Research to inform a fundamental review of social housing allocations policy

Report 1: Current approaches to accessing and allocating social housing in Northern Ireland

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The research team would like to thank all the stakeholders, particularly those from the Northern Ireland Housing Executive, who gave up their time to discuss allocation policy and practice as part of this review.
# RESEARCH TO INFORM A FUNDAMENTAL REVIEW OF ALLOCATIONS POLICY

## REPORT 1: CURRENT APPROACHES TO ACCESSING AND ALLOCATING SOCIAL HOUSING IN NORTHERN IRELAND

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GLOSSARY OF ABBREVIATIONS

CBL Choice-Based Lettings
CLA Common Landlord Area
CORE Continuous Recording of Lettings and Sales
DSD Department for Social Development
FDA Full Duty Applicant/Full Duty Application, under Housing (NI) Order, 1988
GHA General Housing Area
HSS Housing Selection Scheme
LHA Local Housing Allowance
NICORE Northern Irish Continuous Recording of Lettings and Sales
NIHE Northern Ireland Housing Executive
PSNI Police Service of Northern Ireland
PRS Private Rented Sector
INTRODUCTION

This report describes and analyses the way in which social housing is accessed and allocated in Northern Ireland today. It is one of two source documents which provide the evidence base to underpin the final report and recommendations undertaken jointly by the Universities of Cambridge and Ulster in 2012-13 to support the Department for Social Development’s Fundamental Review of Social Housing Allocations. This report draws together findings from analysis of existing data, a policy and literature review and a series of interviews and focus groups which were held with key stakeholders within the housing sector in Northern Ireland. These included representatives from the Northern Ireland Housing Executive (NIHE), housing associations, tenant representatives and advice and advocacy groups. The research also sought opinion from the five main political parties in Northern Ireland. A full list of stakeholders consulted is given in Annex 1.

Stakeholders were asked their views on the operation of the current Housing Selection Scheme (HSS\(^1\)) and how it might be improved, and also how and whether wider government policy objectives could be addressed within a housing allocation scheme in Northern Ireland.

A FUNDAMENTAL REVIEW

Stakeholders were emphatically in favour of the need for a fundamental review, making comments such as: “It is the right time for a fundamental change – it is not fit for purpose for today”. All stakeholders were clear that this review needed to be fundamental in that it should not simply consider the difficulties within the current system and seek to “fix” these. Whilst this was recognised as a core part of the process, many stakeholders were clear that the review needed to be much more comprehensive: “We need to completely look at the system now. It needs to be fundamental, as in not tinkering with the scheme; we need to start with a blank sheet”. The political context that is somewhat unique to Northern Ireland also formed part of the issues raised and whilst there was agreement over the need to understand the political climate the argument was made that this must not hinder progress: “If we want a better system, we need to be brave”.

It was commonly agreed that until fundamental and challenging questions were answered and the founding principles of the scheme established it was not possible to effectively

\(^1\) The actual title is the “House Allocation Scheme” under the Housing (NI) Order 1981, Article 22. For the purposes of this research we shall refer to it as the Housing Selection Scheme.
explore and come to a decision on what the shape, form and content of the future system of allocating social housing in Northern Ireland should be. There was a general view that the following questions need to be addressed and the best way to approach this is to begin with a blank sheet and decide:

✓ What is the purpose of social housing?
✓ What does social housing mean in Northern Ireland?
✓ What should the fundamental principles of the scheme be?
✓ What, and for whom, is social housing for?
  o Is it simply to address acute housing need and provide a safety net for those unable to access other sectors for a variety of reasons, or is it to create more vibrant communities? These goals do not always sit easily together.
  o Should we be housing those in greatest need such as those who are homeless under the current system or should we be giving more priority to those in employment to work towards more balanced communities?
✓ What wider housing policy objectives need to be accommodated within the scheme, such as the creation of sustainable communities or integrated housing?

As one stakeholder argued:

“We need to think about what is the outcome? What is the end goal? Unless you know where you are trying to get to and what your final objective is, it is hard to know what to do to get there. Now is the time to make radical change”.

The clear message from the sector was that the review has to be fundamental. It must address real and difficult issues if we are to truly devise a responsive allocation scheme that reflects local circumstances and can be used in the short, medium and longer terms.
KEY DRIVERS FOR A REVIEW

A number of the key drivers for the timeliness of the review were identified by stakeholders as being of importance. These include:

WELFARE REFORM

The Welfare Reform Bill for Northern Ireland was formally introduced to the Assembly on 1 October 2012. The changing policy and welfare landscape is set to create the need to do more with less. Reform measures ranging from caps on the maximum benefit claimable per household to changes in disability support payments are likely to bring real reductions in disposable income for those on benefits. The most important change facing the social housing sector is the cut to Housing Benefit for tenants of working age deemed to be under-occupying their home, in accordance with the Social Sector Size Criteria. This will mean a challenging time for benefit recipients and housing providers alike.

Welfare reform was seen by stakeholders as one of the most pressing issues in relation to the need to review the current system. The NIHE (2012a) has already carried out a consultation on the changes that might be required to facilitate any impact the reforms may have. The full ramifications of the reforms on the housing sector are, as yet, unclear. However, one immediate priority is the need for housing providers to make “… careful allocation of applicable homes to applicable people…[we] need to make sure that we are not building in more problems for landlords and tenants in the future.”

CHANGING TIMES, MANAGING RISK

Social housing providers are now operating in an increasingly challenging economic and financial context in Northern Ireland, and stakeholders are well aware of this. Housing associations are more acutely affected as the sole developers of new social housing. In addition to welfare reform, the sector faces new financial challenges and increased risk as a result of cuts to Supporting People budgets and the Special Needs Management Allowance. There are additional challenges in relation to the availability of private finance as well as the escalating costs of borrowing. It was noted that housing associations increasingly have to adopt lean business models in order to be able to secure “robust revenue streams”.

On 9 January 2013 the Minister for Social Development announced plans for the reform of the NIHE in order to “… create effective structures for the social housing sector that will put in place a sustainable housing system fit for the 21st Century”. The proposals include the establishment of a Regional Housing Body and a new landlord function. One of the challenges in establishing these new organisations will be where to place and how to deal with the allocation of social housing, particularly as the NIHE was established against a
backdrop of claims of discrimination in the allocation practices of some local councils at the time. Indeed, there has never been a legal case upheld against the NIHE on the grounds of religious discrimination in the allocation of social housing.
Allocation and lettings are key tasks for housing organisations. In Northern Ireland, allegations from the civil rights movement of discrimination in housing allocations and the findings of the Cameron Commission led to the allocation of social housing coming under increased scrutiny in the late 1960s and early 1970s. According to Whyte (1983), before 1945 “there were few allegations of discrimination in the allocation of public housing because there was little public housing to allocate”; however, “...as public housing became more plentiful, so complaints about its allocation multiplied” (p16).

ESTABLISHMENT OF THE NORTHERN IRELAND HOUSING EXECUTIVE AND THE HOUSING SELECTION SCHEME

The Housing Executive Act (Northern Ireland) 1971 established the NIHE, which was to manage all public housing in Northern Ireland. When the NIHE was formed in October 1971, it absorbed the Northern Ireland Housing Trust and the housing functions of local authorities and a number of other bodies. It was established against a background of civil unrest and poor housing conditions (Gray, 1994).

The origins of the NIHE’s Housing Selection Scheme (HSS) lie in the few years prior to the founding of the NIHE. Following the report of the Cameron Commission in 1969, the Ministry of Development in Northern Ireland drew up a model allocation scheme which was adopted by the then Northern Ireland Housing Trust (Smith and Chambers, 1989).

This model allocation scheme was adopted by the new NIHE. The scheme identified six categories of housing need, and each application for housing was assessed according to specified objective criteria. These were: those in emergency accommodation; overcrowded households; households needing to move for redevelopment or living in unfit housing; households who have spent the most time on the waiting list; those with a medical need to move; and ex-service personnel. It has been argued (Paris, 2008) that by taking housing functions away from local councils the 1971 reforms effectively de-politicised housing allocation and removed councils from the politics of housing provision. Since then the NIHE has established a reputation for absolute fairness in allocation and treatment of all applicants, regardless of their religion or ethnic origin (Gray and Campbell, 2001).

In the next two years a new allocation scheme was devised and this was introduced in stages during 1973. It was universally applied from 1 January 1974. It was a unitary points scheme in which applicants were assessed against a range of factors including lack of amenities, family support, overcrowding, local preference, sharing, ex-service personnel, disrepair, under-occupation, elderly, hostel residency and time on list (ibid).
The Housing Executive devolved responsibility for allocations to local housing managers, in order to balance differing demands (such as dealing with sudden increases in priority need, new applications and ensuring that the changing needs of existing tenants are met) within the context of a unitary Northern Ireland-wide allocation scheme (Smith and Chambers, 1989).

**REVIEW AND THE INTRODUCTION OF BANDS**

The first major review of the new scheme took place shortly afterwards, in 1975-76, and resulted in a revised points system from October 1977, which gave higher priority to applicants expressing a local preference. It also introduced banding into the system with two principal groups of applicants: Group A for “non-pointed” priority cases, and Group B for “pointed” cases.

In Group A there were four priority groups:

- A1 Emergency housing requirements – which included homeless people and the exceptional priority given to A1(I) cases who were victims of intimidation
- A2 Special health and social needs
- A3 Required to move because of vesting order, closure or redevelopment
- A4 Key workers

Applicants who were placed in these groups were not allocated points but were given preference on the list above other applicants. Within each of these groups priority was determined by date order.

The remaining three groups, the “B” Groups, were housed on the basis of points:

- B1 General housing list
- B2 Elderly persons
- B3 Elderly persons in need of warden supervised accommodation.

Between 1977 and 1985 some 25 fine-tuning amendments were made to the scheme, but the overall structure of the pointing system remained intact until 1988.

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2 “Intimidation” covers racial or sectarian attack, hostility because of an individual’s disability or sexual orientation, or attack by a person who falls within the scope of the NIHE’s powers to address anti-social behaviour.
The Housing (NI) Order 1981, Article 22 established the statutory framework for the HSS. Article 22 requires the NIHE to prepare and submit an allocation scheme to the Department for Social Development which the NIHE must also comply with. Article 22A, amended by the Housing (NI) Order 2003, provided the legal grounds for eligibility under the scheme. This included the legislative context when assessing eligibility for applicants from abroad (s. 118 Immigration and Asylum Act, 1999).

A major review was subsequently carried out in 1988 in preparation for the legislative changes brought about by the homelessness legislation which was introduced under the Housing (NI) Order 1988. As from 1 April 1989, the NIHE assumed responsibility for certain homeless persons. At the same time the NIHE’s Board agreed that formal reviews of the scheme would not take place on a planned cycle, but rather as the need arose.

**HOUSING (NI) ORDER 1988 – STATUTORY HOMELESSNESS**

Until the introduction of the Housing (NI) Order 1988, Article 22, no public body in Northern Ireland had a statutory duty to provide emergency or temporary accommodation to those in need of it, although Area Health and Social Services Boards had a discretionary power to provide such accommodation under the Health and Personal Social Services (NI) Order 1972. Before the Housing (NI) Order 1988, the NIHE had a duty to allocate dwellings to homeless persons only if they were available. If no such accommodation was, or became, available then there was no further duty to provide even temporary accommodation.

The 1988 Order placed a statutory duty on the NIHE to provide temporary and / or permanent accommodation for specified groups of homeless persons, depending upon the assessment of each applicant’s circumstances. Those who satisfied tests including eligibility, being homeless, being in priority need and being unintentionally homeless, are considered to have Full Duty Application (FDA) status as they have met all the statutory criteria as defined by the legislation. Should an applicant be found not to have FDA status, the NIHE is legally required to provide advice and assistance.

Applicants accepted as homeless were placed in the A1 category. However, over the next ten years, the proportion of those in the A groups increased from 14 percent to 32 percent and the number of applicants contained within the A1 grouping rose from 619 to 2,777 (Gray and Campbell, 2001). This, along with the changing nature of the waiting list, had caused concern locally as there was growing evidence of an increasing number of singles, and more and more households were being housed through the priority groups only, where there was no differentiation of need or circumstances and allocations were being made purely on a date basis.
1995 WORKING GROUP

In January 1995, the Housing Executive’s Board set up a Working Group to review the selection scheme. This was driven by a number of factors: legislative changes; recommendations from government and other working groups and reviews; the changes in the waiting list and applicant profile; and Policy Appraisal and Fair Treatment Analysis. In 1996 the Department of the Environment Northern Ireland, which at that time had the responsibility for housing, published its Housing Policy Review.

COMMON WAITING LIST

In March 1997, a Common Waiting List for both the NIHE and housing associations was established. The government’s Housing Policy Review required the development of a new Common Selection Scheme for the assessment of all applicants for social housing “which is fair and equitable in terms of access to the Scheme, assessment of applicants and allocation of accommodation”.

The most fundamental change proposed in the Review was a move from a scheme under which a significant number of applicants fall into priority groups to a predominantly points-based scheme. At the outset it was envisaged that a more comprehensive points system should be developed to rank the growing number of applicants on the general waiting list according to their specific circumstances and needs. In moving to a predominantly points-based scheme the assessment criteria were considered more objective and sensitive to individual needs. The Review also sought to measure the competing needs of applicants and their varying characteristics more sensitively through distinguishing between those applicants:

- In exceptional need
- Who occupy insecure accommodation
- Affected by conditions such as overcrowding and lack of amenities
- With health and social well-being conditions.

One of the primary reasons for the move was the increasing proportion of allocations made to A1 applicants. Prior to the introduction of the 1988 Homeless legislation this group included those who lost their homes through fire, flood, marital breakdown, civil unrest or intimidation, as well as care leavers.

Further to the establishment of the Common Waiting List, the NIHE and housing associations began to operate from a common selection scheme in November 2000. The
HSS was entirely points-based but with a distinctive separate administrative category for “complex needs” or applications requiring more specialised accommodation with support services. More objective assessment criteria were designed to reflect individuals’ needs and also to measure the competing needs of applicants and their different characteristics in a more sensitive way. Points were to be awarded under four assessment categories: intimidation, insecurity of tenure, housing conditions and health and social well-being. Urgent Need was to be renamed Housing Stress and defined on the basis of whether an applicant had 30 or more points. The new scheme also retained the existing priority given to those who were victims of sectarian, racial or terrorist intimidation by giving them 200 points and thereby priority over almost all other applicants in order to facilitate immediate rehousing.

Existing tenants who wished to transfer were also subject to a points-based assessment and a rule of thumb when making allocations to transfer applicants was a ratio of one transfer allocation for every two waiting list allocations. Social housing providers also had the facility to use a management transfer mechanism for existing cases. Management transfers provided discretion to transfer tenants, under specified circumstances, without reference to their points status, principally to facilitate the best use of stock, i.e. good housing management.

2011 CONSULTATION

By 2011 the HSS had been in place for more than ten years. Following joint work with the Department for Social Development, the NIHE took the opportunity to consult with key stakeholders on a number of key areas in a move to modernise the scheme (NIHE, 2011). The consultation identified four areas of the allocations scheme that had the potential for modernisation:

✓ The recognition given to intimidation
✓ The recognition given to homeless applicants in temporary accommodation
✓ The recognition given to unsuitable accommodation circumstances
✓ Access to transfers for tenants with a history of anti-social behaviour

The Consultation proposals were supported but it was determined that a more fundamental review of social housing allocations in Northern Ireland was required. This research is the first stage of this fundamental review.
THE CURRENT SCHEME

STATUTORY DUTIES

Under the current allocation scheme in operation in Northern Ireland the NIHE has to work within several core pieces of legislation, which together contain a number of statutory duties, briefly outlined below:

✓ Housing (NI) Order 1981
  
  o Article 22 sets out that the NIHE both prepare and submit an allocation scheme to the Department for Social Development for the allocation of housing and that the NIHE must also comply with the rules of the prescribed scheme.

  o Article 22A provides that the NIHE shall allocate homes only to those deemed to be eligible under the legislation (amendment made by Housing (NI) Order 2003). The legislation states that the NIHE shall not allocate housing accommodation:
    
    (a) to a person from abroad, if he is a person subject to immigration control who is ineligible for an allocation of housing accommodation by virtue of section 118 of the Immigration and Asylum Act 1999 (c. 33);
    
    (b) to any other person from abroad, if he is a person who is ineligible for such an allocation by virtue of regulations made under paragraph (3);
    
    (c) to a person who the Executive has decided is to be treated as ineligible for such an allocation by virtue of paragraph (6); or
    
    (d) to two or more persons jointly if any of them is a person mentioned in sub-paragraph (a), (b) or (c).

✓ Housing (NI) Order 1983
  
  o Article 39 provides that the NIHE must publish a summary of the rules of the allocation scheme.

  o Article 40 requires the NIHE to carry out consultation on housing management issues which affect tenants. This would include those surrounding the allocation of homes.
Housing (NI) Order 1988

- Articles 3-17 of the Housing (NI) Order 1988 impose obligations on the NIHE to secure accommodation for homeless persons:
  - by making available suitable accommodation held by it, or
  - by securing that he obtains suitable accommodation from some other person, or
  - by giving him such advice and assistance as will secure that he obtains suitable accommodation from some other person.

- Article 29 requires the NIHE to have a Scheme for the Purchase of Evacuated Dwellings.

Housing (NI) Order 2003:

- Makes amendments to Housing (NI) Order 1981 in relation to eligibility (see discussion on the 1981 Order above)
- Article 27A requires the NIHE to develop a policy and procedures in relation to anti-social behaviour.

UNDERPINNING PRINCIPLES

A range of principles have underpinned the selection scheme since its outset:

- Greatest housing need: it is based on the fundamental principle that the assessment and prioritisation of applicants and allocation of accommodation are undertaken on the basis of housing need.

- Fairness and equity: the Housing Executive adheres to the principle of fairness and equity in the allocation of its accommodation.

- Access: The scheme is operated on the basis of accessibility with minimal barriers to entry.

- Openness: The Housing Executive aims to provide clear information on the scheme and in particular in how assessment and allocation is carried out.
✓ **Value for money:** The selection scheme runs in tandem with a transfer and exchange policy to ensure that rehousing opportunities are maximised and effective household/dwelling mix is achieved.

✓ **Choice:** People should have a reasonable freedom of choice of where they wish to live.

✓ **Consistency:** The selection scheme is applied consistently to all applicants.

The overriding principle is that the selection scheme is based on the assessment of housing need (NIHE, 1998).

Smith and Chambers (1989) outlined the main principles that underpinned the housing allocation scheme and the context in which it operated. They highlight that, given the controversies surrounding the allocation of social housing by local authorities, the NIHE had to pay close attention to achieving a fair and equitable housing selection system for Northern Ireland. They point out that, significantly, the NIHE has never been found guilty of political or religious discrimination in allocations. Smith and Chambers (1989) state that the housing allocation scheme had a high standing amongst housing professionals, citing Singleton’s (1985) paper which concluded that the NIHE scheme measured up to the Housing Services Advisory Group’s model of best practice.

The NIHE (2011, p5) summarised the purpose of the HSS today as being:

> “...first and foremost a tool for assessing and ranking the need of individual households who apply for social housing in Northern Ireland and allocating homes on the basis of that assessed need and ranking. In addition, tenants who wish to transfer within their landlord’s stock or across the pool of social housing are also assessed and ranked as applicants under the rules of the Housing Selection Scheme. The Scheme provides for the award of points to applicants for housing need factors such as insecurity of tenure, housing conditions, and health/social well-being, with the overall accumulation of points determining the position and ranking of an applicant on the waiting list”.

**PROGRAMME FOR GOVERNMENT 2011-2015**

The Programme for Government 2011-2015 (Northern Ireland Executive, 2012) is clear in its direction in relation to the achievement of its aim of building “a shared and better future for all” (p14). The current guiding priorities of the Programme for Government 2011-2015 comprise:
1. Growing a sustainable economy and investing in the future

2. Creating opportunities, tackling disadvantage and improving health and well-being

3. Protecting our people, the environment and creating safer communities

4. Building a strong and shared community

5. Delivering high quality and efficient public services

Any new system must be mindful of the Programme for Government 2011-2015 whilst also remembering that priorities may change over time. A flexible and robust allocation system can play a role in tackling disadvantage and can also contribute, in particular, to building strong communities, shared communities, contributing to the local economy and to the more efficient use of public resources.

THE HOUSING STRATEGY

The Housing Strategy (DSD, 2012) sets out a vision for housing in Northern Ireland over a period of five years across the five themes of:

✓ Ensuring access to decent, affordable, sustainable homes across all tenures

✓ Meeting housing needs and supporting the most vulnerable

✓ Housing and welfare reform

✓ Driving regeneration and sustaining communities through housing

✓ Getting the structures right.

The Programme for Government 2011-2015 also sets out the key objectives of:

✓ Supporting economic recovery

✓ The creation of employment

✓ Community regeneration.

Meeting these priorities will involve new delivery challenges, thinking and acting differently, new and innovative approaches to delivery objectives and new ways of working together. The Strategy specifically mentions social housing allocations policy, and links to the need for a fundamental review to ensure that scarce public resources are used effectively. This is particularly important, given that as of 1 January 2013 there were 41,870
households on the waiting list for social housing, of which 22,675 were assessed as being in housing stress. The Strategy also seeks to “further develop proposals to support shared communities” (p44).

**A SHARED FUTURE: TOGETHER BUILDING A UNITED COMMUNITY**

The NIHE (1973, p18) has always taken a pragmatic approach to the question of residential segregation:

“The Executive does not believe that forced integration is any more desirable than a policy of deliberate segregation. We can only hope that the provision of an attractive mixture of housing and a change of the socio-political as well as the physical environment may ease the problem of polarisation by encouraging and enabling families who wish to live in integrated communities to do so”.

*A Shared Future: The Policy and Strategy Framework for Good Relations in Northern Ireland*, published by the Office of the First Minister and Deputy First Minister in 2005, stated that the highly segregated nature of social housing is unsustainable, both morally and economically, and highlights the importance of developing and supporting mixed housing.

*A Shared Future* acknowledged how government, since 1998, has been committed to exploring ways of providing mixed housing and stated that the NIHE is committed to promoting mixed housing where it is practical, desirable and safe (paragraph 2.5.1). However, the NIHE allocates properties within the principle of housing need as this is the basis of the HSS. Under Section 75(1) of the Northern Ireland Act 1998, the NIHE “shall have due regard to the need to promote equality of opportunity between:

(a) persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;

(b) men and women generally;

(c) persons with a disability and persons without; and

(d) persons with dependants and persons without”.

Section 75(2) of the Northern Ireland Act 1998 also states “without prejudice to this obligation, Public Authorities are also required to have regard to the desirability of
promoting good relations between persons of different religious belief, political opinion, and racial group”.

According to the NIHE (2012b p8) there are legislative barriers to allocations based on religious mix. Section 76 of the Northern Ireland Act 1998 makes it unlawful for a public authority (such as the NIHE) to discriminate, or to aid another person to discriminate, against a person, or a class of persons, on the grounds of religious belief. Legislative change, in terms of an exception from the relevant discrimination legislation for the purpose of explicitly authorising mixed estates allocations schemes, would be required to permit a statutory scheme for allocations giving preference or priority for housing effectively on the basis of an applicant’s religion including for the purpose of the promotion and establishment of integrated housing and thereby an integrated society (NIHE, 2012b p8).

TOGETHER: BUILDING A UNITED COMMUNITY (2013)

The importance placed on the “shared” agenda in relation to housing has recently been given renewed emphasis with the statement made by the First Minister and Deputy First Minister in May 2013 when they announced plans which have been argued to reflect “the Executive’s commitment to improving community relations and continuing the journey towards a more united and shared society”3. The good relations strategy Together: Building a United Community (OFMDFM, 2013), published on 23 May 2013, is referred to as a “key building block in the implementation of the Programme for Government 2011-2015” (p1). The strategy has five key strands, one of which is housing. As part of the proposals relating to housing, the Minister for Housing will bring forward proposals for the creation of ten new Shared Neighbourhood Housing Developments coupled with an “overarching review of housing to bring forward recommendations on how to enhance shared neighbourhoods” (OFMDFM, 2013, p27). Additional proposals within the Strategy which refer to shared space and living include the Interface Barrier Project, which sets out a ten-year plan to work with local communities to reduce and subsequently eliminate interface barriers (OFMDFM, 2013 p27).

CREATING MIXED AND BALANCED COMMUNITIES

As strategic governmental policy focuses on the development of sustainable communities, it is important to understand the elements and evolution of a “balanced community” (in terms of social/religious mix, income mix or tenure mix), which is conducive to the further development, over time, of a sustainable community. In brief, if the building of a sustainable community is the long-term policy goal, then the creation of a balanced community within

this evolutionary process will form the essential foundation to the achievement of long-term sustainability.

Berube (2005) highlighted the fact that a balanced community is open to a number of different interpretations: it may mean a blend of household types, ages, ethnicities, dwelling types, income or tenures. Tunstall and Fenton (2007) developed this point further, referring to a number of dimensions of social mix that have been researched and that policy has tried to affect, including income, employment status, age, ethnicity and household type (such as size and whether the household has children). However, when policy makers today refer to balanced/mixed communities they are increasingly referring to a mix of tenures, which they tend to equate with a mix of incomes. As Bailey et al (2006, p16) noted, “much government policy tends to conflate income and tenure and assumes that by achieving mixed tenure, a range of incomes will also be represented in any particular development” (p18).

The intention is that the introduction of better-off households into an area will bring benefits to lower-income residents: not just in terms of physical renewal but by producing a better area reputation, more shops and services, less crime, schools with more balanced intakes, aspirational peer groups for young people, and broader social networks for adults. The belief is that creating a balanced community through increasing the numbers of better-off households will encourage residential stability, and as the area improves and more economically active people move into the area, so the cycle will continue (Berube 2005).

Evidence has been gathered in various jurisdictions about what constitutes a mixed development, why mixing is considered to have merit and how mix is thought to contribute to long-term sustainability. As Tunstall and Fenton (2007) have pointed out, the issue is complex and multi-faceted:

“\textit{In the last ten years, a substantial body of research has emerged on mix, its effects and means to create it. This research finds that a variety of types of housing and social mix are being pursued. The reasons for pursuing mix vary widely, and include:}

\begin{itemize}
\item \textit{delivering social housing};
\item \textit{meeting other social policy goals}; and
\item \textit{principled opposition to division between different types of people}.
\end{itemize}

There has been considerable emphasis on the sustainable communities’ agenda in Britain in recent years and much of the published research and evaluation work concentrates on experiences in England.
The social housing stock in Northern Ireland comprises some 117,400 dwellings, or 16.6 percent of the total housing stock. Three quarters of all social housing (89,100 dwellings) is owned by the NIHE, with the remainder (28,300 dwellings) owned by housing associations.

Housing pressures in Northern Ireland are significant. There are currently 41,871 households on the waiting list for social housing, and a further 10,180 on the transfer list (Tables 1-2, Annex 2). Overall, approximately one-fifth of households on the waiting list are transfer applicants looking to move within the social sector (Tables 1 and 2, Annex 2).

Both lists are divided between those in housing stress (i.e. those with 30 points or more) and those who are not deemed to be in housing stress (i.e. with less than 30 points). Just over half (54 percent) of applicants had more than 30, while one in five (21 percent) had over 100 points, and 19 percent had no points at all. Among transfer applicants, less than half (45 percent) had more than 30 points, just over one in ten (12 percent) had more than 100 points, and one in ten (11 percent) had no points at all. New applicants were therefore twice as likely as transfer applicants to have over 100 points, but also twice as likely to have no points at all.

This suggests that some people may be registering even though they are not currently in housing need, although these comprise less than a fifth of all applicants. Of those with 30 points and under, therefore not in housing stress, the most common household type is single person households (Table 1, Annex 2).

A total of 11,701 properties were allocated in 2012 (Table 3, Annex 2), of which just over a quarter (27 percent) were of one-bedroom properties, and 43 percent had two bedrooms (Table 6, Annex 2). Transfer applicants formed 29 percent of all lettings. The HSS rules (Rule 72) set a target that there should be a ratio of one transfer allocation to every two allocations to new applicants on the waiting list.

Overall, 4,459 of the total 6,575 lettings into NIHE stock (68 percent) were made to homeless households owed a full homelessness duty (Tables 9 and 10, Annex 2). Of lets to housing association stock, 1,312 were owed a full homelessness duty (which accounted for 49 percent of all new tenants). This suggests that overall more than 60 percent of new lets
are made to previously homeless households. This is a much higher proportion of new lets in comparison to England, where the equivalent figure is just 16 percent (source: CORE).

This suggests that a large proportion of housing applicants in Northern Ireland are being assisted via the homelessness route in order to be rehoused. This seems to be occurring despite the fact that homelessness legislation and housing allocations policy are two separate issues. A number of stakeholders reported that housing officers often feel they have no option but to assess households as homeless in order to get them housed quickly in cases where their current accommodation is simply very unsuitable for them— for instance in cases of elderly people whose home is no longer suitable for them due to mobility difficulties. This was reported as sometimes upsetting for tenants who do not like being labelled as homeless.

The large majority of allocations (excluding transfers) are to single people and small families with one or two children (Table 4, Annex 2).

The proportion allocated to households in stress varies somewhat between districts but is over two-thirds of allocations in every district, and in some districts constitutes 100 percent of allocations (Table 5, Annex 2). Overall, 89 percent of lettings are made to households in housing stress. This suggests that hard-to-let properties are not endemic on a large scale in any district within Northern Ireland, but exist in pockets within many districts. This supports the view often expressed by stakeholders that the small size of CLAs can create a difficulty in letting properties, even when there is demand for housing within the wider district.

Of all those on the waiting list (including transfers) more than half are waiting for one-bedroom accommodation. However, only just over a quarter of lettings are of one-bedroom homes (Table 6, Annex 2). In contrast, 27 percent of the waiting list require two bedrooms, but 43 percent of homes let have two bedrooms. There is a similar mismatch in relation to three-bedroom homes. This suggests that, unless more can be done to facilitate movement by overcrowded households in small units into larger ones, there may be a need to allocate some people to larger homes than are strictly required in order to meet their housing needs. No evidence is available on how widespread overcrowding in small properties is, so it is possible that even with greater movement of overcrowded households into larger units, there may still be a shortfall of smaller units.

The relative shortage of smaller homes is more marked within housing association stock. Only 14 percent of housing association lets were to one-bedroom properties in 2011-12 (Table 7, Annex 2). This may have a bearing on housing associations’ ability to cope with welfare reform (see below).
THE PROFILE OF THOSE ALLOCATED HOUSING ASSOCIATION HOMES

Further details on the profile of households allocated housing association properties are available from the Northern Ireland Continuous Recording dataset (NICORE). These data relate only to those allocated housing association homes.

As noted above, the stock profile of housing association stock differs from that of NIHE stock so the profile of households moving into housing association homes is likely also to differ from those moving into NIHE stock.

Over the year from 1 April 2011 to 31 March 2012, a total of 2,704 lettings (in both General Needs and sheltered accommodation) by housing associations in Northern Ireland were recorded in the NICORE.

Household incomes are recorded (Table 8, Annex 2) and these show that incomes of new housing association tenants are nearly all low. Only four percent of new households had incomes of over £25,000 and the large majority (78 percent) had incomes of under £15,000.

REASONS FOR HOUSING

The NIHE collect data on the reason for housing separately for FDAs (Table 9, Annex 2) and other applicants (Table 10, Annex 2). The data show that the most common reasons for housing for homeless applicants were “breakdown of sharing/family disputes”, “Accommodation not reasonable”, and loss of private rented accommodation. For non-homeless applicants, nearly half were recorded as “wants secure tenancy”.

Some stakeholders raised the suggestion that people sometimes claim intimidation in order to gain access to the most desirable social housing (such as new-build properties). In total four percent of allocations made in 2012 were to those suffering intimidation. Data for housing association applicants can be used to look at the main reason for housing (for both new applicants and transfers) by the type of letting (Table 11, Annex 2). This suggests that people rehoused because of intimidation were no more likely to move to new accommodation than any other group.

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4 In 2011-12, the NICORE recorded 255 lettings which involved support from a resident or visiting warden in the accommodation, and no lettings were recorded in part of a sheltered scheme for older people.

5 It should be noted that “intimidation” covers racial or sectarian attack, hostility because of an individual’s disability or sexual orientation, or attack by a person who falls within the scope of the NIHE’s powers to address anti-social behaviour.
The proportion of allocations to intimidation cases by community background is also in line with that for all allocations\(^6\) (Table 12, Annex 2). The proportion of intimidation cases that are let dwellings that have been empty for more than four weeks (and therefore possibly lower demand) is 25 percent, which is higher than the overall figure of housing association lets empty for more than four weeks of 17 percent (NICORE, 2011/12).

The data therefore does not support the view that intimidation is being used on a systematic basis to gain access to the most popular housing.

\(^6\) Overall, 1216 out of 1774 allocations to HA stock where the religious background of the household is known were made to Catholics (69 percent) and 451 to Protestants (25 percent). Of those rehoused because of intimidation, 107 out of the 155 where the religious background is known were to Catholics (69 percent) and 32 were to Protestants (21 percent).
WELFARE REFORM

WELFARE REFORMS AFFECTING SOCIAL TENANTS

THE WELFARE REFORM BILL

The Welfare Reform Bill has not yet completed its passage through the Northern Ireland Assembly as elements remain unresolved in relation to its final form. However, a number of concessions to the welfare system being introduced in the rest of the UK were announced by the Minister for Social Development in October 2012. The Minister advised that the Bill would be “customised to suit the special circumstances of people in Northern Ireland”. The main customisations include: the proposal to roll out Universal Credit from April 2014, six months after the rest of the UK (this timetable has slipped at UK level); direct payment of housing costs to landlords on an opt-out basis for those on full Housing Benefit; and the facility to make spilt payments between two parties in a household and fortnightly payments where necessary.\(^7\)

THE SIZE CRITERIA FOR SOCIAL TENANTS OF WORKING AGE

If the proposals within the Bill proceed in line with the rest of the UK, Social Sector Size Criteria would be introduced. These criteria will affect new and existing working-age Housing Benefit claimants living in the social rented sector. People living in homes larger than they need (under-occupiers) will have to move to somewhere smaller or make up the difference in rent caused by the reduction in their Housing Benefit.

The new size criteria allow one bedroom for each person or couple living as part of a household, with the following exceptions:

- A child aged under 16 would be expected to share with one other child of the same gender; and
- Children under 10 would be expected to share regardless of gender.

An extra bedroom is allowed where a carer provides regular overnight care for the claimant or their partner.

Housing Benefit will be cut by 14 percent for those of working age who under-occupy by one bedroom and 25 percent for under-occupation by two or more bedrooms. The government’s rationale for this policy is to contain Housing Benefit expenditure, encourage

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greater mobility and better use of stock within the social rented sector and improve work incentives for working-age claimants (DWP, 2012). Households faced with the implementation of the size criteria will ultimately face the choice of:

- Reducing the under-occupation by taking in lodgers or other family members
- Seeking to move to a smaller property, either social or private rented
- Paying the rent shortfall due to the reduction in Housing Benefit
- Increasing their income by finding work or working more hours so that they no longer require Housing Benefit to help pay their rent.

The implications of these new regulations throughout the UK are discussed in Report 2.

Extent of the problem in Northern Ireland

The latest available estimates are that around 34,100 households in social housing in Northern Ireland will be affected by the size criteria and the resultant shortfall in housing benefit payments. As can be seen from the table below, the majority of tenants affected by the size criteria are under-occupying by one bedroom.

<table>
<thead>
<tr>
<th>Category</th>
<th>NIHE</th>
<th>HA sector</th>
<th>Total Social Sector</th>
</tr>
</thead>
<tbody>
<tr>
<td>All tenants in receipt of housing benefit</td>
<td>68,259</td>
<td>24,725</td>
<td>92,984</td>
</tr>
<tr>
<td>Of which: of working age</td>
<td>43,400</td>
<td>15,000</td>
<td>58,400</td>
</tr>
<tr>
<td>Of which: Likely to be affected by size criteria</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Under occupied by 1 bedroom</td>
<td>17,900</td>
<td>5,400</td>
<td>23,300</td>
</tr>
<tr>
<td>Under occupied by 2 or more bedrooms</td>
<td>7,266</td>
<td>1,220</td>
<td>8,486</td>
</tr>
</tbody>
</table>

Source: NIHE, based on data from December 2012

The NIHE currently has 86,574 tenants, meaning that approximately 30 percent of its tenants will be affected by the size criteria. This is a very high figure in comparison to other parts of the UK (DWP, 2012). The figure for housing association tenants in Northern Ireland is somewhat lower, at around 20 percent, which is more in line with that seen elsewhere in the UK.
If one assumes an average NIHE rent of £58.76 per week (Leighton, 2012), the under occupancy deduction of 14 percent for one bedroom translates as a benefit reduction of £8.25 per week and £14.70 for those under-occupying by two or more bedrooms. These figures are higher when looking at the housing association sector: the average loss for Housing Association tenants would be £9.42 (one room spare) and £17.48 (two or more rooms spare).

Rents are, on average, lower in Northern Ireland than in the rest of the UK. This means that these shortfalls are smaller than those faced by individual tenants elsewhere. The sector overall, however, will be more strongly affected. Only 3,459 one bedroom homes were let in the last year (Tables 6 and 7, Annex 2), meaning that there will be a limited capacity for those seeking one bedroom homes to downsize within the social sector.

One cause of under-occupation is when children grow up and leave home, leaving their parent(s) behind to under-occupy the family home. However, another key cause is that social landlords commonly allocate homes somewhat more generously than the Social Sector Size Criteria allow, as discussed further below.

Data are available for lettings into housing association stock, which help to explore the extent of this practice in Northern Ireland.

Table 13, Annex 2 shows the extent of under-occupation of working-age new tenants in housing association lettings based on the bedroom standards that no one should share a bedroom unless they are a couple, children under 16 of the same gender, or children under ten of either gender. It shows that 41 percent of allocations to working-age tenants were to households who were under-occupying their new properties in 2011-12. Over half of working-age new tenants allocated to three-bedroom properties were under-occupying.

Table 14, Annex 2, gives the equivalent data separately for working age households in receipt of Housing Benefit and shows that 44 percent were under-occupying at the point of allocation. Over half of working-age new tenants who received Housing Benefit allocated to two-bedroom or three-bedroom properties were under-occupying.

The equivalent analysis cannot be carried out for NIHE stock because the household compositions are not recorded precisely enough to calculate the bedroom requirement, according to the Social Sector Size Criteria. Previous research in England (Clarke and Williams, 2011) has highlighted many reasons why housing may be under-occupied at the point of allocation. The research identified the following circumstances:
A mismatch between the size of the properties and the needs of the households in need of housing. For instance in some parts of the country (typically rural areas without many flats) there is a shortage of one-bedroom properties relative to the demand from single person households. In order to accommodate those in need, it may therefore be necessary to place some of them in two-bedroom homes. This is unlikely to be a problem from the household's point of view; most people enjoy having a spare bedroom, but it may mean that they are technically under-occupying.

Specialist stock, such as two-bedroom bungalows, is best suited to the needs of the elderly or those with mobility difficulties. Whilst these households often only require one bedroom on the basis of family composition there is frequently a need over time to have additional space within the home for use by carers or to enable the use of specialist medical/care equipment.

Homes with small bedrooms only suitable for one occupant each, but large numbers of families with young children to accommodate, meaning that a family with two young children is placed in a property with three small bedrooms.

Landlord support for a household wishing to accommodate part-time children (such as those who visit at weekends) or to foster children.

Properties are let in anticipation of an increase in family size or needs. For instance a two-bedroom property may be let to a woman expecting her first child, or a three-bedroom property to a family with a boy and a girl aged under ten.

Under-occupiers are offered a property that still allows them one spare bedroom as an incentive to downsize, for instance if an elderly couple gives up a four-bedroom house to move to a two-bedroom flat.

Households required to move for management reasons (such as in a regeneration scheme) may be offered a like for like swap for their current home even though they will still be under-occupying.

In the case of Northern Ireland, one reason identifiable from the HSS is that opposite-sex children above the age of seven are not expected to share a bedroom, whereas the Social Sector Size Criteria set the age limit for mixed-sex sharing at ten. This would explain some of the under-occupation (particularly of three-bedroom properties) according to the Social Sector Size Criteria, despite being allocated in line with HSS rules. However, this is likely to explain only a small proportion of the allocations to under-occupiers as it would only affect households with a boy and a girl both under ten, but where at least one of them is aged between seven and nine.
As discussed above, the rates of under-occupation for new NIHE tenants are not available. For housing association tenants, however, the proportion who are under-occupying at the start of their tenancy is substantially higher in Northern Ireland than it is in England (Table 15, Annex 2). These Housing Benefit claimants may have difficulties in affording their rents if/when the Housing Benefit reforms come into effect.

**THE HOUSEHOLD BENEFIT CAP**

The other element of welfare reform with direct implications for social tenants’ ability to pay their rent is the household benefit cap. This comes into effect from July 2013 in the rest of the UK, and is included in the Welfare Reform Bill not yet passed in Northern Ireland. It limits the amount of benefit that out-of-work working-age households can claim to £500 a week. Rent levels in the social sector in Northern Ireland are low by UK standards, so this measure is only likely to affect large households with more than four children. The numbers are likely to be very small (Ministerial Statement, 13 February 2013). Recent estimates are that 620 households in Northern Ireland will be affected by the benefit cap (Committee for Social Development, March 2013).

**WELFARE REFORM AND THE PRIVATE RENTED SECTOR**

There are a number of welfare reform measures already in place, or soon to come into effect, that will impact on the private rented sector, and are likely to increase demand for social housing:

**CHANGING LOCAL HOUSING ALLOWANCE RATES**

Local Housing Allowance (LHA) is the system for paying Housing Benefit to tenants in the private rented sector. The amount that tenants can claim is based on the size of home their household requires and local market rents. From April 2011, LHA has been calculated on the 30th percentile rather than the median rent, and therefore households now have to find accommodation in the cheapest 30 percent of the private rented sector in order to ensure that their full rental charges are met by LHA. Estimates have indicated that this may bring about an average benefit entitlement reduction of approximately £7.50 per week in Northern Ireland (Leighton et al, 2013).

**SHARED ACCOMMODATION RATE**

The Shared Accommodation Rate restricts Housing Benefit to the rate for a single room in a shared property. From January 2012, it was extended from claimants aged 24 and under to those aged 25-34. Over one-third (37 percent) of the people who are limited to the shared accommodation rate are working and on low pay (Leighton et al, 2013).
Identified concerns surrounding this change are:

✓ Reduction in benefit for those who wish to remain in self-contained accommodation;

✓ Limited availability of shared accommodation

✓ Increased pressure on the social housing waiting list.

UPRATING HOUSING BENEFIT RATES BY THE CONSUMER PRICE INDEX, APRIL 2013

The Welfare Reform Bill proposes to change the way in which LHA rates are up-rated by removing the link with changes in market rents and linking instead to inflation in line with the Consumer Price Index. This will mean an end to any relationship between LHA rates and actual cost of rents and could exacerbate shortfalls between benefit payments and the rents people have to pay (Lister et al 2011). The government has since announced that increases in LHA will be capped at one percent in 2014 and 2015, which may further increase the gap between LHA rates and market rents.

In England, Scotland and Wales, affordability issues are already emerging in the private rented sector, with more than two-fifths of LHA claimants finding it difficult to meet the cost of the rent charged for their current accommodation (Beatty et al, 2012).

Although there is not yet any robust evidence on the types of tenants who will seek social housing as a result of these changes, they are likely to lead to rising numbers of households struggling to afford accommodation in the private rented sector and therefore potentially looking for social housing. Single people aged 25-34 may be particularly likely to start to seek social housing if they do not want to live in shared housing. Welfare reform is also considered in the Housing Strategy (DSD 2012, p36), where a number of proposals were offered to meet its challenges including:

✓ Work with social housing landlords to support under-occupying tenants, who wish to do so, to move to smaller properties

✓ Explore the potential to support single people to share appropriate accommodation in the social housing sector

✓ Explore with social housing landlords whether there are opportunities to remodel some existing social properties in areas where there are particular shortages of smaller dwellings and build a different size mix of new accommodation within the Social Housing Development Programme. (p36).
This section provides a synthesis of the main issues that have emerged from a series of interviews and focus groups which were held with key stakeholders within the housing sector in Northern Ireland including representatives from the NIHE, housing associations, tenant representatives and advice and advocacy groups. Views from the five main political parties are also included and a full list of the stakeholders consulted is provided in Annex 1.

THE PURPOSE OF ALLOCATION SYSTEMS: HOUSING NEED AND WIDER POLICY OBJECTIVES

MEETING HOUSING NEED

All stakeholders consulted were of the view that any future allocation system in Northern Ireland should be primarily based on meeting individual housing need. The majority of stakeholders believed that this was a core role of social housing and that a system that differentiates housing need is required to ensure that those in the most severe need are housed quickly.

MEETING WIDER POLICY OBJECTIVES

At the same time many stakeholders expressed concern that a solely needs-based allocation system encourages the creation of a perverse “race to the bottom”. As one stakeholder argued that “the only currency they [applicants] have are their problems” so that the more problems an applicant has the better off they are in terms of being allocated social housing:

“It incentivises certain situations or behaviours. There is a culture change needed. We are squandering a scarce resource, for example, allowing people who abuse the system to jump to the top of the list”.

Many stakeholders highlighted that an unintended consequence of the current system has been the residualisation of social housing. A needs-based system cannot guarantee sustainable communities in terms of any measure of mix (religion, income, age, family type). Several respondents stated that the current system inhibits social mix and the development of sustainable communities. The result is a concentration of deprivation in specific areas which, in turn, affects public perceptions of social housing, creating a tendency to view social housing as a form of welfare for only the most vulnerable.

A common theme that emerged from discussions is that social housing, as well as meeting housing need, has a wider role to play in terms of broader social and economic goals such as
creating sustainable communities and assisting the economic renewal themes which underpin the current Programme for Government 2011-2015. Although allocation schemes can support these broader policy objectives, many stakeholders argued that the structure of the current allocations system in Northern Ireland is not only unable to support these broader goals, but acts as a barrier to them as it is based solely on housing those in the greatest housing need. It cannot therefore fully support the agenda of social and economic regeneration and building strong and shared communities and “a united and shared society” as referred to in the recent good relations strategy (OFMDFM, 2013, p1).

It should be noted here that, whilst there was overwhelming support for taking wider policy objectives into consideration in an allocations scheme, the idea did not receive 100 percent support. A small number of respondents felt that social housing should only be allocated to those in most demonstrable housing need. Not all were averse to incorporating wider policy objectives into an allocation scheme per se, but felt that this is not appropriate given the scale of housing need and severe mismatch in supply of and demand for social housing that Northern Ireland is currently experiencing. As one stakeholder argued: “If the state is talking about building sustainable communities, then we must meet housing need first”. Indeed, this discussion went further and suggested that it is only when we have substantially increased the supply of social housing that we can start discussing sustainable communities.

BALANCING THE AGENDAS

It was acknowledged that there was a conflict between these two agendas, and a need to find a balance. As one stakeholder summed up:

“An allocations policy for Northern Ireland should be about getting a strong balance between social housing being an option for a range of people and a valuable safety net for vulnerable groups. An allocation system needs to do both – currently it meets need but should also be achieving other goals, particularly economic renewal and social mix. These two goals are missing from the current allocations policy”.

The majority of stakeholders agreed that one way of achieving flexibility within the system whilst supporting wider objectives was the separation of those in need and other groups. For example it was suggested that 75-80 percent of allocations could be made on the basis of housing need, and the remaining 20-25 percent could be allocated in a different way, to meet wider policy objectives, such as achieving a manageable child density in a new housing development:
“When allocating, sometimes we know that there are going to be problems by looking at the number of children, if we had some discretion, say 20 percent of allocations not based strictly on need, then we could try and balance things out a bit”.

“Allocations are about much wider benefits. It’s about stimulating the local economy, creating jobs, about communities. So, we have to be able to take a flexible approach. Meeting housing need must always be the most important factor but it is not the only factor. We need a proportionate allocations policy”.

In effect, there could be different allocations operating in different areas depending on the circumstances in that area, thereby being locally responsive and employing sound housing management principles.

It was suggested that this would be especially appropriate in areas of new build to ensure a good housing mix and prevent clusters of low-income, highly vulnerable groups. Prioritising those on the transfer register could be used not only as a good housing management tool but also to reward those tenants who had been waiting for accommodation which was more appropriate to their needs. This could be particularly timely given the current welfare reforms that are imminent.

Several stakeholders acknowledged that these systems could introduce more subjectivity into the allocation scheme; however, it was agreed that the benefits of such a move could outweigh the potential risks by achieving wider government priorities. Conversely, tenant representatives drew attention to the benefits of the current system in that it was well respected and protected landlords or individual housing officers from having to make subjective decisions, due to the limited amount of freedom available to landlords under the scheme.

Stakeholders were asked to give their views on what types of applicants could be given additional priority in order to try and achieve these wider goals.
Those in employment

Most stakeholders stated that if one of the agreed aims of the allocations policy was to increase social mix then giving increased preference to those in employment is a good way of achieving this. Some stakeholders raised the issue of fairness given the severe shortage of social housing in some areas, and the potential of a negative reception of this policy by some in the wider community. However, most agreed that increased preference should be given to those in employment and were concerned that many people in employment are on the waiting list, due to the repercussions of the recent recession and the subsequent difficulties in accessing the owner-occupied sector.

Key workers

All stakeholders agreed that the issue of key workers was not as pressing as it is in other jurisdictions of the UK. Generally the underlying principle of giving key workers increased preference was not thought to be applicable in Northern Ireland as a number of stakeholders felt that Northern Ireland does not have the same commuting distance problems as other parts of the UK.

Those contributing to the community

Generally stakeholders were of the opinion that, in theory, there could be a reward for those that had contributed to their local community in some way, but in practice this would be unworkable. The argument presented was that this would involve too much subjectivity. What would be classed as contributing to the community? How would this be measured? Could this be applied universally? As one stakeholder commented, “it’s a nice idea, but it would be totally unworkable in practice, it would be impossible to measure community contribution”. However, most stakeholders saw merit in this in relation to enabling transfers for good tenants. Those who could be assessed as being good tenants on sound housing management grounds, for example, would have no rent arrears or record of anti-social behaviour. It was argued that these tenants should be rewarded and helped to transfer homes, especially to new developments as they could also act as a catalyst and assist in helping to establish good, sound foundations within new schemes.

Those committed to Shared Future

Separating and recording applicants that express an interest in Shared Future schemes was the most contentious issue of all. Some stakeholders felt that ideally you would identify people who want to live in a Shared Future Scheme and separate them out from the rest of the list, effectively creating a separate Shared Future waiting list. These applicants must commit to actively working towards a shared community ethos. It was suggested that this
could be run on a pilot CBL basis, so only those in a Shared Future band/list could “bid” for these properties.

However, many stakeholders were emphatically against having a separate list for Shared Future housing. The common view put forward was that if the aim is integration, then a separate list/band would not be appropriate. Some stakeholders felt that all new social housing should be Shared Future by default. Some felt that the Good Neighbour Charter should be mandatory for all allocations; however, others were of the opinion that applicants should be able to opt out of Shared Future if they wished. In effect, rather than opting into Shared Future, they suggested that applicants must opt out of it. It was also suggested that new-build development should be let on a Shared Future basis and only re-lets be offered to those that opt out of Shared Future.

The problem of achieving and maintaining Shared Future in terms of religious mix was identified by all as an issue, as under the provisions of section 75 of the Northern Ireland Act 1998, housing cannot be allocated on the grounds of religion. Therefore, even if there was a separate band/list for Shared Future, this would still fail to address the problem of how to ensure and maintain religious balance.

It was further suggested that we need to be taking a broader view of mix, not concentrating on identity but also including tenure and income. Indeed the Housing Strategy for Northern Ireland (DSD, 2012) now talks about shared communities. As one stakeholder said “communities are becoming more multi-ethnic, multi-cultural and this needs to be taken into consideration as well”.

Stakeholders also pointed out that increasing the flexibility in the current system would over time facilitate future changes in priority groups, to reflect differing policy priorities, or vary geographically to deal with localised issues, again building responsiveness and flexibility into the system.

**ELIGIBILITY AND ACCESS TO THE REGISTER FOR THOSE NOT IN NEED**

**RETEAINING THE PRINCIPLE OF UNIVERSAL ACCESS TO SOCIAL HOUSING**

Stakeholders, in general, supported the basic principle of universal access to social housing and the retention of this principle.

One stakeholder argued that those who were not in housing stress should be excluded from the register altogether.
However, the vast majority believed that everyone should have the right to apply for social housing, therefore retaining the principle of universal access. It was recognised that under the pre-set confines of the system, and where demand outstrips supply by some margin, not everyone will be found to be in housing need and therefore offered a social house. Put simply, the argument presented was that “Once you set the criteria for application you are immediately excluding people. There is no harm in applying but this does not mean you will get it [a house]”. A further argument presented in favour of universal access was in order to build more mixed communities by encouraging as wide a variety of individuals/households from the community to access the sector as possible.

There was no support expressed for the introduction of eligibility criteria such as income criteria (such as exists in the Republic of Ireland), age or, for example, the exclusion of owner occupiers.

Stakeholders did, however, highlight the need to ensure that when applicants were being assessed they were presented with a realistic assessment of their chances of gaining a social home and that they were made aware of their housing options in the wider housing system.

**ACCESS TO THE HOUSING REGISTER FOR THOSE WITH LITTLE OR NO DEMONSTRATED NEED**

A significant number of stakeholders agreed that those applicants on the waiting list for social housing with fewer than 30 points are not in housing need as currently defined in Northern Ireland. There is a concern that the waiting list is not an accurate reflection of housing need, and that the continued inclusion of those with low points distorts and skews the picture of those who are in genuine need of being housed. At present there are over 40,000 households on the housing waiting list and approximately 20,000 of these have fewer than 30 points and are therefore not considered to be in housing stress.

Some stakeholders suggested that these applicants could be listed on a separate register or grouped in a separate band (if a banding system is to be used) rather than barred from accessing the list. This approach would ensure that these applicants are not precluded from accessing social housing, as this list can be utilised for particular purposes such as allocating low-demand housing.

**EXCLUDING FROM THE LIST ON GROUNDS OF BEHAVIOUR**

There was strong support for allowing the NIHE and Housing Associations to have discretion to refuse to make an allocation (including transfers) on the grounds of anti-social behaviour. Stakeholders stated that there need to be clear sanctions for those that behave in an anti-social manner. This could include removing applicants from the waiting list or deleting their registration.
Several stakeholders suggested that some type of control measure is needed, with clear guidelines and policies on the interpretation and measurement of anti-social behaviour. Is it an Anti-Social Behaviour Order, an injunction, or based on information from the Police Service of Northern Ireland (PSNI)? Several stakeholders stated that utilising information from the PSNI would be sufficient, although some stated that verbal information would suffice, whilst others wanted more robust evidence than this. Several stakeholders felt that there needs to be better information sharing between landlords and in particular between the NIHE and housing associations. Several highlighted instances where a tenant has been transferred from one social housing provider to another and that only after allocation had the new housing provider received information from the previous landlord listing instances of anti-social behaviour. To resolve this issue one stakeholder suggested that, whilst some information relating to allocations is currently shared, more detail should be shared, and between a number of key organisations including social housing providers, the PSNI, social and health services and the Probation Board. The majority of stakeholders agreed that discretion should be the overarching principle for housing providers when dealing with the transfers of those committing anti-social behaviour. Flexibility within the transfer system was raised as an important issue, in that there may be circumstances (such as neighbour disputes) where the best option is to transfer tenants who are behaving in an anti-social manner.

A related, and more fundamental, concern is dealing with the anti-social behaviour itself. Whether a transfer is refused or if they are moved on, the underlying problem of anti-social behaviour is not being dealt with. Several stakeholders suggested the Scottish model of Demoted Tenancies as a potential option to deter and deal with anti-social behaviour. This approach tries to address the cause of the anti-social behaviour in the first place alongside the more punitive measures of the demoted tenancy. The support measures needed to deal with anti-social behaviour, particularly for those with mental health issues, were identified as a key issue.

**OPERATING THE HOUSING REGISTER**

There was widespread support for the need to consider the operation of the housing register within the wider context of access to housing of all tenures.

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8 The issue of transfers in relation to anti-social behaviour was raised in the NIHE (2011) Consultation on the Housing Selection Scheme. The Consultation sought opinions on amending the HSS to allow NIHE and registered social landlords discretion to refuse transfers to tenants who are involved in anti-social behaviour. Respondents supported this proposal overwhelmingly.
MANAGING EXPECTATIONS

At present in Northern Ireland very little information is available online, or provided to applicants routinely, to enable them to assess their likelihood of being offered social housing. Applicants are informed of their own number of points, but there is little information online about the average number of points required to obtain each type/size of housing. Such information would inform applicants with low levels of need that they are unlikely to be able to access most social housing and might be better considering other options, such as the PRS or moving to a less pressured area. Information online for potential applicants tells them how to apply for the waiting list, but does little to inform them that unless they have high levels of need, they may never be housed from it.

The term “waiting list” is commonly understood as a kind of queue, whereby applicants may expect to rise to the top with time. This could explain the significant numbers of applicants on the list despite having no points at present (Annex 2, Table 1). The HSS awards few points for ‘Time in Housing Need’ at two points per year (for a maximum of five years) after two years on the waiting list for applicants who already have points. This is explained in the HSS itself, but again, there is little information given to applicants to imply that those with low numbers of points are unlikely to receive offers in many areas.

Stakeholders reported a great deal of difficulties with applicants who were frustrated by not having been made an offer.

A HOUSING OPTIONS APPROACH

The vast majority of stakeholders raised the need for a Housing Options model to be introduced in Northern Ireland. Housing Options services have become commonplace across other parts of the UK (see Report 2 for examples) providing advice on housing and housing-related issues (such as dealing with debt or repossession) as well as helping applicants consider other housing options, including the private rented sector. It was felt that the introduction of this model would empower individuals to make positive choices about their future home whilst also helping to manage expectations of their likelihood of being housed within the social housing sector:

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9 See www.nihe.gov.uk/index/advice/apply_for_a_home/application_process.htm
“We intrinsically link housing need with social housing, but do we need to be looking at Housing Options? So, someone goes in to talk to an independent advisor. NIHE staff has a mind-set that if someone is in need of housing they are in need of social housing. There needs to be a better consideration of the situation someone is in and the options available... Options to potential applicants need to be made clear from the start”.

“We need to stop patronising people – present them with the reality of the situation – what their realistic prospects are for each type of housing and each type of area”.

A key message emerging was that social housing is a limited resource and as such there is a clear need for applicants to consider other housing options such as the private rented sector.

Housing Options approaches recognise that there is an insufficient supply of accommodation to enable everyone to live in their choice of area and tenure, but aim to provide applicants with the information needed to make informed decisions over their housing, from the options available to them. One element of this involves managing expectations of the likelihood of obtaining social housing in different areas.

One stakeholder suggested that a Housing Options service could be provided by the proposed new regional housing authority. The NIHE currently provides applicants with housing advice, and SmartMove helps provide access to the private rented sector, although it is not provided in the “One-Stop-Shopping” format that has become more common within other jurisdictions of the UK.

However, all those that suggested the private rented sector as a viable housing option stated that there needed to be more regulation of the sector, and more than what has already been proposed in the Housing Strategy (DSD, 2012), especially if it is to house growing numbers of vulnerable households. The provision of floating support was a key issue raised.

Affordability in the private rented sector was consistently mentioned, especially given the cuts to LHA discussed above. However, one stakeholder pointed out that private rented properties are available in many areas at a similar rental level to those found in the housing association sector.
Security of tenure within the private rented sector was highlighted as an area that government should be working towards. This included increased use of private sector leasing schemes. However, several stakeholders that work with private tenants stated that the tenants themselves were not particularly concerned with the security of tenure issue.

**WHO SHOULD ASSESS APPLICANTS?**

Under the current assessment system all applicants for social housing in Northern Ireland are assessed by NIHE officers. This is because the NIHE has a statutory duty (under the Housing (Northern Ireland) Order 1988) to assess whether an applicant is homeless. In order for any other organisation to carry out these assessments, a change in legislation would be required. Otherwise, if a housing association assessed applicants the NIHE would still be legally required to assess them, resulting in double assessments. The creation of new structures will facilitate a review of how and by whom assessments will be carried out. There was resounding support from the housing association sector to be involved in the assessment process and a number of arguments were presented to support this:

- All organisations are allocating under the same HSS and there is therefore no reason for housing associations not to complete assessments.

- Associations currently offer a wide range of schemes, many of which are specialised and have pre-set entry criteria. Association staff are highly trained in the entry protocols to these schemes and it is therefore efficient for them to assess applicants’ needs alongside the provision of the scheme.

- Associations are now managing higher financial risks and will increasingly do so as the funding and financial climate changes and this makes it more critically important that they are involved in all aspects of the scheme including assessment.

**APPLICANTS WITH DIVERSE NEEDS**

Stakeholders were clear that anyone undertaking assessments must have a comprehensive understanding of the diverse needs of applicants (such as those with mental health issues, dementia or ex-offenders), the diversity of the accommodation and the protocols for entry into specialist accommodation. There was a view that a robust training and knowledge base would bring with it many benefits including helping professionals within the sector to ensure a good “fit” between the allocated accommodation and the household’s needs. These arguments are particularly relevant when considering specialist schemes that cater for specific groups such as those with dementia.
One stakeholder noted the need for assessors to consider issues such as social support and poverty when carrying out the assessment to make sure that a full robust assessment of the needs of the household is completed. This form of assessment, where the needs of the individual are probed, should also ensure that, under the current system, the complex needs assessment is triggered where necessary and that those individuals who require more support receive the priority they require and also are housed within appropriate accommodation that meets their needs. Another stakeholder developed this argument further by saying that not only does the area of complex needs require attention, but also that this review should be completed in partnership with other statutory bodies in order to ensure the review is holistic. It should “take the opportunity to make other statutory bodies help … Why does everything have to be placed on the housing provider?”

Whilst there may be resource issues associated with a comprehensive assessment process in relation to staff time it was pointed out that within the current system there is evidence of duplication of work and the associated time resources that this entails, such as where housing association officers were carrying out additional assessments and in some cases home visits for new tenants before allocations were made to particular schemes. This was done to ensure that the applicant met the entry protocols for the scheme and to confirm that an appropriate support plan was put in place. Some key stakeholders indicated that currently complex needs assessments can take a number of weeks to complete, resulting in highly vulnerable applicants requiring immediate specialised accommodation being unable to receive an allocation until the assessment process has been completed. This not only has personal implications for the applicants, but also resource implications for the housing provider and other statutory bodies.

There is a question as to whether highly specialised schemes should continue to be dealt with and allocated through the main HSS. A number of stakeholders felt that they should not, and that this should also include sheltered housing schemes which are currently classified as general needs accommodation within the current system. Several stakeholders suggested that a reclassification is therefore required. Indeed, stakeholders working in this area of provision noted that not only should complex needs be dealt with on a separate waiting list but that this should incorporate accommodation, including for example: housing with care and residential care schemes; sheltered housing and dementia schemes. It was argued by one stakeholder that each of these types of scheme has its own selection criteria and needs assessments and protocols and therefore can and should operate outside the general waiting list in order to ensure that valuable bed spaces are filled quickly.
REASSESSMENT

Within the current system applicants are generally not reassessed unless they ask for a reassessment or, for example, when medical evidence is provided which could trigger the need for another assessment. One stakeholder in particular emphasised a need for reassessment, as housing need does not always remain static, particularly for the elderly where housing need in relation to the ability to live independently may change quickly.

TYPES OF ALLOCATION SCHEMES AND THE PROCESS OF MAKING OFFERS

The current HSS in Northern Ireland involves making direct offers to the highest ranked applicant in need of that size or type of property in that area.

CHOICE-BASED LETTINGS

Choice-Based Lettings (CBL), whilst common elsewhere in the UK and in the Republic of Ireland, were not always well understood in Northern Ireland. Stakeholders were, however, keen to explore CBL within the Northern Ireland context. Some were aware of its potential in addressing low-demand properties, and were aware of a scheme currently being piloted where dwellings that were particularly hard to let are allocated via CBL.

Overall, stakeholders were supportive in principle of the use of CBL schemes for low-demand housing. However, there were concerns as to how it would work in areas where demand outstrips supply, as it does in most areas. There was a lack of understanding around how CBL could work within the context of needs-based allocation and excess demand for housing. Indeed the spectrum of opinions offered by stakeholders in relation to CBL moved from seeing its use as being “confined to low-demand areas” to “choice-based lettings have played a good role elsewhere and the fact that NI hasn’t had one inhibits progress. CBL should be part of the options under consideration”. Several stated that they would welcome more information on CBL.

Low-demand housing is often associated with many problems, and therefore stakeholders believed that applicants should not be forced to live there, and as such the choice element is crucial. Stakeholders recognised that CBL for low-demand housing would deal with the issue of high refusal rates for these properties, which involves time and increased administration.

One of the benefits for tenants that stakeholders reported for a CBL scheme is that it can empower applicants. By providing them with information it ensures that they know the full range of options that are available to them. It was hoped that this would make applicants
more flexible once they know what is actually available, and it also helps to manage their expectations.

One area of clarification needed relates to who would be entitled to apply for these low-demand properties. Is it someone with low points, either on a separate register or on a separate band for CBL, or could it be simply anyone wishing to live there? One social housing provider interviewed stated that for low-demand housing they advertise the property publicly, then potential tenants have to go through the process of getting assessed, then wait to be given points, all before an offer can be made. In the meantime the dwelling is vacant, resulting in lost rental income, and the applicant may find alternative accommodation in the interim. It was felt that there could be a facility to by-pass the system so that the provider could simply advertise and allocate.

The NIHE has carried out small-scale pilots for CBL for low-demand housing where high numbers of refusals of properties were commonly seen for housing nearby of a similar type. The pilots are taking place in Banbridge, Ballycastle, East Belfast, Downpatrick and Limavady. There has been some success; however, these have not yet been rolled out more widely. Overall, stakeholders were in favour of a CBL system for low-demand properties, but less certain as to how it would work more widely.

**GEOGRAPHICAL AREAS OF CHOICE AVAILABLE TO APPLICANTS**

Under Rule 52 of the HSS applicants have the right to choose two Common Landlord Areas (CLAs) in which to live. These are pre-set areas which cover both NIHE and housing association stock (as relevant). These areas vary in terms of size and scale with some areas incorporating a village (e.g. the village of Portballintrae) and others a particular housing scheme. New build schemes can, in some circumstances, be classified as a new CLA. There are currently over 800 CLAs across the province with over 80 in Belfast alone. They are thus generally very small. CLAs are grouped together into larger General Housing Areas (GHAs) of which there are over 300 in Northern Ireland, and applicants can if they wish extend their choice of area to the GHA in which their CLAs of choice sit. FDA homeless applicants who have not been housed in their areas of choice after six months automatically have their areas of choice extended to the GHA area (Rule 55 of the HSS). This action is taken in order to increase the likelihood of them being allocated accommodation.

The majority of stakeholders thought that there were simply too many CLAs, with the current situation described as “ridiculous” and “a nonsense”. Whilst CLAs formed the focus of significant discussion, no clear direction was provided as to how areas of choice should be defined in terms of size and scale in the future. One suggestion made was that in Belfast there should simply be four CLAs: North, South, East and West Belfast; however, particularly
within areas such as North Belfast, it is difficult to ignore the highly fragmented nature of space along religious grounds. Segregation was noted as a “stumbling block” in relation to the future designation of areas of choice with the recognition that housing providers could not force applicants to live within areas and communities against their wishes.

**MICRO CLAS AND EXPECTATIONS**

Managing expectations was a common theme throughout interviews and focus groups, in particular, in relation to the size and scale of CLAs. There was general agreement that many applicants wish to live within the same street, or in some cases, next door to immediate family members. In effect, applicants create their own “micro” area of choice within the CLA which further compounds problems when attempting to accommodate households. With the significantly reduced social housing stock in Northern Ireland since the introduction of the right to buy (a loss of around 100,000 homes), applicants’ expectations must be managed throughout the application process and beyond as the consequences of not managing expectations are significant and include the refusal of reasonable offers and the associated resource implications this has. The current structure of small geographical CLAs (in some instances confined to a particular individual development) was argued by some stakeholders as working against efforts to encourage applicants to consider wider areas and simply encourages them to feel they will eventually be allocated a home in their micro area of choice:

> “[we need to ask] What can reasonably be meant to be ‘an area’? Why can North Belfast or East Belfast not be an area? It’s difficult because we have segregation, but it is still OK to ask people to live in the broad North Belfast area. We need to send a clear message. It is not OK to just want to live beside your mummy. We need to communicate this effectively with applicants – say ‘we will house you, but not next door to your family’.”

Some stakeholders therefore argued that CLAs should be widened in order to persuade applicants to be more flexible about where they would consider living and to help manage unrealistic expectations of being housed in a very small geographical area.

However, concern was expressed by other stakeholders and at the workshop that expanding CLAs could potentially increase the number of refusals of offers, if people were offered properties in areas in which they were not prepared to live, especially if the new widened CLA contained both communities.
There was a message from a number of housing associations seeking to develop new social homes that, if the assessment for new development was based on wider geographical areas, there could potentially be an increased development size - thus allowing larger schemes to be built. Some stakeholders argued that this would allow for better financial modelling with which to construct and rent these homes, as well as economies of scale. The impact that this would have on rural areas would require rural proofing to ensure that the government commitment to ensuring that all policies take into consideration rural needs and circumstances is met. However, one stakeholder did state that they did not want to see a return to large single-tenure estates and that a balance must be sought. Hence, clear and identified need is critical where future projects are being considered but it must be recognised that there is a changing and challenging financial climate for developing associations with less lending available and more stringent rules and repayment timescales on the finance that is available. A number of stakeholders expressed the view that areas of choice by applicants should not be used alone for determining future housing development.

One stakeholder argued that by basing future housing need assessments on, for example, GHAs rather than the smaller Local Housing Area\textsuperscript{10} planning tool, there would be a potential to identify larger areas of social housing need. It was argued that, in turn, this may facilitate the building of larger developments possibly on cheaper land whilst potentially having wider infrastructure benefits in relation to public services including schools. The stakeholder argued that public land could be used, which would facilitate more financially viable development options and, therefore, help to meet the demands of and encourage private sector financial investment. These arguments are particularly pertinent to urban areas.

Conversely, another stakeholder was of the opinion that we need to be careful when widening areas to assess housing need and that we should not move to the philosophy “we shall build and they will come”. Their concern was that sufficient demand might not materialise.

A further point raised by a number of stakeholders on this issue was that increasing the size of area used to identify future housing demand would enable wider policy goals to be achieved, such as Shared Future and mixed tenure.

\textsuperscript{10} The Local Housing Area (LHA) is a planning tool used by the NIHE to assess social housing need. There are 431 LHAs across Northern Ireland (in comparison with over 300 GHAs and over 800 CLAs) and their geographical boundaries are decided by an area planner and district manager from the NIHE on the grounds that they form a homogenous area which represents a clearly defined social housing market.
CITY CENTRE WAITING LIST

The need for a city centre waiting list for Belfast was raised by a number of stakeholders as an issue, although this is already proposed within the current Housing Strategy. The argument presented is that new city centre schemes currently have a tendency to become single identity once they are classified into a single CLA and then to a corresponding NIHE district office. Examples of schemes, particularly new apartment blocks, were given whereby once this classification for operational purposes has been made, the neighbouring community already living within the CLA has tended to move into the block, and as a result, the scheme has become occupied by households from the same religious community. There was a general view that welcomed the creation of a city centre list and it was strongly felt that administrative systems should not contribute to segregation. However, it should also be noted that applicants are free to choose the areas where they wish to live and therefore are not prevented by processes from living anywhere in Northern Ireland.

It should be noted that the NIHE consulted with the Minister for Social Development and following this the concept and physical area for a shared Belfast City Centre CLA has been agreed. The NIHE is currently working with housing association partners to support suitable proposed social housing developments within the city centre and once a scheme within the city centre boundary is identified as being deliverable, the CLA will be established.

NUMBER OF AREAS OF CHOICE

A closely related issue to CLAs is the number of areas of choice that applicants can select. This is currently limited to two areas under Rule 52 of the HSS, and applicants may usually choose whether or not they wish to be considered for properties in the wider GHA. Although this issue was not often raised explicitly by stakeholders, there were significant concerns about applicants selecting high-demand areas where there was often no realistic chance that they would be housed in the short and medium terms.

Suggestions made include:

- The number of areas of choice could be linked to and depend upon the agreed size of the CLA. If the CLA was large then in this instance selecting one area of choice could potentially be adequate; however, if there was limited accommodation available within the area then a facility could be built in whereby applicants would automatically be offered housing in adjoining CLAs using a cascading system.

- Applicants should be able to select more areas of choice, including more than one GHA, and these should be maximised as this approach may help to manage expectations.
It was felt that any definition of area of choice and the number of choices should be embedded within a system of advice whereby applicants are clearly informed not only of all their housing options both within and outside the social sector, but also of their chances of securing a home in their area of choice. This would be a means of managing expectations and reducing potential property refusal.

**DETERMINING THE SIZE OF HOME A HOUSEHOLD NEEDS**

Stakeholders stressed that the proposed occupancy rules for working age tenants on Housing Benefit must be at the forefront of housing managers’ minds when housing is being allocated, and that applicants should be made aware of welfare reform and the size criteria in the social rented sector\(^{11}\). While the changes only affect people of working age on Housing Benefit, a household’s circumstances can change and there was concern to avoid people being allocated properties where they may be considered by the Department for Work and Pensions to be under-occupying. This impacts on the discussion as to what constitutes a “reasonable” offer. Landlords are aware that they will need to assess whether applicants can afford accommodation before they make offers to households who will technically be under-occupying.

**THE APPROACH TO ALLOCATING LOW-DEMAND HOUSING**

There is no evidence of large-scale areas of low-demand housing in Northern Ireland. Overall, demand substantially outstrips supply. There are, however, low-demand properties and housing that is hard to let under the current allocations system.

There are several options that would potentially be useful in allocating low-demand housing, including CBL schemes, Shared Equity Schemes and offering property in these areas to those with low/no points (potentially those on a separate register), as discussed above. In addition, it was suggested that applicants could be incentivised to take low-demand properties, for example, with grants for redecoration or assistance with moving costs.

However, it is useful to mention here that a number of respondents thought that some properties may appear to be in low-demand only because of the small size of the current CLAs, as there can be high demand in the wider area but a low number of potential applicants for specific properties in small areas.

\(^{11}\) The NIHE report that since November 2012 they have been sending letters to applicants to advise them of the consequences of welfare reform.
As noted previously, the NIHE has carried out a number of small-scale CBL pilots for low-demand properties, with some success. Where there are difficulties in letting properties, they can be advertised more widely and people encouraged to express an interest in them. A formal offer can then be made only to someone who has expressed an interest. This speeds up the process of having to offer the property to each person from the list in succession, a process that can cause delays in letting times.

**DEALING WITH REFUSALS OF OFFERS**

Within the current selection scheme issues relating to offers of accommodation are dealt with under Rules 56-60 of the HSS. A number of issues were discussed:

- Defining a reasonable offer
- Number of reasonable offers
- Refusal of offers, sanctions and enforcement of rules
- Effective communication
- Multiple offers.

**DEFINING A REASONABLE OFFER**

Currently, under Rule 57 of the HSS, when making a reasonable offer the officer should consider the following factors in relation to the household:

- Size of accommodation
- Suitability of accommodation – area of choice
- Suitability of features
- Condition of accommodation – be fit for human habitation and be in reasonable state of repair.

There was widespread agreement among key stakeholders for retaining the following factors in determining whether an offer is reasonable:

- Meets the assessed needs of the applicant/household
- Meets the size needs of the applicant/household
Lie within the area of choice.

In addition, there was concern that a reasonable offer is also one for a property that is affordable, given the welfare reform measures affecting Housing Benefit payments to working age tenants proposed in the Welfare Reform Bill.

**NUMBER OF REASONABLE OFFERS**

Under Rule 56 of the current allocation scheme all applicants are entitled to receive a maximum of three reasonable offers. A majority of key stakeholders were of the opinion that the number of reasonable offers made should be reduced to two. Stakeholders felt that whilst two offers would indeed be reasonable, this decision was prefaced with a number of conditions which include:

- The need for a clear definition of what constitutes a reasonable offer including area of choice and tenure issues.
- The need for a robust assessment system which would assess the circumstances of the individual/household so that a decision about the type of accommodation the household required could be made.
- Robust training so that those making offers have a clear understanding of what is meant by “a reasonable offer” and how it should be applied.
- The critical importance of advising applicants of the consequences of refusing offers. They must be advised that, once the first offer had been refused, any second offer would be their final offer. This would empower the applicant to make more positive and realistic decisions about where they wish to be housed.
- Clear written communications to the applicant to ensure that the applicant is informed of the process and the implications of refusals.
- Adequate time given to allow the tenant to decide whether to accept an offer, as it is important to ensure that the tenancy is the right choice which in turn would help to sustain the tenancy in longer term.

Stakeholders felt that some of the difficulties with high rates of refusals of offers arose from these processes not always being in place, and that by ensuring this practice was followed it would be possible not only to reduce the high levels of refusals of reasonable offers, but also to help manage applicants’ expectations.
Furthermore, a number of stakeholders suggested that should a CBL system be introduced, for example, for low-demand properties, then applicants should be afforded a further offer which would increase the maximum number of offers to three, but only in these circumstances (i.e. two standard offers and one offer through a CBL scheme). Other stakeholders felt that CBL should operate outside the standard offer rules. These comments suggest that stakeholders do not fully understand how a well-devised CBL scheme would work, as in practice no “offers” are made; people bid for properties which then go to the person with the highest priority under the scheme.

**REFUSAL OF OFFERS, SANCTIONS AND ENFORCEMENT OF RULES**

Under the current system, Rule 59 states that in circumstances where the maximum three offers have been refused no further offers shall be made to the applicant for a period of one year commencing from the date of refusal of the third offer. The system therefore allows the applicant to remain on the list but their application is deferred for a year.

A number of stakeholders felt that the penalty is not always applied. This point can be quantified using data from the NIHE Discussion Paper (2012b) which draws upon an analysis carried out by their Research Unit in 2006-07. This analysis found that 34 percent of offers were refused (with a reason for refusal supplied), a further 33 percent of applicants did not reply or give a reason for refusal and 29 percent of offers were accepted. It was further noted that:

> “Of the applicants (34 percent) who refused an offer of accommodation, 49 percent had refused the first offer, 24 percent the second, 13 percent the third, 12 percent between four and six offers and the remaining three percent of applicants seven or more offers”.

Over a one-year period, from March 2010 to March 2011, a total of 738 applicants were deferred as a result of refusing three reasonable offers (NIHE, 2012b). NIHE (2012b) noted that whilst the refusals rate reflected a mismatch between applicants’ needs and stock profile to a certain extent, the aspirations of many applicants appeared to be of more importance.

One issue highlighted by a number of stakeholders was in relation to the management of expectations of applicants. There was a perception that properties were being refused for reasons such as the lack of an ensuite bathroom, or not being a new-build home. Stakeholders were concerned about refusals of reasonable offers on a repeated basis.
There is a clear recognition of the high levels of refusals of offers and considerable agreement across the sector, including tenant representatives and representatives of rights based organisations, that this is an issue which needs to be addressed. The issue of refusal generated much discussion but in general stakeholders felt that clear, transparent and “stringent” penalties should be imposed to ensure equity within the system. The majority view was that within the operation of the current system sanctions were not being imposed consistently. Stakeholders believed that the current rules of removing applicants from the waiting list for a period of a year if they refuse more than the permitted number of offers should be enforced, and some stakeholders felt that this period should be two years. Furthermore, at the point where the applicant would become eligible to reapply it was argued they should be required to make a new application and go through the assessment process once again, so that they would not retain their original standing on the list.

Other suggestions made included:

- The number of reasonable offers could vary between areas of high and lower demand. For example, in an area of high demand housing bodies could have discretion to give fewer offers; however, concerns were expressed that this could impact on one community more than another in some areas.

- Once the maximum number of reasonable offers has been refused the housing provider should, as a matter of course, direct the applicant to the private rented sector.

**“MULTIPLE OFFERS”**

“Multiple offers” are made where a housing provider issues a communication to a number of applicants simultaneously who are eligible for the accommodation in question. These letters are only seeking expressions of interest in a specific unit of accommodation and are not legally deemed to be a reasonable offer under the terms of the scheme. It appears that the use of multiple offers by both the NIHE and housing associations is now commonplace for difficult to let accommodation and increasingly for sheltered schemes and apartment blocks. Multiple offers help to increase the speed of lettings and reduce void times in comparison to the more traditional single offer to a single applicant process which can be resource hungry in terms of time and void loss (see Rule 69 of the HSS which relates to multiple offers and difficult to let properties).

Whilst this is an accepted method of allocation, stakeholders raised some issues relating to its use. One was that applicants did not understand the process. A number of stakeholders highlighted confusion amongst some applicants who thought that they were being made an
exclusive offer and were not aware that others had also been offered the property. When this type of offer is used it is imperative that all communications to applicants are clear in pointing out that it is simply seeking an expression of interest rather than making a formal offer of accommodation.

THE APPROACH TO PRIORITISING APPLICANTS ON THE WAITING LIST USING A POINTS-BASED SYSTEM FOR ASSESSING HOUSING NEED

The majority of stakeholders saw merits in a points-based system for assessing housing need which can be broadly summarised as being seen by stakeholders to have “depoliticised a very political issue” and as having:

“... the advantage that it is relatively easy to explain so to members of the public there is a tangibility to it. This means that there is a level of public trust in the system which is a good thing. In Northern Ireland if you ask how it works people seem to get it. They might say they have been on the waiting list too long, or that their neighbour is on the list and should not be, but they understand the way it works”.

However, stakeholders also raised significant concerns about the current points system. There was a view that the current scheme was overly complex, lacks flexibility and it can be hard to follow for some. Several respondents highlighted the fact that the number of criteria for points has been added to over the years, resulting in an unwieldy system to operate:

“It has not kept up with changes or adapted. It incentivises certain situations or behaviours. There is a culture change needed. We are squandering a scarce resource, for example, allowing people who abuse the system to jump to the top of the list”.

In addition, respondents highlighted several specific issues within the points-based weighting system, such as intimidation points, under-occupancy points, unsuitable accommodation points and complex needs that need to be reviewed – some of which are already in the process of review by NIHE. These are discussed further below.
Advantages

Notwithstanding the recognised disadvantages of the HSS it continues to have broad support from stakeholders, tenant representatives and advice and advocacy groups. Whilst all respondents agreed that there are problems with the HSS, several advantages of the current system were highlighted:

✓ **Defensible**: The main reported advantage of the points-based scheme is that it is defensible in terms of how allocations are made. Some felt that there is less scope for discretion than may be available within alternative allocation systems and, therefore, the scheme is less open to misinterpretation or accusations of unfairness. This issue was raised by both housing professionals and tenants’ representatives as being of real importance.

✓ **Ease of understanding**: A points-based system is relatively easy to explain to applicants, which adds to public trust in the scheme. Applicants understand that a given number of points will place them above or below those with fewer or greater points. It can also provide an indication of how many points are needed to be housed in a given area.

✓ **Trust**: Although there are difficulties within the current system, stakeholders noted the high regard and trust that the housing sector and the wider public hold for the scheme. The fact that it has not been successfully legally challenged on religious grounds is considered a mark of how it has operated effectively within the particular context of Northern Ireland.

Disadvantages

The majority of stakeholders stated that the current scheme has become overly complicated, with various additions made since its introduction. In terms of specific disadvantages respondents raised the following issues:

✓ **Fabrication of need, points-chasing and fraud**: There was a general view that there are cases in which need is fabricated, exaggerated or applicants deliberately worsen their own housing situation in order to receive points. This was raised particularly in relation to intimidation points.

✓ **Complexity**: Whilst points-based systems generally are relatively easily understood, many respondents stated that the HSS has become overly complicated over time and that the detail of the current system is not easily understood by applicants.
The use of banded systems was discussed during interviews with stakeholders where some recalled the system that operated in Northern Ireland before the HSS. A number of stakeholders were in favour of the use of bands. One argued, for example, that bands had a clear structure, unlike the points system which, it was argued, has led to points-chasing. Another stakeholder argued that “Banding schemes work well, they provide transparency. We should move away from a points-based system to having bands of people”.

However, others were unclear as to how banded systems operate and how they could therefore be operationalised in Northern Ireland. There was also an element of confusion among some who were aware of bands in relation to how they worked. Stakeholders were receptive to considering new systems of allocations and would, as such, welcome more information on this approach.

In addition, the focus groups discussed the banded approaches used elsewhere although there was concern that such approaches may struggle to reflect the different elements of housing need captured under the current scheme. There was no support for the system under consideration in the Republic of Ireland (and in use in some areas in Britain) whereby quotas for each band were used to ensure all could get housed eventually, as this would mean that some allocations were made to people who were not in the most need.

THE NATURE AND WEIGHTING OF HOUSING NEED CRITERIA

Stakeholders raised a number of areas of concern in relation to the nature and weighting of some of the elements of the housing need criteria. These relate to intimidation points, interim accommodation points, single applicants and sharing points and how ex-service personnel should be treated.

INTIMIDATION

Rules 23 and 23a of the current points-based system award 200 intimidation points to applicants in certain circumstances. These include those who find themselves in a situation where their home has been seriously damaged or destroyed or where they cannot be expected to live or return to their home as doing so would place them or their household at serious risk. Examples of where these rules can be applied include intimidation on the grounds of: racial and sectarian attack; terrorism; an individual’s sexual orientation; or disability\(^\text{12}\). To contextualise the significance of the award of 200 points, under the current

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\(^{12}\) The current definition of intimidation reflects legislative change including the Race Relations Order (NI) 1997 and the Northern Ireland Act 1998.
system those found to be Full Duty Applicants in relation to being homeless receive 70 points. The award of 200 points was described during this research as “bonanza points”.

In 2011, the NIHE carried out a consultation on a number of key issues, one of which included the scope and role of Rule 23. The result of this consultation was that most of the respondents favoured the removal of “the absolute priority given to those experiencing intimidation through the current award of 200 points”.

When discussing the issue of intimidation points with key stakeholders there was some variation in opinion, particularly between tenant representatives. The overall view, however, in line with the NIHE (2012b) consultation responses, was that intimidation does not need to be a separate category of housing need in any new system of social housing allocation in Northern Ireland. In 2012, a total 189 lettings into NIHE stock and 195 into HA stock were to applicants rehoused as a result of intimidation, representing 4.3 percent of the total 8,994 lettings into social sector stock (Tables 9 and 11, Annex 2). It was widely felt that the 200 points associated with intimidation are being used unproductively in a number of ways. For example, there was a perception that they are being used by the perpetrators of anti-social behaviour to move when they find themselves having to leave an area as a direct result of their behaviour. Concerns were also expressed that these points encourage applicants to deliberately worsen their situation in order to receive them, especially at times when they think they may be able to access newer, more desirable housing as a result. However, data on allocations to housing association properties (Table 11, Annex 2) shows that people rehoused following intimidation are not any more likely than other applicants to be housed in new accommodation, which suggests that this is not happening on a systematic basis.

Some expressed the view that paramilitaries have been paid to intimidate people so that they qualify for these points. Whilst there is no evidence to support this, it does bring into question the significance of intimidation points. It was felt that today these rules are resorted to increasingly for issues such as anti-social behaviour including drugs-related activity.

The majority of stakeholders thought that priority should be given to those who had experienced a sudden or serious act which could cause threat to life or loss of home. These included fire and flood or those forced from their homes as a result, for example, of racial harassment, domestic violence or another threat to the person. Intimidation points in their current form should be removed and serious situations should be dealt with in a consistent manner. As one stakeholder argued “homelessness is homelessness whatever the cause”.
UNSUITABLE ACCOMMODATION

Stakeholders were asked for their views on the ten points awarded to those assessed as living in unsuitable accommodation. Unsuitable accommodation is outlined under Rule 38 of the HSS and awards points to:

- A second person in the Applicant’s household who scores above a threshold of points in the functional matrix \(^{13}\) or
- The Applicant or a member of his/her household who has difficulty in gaining access to his/her accommodation which is above ground floor level and is not served by a lift (NIHE, 2009 pp17-18).

Points for unsuitable accommodation are made in addition to functionality points \(^{14}\) which are dealt with under Rule 37 of the HSS. There was general agreement by stakeholders that the current weighting for unsuitable accommodation is too low, and that, relative to other issues in the points system, it fails to recognise the severity and range of difficulties experienced by some applicants. It was felt by many stakeholders that the only way currently to ensure that applicants with severe mobility problems are allocated accommodation that meets their needs was to process them through the homeless legislation. Because housing and homelessness assessment and services are closely integrated through the Housing Selection Scheme, it has been recognised that there is a tendency for recourse to homelessness legislation in a range of circumstances that could be adequately and more appropriately recognised with sufficient points awarded through the Housing Selection Scheme itself (NIHE, 2011). Due to the individuality of the needs of applicants in this category, some stakeholders expressed the need for the “unsuitable accommodation” category to encompass a wide variety of circumstances, and also that some differentiation of the level of need and difficulties experienced in the current accommodation was required.

The issue of the low level of points awarded for unsuitable accommodation was also discussed in the NIHE (2011) Housing Selection Scheme Preliminary Consultation Paper which asked for views on the option to “enhance the Housing Selection Scheme criteria for

\(^{13}\) The functionality matrix is used by the NIHE to award up to award points to those applicants who have health and social well-being needs, for example, those with mobility difficulties within their existing accommodation.

\(^{14}\) Rule 37 of the HSS defines functionality as “the ability of an Applicant or a member of the Applicant’s household to function within his/her current accommodation will be assessed using a functionality matrix. The scoring from this matrix will be added to the total points awarded to the applicant.
the award of unsuitable accommodation points to a more sensitive degree by recognising additional “trigger” circumstances and by attaching greater weight through the award of additional points …” (p16). Respondents to the consultation exercise overwhelmingly supported the proposal to revise the current criteria and the level of points attached (NIHE, 2012b).

INTERIM ACCOMMODATION POINTS

Stakeholders were asked whether additional Interim Accommodation points should be awarded to statutory homeless applicants after further periods spent in temporary accommodation.

This issue was included in the NIHE (2011) consultation where it was proposed that “… additional Interim Accommodation Points should be awarded incrementally to recognise time spent in temporary accommodation by those applicants who were owed the full statutory housing duty under the homelessness legislation” (p17). The responses to the consultation confirmed overwhelming support for this proposal with the majority of respondents expressing the opinion that these points should be awarded to all statutory homeless applicants (NIHE, 2012b). Many respondents also felt that this award should be made on an incremental basis.

Almost all stakeholders interviewed for this review agreed that additional Interim Accommodation points should be awarded to statutory homeless applicants to reflect time spent in temporary accommodation (such as hostels), as the current number of points awarded makes little or no difference to their chances of being re-housed. Respondents agreed that these should be awarded incrementally, most suggesting adjustment every six months, whilst another suggested initial points awarded at six months, then subsequently, every three months, to reduce any incentive for people to move to hostels in order to increase their priority for housing. Some suggested that points should be awarded after only one month, particularly for families/single parents. It was evident that the particular concern of stakeholders was in relation to the use and extended use of all forms of temporary housing where children are involved. The impacts of displacement on the health, well-being and education of children are felt to be of the utmost importance. Many respondents felt that additional priority should be given to those in all types of temporary accommodation, including those staying with family members, not just to those in accommodation provided by NIHE. This would reduce any perverse incentive for homeless applicants to be accommodated by the NIHE.
Several stakeholders offered further suggestions on interim accommodation points:

✓ The number of moves should be taken into account.

✓ Differential levels of points should be used (whereby families with children obtain more points than single people).

Many stakeholders highlighted the particular difficulties in getting those in hostels rehoused, and that this has resulted in a bottleneck or “silting up” of some hostels. Even if hostel residents are awarded additional Interim Accommodation points, this will only move them up the list and not necessarily get them rehoused. In addition, it was felt that the current points system does not award an appropriate number of points to hostel residents. They have their own room in a hostel, which is usually in good condition and they are not sharing. As a result they are not deemed to be in substantial housing need and unless they are in move-on hostel accommodation, which confers an extra 70 FDA points, the 20 points attached to living in a hostel is too small to be meaningful.

A related concern was the lack of suitable move-on accommodation for hostel residents with complex needs, or Housing First options to enable them to bypass hostels altogether. One option is the private rented sector, but for this to be a viable housing option for the most vulnerable, there needs to be more floating support to help them to sustain their tenancy and prevent repeat homelessness.

SINGLE APPLICANTS AND SHARING POINTS

Under Rules 25-27 single applicants who share with their immediate family and wish to be re-housed as a separate household are awarded up to 20 sharing points. The points are cumulative and relate to sharing facilities (kitchen, toilet, bath/shower, living room). Sharing points are awarded to applicants with dependent children and applicants aged 18 and over without dependent children. Applicants aged 16-18 are only awarded sharing points if they are sharing with someone outside their immediate family.

The vast majority of stakeholders were of the opinion that these sharing points should be removed for those singles sharing with their immediate family. This is in agreement with the proposal made by NIHE (2012b p31) “…that single applicants currently sharing with family members should no longer be entitled to sharing points”. If we are dealing purely with housing need, stakeholders felt that a single person living with their immediate family should not be classed as being in housing need. However, one stakeho

2lder argued that this issue should be examined in overcrowding terms.
The impact of removing 20 points for singles sharing with their immediate family was raised as this would have a significant effect on the waiting list for social housing, since just over half of those on the waiting list for social housing in Northern Ireland are single people and around 21 percent of these have 20-29 points, and a further 20 percent between 30 and 49 points (Table 1, Annex 2). If these applicants are currently receiving sharing points, many would no longer have any points, and up to 20 percent of all single applicants would fall below the “housing stress” threshold of 30 points.

**EX-SERVICE PERSONNEL**

In Britain, some allocation schemes give specific priority to ex-service personnel (although this ranges from very high to quite low) and the UK government has recently specified that they should consider doing so. However, the vast majority of stakeholders interviewed believed that ex-service personnel should not receive any additional preference in terms of additional points. It was felt that the allocation system in Northern Ireland would adequately reflect their housing needs, and the preferred option was to treat them the same as any homeless applicant. Some stakeholders felt that giving increased priority to this group would lead to questions being asked as to why other groups, such as ex-PSNI officers, are not getting increased preference.

The general view was that ex-service personnel should be given the same level of priority as someone else with the same needs, although this could include treating them similarly to other applicants who are losing tied accommodation, or leaving institutions. One stakeholder also suggested that ex-service personnel should be given more areas of choice in recognition to difficulties they may have in finding a suitable area, as they are limited in the areas in which they can live.

There was, however, agreement that ex-service personnel should not be disadvantaged because of residency issues and a lack of local connection.

**APPLICANTS WITH A LOCAL CONNECTION**

There is currently no requirement within the HSS to prioritise those with local connections (beyond the connection with Northern Ireland as a whole) which would help to retain family networks, and keep local communities together. A minority of stakeholders felt that if the objective is to sustain rural/urban communities, this issue should be reviewed.
TIME ON THE LIST

Stakeholders in Northern Ireland recognised the value of some priority being awarded for the length of time applicants had waited for housing, but were concerned that this should not become an overriding factor that would prevent those in the most need from being housed.

ADDITIONAL TYPES OF HOUSING NEED

Some stakeholders felt that the current scheme does not reflect all aspects of housing need. Increasing priority for those with mental health problems, personality disorders and very young applicants was suggested.
TRANSFERS AND DOWNSIZING

TRANSFERS

Stakeholders were keen to highlight the importance of the transfer system in allowing mobility within the sector, with the majority in agreement that increased use should be made of the transfer list. Currently, when making allocations to transfer applicants a ratio of one transfer allocation for every two waiting list allocations is used. It was suggested that the current system can inhibit mobility as people may refuse an offer because they believe that once they are housed, they are likely to be there for some time. But if more use was made of transfers, there would be more movement and therefore people would be more likely to accept an offer because they would be able to transfer later if they so wish. One key concern was the length of time tenants must wait before becoming eligible for a transfer (normally two years). Consideration is currently being given to increasing the flexibility within the transfer system, effectively giving landlords the opportunity to afford greater recognition/weighting to certain circumstances in order to promote mobility (NIHE, 2012b).

Transfer to new build

There is currently no separate policy on allocation to new-build developments. However the potential benefits of prioritising transfer applicants for a greater proportion of new-build developments was highlighted by most stakeholders on the grounds that it would reward good tenants and help build sustainable communities. This highlights the rights and responsibilities agenda; to be eligible for a transfer tenants must show that they have been a responsible tenant by having a clear tenancy and not breaching any terms of their tenancy agreement. It was argued that this would also help avoid concentrations of very vulnerable tenants in one place.

The majority of housing association stakeholders would prefer an increase in the proportion of transfer allocations to new build. One stakeholder stated it would be preferable if 100 percent came from transfers, as the previous history of the potential occupant is known, thereby promoting stability in the development. The dwellings they vacated can then be allocated to applicants on the waiting list. However, others stated that it would be difficult to justify allocating to someone already housed over someone from the waiting list who is in priority need.

Separate transfer list

There was no consensus on whether there should be a separate transfer list. Many stakeholders felt that this would be useful, but a number argued that the system works well as it stands, and a separate list is unnecessary.
DOWNSIZING

A major issue is the need to ensure that under-occupiers who lose Housing Benefit as a result of the welfare reforms\textsuperscript{15} are able to move to somewhere smaller if they want.

Tenants are currently awarded ten points for every bedroom in excess of the standard up to a maximum of 30 points. The vast majority of stakeholders were of the view that greater priority should be given to households who are under-occupying and wish to downsize. There was no support for limiting this priority to those affected by welfare reform, as all downsizers would release a larger home for letting to another applicant.

Many stakeholders suggested that increased use of management transfers should be considered in dealing with this issue within the current scheme. The Management Transfer Policy gives district office managers the discretion to transfer tenants, under certain circumstances, without reference to their points status, principally to facilitate the best use of stock, i.e. good housing management. Currently managers have discretion to make allocations to management transfers without exclusive reference to points levels (NIHE, 2012a).

It was suggested by most stakeholders that much greater priority should be given to under-occupiers moving within the social sector, either by awarding additional points or, if a banding scheme is used, by placing under-occupiers in the top band. The NIHE has conducted an analysis of these issues in 2012 and subsequently proposes to introduce a Management Transfer category for downsizing tenants.

Tenant-led home swapping was highlighted as an area which warrants further investigation, with the possibility of improved information being made available to help tenants find others to swap with. The main advantages of this are better utilisation of housing stock and potentially helping tenants affected by the size criteria to downsize.

Recently (December 2012) the NIHE procured access to the HomeSwapper UK-wide internet-based exchange scheme for all social tenants in NI to increase mobility options.

Transferring with arrears

Under current rules a tenant should not be in arrears in order to be eligible for a transfer. The changing under-occupancy rules for Housing Benefit may push some tenants (previously with clear rent accounts) into rent arrears solely because they are under-occupying their

\textsuperscript{15} Subject to the Welfare Reform Bill being passed in the Northern Ireland Assembly
current dwelling. In these instances a transfer would be appropriate, resulting in a more affordable home and therefore more potential to clear the arrears. It should be noted that the NIHE are proposing to amend the current policy of refusing access to the transfer list to tenants who are in arrears\textsuperscript{16} of four or more weeks.

\textit{Increased use of the private rented sector to deal with under-occupancy}

Increased use of the private rented sector was suggested as a possible option for some affected by the under-occupancy rules, principally because this tenure has a relatively high proportion of one-bedroom accommodation. A Housing Options approach, as described above, could help some tenants to move to the private rented sector, subject to the availability of accommodation within LHA limits.

\textsuperscript{16} Only for tenants who have incurred arrears as a direct result of the shortfall in housing benefit due to the size restriction.
CONCLUSIONS

The allocation system in its current form creates a number of barriers to achieving the objectives set out in government strategic priorities including the Programme for Government 2011-15 (NIE, 2012), the Housing Strategy (DSD, 2012) and Together: Building a United Community (OFMDFM, 2013). The current system is based purely on housing need with little flexibility to create mixed, vibrant, safe and sustainable communities. In effect, social housing providers are compelled to house solely on the basis of housing need and, therefore, to those at the top of the waiting list, without regard to wider social, economic and demographic considerations.

There was a strong consensus that any review of social housing allocation policy needs to be wide-ranging and indeed fundamental, asking challenging questions such as what is the purpose of social housing in Northern Ireland? Stakeholders were in agreement that the founding principles on which the current allocation system was based (i.e. meeting housing need by awarding priority to applicants according to agreed criteria) were sound. However, the unintended consequence has been an allocation system which may have contributed to concentrating the most vulnerable within specific areas, although socio-economic factors may also play a part. A balance between the desire both to meet housing need and to address wider agendas was broadly supported. Stakeholders wanted allocations to be based primarily on need, but also to include an element of flexibility to ensure that the scheme is responsive to changing policy priorities and the local housing market context and thus make it fit for purpose into the longer term.

Stakeholders agreed on many of the issues dealing with the operational side of the HSS, advocating a less complex, more flexible approach to the allocation of social housing in Northern Ireland. It was argued that the scheme itself cannot be looked at in isolation, but account should be taken of the effects (intended or unintended) that a new or modified scheme could have on other parts of the housing system. Indeed, any changes whether minor or major have the potential to impact both within and beyond the scheme itself, creating a ripple effect. There was an overarching concern throughout the sector about the extent of the review and how any changes may impact on other parts of the housing system. This message was particularly relevant to the private rented sector as it increasingly becomes an option for low-income households who might also look to social housing. If there was increased emphasis on the private rented sector as a viable housing option though a model such as a Housing Options model, then the impact this would have on the private rented sector for both tenants and landlords should be investigated. Stakeholders were aware of the need for social housing to address wider policy objectives; however, there was debate about the methods of achieving this, and indeed whether it was
achievable in areas with high pressure on the housing stock. There was general agreement that housing need should remain central to housing allocations, along with a desire to simplify the existing scheme.

Stakeholders have said that they are willing to consider alternative allocation models. For example, stakeholders were keen to explore CBL within the Northern Ireland context. However, this was for low-demand housing as stakeholders were unsure how CBL would work in high-demand areas. Stakeholders were keen to stress that regardless of the model, it is imperative that housing professionals are embedded within the fundamental review, the decision-making process and its implementation.

Stakeholders also appeared reluctant to abandon the use of points to determine housing need and in some cases they seem to believe that a points system is the only way of doing this. However, this apparent reluctance by some stakeholders to move away from a points-based system must be viewed in terms of an overall lack of knowledge of alternative methods of prioritising applicants. Utilising a points-based system of prioritising need is one method of prioritising applicants; an alternative method is placing people in bands reflecting different levels of priority. However, as some stakeholders themselves stated, despite some experience of using bands in the past, there is today a lack of depth of understanding of banded systems amongst housing professionals in Northern Ireland. Although a banded system had previously been used within social housing allocations in Northern Ireland, most stakeholders had little recollection of its operational details, although a number of those who did recall that system viewed bands as having worked well and cited them as having provided flexibility and a clear structure.

Whilst stakeholders were aware of the use of banding in other jurisdictions within the UK, again overall there was little operational knowledge of these schemes in any detail.

Analysis of key policies and the conclusions drawn from stakeholders showed that there are a number of important issues that need to be taken into consideration when constructing a robust allocation system. These include developing a system that is:

- Based upon clearly defined principles
- Fair and equitable
- Transparent
- Flexible to meet new policy goals and local contexts
- Defensible
✓ Administered effectively and consistently across Northern Ireland

✓ Robust and able to remain so into the longer term.

In conclusion there was agreement that whilst the primary objective of a social housing allocation system should be to meet housing need there was also broad support for it to play a wider role in terms of supporting broader social and economic goals. Stakeholders argued that the HSS in its current form is unable to support these broader policy objectives such as those contained within the Programme for Government 2011-2015 (NIE, 2012). There was a willingness to consider alternative systems for allocating properties (such as CBL) and for methods of prioritising applicants. However, it is imperative that housing professionals are embedded within the decision-making process resulting from a fundamental review of social housing allocations in Northern Ireland. In order for these housing professionals to give informed views on alternative methods of allocating social housing, detailed information must be disseminated on how these alternative methods work in practice.
REFERENCES


ANNEX 1: STAKEHOLDERS CONSULTED

AA Veterans Support
Alliance Party
Apex Housing
Ark Housing Association
Belfast Health Trust
Black and Minority Ethnic (BME) Forum
Chartered Institute of Housing
Clanmil Housing Association
Community Relations Council
Council for the Homeless Northern Ireland
De Paul Ireland
Democratic Unionist Party
Department for Social Development
Disability Forum
Equality Commission
First Housing
Fold Housing Association
Housing Rights Service
Moyle District Council
Northern Ireland Federation of Housing Associations
Northern Ireland Housing and Community Network
Northern Ireland Housing Executive
Oaklee Housing Association
Probation Service of Northern Ireland
Sinn Fein
Social Democratic and Labour Party
Supporting Communities Northern Ireland
Ulidia Housing Association
Ulster Unionist Party
All the data analysed here were supplied by the NIHE on request.

Table 1  Housing applicants by household type and number of points in Northern Ireland (excluding transfers) (1.1.13)

<table>
<thead>
<tr>
<th>Points</th>
<th>Total number on list</th>
<th>Elderly (at least one aged 60+)</th>
<th>Large Adult (3+ adults; 0-1 child)</th>
<th>Large Family (3+ children, or 5+ members)</th>
<th>Single</th>
<th>Couple (no children)</th>
<th>Small Family (1-2 adults and 1-2 children)</th>
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<tr>
<td>0 Pts</td>
<td>8,090</td>
<td>795</td>
<td>154</td>
<td>564</td>
<td>3,401</td>
<td>549</td>
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<td>1-9 Pts</td>
<td>395</td>
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<td>155</td>
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<td>10-19 Pts</td>
<td>4,306</td>
<td>672</td>
<td>111</td>
<td>424</td>
<td>1,389</td>
<td>294</td>
<td>1,416</td>
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<td>20-29 Pts</td>
<td>6,405</td>
<td>950</td>
<td>88</td>
<td>236</td>
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<td>30-39 Pts</td>
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<td>115</td>
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<td>40-49 Pts</td>
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<td>58</td>
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<tr>
<td>50-59 Pts</td>
<td>1,517</td>
<td>320</td>
<td>23</td>
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<td>100</td>
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<td>100-149 Pts</td>
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<td>200-299 Pts</td>
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<td>300+ Pts</td>
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<td>2</td>
<td>25</td>
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<td>8</td>
<td>23</td>
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<td>Total</td>
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<td>19,402</td>
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<td>Stress Total</td>
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<td>1,218</td>
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<td>613</td>
<td>3,039</td>
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</table>

Source: NIHE 2013
Table 2  Transfer housing applicants by household type and number of points in Northern Ireland (1.1.13)

<table>
<thead>
<tr>
<th>Points</th>
<th>Total number on list</th>
<th>Elderly (at least one aged 60+)</th>
<th>Large Adult (3+ adults; 0-1 child)</th>
<th>Large Family (3+ children, or 5+ members)</th>
<th>Single</th>
<th>Couple (no children)</th>
<th>Small Family (1-2 adults and 1-2 children)</th>
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</thead>
<tbody>
<tr>
<td>0</td>
<td>1,136</td>
<td>202</td>
<td>26</td>
<td>124</td>
<td>275</td>
<td>52</td>
<td>457</td>
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<tr>
<td>1-9</td>
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<td>84</td>
<td>5</td>
<td>2</td>
<td>41</td>
<td>12</td>
<td>26</td>
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<td>10-19</td>
<td>2,208</td>
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<td>20-29</td>
<td>2,099</td>
<td>434</td>
<td>49</td>
<td>198</td>
<td>739</td>
<td>119</td>
<td>560</td>
</tr>
<tr>
<td>30-39</td>
<td>1,412</td>
<td>325</td>
<td>32</td>
<td>123</td>
<td>537</td>
<td>73</td>
<td>322</td>
</tr>
<tr>
<td>40-49</td>
<td>718</td>
<td>215</td>
<td>14</td>
<td>73</td>
<td>238</td>
<td>47</td>
<td>131</td>
</tr>
<tr>
<td>50-59</td>
<td>364</td>
<td>119</td>
<td>8</td>
<td>32</td>
<td>115</td>
<td>33</td>
<td>57</td>
</tr>
<tr>
<td>60-69</td>
<td>184</td>
<td>60</td>
<td>4</td>
<td>10</td>
<td>58</td>
<td>12</td>
<td>40</td>
</tr>
<tr>
<td>70-79</td>
<td>115</td>
<td>32</td>
<td>3</td>
<td>8</td>
<td>35</td>
<td>7</td>
<td>30</td>
</tr>
<tr>
<td>80-89</td>
<td>201</td>
<td>38</td>
<td>10</td>
<td>11</td>
<td>75</td>
<td>14</td>
<td>53</td>
</tr>
<tr>
<td>90-99</td>
<td>329</td>
<td>50</td>
<td>6</td>
<td>35</td>
<td>118</td>
<td>15</td>
<td>105</td>
</tr>
<tr>
<td>100-149</td>
<td>1,105</td>
<td>303</td>
<td>40</td>
<td>116</td>
<td>335</td>
<td>57</td>
<td>254</td>
</tr>
<tr>
<td>150-199</td>
<td>83</td>
<td>44</td>
<td>5</td>
<td>6</td>
<td>11</td>
<td>6</td>
<td>11</td>
</tr>
<tr>
<td>200-299</td>
<td>18</td>
<td>1</td>
<td>0</td>
<td>4</td>
<td>10</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>300+</td>
<td>38</td>
<td>3</td>
<td>2</td>
<td>7</td>
<td>14</td>
<td>1</td>
<td>11</td>
</tr>
<tr>
<td>Total</td>
<td>10,180</td>
<td>2,299</td>
<td>244</td>
<td>1,001</td>
<td>3,315</td>
<td>571</td>
<td>2,750</td>
</tr>
<tr>
<td>Stress Total</td>
<td>4,567</td>
<td>1,190</td>
<td>124</td>
<td>425</td>
<td>1,546</td>
<td>266</td>
<td>1,016</td>
</tr>
<tr>
<td>100+ points</td>
<td>1,244</td>
<td>351</td>
<td>47</td>
<td>133</td>
<td>370</td>
<td>65</td>
<td>278</td>
</tr>
</tbody>
</table>

Source: NIHE 2013

Table 3  Allocations and Transfers (NIHE and housing association) by household type (2012)

<table>
<thead>
<tr>
<th>Type of Allocation or Transfer</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elderly (at least one aged 60+)</td>
<td>1,786</td>
</tr>
<tr>
<td>Large adult (3+ adults; 0-1 child)</td>
<td>160</td>
</tr>
<tr>
<td>Large family (3+ children, or 5+ members)</td>
<td>923</td>
</tr>
<tr>
<td>Single</td>
<td>4,498</td>
</tr>
<tr>
<td>Couple (no children)</td>
<td>514</td>
</tr>
<tr>
<td>Small family (1-2 adults and 1-2 children)</td>
<td>3,820</td>
</tr>
<tr>
<td>Total</td>
<td>11,701</td>
</tr>
<tr>
<td>Proportion of all lettings</td>
<td>100%</td>
</tr>
<tr>
<td>Of which transfers</td>
<td>3,378</td>
</tr>
<tr>
<td>Proportion to transfers</td>
<td>29%</td>
</tr>
</tbody>
</table>

Source: NIHE
## Table 4  Annual Allocations (NIHE and housing association) by household type (excluding transfers)

<table>
<thead>
<tr>
<th>Household Type</th>
<th>2006/07</th>
<th>2007/08</th>
<th>2008/09</th>
<th>2009/10</th>
<th>2010/11</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elderly (at least one aged over 60)</td>
<td>1184</td>
<td>1261</td>
<td>1,242</td>
<td>1,263</td>
<td>1,127</td>
</tr>
<tr>
<td>Large adult (3+ adults; 0-1 child)</td>
<td>69</td>
<td>69</td>
<td>86</td>
<td>111</td>
<td>89</td>
</tr>
<tr>
<td>Large family (3+ children or 5+ members)</td>
<td>541</td>
<td>533</td>
<td>505</td>
<td>548</td>
<td>508</td>
</tr>
<tr>
<td>Single adult</td>
<td>2955</td>
<td>2604</td>
<td>3,169</td>
<td>3,780</td>
<td>3,422</td>
</tr>
<tr>
<td>Couple (no children)</td>
<td>388</td>
<td>335</td>
<td>353</td>
<td>359</td>
<td>349</td>
</tr>
<tr>
<td>Small family (1-2 adults &amp; 1-2 children)</td>
<td>2635</td>
<td>2487</td>
<td>2,777</td>
<td>3,131</td>
<td>2,575</td>
</tr>
<tr>
<td>Total</td>
<td>7,772</td>
<td>7,289</td>
<td>8,132</td>
<td>9,192</td>
<td>8,070</td>
</tr>
</tbody>
</table>

*Source: NIHE 2006/7-2010/11*
<table>
<thead>
<tr>
<th>NIHE District</th>
<th>Total allocations</th>
<th>Proportion to housing stress</th>
</tr>
</thead>
<tbody>
<tr>
<td>Omagh</td>
<td>128</td>
<td>67%</td>
</tr>
<tr>
<td>Strabane</td>
<td>136</td>
<td>67%</td>
</tr>
<tr>
<td>Armagh</td>
<td>156</td>
<td>70%</td>
</tr>
<tr>
<td>Lurgan</td>
<td>184</td>
<td>73%</td>
</tr>
<tr>
<td>Belfast 5</td>
<td>205</td>
<td>74%</td>
</tr>
<tr>
<td>Larne</td>
<td>99</td>
<td>77%</td>
</tr>
<tr>
<td>Ballycastle</td>
<td>65</td>
<td>78%</td>
</tr>
<tr>
<td>Cookstown</td>
<td>57</td>
<td>79%</td>
</tr>
<tr>
<td>Ballymoney</td>
<td>79</td>
<td>80%</td>
</tr>
<tr>
<td>Portadown</td>
<td>106</td>
<td>80%</td>
</tr>
<tr>
<td>Fermanagh</td>
<td>152</td>
<td>81%</td>
</tr>
<tr>
<td>Magherafelt</td>
<td>85</td>
<td>82%</td>
</tr>
<tr>
<td>Belfast North</td>
<td>442</td>
<td>87%</td>
</tr>
<tr>
<td>Coleraine</td>
<td>192</td>
<td>89%</td>
</tr>
<tr>
<td>Downpatrick</td>
<td>173</td>
<td>90%</td>
</tr>
<tr>
<td>Limavady</td>
<td>110</td>
<td>90%</td>
</tr>
<tr>
<td>Dungannon</td>
<td>162</td>
<td>91%</td>
</tr>
<tr>
<td>Banbridge</td>
<td>127</td>
<td>92%</td>
</tr>
<tr>
<td>Waterloo Place</td>
<td>66</td>
<td>92%</td>
</tr>
<tr>
<td>Newtownabbey 2</td>
<td>150</td>
<td>93%</td>
</tr>
<tr>
<td>Newry</td>
<td>177</td>
<td>95%</td>
</tr>
<tr>
<td>Belfast South</td>
<td>147</td>
<td>96%</td>
</tr>
<tr>
<td>Waterside</td>
<td>140</td>
<td>96%</td>
</tr>
<tr>
<td>Ballymena</td>
<td>194</td>
<td>97%</td>
</tr>
<tr>
<td>Belfast West</td>
<td>119</td>
<td>97%</td>
</tr>
<tr>
<td>Belfast East</td>
<td>214</td>
<td>98%</td>
</tr>
<tr>
<td>Lisburn</td>
<td>284</td>
<td>98%</td>
</tr>
<tr>
<td>Newtownards</td>
<td>218</td>
<td>98%</td>
</tr>
<tr>
<td>Antrim</td>
<td>187</td>
<td>99%</td>
</tr>
<tr>
<td>Carrickfergus</td>
<td>151</td>
<td>99%</td>
</tr>
<tr>
<td>Castlereagh</td>
<td>219</td>
<td>99%</td>
</tr>
<tr>
<td>Collon Terrace</td>
<td>82</td>
<td>99%</td>
</tr>
<tr>
<td>Bangor</td>
<td>178</td>
<td>100%</td>
</tr>
<tr>
<td>Lisburn Dairyfarm</td>
<td>67</td>
<td>100%</td>
</tr>
<tr>
<td>Newtownabbey 1</td>
<td>112</td>
<td>100%</td>
</tr>
<tr>
<td>Not known</td>
<td>4</td>
<td>0%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>5,367</strong></td>
<td><strong>89%</strong></td>
</tr>
</tbody>
</table>

*Source: NIHE 2010/11*
Table 6 Number of bedrooms required by households on the register (1.1.13), and profile of stock allocated in 2012

<table>
<thead>
<tr>
<th>Number of bedrooms</th>
<th>0-1</th>
<th>2</th>
<th>3</th>
<th>4+</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Allocations</strong></td>
<td>3,120</td>
<td>5,044</td>
<td>3,227</td>
<td>306</td>
<td>11,701</td>
</tr>
<tr>
<td></td>
<td>27%</td>
<td>43%</td>
<td>28%</td>
<td>3%</td>
<td>100%</td>
</tr>
<tr>
<td><strong>Waiting List</strong></td>
<td>30,078</td>
<td>14,047</td>
<td>5,540</td>
<td>2,386</td>
<td>52,051</td>
</tr>
<tr>
<td></td>
<td>58%</td>
<td>27%</td>
<td>11%</td>
<td>5%</td>
<td>100%</td>
</tr>
</tbody>
</table>

*Source: NIHE 2012*

Table 7 Housing association lettings by property types and sizes, 2011/12

<table>
<thead>
<tr>
<th>Property Type</th>
<th>Flat</th>
<th>House</th>
<th>Total</th>
<th>Total %</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-bedroom</td>
<td>295</td>
<td>44</td>
<td>339</td>
<td>14%</td>
</tr>
<tr>
<td>2-bedroom</td>
<td>487</td>
<td>658</td>
<td>1,145</td>
<td>47%</td>
</tr>
<tr>
<td>3+ bedroom</td>
<td>19</td>
<td>946</td>
<td>965</td>
<td>39%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>801</td>
<td>1,648</td>
<td>2,449</td>
<td>100%</td>
</tr>
</tbody>
</table>

*Source: NICORE 2011/12.*

Table 8 Incomes of new housing association lettings, 2011/12

<table>
<thead>
<tr>
<th>Household Income</th>
<th>Number</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under £5,000</td>
<td>367</td>
<td>19%</td>
</tr>
<tr>
<td>£5,000-10,000</td>
<td>567</td>
<td>30%</td>
</tr>
<tr>
<td>£10,000-£15,000</td>
<td>552</td>
<td>29%</td>
</tr>
<tr>
<td>£15,000-£20,000</td>
<td>258</td>
<td>13%</td>
</tr>
<tr>
<td>£20,000-£25,000</td>
<td>89</td>
<td>5%</td>
</tr>
<tr>
<td>£25,000-£30,000</td>
<td>40</td>
<td>2%</td>
</tr>
<tr>
<td>Over £30,000</td>
<td>41</td>
<td>2%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>1,914</td>
<td>100%</td>
</tr>
<tr>
<td><strong>Missing data</strong></td>
<td>799</td>
<td>-</td>
</tr>
</tbody>
</table>

*Source: NICORE 2011/12*
<table>
<thead>
<tr>
<th>Reason Full Homeless Duty owed</th>
<th>Allocations</th>
<th>% of All FDA Allocations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accommodation not reasonable</td>
<td>895</td>
<td>20</td>
</tr>
<tr>
<td>Battered partners/violence</td>
<td>338</td>
<td>7.6</td>
</tr>
<tr>
<td>Bomb/fire damage</td>
<td>12</td>
<td>0.3</td>
</tr>
<tr>
<td>Breakdown of sharing/Family dispute</td>
<td>1,348</td>
<td>30</td>
</tr>
<tr>
<td>Child ex-care</td>
<td>24</td>
<td>0.5</td>
</tr>
<tr>
<td>Fire/flood/other emergency</td>
<td>27</td>
<td>0.6</td>
</tr>
<tr>
<td>Hospital discharge</td>
<td>14</td>
<td>0.3</td>
</tr>
<tr>
<td>Intimidation(^\text{17})</td>
<td>189</td>
<td>4.2</td>
</tr>
<tr>
<td>Loss of NIHE accommodation</td>
<td>6</td>
<td>0.1</td>
</tr>
<tr>
<td>Loss of private rented accommodation</td>
<td>433</td>
<td>10</td>
</tr>
<tr>
<td>Mortgage arrears</td>
<td>72</td>
<td>1.6</td>
</tr>
<tr>
<td>Neighbourhood harassment</td>
<td>356</td>
<td>8</td>
</tr>
<tr>
<td>No accommodation in Northern Ireland</td>
<td>178</td>
<td>4</td>
</tr>
<tr>
<td>Other action</td>
<td>102</td>
<td>2.3</td>
</tr>
<tr>
<td>Relationship breakdown</td>
<td>399</td>
<td>9</td>
</tr>
<tr>
<td>Release from prison</td>
<td>20</td>
<td>0.5</td>
</tr>
<tr>
<td>Sexual abuse/violence</td>
<td>40</td>
<td>0.9</td>
</tr>
<tr>
<td>No data</td>
<td>6</td>
<td>0.1</td>
</tr>
<tr>
<td><strong>All Allocations by NIHE to Homeless Applicants</strong></td>
<td><strong>4,459</strong></td>
<td><strong>100</strong></td>
</tr>
</tbody>
</table>

Source NIHE2012

\(^{17}\) Intimidation includes a range of reasons (e.g. categories related to areas such as ASB, Disability, Paramilitary, Racial, Sectarian and Sexual Orientation)
Table 10  Reason for housing for allocations into NIHE stock (excluding Full Duty Homeless Applicants) (2012)

<table>
<thead>
<tr>
<th>Reason advised by applicant when applying for accommodation</th>
<th>Allocations</th>
<th>% of all non FDA Allocations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dislikes current location</td>
<td>53</td>
<td>2.5</td>
</tr>
<tr>
<td>Family dispute/share breakdown</td>
<td>52</td>
<td>2.5</td>
</tr>
<tr>
<td>Financial reasons</td>
<td>56</td>
<td>2.6</td>
</tr>
<tr>
<td>Health/disability</td>
<td>79</td>
<td>3.7</td>
</tr>
</tbody>
</table>
| Homeless (or threatened with) 
18                                                                 | 185         | 8.7                          |
| Lacking amenities/disrepair                                  | 18          | 0.8                          |
| Move near family/friends                                    | 30          | 1.4                          |
| Move near school/work                                       | 6           | 0.2                          |
| Neighbour dispute                                           | 37          | 1.7                          |
| Over/under occupation                                       | 99          | 4.6                          |
| Property compulsory acquired                                 | 6           | 0.2                          |
| Relationship breakdown                                      | 53          | 2.5                          |
| Release from prison                                         | 2           | 0.09                         |
| Wants independent accommodation                             | 64          | 3.0                          |
| Wants secure tenancy                                        | 994         | 46.9                         |
| Information not collected                                    | 382         | 18.0                         |
| Total allocations to NIHE stock                             | 2,116       | 100.0                        |

Source NIHE 2012

Table 11  Reason for housing into housing association stock by type of letting, 2011/12

<table>
<thead>
<tr>
<th>Reason for allocation to HA stock</th>
<th>New let</th>
<th>Relet</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Problems related to accommodation</td>
<td>261</td>
<td>25%</td>
<td>183</td>
</tr>
<tr>
<td>Problems related to relationships</td>
<td>76</td>
<td>7%</td>
<td>103</td>
</tr>
<tr>
<td>Problem related to health</td>
<td>73</td>
<td>7%</td>
<td>115</td>
</tr>
<tr>
<td>Problems related to work/income</td>
<td>12</td>
<td>1%</td>
<td>15</td>
</tr>
<tr>
<td>Wish to be near family, school, work etc.</td>
<td>80</td>
<td>8%</td>
<td>97</td>
</tr>
<tr>
<td>Re-housing from temporary accommodations</td>
<td>11</td>
<td>1%</td>
<td>50</td>
</tr>
<tr>
<td>Other</td>
<td>137</td>
<td>13%</td>
<td>185</td>
</tr>
<tr>
<td>Problem related to neighbourhood</td>
<td>40</td>
<td>4%</td>
<td>59</td>
</tr>
<tr>
<td>Intimidation</td>
<td>83</td>
<td>8%</td>
<td>112</td>
</tr>
<tr>
<td>To move to independent accommodation</td>
<td>287</td>
<td>27%</td>
<td>404</td>
</tr>
<tr>
<td>Total</td>
<td>1,060</td>
<td>100%</td>
<td>1,323</td>
</tr>
</tbody>
</table>

Source:  NICORE 2011/12.

---

18 N.B. These statistics relate to applicants who at point of application stated homelessness as their reason for applying but were subsequently not awarded FDA homeless status
Table 12  Reason for housing by religious background, housing association lettings 2011/12

<table>
<thead>
<tr>
<th>Reason for allocation to HA stock</th>
<th>Protestant</th>
<th>Catholic</th>
<th>Mixed</th>
<th>No religious belief</th>
<th>Other/not stated/missing</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Problems with accommodation</td>
<td>68</td>
<td>256</td>
<td>1</td>
<td>22</td>
<td>87</td>
<td>434</td>
</tr>
<tr>
<td>Relationship breakdown</td>
<td>41</td>
<td>85</td>
<td>0</td>
<td>8</td>
<td>39</td>
<td>173</td>
</tr>
<tr>
<td>Problems with health</td>
<td>47</td>
<td>78</td>
<td>1</td>
<td>8</td>
<td>52</td>
<td>186</td>
</tr>
<tr>
<td>Affordability problems</td>
<td>6</td>
<td>12</td>
<td>0</td>
<td>0</td>
<td>6</td>
<td>24</td>
</tr>
<tr>
<td>Wish to be near family, school, work etc</td>
<td>25</td>
<td>110</td>
<td>1</td>
<td>6</td>
<td>32</td>
<td>174</td>
</tr>
<tr>
<td>Rehousing from hostel, hospital or other institution</td>
<td>9</td>
<td>32</td>
<td>1</td>
<td>3</td>
<td>15</td>
<td>60</td>
</tr>
<tr>
<td>Other</td>
<td>53</td>
<td>140</td>
<td>1</td>
<td>8</td>
<td>113</td>
<td>315</td>
</tr>
<tr>
<td>Problems with neighbourhood</td>
<td>21</td>
<td>47</td>
<td>1</td>
<td>6</td>
<td>22</td>
<td>97</td>
</tr>
<tr>
<td>Intimidation</td>
<td>32</td>
<td>107</td>
<td>2</td>
<td>14</td>
<td>36</td>
<td>191</td>
</tr>
<tr>
<td>Desire independence</td>
<td>149</td>
<td>349</td>
<td>1</td>
<td>23</td>
<td>142</td>
<td>664</td>
</tr>
<tr>
<td>Total</td>
<td>451</td>
<td>1216</td>
<td>9</td>
<td>98</td>
<td>544</td>
<td>2318</td>
</tr>
</tbody>
</table>

Source: NICORE 2011/12

Table 13  Number of working-age new tenants who were under-occupying in housing association lettings by number of bedrooms, 2011/12

<table>
<thead>
<tr>
<th>No. of bedrooms</th>
<th>Overcrowded</th>
<th>At standard</th>
<th>1 room over standard</th>
<th>2+ rooms over standard</th>
<th>Total under-occupying</th>
<th>Total allocations</th>
<th>Proportion under-occupying</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>12</td>
<td>499</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>511</td>
<td>0%</td>
</tr>
<tr>
<td>2</td>
<td>24</td>
<td>515</td>
<td>542</td>
<td>0</td>
<td>542</td>
<td>1,081</td>
<td>50%</td>
</tr>
<tr>
<td>3</td>
<td>64</td>
<td>341</td>
<td>391</td>
<td>65</td>
<td>456</td>
<td>861</td>
<td>53%</td>
</tr>
<tr>
<td>4</td>
<td>8</td>
<td>39</td>
<td>28</td>
<td>7</td>
<td>35</td>
<td>82</td>
<td>43%</td>
</tr>
<tr>
<td>5+</td>
<td>0</td>
<td>1</td>
<td>3</td>
<td>3</td>
<td>6</td>
<td>7</td>
<td>86%</td>
</tr>
<tr>
<td>Total</td>
<td>108</td>
<td>1,395</td>
<td>964</td>
<td>75</td>
<td>1,039</td>
<td>2,542</td>
<td>41%</td>
</tr>
</tbody>
</table>

Source: NICORE 2011/12
### Table 14  
**Number of working-age new tenants eligible for full or partial Housing Benefit who were under-occupying in housing association lettings by number of bedrooms, 2011/12**

<table>
<thead>
<tr>
<th>No. of bedrooms</th>
<th>Overcrowded</th>
<th>At standard</th>
<th>1 room over standard</th>
<th>2+ rooms over standard</th>
<th>Total under-occupying</th>
<th>Total allocations</th>
<th>Proportion under-occupying</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>8</td>
<td>248</td>
<td>0</td>
<td>0</td>
<td>256</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>2</td>
<td>16</td>
<td>398</td>
<td>429</td>
<td>0</td>
<td>429</td>
<td>843</td>
<td>51%</td>
</tr>
<tr>
<td>3</td>
<td>47</td>
<td>267</td>
<td>296</td>
<td>50</td>
<td>346</td>
<td>660</td>
<td>52%</td>
</tr>
<tr>
<td>4</td>
<td>6</td>
<td>35</td>
<td>21</td>
<td>5</td>
<td>26</td>
<td>67</td>
<td>39%</td>
</tr>
<tr>
<td>5</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>3</td>
<td>4</td>
<td>4</td>
<td>100%</td>
</tr>
<tr>
<td>6</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>77</strong></td>
<td><strong>949</strong></td>
<td><strong>747</strong></td>
<td><strong>58</strong></td>
<td><strong>805</strong></td>
<td><strong>1,831</strong></td>
<td><strong>44%</strong></td>
</tr>
</tbody>
</table>

*Source: NICORE 2011/12*

### Table 15  
**Number of new working age tenants who were under-occupying in General Needs lettings in England by household type, 2011/12**

<table>
<thead>
<tr>
<th>No. of bedrooms</th>
<th>Overcrowded</th>
<th>At standard</th>
<th>1 room over standard</th>
<th>2+ rooms over standard</th>
<th>Total under-occupying</th>
<th>Total allocations</th>
<th>Proportion under-occupying</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1,063</td>
<td>71,411</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>72,474</td>
<td>0%</td>
</tr>
<tr>
<td>2</td>
<td>1,690</td>
<td>53,289</td>
<td>29,970</td>
<td>1</td>
<td>29,971</td>
<td>84,950</td>
<td>35%</td>
</tr>
<tr>
<td>3</td>
<td>4,021</td>
<td>24,638</td>
<td>17,568</td>
<td>3,317</td>
<td>20,885</td>
<td>49,544</td>
<td>42%</td>
</tr>
<tr>
<td>4</td>
<td>730</td>
<td>2,314</td>
<td>1,606</td>
<td>258</td>
<td>1,864</td>
<td>4,908</td>
<td>38%</td>
</tr>
<tr>
<td>5+</td>
<td>82</td>
<td>178</td>
<td>195</td>
<td>85</td>
<td>280</td>
<td>540</td>
<td>52%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>7,586</strong></td>
<td><strong>151,830</strong></td>
<td><strong>49,339</strong></td>
<td><strong>3,661</strong></td>
<td><strong>53,000</strong></td>
<td><strong>212,416</strong></td>
<td><strong>25%</strong></td>
</tr>
</tbody>
</table>

*Source: CORE General Needs HA and LA 2011/12*