



**Northern Ireland
Assembly**

COMMITTEE FOR SOCIAL DEVELOPMENT

Please use this form to submit written submissions in relation to the Houses in Multiple Occupation (HMO) Bill. Return to committee.socialdevelopment@niassembly.gov.uk by Tuesday 6 October.

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Organisation: Northern Ireland Federation of Housing Associations (NIFHA)

Date: 6th October 2015

Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) represents 23 registered housing associations in Northern Ireland. Collectively our members provide 46,000 homes comprising general needs, specialist and supported accommodation, as well as shared ownership.

Housing associations are not-for-profit social businesses that increasingly borrow significant amounts of private finance to deliver public benefit in meeting housing need, supporting their tenants and investing in communities.

Background

A House in Multiple Occupation (HMO) is currently defined in the Housing (Northern Ireland) Order 1992 as *“a house occupied by more than 2 qualifying persons, being persons who are not all members of the same family.”* This definition includes applicable properties owned and operated by housing associations.

As a result of welfare reforms such as changes to the housing benefit shared accommodation rate, there is an increased demand for HMOs in Northern Ireland. NIFHA recognises that in order to better manage and improve HMO standards, a review of legislation is required. Due to the greater risks with HMOs, in comparison to other rented accommodation, there is a need for greater and more targeted regulation.

General Comments

NIFHA welcomes the opportunity to provide this written response to the Houses in Multiple Occupation Bill, as introduced in Northern Ireland. NIFHA supports the over-arching objectives of the legislation to better regulate HMOs and streamline the definition.

HMOs play an important role in meeting housing demand in Northern Ireland and can provide affordable rented housing for a range of tenants. HMOs owned and operated by the private rented sector tend to provide accommodation for students, migrant workers and single people on a low income.

In contrast, the majority of housing association properties defined as HMOs are used to provide accommodation for people with varying degrees of support and care needs including; homelessness, learning disabilities, mental ill health, and dementia.

This type of housing association property is overseen by various regulatory bodies including the Department for Social Development (DSD), Supporting People and the Regulation and Quality Improvement Authority (RQIA).

We consider the existing definition of HMOs to be too wide-ranging and this causes the regulation of properties where it is not required. This definition does not consider the greater regulatory requirements in which housing associations operate, compared to the private rented sector.

Specific Comments

Schedule 1 of the Bill contains details of properties that will not be classed as HMOs and this includes buildings controlled by registered housing associations. NIFHA

supports this exemption of housing association properties, as it recognises the greater regulatory requirements placed on properties owned and operated by our members.

One of the regulatory frameworks by which housing associations must comply is the Department for Social Development (DSD) Housing Association Guide. Annex C of this guide sets out supported housing design standards including requirements applicable to HMOs.

The design standards currently make reference to the Housing Executive's published Approved Standards for HMOs. The guide requires housing associations providing HMO accommodation to adhere to these standards.

Should any updates to the guide make reference to the new proposed HMO standards, this may have an impact on our members. NIFHA would request that in order to provide clarity for our members, this guidance is updated in consultation with housing associations.

Conclusion

The proposed Bill is welcomed by NIFHA as it recognises the increased regulations in which our members operate. As NIFHA members are required to operate according to the DSD Housing Association Guide, clarity will be needed as to how the new legislation will affect the guide's Supported Housing Design Standards.

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