. Others emphasised that a reasonable period of time for a tenancy should be more than 12 months.

Feedback from respondents

‘Short-term private rented sector tenancies can create a ‘revolving door’ with the applicant back on the waiting list, or homeless, as a result.’

A 12-month tenancy is not long enough to justify the NIHE discharging their duty into the private sector; sufficient stability and security to satisfy the discharge of the homeless duty cannot be achieved.’

• The concern that the private rented sector is not affordable was raised by respondents. In particular it was noted that higher rents can lead to affordability issues for low income households and the requirement for deposits is likely to be an obstacle for many. Others stated that this proposal may cost the public purse more in terms of Housing Benefit or housing element of Universal Credit.

Feedback from respondents

‘...any requirement for a substantial deposit may be an inhibiting obstacle for many households.’

‘...housing homeless people in the PRS, whose rents are higher than both housing associations and the NIHE means it will cost the public purse more in Housing Benefit. This does not represent value for money for the taxpayer.’
• Respondents expressed concerns that housing standards in the Private Rented Sector vary considerably – properties at the lower end of the market may not meet acceptable standards. Clarity is required as to what constitutes ‘appropriate’ or ‘reasonable’ standards. Questions were asked about who would check if private rented accommodation is up to standard before being offered to a social housing applicant.

Feedback from respondents

‘Social housing stock is of better quality and social housing landlords are required to address maintenance issues as and when they arise.’

‘There is no mechanism in place to inspect private accommodation or to ensure that certain standards are met or maintained. There is no arrangement in place whereby an emergency situation can be/will be dealt with by a private landlord when the need arises.’

• Feedback highlighted the importance of robust regulation. There is a perception that recent regulatory measures need to be further developed if discharge of the homelessness duty to private rented sector is to be realised. Respondents emphasised that regulatory measures are required in relation to minimum standards and compliance.

Feedback from respondents

‘Regulations and standards must be substantially improved before discharging applicants to the private rented sector.’

‘We are also concerned that the private rental sector remains insufficiently regulated for this to be a safe, appropriate, affordable option for those in housing distress.’
Departmental response and next steps

This proposal will proceed as per the consultation.

The Department recognises that social housing is the preferred option for most applicants, especially the most vulnerable, however the private rented sector may be an appropriate choice for some. This is in the context of improvements in the regulation of the private rented sector.

Given the lack of social housing to meet demand, it is important that other methods of meeting housing need are considered. Protecting the most vulnerable people will be a priority and further work on this proposal will ensure that the appropriate safeguards are in place.

It is important that the complexities of such a proposal are fully understood and that the feedback from the consultation regarding conditions for discharge are carefully considered. Prior to proceeding with this proposal, the Housing Executive will undertake an initial scoping exercise to consider the practicalities associated (including significant IT/system changes) with implementing discharge into the private rented sector. In addition it is envisaged that this exercise will provide greater clarity on the impacts and the safeguards which may be required. For these reasons, the Housing Executive will take forward in the long term (24+ months from project commencement).
Proposal 5 Analysis

What we asked:

A greater choice of areas for all applicants for a social home

All applicants should be able to choose as many (or as few) housing areas as they wish to maximise the likelihood of receiving an offer of a home they can accept. Do you agree?

Out of a total of 185 responses, 124 (67%) responded to this proposal

Response Rate 67%

85% Support

Of those who indicated a position on this proposal, more than four out of five (85%) agreed with the proposal

Breakdown of respondents who provided a position, by respondent type (%)

Support for this proposal was greater amongst organisations, with 96% in agreement, compared to 77% of members of the public

Note: Due to rounding these totals may not always equal 100
Summary of respondents’ views

There was very strong support, with more than four out of five people supporting the proposal which allows a greater choice of areas, including the removal of the automatic expansion to the larger General Housing Area after six months for homeless applicants. Feedback indicated that this change should be made in the context of tailored support and up-to-date, localised advice; ensuring applicants are empowered to make appropriate choices. Respondents welcomed the flexibility for applicants to choose as many or as few areas as they want. It was also noted that informed decision-making may lead to a reduction in refusals and an increase in tenancy sustainment. Others stated that there was a risk that applicants may feel pressure to increase their number of choices to areas they don’t really want. In particular, they highlighted specific consideration of the needs of vulnerable applicants.

“Many applicants will choose a high number of areas without actually considering if they could envisage a life there (this is particularly relevant to vulnerable applicants).”

“...the current system can limit applicants to a small CLA with limited turnover, this option provides people on the waiting list with greater choice and flexibility, it will enable applicants to make realistic, informed choice.”

“Whilst there may be more administration associated with potentially offering more area choices for applicants, this should also result in less administration caused by offer refusals.”

“In addition, important measures must be taken to ensure that all applicants have access to advice on areas of choice, which is both timely and accurate. The specific circumstances of each applicant should also be considered.”
Themes raised by respondents

- The importance of person-centred, open and accurate advice
- The increased options for applicants allows greater flexibility
- The proposal has the potential to reduce the number of refusals
- Applicants should not be ‘pushed’ to choose areas

- A large number of respondents highlighted the importance of applicants receiving person-centred, open and accurate advice to assist in their choice of areas; noting in particular the importance of understanding each applicant’s specific circumstances and their housing expectations and needs. By doing this applicants will be empowered to make informed decisions and ultimately will receive offers that they will be more likely to accept.

Feedback from respondents

‘A person-centred housing advice service should advise applicants of what accommodation is available in each area and assist them to choose as many suitable areas where they would be prepared to live.’

‘Agree with the introduction of the proposal, as long as the driver is maximising choice for applicants, appropriate safeguards are put in place, and it is predicated upon an independent and effective advice service.’

- Respondents noted that increasing the number of choices for applicants would allow for greater flexibility, noting the view that the current system does not recognise those applicants who are willing to live in a number of different areas. It was suggested that flexibility would positively impact on an applicant’s willingness to accept an offer - an offer in a location of their choosing.

Feedback from respondents

‘Some people may be quite flexible especially if their need is great enough, but the current system does not accommodate them.’

‘Allowing applicants to choose a greater number of areas of choice gives them a better sense of empowerment because they have the ability to choose lots of areas which will speed up the process of getting housed...’
A number of respondents felt that this proposal had the potential to reduce the number of refusals with greater choice meaning applicants are more likely to receive an offer that they would be willing to accept. Under the current system, where a homeless applicant is not re-housed after six months on the waiting list, their areas of choice are increased to the wider general housing area which relates to their area of choice. By removing the automatic expansion to the larger area, the likelihood of refusals will be reduced as applicants will not receive offers for homes in areas where they are not prepared to live. This should be realised in the context of the tailored support through the Housing Solutions and Support Teams.

Feedback from respondents

‘A greater choice of potential areas to live may reduce the number of ‘unreasonable’ offers.’

‘...supports the proposal to remove the automatic introduction of the General Housing Areas to all FDA [Full Duty Applicant] cases after 6 months as offers issued as a result of this are often refused causing frustration for the applicant and contributing to potential difficulties for landlords in effectively allocating accommodation.’

Some respondents expressed concerns that an applicant may be ‘pushed’ into an unsuitable area or feel pressure to increase their choices without fully considering the potential consequences (e.g. removed from family support). The need to specifically consider the requirements of vulnerable applicants was raised by a number of respondents in this context.

Feedback from respondents

‘Have concerns that some applicants will reluctantly increase the number of areas in an attempt to secure a home.’

‘This proposal should not be used to force vulnerable people to take housing in an area that takes them away from vital support networks.’
Departmental response and next steps

This proposal will proceed as per the consultation.

Fairness and equality of access to homes is paramount. Removing the current restriction on areas of choice gives applicants the option to choose as many areas as they wish, whilst still retaining the ability to limit choice to as few as an applicant wishes.

Increased choice, particularly in the context of up-to-date, tailored advice, allows applicants to precisely pinpoint areas where they would be prepared to live and by not limiting the number of choices an applicant may make, applicants may be more likely to be offered a home more quickly. Additionally, by applicants selecting areas where they wish to live, there will be an increased likelihood of tenancy sustainment.

The automatic expansion of areas of choice to wider areas for Full Duty Applicants often leads to refusals, as the property was not in an area chosen by the applicant. The Department believes that by removing this automatic expansion and instead making the applicant at the centre of choosing where they wish to live, this will lead to a reduction in refusals; streamlining the process and enabling landlords to address homelessness and housing stress more efficiently and effectively.

Subject to the necessary approvals, resourcing and any required system changes being achievable, the Housing Executive has indicated that this proposal may be taken forward in the short term (in the region of 9-12 months from project commencement).
Proposal 6 Analysis

What we asked:

Greater use of a mutual exchange service

Existing social tenants looking for a transfer should ordinarily also be considered for a mutual exchange service. Do you agree?

Out of a total of 185 responses, 117 (63%) responded to this proposal

90% Support

Of those who indicated a position on this proposal, nine out of ten (90%) agreed with the proposal

Breakdown of respondents who provided a position, by respondent type (%)

Support for this proposal was greatest amongst organisations, with 96% in agreement, compared to 88% of members of the public

Note: Due to rounding these totals may not always equal 100
Summary of respondents’ views

There was overwhelming support, with nine out of ten respondents supporting the greater use of a mutual exchange service. Feedback indicated the view that this service will help social landlords make better use of stock and that it has the potential to create sustainable tenancies – the latter due to the fact that applicants can easily access online information (including photographs) regarding the property and its location. This provides an opportunity to browse and explore options, allowing applicants to make an informed choice before accepting.

Some respondents suggested that this service is a useful housing management tool for landlords and an alternative mechanism for tenants to find more suitable accommodation, especially for those impacted by Social Sector Size Criteria or Welfare Reform. It was noted that up-to-date information should be readily available, including details of the process itself, and greater promotion of the service. Others stated that the service should be accessible to all, always respecting the privacy of users.

"...strongly supports any measures or proposals which would make it easier for tenants to move within the pool of social housing stock."

"...also help tenants that may be financially challenged by bedroom tax and potential arrears to find more affordable and appropriate accommodation."

"We endorse the use of mutual exchanges, where applicable, to optimise the use of the housing stock; we can point to a number of good practice examples where this happens to the benefit of landlord and tenants."

"...would also highlight that a public information campaign is necessary to promote knowledge and use of the Mutual Exchange Service."
Themes raised by respondents

- Increased use of the mutual exchange service could help make **better use of stock** and **assist transfer applicants**
- The importance of a **consistent approach and clear guidance**
- The need to **promote the service more**
- The need to ensure **opportunity of access** to the service, having due regard to the **safety of users**

- A common theme noted by respondents was around the potential this proposal had to make **better use of stock**; reducing the number of voids and relieving pressure on both transfer and waiting lists. Others identified the possibility of the mutual exchange service **assisting transfer applicants** by helping tenants identify more suitable properties, particularly those who may be financially challenged by benefit entitlement in the context of Welfare Reform changes.

**Feedback from respondents**

‘...the system also has proven to help improve levels of tenant satisfaction and tenancy sustainment once secure tenancy status is reached as the tenant can choose their new property to a certain extent for example, location, size, property style etc.’

‘...will potentially allow tenants to occupy a property that meets their needs better and in a more efficient way than applying to the waiting list.’

- The importance of a **consistent approach and clear guidance** for both tenants and staff. It was noted that an **open and transparent system** is required, with some respondents emphasising the importance of providing assurance that the system and all criteria are applied consistently across the board.

**Feedback from respondents**

‘Information to tenants on how the system operates, how to apply and access information on properties available, as well as clear guidance on the rules relating to the approval of exchanges would be beneficial.’

‘...mutual exchange systems must be properly managed, be open and transparent and be accessible to those who might benefit from them.’
• Respondents felt that the service requires greater promotion; that it is currently under-utilised and more should be done to actively promote the service and encourage uptake.

  **Feedback from respondents**

  ‘...this service needs to be actively promoted and the mutual exchange register well maintained.’

  ‘More effort should be made by housing providers to promote the use of mutual exchanges... this service needs promoted within offices, highlighted more in newsletters and perhaps at sign up.’

• Respondents felt that care must be taken to ensure opportunity of access to this service, having due regard to the safety of users. Some suggested it would be beneficial to have staff trained to practically assist tenants and applicants access and avail of the service; others suggested that it should be part of the advice service.

  **Feedback from respondents**

  ‘We would encourage the Department to ensure that steps are taken to guarantee equality in access to this exchange service...’

  ‘The ‘Mutual Housing Exchange’ service should be promoted to all tenants. When a tenant applies for a transfer of accommodation, this service (and its benefits) should be discussed with assistance made available (online access, etc.) if required.’
Departmental response and next steps

This proposal will proceed as per the consultation.

The Department believes that this is a good housing management tool for both applicants and social landlords that may help with reducing void properties and waiting times. It is important to find more ways to empower tenants to make informed choices around the best housing option for them and their family. This proposal has the potential to increase tenancy sustainment and help to build communities.

It is important to encourage greater use of this kind of service and to ensure it is used to its full capability. Increased promotion of the existing service will be implemented to ensure fairness and accessibility for all. Safeguarding measures will be in place to protect all service users, particularly those who are vulnerable.

The Housing Executive will review policies and procedures, and enhance staff guidance and training to ensure transparency and consistency of approach. It will also consider suitable IT options for tenants (for example, a tenant portal) to ensure accessibility.

Preliminary considerations (subject to approvals, budget and resourcing) estimate that the Housing Executive may take forward this proposal in the short term (in the region of 9–12 months from project commencement).
Proposal 7 Analysis

What we asked:
The removal of intimidation points from the Selection Scheme
This would not affect the urgent help for those experiencing intimidation. Where a person is in danger the Housing Executive would remove them from that danger and offer alternative accommodation on an emergency basis. This should recognise the housing need of intimidated households in a fairer and more proportionate way. Do you agree?

Out of a total of 185 responses, 158 (85%) responded to this proposal

66% Support
Of those who indicated a position on this proposal, almost seven out of ten (66%) agreed with the proposal

Breakdown of respondents who provided a position, by respondent type (%)
Support for this proposal was greater amongst members of the public, with 69% in agreement, compared to 60% of organisations

Note: Due to rounding these totals may not always equal 100
Summary of respondents’ views

The majority of respondents agreed with the proposal to remove intimidation points from the Selection Scheme, with almost seven out of ten respondents supporting the proposal. Many respondents put forward a view that the proposal would ensure greater fairness, and remove the over-riding priority that those receiving intimidation points have over those in equally high housing need. This theme was highlighted by respondents who both agreed and disagreed with the proposal. The importance of multi-agency working to address the underlying causes of intimidation was highlighted. A number of respondents noted a perception that intimidation points are abused at the moment and there was a need for greater transparency, clear processes and guidance moving forward. Some proposed an alternative system where intimidation points would still be awarded, but at a reduced level or with a weighting applied to reflect trauma. Others felt that points should be extended to award points for other traumatic circumstances. Concerns were also raised by respondents regarding the safety of victims and the wider community. A number of respondents stated that the emergency grant, often awarded alongside intimidation points, should be removed.

...recognises the commitment given to address the immediate personal safety of the applicant and then address the applicant’s housing need via the Selection Scheme.

We believe that removing intimidation points from the Selection Scheme would meet the objective of greater parity with other applicants who are also considered to be in serious housing need. It appears to us to be a fairer and more proportionate way to deal with all emergency situations.

...expressed concerns about intimidation points being exploited by some to gain a tenancy ahead of others on the waiting list.

Welcome the cross-departmental/cross agency-approach to dealing with issues of hate crime/intimidation.

This [emergency grant] can be seen as an additional incentive this grant should be removed or reduced...
Themes raised by respondents

- The view that the removal of intimidation points would make the system fairer
- The importance of greater transparency, clear processes and guidance, particularly given the perception that intimidation points are abused
- A multi-agency approach is key to addressing intimidation
- Points should be retained, but reduced or weighted or extended to include other traumatic circumstances
- Importance of safety and support for intimidation victims and wider community

A common theme reflected in comments by respondents was that the proposal would make the system fairer, and would help those in greatest housing need. In this context, feedback indicated that the current system may benefit and even provide super-priority to those who have engaged in anti-social behaviour, and then become the victims of intimidation themselves. Whilst intimidation in any circumstance is clearly wrong, some respondents felt particularly aggrieved by the award of intimidation points to these individuals. Many respondents stated that all applicants in serious housing need should be treated equitably, and a proportionate response is required.

Feedback from respondents

‘A fairer and more proportionate approach to dealing with intimidation would be to remove all people who experience intimidation from danger and offer alternative accommodation on an emergency basis, and apply the rules of the selection scheme without intimidation points to determine priority for re-housing.’

‘It is widely perceived that intimidation points are used to queue jump the waiting list and those who receive intimidation points are often guilty of unacceptable behaviour.’

The importance of greater transparency, clear processes and guidance was raised, particularly as there is a perception that intimidation points are abused. Respondents highlighted a range of issues that related to the process for awarding intimidation points, including around the gathering of evidence, the input of a wide range of professionals, and a system of checks and balances at all levels. Respondents noted anecdotal evidence that applicants exploit the system to secure a place at the top of the waiting list, and stated that the verification system needed to be robust in order to prevent exploitation.
Feedback from respondents

‘We also took the view that where such so-called ‘intimidation points’ are retained, it should be within a system of stringent and rigorous checks.’

‘We would support a scheme that weighs up the risk, danger posed, and urgency of case for being rehoused. This would apply in all cases where emergency rehousing was being considered.’

• A multi-agency approach was noted as key to addressing intimidation. Respondents emphasised that a range of statutory and voluntary and community organisations had a role to play in tackling intimidation and in supporting victims.

Feedback from respondents

‘Victims of intimidation should be supported through a holistic, multi-agency approach that looks at each case on an individual basis...’

‘...would encourage the Department and the NIHE to foster strong links with organisations... to ensure early and appropriate actions can be taken in response to identified issues. We would also encourage the Department to further their links ... to ensure that adequate support is in place to deal with this proposed change.’

• Some respondents commented that cases of intimidation should still be recognised via the allocation of points, but at a reduced level or weighting equivalent to the impact that trauma has on individuals. Others felt that points should be extended to include other traumatic circumstances. Respondents felt that other groups, such as victims of violence or trauma, should have parity with victims of intimidation.

Feedback from respondents

‘... a fairer system would be to reduce the 200 points...’

‘We recommend that the current process is overhauled to account for varying degrees and types of hate crime, as well as serious emergency housing need. This should include an evidenced weighting for trauma, and recognition of the resultant housing need.’
Respondents emphasised the importance of safety and support for victims of intimidation and the wider community. They highlighted the impact of intimidation on communities, and the need to ensure support and protection continues for victims. Some respondents expressed concern around where victims of intimidation (those perceived to have been involved in anti-social behaviour) are rehoused, and the potential negative impact this could have on the local community. A number of respondents commented that the emergency grant, normally awarded alongside intimidation points, should be removed.

“Feedback from respondents

‘Protecting victims requires a holistic approach and must include preventative and response interventions…’

‘Opposes the complete removal of points for intimidation without any proposed effective replacement, because the consequences involving a risk to life are so great and extremely traumatic.’

Departmental response and next steps

This proposal will not proceed.

The Department is instead considering an alternative proposal and will commence work to investigate how to:

• strengthen the verification process to ensure that those who are genuinely being intimidated receive the priority they deserve and to prevent any abuse of the system; and

• address the current inconsistencies where other victims of trauma or violence, for example, victims of domestic abuse, do not currently receive intimidation points.

Protecting the most vulnerable in our society is central. Therefore, the immediate personal safety of those who have suffered intimidation will remain front and centre. Robust, clear and consistent processes are required and tightening of these will be considered.

Given the new exploratory work required for this amended proposal, it is anticipated that this will involve a long term timescale (24+ months from project commencement). The current system will remain in the interim but with improvements to the verification process as and when these are identified.
Proposal 8 Analysis

What we asked:
Points should reflect current circumstances for all applicants
This should make the scheme fairer and more transparent to applicants as they know they will be assessed on their current circumstances. It should also maintain a focus on prioritising current housing needs. Do you agree?

Out of a total of 185 responses, 118 (64%) responded to this proposal

89% Support
Of those who indicated a position on this proposal, almost nine out of ten (89%) agreed with the proposal

Breakdown of respondents who provided a position, by respondent type (%)
Support for this proposal was similar amongst organisations (88%) and members of the public (90%)

Note: Due to rounding these totals may not always equal 100
Summary of respondents’ views

There was strong support for this proposal, with almost nine out of ten respondents endorsing the proposal that points should reflect current circumstances for all applicants. Feedback indicated that respondents believed that the removal of the ‘no detriment’ policy (which meant that Full Duty homeless applicants could only have points added and never taken away) will result in a fairer approach for all. Respondents stated that the proposal would ensure the focus of the scheme remains on current housing need. Key factors noted included: the importance of clearly communicating changes to the current system; highlighting impacts for applicants; and the need to consider operational impacts.

“Applicants’ eligibility and priority should reflect their current circumstances, rather than circumstances as they existed at a point in the past. This will make the scheme fairer for all applicants.”

“It may be an operational challenge to maintain a “live” ongoing record.”

“What are the methods in which changes of circumstances can be reported? [We] recommend that applicants on their annual review form affirm to the fact that their circumstances are the same.”
Themes raised by respondents

- Creating a fairer system for all applicants
- The importance of a consistent approach and clear guidance
- The need to consider the operational impact of the change

A number of respondents felt this proposal offered the opportunity for a fairer system for all applicants which ensured that social homes were awarded on current housing need and not outdated circumstances. Feedback indicated that this would ensure greater transparency and an up-to-date waiting list which accurately reflects need.

Feedback from respondents

‘The points awarded should be current in relation to all contemporary circumstances in order to ensure fairness and an award of points based on actual need at the time of assessment or reassessment.’

‘We feel a system to review an applicant’s circumstances on a more regular basis is required and points should be awarded or reduced depending on current circumstances.’

The importance of a consistent approach and clear guidance. Respondents noted that for many applicants this will be a major change. This must be clearly communicated, with clear guidelines, so that everyone is clear about the process (including any transitional arrangements) and how this will affect them. Vulnerable applicants in particular must receive adequate support in this regard.
Feedback from respondents

‘Concern that vulnerable tenants who have had a change of circumstances that could potentially affect their points may not be in a position to contact the NIHE.’

‘It is not clear how introducing this change in future would impact on people already in the system, having been assessed and awarded and a commitment given to those individuals.’

Respondents noted that the operational impact may be considerable. Some highlighted the potential difficulty for the Housing Executive to manage this, particularly as applicants may not be forthcoming about notifying of changes of circumstances due to the potential loss of points. Key potential impacts to be considered include the establishment of new processes and management of reassessments alongside the current volume of applications.

Feedback from respondents

‘With the volume of applications to the NIHE rising, consideration would need to be given to the operational aspects of being able to re-assess applications on a regular or annual basis.’

‘This proposal will only increase paperwork as these circumstances can change regularly.’

Departmental response and next steps

This proposal will proceed as per the consultation.

The Department believes that fairness and equality within the Selection Scheme are paramount, as is the protection of the most vulnerable in our society, in particular households in current housing stress. This proposal will ensure the effective operation of the Selection Scheme, resulting in a more accurate waiting list that reflects current housing circumstances and need. This will create a level playing field for all.

The proposal is currently undergoing further investigation and analysis which is being undertaken by an independent researcher to assess the operational impacts. This change represents a significant body of work given the major reassessment exercise that will be required and the significant system and IT changes. Subject to approvals, budget and resourcing, the Housing Executive has indicated that this may be taken forward in the medium term (in the region of 18+ months from project commencement).
Proposal 9 Analysis

What we asked:
The removal of interim accommodation points from the Selection Scheme

This proposal aims to:
• Provide more equal treatment of applicants in similar circumstances;
• Ensure a more accurate waiting list that reflects current housing circumstances; and
• Ensure those in greatest need receive priority.

Do you agree?

Out of a total of 185 responses, 115 (62%) responded to this proposal

Response Rate 62%

54% Support

Of those who indicated a position on this proposal, just over half (54%) agreed with the proposal

Breakdown of respondents who provided a position, by respondent type (%)

Support for this proposal was greater amongst members of the public, with 57% in agreement, compared to 49% of organisations

Note: Due to rounding these totals may not always equal 100
Summary of respondents’ views

A small majority of respondents, just over half, supported the proposal to remove interim accommodation points from the Housing Selection Scheme. Feedback was mixed. Some indicated this change would make the allocations process fairer for all, whilst others thought it more appropriate to give points to all in temporary accommodation. There was some concern that vulnerable applicants may be adversely affected by the removal of interim accommodation points, and that this proposal may lead to more time spent in temporary accommodation. The development of a strategy to reduce reliance on temporary accommodation was recommended. It was suggested that this proposal would work alongside the introduction of Proposal 10, which would place applicants into bands of need and then allocate based on time waiting.

“Interim points were designed to...facilitate a quicker allocation of a home. However the high demand for social housing means that in most cases these points will not result in applicants being allocated a home more quickly. The DfC proposal to allocate by time served within bands... is a fairer approach that will better address the length of time spent waiting in temporary accommodation.”

“Proposal 9 will impact homeless individuals and families, who are already particularly vulnerable and disenfranchised”

“Steps need to be taken to expedite the development of the ‘Temporary Accommodation Provision Strategy’”
Themes raised by respondents

- The removal of points will make the allocations process fairer – currently the award of points is inequitable.
- The proposal is welcomed in conjunction with banding i.e. increased weight for time waiting.
- The need for a review or strategy for temporary accommodation.
- Concern over how vulnerable applicants will be affected if points are removed.

Feedback from respondents

‘These points only apply to applicants placed in temporary accommodation by the NIHE, and not those homeless applicants who have secured their own temporary accommodation or remain staying with family/friends, this raises concerns around fairness.

‘Strongly Agree in that this would result in a more accurate waiting list that reflects current housing circumstances and those in greatest housing need would receive priority, with recognition of their time in need, irrespective if they have secured a temporary location in the meantime.’

The proposal is welcomed in conjunction with the banding proposal (10). It was felt that increased weight for time waiting will better address the length of time spent in temporary accommodation. However, some respondents expressed concerns that the removal of the interim accommodation points may actually lengthen the time spent in temporary accommodation.

Feedback from respondents

‘[We] anticipate that with the application of appropriate bandings Interim Accommodation Points would no longer be applicable.’

‘Members voiced concerns that the removal of points may increase silting up in temporary accommodation – longer stays in these accommodation settings will have a negative effect on physical and mental health. This in turn is more costly to the public purse.’
• The need for a **review or strategy** for temporary accommodation. It was recommended that a temporary accommodation strategy should be urgently considered if statutory obligations to homeless individuals and households are to be adequately met.

**Feedback from respondents**

‘The Temporary Accommodation Provision Strategy should be developed, and consulted upon, as soon as possible.’

‘Further information will be needed as to how the intention of this strategy is going to be realised and how the current crisis regarding the lack of suitable temporary accommodation in NI is going to be addressed.’

• Concern over how **vulnerable** applicants will be affected if points are removed - they may spend longer time in temporary accommodation. Some respondents acknowledged the detrimental impact that living in temporary housing may have on the quality of life of residents, particularly for those with complex needs.

**Feedback from respondents**

‘Need to recognise those who are “homeless at home” – a lack of accessible accommodation in the private rented sector and in emergency accommodation means that some people with disabilities must remain in unsuitable accommodation or living conditions or will find it difficult to move to independence.’

‘...considers that the 20 points awarded for those who have spent six months in temporary accommodation should remain, which recognises the additional stress associated with living in temporary accommodation.’

**Departmental response and next steps**

This proposal will not proceed.

The Department believes that all those who find themselves in temporary accommodation should be treated in a similar way. Having reviewed the consultation proposals and concerns raised, an alternative proposal is being considered whereby points may be awarded to those applicants who find themselves in any form of temporary accommodation.

This amended proposal will require further analysis and will therefore involve a long term timescale (24+ months from project commencement). The current process will remain in the interim.
Proposal 10 Analysis

What we asked:
The Selection Scheme should place applicants into bands based on similar levels of need to meet longstanding housing need more effectively.

Applicants should be assessed and points awarded, just as they are in the Selection Scheme at present. The points should then be used to place applicants in bands, alongside others with similar levels of need. Do you agree?

Out of a total of 185 responses, 139 (75%) responded to this proposal.

Response Rate 75%

72% Support

Of those who indicated a position on this proposal, almost three out of four (72%) agreed with the proposal.

Breakdown of respondents who provided a position, by respondent type (%)

Support for this proposal was greater amongst organisations, with 76% in agreement, compared to 70% of members of the public.

Note: Due to rounding these totals may not always equal 100.
Summary of respondents’ views

Almost three out of four respondents, supported this proposal; to place applicants into bands based on similar levels of need, to meet longstanding housing need more effectively. Feedback indicated that this change could make the allocations process fairer, addressing existing ‘overtaking’ on the waiting list. However, given the potential substantial change the new system would bring, some respondents called for further modelling to be carried out to reinforce the rationale for change and determine the most effective band structure. Others suggested allocating more points for time in need rather than moving to a banding approach.

“...[we] would encourage the Department to properly scope out...any new system prior to implementation, to ensure a transparent and appropriate system is developed.”

“This proposal has the potential to address longstanding housing need.”

“...a better system of allocation could be to provide a more frequent allocation of points to recognise the length of time that people have been waiting.”
Themes raised by respondents

- A banding approach will make the allocations process **fairer**
- The proposal requires **further modelling**, including any proposed band structure
- More points for time as an **alternative to banding**

- A banding approach could make the allocations process **fairer**. Respondents felt that the proposed change would improve transparency. Some respondents stated this approach is simpler and easier to understand, creating a ‘true’ waiting list, based on time spent on the list. It was suggested this may help manage expectations amongst applicants. Others felt the proposed approach will give everyone an equal chance and address the current situation where newly pointed applicants can bypass those currently waiting. Feedback also indicated an anticipated reduction in waiting times, particularly for those in high demand areas.

  **Feedback from respondents**

  ‘A simple system such as this is transparent, easy to understand and explain and quick and easy to administer.’

  ‘...longer time spent on waiting lists creates uncertainty and stress, and this must be factored into need. The proposed approach incorporates this fairly.’

- **Further modelling** on the proposed banding approach, **including any band structure is required**. Feedback indicated that given the small sample size of case studies presented in the consultation document, it was recommended that modelling with larger numbers should be taken forward. Respondents also remarked that the bands structure used by the Department for illustration purposes needed further consideration. Some respondents called for testing prior to any full implementation. Others suggested further consultation and, as a minimum, an evaluation of the new system to determine its effectiveness, keeping it under continuous review.
Feedback from respondents

‘...these bands need to be correctly and sensitively designed to ensure equality of access.’
‘We believe that a degree of further consultation needs to be completed in relation to appropriate banding selections.’

Some respondents recommended more time in need points as an alternative to banding, citing this would limit confusion and eliminate operational disruption and costs (IT and system changes). Others suggested an overhaul of the current position of awarding two points per year for a maximum of five years. Conversely, a small number of respondents felt that too much weight was being given to time waiting in the proposal.

Feedback from respondents

‘...it would be interesting to assess the impact of revamping the current position of awarding two points per year.’
‘...recommends, in line with our support for meeting objective need, that consideration is given to increasing the weight (number of points) allocated for ‘time in housing need’, within the points based system.’

Departmental response and next steps

This proposal will proceed as per the consultation.

The aim of this proposal is to ensure fairness, equality, clarity of approach and ensure an effective process for the allocation of social homes. The proposed changes aim to address concerns about the number of households waiting for a significant period of time for a social home by factoring in the period of time waiting for a particular household against other households in similar levels of need.

Substantial further modelling work will be required to develop this proposal. This work is currently underway and picks up on some of the consultation feedback around the need to carefully consider the number and size of the bands which may be used. The outcome of this independent research will assist in determining any implementation issues and potential timescales. A switch to a banding approach is likely to entail significant system and IT changes. Subject to approvals, budget and resourcing the Housing Executive has indicated that this will be taken forward in the long term (24+ months from project commencement).
Proposal 11 Analysis

What we asked:
The Selection Scheme rules should always align the number of bedrooms a household is assessed to need with the size criteria for eligible Housing Cost element of Universal Credit/Housing Benefit Customers

Aligning the Selection Scheme with the Housing Cost element of Universal Credit/Housing Benefit should ensure a consistent approach, avoid confusion for applicants and enable good housing management. Do you agree?

Out of a total of 185 responses, 124 (67%) responded to this proposal

67% Support

Of those who indicated a position on this proposal, two out of three (67%) agreed with the proposal

Support for this proposal was consistent amongst respondents, with 65% of organisations and 66% of members of the public in agreement

Breakdown of respondents who provided a position, by respondent type (%)

Note: Due to rounding these totals may not always equal 100
Summary of respondents’ views

The majority of respondents (two out of three) agreed with this proposal to align the number of bedrooms a household is assessed to need with the size criteria for eligible Universal Credit/Housing Benefit customers. Respondents agreed that the proposal may avoid confusion, uphold good housing management principles and make best use of stock. Feedback indicated that there needs to be an element of flexibility to accommodate certain circumstances for applicants, particularly to adjust for those with additional childcare or medical requirements. It was therefore suggested that the Selection Scheme rules should not ‘always’ but ‘generally’ align to allow for elements of flexibility. Some respondents raised concerns around a lack of suitable housing stock to cater for those who may be affected by the Social Sector Size Criteria. Others felt that this proposal may move the policy focus away from housing need.

…believes that a certain degree of discretion should be retained, for example to deal with an extra-ordinary set of circumstances that may warrant the allocation of accommodation that is not exactly aligned to assessed need.

This proposal would reduce the confusion currently being experienced by applicants.

It is vital that social landlords make best use of stock and ensure that housing is affordable...
Themes raised by respondents

- The need for flexibility and to consider an alternative wording to ‘always align’
- The need for suitable (smaller) stock
- The importance of maintaining a focus on housing need

A large number of respondents felt that flexibility is required regarding bedroom allocations within the Selection Scheme. Some emphasised the importance of catering for the specific circumstances of applicants/tenants as required. Others suggested that criteria for exceptions should be clearly set out, e.g. where an extra bedroom is required for overnight access to children. A number of respondents noted concern over the use of the wording ‘always align’, suggesting that this would be inflexible and restrictive. Alternative wording was suggested, including ‘generally align’ or ‘align where appropriate’.

Feedback from respondents

‘Guidance should be given regarding this to allow social landlords flexibility to allocate a home larger than needed where appropriate, particularly given the possible impact of any potential shortfall as a result of Housing Benefit restriction.’

‘[We] recommend that due to the fluid nature of social security policy, the Department may wish to change the word “always” to “generally”, this is to ensure that housing policy is not necessarily dictated by social security policy.’

Feedback emphasised the general concern in relation to the current lack of social housing to meet existing need. Respondents expressed concern over the lack of suitable stock, in particular smaller stock, should prospective tenants be faced with affordability issues as a result of restrictions in Housing Benefit/Universal Credit Housing Costs.

Feedback from respondents

‘[We] would support this proposal should the housing stock exist to facilitate it. There is currently a shortage of housing stock...therefore this change may disproportionately disadvantage applicants who require smaller homes.’

‘The quality of advice provided to tenants will be vital in ensuring that tenants who are under occupying properties are properly advised on their options to downsize...we would be concerned about the availability of suitably sized accommodation.’
Respondents indicated that **housing need** should remain the key focus of the Selection Scheme, rather than alignment with social security policy. Some respondents felt that housing policy should not be dictated by social security policy.

**Feedback from respondents**

‘Could result in changes to social security policy having unforeseen impacts on the Common Selection Scheme.’

‘We would have a fear that perhaps this proposal is driven with one eye on the social sector size criteria ...which should not be driving other policy formulation within the Housing Selection Scheme.’

**Departmental response and next steps**

This proposal will proceed.

This proposal will ensure general alignment between the benefits and housing systems, causing less confusion for applicants navigating both systems, and reducing the potential financial impact on tenants should the current mitigation schemes end at any point in the future. Flexibility will be retained, ensuring that social landlords can meet the specific needs of households, while ensuring good housing management where households are allocated/transfered to properties that best meet their needs.

The Housing Selection Scheme will be amended to generally align the number of bedrooms with the size criteria used in the Housing Cost element of Universal Credit assessment, ensuring flexibility is retained. Careful consideration will need to be given to the operational impacts of change and the need for clear guidance, particularly for vulnerable clients. Support and guidance will be provided via the Housing Solutions service.

This proposal requires a major reassessment exercise and significant system and IT changes. Subject to approvals, budget and resourcing, the Housing Executive has indicated that this proposal may be taken forward in the medium term (estimated as 18+ months from project commencement).
Proposals 12 & 14 Analysis

Proposal 12
What we asked:
For difficult-to-let properties: Social landlords should be able to make multiple offers to as many applicants as they think necessary.
The number of applicants contacted should be the number the landlord thinks is most likely to secure an allocation. Do you agree?

Out of a total of 185 responses, 112 (61%) responded to this proposal

Response Rate 61%

67% Support
Of those who indicated a position on this proposal, two out of three (67%) agreed with the proposal

Breakdown of respondents who provided a position, by respondent type (%)
Support for this proposal was greater amongst organisations, with 71% in agreement, compared to 61% of members of the public

Note: Due to rounding these totals may not always equal 100
Proposals 12 & 14 Analysis

Proposal 14
What we asked:
For difficult-to-let properties: Social landlords should be able to go direct to multiple offers if they have evidence that a property will be difficult to let.
Such evidence would mainly come from previous similar properties being difficult to let. Do you agree?

Out of a total of 185 responses, 112 (61%) responded to this proposal

Response Rate 61%

62% Support

Of those who indicated a position on this proposal, around three out of five (62%) agreed with the proposal

Breakdown of respondents who provided a position, by respondent type (%)

Support for this proposal was greater amongst organisations, with 72% in agreement, compared to 53% of members of the public

Note: Due to rounding these totals may not always equal 100
Summary of respondents’ views

In general, respondents considered and commented on Proposals 12 and 14 together. Feedback has therefore been analysed and presented for both proposals combined.

A large proportion of respondents (around two thirds across both proposals) expressed support for enabling social landlords to make multiple offers to as many applicants as they think necessary, and to move directly to multiple offers if they have evidence that a property will be difficult to let. Comments made by respondents stated that these proposals would help to minimise the time that social housing stock is empty. Some respondents highlighted the need for a consistent, transparent approach to difficult-to-let properties and clear guidance regarding implementation of the proposals. Respondents stated there was a need to deal with the underlying reasons as to why a property is difficult to let. Some respondents noted that vulnerable applicants needed to be supported in relation to considering difficult-to-let properties, and it was important to ensure they fully understood the process.

“This will lead to a better use of time and resources and reduce the risk of long term voids, loss of rental income, vandalism and length of time on the waiting list for applicants.”

“Vulnerable applicants need support to participate in... multiple offers...”

“Clear guidance as to what characterises a property as “difficult to let” and clear criterion should be set to determine “difficult to let” should be developed, rigorously tested, and applied.”
Themes raised by respondents

• Proposals will help minimise the time that social housing stock is empty
• The importance of consistent, transparent approach and clear guidance
• The need to deal with the reasons why a property is ‘difficult-to-let’
• The need to ensure that vulnerable applicants are supported and fully understand the process

• These proposals will help to minimise the time that social housing stock is empty and assist in good housing management. Respondents felt that the proposals would speed up lettings for these properties, and ensure that income loss is reduced, vandalism is avoided, and applicants are housed more quickly.

Feedback from respondents

‘...share the Department’s hope that these proposals will ensure that difficult-to-let properties are let more quickly and may increase the likelihood and speed of allocation for applicants in lower housing need.’

‘...we could consider this to be essential for good housing management and managing the potential for void properties and income lost.’

• A consistent, transparent approach and clear guidance are of utmost importance. Respondents stated that a clear definition of ‘difficult-to-let’ should be set out, and that reviews should be conducted to ensure this approach is working effectively. Some respondents emphasised the need to keep applicants fully informed of the process and how it works, highlighting the importance of tailored advice (Proposal 1). This was particularly important in the case of vulnerable applicants.

Feedback from respondents

‘Whilst we recognise the value, in certain circumstances, of applying multi-offers, this should only occur when certain tests, around difficulty of letting, are applied and that such mechanisms are time-bound and subject to periodic review.’

‘...it is essential that adequate and tailored advice is given to applicants when making a decision regarding accepting a property which is “difficult to let”. For example, explaining why the property is difficult to let.’
• The reasons why a property is ‘difficult-to-let’ should be dealt with. Respondents suggested that the agencies responsible should work in partnership to address the underlying issues as to why applicants will not accept those properties, e.g. working with the PSNI to address crime and community safety issues in the area. Some respondents highlighted that people should be provided with information and advice, particularly as to the reason why a property they are considering has been classed as difficult to let. Respondents emphasised that this would enable applicants to make a fully informed decision and so increase tenancy sustainment.

Feedback from respondents

‘Housing Executive and Partners (PSNI eg) need to help and root out the problems as to why it is hard to let.’

‘What constitutes “difficult-to-let”? The perception for many is that difficult to let equates to undesirable.’

• Ensure that vulnerable applicants are supported and fully understand the process. Some respondents raised concerns that vulnerable applicants may feel pressured to accept properties in less desirable areas. Others noted that safeguards should be put in place to ensure that applicants are fully engaged in and informed throughout the lettings process.

Feedback from respondents

‘It is imperative that procedural controls are implemented in order to ensure that the most vulnerable members of society are not exploited or taken advantage of.’

‘A further concern is the definition of ‘difficult to let’ and conversely the potential to place vulnerable clients into areas that they may not choose to live but feel pressured to accept.’
Departmental response and next steps

These proposals will proceed as per the consultation.

These proposals aim to provide applicants with more choice, and to provide a greater range of solutions to meet housing need. Given the acute shortage of social homes, the Department welcomes amendments to the Selection Scheme that offer alternative options for those on the waiting list and at the same time enable good housing management and better use of stock and resources.

The proposed changes simply represent an improved and more efficient process than the current administration of the system – which is that multiple offers are issued for a property to a maximum of 10 applicants. It is not considered a refusal if someone does not express an interest in a property let by multiple offers (Proposal 15). A property will be allocated to the applicant in the highest housing need who expresses an interest in that property. Applicants will be supported to use multi-offers via the Housing Solutions service.

Proposals 12 and 14 do not require significant system changes, therefore the Housing Executive has anticipated that these proposals may be taken forward in the short term (in the region of 9-12 months from project commencement).
Proposal 13 Analysis

What we asked:
For difficult-to-let properties: Social landlords should be able to use choice-based letting
Landlords must ensure that enough support is given to applicants to enable them to express an interest. Do you agree?

Out of a total of 185 responses, 132 (71%) responded to this proposal

Response Rate 71%

78% Support

Of those who indicated a position on this proposal, over three out of four (78%) agreed with the proposal

Breakdown of respondents who provided a position, by respondent type (%)

Support for this proposal was consistent amongst respondents with 79% of organisations and 78% of members of the public in agreement

Note: Due to rounding these totals may not always equal 100
Summary of respondents’ views

There was strong support amongst respondents for enabling social landlords to use choice-based letting for difficult-to-let properties, with over three quarters indicating support for this proposal. Feedback indicated that this proposal would help to minimise the time that social housing stock is empty and may lead to greater tenancy sustainment. Respondents emphasised that applicants should be able to easily access information and support throughout the choice-based lettings process, and, in turn, be empowered to make well-informed housing choices. Some respondents stated there was a need for a consistent, transparent approach to difficult-to-let properties and clear guidance regarding implementation. Others noted that vulnerable applicants need to be supported to use a choice-based lettings system, and in their consideration of difficult-to-let properties, ensuring they fully understand the process.

“Vulnerable applicants need support to participate in both multiple offers and choice-based letting, particularly with regards to internet accessibility issues and tight deadlines for a decision.”

“CBL can empower applicants and give them a sense of control over their housing future.”

“...agrees that landlords should be able to advertise hard to let homes to reduce voids and the associated management difficulties that arise with empty properties.”
Themes raised by respondents

- Proposal will help **minimise the time that social housing stock is empty**
- The importance of **access to information and support**
- Proposal should **empower applicants** to make informed housing choices
- The importance of a **consistent, transparent approach and clear guidance**
- The need to ensure that **vulnerable applicants are supported and fully understand the process**

- This proposal will help **minimise the time that social housing stock is empty**, assisting in good housing management. Respondents noted that it would provide more options for applicants, as they could apply for properties outside their areas of choice. In turn this could enable them to be housed more quickly, and may reduce pressure for housing in high demand areas. Respondents felt that the proposals would speed up lettings for these properties, and ensure that income loss is reduced and vandalism and other issues associated with void properties are minimised.

**Feedback from respondents**

‘Choice Based Lettings... can reduce the length of time that a property is empty. This is a sensible approach to addressing housing stress in a timely manner...’

‘Difficult-to-let properties are a wasted resource for both the NIHE and the applicants on the waiting list to be re-housed. The longer a property is void the more vulnerable it is to vandalism or anti-social behaviour...’

- Feedback emphasised the importance of **access to information and support**, including internet access for this online service. Some respondents suggested that a range of methods should be used for advertising choice-based lettings, not just online methods. Respondents emphasised the need to clearly communicate to applicants how the choice-based lettings process works. Some respondents highlighted that advice should be provided to ensure applicants are making fully informed choices, and they should be able to access detailed information on the property they are interested in. A number of respondents highlighted a potential role for other advice agencies and services in providing advice throughout the choice-based lettings process.
Feedback from respondents

‘Frontline staff, in particular those carrying out initial housing assessments and housing option interviews, have a crucial role to play in enabling applicants to understand and participate in the CBL [choice-based letting] system for DTL [Difficult-to-let] schemes and also to ensure referrals are done to other support agencies.’

‘...the Department may wish to utilise other advice agencies in ensuring individuals have access to “choice-based lettings” – i.e. computer hubs or advisers could be made available to assist individuals.’

- This proposal should **empower applicants** to make informed housing choices that will contribute to their overall wellbeing. Some felt that by providing applicants with comprehensive information and support, they would be equipped to make informed decisions. In turn, respondents felt this would lead to a reduction in refusals, and greater levels of tenancy sustainment as applicants only bid for properties they are interested in.

 Feedback from respondents

‘CBL [choice-based letting] schemes... give applicants the responsibility for matching themselves and making bids on properties that are advertised... the system empowers applicants, as they have the right to choose and therefore exercise a degree of control over the allocations system.’

‘...The benefits of CBL [choice-based letting] can include... increased engagement and interaction between housing providers and customers, better management of customers’ expectations...and more sustainable neighbourhoods.’

- Respondents felt that a **consistent approach with clear guidance** is extremely important. They highlighted the need for a defined process for frontline staff to follow, and noted that clear definitions and criteria should be in place. Some respondents also stated that reviews should be conducted regularly to ensure this approach works effectively, and that the outcomes of any evaluations conducted on existing choice-based lettings pilots should be used to improve the system as appropriate. Feedback highlighted that there should be safeguards in place to ensure the choice-based lettings system operates fairly and does not compromise the principle of allocations based on housing need.
Feedback from respondents

‘Whilst we have seen choice based letting schemes that have had the desired outcomes and benefits, we believe that they should be time-bound and subject to review and evaluation in each case.’

‘...adequate safeguards must be put in place to ensure fairness, suitability and sustainability of the tenancy.’

- Feedback highlighted that vulnerable applicants should be supported, and that housing providers should ensure they fully understand the process. Some respondents noted that vulnerable applicants required more support in order to engage with the lettings process, and highlighted the importance of ensuring that they have equal opportunity to access good quality housing. Others noted that vulnerable applicants could face barriers to securing appropriate housing, e.g. difficulties using an online system, or language issues, and so required support to overcome them.

Feedback from respondents

‘It may be beneficial at the application stage to include: in the housing application form whether support is needed to bid; a checklist for frontline staff when dealing with vulnerable people to ensure everything is covered including signposting for more assistance; and/or submission onto an assisted list.’

‘...concerns that vulnerable homeless people would not have the time, motivation, resources, and sometimes ability, to focus on choice based letting. Some pointed to accessibility (e.g. technological / connectivity, language / cultural) barriers, which negatively impact on equality of access.’
Departmental response and next steps

This proposal will proceed as per the consultation.

This proposal will result in a quicker and more efficient housing process, whilst ensuring priority will still be given to the applicant with the highest level of housing need. Given the acute shortage of social homes, the Department welcomes amendments to the Selection Scheme that offer alternative options for those on the waiting list and at the same time enable good housing management and better use of stock and resources.

Applicants will be supported to use choice-based lettings via the Housing Solutions service, ensuring equality of access and opportunity to avail of these properties, especially for vulnerable applicants.

New IT systems may be required to roll out choice-based lettings across all offices. With this in mind, subject to approvals, budget and resourcing, the Housing Executive estimates that this proposal may be brought forward in the long term (24+ months from project commencement).
Proposal 15 Analysis

What we asked:
An applicant may receive two reasonable offers of accommodation

- This proposal reduces the number of offers of accommodation from 3 to 2
- If the two offers are refused, no further offers will be made for one year after the date of the last refusal

Do you agree?

Out of a total of 185 responses, 133 (72%) responded to this proposal

Response Rate 72%

49% Support

Of those who indicated a position on this proposal, slightly more respondents agreed with the proposal (49%) compared to those who disagreed (44%)

Breakdown of respondents who provided a position, by respondent type (%)

Support for this proposal was greater amongst members of the public, with 52% in agreement, compared to 42% of organisations

Note: Due to rounding these totals may not always equal 100
Summary of respondents’ views

Overall, more respondents (49%) agreed with the proposal to reduce the number of reasonable offers from three to two, although a significant proportion disagreed with the proposal (44%). Respondents emphasised there was a need for a clear understanding of the process, including a definition of what constitutes a ‘reasonable’ offer. A number of respondents felt that offers were not always reasonable, and that suitability criteria should be adopted. Some respondents felt that refusals are often made because applicants were ‘holding out’ for something more desirable, not because a property is not reasonable to meet their needs. Others raised concerns that applicants may feel obliged to accept a property that may not be suitable for their circumstances.

“There is anecdotal evidence that applicants refuse offers based on choice and not the suitability of the property, as they seek to wait and see if they get offered a property that is more desirable to them.”

“...greater clarity regarding safeguards and what constitutes “reasonable” (and reasonable on whose terms?) “Suitability” of accommodation needs to be clearly...defined...”
Themes raised by respondents

• The need for clear understanding and a definition of what is a ‘reasonable’ offer
• Perception that offers are not always reasonable and suitability criteria should be adopted
• Perception that refusals are made because applicants are ‘holding out’ for a better property
• There are concerns applicants may feel obliged to take a property they do not think is suitable

Feedback from respondents

‘Reducing the number of reasonable offers of accommodation from three to two should assist in reducing re-let times and the length of time applicants will wait for an offer of accommodation... we feel that for this proposal to be effective, stringent guidelines are required to allow an offer of accommodation to be deemed unreasonable.’

‘We would question what will be considered as ‘reasonable’ and whether the definition of reasonable would be influenced by the individual circumstances of those being offered the home.’

• Feedback from respondents indicated the need for clearer understanding, on the part of both applicants and landlords, as to what constitutes a reasonable offer for each applicant. A number of respondents suggested that clear definitions are required.

‘There needs to be consistent, agreed, and appropriate terminology as suitability differs from ‘reasonable’ offer... Suitable accommodation is key – this needs to be clearly and legally defined...’

‘I believe that this reduction in reasonable offers highlights the need for a two-way system between both applicant and housing professional as to ensure the right property is being offered and that it matches the applicant’s needs.’
• Perception that refusals are made because applicants are holding out for a better property. Respondents stated that there was anecdotal evidence that some applicants turned down offers because a further offer may be preferable (e.g. precise location). Some respondents noted that it was important to manage applicants’ expectations and provide a realistic picture in terms of waiting times and available locations.

"Feedback from respondents"

‘Refusals are often used as a form of choice, with applicants waiting to see if a property/area is subsequently offered which is more desirable to them.’

‘...I believe that educating applicants and improving their knowledge around the waiting list and the allocation of housing will give them realistic expectations... When applicants have 3 reasonable offers it is believed that they think they have more of a choice and they ‘hold out’ to see what the next offer is in the hope that it will be a better offer.’

• Some respondents voiced concerns that, given the reduction in refusals applicants may feel under pressure or obliged to take a property they do not think is suitable.

"Feedback from respondents"

‘This option is basically forcing applicants to take options which they may not be happy with.’

‘...considers the reduction of three offers to two will pressurise applicants into accepting in haste.’
Departmental response and next steps

This proposal will proceed as per the consultation.

This proposal needs to be considered in the context of Proposals 1 (person-centred advice) and 5 (more areas of choice). It will be crucial that informed discussions take place between the applicant and Housing Adviser to set realistic expectations and to ensure that all relevant information is considered and recorded where necessary. This could include the applicant’s specific needs and the likely waiting time for a suitable offer. Both the Housing Adviser and applicant should be clear as to what will be acceptable for the applicant’s circumstances, and where relevant this should be recorded so this information is available to social landlords when they make an offer of accommodation. The aim is to ensure that offers meet applicants’ needs where possible, reducing the need for a refusal.

The Department believes that realistic advice and support along with the option to pinpoint areas will empower applicants to make more informed and appropriate housing choices and increase tenancy sustainment. This should reduce refusals and the subsequent administration; minimising the time stock is empty; and making best use of public resources.

This proposal will require system changes and testing. The Housing Executive has indicated that these changes may be taken forward in the short term (in the region of 9-12 months from project commencement).
Proposal 16 Analysis

What we asked:

Social landlords may withdraw an offer of accommodation in specified circumstances

This change is required to deal with a very specific, limited number of circumstances. Do you agree?

Out of a total of 185 responses, 109 (59%) responded to this proposal

Response Rate 59%

71% Support

Of those who indicated a position on this proposal, just over seven out of ten (71%) agreed with the proposal

Breakdown of respondents who provided a position, by respondent type (%)

Support for this proposal was greater amongst organisations, with 74% in agreement, compared to 69% of members of the public

Note: Due to rounding these totals may not always equal 100
Summary of respondents’ views

There was majority support for this proposal with just over seven out of ten respondents in favour of allowing social landlords to withdraw an offer of accommodation in specific circumstances.

Respondents acknowledged the significant impact for applicants if offers of tenancy are withdrawn. Feedback emphasised the importance of fairness for all applicants and the right to appeal decisions. Others noted the need for transparency with clear guidance available for applicants and decision-makers to ensure rules are applied consistently across the board.

What are the “specified circumstances”? Who makes that call? How is it objectively evidenced?

We recognise that, on occasion, a withdrawal of an offer is deemed necessary; we would suggest that the circumstances for such action should be specified and any affected applicant should have the right to appeal.

…support the introduction of a new Rule in the Scheme that sets out the circumstances when this may happen, thus ensuring certainty and transparency.
Themes raised by respondents

- The need to ensure fairness for all, including the right to appeal
- Transparency is key; publish clear guidance specifying the circumstances and ensure a consistent approach

Respondents emphasised that fairness for all applicants is paramount. Feedback indicated safeguards should be in place to protect applicants and that no one should be disadvantaged. Also that applicants should have access to an appeal process. Some respondents also stated that this proposal should comply with legislation to ensure equality of provision and protection of individuals.

Feedback from respondents

‘...no objections to this proposal as long as the applicant is fully aware of the circumstances and has access to an appeal process.’

‘This proposal is likely to be beneficial, and improves transparency, provided appropriate safeguards are put in place.’

- Transparent, clear guidance around the specific circumstances and a consistent approach for all social landlords relating to withdrawals is required. Respondents stated that a standardised set of rules, highlighting the specific circumstances and related criteria, should be produced to ensure certainty and clarity for applicants and decision-makers.

Feedback from respondents

‘...to ensure decisions are fair and consistent clear guidelines would need to be produced outlining the evidence required and the process by which such a decision would be made.’

‘[We] welcome the introduction of such a rule, as it specifies the exhaustive circumstances in which an offer can be withdrawn... Housing Selection Scheme Guidance Manual must also be amended accordingly to provide robust guidance to decision makers.’
Departmental response and next steps

This proposal will proceed as per the consultation.

The Department wants to ensure a clear, effective selection process which enables good housing management and promotes fairness for all.

Withdrawing an offer of tenancy is a major decision with significant impact for any housing applicant. Provision of a new rule and subsequent criteria will ensure fairness, transparency and consistency of approach. This will be important for both landlords and applicants. This will enhance good housing management practices and contribute to the best use of stock.

A new rule will be developed for approval by the Department which clarifies the circumstances for when an offer may be withdrawn. The rule and any associated guidance will provide clarity on the circumstances in which an offer may be withdrawn, and will aim to address the concerns raised in some consultation responses.

The Housing Executive has indicated that limited system changes are required and therefore this proposal may be taken forward in the short term (in the region of 9-12 months from project commencement).
Proposals 17 & 18 Analysis

Proposal 17
What we asked:
Social landlords may withhold consent for a policy succession or assignment to a general needs social home in limited circumstances where there is evidence an applicant needs it.

There should be a focus on good housing management and better use of public resources by enabling social landlords to make more effective use of general needs stock. Do you agree?

Out of a total of 185 responses, 107 (58%) responded to this proposal

67% Support

Of those who indicated a position on this proposal, almost seven out of ten (67%) agreed with the proposal

Breakdown of respondents who provided a position, by respondent type (%)

Support for this proposal was greater amongst organisations, with 71% in agreement, compared to 62% of members of the public

Note: Due to rounding these totals may not always equal 100
Proposal 18
What we asked:
Social landlords may withhold consent for a policy succession or assignment of adapted accommodation or purpose built wheelchair standard accommodation where there is evidence an applicant needs it.
This proposal should ensure that the most effective use is made of existing adapted stock, and that waiting times for applicants requiring adapted accommodation are reduced. Do you agree?

Out of a total of 185 responses, 111 (60%) responded to this proposal

79% Support

Of those who indicated a position on this proposal, almost four out of five (79%) agreed with the proposal

Breakdown of respondents who provided a position, by respondent type (%)

Support for this proposal was greater amongst organisations, with 83% in agreement, compared to 75% of members of the public.

Note: Due to rounding these totals may not always equal 100
In general, respondents considered and commented on Proposals 17 and 18 together. Feedback has therefore been analysed and presented for both proposals combined.

There was overall support amongst respondents for both these proposals regarding withholding consent for policy successions or assignments in specified circumstances. Almost seven out of ten expressed support for withholding consent for a policy succession or assignment to a general needs social home in limited circumstances where there is evidence an applicant needs it. Almost four out of five respondents supported the proposal to withhold consent for a policy succession or assignment of adapted accommodation or purpose built wheelchair standard accommodation where there is evidence an applicant needs it. Feedback noted that the proposals would make the best use of existing stock in the context of high housing demand. Some respondents highlighted the need for greater transparency, clear processes and guidance, and particularly for clear communication with potential successors/assignees who may be impacted. Respondents emphasised the need for sensitivity when dealing with issues of succession or assignment, given the impact these decisions could have on the potential assignee or successor.

Clear protocols would need to be in place to deal with these circumstances ensuring a consistent approach across all social landlords.

...it is a very sensitive and emotive area and landlords need to carefully deal with this if such a proposal went through.

this is good housing management and puts a finite resource to proper use.
Themes raised by respondents

- The proposals will make the best use of existing stock
- Importance of clear guidance, transparent procedures and a consistent approach to withholding consent
- Sensitivity is required when withholding consent, given the impact this could have on the potential assignee or successor

Respondents noted that the proposals would make the best use of existing stock, particularly against the backdrop of high demand on social housing. Some emphasised that the proposals enabled good housing management, ensuring that the needs of applicants on the waiting list could be met more effectively by, for example, freeing up family homes. In relation to wheelchair standard and adapted properties, respondents stated that the proposal is a sensible approach to respond to the high demand for these properties.

Feedback from respondents

‘...it is important to make the best use of stock, particularly bespoke stock that has been purpose built or adapted. This would also represent value for money by allocating the property to someone who specifically requires this.’

‘wheelchair properties are limited in stock so need to be put to use by those who require specialised accommodation.’

A number of respondents emphasised the importance of clear guidance, transparent procedures and a consistent approach to withholding consent for a policy succession or assignment. Respondents stated that it was important to inform tenants of this provision, especially at the beginning of their tenancy or when adaptations are made to their home. Respondents noted that any rationale for withholding consent must be clearly set out, a mechanism of appeal should be made available and that decisions must be made consistently across all social landlords. Some respondents highlighted the importance of specialised housing advice being available in this context, tailored to the needs of the household.

Feedback from respondents

‘...need for clear communication in respect to the people who lived with a former tenant and who are expecting to be the successors of the tenancy.’

‘There is a need to strengthen advice offered, especially at the outset of a tenancy...’
Respondents stated that sensitivity is required when withholding consent, as some potential assignees or successors could be going through a difficult period, e.g. the death of a family member. Landlords should be mindful of such personal circumstances when dealing with these individuals. Some respondents highlighted the need to take into consideration any other issues that an existing tenant may have, and build in safeguards to ensure that they are rehoused quickly in a suitable property and with a sustainable tenancy.

"Feedback from respondents"

‘...supports the view that social housing should be used in the most appropriate manner to ensure that applicants and tenants are housed in a suitable and sustainable tenancy, we believe that this must be balanced with other considerations of the existing tenants.’

‘It is recognised that... a landlord... needs to make best use of stock. This will be through taking into account in a sensitive manner the specific needs of the applicant requesting a succession or assignment whilst also considering the overall demand for a property in that area.’

Departmental response and next steps

These proposals will proceed as per the consultation.

First and foremost the most vulnerable in our society must be protected and supported with appropriate housing. For this reason there are certain circumstances when policy successions or assignments may not be appropriate.

The Department wants to ensure those in most need have access to suitable housing. This may be an emotive issue therefore it will be important to make applicants and tenants aware of the potential for refusal. The Housing Executive will develop appropriate guidance setting out the very particular situations when this discretion may be exercised.

Subject to the necessary approvals, resourcing, and any required system changes the Housing Executive estimates that these proposals may be taken forward in the short term (in the region of 9–12 months from project commencement).
What we asked:
Updating the Selection Scheme to bring it in line with developments in Public Protection Arrangements Northern Ireland

The Housing Executive requested this change to bring the Selection Scheme in line with recent developments in legislation to enable social landlords to make restrictions to applicants (or a member of their household) who have been convicted or charged with a violent offence. Do you agree?

Out of a total of 185 responses, 109 (59%) responded to this proposal

82% Support

Of those who indicated a position on this proposal, just over four out of five (82%) agreed with the proposal

Support for this proposal was greater amongst members of the public, with 85% in agreement, compared to 78% of organisations

Note: Due to rounding these totals may not always equal 100
Summary of respondents’ views

There was majority support, with just over four out of five respondents in favour of updating the Selection Scheme to bring it in line with developments in Public Protection Arrangements NI (PPANI). Feedback indicated that this sensitive area requires a balanced approach. Respondents highlighted the importance of considering the needs (including safeguards) of applicants, staff and the local community. Of particular note was the belief that partnership working and appropriate information sharing were key to implementing this proposal, with all partners engaging to ensure that the risk posed by offenders is managed appropriately. Some respondents recommended an ongoing review of this process, whilst others reiterated the importance of keeping decision-making around public protection arrangements within the Criminal Justice System.

“I agree with this proposal as it will help achieve a multi-agency approach in the management of sexual and violent offenders and promotes sustainable communities.”

“…what mechanisms, checks and requirements will be in place to ensure equity and fairness.”

“[We] have concerns that this proposal requires housing providers to make decisions that are more appropriately determined by the Criminal Justice System.”
Themes raised by respondents

- Need to consider all involved in the process (applicants, staff and local community)
- Ongoing review is required, given the sensitivities
- Ensure decisions around risk and the ongoing management of offenders remain with the Criminal Justice System

- The need to consider all those involved in the process – this includes applicants, staff and the community. Respondents emphasised that ensuring the safety of all involved was important – lone housing workers, members of the community, and applicants convicted or charged with a relevant offence and their household. Some respondents highlighted that confidentiality of victims and applicants was paramount, and that landlords had a duty of care to all involved. Others expressed the view that information sharing and partnership working (between organisations such as health care professionals and the police amongst others) were vital in this process. Advice and support from other professional bodies is considered crucial to enable housing officers to make informed decisions before allocating properties. This informed decision-making has the potential to create sustainable tenancies and community development.

Feedback from respondents

‘PPANI protocols should provide the safety mechanism to protect the community, but also control information regarding offences to protect the client.’

‘We support appropriate data sharing in order to make the best decision for rehousing of applicants and the sustainability of communities.’

- The need for robust arrangements with adequate protections was highlighted. Some respondents stated that the process should be subject to ongoing review and monitoring to ensure its effectiveness and its fairness. Others focused on the need to provide clarification on the roles undertaken by landlords in the PPANI process. More generally, it was noted that careful consideration of the process is required given the complex nature of the issues involved.

Feedback from respondents

‘...it may be more appropriate to consider this proposal as a stand-alone issue, with detailed consultation occurring with all the relevant parties. It is essential that this sensitive and important issue is considered in detail.’

‘This proposal requires full and proper consideration and consultation...’
Feedback indicated that **decisions around risk and ongoing management of offenders should remain with the Criminal Justice System.** Respondents raised concerns about the process and, in particular, public protection decision-making being taken by a landlord, rather than by professionally trained experts within the Criminal Justice System. Respondents also noted issues around rehabilitation of offenders, and the need to ensure applicants were not discriminated against in this context. Some respondents emphasised that the current processes were sufficiently robust and should remain in place.

**Feedback from respondents**

‘Allowing social landlords to ask housing applicants, at the “application stage” or at any stage, for their criminal/offence status is to allow a non-judicial party to be privy to judicially protected information.’

‘The current arrangements, if delivered appropriately, are robust, proven, and offer enough protections.’

**Departmental response and next steps**

This proposal will proceed as per the consultation.

The Department supports the request from the Housing Executive to bring their processes around public protection into line with current legislation.

The protection of the most vulnerable in our society is paramount. This proposal ensures appropriate offers are made, taking into account both the needs of the individual and wider public protection issues.

The Housing Executive will seek to discuss the arrangements to take forward this proposal with the various agencies involved in managing the risk posed by certain violent and sexual offenders via the current PPANI structure. It is estimated that this proposal can be progressed in the medium term (in the region of 18+ months from project commencement).
Proposal 20 Analysis

What we asked:

Specialised properties should be allocated by a separate process outside the Selection Scheme

Specialised accommodation should go to those who need it most. A review should be established to put a more effective allocation process in place for applicants needing specialised property such as sheltered dwellings/ wheelchair standard accommodation. Do you agree?

Out of a total of 185 responses, 116 (63%) responded to this proposal

91% Support

Of those who indicated a position on this proposal, nine out of ten (91%) agreed with the proposal

Breakdown of respondents who provided a position, by respondent type (%)

Support for this proposal was greater amongst members of the public, with 95% in agreement, compared to 85% of organisations

Note: Due to rounding these totals may not always equal 100
Summary of respondents’ views

An overwhelming majority of respondents, just over nine out of ten, supported the proposal to allocate specialised properties outside the Selection Scheme. This includes taking forward a review to determine how specialised properties should be allocated. Respondents recognised the need to make best use of current stock, allowing homes to be allocated to those most in need, particularly when there is a limited number of specialised properties. Some respondents stated that there should be a clear and consistent approach to these allocations, and some emphasised the need for the proposed review, adding that further consultation on the issue was required. A number of respondents raised a concern that establishing a separate process for specialised properties would result in long term voids.

“...has some concern that the consultation proposal to ring-fence specialised properties into a separate process could result in unnecessary and lengthy void times for (adapted) properties, where demand does not dovetail with supply.”

“...research and modelling would be required to determine an effective alternative for the assessment and allocation of sheltered housing...”

“...these should be ringfenced for individuals who demonstrate appropriate need.”
Themes raised by respondents

- The need to make best use of current stock alongside need for more stock
- The importance of a clear and consistent approach
- A review and further consultation are required
- Partnership working is required, with health organisations in particular
- There is a concern that separating the list will result in long term voids

Respondents noted that there was a need to make best use of current stock alongside the need for more stock. Feedback highlighted the need to keep specialised stock for those who really need them, particularly as this type of housing is in short supply. Allocations should be made appropriately to ensure that accommodation with specialised features is matched to those with specific needs. Some respondents stated that there needed to be greater investment in stock to meet current and future demand.

Feedback from respondents

‘Given the total inadequacy of the social housing supply in NI, where there is specialised accommodation it must be used to its best purpose.’

‘...would recommend that there is a significant increase in the levels of homes adapted to be made accessible for people with a disability and an increase in the provision of sheltered housing.’

Respondents emphasised the importance of a clear and consistent approach to the allocation of these properties, including adequate support mechanisms. Others sought a clear definition of the term ‘specialised’. They felt it was important to establish clear guidance on roles, responsibilities and processes, which is easy for staff and applicants to understand. Respondents stated that applicants should be supported and that the level of support provided should be appropriate to ensure the needs of individuals are met, with some advocating a person-centred approach to allocations. This was deemed particularly important for those with complex needs, to always ensure applicants have the capacity to understand the process.
Feedback from respondents

‘...any new allocation processes should be easily understood.’

‘We strongly advocate a person-centred approach which matches the need of the applicant to the most appropriate accommodation allowing housing options to be tailored to individual circumstances.’

• Respondents were supportive of the proposed review, emphasising the importance of considering existing procedures, identifying gaps to be addressed, and ensuring better use of resources. However some stated that further consultation on any new arrangements was required. Some respondents raised concerns over the inclusion of sheltered properties in the ‘specialised’ category, as doing so may cause confusion about the nature of the service and the level of support provided.

Feedback from respondents

‘We further agree that an independent time-bound review should determine how specialised properties should be allocated.’

‘In order to make best use of our current and proposed specialist stock there has to be holistic approach to managing this. We need a working group from NIHE and associations to work through the procedural end of it...’

• A number of respondents emphasised that partnership working was required in the context of this proposal, with health organisations in particular. Some highlighted the potential for a multi-disciplinary approach to assessment. Greater cohesion and communication between organisations was also considered essential to ensure appropriate allocation of these specialised properties.

Feedback from respondents

‘...specialised properties require a more holistic approach where appropriate external agencies are engaged including health professionals where appropriate. This will ensure that the needs of the most vulnerable applicants are fully taken into account to ensure better use of public resources.’

‘...highlighted the importance of partnership working and the protection of people who are most in need.’
A number of respondents felt that separating the list could result in long term voids. Some felt that narrowing the pool of applicants for certain properties may mean that properties are left vacant, which in turn could mean that general needs applicants are left waiting and landlords lose out on rent.

“Feedback from respondents

‘...narrowing the pool of people we can choose to allocate to would leave us with smaller lists and more longer term voids.’

‘Consideration needs to be given to wheelchair accessible accommodation... where there is no demand for the size of property. How should landlords manage this...’

Departmental response and next steps

This proposal will proceed as per the consultation.

There is a limited supply of specialised properties. This proposal aims to ensure the best use of this scarce resource by ‘ring fencing’ these properties, to help reduce waiting times for those needing specialised properties. These homes are scarce in supply compared to general needs housing and therefore it is essential that, wherever possible, they are prioritised for those who need them most, ensuring the best use of stock and public resources.

Careful consideration needs to be given as to how specialised properties should be allocated. The Housing Executive will initiate a sector-led review prior to any implementation. It is not yet known what changes may be involved for applicants or for current systems and procedures as these would be dependent on the outcome of the review. The review aims to identify an improved system for the most vulnerable applicants, ensuring greater access to, and availability of, good quality homes for them.

Subject to approvals, budget and resourcing, the Housing Executive estimates that this proposal may be brought forward in the long term (24+ months from project commencement).
Annex A - Consultation process

Social media and online activity

- Emails issued to a wide range of stakeholders (e.g. voluntary/community groups, local councils, political parties, MLAs) publicising the consultation – issued in English and Irish
- All consultation documents and other related information published on consultation webpage:
  - Press release
  - Presentation from public consultation events
  - Consultation information leaflet
  - Consultation document
  - Easy Read consultation document
  - Draft Equality Impact Assessment
  - Review of social housing allocations policy screening and annexes
  - Rural Needs Impact Assessment
  - Social Inclusion Impact Assessment
  - Analytical Research Paper: Social Housing Waiting List (authored by DfC’s Analytical Services Unit)
  - Analysis of Analytical Services Unit Research
  - Examples of social housing allocations in Great Britain: A snapshot from 2014
  - 5500 plus hits on the consultation webpage

- Comprehensive social media plan
- Over 60 tweets
- Infographics circulated via Departmental Twitter account:
  - Highlighting consultation launch and deadlines for response
  - Promoting public consultation events across Northern Ireland
- Articles published on NI Departments’ intranets

Stakeholder engagement

- Presentation to Assembly All Party Group on housing in advance of consultation launch
- Highlighting consultation launch to housing sector at Northern Ireland Federation of Housing Associations (NIFHA) conference on launch day
- Five public events across Northern Ireland, attended by over 160 people:
  - Belfast Central Mission, 17 October 2017
  - City Hotel, Derry/Londonderry, 13 November 2017
  - Omagh Enterprise Centre, 15 November 2017
  - NICVA, Belfast, 21 November 2017
  - Craigavon Civic Centre, 24 November 2017
• 13 presentations to smaller stakeholder groups, attended by over 230 people:
  - Assembly All Party Group on Housing, 26 September 2017
  - Housing Council, 11 October 2017
  - Supporting Communities Housing Policy Panel, 23 October 2017
  - Housing Executive Senior Managers, 7 November 2017
  - Housing Central Forum, 8 November 2017
  - Disability Forum, 9 November 2017
  - Housing Rights Practitioners, 14 November 2017
  - West Belfast Partnership, 16 November 2017
  - Mid Ulster District Council, 22 November 2017
  - Northern Ireland Federation of Housing Associations, 29 November 2017
  - Housing Rights Champions for the Black and Ethnic Minority Community, 30 November 2017
  - Housing Rights, 6 December 2017
  - Clanmil Tenant Forum, 7 December 2017

• Mailshot to all applicants on the waiting list (over 51,000 households)
  - a letter from the Housing Executive drawing attention to the consultation and a leaflet providing details of public consultation events

**Publications**

• Press release
• Media brief in advance of consultation launch
• Advertisements placed in regional newspapers
• Materials distributed at consultation events, via Housing Executive and Housing Association local offices and libraries across NI:
  - Leaflets
  - Posters
  - Hard copies of the full consultation document, the EQIA and Easy Read

**Accessibility**

• Easy Read online version
• Hard copy versions of Easy Read made available at all public consultation events, and provided directly to consultees on request
• Large print copies provided on request
• Translated copies provided on request
• Electronic notetaker made available at public consultation event

Sample of infographics used on social media to publicise the consultation:
Annex B - Full list of respondents

Action for Children
Advice NI
Apex
Ards & North Down Borough Council
British Red Cross
Central Housing Forum
Council for the Homeless NI
Choice
Choice Tenants’ Forum
Chartered Institute of Housing NI
Citizens Advice
Clanmil
Community Relations Council
Connswater Homes
Co-ownership Housing
Did not specify - 4
Disability Action and NIHE Disability Forum
Drumcree Community Trust
East Belfast Community Development Agency
Equality Commission
Fermanagh and Omagh District Council
First Housing
Green Party
Housing Council
Housing Policy Panel
Housing Rights
Housing students – 50
Jim Shannon MP
Law Centre NI
Members of the public – 63
Mencap

Mid Ulster District Council
Migrant Centre NI
NI Association for the Care and Resettlement of Offenders
NI Federation of Housing Associations
NI Local Government Association
NI Public Service Alliance
Northern Ireland Housing Executive
Northern Ireland Human Rights Commission
Organisation unknown – 13
Participation and the Practice of Rights
Praxis Care
Radius
Rural Community Network
Shelter NI
Simon Community
Sinn Féin
Social Democratic and Labour Party
South and East Belfast Housing Community Network
Supporting Communities Staff
The Royal College of Psychiatrists
Ulster Unionist Party
Voice of Young People in Care
WAVE Trauma Centre
West Belfast & Shankill Housing Community Network
West Belfast Partnership Board
Women’s Aid
Women’s Regional Consortium
Workers Party
Annex C - Unclear responses – broken down by proposal

Many respondents provided written responses and did not always clearly indicate one of the requested preferences (i.e. “agree”, “disagree” or “don’t mind”). In these cases a consensus view was sought by the consultation team. To do this, each response was examined with a view to establishing whether the respondent had expressed a preference. Where this was not the case, the response was coded as “unclear”.

<table>
<thead>
<tr>
<th>Proposal</th>
<th>Consensus reached</th>
<th>Unclear responses</th>
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Annex D - Likely Timescales for Implementation Phases

The Department has asked the Housing Executive to proceed to present plans to implement 18 of the 20 consultation proposals. The remaining two proposals will not proceed as per the consultation and will require further analysis in order to provide alternatives.

<table>
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<tr>
<th>Phase 1 (9-12 months from project commencement)</th>
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<tr>
<td>Proposal 1 – Housing advice service</td>
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<td>Proposal 5 - Greater choice of areas for applicants (from 2 to as many as they wish)</td>
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<td>Proposal 6 - Greater use of a mutual exchange service</td>
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<td>For difficult-to-let properties:</td>
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<td>Proposal 12 - make multiple offers to as many applicants as they think necessary and</td>
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<td>Proposal 14 - go direct to multiple offers if there is evidence that a property will be difficult to let</td>
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<td>Proposal 15 - An applicant may receive two reasonable offers of accommodation</td>
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<td>Proposal 16 - Social landlords may withdraw an offer of accommodation in specified circumstances</td>
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<td>Withhold consent for a policy succession or assignment:</td>
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<td>Proposal 17 - to a general needs social home and</td>
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<td>Proposal 18 - of adapted accommodation or purpose built wheelchair standard accommodation</td>
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### Phase 2 (18+ months from project commencement)

| Proposal 2 | An applicant who has been involved in unacceptable behaviour should not be eligible for social housing or Full Duty homelessness status unless there is reason to believe – at the time the application is considered – that the unacceptable behaviour is likely to cease |
| Proposal 3 | The Housing Executive may treat a person as ineligible for Full Duty homelessness status on the basis of their unacceptable behaviour at any time before allocating that person a social home |
| Proposal 8 | Points should reflect current circumstances for all applicants |
| Proposal 11 | Selection Scheme should generally align the number of bedrooms a household is assessed to need with the size criteria for eligible Universal Credit customers (housing cost element) |
| Proposal 19 | Updating the Selection Scheme to bring it in line with developments in Public Protection Arrangements Northern Ireland |

### Phase 3 (24+ months from project commencement)

| Proposal 4 | The Housing Executive can meet its duty to homeless applicants on a tenure-neutral basis, provided that the accommodation meets certain conditions |
| Proposal 7 | Further consideration of intimidation points within the Selection Scheme |
| Proposal 9 | Further consideration of interim accommodation points within the Selection Scheme |
| Proposal 10 | The Selection Scheme should place applicants into bands based on similar levels of need to meet longstanding housing need more effectively |
| Proposal 13 | For difficult-to-let properties: Social landlords should be able to use choice-based lettings |
| Proposal 20 | Specialised properties should be allocated by a separate process outside the Selection Scheme |

**Key:** 
- Approval to proceed
- Further work required