

Housing Rights

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Consultation response

Response to Consultation on NIHE Community Involvement and Cohesion Strategy 2024-29

July 2024

Introduction

Housing Rights is Northern Ireland's leading independent provider of specialist housing advice. For over 60 years, we have been helping people find and keep a home. We believe that prevention is better than the cure and work to prevent homelessness wherever possible.

At Housing Rights, we believe it is key that experts by experience (people with experience of poor housing and homelessness) are meaningfully involved in decisions made about preventing and ending homelessness.

The Northern Ireland Housing Executive (NIHE) has recently consulted on their new [Draft Community Involvement and Cohesion Strategy](#). Housing Rights response to the online consultation survey is detailed below.

Online consultation survey response

1. Do you agree with the vision of 'Enable and engage communities to interact and work together to co-design Housing Executive services and embrace a more cohesive society'?

Yes

Do you have any further comments?

Housing Rights agrees with the above vision but would suggest that it could be strengthened by adding co-design of NIHE policy and services. We welcome the commitment in the Strategy to involve people using NIHE services in scrutinising and shaping policy, and we recommend that this is included in the vision. For example, an updated vision could state, '... to co-design Housing Executive policy and services ...'.

2. Do you agree with Aim 1 and the relevant Principles that will guide the delivery of the Strategy?

- **Aim 1: ENABLE our communities to promote and strengthen involvement**
Yes
- **1.1: Strengthening local engagement**
Yes
- **1.2: Developing and maintaining a support infrastructure to sustain community organisations**
Yes

Do you have any further comments?

1. Involvement of underrepresented groups

Whilst Housing Rights supports Aim 1, we believe more emphasis should be placed on involving groups currently underrepresented in NIHE community engagement activities. We welcome the commitment to “Encourage involvement from all sections of the community, particularly people and groups that are often missed out on community engagement activities.” Furthermore, we commend the work undertaken by the NIHE in partnership with Rural Community Network, Disability Action NI and the Northern Ireland Youth Forum to involve rural communities, people with disabilities and young people in NIHE decision-making processes. We also welcome the fact that an LGBTQIA+ representative from the Rainbow project has been included in the Central Housing Forum. However, **Housing Rights believes that to realise the above aim, specific focus should be given to involving other underrepresented groups, particularly those identified in the evaluation of the current Strategy.** This evaluation recommended NIHE should “focus future efforts on broadening the participation of LGBTQIA+ and culturally diverse groups including travellers, refugees, economic migrants and asylum seekers.” However, none of these groups are mentioned in either the aims or action plan for the new Strategy.

To inform our response to this consultation, Housing Rights carried out a focus group discussion with nine experts by experience (who have first-hand experience of housing problems and homelessness) from the Northern Ireland Somali Association, who we support through our Community Housing Advice Partnership. We asked participants to respond to the statement ‘When I speak about housing problems and homelessness the Housing Executive listens to me’. Seven of the participants strongly disagreed (6) or disagreed (1) with this statement, and two agreed. Those who agreed spoke about how they felt listened to on an operational level regarding their specific cases but not at a policy level. When we asked participants whether there were things they would like to change about NIHE’s policies and services, all nine participants strongly agreed. They explained that they know what the issues are and what needs to change. However, when we asked if they knew what opportunities there are to get involved in influencing NIHE’s work, eight strongly disagreed, and one disagreed. One participant simply commented “you can’t”, explaining that he feels there is no way to get involved in influencing change within NIHE. We followed up by asking if any of the participants had heard of the Housing Community Network and the Central Housing Forum, and they all responded that they had not heard of either structure. When asked if they think it is important that the Housing Executive listen to the views of refugees, asylum seekers and other migrant communities to improve their services, all nine participants strongly agreed. Participants spoke about

how they would like NIHE to listen to the views of migrant communities. One explained that NIHE needs to hear from refugees and asylum seekers as the additional complexities in their experiences (such as the trauma of having to flee their countries, language barriers, and hate crime) make their housing issues even more difficult.

The views and insights of the above focus group were reflective of the findings of research Housing Rights commissioned Involve to carry out in 2022 entitled, '[Putting the 'Us' in Housing](#)', which analysed the meaningful involvement of affected groups in decisions made about housing and homelessness in Northern Ireland. The research highlighted the significant overlap between the groups who experience poor housing and homelessness and groups who face barriers to involvement in decisions about housing policy and service design. Housing Rights believes this makes it even more imperative that proactive measures are taken to ensure that NIHE engages with underrepresented groups, as they are among those most acutely impacted by policy and service decisions made by NIHE.

Housing Rights commends the work undertaken by NIHE and Supporting Communities to engage with social tenants through the Housing Community Network (HCN) and supports the ongoing commitment to this work in the new Strategy. The HCN provides a crucial and strong engagement platform for social tenants who can engage in a formal structure. However, in our experience, a variety of engagement methods are required to meet different groups' needs. Indeed, the Involve research found that in participation in the social rented sector in Northern Ireland (NI) there is an overreliance on traditional approaches to engagement, which will, by default, exclude many of the people who are both vulnerable to poor housing and homelessness and in a group that is considered, 'easy to ignore.'

Housing Rights notes that while the Draft Strategy states that in the NIHE Tenant Participation Research, 95% of respondents were satisfied with current opportunities to become involved, this is not an accurate reflection of the research findings. Only 26% of respondents said they were satisfied with the current opportunities to become involved and participate in their communities or provide feedback on services. The majority of respondents (55%) stated that they had no opinion, while 13% responded that they were neither satisfied nor dissatisfied, and 5% responded they were dissatisfied. Furthermore, the research found that approximately 75% of the tenant population has little interest in becoming involved in a local community group, panels or forums organised by NIHE. **Housing Rights recommends that the Strategy be amended to reflect the accurate statistics from the NIHE Tenant Participation Research and that corresponding aims and actions be included to significantly expand the methods of engagement to engage a wider proportion of the tenant population.** Housing Rights suspects that many of the 68% who stated that they had no opinion, or that they were neither satisfied

nor dissatisfied, are not aware of the current opportunities to engage and/or are unable to access them. Indeed, none of the participants we spoke to at the Northern Ireland Somali Association had heard of the Housing Community Network or the Central Housing Forum, nor were any of them aware of opportunities to get involved in influencing NIHE's work.

Housing Rights welcomes the commitment of the Draft Strategy to "Promote variety, flexibility and choice in community engagement activities." However, **we recommend that the corresponding action in the year one action plan is strengthened to include actions to work specifically with underrepresented groups, including the Irish Traveller Community, LGBTQIA+ people, people with refugee status, people seeking asylum (who will be transitioning from Mears accommodation) and other migrant communities, to co-design structures for engagement that would enable them to be involved.** One of the key recommendations in the Involve research is for decision-makers to build strong connections with and support civil society groups who are already working with people who have experience of poor housing and homelessness in order to involve groups who have barriers to engagement. **Housing Rights recommends that NIHE partners with organisations that are supporting the above-mentioned groups to facilitate their meaningful involvement.**

The involvement of underrepresented groups is crucial to realising the vision of the Strategy as well as meeting NIHE's legislative obligations with regard to direct consultation with people likely to be affected by a policy decision. Indeed, section 75 of the Northern Ireland Act 1998 places a statutory obligation on designated public authorities to carry out consultation with those likely to be impacted as a result of policy proposals. In the view of Housing Rights', the current aims and actions of the Strategy fail to ensure that this legal requirement will be met.

2. Monitoring and evaluation

In order to ensure NIHE community engagement is both accessible and representative of the different groups living in NI, **Housing Rights strongly recommends that the draft Strategy be amended to include a greater emphasis on the monitoring and evaluation of engagement activities.** The Involve research found that whilst there is an established practice of participation in the Social Rented Sector in Northern Ireland there is inconsistency across the sector, and an absence of data on diversity, inclusion or representativeness of current participatory activities. It also identified gaps in the evaluation of tenant involvement with regard to how accessible current opportunities are to groups who are systematically excluded.

Housing Rights notes the research carried out by NIHE to feed into this Strategy, including the Tenant Participation Research, Tenant Segmentation Research, HCN Survey and the Continuous Tenant Omnibus Survey, are all focused on the experiences of social tenants (except for the limited number of private renters/leaseholders involved in community groups in the HCN structure).

Housing Rights sees it as crucial that the new Strategy’s approach to ‘Measuring our success’ is strengthened. This should include not only capturing disaggregated data, in line with the requirements of section 75 of the Northern Ireland Act 1998, on those involved, but also an analysis of the extent to which it reflects the population impacted by the decisions made by NIHE. The monitoring and evaluation processes should also capture the experiences not only of those who are involved in current engagement opportunities, but also the experiences and views of people for whom the existing structures have not been accessible, or who have not engaged for another reason. Furthermore, these processes should monitor the impact that Community Involvement has on decisions made regarding NIHE policies and services, to ensure involvement is meaningful and used to inform NIHE decisions. This is particularly important in ensuring compliance with the statutory obligation under Schedule 9 paragraph 9(2) of the Northern Ireland Act 1998, on all public authorities to take into account the views of consultees in consultations carried out in relation to a policy. A firm commitment to this is also included within NIHE’s approved Equality Scheme.¹

3. Training for staff

Housing Rights believes it is important that Housing Executive staff in decision-making roles throughout the organisation have a strong understanding of participation and the skills and knowledge of how to develop accessible opportunities for people to participate. Indeed, the Involve research highlighted the importance of capacity building on participation for those working within decision-making structures. The research notes that high-quality participation requires skills, knowledge, and experience to respond to different policy contexts and develop inclusive and accessible opportunities for people to participate. **Housing Rights therefore recommends that Aim 1 is strengthened by including a commitment to providing participation training to NIHE staff in decision-making roles, with a corresponding action to provide this training to staff in the Year 1 action plan.** In our view, it is important that staff are trained within the first year of the Strategy to ensure that aims and actions are realized to maximum effect.

¹ [The-Equality-Scheme.pdf \(nihe.gov.uk\)](#) Para 3.2.10

3. Do you agree with Aim 2 and the relevant Principles that will guide the delivery of the Strategy?

- **Aim 2: ENGAGE our communities to influence, shape and improve our services**
Yes
- **2.1: Strengthening strategic engagement**
Yes
- **2.2: Providing opportunities for communities to shape and influence the development and delivery of quality services**
Yes
- **2.3: Engaging and educating our communities in terms of climate change and net zero ambitions and contribute to the delivery of the Corporate Sustainable Development Strategy**
Yes

Do you have any further comments?

1. Greater focus on involving underrepresented groups

Housing Rights strongly welcomes the commitments under this aim to strengthen strategic engagement and to provide opportunities for communities to shape and influence the development and delivery of quality services. We further welcome the commitment to provide a variety of mechanisms for tenants and customers to shape and influence services within and outside the HCN structure. For the reasons outlined in response to Q8 (particularly the findings of the Involve research and the views shared during our focus group with the NI Somali Association), **Housing Rights strongly recommends that Aim 2 be updated to include a specific commitment to developing new ways to involve underrepresented groups, including the Irish Traveller Community, LGBTQIA+ people, people with refugee status and other migrant communities. This should include a commitment to involving these groups in designing engagement mechanisms that are accessible and inclusive.**

The need for NIHE to ensure this Strategy focuses on involving underrepresented groups is even more important given that other strategic commitments to involve these groups have not been met. For example, the NIHE has not met their Strategic commitment in their Irish Travellers Accommodation Strategy to 'Develop opportunities for Irish Traveller engagement and participation within our Housing Services' and to 'Establish bespoke capacity building training and practicable methods for Irish Traveller participation,' by March 2023.

Housing Rights welcomes the commitment to supporting the initiation of 3 resident scrutiny panels in year 1 of the Strategy and recommends that at least one of these panels is focused on one of the underrepresented groups listed above. The functioning of such a panel should again be co-designed with these groups.

Again, the above recommendations are particularly important with regard to meeting NIHE's obligations under section 75 of the Northern Ireland Act 1998 to carry out consultation with those likely to be impacted upon as a result of policy proposals. Indeed, the NIHE's approved Equality Scheme commits to considering the accessibility and format of every method of consultation used in order to remove barriers to the consultation process.

2. Involvement of people using NIHE services who have not yet been able to access social housing

Housing Rights welcomes the commitment in the draft Strategy to 'Engage and facilitate our customers to scrutinise key policy areas and service delivery.' Alongside NIHE tenants, NIHE customers include private renters, low-income homeowners and people experiencing homelessness. For example, people who present as homeless to NIHE but are unable to access social housing due to the acute shortage of social homes, private renters applying for Discretionary Housing Payments, and private renters or homeowners applying for support from NIHE schemes such as the affordable warmth scheme.

However, Housing Rights notes with concern the lack of any mention in the draft Strategy of ways in which NIHE will engage with people who are not social tenants (except for the limited number of private renters/leaseholders involved in HCN community groups). Indeed, while the Central Housing Forum provides a strong platform for social tenants and leaseholders to advise on NIHE policy, procedures and service delivery, the Strategy does not include mechanisms for people who have experienced homelessness to influence NIHE homelessness policy or services. Nor is provision made for low-income private renters to influence NIHE policies. Nevertheless, these groups are often among those most acutely impacted by NIHE decisions. For example, people experiencing homelessness and private renters who are on the social housing waiting list are among those most acutely affected by NIHE policies regarding social housing allocations.

In March 2023, Housing Rights and Homeless Connect facilitated workshops with 37 people with experience of homelessness to inform the development of an NIHE Lived Experience Programme, which NIHE has committed to in its 2022-27 Homelessness Strategy. 100% of participants said that they think it is important for decision-makers to listen to people with lived experience. However, when asked if they felt listened to when they spoke up about homelessness, 81% said they did not. Furthermore, of the 11% who

said that they did feel listened to, most spoke about being listened to by other services outside of NIHE. The fact that the Homelessness Strategy is in its third year and the Lived Experience Programme is not in place, makes it even more important that engagement with people with experience of homelessness is included in the Community Involvement and Cohesion Strategy.

Housing Rights notes that the draft Strategy states that it will provide the roadmap to achieve the NIHE's commitment in their Corporate Plan 'Inclusion and Involvement of our customers in decisions and services that affect their lives.' In Housing Rights' view, this roadmap will be insufficient if it fails to include the involvement of customers who are not social tenants. These gaps were also highlighted in the Involve research, which found that "for those made most vulnerable by their housing situation, including those on low incomes in the private rented sector and those who experience homelessness, there are few formal avenues through which they can influence decisions that affect them."

Housing Rights, therefore, strongly recommends that either the draft Strategy is amended to also cover the involvement of people experiencing homelessness, private renters and low-income homeowners or that it includes a commitment to the timely development of a separate strategy or strategies to engage with these groups. In order to ensure it meets the needs of these groups, Housing Rights strongly recommends that NIHE co-design the approach taken with each of these groups. Existing groups, such as Renters' Voice, a group of private renters campaigning for improvements across the private rented sector in Northern Ireland, would be well placed to support NIHE with co-designing their approach.

Again, due to the range of demographic groups who are impacted upon by NIHE policies and services, the above recommendations are crucial in meeting the NIHE's obligations under section 75 of the Northern Ireland Act 1998 to carry out consultation with those likely to be impacted upon as a result of policy proposals, and fulfilling the commitments in the NIHE's approved Equality Scheme.

3. Paying people for their time

Where people who have first-hand experience of housing problems or homelessness are sharing their expertise and insights to help the NIHE improve their policies and services, **we recommend that the NIHE recognises this expertise and thanks people for their time, for example through provision of gift vouchers.**

4. Climate change research

Housing Rights' welcomes NIHE's commitment in the draft Strategy to 'Engage and educate communities in terms of climate change and net zero ambitions communities

and contribute to the delivery of the Corporate Sustainable Development Strategy.’ This is another key area where it is crucial that engagement reaches beyond NIHE tenants, particularly private renters and low-income homeowners who are impacted directly by the Corporate Sustainable Development Strategy and the transition to net zero. Indeed, Housing Rights has recently commissioned Social Market Research to carry out research (due to be published in September 2024) on a just transition to ‘net zero’ for low-income households in the homeowner and private rented sectors. **Housing Rights recommends that Aim 2 of the Strategy is therefore updated to include a commitment to involving private renters and low-income homeowners in this area, alongside a corresponding action in the year 1 action plan.**

10. Do you agree with Aim 3 and the relevant Principles that will guide the delivery of the Strategy?

Aim 3: EMBRACE community cohesion within and between our communities

- **3.1: Working in partnership with others to address the complex housing needs of a divided society**
Yes
- **3.2: Encouraging improved race relations**
Yes
- **3.3: Encouraging cohesion at a community level**
Yes
- **3.4: Contributing to the creation of more stable, safer and cohesive neighbourhoods**
Yes

Do you have any further comments?

Housing Rights supports the above aims and believes that our recommendations detailed above with regard to involving underrepresented groups, as well as people living in different tenures, will help to strengthen cohesion in each of these areas.

11. What do you believe should be prioritised in the Year 1 Action Plan?

For the reasons outlined in this response, we believe the following actions should be added and prioritised in the Year 1 Action Plan:

- **Develop new ways to engage with underrepresented groups, including the Irish Traveller Community, LGBTQIA+ people, people with refugee status and other migrant communities.** These groups should be involved in co-

designing the structures that would enable their engagement. Housing Rights recommends that the NIHE partners with organisations that are supporting the above-mentioned groups, to facilitate their involvement.

- **Support the development of a scrutiny panel specifically focused on the issues facing at least one underrepresented group**, such as the Irish Traveller Community. We recommend that scrutiny panels with other underrepresented groups are also included in the action plans for years 2 and 3 of the Strategy.
- **Develop new ways to involve NIHE customers who are not social tenants outside of the HCN structure, including people experiencing homelessness, private renters and low-income homeowners.** Again, these groups should be involved in co-designing structures that would enable their engagement.
- **Develop a framework to monitor and evaluate involvement in NIHE Community Involvement engagements**, which captures:
 - o the demographics of those involved, and the extent to which this reflects the population impacted by the decisions made by NIHE
 - o the experiences of those involved in NIHE engagements, as well as the experiences and views of people for whom the existing structures have not been accessible or who have not engaged for another reason.
 - o the impact that NIHE Community Involvement engagements have had on decisions made by NIHE regarding policy and services
- **Provide participation training for NIHE staff in decision-making roles.** Public participation organisations such as Involve would be well placed to provide such training.

12. Do you agree with the definitions of Community Involvement and Cohesion?

No

Community Cohesion places an emphasis on the need for strong and positive relationships between people from different backgrounds to break down barriers and support diversity.

Community involvement is when you share your voice, time and skills to build better communities in partnership with others.

Whilst Housing Rights agrees broadly with the above definitions, **we believe that the definition of Community Involvement should be expanded to reflect NIHE's responsibility to involve people.** For example, the definition could be amended to

read: 'Community involvement is when NIHE ensures people who use their services or are impacted by their policies have a platform to influence decisions and to use their voice, time and skills to build better communities in partnership with others.'

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