



Participation and the Practice of Rights Submission to the Committee on Economic, Social and Cultural Rights before the United Kingdom of Great Britain and Northern Ireland's February 2025 hearing

About PPR

Participation and the Practice of Rights (PPR) is a human rights NGO founded in 2006. Based in Belfast, PPR organises with a growing network of communities across the island of Ireland and the UK, supporting people to use human rights as tools to fight for economic, social and environmental changes that improve their lives.

This submission follows on from that of January 2023.

1. Maximum available resources (art. 2 (1))

1.1 Political and financial context

Northern Ireland was without a functioning Executive or Assembly between February 2022 and February 2024 following the withdrawal of the DUP from government over the UK's Brexit deal. Sitting ministers remained as 'caretakers' until end October 2022; after that the UK's Secretary of State for Northern Ireland became responsible for the NI budget, while departments were run by civil servants, with many decisions made without elected political oversight or deferred. (For the past decade the political situation in NI has forced it to operate on single-year budgets only, rather than receiving a multi-year block grant that would allow for longer-term planning¹.)

In December 2023 the UK government and NI political parties negotiated a financial package in advance of the return to Stormont². The UK Treasury reportedly agreed to write off £559 million worth of NI debt if Stormont operated a balanced budget in 2024/25³. This requirement meant departments faced substantial reductions against the funding they had

¹ <https://www.belfastlive.co.uk/news/northern-ireland/mps-warned-stormont-financial-cliff-30736209>

² NI Fiscal Council, Northern Ireland's public finances and the UK Government's financial support package for the restored Executive, 2024 at <https://www.nifiscalcouncil.org/files/nifiscalcouncil/documents/2024-02/NI%20public%20finances%20and%20the%20UK%20Government%27s%20financial%20support%20package%20for%20the%20restored%20Executive%20-%20web%20version%2015.02.24.pdf> p. 1

³ <https://www.rte.ie/news/2024/0910/1469395-northern-ireland-budget/>

requested⁴. Accordingly, a strict austerity budget was announced⁵ in April and passed⁶ by legislators in May. Its impact was significant: to take the example of social homebuilding, authorities announced that they only had funds to start 400 new units, despite an existing target of 2,000 (and a much greater again level of need)⁷.

The UK government's October 2024 budget⁸ included a higher-than-expected additional £640m in 'Barnett consequentials'⁹. NI's 2025/26 budget rose to £18.2b; NI's Finance Minister welcomed the increase but drew attention to the impact of long-term underfunding, commenting, "the harm done by austerity was never going to be reversed by one Budget"¹⁰. This recognition is positive. However, it remains doubtful, on past performance, whether the Stormont government – which in December 2024 opened public consultation¹¹ on the next year's proposed budget-- will fully comply with the ICESCR requirement to allocate the maximum available resources to ensure progressive realisation of the rights addressed below.

Outwith the impact of regressive funding decisions, it is also clear that other resources are not being mobilised for the benefit of rights holders. For example, large quantities of public land lie unused in the context of the most severe housing shortage in the north. The Take Back the City coalition continues to argue for land justice for homeless families through our campaign to build homes on the 13-hectare Mackies' site.¹²

⁴ House of Commons NI Affairs Committee, The funding and delivery of public services in Northern Ireland, 2024 at <https://committees.parliament.uk/publications/44014/documents/218038/default/> p. 3: "The funding and delivery of public services in Northern Ireland are under enormous pressure, with reduced budgets, unreformed systems and, until recently, an absence of Ministers all contributing to the current crisis".

⁵ <https://www.finance-ni.gov.uk/news/executive-agrees-2024-25-budget>

⁶ <https://www.bbc.co.uk/news/articles/cj55qz0dp81o>

⁷ A July 2024 monitoring round saw an additional allocation of around £300m from Westminster but this was not enough to alleviate funding shortfalls (see <https://www.bbc.co.uk/news/articles/czrj7wyer1xo>); to take our example of new social home starts, the figure rose from 400 to 600 (see <https://www.housingtoday.co.uk/news/housing-sector-welcomes-northern-ireland-draft-programme-for-government-as-starting-point/5131501.article>). The autumn budget resulted in an additional £24m for social housing and the target was raised accordingly, to 1,400 (see <https://www.insidehousing.co.uk/news/northern-ireland-housing-bodies-welcome-new-funding-but-warn-significant-gap-remains-89299>).

⁸ <https://www.belfastlive.co.uk/news/northern-ireland/budget-announcement-rachel-reeves-live-30258753>

⁹ These are increases in funding allocated to NI which arise when UK government spending rises in Great Britain in areas that NI Departments are responsible for delivering here (See NI Fiscal Council, The NIO's 2023-24 Budget for Northern Ireland: initial summary, 2023 at <https://www.nifiscalcouncil.org/files/nifiscalcouncil/documents/2023-05/The%20NIO%27s%20202324%20Budget%20for%20Northern%20Ireland%20initial%20summary%20-%20web%20version%2005.05.23%20v2.pdf>.) Of these additional funds, £30m was capital funding and the rest for day-to-day spending under NI's 2024/25 budget.

¹⁰ <https://www.finance-ni.gov.uk/news/funding-announced-wont-undo-damage-caused-austerity-archibald>

¹¹ <https://www.northernireland.gov.uk/news/executive-agrees-2025-26-draft-budget>

¹² For further information please see <https://www.takebackthecity.ie/>

1.2 Socio economic context

Despite the provisions of guidance such as a Human Rights Based Approach to Data (2018)¹³, up-to-date, detailed data on deprivation in NI is not available¹⁴. (More recently, NI's 2021 census did gather limited data as a measure of deprivation, but in four areas only-- education, employment, health and housing – using very broadbrush indicators of 'deprivation'¹⁵.)

Appendix 1 includes a mapping of 2021 census data on deprivation in each local government/council area in Northern Ireland.)

Despite the lack of a current detailed dataset, some existing information is indicative of worrying levels of deprivation in NI. In the area of health, for instance, the NISRA / Department of Health's Health Inequalities: Annual Report 2024¹⁶ reported gaps in healthy life expectancy between most and least deprived areas of 12.2 years (males) and 14.2 (females). March 2024 analysis from the NI Audit Office¹⁷ found that one fifth of children are growing up in relative poverty here; in some constituencies identified by the NI Anti-Poverty Network¹⁸, the rate is reported to be over one in four. In May 2024, the well-respected charity Trussell Trust reported that Northern Ireland showed the biggest increase in the number of people accessing Trussell Trust sponsored food banks of all UK regions, more than doubling over the last five years¹⁹. A contributing factor is low income: in October 2024 the Nevin Economic Research Institute reported that while 14.4% of NI workers were paid below the real living wage in 2022, that had risen to 20.5% in 2024²⁰.

As significant as these sources are, there would be clear, tangible benefits to revisiting previous NISRA work towards a more multi-faceted and inter-related understanding of deprivation via systematic data gathering and analysis of multiple and inter-related deprivation measures.

¹³ United Nations, A Human Rights Based Approach to Data, 2018 at <https://www.ohchr.org/sites/default/files/Documents/Issues/HRIndicators/GuidanceNoteonApproachtoData.pdf>

¹⁴ The most recent Multiple Deprivation Measures data is from 2017 – nearly eight years ago. See <https://www.nisra.gov.uk/statistics/deprivation/northern-ireland-multiple-deprivation-measure-2017-nimdm2017>

¹⁵ For instance, a household was marked as deprived in housing if it reported that it (1) did not have central heating, or (2) was overcrowded.

¹⁶ NI Department of Health and NISRA, Health Inequalities, 2024 at <https://www.health-ni.gov.uk/sites/default/files/publications/health/hscims-report-2024.pdf> pp. 5, 16

¹⁷ NI Audit Office, Child Poverty in Northern Ireland, 2024 at <https://www.niauditoffice.gov.uk/files/niauditoffice/documents/2024-03/NI%20Audit%20Office%20Report%20-%20Child%20Poverty%20in%20Northern%20Ireland.pdf>, p. 10

¹⁸ NI Anti-Poverty Network, 2024 at <https://niapn.org/child-poverty-on-the-rise/>

¹⁹ <https://www.irishnews.com/news/northern-ireland/record-numbers-using-food-banks-in-northern-ireland-says-charity-GPVBFF6PE5EAZA7IZGA46QV7OA/>

²⁰ Nevin Economic Research Institute, Low-Paid Workers: The Need for Continued Support and the Challenge of Making Work Pay, 2024 at <https://www.nerinstitute.net/sites/default/files/research/2024/Research%20InBrief%20no%2090%20Real%20Living%20Wage%20Northern%20Ireland%202024.pdf> p. 3

Questions the Committee may wish to ask:

Why are no detailed multiple deprivation statistics available for Northern Ireland post 2017? What steps are envisioned to gather detailed information on deprivation and to use it to inform policy, programming and spending under guidance such as that in A Human Rights Based Approach to Data?

The UK appears to have backslid in terms of adequate standard of living in recent years, given evidence regarding reliance on food banks, real living wage data, homelessness data and more. What is the government doing to regain the ground lost, particularly in light of its obligations around progressive realisation of ICESCR rights?

2. Human Rights Realisation in the UK

PPR works at the grassroots with marginalised communities, including those who are homeless, those experiencing emotional distress and those who are in the teeth of the UK's hostile environment towards asylum seekers and refugees. In some cases, the same family will be facing all three of these challenges.

While the UK Government has now changed, the last 5 years have seen some of the most regressive and harmful changes in legislation, policy and practice towards asylum seekers and refugees, damaging irreparably the lives of individuals and families and the UK's reputation as a leading voice and threatening rights-based internationalism. PPR is aware of at least one individual we were working with who was so broken by the UK Home Office's approach to his case that he returned home voluntarily, where he was murdered. We draw the Committee's attention to the impact of the UK's asylum system on the economic, social and cultural rights of people seeking international protection throughout this report, but also note here the primary pieces of asylum legislation which drive much of the unfairness.

The Committee will be well aware of the provisions of the 2022 Nationality and Borders Act, which established a two-tier asylum system in the UK. Subsequently, provisions of the 2023 Illegal Migration Act sought to deny new arrivals access to international protection altogether, criminalising anyone arriving by any means other than designated (but largely non-existent) 'safe and regular routes'.

The previous UK government's agreement with Rwanda to send asylum seekers there for processing was challenged in the courts, and in November 2023 the UK Supreme Court ruled the policy unlawful.

In May 2024, in response to a challenge²¹ brought by the NI Human Rights Commission and an individual, the High Court in Belfast ruled that some provisions of the UK's Illegal Migration Act 2023 breached the post-Brexit Windsor Framework by diminishing the human rights

²¹ NI Human Rights Commission, Illegal Migration Act Challenge Factsheet – updated 20 May 2024 at <https://nihrc.org/assets/uploads/publications/Illegal-Migration-Act-Challenge-Fact-Sheet-updated-May-2024.pdf#:~:text=On%2013%20May%202024%2C%20the%20High%20Court,incompatible%20with%20a%20number%20of%20convention%20rights.>

provisions available in the UK and EU at the time of leaving the EU while others were incompatible with EU law. It ordered that they be 'disapplied' in NI²².

In July 2024 a newly-elected Labour government instituted a new statutory instrument, the Illegal Migration Act (2023) Amendment Regulations 2024²³, which put implementation of the IMA on hold indefinitely.

As the Committee will have noted in the State Party's August 2024 response to the list of issues report, it also unequivocally committed to remaining a member of the European Convention on Human Rights. There is now an opportunity for the UK Government to increase protection for rights within both legislation and policy, encompassing improvements to the asylum system itself, in addition to the avowed focus on addressing people trafficking networks. There are also opportunities to incorporate ICESCR into domestic law and increase protections for some of the most common types of rights violations faced by people in the UK.

In August 2024 the Committee on the Elimination of Racial Discrimination expressed concern about "the lack of significant progress to adopt a Bill of Rights in Northern Ireland, despite the terms of the Belfast (Good Friday) Agreement of 1998 (arts. 2, 5 and 6)"²⁴. Relevant to this experience of improving rights protections at devolved level is the recent Scottish Human Rights Bill, now indefinitely postponed by the Scottish Government.

Questions the Committee may wish to ask:

When will the UK repeal the Illegal Migration Act, and the previous Nationality and Borders Act, altogether and bring UK law back into line with international refugee law?

When will the UK Government incorporate ICESCR into domestic legislation and enable greater accountability and focus on economic, social and cultural rights in law, policy and practice?

Does the UK Government commit to supporting the Scottish Government in its efforts to incorporate international protections for economic, social and cultural rights into Scots law while respecting the limits of devolved powers under the Scotland Act 1998?

²² Judicial Communications Office, Court Rules Provisions of the Illegal Migration Act Are Incompatible with Article 2(1) of the Windsor Framework and Should Be Disapplied, May 2024 at https://www.judiciaryni.uk/files/judiciaryni/2024-05/Summary%20of%20judgment%20-%20In%20re%20NIHRC%20and%20JR%20295%20%28Illegal%20Migration%20Act%202023%29%20-%20130524_0.pdf

²³ The Illegal Migration Act 2023 (Amendment) Regulations 2024 at <https://www.legislation.gov.uk/uksi/2024/815/made>

²⁴ CERD/C/GBR/CO/24-26, para. 11.

3. Non-discrimination (art. 2 (2))

3.1 The impact of hostile policies on ESC rights

As this Committee will be aware, the UK has seen decades of deliberately hostile policies towards people seeking international protection and other newcomers²⁵. These have been constructed and enacted by a succession of both Labour and Tory governments; Theresa May's 'hostile environment'²⁶ is perhaps the best known of these programmes, though it is not the last²⁷. The cumulative impact of these policies have forced people seeking safety in the UK to live in impoverished, dependent and isolated circumstances.

Immigration falls squarely under the remit of the Home Office in Westminster; but the uptick in immigration here over recent years -- as of end September 2024 there were 2,632 people in NI in receipt of some form of asylum support from the Home Office²⁸-- has meant that NI departments and agencies are increasingly confronted with the impact of Westminster's 'deterrent' policies on vulnerable households in need of their services locally. The ways in which Home Office policies interact with NI's existing economic, societal, administrative and structural constraints inform many aspects of this submission.

Questions the Committee may wish to ask:

What are duty bearers in both Westminster and Stormont doing to reverse the harm caused by previous governments' 'hostile environment' policies?

What are duty bearers in both Westminster and Stormont doing to support and strengthen the NI structures (health, education, housing) that have struggled to adequately meet the challenges posed by a growing population of people seeking safety?

²⁵ To give just a partial overview: the 1996 and 1999 **Immigration and Asylum Acts** restricted access to benefits and support amongst people subject to immigration control and imposed a 'No Recourse to Public Funds' status on some, including asylum seekers whose initial application was refused. Such measures continued. In 2002, the **Nationality, Immigration and Asylum Act** extended the previous six-month wait for permission to work imposed on people in the asylum system to one year and restricted their access to social care. The 2006 **Immigration, Asylum and Nationality Act** provided for prosecution of employers who flouted the work ban. In 2010 the Home Office imposed further restrictions on the right to work, limiting asylum seekers' employment options after 12 months in the system solely to positions on its bespoke, highly specialised 'Shortage Occupation List'. Self-employment, and employment in any position not among the handful of professions listed, was not permitted.

²⁶ In 2012 then-Prime Minister Theresa May publicly announced the government's intent to create a 'hostile environment' in the UK-- ostensibly for 'illegal immigrants', but in fact also for people in the asylum system and other immigrants. Via **Immigration Acts** in 2014 and 2016 the government stiffened penalties for and imposed new requirements for internal checks by private employers and landlords potentially in contact with immigrants.

²⁷ Tory governments of more recent years continued the trend. In 2020, changes to the **Immigration Rules** mandated deportation of rough sleepers, even those with leave to remain. The 2022 **Nationality and Borders Act** established different pathways and entitlements to asylum seekers arriving 'directly' to the UK (ie by non-stop flight) as opposed to those having crossed other countries' borders during their journeys. The UK government signed a Memorandum of Understanding with the government of Rwanda for off-shore processing of asylum claims -- and off-shore fulfilment of protection duties in the event of successful claims -- which ultimately was not implemented following legal challenges.

²⁸ <https://www.gov.uk/government/statistical-data-sets/immigration-system-statistics-data-tables#asylum-and-resettlement>, (table ASY_D09)

3.2 Rising incidence of racist hate crime and its impact on ESC rights

In recent years PPR have monitored and recorded reports of hate incidents in NI, whether sectarian or race- or ethnicity-oriented²⁹. However, press accounts represent only some of what is reported to the police, and what is reported to the police represents only a fraction of what happens day to day. (This is particularly true in NI in light of information that came to light in February 2023 of the Police Service of Northern Ireland reporting dozens of foreign-born victims of crime – people who had approached them for help-- to Home Office Immigration Enforcement authorities³⁰. These included victims of human trafficking, modern slavery and domestic violence.)

Aware of this community's understandable distrust and fear of the authorities, in summer and autumn 2023 PPR supported several individuals whose South Belfast businesses had been targeted in racially-motivated hate crimes, through intimidation, threats and arson attacks³¹.

PPR and affected business owners convened a public meeting on 31st August 2023, to which all political parties, relevant public bodies, community organisations and Departmental representatives were invited. No one has been brought to justice, and victims' applications to the Criminal Damage Compensation Scheme were denied³². (In response, in July 2024 the Victims of Crime Commissioner publicly stated that the scheme was not fit for purpose³³.)

However, racially-motivated incidents continued; some politicians deflected criticism of such behaviour by referring to local people's discomfort with change or describing it as a reaction to perceived loss of public services³⁴. In the year leading up to March 2024, the Police Service of Northern Ireland recorded around 1,350 racially motivated incidents and 840 such crimes – the highest levels since data began being collected in 2004/5³⁵. It was clear from the data that the incidence of these had increased in Belfast over the year preceding the summer 2023 attacks. Sanction rates in the city – at 11% -- were substantially lower than the average in England, Scotland and Wales (16%).

PPR's Freedom of Information requests revealed the inadequacy of the data-sharing on the frequency and location of hate incidents, necessary in order to map threats and to bring perpetrators to justice. Longstanding arrangements between, for instance, housing

²⁹ See <https://www.nlb.ie/investigations/policy-watch/07-2024-racism-in-belfast-a-timeline-and-media-resource>

³⁰ <https://thedetail.tv/articles/migrants-risk-deportation-after-reporting-crimes-to-psni>

³¹ See <https://www.nlb.ie/blog/2024-07-racism-in-belfast-local-shops-and-businesses-only>. At least one perpetrator's face was caught on CCTV footage that was provided to the police.

³² 75% of the claims decided over the last five years of recorded data, which saw 1,000 claims made, were denied.

³³ <https://www.thedetail.tv/articles/victims-of-race-hate-attacks-refused-government-compensation>

³⁴ <https://www.belfastlive.co.uk/news/belfast-news/dup-councillor-says-offensive-signs-28035373>

³⁵ <https://www.psni.police.uk/about-us/our-publications-and-reports/official-statistics/hate-motivation-statistics>

authorities and entities tasked with ‘verifying’ reported threats from paramilitary groups came under heightened scrutiny³⁶.

3 August 2024 saw a night of targeted attacks³⁷. Seven Black-owned businesses on Sandy Row, Donegall Road, and Botanic (all in South Belfast) were attacked by rioters following a Far-Right march in central and South Belfast at which known paramilitaries were also present. The PSNI did little to contain the violence or stop the attacks from taking place, raising further questions about the way such events are policed. Homes, businesses and places of worship continued to be targeted throughout the week.

The official response

The PSNI itself called the violence ‘organised’³⁸, and some civil society groups linked it with elements of loyalist paramilitarism³⁹. The Committee for the Elimination of Racial Discrimination made the same connection in its 2024 Concluding Observations:

while noting the efforts by the State party to tackle paramilitarism in Northern Ireland, the Committee is concerned about reports of paramilitary groups and affiliated individuals perpetrating acts of racist violence and intimidation to deter persons belonging to ethnic minorities and migrants from taking up housing or establish business in certain areas. It is also concerned about information indicating that victims do not always report these acts for fear of reprisals and that the response by the authorities and the police has been ineffective⁴⁰.

It recommended

that the State party, particularly the government of Northern Ireland, adopt robust measures to prevent and combat paramilitary racist violence and intimidation against ethnic minorities and migrants in Northern Ireland, systematically collect information on these acts of intimidation and ensure that cases of paramilitary racist violence and intimidation are promptly and effectively investigated, prosecuted and punished with appropriate sanctions, and that victims have access to effective protection and redress.⁴¹

Individuals and families around Belfast and around the north were left fearful and isolated. In some cases, official responses in the aftermath of the violence reportedly compounded the trauma that people had just experienced. (In one example, Black and Minority Ethnic communities alerted NI Assembly members that victims of race hate crime had been referred to restorative justice organisations known to have links to paramilitary and proscribed

³⁶ See for instance <https://www.nlb.ie/blog/2024-08-racism-in-belfast-what-do-we-know-and-how-are-we-using-it-to-combat-racist-violence>

³⁷ See *inter alia* <https://www.bbc.co.uk/news/articles/cgkyyjg3pxpo>

³⁸ <https://www.bbc.co.uk/news/uk-northern-ireland-67126304>

³⁹ <https://www.bbc.co.uk/news/articles/c8erk5zz894o>

⁴⁰ CERD/C/GBR/CO/24-26, para. 21.

⁴¹ *Ibid.*, para. 22.

organisations⁴². The continuing use of such programmes by public authorities – and the practice of referring survivors to them- is being called into question in this context.)

More broadly, earlier in the summer of 2024, the NI Housing Executive had opened a consultation on a ‘Community Safety Strategy’. It was focused primarily on anti-social behaviour. This, in the light of the violence to come, inadvertently shone a spotlight on too many duty bearers’ tendency to minimise the recurring threats and incidents facing ethnic and religious minorities, and underlined the urgent need for a more serious approach to tackling racism and hate crime-- including by paramilitary groups and those under their protection⁴³.

The Department of Justice, the PSNI and the Housing Executive participate in a Hate Incident Practical Action Scheme to support people whose homes have been targeted by hate crime, but Freedom of Information (FOI) requests reveal that its implementation is very limited (8 applications received and acted on in 2022/23 and 2023/24; 6 as of mid-way through financial year 2024/25). A new (2022) Hate Crime Advocacy Service to encourage reporting and follow-up of incidents saw, in 2022/23, 7% of reported cases forwarded to the Public Prosecution Service for consideration; in 2023/24 this was 3.4%, according to FOI response. A multilingual HelpInHand app was introduced in 2024 with information about how to report incidents and next steps; its impact has yet to be assessed.

For their part, elected members of the Northern Ireland Assembly took part in an open debate on paramilitarism, its role in communities and the practice of official engagement with its representatives on 15 October 2024. Reflecting growing public concern⁴⁴, the debate questioned whether engagement with individuals linked to paramilitary groups served to legitimise the groups, and the extent to which that is – or isn’t – in the public interest:

talking to representatives of armed groups to bring about peace as people were dying is not the same as talking to representatives of armed groups engaged in widespread criminality 30 years on who have no apparent intention of getting off the stage and getting off the backs of communities⁴⁵.

Another MLA commented, “in too many places, we now have a situation where people are community workers by day and thugs by night”. A third expressed an opposing view, that a

⁴² <https://www.irishnews.com/news/northern-ireland/psni-watched-on-and-let-rioters-burn-businesses-mlas-told-NTYG4A2E5ZGO5HQ3TZJR7DST4Y/>

⁴³ See PPR’s consultation response at <https://www.library.nlb.ie/book/87>.

⁴⁴ Public concern about the role and influence of paramilitaries was heightened by information that two sitting Ministers for the DUP party – the Communities and Education Ministers – had recently met with members of the Loyalist Communities Council. This group is reported to include representatives of loyalist paramilitary organisations; it was recently described by the BBC as “a legal entity which represents illegal organisations” (see <https://www.bbc.co.uk/news/articles/cq5enw0zjp9o>). These concerns were further compounded by the fact that law-abiding civil society groups who wished to engage with DUP Ministers on matters of policy were denied the opportunity to meet.

⁴⁵ The record is at <https://data.niassembly.gov.uk/HansardXml/plenary-15-10-2024.pdf>.

“credible path to ending paramilitarism once and for all” depends on engagement with “those who wish to move out from under the shadow of paramilitarism for good”⁴⁶.

They agreed a joint resolution⁴⁷. Another resolution, of 12 November, called for

a comprehensive review of the racist attacks of July and August 2024, to include what happened, why it happened and who was involved, and to bring forward proposals on how to prevent it happening again⁴⁸.

An independent review of NI’s Racial Equality Strategy 2015-2025 – submitted in March 2024 but not made public by the NI Executive until the eve of the Christmas holidays, 23 December 2024 – found that

the aims of the strategy have been undermined by the lack of: an action plan; involvement of people with lived experience; and a process for ethnic monitoring; and could have been enhanced by more attention to governance⁴⁹.

The review proposed concrete actions in each of these four areas, including amongst others development of an action plan and budget, a regular review process for the strategy and a programme for engagement with marginalised groups.

Questions the Committee may wish to ask:

In the face of rising racist violence and intimidation, what is government doing to ensure that the ‘inherent dignity’ of minority groups is respected and they are guaranteed ‘freedom from fear’ and the same opportunities to enjoy rights to housing, work and education as anyone else in Northern Ireland? (preamble, ICESCR)?

How are authorities going to build minority groups’ confidence in the PSNI going forward, given the history of involuntary data sharing by the police force with immigration authorities?

What concrete, time bound and targeted steps do NI authorities intend to take to record and publish accurate data on the numbers of people intimidated from their homes due to paramilitary activity?

⁴⁶ *Ibid.*

⁴⁷ *Ibid.* “That this Assembly recognises that the ongoing presence of paramilitary organisations is harming community cohesion, economic development and the overall stability of Northern Ireland; notes with concern the persistent incidents of paramilitary activity, including intimidation, extortion and violence, which continue to undermine the rule of law and the safety of our citizens; further notes with regret the continued attempts by groups linked to paramilitary organisations to influence policy decisions in the absence of a democratic mandate or transparent governance structures; and calls on the First Minister and deputy First Minister to introduce a comprehensive review of the tackling paramilitarism, criminality and organised crime programme to ensure that actions within the final Programme for Government genuinely tackle the scourge of paramilitarism in our society.”

⁴⁸ See record at <http://data.niassembly.gov.uk/HansardXml/plenary-12-11-2024.pdf>

⁴⁹ Independent Review of the progress on the implementation of the Racial Equality Strategy 2015-25: final report at <https://www.executiveoffice-ni.gov.uk/sites/default/files/2024-12/independent-review-of-the-progress-on-the-implementation-of-the-racial.PDF>, p. 2

What concrete, time bound and targeted steps will NI authorities to take to address housing and other forms of intimidation, including how it will be included in programmes to tackle paramilitary activity?

How do authorities plan to deter and prevent racist hate and protect religious and ethnic minority people from it? How will they ensure accountability for hate crimes?

What steps will the Department of Justice take to reform the Criminal Damage Compensation Scheme, which sets a very high bar for victims?

How will authorities reduce the power of paramilitaries within communities where they currently are dominant to support the enjoyment of economic, social and cultural rights by everyone?

4. Right to work (art. 6)

4.1 People seeking international protection

People awaiting an asylum decision

People in the asylum system are barred from working by UK law. After 12 months waiting (as long as the delay is not of their making), official guidance is that they may apply to work – but only if they meet a set of very strict criteria. As the then UK Minister for Legal Migration and Delivery wrote in February 2024, in response to a question from an MP,

asylum seekers who have had their claim outstanding for 12 months or more, through no fault of their own, are allowed to work. Those permitted to work are restricted to jobs on the Shortage Occupation List. *This is based on expert advice from the independent Migration Advisory Committee*⁵⁰. (emphasis added)

This was incorrect. In fact, as far back as its 2021 annual report the Migration Advisory Committee not only questioned Home Office policy on the work ban and recommended a review, but also put forward the suggestion of allowing asylum seekers to work, in any occupation, after six months⁵¹.

The MAC repeated this view as recently as October 2023⁵². The Home Office replaced its ‘shortage occupation list’ with a ‘skilled worker visa’ immigration salary list in April 2024⁵³;

⁵⁰ <https://questions-statements.parliament.uk/written-questions/detail/2024-02-16/14281>

⁵¹ MAC Annual Report, Dec 2021 at

https://assets.publishing.service.gov.uk/media/61b8d25f8fa8f5037e8ccd3b/2021_Annual_Report_combined_FI_NAL_v3.pdf, p. 32 (emphasis added): “the MAC would recommend the Government review their policy on allowing asylum seekers to work. One option might be to allow applicants to work if an initial decision has not been made within six months. We also question the value of the current restriction that allows work after 12 months only on SOL [Shortage Occupation List] occupations – *this was never the purpose of the SOL, and the original reasoning behind this restriction does not seem to be particularly coherent.*”

⁵² MAC Review of Shortage Occupation List, 2023 at <https://www.gov.uk/government/publications/review-of-the-shortage-occupation-list-2023> (pp. 16, 33-34)

⁵³ <https://www.gov.uk/government/publications/skilled-worker-visa-immigration-salary-list>

asylum seekers are still not permitted to work in any position after 12 months, not to mention after six as recommended by the MAC. As recently as October 2024, the Labour government continued to misrepresent the MAC advice on asylum seekers working rather than comply with it⁵⁴. Research into asylum seekers' experience of trying to obtain and exercise permission to work in the UK, published in December 2024, found that

the path for asylum seekers to access work is narrow and obstructed. While the government provides the concession of a 'permission to work', the process to acquire this and the restrictions around it can lock asylum seekers out of the UK labour market.⁵⁵

Newly recognised refugees

New refugees now face unprecedented barriers to finding work. Part of this is due to their being placed by the Northern Ireland Housing Executive in hotels in far flung areas, away from any community network or contacts they have built up. They are told by the Housing Executive that they will be moved somewhere permanent as soon as possible, but they have no idea when this will be, or where. As such they are in no position to apply for work, even if an employer was willing to hire them in such uncertain circumstances.

Another barrier is transport. Northern Ireland is a car-dependent place; for a time people did have public transport passes provided by the Department for Infrastructure on a pilot scheme, but this has since ended. Many people are being placed in hotels without access to buses or train lines, and without the resources to pay taxis to even get to one-off interviews, much less regular work.

Finally, parents face an additional obstacle in childcare. Families are moved out of area, away from their children's schools. They are told that the new housing is temporary, and that the Education Authority will not help them to change their children's schools, even if they are unable to attend due to distance and lack of transport. This means that children are effectively out of school altogether, and with no childcare during the day parents find it difficult to look for work.

4.2 People with disabilities

Disability Action's Election Manifesto 2023 noted that one in four people in Northern Ireland are disabled, yet disabled people "continue to experience barriers in accessing housing, transport, employment, education, leisure, health and public services"⁵⁶. Its 'Manifesto for Change' cited 2022 research findings that "9 out of 10 disabled people continue to find it difficult to find and keep a job"⁵⁷.

⁵⁴ <https://questions-statements.parliament.uk/written-questions/detail/2024-10-21/10285>

⁵⁵ Focus on Labour Exploitation, December 2024 at [1-kept-waiting-and-waiting-The-realities-of-asylum-seekers-restricted-right-to-work-in-the-UK-Final-2.pdf](https://www.focusonlabour.org.uk/wp-content/uploads/2024/12/1-kept-waiting-and-waiting-The-realities-of-asylum-seekers-restricted-right-to-work-in-the-UK-Final-2.pdf), p. 28.

⁵⁶ Disability Action NI, Election Manifesto 2023 at <https://www.disabilityaction.org/news/disabled-peoples-peoples-election-manifesto-2023>

⁵⁷ Disability Action NI, Manifesto for Change, 2023 at <https://www.disabilityaction.org/Handlers/Download.ashx?IDMF=f0f654b8-f44a-4a75-b9de-aac5c09e3797>, p. 3

June 2023 research by the Trussell Trust demonstrated that people living with disabilities face disproportionately high levels of food insecurity; it looked at the role played by barriers to employment⁵⁸.

In July 2023 PPR's submission to the UN Committee on the Rights of Persons with Disabilities' follow-up inquiry concerning the United Kingdom of Great Britain and Northern Ireland, carried out under article 6 of the Optional Protocol to the CRPD drew attention to people's experiences of under- or unemployment, among other issues⁵⁹.

Questions the Committee may wish to ask:

Will the Home Office finally implement Migration Advisory Committee advice and allow people in the asylum system to work in any position after six months?

What will be done to help newly recognised refugees overcome the barriers in temporary accommodation, transport and children's access to education that impede their ability to find and stay in work?

Will the authorities gather and act on data about the specific barriers to work faced by people living with disabilities?

Free bus travel has been recently reinstated for asylum seekers in Scotland. With around 3,000 people seeking asylum in Northern Ireland, data provided by the Department for Infrastructure suggests that this is unlikely to cost more than around £375,000 per year in a budget envelope of almost £45m. When will the Department for Infrastructure follow Scotland's example? Could the Department for Infrastructure provide the Committee with a figure for the percentage of the transport budget which free bus and train travel for asylum seekers would represent?

5. Right to social security (art. 9)

As of May 2024, over 76,000 people in NI were in receipt of Carer's Allowance; over 96,000, Employment and Support Allowance; over 161,000, Universal Credit; over 210,000, Personal Independence Payment; and over 72,000, Disability Living Allowance⁶⁰.

⁵⁸ Trussell Trust, Hunger in Northern Ireland, June 2023, at <https://www.trusselltrust.org/wp-content/uploads/sites/2/2023/06/2023-Hunger-in-Northern-Ireland-report.pdf>. "Despite reductions over the last decade in the disability employment gap, disabled people referred to food banks in the Trussell Trust network in Northern Ireland are still far less likely to be in work than non-disabled people, with one in eight (12%) in work compared to over one in four (28%) of non-disabled people. As is the case among parents and carers, disabled people often work part-time in order to help manage their health condition, but this too tends to restrict them to lower-paid jobs such as care work, sales and customer service and other types of leisure and service work. Research shows that they are over-represented in these kinds of roles and under-represented in more senior and managerial roles." (p 49)

⁵⁹ <https://www.library.nlb.ie/book/34>

⁶⁰ <https://www.communities-ni.gov.uk/system/files/publications/communities/benefits-statistics-summary-may-2024.pdf>

NI duty bearers-- unlike those in Scotland⁶¹-- outsource the assessment of people's eligibility for benefits to private companies rather than assessing in-house, despite widespread criticism. The private company Capita began carrying out Personal Independence Payment (disability benefit) eligibility assessments on behalf of the UK Government and the NI Department of Communities (DFC) in 2016, and was roundly criticised for its practice, which included frequent decisions – later overturned on appeal-- to refuse to award the benefit⁶².

A June 2021 'own initiative' investigation by the NI Public Services Ombudsman (NIPSO) into Capita and the DFC's management and delivery of benefit assessments had found repeated failings, amounting to 'systemic maladministration', in the management of further evidence submitted by health professionals to substantiate PIP applicants' claims. In May 2023, a follow-up NIPSO report found that of the 33 recommendations it made to the DFC in this regard in 2021, five had not been met, and a further 18 had been only partially met.

Notwithstanding these findings-- and regardless of earlier statements expressing interest in bringing such sensitive decision-making in-house⁶³ – in May 2023 the DFC not only re-appointed Capita to carry out PIP assessments but actually extended its remit to cover Employment and Support Allowance (ESA), Universal Credit (UC) and a number of specialist benefits including Child Disability Living Allowance (DLA) and Veterans UK assessments as well⁶⁴. The contract will run to at least 2029⁶⁵.

As mentioned in previous submissions, since 2016 NI authorities have passed supplementary 'top-up' measures in response to UK-wide reductions on benefit payments (such as bedroom tax, the two-child limit and benefit caps), to 'mitigate' their impact⁶⁶. In December 2024 these important mitigations, set to run out at end March 2025, were extended to end March 2028⁶⁷.

5.1 People seeking international protection

People in the asylum system are not eligible for state support like benefits or social housing⁶⁸. If their asylum claim is rejected, they lose even the minimal asylum support and are unable to access any public funding. This is known as 'No Recourse to Public Funds' status and can lead to total destitution⁶⁹. Denied access to state-sponsored emergency accommodation, they are at risk of becoming street homeless and worse still, at risk of exploitation, trafficking and for women, sexual and gender-based violence without recourse to justice.

⁶¹ <https://inews.co.uk/news/politics/scotland-bans-private-firms-benefit-assessments-61963>

⁶² https://www.nlb.ie/blog/2021-01-backlog_of_social_security_appeals_needs_to_be_urgently_resolved

⁶³ https://www.nlb.ie/blog/2021-05-minister_for_communities_must_say_no_to_capita_and_yes_to_human_rights

⁶⁴ <https://www.derrynow.com/news/home/1244620/communities-department-capita-assessment-contract-decision-slammed.html>

⁶⁵ <https://www.capita.com/news/capita-selected-preferred-bidder-deliver-new-functional-assessment-service>

⁶⁶ <https://www.nidirect.gov.uk/articles/support-if-youre-affected-welfare-changes>

⁶⁷ <https://www.communities-ni.gov.uk/news/welfare-mitigation-payments-be-extended-another-three-years>

⁶⁸ <https://www.gov.uk/government/publications/public-funds--2/public-funds>

⁶⁹ <https://www.nrpfnetwork.org.uk/information-and-resources/rights-and-entitlements/immigration-status-and-entitlements/who-has-no-recourse-to-public-funds#guide-content>

When people receive a positive decision on their claim for asylum, they become eligible to work and for the UK's Universal Credit benefit system. However, the five-week wait for the first Universal Credit payment – a feature built into the UC system and affecting all applicants – causes a continuing period of enforced destitution, a gap between when one form of support ends and another begins. What this means practically is that people – including children – suffer hardship and distress. This is compounded by the fact that new refugees placed by the Housing Executive in emergency accommodation in hotels – unlike in asylum accommodation-- do not have either access to kitchens or set meals provided. Families have told PPR of living on donations of bread and butter with their children while waiting for their Universal Credit payment to come through.

5.2 People with disabilities

People with disabilities face blockages in accessing the social security system, with serious knock-on effects for their living standards. In June 2023, for instance, the Trussell Trust's *Hunger in Northern Ireland* revealed that nearly two thirds of people referred to food banks in the Trussell Trust network are disabled. The report added

the most significant cause of the financial insecurity driving the need for food banks is the *design and delivery of the social security system*⁷⁰. [emphasis added]

It said that while 30% of people in NI "meet the Equality Act 2010 definition of disability", that percentage is much higher-- 55%-- amongst people experiencing food insecurity. More than six in ten people referred to Trussell Trust foodbanks in NI reported that at least one member of their household is a disabled person, but highlighted further problems with the support system:

In some cases, it may be that people may not quite meet the eligibility criteria, but there is substantial evidence to suggest that others should be receiving them [disability benefits] but are not doing so⁷¹.

In July 2023 PPR submitted concerns in this area to the UN Committee on the Rights of Persons with Disabilities inquiry into the impact of the changes to social security ('welfare reform') in the UK⁷².

Questions the Committee may wish to ask:

What steps will the government take to ensure data collection and analysis of the range of factors contributing to poverty and food insecurity in households where someone is living with a disability, to better inform programming?

In particular, what measures will be taken to ensure that everyone in NI eligible for disability benefit can have access to it?

⁷⁰ *Op. cit.*, Trussell Trust Hunger in Northern Ireland, p. 14.

⁷¹ *Ibid.*, p. 45.

⁷²See https://www.nlb.ie/content/posts/assets/PPR_Submission_to_CRPD_Committee_310723.pdf

What concrete, time-bound and targeted steps will the Department for Communities and the Department for Work and Pensions take to reduce the five week waiting period for Universal Credit?

What is the UK Government's view of the equality impact of the two child ban and the benefit cap? Does it find its No Recourse to Public Funds policies compatible with its obligations both to the right to an adequate standard of living and the protection of women asylum seekers from exploitation and abuse?

Can the UK Government provide any evidence that the two child ban and the benefit cap have led to increased uptake in employment among families who are subject to these policies? Can it provide any evidence that 'No Recourse to Public Funds' has any deterrent impact on would-be asylum claims?

6. Protection of the family and children (art. 10)

Our work with families seeking international protection and newly-recognised refugees indicates that they would greatly benefit from provision of a social care assessment upon their arrival in NI. Many families we have worked with include disabled adults or adults with long term health conditions that need specific support to manage them, as well as physically disabled children and those of require additional support because of a learning disability, autism or other neurodiverse experiences. Despite this, we have on multiple occasions observed that Mears, the UK Home Office accommodation provider has failed to assess and provide for the needs of disabled people; examples are families with non-mobile children housed on upper floors, families with multiple wheelchair users confined to one room, inaccessible bathing and toileting facilities and individuals with heart problems housed on upper floors without lift access. To compound this, waiting lists for occupational therapy assessments are long, and families can often be left waiting several months before their needs are appropriately identified.

Families in and those newly emerging from the asylum system are subjected to very frequent moves. For too many families with particular needs – family members living with disabilities or chronic health problems, for instance – this means that they have to fight the same battles for suitable and accessible accommodation over and over again.

A mechanism for regular social care assessment would ensure that accommodation and other providers are fully informed of a family's situation and can take that into account in decision-making about their accommodation, without forcing them to begin the process from scratch each and every time they are moved. It would also ensure that people living with disabilities or health conditions would not risk falling through the cracks in the system, but instead have their needs fully taken into account by all duty bearers.

Questions the Committee may wish to ask:

What steps will the Department of Health and Social Care take to ensure that the accessibility needs and rights to health of disabled people seeking international protection are met in a timely fashion?

7. Right to an adequate standard of living (art. 11)

7.1 Poverty

Although poverty in NI did not figure in the UK government's August 2024 response to the Committee's List of Issues report, it is a hugely significant and multifaceted issue here.

Research findings published in February 2023 by Joseph Rowntree Foundation and Trussell Trust shone a light on the worrying gap⁷³-- on average £140 short in meeting basic living costs each month-- in housing affordability in the UK, reflecting amongst other factors a shortfall between Universal Credit payments to families in need and their spiralling living costs⁷⁴. Shortly thereafter Trussell Trust NI reportedly delivered the highest ever number of food parcels in Northern Ireland (over 81,000) over the preceding year⁷⁵. At the same time, the NI Department of Education was reported as having cancelled its Covid-era school holiday food grant for children from low-income families⁷⁶.

In May 2024 Joseph Rowntree Foundation cited recent NI Poverty and Income Inequality findings⁷⁷ of rising relative poverty (to 18%) and absolute poverty (to 14%) as a major factor in a new decision⁷⁸ to establish a dedicated NI team.

The policy framework

Section 28E of the NI Act 1998 required the NI Executive to develop "a strategy setting out how it proposes to tackle poverty, social exclusion and patterns of deprivation based on objective need"⁷⁹. In 2020 the Department for Communities set up an Anti-Poverty Strategy Expert Advisory Panel⁸⁰. Recommendations were published in 2021⁸¹ but to date no strategy

⁷³ <https://www.jrf.org.uk/report/guarantee-our-essentials>

⁷⁴ <https://www.theguardian.com/society/2023/feb/26/uk-benefits-fall-short-of-minimum-living-cost-by-140-a-month-charities-say>

⁷⁵ <https://www.bbc.co.uk/news/uk-northern-ireland-65386628> (2023). Further coverage of Trussell Trust's most recent emergency food distribution report for NI (November 2024) is *inter alia* at <https://www.newsletter.co.uk/health/northern-ireland-executive-urged-to-act-on-hunger-as-35000-emergency-food-parcels-distributed-4874421>

⁷⁶ <https://www.bbc.co.uk/news/uk-northern-ireland-65121458>

⁷⁷ See https://datavis.nisra.gov.uk/communities/PII_report_2223.html

⁷⁸ <https://www.jrf.org.uk/child-poverty/jrf-to-establish-new-team-in-northern-ireland>

⁷⁹ <https://www.legislation.gov.uk/ukpga/1998/47/section/28E>

⁸⁰ <https://www.communities-ni.gov.uk/publications/report-anti-poverty-strategy-expert-advisory-panel>

⁸¹ See <https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-anti-poverty-strategy-executive-summary.pdf>

is in place. Civil society groups met with the NI Assembly’s Communities Committee in April 2024 to push for progress towards this now 26-year-old, as yet unfulfilled commitment⁸².

Meanwhile, a 2016-2022 Child Poverty Strategy, from the NI Executive, has come under real criticism and has not been renewed. An October 2024 report by the Public Accounts Committee into child poverty in NI said the Committee were “hugely disappointed that families and children were not at the heart of the Child Poverty Strategy and at times the Department [for Communities – responsible for monitoring and reporting] appeared to be too far removed from children and families experiencing poverty”⁸³. It found overall that

delivery of the Child Poverty Strategy has been characterised by failure – failure to turn the curve and reduce child poverty, failure to monitor outcomes effectively, failure of collective working and accountability, failure to engage with children and the community and voluntary sectors, and now a failure to produce a new anti-poverty strategy⁸⁴.

Renewed calls for an overarching Anti-Poverty Strategy followed publication of the Public Accounts Committee report⁸⁵.

7.2 Poverty amongst specific groups

Asylum seekers and refugees

While in the asylum system, new arrivals to NI are frequently housed in hotels under the aegis of the Home Office’s Asylum Accommodation Support Contract held by the private company Mears Group. Our January 2023 submission described some of our work with asylum seekers placed in restrictive and isolating ‘contingency accommodation’ in hotels, and the ways in which we helped them raise their concerns with duty bearers (a follow up meeting on 22 February 2023 highlighted some progress in some areas)⁸⁶.

The use of hotels to house asylum seekers continues, as does debate around it⁸⁷; and so does our work with this group. Today those in ‘contingency accommodation’ in hotels with set meals currently receive £8.86 per person per week to live on; toiletries, fresh fruit, baby milk,

⁸² <https://niapn.org/the-equality-coalition-keeps-focus-on-anti-poverty-strategy/>

⁸³ Public Accounts Committee, Report on Child Poverty in Northern Ireland, 2024 at <https://www.niassembly.gov.uk/globalassets/documents/committees/2022-2027/pac/reports/2024-2025/child-poverty/pac-report-on-child-poverty-in-northern-ireland.pdf>, para. 3

⁸⁴ *Ibid.*, para. 7.

⁸⁵ See <https://www.northernirelandworld.com/news/politics/communities-minister-urged-to-urgently-bring-forward-anti-poverty-strategy-gildernew-4858075>. The Department for Communities did launch a consultation on a fuel poverty strategy and energy efficiency scheme for low-income households in December 2024 (see <https://www.northernireland.gov.uk/news/minister-launches-consultation-fuel-poverty-strategy>).

⁸⁶ <https://www.nlb.ie/blog/2023-03-human-rights-defenders-kind-economy-activists-take-the-lead-in-making-change>

⁸⁷ See *inter alia* recent press coverage at <https://www.belfasttelegraph.co.uk/news/northern-ireland/number-of-asylum-seekers-in-ni-hotels-falls-but-stays-too-long/a437818994.html> and Hansard record at <https://hansard.parliament.uk/lords/2024-11-25/debates/847F5E16-371B-4308-BC02-29F9E9CF60E4/AsylumSeekersHotelAccommodation>.

nappies and other essential items are meant to be provided by Mears Group but testimonies indicate that this is not always the case.

Then-Prime Minister Rishi Sunak's December 2022 pledge to "abolish the backlog of initial asylum decisions" by end 2023 led to a unprecedented number of positive decisions being issued in a short time, beginning in NI in late summer 2023⁸⁸. The Home Office changed its guidance around 'discontinuing' asylum support and moving newly recognised refugees on from asylum accommodation, speeding the process up-- despite the inability of the Northern Ireland Housing Executive to cope with the new caseload. (The Housing Executive is not alone: recent reporting indicates that across the UK, this expedited decision-making led to a 251% increase in people evicted from asylum accommodation becoming homeless⁸⁹.)

As mentioned above, for those whose claim is denied, the 'No Recourse to Public Funds' designation means being barred from accessing even homeless shelters – leaving destitute people at serious risk of harm or exploitation.

For those whose asylum claim is approved, having their account validated and being granted refugee status is clearly a positive step for individuals and families. However, the 28-day countdown imposed by the Home Office in August 2023 has caused real worry and distress. Like many others in the voluntary sector we welcome the December 2024 decision by the Home Office to extend this period to 56 days on a trial basis until June 2025⁹⁰, but we caution that without changes to process and investment in social housing, newly recognised refugees will still fall off a cliff edge into homelessness and destitution. For parents who had been denied the right to work and support themselves (other than the above-mentioned £8.86 per person / week stipend) and who as a result had no savings or financial cushion of any kind, being told that all asylum support was soon to be cut threatened their wellbeing.

In terms of accommodation, the private rental sector is closed to them due to the work ban and related lack of savings for a deposit. When they are effectively made homeless, responsibility for housing them passes to a Northern Ireland Housing Executive already labouring under a social housing waiting list of over 48,000 households (more than six out of ten of them also legally homeless⁹¹). To try to avoid homelessness and destitution, in November 2023 PPR called for a cold-weather moratorium on evictions from asylum accommodation⁹², which was eventually implemented in December – January 2023.

As it stands, we have witnessed the Housing Executive and Mears literally advising people to turn up at NIHE offices on the day of their eviction from asylum accommodation, with their

⁸⁸ See <https://www.gov.uk/government/speeches/pm-statement-on-illegal-migration-13-december-2022>. According to statistics obtained by PPR through Freedom of Information, the Home Office issued 932 asylum decisions in Northern Ireland between 1 August 2023 and 19 March 2024. Of these, 876 were positive decisions to grant refugee status; 49 were refusals; and the remaining seven were "unknown case types where we are unsure whether it was a positive or negative decision without a further interrogation of our data".

⁸⁹ <https://www.independent.co.uk/news/uk/home-news/refugee-homeless-home-office-map-council-b2667138.html>

⁹⁰ <https://www.refugeecouncil.org.uk/latest/news/refugee-council-welcomes-change-to-the-move-on-period-for-refugees/>

⁹¹ <https://www.nlb.ie/investigations/FOI/2024-03-what-happens-when-the-state-deprioritises-social-housing>

⁹² <https://www.nlb.ie/blog/2023-11-ppr-calls-for-a-cold-weather-moratorium-on-evictions>

families and belongings, and wait for NIHE staff there to arrange something for them. People have done this only to wait the entire day. Due to the gap between social housing demand and supply, and the short notice of this new need, in practice what the Housing Executive appear to be doing is making unprecedented use of hotels as emergency temporary accommodation – a stopgap to prevent people under its responsibility becoming street homeless. It is not clear what – or even whether – procurement practices are in operation to ensure the suitability and adequacy of temporary accommodation, in the context of an almost total housing shortage.

So people are frequently moved from one hotel, under Mears, to another, often distant, hotel, under the Housing Executive. These new Housing Executive hotels are, for starters, often far from children's schools, as the Education Authority has had cause to call out, given their work in finding the school placements for children in the first place. They are frequently far from GPs or consultants who are giving people much-needed care – many of these medical professionals have written to the Housing Executive urgently requesting that their patients be moved back to within reach of their services. Some people living with disabilities have been placed in unsuitable or inaccessible accommodation, without any level of support.

People living with disabilities

NI's Public Health Agency cites unemployment, high disability and illness rates, low wages and lack of flexible or part-time work as one of the four main reasons for higher persistent poverty in NI as compared to other regions of the UK⁹³. June 2023 research from the Trussell Trust found that people living with disabilities face disproportionately high levels of food insecurity⁹⁴, while an August 2023 report from the Carer Poverty Commission NI found that factors like diminished access to paid work; heightened costs of caring for someone with a disability; and insufficient carers' benefit were driving deepening poverty amongst this group⁹⁵.

Disability Action NI's election manifesto 2023 said:

Life costs more for disabled people and our families. We have always had to spend more on essentials including heating, insurance, and equipment. As the cost of living continues to soar- many of us are facing impossible choices in order to survive and are under severe financial pressure. Many of us including disabled children need lifesaving equipment which is powered by electricity in order to survive- this includes ventilators, feeding pumps, electric wheelchairs, and stair lifts. Energy prices have soared, and we have no options but to pay these costs. For disabled people this is the real cost of living.⁹⁶

As recently as December 2024, the Carnegie Trust found that in Northern Ireland, people living with a disability were amongst those most likely to suffer low levels of

⁹³ <https://www.publichealth.hscni.net/directorate-public-health/health-and-social-wellbeing-improvement/poverty>

⁹⁴ *Op. cit.*, Trussell Trust, *Hunger in Northern Ireland 2023*, p. 27

⁹⁵ <https://www.carersuk.org/media/jb0ah2xh/the-experiences-of-poverty-among-unpaid-carers-in-northern-ireland.pdf>

⁹⁶ *Op. cit.*, Disability Action Election Manifesto 2023.

economic wellbeing; overall, their average collective wellbeing score was significantly lower than that of people without a disability⁹⁷.

Questions the Committee may wish to ask:

When will an NI Anti-Poverty Strategy be issued and become functional? What are the plans for follow-up of the Child Poverty Strategy?

What steps are planned to increase food security amongst households in need? In one example, will the NI authorities re-instate Free School Meals over summer and breaks for children in need?

What steps are planned to reduce the hardship of people with 'No Recourse to Public funds designation'?

What will be done to do away with the 5-week wait for Universal Credit payments?

What can the authorities do to address the disproportionate level of poverty amongst NI people living with a disability?

7.3 The right to adequate housing

Affordability

In this context, PPR took a closer look at household living costs in NI (see **Appendix 2**) and communicated its findings to the UN Special Rapporteur on the Right to Adequate Housing, in response to that office's global call for inputs on housing affordability⁹⁸. PPR's 2023 analysis showed that for the estimated 9% of NI families in Housing Executive social tenancies, monthly rent would on the face of it just be more or less covered by the housing element component of Universal Credit. For the 4% of families in Housing Association social tenancies, the picture was more complex; whether or not the Universal Credit housing element above would stretch to cover rental costs for the whole month would depend on household and property characteristics. The estimated 13% of NI households in private rented accommodation face higher average rents which are not covered by the monthly housing element of Universal Credit.

The consequences can be stark. NISRA data⁹⁹ indicates that in in 2022-23, the number of households presenting as homeless due to '**loss of rented accommodation**' was 2,892 – an increase of over 70% in three years, and the highest seen since 2007-08, in the wake of the global financial crisis and recession.

Since then, rents have continued to rise. Data analysis from Ulster University and the Housing Executive indicates that average NI rents increased by 4.4% in the first half of 2024 to

⁹⁷ Life in the UK: Northern Ireland 2024, Carnegie UK and IPSOS at https://d1ssu070pg2v9i.cloudfront.net/pex/carnegie_uk_trust/2024/11/19170249/LiUK-Northern-Ireland-2024-FINAL.pdf, pp. 7, 13.

⁹⁸ See https://issuu.com/ppr-org/docs/ppr_questionnaire_submission.docx

⁹⁹ <https://www.communities-ni.gov.uk/publications/northern-ireland-housing-statistics-2022-23>, table 3.8

£886/month (up 8.5% on the same period last year)¹⁰⁰. In Belfast, these figures were even higher: an increase of 7.4% in the first half of 2024, to an average of £1,019/month, equating to a 10.4% increase on the same period last year¹⁰¹.

The analysts noted a marked downward trend in the overall number of private rentals over the long term (the number of private lettings in the 2nd half of 2023 was less than half that in 2014 (p. 22)). They attributed the decline in part due to lack of rental stock, landlords exiting the sector and rising vacancy in private rentals as people struggle to afford the current level of market rents. In terms of affordability, they noted that the average NI rent, while varying across regions, was roughly 33.4% of the median household income; but amongst renters in the lower quartile of income, the lower quartile of private rent rose to 45.4% of their household income (p. 16).

The policy response has been inadequate and potentially misdirected, towards benefitting households with more income¹⁰². PPR shared with the Special Rapporteur our concerns about the Department for Communities' 2021 redefinition of 'affordable housing' to include intermediate housing – for households with more resources – in addition to social housing for those with greater objective need¹⁰³. Belfast City Council's local development strategy sets ambitious targets for new housing aimed at new residents¹⁰⁴ – without explicitly addressing the acute housing need of the city's (now over) 9,000 FDA homeless households¹⁰⁵.

Most recently, the NI-specific 'housing affordability' content of the UK government's August 2024 response to the Committee's List of Issues report focuses on a new funding allocations to the 'Co-Ownership' housing association. According to the text, this is mostly aimed at first time buyers, but also includes a new 'Rent to Own' pilot. While welcome initiatives, these clearly are targeted towards people on intermediate incomes who can afford them; there is no mention of programming for people with Full Duty Applicant homeless status or others in acute housing need.

Questions the Committee may wish to ask:

How the devolved NI authorities how they define affordable vs social housing, and how many units of affordable v social housing are planned for the areas of highest housing need in Belfast.

¹⁰⁰ https://www.ulster.ac.uk/__data/assets/pdf_file/0010/1655173/PrivateRentalReport_H1-2024.pdf, pp. 3 and 9.

¹⁰¹ *Ibid.*, pp. 3 and 9.

¹⁰² The DFC's policy focus on providing more intermediate housing, has included, for instance, intermediate housing for rent, which its own consultation report described as "a fairly niche product" (https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/Intermediate%20Rent%20Consultation%20Outcome%20Report_2.pdf, p. 80). PPR's response to the consultation on this is at https://issuu.com/ppr-org/docs/ppr_response_-_intermediate_rent.docx.

¹⁰³ See https://issuu.com/ppr-org/docs/affordable_housing_fin_sept_2019.docx

¹⁰⁴ https://www.belfastcity.gov.uk/getmedia/473f71a1-e0d2-431a-971b-def39e550934/DPS001_DPS.pdf, p. 34.

¹⁰⁵ See <https://www.nlb.ie/blog/2021-09-the-equality-cant-wait-build-homes-now-campaigns-input-to-the-belfast-agenda-call-for-evidence> and <https://www.nlb.ie/investigations/FOI/2024-06-12-726-households-on-the-social-housing-waiting-list-and-no-sign-of-a-solution>

How in the state's view does a focus on development new 'intermediate' housing models help the affordability gap facing lower-income renters?

What protections NI authorities envisage for private renters at risk of homelessness due to high rent levels and lack of available social housing?

Accessibility: inadequacy of social housing provision

Our previous (January 2023) submission described the inadequate supply and poor conditions of social housing in Northern Ireland, and the disproportionate impact that these have on specific communities including the Catholic community, asylum seekers and refugees, women, children and young people and disabled people.

Appendix 3 continues data analysis of deprivation and social housing provision. The claim in our political system is that social housing provision *is* in proportion to need. What our analysis shows is that social housing stock – decimated not least by the 'House Sales Scheme' / right-to-buy¹⁰⁶ -- is not provided in proportion with deprivation. It does not appear to have been built over the years in response to actual need; or at the very least, provision of social housing today is extremely non-uniform and patchy in relation to deprivation. This could be rectified, by providing new social housing in proportion to need, which would prioritise those areas that have lost out, over time – if it were a priority.

What does the need look like today? In 2023/24, according to information received through Freedom of Information, the year up to end Sept 2024 saw a social housing waiting list of 48,366 households. The waiting list households included over 27,700 children under 18 whose internationally-recognised right to develop to their full potential is hampered by the lack of a secure and safe home¹⁰⁷. Moreover, more than 30,658 of the households on the waiting list are recognised as Full Duty Applicant homeless by the Housing Executive, including over 19,000 children¹⁰⁸. This constitutes a rise of three quarters on the March 2018 figure of 11,300 children in homeless households. Over the 2023/24 fiscal year, just 5,710 social homes across the north were allocated to new tenants--- the equivalent of roughly one in every 8 households on the NI waiting list – or one in every 5 homeless households.

In areas of high demand, social housing need remains concentrated in predominately Catholic areas: analysis of end 2023 statistics, for instance, revealed that of Belfast's 8,725 homeless

¹⁰⁶ Analysis by the Nevin Economic Research Institute (NERI) at https://www.neriinstitute.net/sites/default/files/research/2019/housing_inbrief.pdf shows that in 1981 the percentage of NI households in Housing Executive social homes was over 39%. This dropped markedly over each of the next two decades, falling to just 11.5% in 2011; today just one in ten households are Housing Executive tenants, with an additional 4% in housing association social homes (statistics at <https://datavis.nisra.gov.uk/communities/northern-ireland-housing-statistics-2022-2023.html>). This is due to the House Sales Scheme ('right to buy'), introduced in the 1980s and still running today for Housing Executive homes. It saw over 120,000 NI properties sold at a discount rate to tenants in a bid to encourage home ownership, though a substantial proportion of these homes are now part of the private for-profit rental market (see <https://www.nihe.gov.uk/getattachment/19ee114c-6e00-4702-b4fb-386837a72c9a/House-Sales-Scheme-Report.pdf> p. 40). The Housing Executive's current stock stands at around 86,000 homes.

¹⁰⁷ <https://www.nlb.ie/blog/2024-06-some-things-you-don-t-want-to-become-routine-child-homelessness-has-reached-a-new-high-again>

¹⁰⁸ *ibid.*

households at that time, 2,131 were in North Belfast, 78.3% of them in predominately Catholic areas. Another 3,141 were in West Belfast, 89.7% of them in such areas¹⁰⁹. We note that the Department for Communities recent Housing Supply Strategy- A Home for Everyone concedes PPR's long-standing commentary on the existence of religious inequality, without however, making any concrete suggestion as to how this will be addressed and furthermore with no apparent attention of any focused monitoring to see how the Strategy's implementation affects outcomes:

Under religious belief, there are a higher proportion of lead applicants on the waiting list for social housing that are in housing stress, from the Catholic community, relative to the Protestant community.¹¹⁰

This Committee has a long history of scrutinising religious inequality in access to the right to adequate housing, particularly in North Belfast. Oddly, though the UK government's August 2024 response to the Committee's List of Issues report does include a section entitled 'Inequalities in Housing in Northern Belfast' (p. 39), that text does not address religious inequality in housing at all. Rather it reports on "the Tackling Paramilitary Activity, Criminality and Organised Crime Programme", which it describes as "a public health-based approach to violence reduction jointly funded by the NI Executive and UK Government (currently around £16 million per year) until March 2025". The section under 'discrimination' above, on the August 2024 racist violence and its aftermath, describes how across NI society, concerns about the impact of the state's habitual 'development' approach in communities affected by high levels of paramilitary control are surfacing as never before.

Separately, the UK's failure to address the point of the Committee's questions, and the total absence of content addressing the Committee's historical and ongoing concerns about religious inequality in social housing need and provision in North Belfast and elsewhere in Northern Ireland, are inexcusable and need to be called out.

As of end June 2024, out of 762,000 occupied homes in Northern Ireland, 64% were owner-occupied, 17% privately rented and 16.3% were social rentals-- – around seven out of ten of them in Housing Executive homes, and the remainder in social homes managed by housing associations¹¹¹.

At the current average rate of new build construction, according to NI Statistics and Research Agency data, it would take around fifty years to build homes for all the households on the waiting list: Since 2010, according to Northern Ireland Statistics and Research Agency data¹¹²,

¹⁰⁹ <https://www.nlb.ie/investigations/FOI/2024-03-child-homelessness-in-belfast-rises-20-in-under-two-years>

¹¹⁰ Department for Communities, 2024, Housing Supply Strategy: A Home for Everyone 2024-2039, <https://www.communities-ni.gov.uk/sites/default/files/2024-12/dfc-housing-supply-strategy-2024-2039.pdf>, p. 17

¹¹¹ <https://www.communities-ni.gov.uk/publications/northern-ireland-housing-bulletin-april-june-2024>

¹¹² <https://www.nisra.gov.uk/publications/ni-profile-0> ('Households' file, Housing 5 tab)

an average of only 941 social homes have been completed every year¹¹³. (Housing Executive data – which includes, in addition to new build social homes, completions of rehabilitation works, purchase of existing homes and more, paints a picture which is marginally less stark.)¹¹⁴

In December 2024 the Department for Communities published its Housing Supply Strategy 2024-2039, retaining the previous (2021) draft's ambition to build 100,000 new homes but dropping its commitment to measures such as ring-fencing of funding to build social housing in areas of the most acute need¹¹⁵.

Questions the Committee may wish to ask:

What concrete, targeted and time-bound steps will the Department for Communities and Housing Executive take to take to address housing inequality in Belfast and reduce housing stress, housing need and homelessness?

How is the failure to use publicly owned vacant land in Belfast – such as the Mackie's site -- to increase the supply of social housing compatible with both the right to housing and devolved commitments to increasing housing supply?

What proportion of Full Duty Applicants the Housing Executive expect to house through existing provision and what proportion they expect to house through new social provision over the next five years?

Why does the information provided by the UK Government on North Belfast fail to address religious inequality in acute housing need and access to social housing? Was the State Party and/or the devolved government unaware of the Committee's longstanding concern around this issue? For avoidance of doubt, please provide information on concrete, targeted and time-bound steps to address housing inequality in Belfast.

Private rented accommodation

Overall, 13% of NI households (around 129,600, according to Department for Communities statistics) are in private rented accommodation¹¹⁶. Housing quality, and **habitability** are not

¹¹³ In 2001, responsibility for all new build social housing transferred to housing associations. This past year, for the first time in over 20 years, the Housing Executive has started construction of 6 new homes -- in the Ballysillan area of Belfast, an area of relatively low social housing need.

¹¹⁴ See *inter alia* <https://www.nlb.ie/investigations/FOI/2023-08-social-housing-development-in-northern-ireland-who-is-counting>. In another data anomaly, the Housing Executive keeps its housing need figures under one geographic coding system, which it refuses to make public; while recording social housing development data under a different, publicly available geographical mapping. This makes it impossible to match need against provision and makes the entire system more opaque, reducing trust (see *inter alia* <https://www.nlb.ie/investigations/policy-watch/4/11-2024-a-win-for-logic-a-win-for-transparency-using-the-2021-census-to-fill-a-crucial-information-gap>).

¹¹⁵ <https://www.communities-ni.gov.uk/sites/default/files/2024-12/dfc-housing-supply-strategy-2024-2039.pdf>; see coverage at, *inter alia*, <https://www.bbc.co.uk/news/articles/c8xjqy0gedyo> and <https://www.housingtoday.co.uk/news/northern-ireland-executive-endorses-pledge-for-100000-homes-by-2039/5133276.article>

¹¹⁶ <https://datavis.nisra.gov.uk/communities/northern-ireland-housing-statistics-2022-2023.html>

guaranteed- there is no active enforcement mechanism for the DFC's Decent Homes Standard¹¹⁷, and low-income private tenants – as well as social housing tenants – can face issues such as serious damp and mould, insufficient heating, vermin infestation and maintenance and repair needs – all too often, with unresponsive landlords.

In terms of **affordability**, as mentioned above rents in this sector are higher than in social housing and there is a significant gap between these elevated private rents and the amount of housing benefit that low-income households receive, with many cash-strapped families struggling to make up the difference¹¹⁸. Additional factors such as the rising cost of energy, fuel and household essentials have increased the financial pressures people are juggling, pushing some, ultimately, into homelessness.

Questions the Committee may wish to ask:

Without monitoring and enforcement, standards remain a paper exercise. When will such mechanisms be established for the Department for Communities' Decent Homes Standard?

In light of the significant gap between housing benefit / Universal Credit housing component and actual market rents, what steps are envisioned to close that shortfall?

Housing Executive emergency accommodation in hotels

Homeless figures in Northern Ireland have risen from 12,450 households at end March 2014 to 30,069 households at end June 2024 – a rise of 140% in just over 10 years¹¹⁹.

As discussed elsewhere, a shortage of social housing has meant that the NI Housing Executive increasingly relies on temporary accommodation to fulfil its duty to house homeless people. This is part of a growing trend; according to DFC statistics, over the last six years the number of households placed in temporary accommodation in the north has more than doubled, from 2,065 in January 2019 to 4,908 by November 2024¹²⁰. Those 4,908 households included between them 5,378 children under 18 – again, more than double the total in January 2019.

According to NIHE's own figures for 2023/24, there were 11,368 placements in temporary accommodation across the north, costing £34.4million in that year alone¹²¹; against this the Communities Minister's December 2024 announcement of an additional £3.7million for homelessness services seems – as noted by some in the sector – little and late¹²². Meanwhile

¹¹⁷ <https://www.communities-ni.gov.uk/decent-homes-standard>

¹¹⁸ See <https://www.nlb.ie/investigations/FOI/2023-04-affordable-to-whom-exactly-homelessness-and-the-affordable-housing-future>. Local Housing Allowance rates for NI are set by the Housing Executive; the latest rates are at <https://www.nihe.gov.uk/housing-help/local-housing-allowance/current-lha-rent-levels>.

¹¹⁹ See <https://www.nlb.ie/investigations/policy-watch/162/ten-years-of-steadily-rising-housing-stress-and-homelessness-both-in-belfast-and-across-ni>

¹²⁰ <https://www.communities-ni.gov.uk/publications/northern-ireland-homelessness-bulletin-april-september-2024>

¹²¹ See minutes of NIHE presentation to the Belfast City Council People and Communities Committee at <https://minutes.belfastcity.gov.uk/documents/g11692/Public%20reports%20pack%2001st-Oct-2024%2018.00%20Council.pdf?T=10>, from p. 46.

¹²² <https://www.communities-ni.gov.uk/news/minister-announces-additional-funding-homelessness>; see also <https://www.bbc.co.uk/news/articles/c93857xv9z9o>.

acute need continues to grow: as this report was being drafted in late November 2024, the overstretched emergency housing system was strained to the limit by several days of heavy rainfall and subsequent flooding that led to what a Housing Executive spokesperson described as “unprecedented and record-breaking levels of people presenting to us seeking emergency temporary accommodation”¹²³.

In addition to the more traditional hostel and single let models of temporary accommodation, NIHE reliance on ‘non-standard’ temporary settings such as privately-owned hotels and B&Bs has increased by 151% since 2020. PPR frequently receives complaints from homeless families expressing concern about the quality and suitability of such settings for themselves and their children¹²⁴. MLAs and others have questioned the effectiveness of such settings at meeting the needs of individuals experiencing mental health or addiction issues¹²⁵. Media attention has focused on issues such as the disruption to family life caused by frequent moves between different temporary hotels¹²⁶. A range of civil society groups have called for urgent action¹²⁷, and affected families have called for measures such as using public land such as the Mackie’s site to build social housing¹²⁸.

Questions the Committee may wish to ask:

What steps are the Department for Communities and Housing Executive taking to reduce reliance on expensive emergency accommodation in hotels, and to increase the supply of social housing owned by the state?

What measures are foreseen to increase the resilience and capacity of the Housing Executive’s system for fulfilling its duty to house homeless individuals and families?

A way forward: the TakeBackTheCity campaign

As an update about the campaign since our last submission, in March 2023 NI Opera debuted 'Nobody / Somebody', an opera about the campaign for much-needed social housing on the 26 acre, vacant, publicly-owned Mackie’s site in West Belfast; the debut was attended by 500 people¹²⁹. By the time the campaign’s Mackies masterplan design competition (described in our last submission) closed for voting shortly thereafter, 1,195 online votes had been cast and 406 comments left. In addition, in-person outreach events in autumn and winter 2022/23 reached 350 local people and duty bearers.

¹²³ <https://www.bbc.co.uk/news/articles/crr94w55dzgo>

¹²⁴ See *inter alia* <https://www.nlb.ie/blog/2024-11-belfast-s-housing-crisis-big-business-for-hotel-owners>

¹²⁵ See AQW 18924/22-27 at <https://aims.niassembly.gov.uk/questions/search.aspx>.

¹²⁶ <https://www.belfastlive.co.uk/news/northern-ireland/ni-mum-familys-experience-homelessness-30491338>

¹²⁷ <https://www.northernirelandworld.com/community/over-58000-people-are-homeless-in-ni-homelessness-sector-says-its-time-for-change-4894213>

¹²⁸ <https://www.belfastlive.co.uk/news/evicted-single-mother-urges-stormont-30689894>;

<https://www.breakingnews.ie/ireland/evicted-single-mother-urges-stormont-to-build-houses-on-vacant-site-1713292.html>; <https://www.irishnews.com/news/northern-ireland/evicted-single-mother-urges-stormont-to-build-houses-on-vacant-mackies-factory-site-EHKOPBFJTFGAJNXVXLZHRYQBWA/>

¹²⁹ <https://www.nlb.ie/blog/2023-03-sold-out-somebody-nobody>

After the London firm Matthew Lloyd Architects was declared the competition winner in June 2023, the rest of the year focused on direct engagement, in writing and in meetings, with interlocutors including duty bearers (Belfast City Council, NIHE, Department for Communities, Invest NI, Department for Infrastructure, statutory bodies etc), political parties and a range of civil society groups, schools, housing associations, academics, developers and more.

In addition, in May 2024 organisers and campaigners [met](#) the UN Special Rapporteur on the Right to Adequate Housing, Balakrishnan Rajagopal, in Belfast. They told him about their personal experiences of the broken housing system here, but also about their hopes for the Mackies plan. Between 2020 and September 2024 the campaign helped individuals and families submit at least 237 housing complaints.

Questions the Committee may wish to ask:

The State Party's August 2024 response to the List of Issues report mentions land availability as a critical issue and a key challenge to development of social housing (p. 40). Will the authorities commit to increasing supply by using public land like the 25-acre Mackie's site to build social homes?

We are aware that the Housing Executive recently completed [its first homes](#) since 2001 -- albeit not in an area of particularly high housing need. What more is envisioned to increase its capacity to build social homes, and to target that building to areas of high demand?

What concrete measures are underway to increase the supply of social housing generally?

In the interest of public transparency, what steps are being taken to rationalise the data on social housing building? Will the Housing Executive make public the mapping system it uses to track and record housing need, so that this data can be matched against social housing development data?

8. Right to physical and mental health (art. 12)

8.1 The state party's approach to mental health is not human rights compliant

The dominant narrative shaping current policy approaches to mental health at in Northern Ireland is an individualised, medicalised one. The Northern Ireland Executive's ten-year Mental Health Strategy 2021-2031, which, according to the State Party's submission to this Committee, sets out the strategic direction for mental health, perpetuates this narrative and is essentially a reconfiguration of existing services. It fails to address key issues, including the medicalisation of emotional distress and trauma, the overprescribing of antidepressants, lack of data, failures of regulatory oversight, the absence of a duty of candour or a culture of learning from past mistakes and harm caused. It is not human rights compliant, trauma informed or transformative in its approach.¹³⁰ The sole commitment to mental health in the

¹³⁰ https://www.nlb.ie/blog/2021-04-mental_health_strategy_is_asking_the_wrong_questions

draft NI Executive's 3-year Programme for Government is to the continued implementation of this flawed Strategy.¹³¹

Public health messaging on mental health mirrors this individualised approach, as encapsulated in the Public Health Agency's Take 5 Steps to Emotional Wellbeing¹³².

The 'solutions' to the deepening mental health crisis being experienced in this post-conflict society, which has significant levels of inter-generational trauma, are limited to the need for increased funding, staffing and reducing waiting lists. While all of these are without question barriers to the availability, accessibility, acceptability and quality of mental health care, there is a pressing need for a deeper, paradigm shift in relation to mental health. This is consistent with what is being experienced across the globe, where the 'frozen status quo' on mental health is no longer fit for purpose.

New Script for Mental Health,¹³³ a rights-based campaign supported by PPR, has developed a new initiative called Give 5: Steps to a Wellbeing Rights Framework.¹³⁴ This high-level framework is intended for duty bearers with responsibility to respect, protect and fulfil people's right to good mental health.

It mirrors the structure and format of the state's Public Health Agency's Take 5¹³⁵, a public health campaign focused on individual's emotional wellbeing, with the intention of conveying the message that *'you can't have one without the other'*. Without the state taking the actions set out in Give 5, it is placing too heavy a burden on individuals to improve their own mental health, as per its Take 5 campaign.

The Give 5 framework can be summarised as follows:

1. **Connect symptoms to causes** – Address the root problems of emotional distress and trauma, like poverty and discrimination.
2. **Be active in offering more healing options** – Mental health treatment isn't one-size-fits-all. Reduce the unnecessary overprescribing of antidepressants.
3. **Take notice of people's positive healing experiences.** Listen to those who've lived it – Their experiences hold the key to better solutions.
4. **Keep Learning from past mistakes.** Challenge organisational cultures of secrecy, defensiveness and blame, to prevent further harm and deaths.
5. **Give people the dignity, compassion and hope** to which they are entitled. Human rights must be reflected in mental health, housing and in all aspects of people lives.

¹³¹ <https://www.northernireland.gov.uk/sites/default/files/consultations/newnigov/draft-programme-for-government-our-plan-doing-what-matters-most.pdf>

¹³² <https://www.publichealth.hscni.net/publications/take-5-steps-wellbeing>

¹³³ www.nlb.ie/campaigns/mental-health

¹³⁴ <https://www.nlb.ie/take-action/give-5>

¹³⁵ <https://www.publichealth.hscni.net/publications/take-5-steps-wellbeing>

This framework was launched on 10th October 2024, World Mental Health Day, in Belfast, Northern Ireland.¹³⁶ Professor Dainius Puras, former UN Special Rapporteur on the Right to Health, was the keynote speaker.¹³⁷ Each of the 5 Steps is supported by a collated evidence base¹³⁸, which includes the work of the United Nations Office of the High Commissioner for Human Rights and the office of the UN Special Rapporteur on the Right to Health. It has been endorsed by key organisations and bodies, including UNISON, the lead union for health workers in Northern Ireland.

Suggested Question the Committee may wish to ask:

Will the state party endorse the Give 5: Steps to a Wellbeing Framework and ensure that it is integrated into the NI Executive's approach to mental health at all levels?

8.2 Antidepressant Prescribing

Official data from the Department of Health's Business Services Organisation (BSO) indicates that 40% of females in Northern Ireland, aged 45-64 years, were prescribed an antidepressant in the year 2023-2024.¹³⁹ The overall rate of prescribing is 20%, but in the poorest communities this rises to almost 27% of the population.

The past 20 years has seen a four-fold increase in prescribing rates, with women, older people and the poorest communities being disproportionately impacted.

The New Script for Mental Health campaign has highlighted how this inexorable rise in prescribing constitutes a major public health issue.¹⁴⁰ In 2023, the antidepressant budget was just under £13 million, while spending on talking therapies was under £3million, across the five Health and Social Care Trusts.

The Department of Health has stated that research would be required to understand reasons for the increase in antidepressant prescribing but has not indicated that it intends to undertake such research.¹⁴¹ It has also stated that it has no plans to explore the benefits of non-pharmaceutical treatments of depression compared to pharmaceutical treatments, including potential side-effects.¹⁴²

¹³⁶ <https://www.irishnews.com/news/northern-ireland/protection-and-promotion-of-right-to-good-mental-health-essential-belfast-mental-health-day-conference-told-BMCWPOKZEBFVFBV2UG4FBIXMJU/>

¹³⁷ <https://www.library.nlb.ie/book/91>

¹³⁸ <https://www.nlb.ie/take-action/give-5?item=connect>

<https://www.nlb.ie/take-action/give-5?item=active>

<https://www.nlb.ie/take-action/give-5?item=notice>

<https://www.nlb.ie/take-action/give-5?item=learning>

<https://www.nlb.ie/take-action/give-5?item=give>

¹³⁹ <https://bso.hscni.net/wp-content/uploads/2024/06/General-Pharmaceutical-Service-Statistics-for-NI-2023-24-Report.pdf>

¹⁴⁰ <https://www.nlb.ie/blog/2024-07-call-for-chief-medical-officer-to-show-leadership-in-tackling-rising-antidepressant-rates>

¹⁴¹ <https://aims.niassembly.gov.uk/questions/printquestionsummary.aspx?docid=409390>

¹⁴² <https://aims.niassembly.gov.uk/questions/printquestionsummary.aspx?docid=406980>

In May 2024, a Westminster Parliamentary All-Party Group, Beyond Pills, launched a report *Shifting the Balance Towards Social Interventions*,¹⁴³ which called for radical change with a shift towards more social interventions and away from pharmaceutical and other purely biomedical ones. It recommended that government reverse rates of unnecessary antidepressant prescribing. This report contains practical calls to actions that should be implemented by the state party and its devolved administrations.

Suggested question the Committee may wish to ask:

Will the state party take all necessary steps to reduce the unnecessary overprescribing of antidepressants, including widening the range of therapeutic options available to people experiencing depression?

8.3 Mental Health Data

Lack of data on mental health services in NI is significantly undermining rights-based accountability.¹⁴⁴

It has been highlighted by a range of local and UK wide scrutiny bodies, including the UK Office for Statistics Regulation¹⁴⁵, the Northern Ireland Audit Office¹⁴⁶ and most recently, in June 2024, by the NI Assembly's Public Accounts Committee¹⁴⁷.

In 2023, the Northern Ireland Audit Office was unable to assess whether mental health services represented value for money, due to the dire lack of data across all mental health services.

Data sets which are not publicly available include:

- Number of people seen and outcomes from GP practice-based counselling.
- Outcomes from statutory, Health Trust Talking Therapies
- Number of GPs trained in suicide prevention.¹⁴⁸
- Readmissions rate to mental health in-patient units from some Trusts
- Numbers of people who receive multiple prescriptions for antidepressants within a year.
- Waiting lists for adult mental health assessment
- Waiting lists for psychology services
- Regulation of community mental health services.

¹⁴³ <https://beyondpillsappp.org/wp-content/uploads/2024/05/Beyond-Pills-APPG-Shifting-the-Balance-Report-2024-1.pdf>

¹⁴⁴ <https://www.nlb.ie/blog/2024-05-no-evidence-base-no-activity-data-no-outcomes-data-equals-no-accountability>

¹⁴⁵ <https://osr.statisticsauthority.gov.uk/publication/review-of-mental-health-statistics-in-northern-ireland/>

¹⁴⁶ <https://www.niauditoffice.gov.uk/publications/mental-health-services-northern-ireland>

¹⁴⁷ <https://www.niassembly.gov.uk/assembly-business/committees/2022-2027/public-accounts/reports/public-accounts-committee---report-on-mental-health-services-in-northern-ireland/>

¹⁴⁸ <https://www.nlb.ie/investigations/FOI/2023-09-analysing-the-department-of-healths-protect-life-2-suicide-prevention-strategy>

Without the availability of timely, accurate, reliable, coherent, and comparable data, it is impossible to plan services effectively. It is impossible to assess outcomes. It is impossible for parliamentarians, oversight bodies or the public to hold the Department of Health and the Health Trusts to account for how public money is being spent.

Suggested Question the Committee may wish to ask:

Will the state party develop a concrete, time-bound and targeted action plan to respond to the recommendations on mental health data made by the UK Office for Statistics Regulation, the NI Audit Office and the NI Assembly's Public Accounts Committee?

8.4 Regulation and oversight of mental health services

It is the view of PPR that the statutory regulator for mental health services in Northern Ireland, the Regulation and Quality Improvement Authority (RQIA),¹⁴⁹ is not fit for purpose as an independent regulator of mental health services.¹⁵⁰

In 2009, via the Health and Social Care Reform Act (NI) 2009, the powers of the previous Mental Health Commission were transferred to the Regulation and Quality Improvement Authority (RQIA), the health regulator, against the advice of the Mental Health Commission,¹⁵¹ with a consequent weakening of regulation and oversight and of independence from the Department of Health.

In 2023, a Judicial Review taken by a New Script for Mental Health campaigner, on behalf of his disabled nephew due to the failures of the state to provide him with adequate and appropriate care and services, uncovered the fact that the RQIA had neglected its legal duty to regulate community mental health services for 14 years¹⁵².

More than a year since that Judicial Declaration, there is no evidence to suggest that RQIA is effectively regulating community mental health services. RQIA insists that their approach is 'intelligence led,' yet in 2023 only ten mental health related concerns were raised, with not a single concern raised by a 'service user'. In June 2024, RQIA informed the Northern Ireland Assembly's Health Committee that it had developed a new Interim Inquiry Protocol but refused to furnish families involved in New Script for Mental Health with a copy of this protocol or provide any details of its progress.

Moreover, RQIA failed to establish two External Reference Groups, with patient and carer representation, committed to in 2009, to advise its inspection of mental health services.

Finally, RQIA is failing in its inspection of in-patient mental health services, with gaps in the inspection regime and repeated failures to ensure implementation of its inspection recommendations.

¹⁴⁹ <https://www.rqia.org.uk/>

¹⁵⁰ <https://www.nlb.ie/blog/2024-04-mental-health-campaigners-call-on-health-committee-to-investigate-watchdog-failures>

¹⁵¹ <https://www.niassembly.gov.uk/assembly-business/official-report/committee-minutes-of-evidence/session-2007-2008/july-2008/health-and-social-care-reform-mental-health-commission/>

¹⁵² <https://www.nlb.ie/blog/2023-05-legal-victory-on-oversight-of-mental-health-services>

Suggested questions the Committee may wish to ask:

Does the State Party accept that the current regulatory mechanism for mental health services are not human rights compliant?

Will the State Party commit to the establishment of an independent, adequately resourced, human rights compliant regulatory mechanism for mental health, equipped with the necessary powers?

8.5 Use of Electroconvulsive therapy (ECT) is not human rights compliant

Informed consent to a medical procedure is a human rights issue. Without accurate information, informed consent cannot be given. People currently cannot make an informed decision regarding their treatment in relation to Electroconvulsive Therapy (ECT) because research has indicated that they are not told of all possible risks and side effects, thereby undermining the ethical principle of informed consent.¹⁵³ Research has shown that patients and families across the UK are systematically being misled about the risks they are taking and the nature of ECT's benefits.¹⁵⁴ Under the Mental Health (Northern Ireland) Order 1986 a person can be given ECT against their will in certain situations.

The five Health and Social Care Trusts in Northern Ireland currently cannot provide data on whether people who received ECT were offered recommended psychological therapies in the months leading up to their treatment, in line with best practice guidelines set out by the National Institute of Clinical Excellence (NICE).¹⁵⁵

The Royal College of Psychiatrists in their patient information leaflet cannot give a definitive answer for how ECT works and say there is ongoing research to understand it better.¹⁵⁶

Suggested questions the Committee may wish to ask:

Will the State Party ensure that patients being offered ECT are fully informed of all possible risks and side effects, so they can make an informed decision as to whether to accept it?

Will the State Party commit to carrying out an independent audit of the administration of ECT in all jurisdictions of the UK?

7.5 Privatisation of health services is undermining people's right to mental health care

The CESCR Committee's General comment No. 24 (2017) on state obligations under the International Covenant on Economic, Social and Cultural Rights in the context of business activities places a level of obligation on states to deliver essential services. It makes it clear that there is an assumption that quality public services are required to fulfil economic, social

¹⁵³<https://www.nlb.ie/blog/2023-11-out-of-sight-out-of-mind-rights-consent-and-electroconvulsive-therapy>

¹⁵⁴ Read, J., Morrison, L. & Harrop, C. (2023) An independent audit of Electroconvulsive Therapy patient information leaflets in Northern Ireland, Scotland and Wales. *Psychology and Psychotherapy: Theory, Research and Practice*, in press.

¹⁵⁵ <https://www.nice.org.uk/guidance/ta59>

¹⁵⁶ <https://www.rcpsych.ac.uk/mental-health/treatments-and-wellbeing/ect>

and cultural rights. In particular, paragraph 23 reads: “*The obligation to fulfil requires States Parties [...] in certain cases, to **directly provide goods and services essential to such enjoyment.***”

Increasing numbers of NHS funded GP practices in Northern Ireland are closing or amalgamating, particularly in rural areas and border counties.¹⁵⁷ Alongside this, there has been a rapid growth in the establishment of private GP practices. This has extremely significant implications for equality of public access to mental health care, given that GPs are designated as the first port of call for people struggling with their mental health. It is potentially discriminatory in its impact on particular groups of people, including people living in poverty, people living rurally, many of whom are older, and people with disabilities.

In addition, statutory mental health and learning disability inpatient services are increasingly staffed by agency workers, which again has serious implications, not least for ensuring trauma informed, safe and quality care¹⁵⁸. Lengthy waiting lists and the rationing of services such as psychology, talking therapies and autism,¹⁵⁹ means that more people are being forced to seek private services, further undermining people’s right to public mental health care.

Suggested questions the Committee may wish to ask:

Will the State Party formally commit to ensuring that essential mental health services, including access to GPs, counselling, psychology and talking therapies, are provided free of charge and in line with objective need?

9. Right to education (arts. 13–14)

NI’s Department of Education reported enrolling 19,470 ‘newcomer’ students – or 5% of the total school population-- in 2022/23¹⁶⁰. It said around seven out of every ten newcomer pupils were in primary school years 1-7.

The information provided indicates that of these, only a relatively small proportion would be from families with experience of the asylum system; for instance, four out of five of the most frequent mother languages amongst the newcomer pupils were European (Polish, Lithuanian, Romanian and Portuguese). The 3rd largest group (just under 8%) was made up of Arabic speakers.

Roughly the same percentage of newcomer children (28%) were entitled to Free School Meals as amongst the wider school population (27%). Overall, 16% of the newcomer children were

¹⁵⁷ <https://www.bma.org.uk/advice-and-support/gp-practices/managing-workload/safe-working-for-gps-in-northern-ireland>

¹⁵⁸ <https://www.bbc.co.uk/news/uk-northern-ireland-62627778>

¹⁵⁹ <https://www.bbc.co.uk/news/uk-northern-ireland-64643344>

¹⁶⁰ <https://www.education-ni.gov.uk/sites/default/files/publications/education/Newcomer%20Pupils%202022.23.pdf>

reported as presenting with Special Educational Needs, compared to 19% amongst the school population as a whole.

Interestingly, the annex (p. 26) to the UK government's August 2024 response to the Committee's List of Issues report refers at length to the body referred to below under 'barriers to education' and new (September 2024) barriers to education'. The description is useful to understanding the issues we raise. According to the UK government text,

the [NI] Department [of Education] also funds the Education Authority's (EA) Intercultural Education Service (IES), which aims to meet the additional educational needs of the newcomer, Roma and Traveller communities by providing advice and support to families with school-aged children. The main areas of support include school admissions, transfers, free school meals, uniforms, transport, multi-disciplinary meetings and appeals- including Special Education, Behaviour Support, Education Psychology and Education Welfare.

As of this writing, many of those services are no longer being offered to some children in asylum-seeking or newly-recognised refugee families. The Department of Education recently opened a consultation on eligibility for free school meals and uniform grant; it runs until February 2025¹⁶¹.

9.1 Barriers to education for children in the asylum system

As reported in our last submission, from mid-2021 people in the asylum system increasingly began to be placed by the Home Office (through its contracted asylum accommodation provider Mears Group) in 'contingency' accommodation in hotels. People placed in these hostel settings reported that many newcomer children could not access a school place¹⁶² -- for primary age children, a violation of even the 'minimum core' of the right to education. With no play, recreational, or alternative activities in the hotels, primary and secondary age children out of school felt acutely the lack of social contact, structure and a daily routine.

By autumn 2022, enrolment of primary age children (aided by Anaka Women's Collective¹⁶³) had improved, but parents of older children faced ongoing barriers, as many secondary schools regulated their intake to keep their results high¹⁶⁴. Young people who managed to secure highly sought after places at 'College of Sanctuary' Belfast Met were blocked from attending by the lack of transport assistance, given their very minimal Home Office allowance (now £8.86/week)¹⁶⁵.

¹⁶¹ Consultation documents are at <https://www.education-ni.gov.uk/consultations/review-free-school-meals-and-uniform-grant-eligibility-criteria>

¹⁶² <https://www.nlb.ie/blog/2022-05-accommodating-cruelty-the-use-of-hotels-as-contingency-accommodation-part-two> and <https://www.nlb.ie/investigations/FOI/2022-04-foi-requests-reveal-huge-increase-in-the-use-of-hotel-accommodation-for-asylum-seekers-and-their-families>

¹⁶³ <https://www.instagram.com/anakacollective/>

¹⁶⁴ <https://www.nlb.ie/blog/2022-11-the-kind-economy-human-rights-a-report-on-the-state-of-education-in-contingency-accommodation-pt-2>

¹⁶⁵ <https://www.nlb.ie/blog/2022-11-the-kind-economy-human-rights-a-report-on-the-state-of-education-in-contingency-accommodation-pt-1>. For the allowance amount, see <https://www.gov.uk/asylum-support/what-youll-get>

The transport situation improved markedly in 2023 with the advent of the Department for Infrastructure's public transport travel card scheme, which ran for a year and closed in October 2024¹⁶⁶.

Difficulties in accessing secondary school

The Education and Libraries (NI) Order 1986 sets compulsory school age at 4 years, continuing up until the end of the school year in which the child turns 16¹⁶⁷. The reality for asylum seeker children is different. Key stage 4 (years 11 and 12, so 15- and 16-year-olds) are by far the most unlikely to find a place, though even some 13 and 14-year-olds struggle¹⁶⁸. This issue features in recent research from QUB and the Nuffield Foundation¹⁶⁹ and also from Queens University Belfast and Anaka together with the young people of the 16+ Education Equality Campaign:

the closer a young person from refugee or asylum seeker background is to 15 or 16 – the longer the wait or more difficult to enter traditional education routes. All too often, the only recommendation for these young people are English classes – the same ones adults are in¹⁷⁰.

The Department for the Economy has responsibility for employment and skills training, including apprenticeships, for 16+ young people¹⁷¹; but has yet to adequately respond to the needs of this group.

A 2023 survey carried out by PPR and Anaka amongst 35 Belfast asylum seekers aged 16-25 who were out of education during term time revealed that 40% had attended high school before coming to NI, and another 40% had completed it. These young people have high aspirations and described themselves as working towards a wide range of professions and roles. But they need help in getting there: only 30% reported attending English classes (despite the fact that over half had been here for six months or more). Two thirds of them described their level of English as beginner or pre-intermediate.

In response, beginning in the summer of 2023 Anaka and #KindEconomy partners organised a network of volunteer teachers from the local community and from amongst people seeking international protection here, to set up and provide classes in a range of subjects for young people unable to access what should be theirs by right from the state.

This was followed by a 2023-24 project with Queens University Belfast for the 16+ age group, linking them with trainee English as a Second Language teachers at the university. These classes led on to a participatory research project, the 16+ Education Equality Campaign (referenced above). In contrast to case studies from Leicester (England), Glasgow (Scotland) and Wales, of holistic English language based programmes tailored to the specific needs of

¹⁶⁶ <https://www.nidirect.gov.uk/articles/public-transport-travel-card-asylum-seekers>

¹⁶⁷ <https://www.legislation.gov.uk/nisi/1986/594> para. 46

¹⁶⁸ See for instance <https://www.nlb.ie/blog/2022-11-the-kind-economy-human-rights-a-report-on-the-state-of-education-in-contingency-accommodation-pt-2>

¹⁶⁹ <https://www.qub.ac.uk/public-engagement/Filestore/PubAffFiles/Filetoupload,1862560,en.pdf> (p. 27, 64, 65)

¹⁷⁰ <https://www.library.nlb.ie/book/76>, p. 1

¹⁷¹ <https://www.economy-ni.gov.uk/topics/employment-and-skills-programmes-including-apprenticeships>

this group of young people¹⁷², in NI young people reported that ESOL classes here were aimed at their parents' generation. This made them feel demotivated and unwelcome.

9.2 New (September 2024) barriers to education imposed on children in hotel accommodation

On 23 August 2024 the Committee on the Eradication of all Forms of Racial Discrimination published its Concluding Observations on the UK's implementation of the International Convention on the Eradication of all Forms of Racial Discrimination. In the area of education, it recommended that the UK

- (a) Strengthen its measures to ensure the availability, accessibility and quality of education for children belonging to ethnic minority groups, notably children belonging to Gypsy, Roma and Traveller communities, children of African descent and migrant, asylum-seeking and refugee children.
- (b) Take all measures necessary to reduce the attainment gaps, including by adopting and implementing an action plan to improve education attainment of children belonging to minorities, with specific and tailored measures for pupils belonging to Gypsy, Roma and Traveller communities, pupils of African descent and migrant, asylum-seeking and refugee pupils, and in close consultation with the families of affected communities¹⁷³.

In contrast to these recommendations, NI education authorities appear to be moving in the opposite direction. On 29 August 2024, a number of families placed in hotel asylum accommodation by the Home Office contractor Mears Group, contacted PPR to say that they had just had a meeting with Education Authority staff around children's enrolment for the upcoming school year. They reported that EA staff had made them understand that they would not be able to enrol their children in schools as long as they were residing in the hotel.

Parents were understandably perplexed. In previous years, many children residing in hotels had obtained school places and regularly attended school, with transport, uniform and meals assistance from EA. In fact several children enrolled last year and living in the same hotel as this particular group of parents, continue to do so.

When questioned by PPR, the EA provided two documents (which they described as new 'internal working arrangements'). One stated that the policy change was made on the basis of information from Mears that the average stay for families in the hotels had "fallen significantly to approx. 4-5weeks" (a characterisation that families themselves say is highly inaccurate). On this basis, the new EA advice was, "it is better to wait to make an application for school when in their MEARS dispersal housing as this is likely to be a longer-term school for their child." The EA said it would resume its responsibilities to assist with enrolment and access to Free School Meals, uniform grant and transport assistance if the family had still not been moved at the end of this waiting period¹⁷⁴.

¹⁷² See <https://www.library.nlb.ie/book/45> for more information

¹⁷³ *Op. cit.*, CERD, 2024, para. 46

¹⁷⁴ See <https://www.library.nlb.ie/book/86> for more information

This change was made at a time when official figures of people placed by the Home Office in contingency asylum accommodation in NI hotels have declined to by far their lowest point in over two and a half years¹⁷⁵; demand for the EA's services emanating from asylum seekers is therefore empirically much lower than it has been. Asylum support levels have not changed, leaving families just as reliant as before on Free School Meals, uniform grant and transport assistance; for the EA to write "we are not withholding the right to education from any child" in limiting assistance and access to this vital financial support seems disingenuous. Most importantly, the racist violence of August 2024, some of which was targeted directly against asylum hotels, has left families and children feeling more isolated, vulnerable and fearful than ever. For many, school is the single most significant entry point for integration into the local community; withholding access to it in the wake of such a traumatic time seems misguided at best.

The Education Authority also provided a second document detailing changes with regard to its treatment of children of newly recognised refugees placed in Housing Executive emergency accommodation in hotels. Given, it says, that "there are no predictable time frames as to how long a family will be in this situation or how many moves they will endure into how many diverse localities", children are to remain enrolled in whatever school they were in before the grant of refugee status – no matter how distant that school is from their new accommodation, or how impossible it is for their parents to get them there¹⁷⁶. The EA actually recognises that "unless they are housed in accommodation within walking distance (or a short bus journey) of their original school they are not going to be able to attend school" – but offers no alternatives.

The EA said that it would review these policies at end October, but as of this writing, no further information is available.

Questions the Committee may wish to ask:

When will NI have a functioning Integration Strategy for refugees and asylum seekers? ESOL strategy?

What steps will be taken to ensure that newcomer young people can enter education more quickly and easily; can access their right to education by attending school; and for their right to education to be extended from 16 to 18 years of age?

¹⁷⁵ *Op. cit.* at <https://www.gov.uk/government/statistical-data-sets/immigration-system-statistics-data-tables#asylum-and-resettlement> (table ASY_D09). There were only 301 people in asylum hotels here at end June 2024, down from over 1,000 throughout end 2022 and much of 2023 (these were the statistics available at the time the Education Authority made its decision; more updated ones have come out since and are included elsewhere in this submission).

¹⁷⁶ In just one example of how this policy works out in practice, a BBC press report from September 2024 (at <https://www.bbc.co.uk/news/articles/cx2y4m33pno>) related in detail how one newly recognised refugee family has been forced into debt, having had to borrow money to buy and run a car so that the children can maintain their existing places at their school in Belfast after the family were moved to temporary accommodation in a hotel in Newry 35 miles (56 km) away. An update on this family's most recent enforced move, in November 2024, is at <https://www.bbc.co.uk/news/articles/c98d20xeeeyo>.

What is the NI Department for the Economy doing to improve access for newcomer young people to apprenticeships, ongoing education and training programmes?

What steps will be taken to improve and speed up the system for recognising qualifications young people have achieved outside of NI, and for creation of more formal English language training opportunities as an entry to ongoing education in a wider range of subjects?

Will the Education Authority and Department of Education immediately rescind its August 2024 'internal arrangements' and immediately fulfil all children's right to attend school?

Appendix 1: Deprivation

Figure 1 maps 2021 census data on deprivation by local government / council area in NI. Each black triangle represents a Super Data Zone in a given council area. The triangles have been ranked according to the proportion of households they contain which are deprived in 2 to 4 measures (housing, health, education, employment). So the triangles towards the bottom have lower proportions of deprived households. Those at the top have higher proportions. Looking at these shows that Belfast has the greatest range, with some of its SDZs having less than one in ten of households facing multiple deprivations, but one SDZ having 60% of households living with multiple deprivations.

The purple triangles show the average proportion of households that are deprived in two to four of the areas of concern (education, employment, health and housing) in each Local Government District. Derry and Strabane has the highest proportion of households facing multiple deprivations; Lisburn and Castlereagh has the lowest.

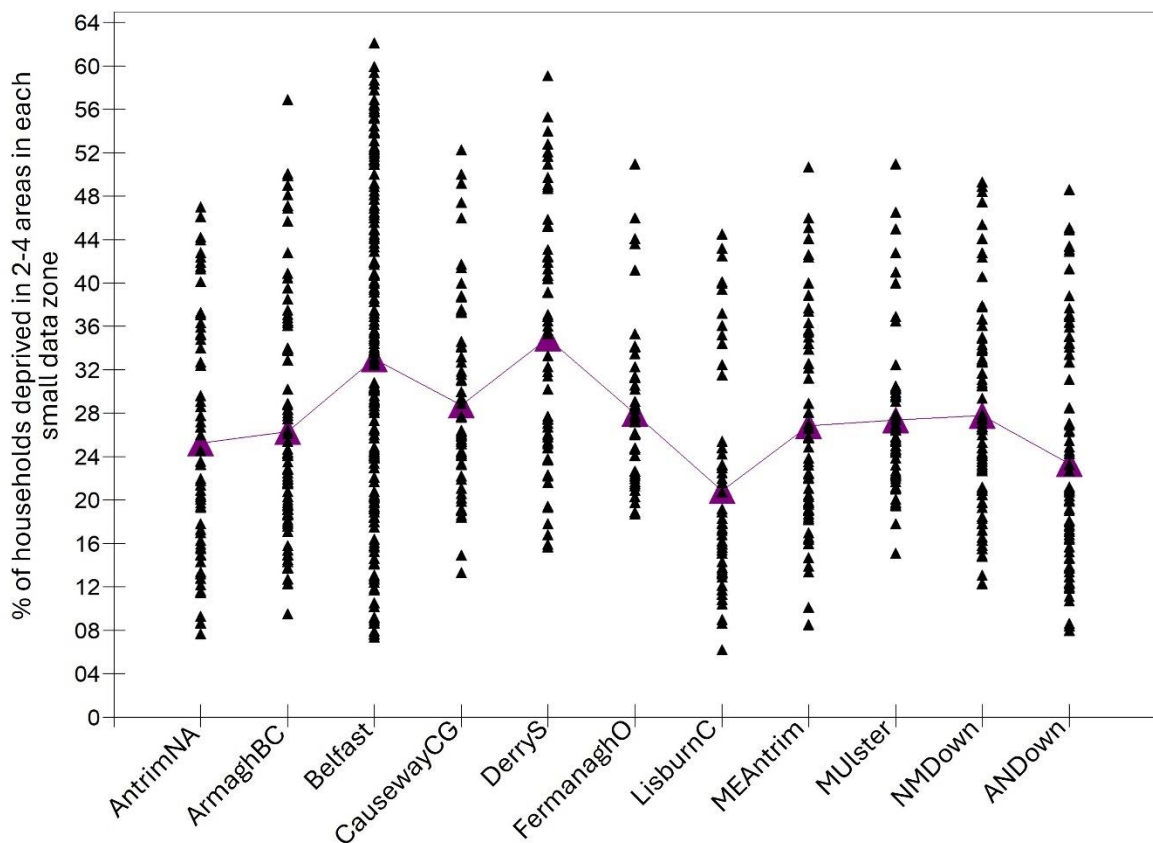


Figure 1: Differences across Small Data Zones (triangles) and Local Government Districts in the % of households that are deprived in 2-4 measures of deprivation. The larger, purple triangles reflect average levels of deprivation in each Local Government District. Each triangle corresponds with the % of deprived households in one data zone. In the Census, deprivation measures related to housing, health, education, employment. Here, more deprived households are deprived in 2-4 measures.

Appendix 2: Housing affordability

In 2023 PPR submitted a Freedom of Information request to the NI Department for Communities referring to the Joseph Rowntree Foundation and Trussell Trust housing affordability research and asking for relevant NI data. The Department for Communities said that it did not hold any information on household food costs; but it did provide this table showing the average housing element component of Universal Credit for households receiving this benefit as at November 2022, by family type:

Family Type	Average housing element amount
Couple without children	£340
Couple with children	£400
Single without children	£310
Single with children	£390

Image caption: Universal Credit rates (housing element)

PPR compared this information with the available data on average housing costs in different property types.

According to the Department for Communities Housing Bulletin, 9% of households live in Housing Executive social homes¹⁷⁷. Housing Executive rents increased by 7% in April 2023, raising the average weekly Housing Executive rent from £69.49 to £74.35. This average weekly rent would on the face of it just be more or less covered by the housing element component of Universal Credit.

For Housing Association social rents – paid according to the Department for Communities Housing Bulletin by 4% of households here¹⁷⁸ – the picture is more complex. The Department for Communities NI Housing Statistics 2021-22 places the average weekly Housing Association rent at £96.20¹⁷⁹; whether or not the Universal Credit housing element above would stretch to cover rental costs for the whole month would depend on household and property characteristics.

For the estimated 13% of NI households in private rented accommodation¹⁸⁰, rents are higher. The NI Housing Statistics bulletin from December 2022¹⁸¹ placed the average weekly

¹⁷⁷ Department for Communities, NI Housing Statistics at <https://www.communities-ni.gov.uk/system/files/publications/communities/ni-housing-stats-21-22-full-copy.pdf> p. 2

¹⁷⁸ *Ibid.*

¹⁷⁹ *Ibid.*, table 3.3c

¹⁸⁰ *Ibid.*, p. 2

¹⁸¹ *Ibid.*, p. 1e

rent in the private sector at £114. This would clearly not be covered by the monthly housing element of Universal Credit.

A closer look at the situation in Belfast is instructive. The Housing Executive reported that in 2021 the average monthly rent in Belfast was £780¹⁸². By mid 2022, it said, the average private rent in Belfast had increased by 9.9% to £853¹⁸³. The rent level faced by the lowest income quartile was estimated at £650/month¹⁸⁴, which is clearly not covered by the Universal Credit housing element- evidence here of a similar 'affordability gap' to that highlighted elsewhere in the UK by the Joseph Rowntree Foundation and Trussell Trust research.

¹⁸² NI Housing Executive, At a Glance: private rental market performance 2021 at <https://www.nihe.gov.uk/getattachment/ad90f920-de78-494b-9d22-3d5aaae25693/private-rental-NI-at-a-glance-H2-2021.pdf>, p. 3

¹⁸³ *Ibid.*, p. 2

¹⁸⁴ *Ibid.*, p. 7

Appendix 3: Social housing accessibility in relation to deprivation

Setting the census data on deprivation levels and social housing provision against each other enables us to map out the expected provision of social housing based on the need indicated by the deprivation figures.

We would hope and expect that the provision of social housing has been designed to be in proportion to need; the more deprived an area is, then the more social housing it should have (for every unit increase in deprivation you'd expect a similar increase in social housing provision). In statistical terms, we'd call this a **positive relationship**: as deprivation increases, social housing provision should increase too.

What does the data tell us? As deprivation increases, does the provision of social housing increase at the same rate? Or do some areas have less social housing than we would expect, on the basis of how deprived they are- and do some less deprived areas have more social housing that we would expect?

Figure 1 below maps all the Super Data Zones in Northern Ireland according to their level of deprivation and the % of social housing they have. **It shows that increasing deprivation and social housing provision are positively related- so we can say that the more deprived an area is, the more likely it is to have social housing.**

But graphs like these are complicated to understand, so let's go through it step by step.

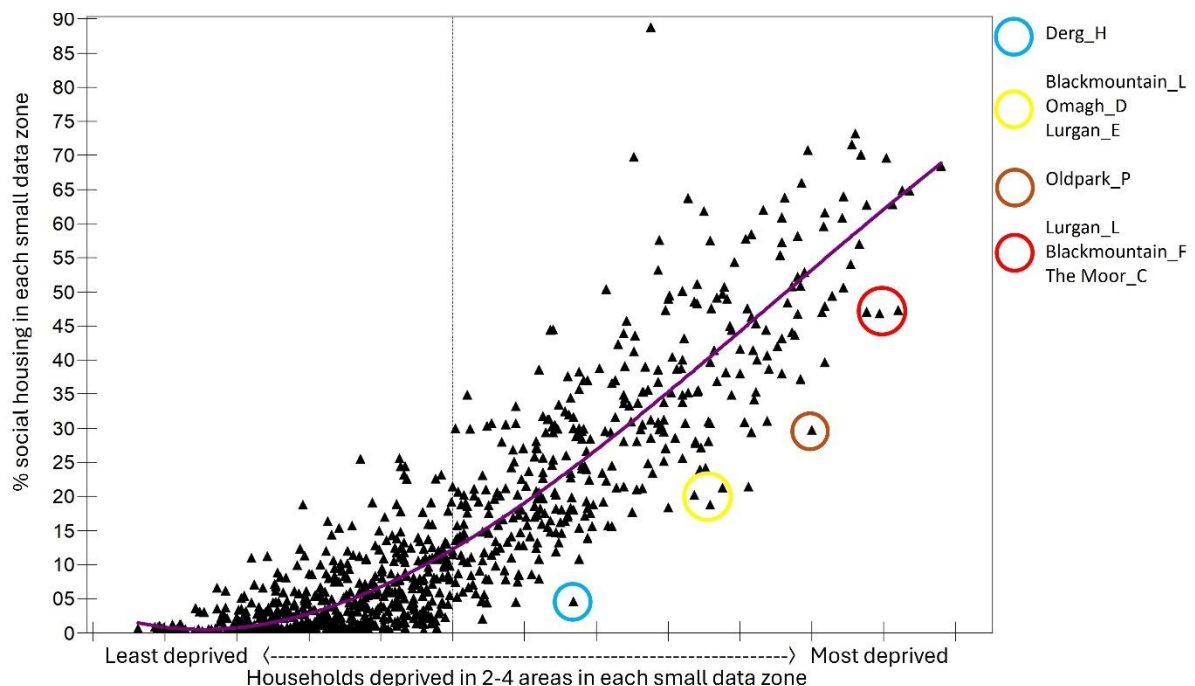


Figure 1: The relationship between deprivation and both actual (the triangles) and estimated (making up the purple line of best fit) social housing provision. Each triangle, which corresponds to a small data zone, has been plotted using two details: the % of deprived households in that zone and the % of social homes in that zone. The purple line helps to give

a sense of the gradient underpinning the relationship between deprivation and social housing (as deprivation increases, how much does social housing increase), and how variable or 'noisy' that relationship is. If there were a perfect relationship between deprivation and social housing provision, all the triangles (which reflect actual social housing provision) would sit neatly on the line. Instead, some triangles are above the line, as the analysis has determined that these zones have more social housing than expected, at this level of deprivation; some triangles are below the line, as the analysis has determined that these zones have less social housing than expected.

- 1) Each black triangle represents a Super Data Zone, somewhere in Northern Ireland.
- 2) The location of each triangle along the x/horizontal axis shows how deprived that Super Data Zone is. Triangles to the left of the 0.0 mark are less deprived than average. Triangles to the right of the 0.0 are more deprived than average. So the triangle with the blue circle around it, representing the SDZ 'Derg H' in Derry and Strabane is about 8% more deprived than average.
- 3) The location of each triangle on the y/vertical axis, reflects the proportion of social homes in that SDZ. So a triangle sitting at 0.25 means that 25% or a quarter of homes in that area are social homes. Returning to our example of Derg H, we can see that it sits at about 0.04, meaning 4% of homes in that area are social homes.
- 4) The purple line in the graph, 'driven' through the spread of SDZs/ triangles is a 'line of best fit'. It's the best guess we can make using the data we have as to the proportion of social housing we could expect in a Super Data Zone, based on how deprived it is. So for example, according to the line of best fit, an SDZ which was around 25% more deprived than average should have around 50-55% social homes.

And clearly from the distribution of triangles/SDZs in the graph, it's not perfect. Some triangles/SDZs/actual social housing provision points are **above the purple, best fit line**. This means that there is more social housing *in these SDZ* than we would expect, based on the deprivation measure used here. However, some triangles are **below the purple, best fit line**. This means that there is less social housing provision *in these SDZs* than we would expect, based on the deprivation measure used here.

For example, take a look at the three triangles in the red circle. These represent 'Lurgan L' in Armagh, 'Blackmountain C' in Belfast and 'The Moor C' in Derry. Despite having high levels of deprivation (almost a third higher than average), they have lower than expected levels of social housing.

So, what's the take home message thus far? Answer: **across Northern Ireland as a whole deprivation and social housing are positively related. To some extent, state provision of social**

housing is in proportion to need. However, there is a significant amount of variability, in the many triangles/SDZs that fall above the purple line of best fit, and the many that fall below. Is this variability simply random? The luck of the draw? Or, through difficulties in housing governance or other factors, have some geographical areas benefited more, others less? To help answer this question we look more closely first at local council areas and then at District Electoral areas.

A focus on Local Government Districts

We've repeated the analysis above at local council level. Figure 2 shows the 'lines of best fit' for each of the 11 Council areas. In each area, as deprivation levels in SDZs increase, social housing increases. And the rate, overall, is relatively similar.

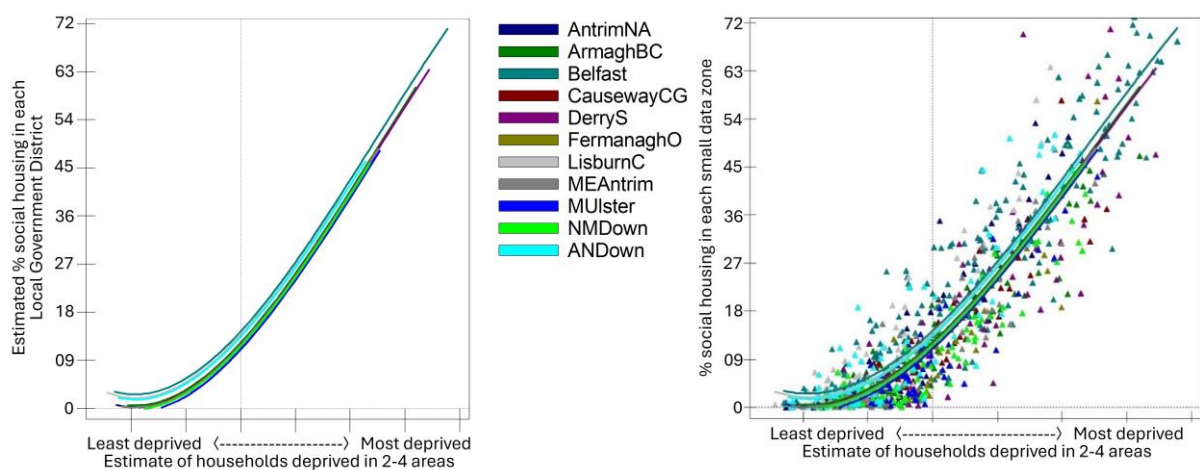


Figure 2: The relationship between deprivation and both actual (the triangles) and estimated (making up the lines of best fit) social housing provision in Local Government Districts.

Each triangle in the graph on the right, which corresponds to a small data zone, has been plotted using two details: the % of deprived households in that zone and the % of social homes in that zone. The lines of different shades, both left and right help to give a sense of the gradient underpinning the relationship between deprivation and social housing (as deprivation increases, how much does social housing increase), and how variable or 'noisy' that relationship is, in each Local Government District. The gradient is similar across Local Government Districts, suggesting that, at this level of governance, social housing provision increases with growing deprivation at the same rate.

However, there are some differences in social housing provision between local council areas. To help see it better, see Figure 3 below. The black triangles in this graph show the average level of social housing provision relative to deprivation in each local council area. As you can see, this is much higher in Ards and North Down, Lisburn and Belfast, at the right hand of the graph.

The vertical lines cutting through each triangle show the range in social housing provision relative to deprivation in each area. The range in Fermanagh & Omagh and Mid Ulster on the

left of the graph does not overlap at all with Belfast. This means that Belfast (on the right-hand side) has more social housing than would be predicted, based on this minimal measure of deprivation, than Fermanagh & Omagh and Mid Ulster (on the left-hand side). The overall difference at the local council level is small though; however, as we shall see, differences are greater at District Electoral Area level.

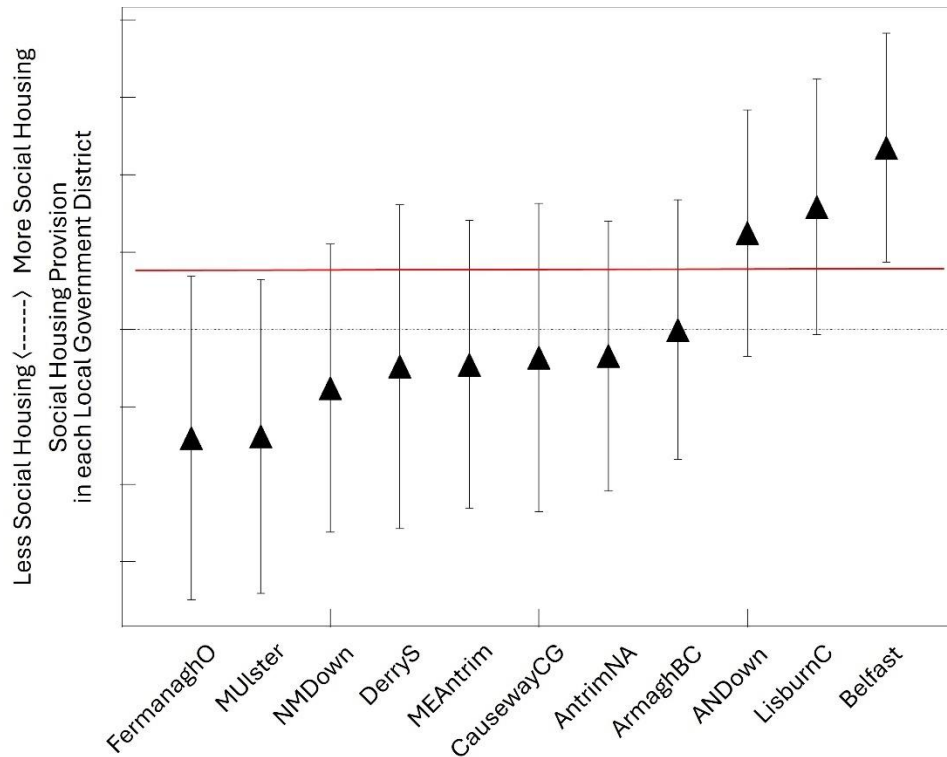


Figure 3: Residual differences in social housing provision across Local Government Districts/intercept difference, from left to right: Fermanagh & Omagh, Mid Ulster, Newry, Mourne, & Down, Derry & Strabane, Mid & East Antrim, Causeway Coast & Glens, Antrim & Newtownabbey, Armagh, Banbridge, Craigavon, Ards & North Down, Lisburn & Castlereagh, Belfast

Figures 1 and 2 emphasises the strength of the relationship between increasing levels of deprivation and social housing provision. Remember that the relationship was imprecise? Some zones had more social housing than was estimated, some less? Figure 3 is showing that Belfast (though note that Lisburn & Castlereagh and Ards & North Down overlap with Belfast) has more social housing than would be expected, purely based on the deprivation measure we are using, compared to Fermanagh & Omagh and Mid Ulster. Less overlap in the whiskers/error bars across Local Government Districts implies differences in the levels of social housing provision, beyond that which can be accounted for by our limited deprivation measure.

A focus on District Electoral Areas

District Electoral areas are larger than Super Data Zones but smaller than local government/council boundaries. There are 80 in total. We've already seen that comparing rates of social housing relative to deprivation at council level shows a consistent overall pattern with a few differences. **But what about within local council areas?** Are there some DEAs that have less social housing provision than would be expected, based on our limited deprivation measure, and some DEAs more? If there are DEA differences in the relationship between social housing provision and deprivation, it would indicate that housing provision is not being planned in proportion to need.

Just like before, in Figure 4 we've mapped out SDZs as triangles, only this time they are colour coded according to which of the 80 District Electoral areas they belong to. And just like before, we've drawn our line of best fit for each DEA.

While there is a positive relationship in each DEA, suggesting that social housing provision is somewhat in proportion to need, **the relationship between deprivation and social housing provision differs significantly between DEAs, rather than being uniform.**

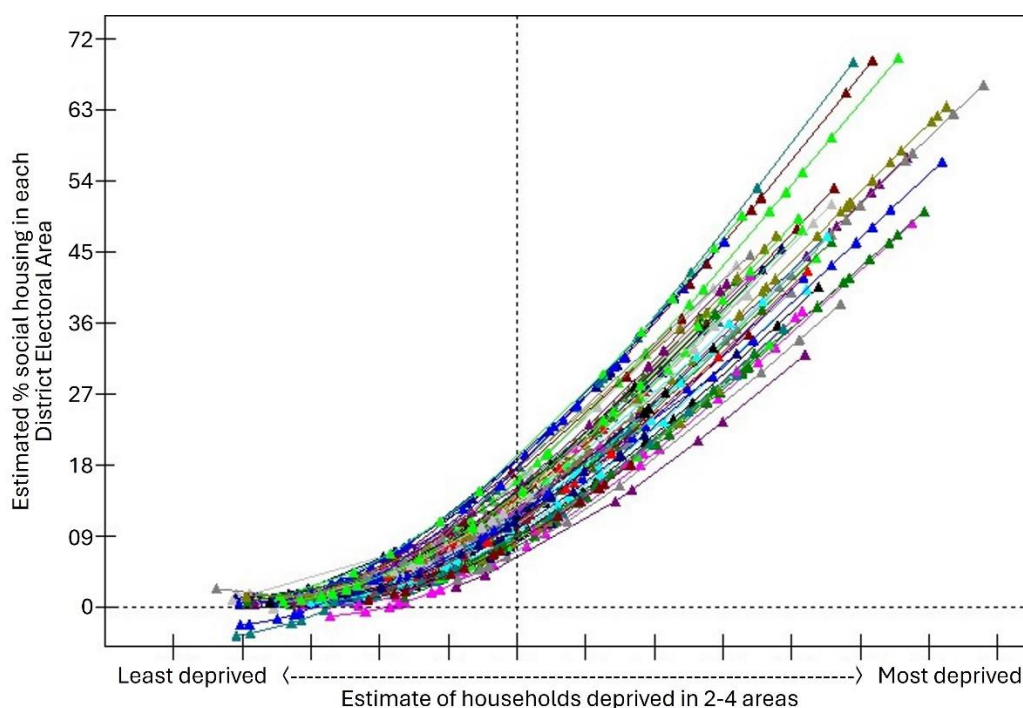


Figure 4: The relationship between deprivation and social housing provision in District Electoral Areas.

Figures 1 and 2 emphasised the strength of the relationship between increasing levels of deprivation and social housing provision. In Figure 4, we are looking at this same relationship, but now for each of the 80 District Electoral Areas. Each triangle corresponds to a super data zone, plotted using two details: the estimated % of deprived households in that zone and the estimated % of social homes in that zone. These estimated %s are as close to reality as possible; they have been adjusted slightly to allow us to draw a line connecting all zones. If

you look back at Figures 1 and 2, you will see that the relationship between increasing deprivation and social housing provision is imprecise/noisy. Reducing the noise, by using estimates of deprivation and social housing provision, that are as close as possible to reality, allows us to fit these lines, and then we can use the gradients to make a meaningful inference about the relationship between deprivation and social housing provision. The meaningful inference we can make here is that there is a steeper relationship between increasing deprivation and social housing provision in some District Electoral Areas. In some areas, more social homes have been made available in response to increasing deprivation. In contrast, there is a shallower relationship between increasing deprivation and social housing provision in other District Electoral Areas. In these areas, fewer social homes are available as deprivation increases.

If we zoom in on higher levels of deprivation- a bit like taking a close up snapshot of the top right parts of Figure 4, we can see that some SDZs in some DEAs have more social housing than other DEAs with comparable levels of deprivation (see Figure 5). And this is a key point: if social housing provision was being planned in proportion to need, all SDZs experiencing a similar level of deprivation would have a similar level of social housing. But in reality, **some SDZs and DEAs have more social housing at a given level of deprivation, some less**—indicating that housing is not being planned in proportion to need.

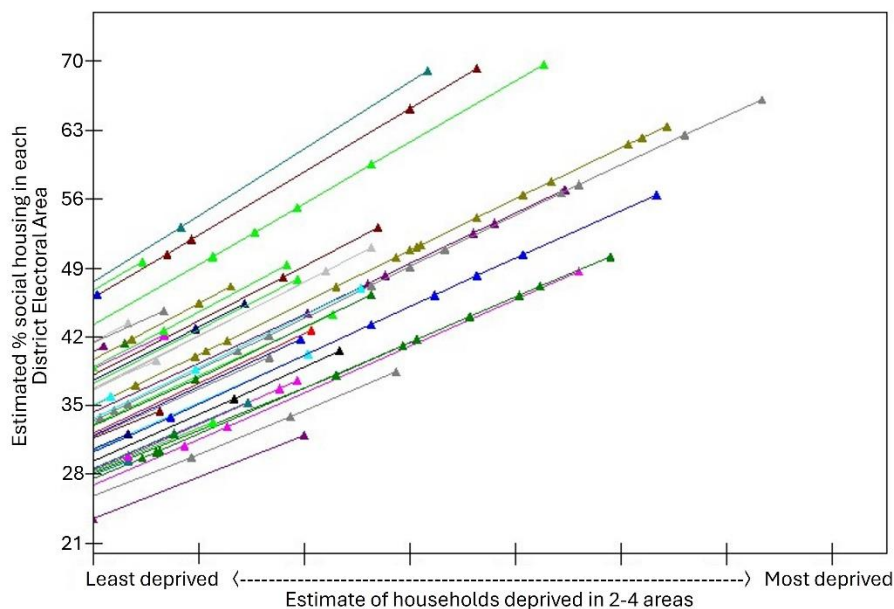


Figure 5: The relationship between higher levels of deprivation and social housing provision in District Electoral Areas.

This graph is drawing on exactly the same analysis as in Figure 4, but now we are ‘zooming in’ on small data zones with higher levels of deprivation. Each line still represents 1 District Electoral Area. Lines towards the top are indicative of steeper relationships between increasing deprivation and social housing provision: more social housing has been made available as deprivation increases. Lines towards the bottom are indicative of shallower relationships between increasing deprivation and social housing provision: fewer social homes have been made available as deprivation increases.

Exploring the differences between District Electoral Areas

Figure 6 below shows the relationship between social housing provision and deprivation in each of the 80 DEAs

We've ranked each of the District Electoral Areas according to their 'line of best fit.' So each triangle shows the predicted level of social housing in a DEA, on average, based on that DEA's level of deprivation. The vertical lines show the range in each DEA, with a small horizontal bar or 'whisker' to show the top and bottom.

The horizontal '0' line reflects the average proportion of social housing we'd expect across DEAs based on their levels of deprivation. So **triangles below the 0-line are DEAs with less social housing than would be predicted** on the basis of need. **Triangles above the 0-line, are DEAs with more social housing than would be predicted** on the basis of need.

There are some DEAs with ranges or 'whisker' bars that do not overlap, indicative of DEAs that vary significantly from one another, in terms of the extent to which social housing provision is driven by need. So for example, for DEAs 1-15 on the left hand side of the chart, the Super Data Zones with the most social housing in them have a lower proportion of social homes than the Super Data Zones with the least social housing in DEAS 65-80.

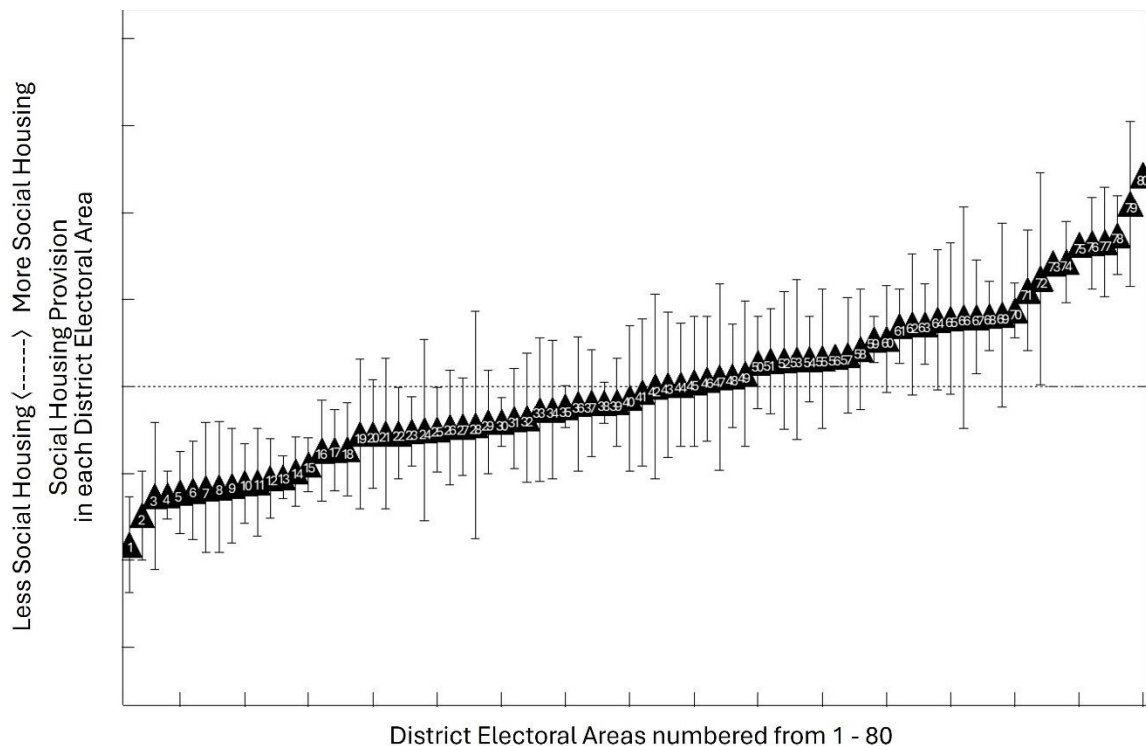


Figure 6: Residual differences in social housing provision across District Electoral Areas/ intercept difference.

Remember that in Figure 3 we showed that Belfast has more social housing than would be expected, purely based on the deprivation measure we are using (with Lisburn & Castlereagh and Ards & North Down overlap with Belfast)? In Figure 6, less overlap in the whiskers/error bars across District Electoral Areas implies differences in the levels of social housing provision, beyond that which can be accounted for by our limited deprivation measure. If we take first

those District Electoral Areas below the horizontal line running through the middle of the graph. These are Areas that have less social housing than we would expect, knowing the levels of deprivation they experience. Now taking those Areas above the horizontal line, these are Areas that have more social housing than we would expect, knowing the levels of deprivation they experience. Areas in the very middle of graph has levels of social housing provision that seem more consistent with what would be expected, based on the deprivation measure used here.

In looking at these graphs and the table, do bear in mind that there is significant variability within DEAs also: some SZAs will sit on, or be very close, to the line of best fit; some SZAs will have more housing than would be predicted within that DEA, some less. Also note that areas significantly differ in the extent to which home ownership is possible, and in their dependence on private renting-patterns.

For those who prefer tables, we have included the named ranked DEAs below, in Table 1.

Table 1: Social housing provision relative to deprivation in District Electoral Areas.

The numbers next to these Areas correspond with their position in Figure 10. Areas with smaller numbers have less social housing than we would expect, based on the deprivation levels they experience. Areas with larger numbers have more social housing than we would expect, based on the deprivation levels they experience. The colours correspond with Local Government Districts: Derry & Strabane, purple; Fermanagh & Omagh, gold; Belfast, teal; Ards & North Down, light blue; Mid Ulster, dark blue; Newry, Mourne, & Down, light green; Causeway Coast & Glens, dark red; Armagh, Banbridge, & Craigavon, dark green; Lisburn & Castlereagh, light grey; Antrim & Newtownabbey, darker blue; Mid & East Antrim, darker grey.

DEAs with the lowest levels of social housing than would be predicted on the basis of the deprivation/need measure used here.	DEAs with somewhat lower levels of social housing than would be predicted on the basis of the deprivation/need measure used here.	DEAs in which social housing provision appears to be in proportion to need.	DEAs with somewhat higher levels of social housing than would be predicted on the basis of the deprivation/need measure used here.	DEAs with the highest levels of social housing than would be predicted on the basis of the deprivation/need measure used here.
1. Derg	17. The Moor	33. Moyala	49. Bangor East & Donaghadee	65. Comber
2. Sperrin	18. Ballymoney	34. Larne Lough	50. Coleraine	66. Downshire West
3. Mid-Tyrone	19. Erne East	35. Old Park	51. Dungannon	67. Three Mile Water
4. Black Mountain	20. Cusher	36. The Glens	52. Bannside	68. Bangor Central
5. Ards Peninsula	21. Carntogher	37. Carrick Castle	53. Ballyclare	69. Downshire East
6. Cookstown	22. Armagh	38. Court	54. Waterside	70. Lisnasharragh
7. Benbradagh	23. Banbridge	39. Ballymena	55. Bann	71. Castlereagh East
8. West Tyrone	24. Erne West	40. Magherafelt	56. Castle	72. Castlereagh South
9. Torrent	25. Craigavon	41. Erne North	57. Braid	73. Titanic
10. The Mournes	26. Crotlieve	42. Dunsilly	58. Knockagh	74. Balmoral
11. Limavady	27. Downpatrick	43. Clogher Vally	59. Newtownards	75. Ormiston
12. Slieve Gullion	28. Killultagh	44. Bangor West	60. Causeway	76. Lisburn South
13. Lurgan	29. Glengormly Urban	45. Faughan	61. Macedon	77. Lisburn North
14. Newry	30. Collin	46. Enniskillen	62. Lagan River	78. Ballyarnett
15. Portadown	31. Omagh	47. Airport	63. Antrim	79. Holywood & Clandyboye
16. Coast Road	32. Slieve Croob	48. Foyleside	64. Rowallane	80. Botanic

What can the census data tell us about social housing provision and deprivation in Belfast?

A quick look at Belfast might incorrectly note that, taken as a whole, it would seem to have towards the higher end of social housing provision relative to deprivation, therefore it should not be prioritised in terms of social housing provision. In reality, sub-areas with low deprivation show high levels of social housing investment, skewing the district average; while in more deprived areas, levels of social housing do not rise to meet need.

In Belfast, we see that there is real variation in levels of deprivation across smaller geographical areas.

The graph below (figure 7) shows that almost 5 in 10 households in the Court area of Belfast are deprived on two measures (eg education and health), compared with 2 in 10 in Balmoral, Lisnasharragh and Ormiston. Broadly speaking the most deprived areas are in the north and west of the city and the least deprived areas are in the south and east. Figure 8 shows the location of these DEAs geographically.

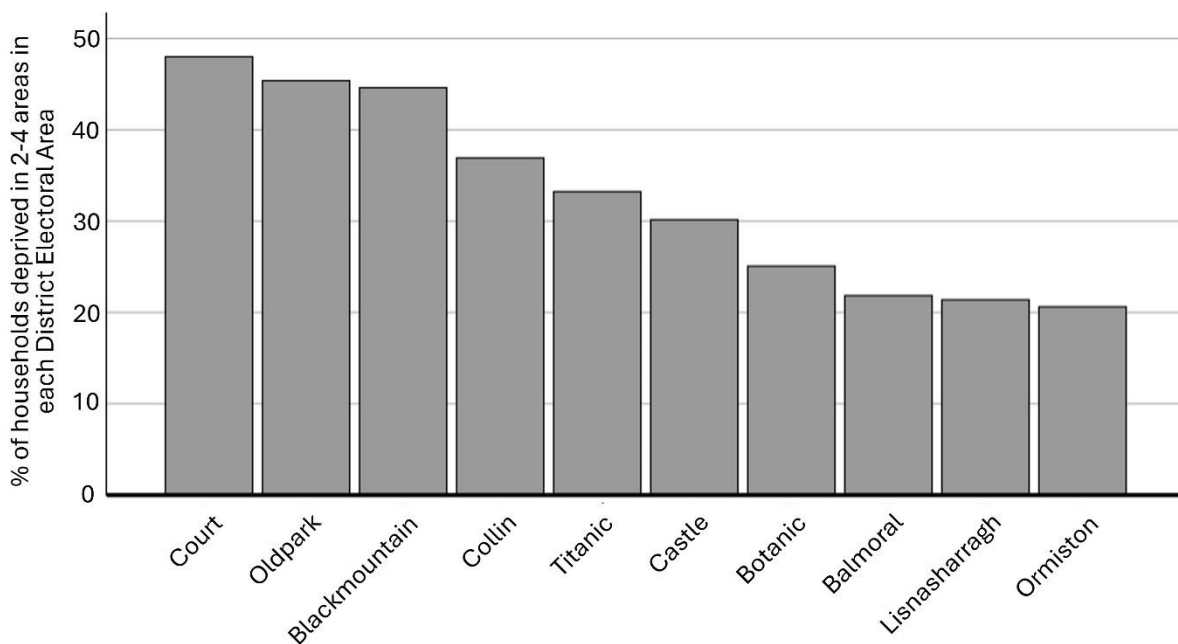


Figure 7: The % of deprived households in each Belfast District Electoral Area.

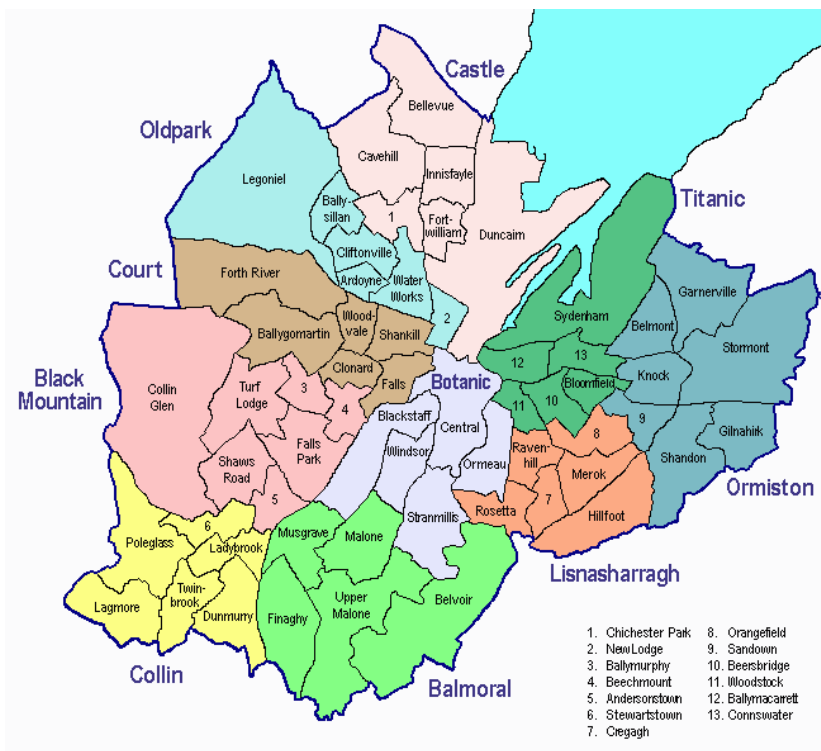


Figure 8- A map of District Electoral Areas in Belfast.

As with Northern Ireland more generally, variation is also found around household tenure (figure 9).

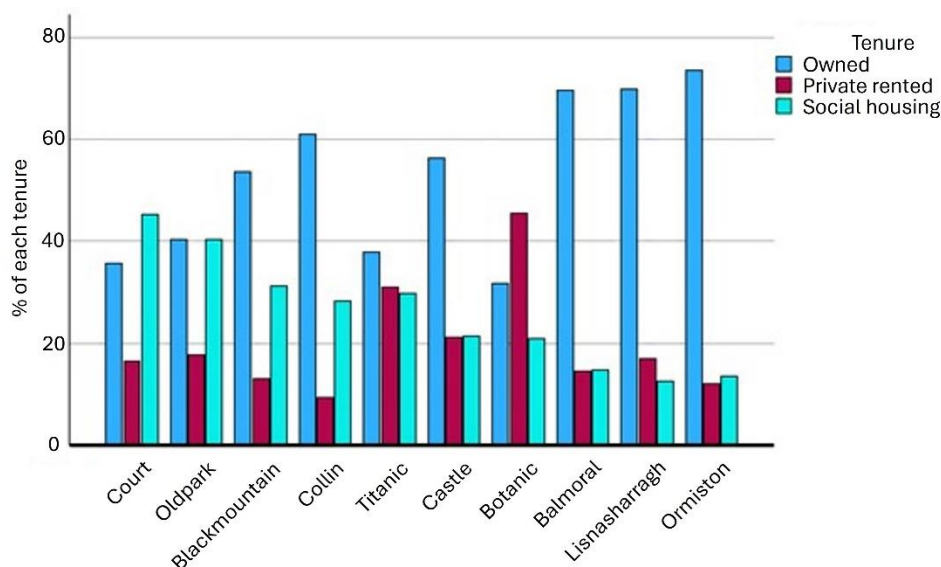


Figure 9: Tenure differences across District Electoral Areas in Belfast

Blue bars correspond with the % of privately owned homes; red bars correspond with the % of privately rented homes; teal bars correspond with the % of socially rented homes.

Figure 10 shows the 'lines of best fit' for each Belfast DEA, and the variability. In each DEA, there is a positive relationship between deprivation and social housing provision: as deprivation increases, the provision of social housing increases. However, there are two

additional points that speak to the key issue of whether social housing provision in Belfast is in proportion to need. It'll be easier to spot these if we zoom in on the high deprivation side of the graph, (note, Balmoral is tucked underneath Ormiston).

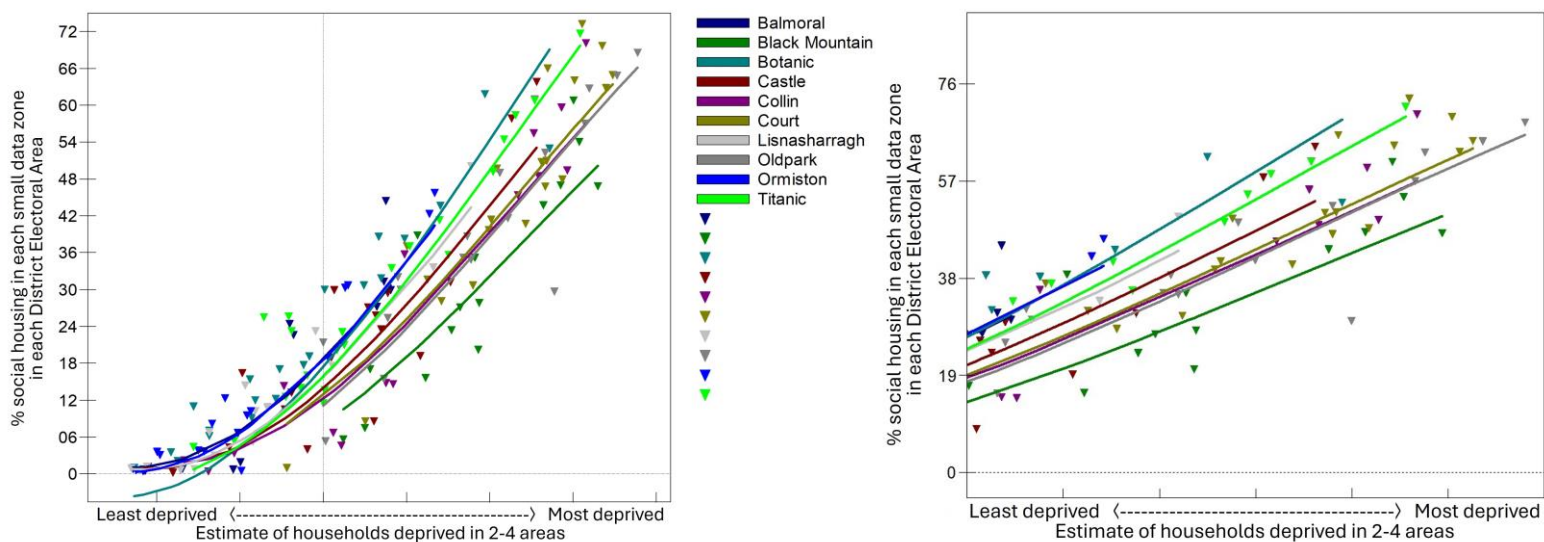


Figure 10: The relationship between deprivation and both actual (the triangles) and estimated (making up the lines of best fit) social housing provision in Belfast District Electoral Areas.

Each triangle in the graph corresponds to a small data zone, plotted using two details: the % of deprived households in that zone and the % of social homes in that zone. The lines of different shades help to give a sense of the gradient underpinning the relationship between deprivation and social housing (as deprivation increases, how much does social housing increase), and how variable or 'noisy' that relationship is, in each District Electoral Area. There is a steeper relationship between increasing deprivation and social housing provision in some District Electoral Areas. In these areas, more social homes have been made available in response to increasing deprivation. In contrast, there is a shallower relationship between increasing deprivation and social housing provision in other District Electoral Areas. In these areas, fewer social homes are available as deprivation increases. The graph on the right is drawing on exactly the same analysis, but now we are 'zooming in' on small data zones with higher levels of deprivation, so that it is easier to see the differences across Areas.

Point 1, while areas of lower deprivation have similar, and comparably low levels of social housing provision, the rate at which social housing becomes available, in the more deprived parts of DEAs, differs. In Balmoral, Botanic, Ormiston, Lisnasharragh and Titanic, social housing provision increases more steeply, as deprivation increases. In Castle, Collin, Court, and Oldpark, the increase is not as steep. In Blackmountain, the increase in social housing provision, as deprivation increases, is at its most shallow. Clearly, some Belfast areas have much higher levels of social housing investment relative to deprivation than others. Black Mountain, despite having high levels of deprivation, has comparatively lower levels of social housing provision than Titanic or Ormiston.

Point 2: Because of the differential relationship between deprivation and housing provision, the reality is that South and East Belfast have higher proportions of social housing, despite comparatively lower levels of deprivation. North and West Belfast have lower proportions,

and the area around the Mackie’s site, see Figure 11, where the Take Back the City coalition is campaigning for more social homes, has almost the lowest of all, see Figure 12.



Figure 11: The small data zones that cover the Mackies site, and its immediate surroundings, in red, other small data zones with Court District Electoral Area are in black.

Where should policy makers target their investment?

It would of course be nonsensical to talk about reducing social housing units in some areas to bring them in line with the average; rather what would be needed would be to raise provision in areas of lower investment to the same level. In this way, using South Belfast as a template, we can figure out how many more social homes would be needed in more deprived areas of Belfast to match its level of social housing investment.

When South Belfast is set as the benchmark for social housing provision relative to deprivation, the area around Mackie’s can be shown to have a deficit of around 386 social homes. This is only a measure of the number needed if we are making provision equitably using South Belfast as our yardstick, and bearing in mind that census definitions of deprivation are themselves limited. The whole of West Belfast by the same token, would need 1595 homes. On this analysis, East Belfast requires fewer homes because it already has a relatively more generous provision of social housing according to its deprivation levels.

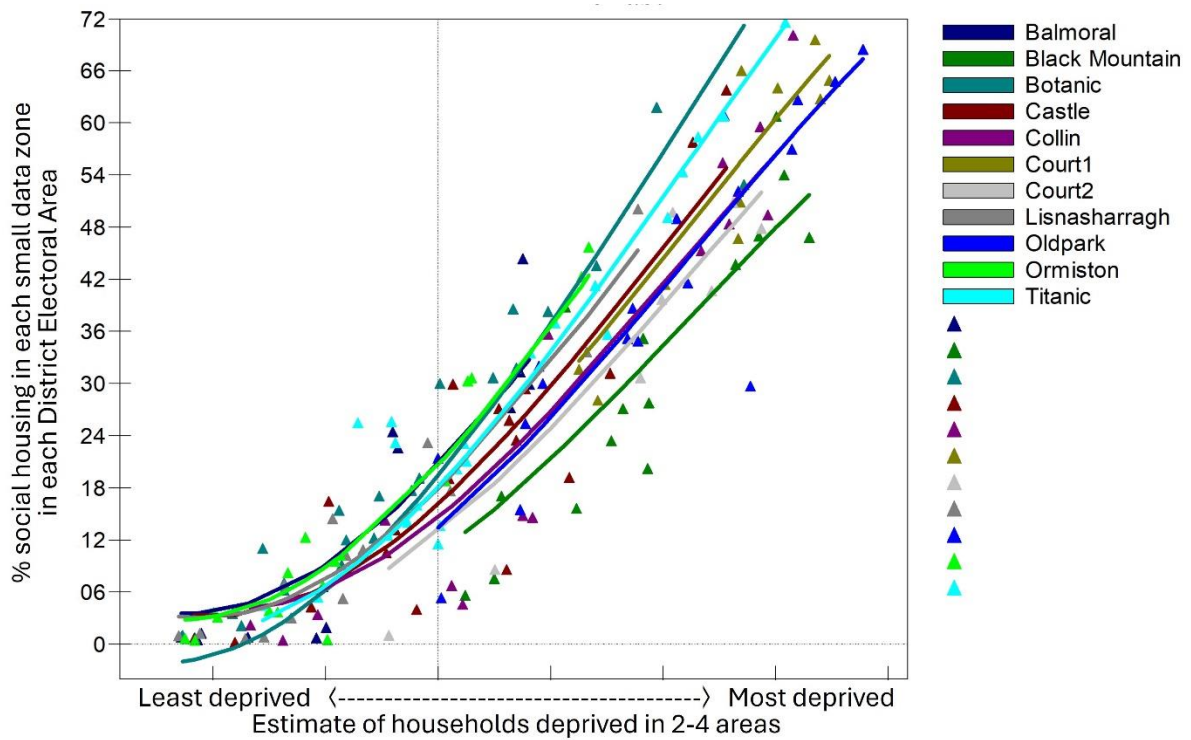


Figure 12: The relationship between deprivation and both actual (the triangles) and estimated (making up the lines of best fit) social housing provision in Belfast District Electoral Areas – now separating between Court 1 and Court 2, with Court 2 including those small data zones that cover the Mackies site and its immediate surroundings.

This is effectively the same as Figure 10. Court 2, the light grey line, has fewer social homes available, as deprivation increases, in contrast to other District Electoral Areas.

Table 2: Number of homes required in areas of Belfast to bring them up to similar levels of investment as South Belfast. In this Table, we multiply the (corrected; see Table 3) surplus proportion of homes in South Belfast, that are unaccounted for in a linear relationship between increasing deprivation and social housing provision, by the number of social homes in each area, generating an indication of the additional homes needed.

A. Area	B. No. of homes needed to enable a similar level of provision to South Belfast
Mackies Zone	~386 homes (0.227 [- 0.046] x 2131 social homes)
North Belfast	~599 homes (0.227 [- 0.163] x 9350 social homes)
East Belfast	~170 homes (0.227 [- 0.208] x 8951 social homes)
West Belfast	~1595 homes (0.227 [- 0.105] x 13068 social homes)
Outside Belfast	~ 6570 homes (0.227 [- 0.143] x 78219 social homes)
Belfast Total	2750

The number of homes needed for each area, in Table 2, is the take home message. Just as technical detail, remember how the triangles in our (SDZs/DEAs) graphs, did not overlap perfectly with the lines of best fit? This is because there is a substantial amount of variability in PRS provision that is unrelated to the measure of deprivation used here. To calculate, then, how different social housing provision is in each area relative to South Belfast, we needed to subtract the proportion of unaccounted for homes *from* the South Belfast proportion, and then multiply the *corrected* proportion by the number of social homes in each area. This then gave an estimate of the number of social homes each area was short, relative to South Belfast, due to a baseline difference in the experience of deprivation.

Table 3: Social housing provision unaccounted for through the limited measure of objective need used here

Area	Proportion of social housing provision unrelated to the deprivation measure, on average	Total number of households living in social housing
Mackies Zone	0.046	2131
North Belfast	0.163	9350
South Belfast	0.227	5709
East Belfast	0.208	8951
West Belfast	0.105	13068
Outside Belfast	0.143	78219

However, it must be remembered that deprivation is not the only marker against which to measure social housing provision – factors like preference also clearly matter, and more social homes should be built in areas of high demand. The impact of tenants’ purchase of their social homes under the House Sales Scheme¹⁸⁵ has also not been factored in; it is possible that before the advent of the scheme, provision more closely matched objective need. However as it stands, it is clear that levels of social housing provision currently do not correspond to measures of objective need – including in the area around the Mackie’s site.

¹⁸⁵ See <https://www.nlb.ie/blog/2024-06-social-housing-shortage-and-the-impact-of-the-house-sales-scheme>