



# POLICY SUBMISSION

## **Submission on the Review of Housing Management Policy and Practice by the Housing Management Group**

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## 1. Introduction

The Combat Poverty Agency is a statutory body which provides a centre of expertise on anti-poverty policy and practice. A key Agency role is to advise government on all aspects of economic and social planning pertaining to poverty. The review of local authority housing management policy and practice by the Housing Management Group, at the behest of the Minister for Housing and Urban Renewal at the Department of the Environment, Ms Liz McManus TD, falls within this remit. The Agency welcomes the commitment to wide ranging consultation, including the opportunity to make formal submissions on the review.<sup>1</sup>

In the Agency's view, the key factor which should inform this policy and practice review is the recent decision by government to develop an across-the-board national anti-poverty strategy, with the goal of

*mainstreaming anti-poverty action so that all government departments and agencies will target poverty and social exclusion in their policy-making and include the people affected by poverty in this process.*<sup>2</sup>

It is particularly appropriate to consider the poverty implications of the public rented housing sector, given its traditional dominance in social housing provision. Approximately 300,000 dwellings or 30% of the total housing stock has been provided by local authorities. Of this, 90,000 or so remain in local authority ownership - roughly 10% of all private dwellings. In recent years, though social housing provision has become more diversified, the public sector continues to be the main avenue for meeting social housing needs.

Over time, serious problems have emerged in public rented housing due to its increasingly residual role in housing policy. These have had a deleterious impact on the living conditions of households in this sector. As such, the provision of public housing exhibits the perverse pattern recently identified by the Minister for Social Welfare, whereby

*Policies formulated by public bodies in the past have in many instances, inadvertently, created pockets of poverty and we must learn from these mistakes so as not to repeat them. We must abandon the purely sectional outlook and develop the ability to see one's own job and one's own department in the context of a wider reality.*<sup>3</sup>

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<sup>1</sup>The Agency is somewhat disappointed at the composition of the Housing Management Group, which excludes representatives from the voluntary and community sectors. This is out-of-step with current government practice in reviewing policy (eg task force on travellers, Commission on the Family) and specifically undermines the commitment to tenant participation and to partnership with the voluntary sector in the Department of the Environment's policy document on housing: *Social Housing - The Way Ahead*.

<sup>2</sup>Speech by Proinsias de Rossa, Minister for Social Welfare, in Dail Eireann, 22/3/95. This initiative, referred to as the National Anti-Poverty Strategy, is being prepared by the Interdepartmental Policy Committee on Local Development, which includes a representative of the Department of the Environment. See enclosed documentation for more details on the strategy.

<sup>3</sup>Speech by Proinsias de Rossa, TD, Minister for Social Welfare, at conference in Cavan, 24/4/95.

This wider reality is an increasingly divided society, where up to a quarter of the population lives in poverty and are excluded from participation in the social, economic and political activities considered the norm in society.<sup>4</sup> A process of social exclusion pervades all aspects of society, including the housing sector, and represents one of the main challenges facing policy makers in the second half of the 1990s.<sup>5</sup> The Housing Management Group has a potentially vital role to play in addressing a central aspect of this process in regard to the public housing sector, and in thus creating a more inclusive and equitable society.

In making this submission, the Agency has drawn on its considerable knowledge and experience of dealing with public housing areas exhibiting high levels of poverty. It published in 1991 a landmark report on urban poverty prepared by a team of international consultants.<sup>6</sup> The Agency has also been involved in a range of pioneering local initiatives aimed at tackling poverty in public housing areas, such as the Ballymun Task Force, the EU Poverty 3 Programme, the Area Based Strategy to Tackle Long-term Unemployment and the Community Development Programme.<sup>7</sup> The Agency has also drawn on its knowledge of urban policy in Northern Ireland and Europe. The submission has five parts: (i) the links between social exclusion and public rented housing; (ii) general policy issues; (iii) reform of housing management; (iv) provision of housing information and advice; and (v) a possible role for the Agency in assisting with the implementation of a programme of housing management reform.

## **2. Links between social exclusion and public rented housing**

There are four ways by which public rented housing and social exclusion are connected:

First, local authority rented housing caters overwhelmingly for those on the lowest incomes, with around 80 per cent of tenants dependent on social welfare. The residual nature of this sector has worsened dramatically in the late 1980s and early 1990s, due to a combination of housing policy and rising rates of unemployment and poverty.<sup>8</sup> Not alone are tenants financially poor, many are

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<sup>4</sup>Inter-departmental Policy Committee on the national anti-poverty strategy (1995), *Overview Statement on Poverty, Social Exclusion and Inequality in Ireland*.

<sup>5</sup>Combat Poverty Agency (1996), *Sharing the benefits*, submission on the 1996 Budget, Dublin: CPA.

<sup>6</sup>David Donnison *et al* (1991), *Urban poverty, the economy and public policy*, Dublin: CPA.

<sup>7</sup>L Hayes *et al* (1993), *Planning for People: the work of the Ballymun Task Force*, Dublin: Ballymun Task Force and CPA; B Harvey (1994), *Combating Exclusion: lessons from the Third EU Poverty Programme in Ireland 1989-1994*, Dublin: CPA *et al*; S Craig (1994), *Progress through Partnership: final evaluation report on the PESp pilot initiative on long-term unemployment*, Dublin: CPA; and B Cullen (1994), *A Programme in the Making: a review of the Community Development Programme*, Dublin: CPA.

<sup>8</sup>The risk of poverty for local authority tenants in 1987 was 46.8 per cent (as measured by a combined income and deprivation criterion of below 60 per cent of average income and with a basic lifestyle deprivation). This compares with an average poverty risk 16.4 per cent across all households and between 6.3 and 12.6 per cent for owner occupiers. [See B Nolan, C Whelan and J Williams (1994), 'Spatial aspects of poverty and disadvantage', in B Nolan and T Callan (eds), *Poverty and Policy in Ireland*, Dublin: Gill and Macmillan.]

also vulnerable in a social sense - lone parents, the elderly and people with psychiatric needs. The marginalised nature of the public rented sector is aggravated by the physical segregation in tenure types, with a clear spatial demarcation between publicly-owned inner city flat complexes and peripheral housing estates on one hand and private housing estates on the other. For example, in Limerick City, where 84% of tenants are on welfare, two housing estates on the fringes of the city (Southill on the south west and Moyross to the north east) account for half of the 3,200 dwellings rented by Limerick Corporation.

Second, the overall quality of public rented housing is significantly inferior to that in other sectors (owner-occupied and, increasingly, private rented).<sup>9</sup> While this situation is similar to that throughout Europe, the gap in Irish housing standards is exceptional, having 'the most rundown and marginalised public housing estates' in Europe.<sup>10</sup> There are two dimensions to this inferiority in quality: first, the public rented housing stock exhibits many design deficiencies, which are compounded by inadequate maintenance; second, the living conditions in particular estates are problematic, with high levels of crime, vandalism and drug abuse, poor access to public services, weak community structures, widespread public stigma and an unattractive environment.<sup>11</sup>

Third, public rented tenants commonly experience feelings of powerlessness in their relationships with housing management, which is widely seen as being remote from and unresponsive to their needs. This situation reflects in part the administrative and political culture of local authorities, which is paternalistic and clientelist in nature, and in part the organisational capacity of tenants to represent their own interests, due to a lack of resources and a high turnover in potential members.

Finally, aspects of the housing system impact on the financial circumstances of tenants. Research by the Agency and the experience of money advice projects highlight the link between local authority rents and indebtedness.<sup>12</sup> While obviously a multi-faceted issue, the role of the rents system (calculation of rent, collection methods and arrears procedures) in adding to people's indebtedness

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<sup>9</sup>The recent ESRI analysis of social housing need reveals that a quarter of housing applicants would prefer to rent privately rather than from the local authority [T Fahey and D Watson (1995), *An Analysis of Social Housing Need*, Dublin: ESRI]. This negative assessment is even stronger in the SWA-supported private rented sector, according to a soon to be published survey by the Agency of SWA rent supplement recipients.

<sup>10</sup>A Power (1993), *Hovels to High Rise: State Housing in Europe since 1950*, London: Routledge.

<sup>11</sup>The living conditions on local authority estates in Dublin were graphically described in the Lord Mayor's Commission on Housing and, more recently, by Mr Owen Keegan, the Dublin Corporation assistant manager in charge of housing, who referred to the 'terror and distress' of tenants (*The Irish Times*, 25/4/1996)

<sup>12</sup>M Daly and J Walsh (1988), *Moneylending and Low Income Households*, Dublin: Combat Poverty Agency. Also, see B O'Gorman *et al* (1994), *Local Authority Rents and Arrears - policy and practice, proceedings of a conference organised by the National Campaign for the Homeless and Coolock Community Law Centre*, Dublin: National Campaign for the Homeless and Coolock Community Law Centre.

cannot be overlooked. A related issue is the way the rent system can contribute to a poverty traps, whereby an increase in income, whether from welfare or work, is greatly diluted. Another issue that impinges on living standards and is common in the public housing sector is fuel poverty. This arises when a high proportion of a household's income is consumed by inefficient heating systems and inadequate house insulation.<sup>13</sup>

The negative impact of public policy in unwittingly contributing to poverty is clearly exemplified in the public rented housing sector. This sector has in recent years become the most graphic exponent of social segregation and exclusion in Irish society. Living in local authority rented accommodation greatly adds to the degree of social exclusion experienced by an already vulnerable tenantry. Housing's role as a 'gateway' commodity, whereby tenure determines access to crucial life opportunities, has never been more apparent.<sup>14</sup> This context defines the task of the Housing Management Group and cannot be ignored by focusing purely on housing management issues. An effective housing management policy can only occur if the issues of social exclusion and social segregation in public housing are addressed. The next section outline the key policy reforms that are needed to achieve this wider goal.

### **3. General Policy Issues**

This section makes some general policy recommendations as regards the role of the public rented sector in overall housing policy and the regeneration of public housing estates, both of which are critical to the successful reform of housing management policy and practice.

#### **3.1 *A new status for the public rented sector***

The status of public rented housing has been greatly undermined by (i) the prioritisation of home ownership in housing policy, such that renting is a second-best option for those who cannot afford to buy their own home and (ii) the creaming off of higher income tenants (and also the better quality public housing stock) into the private sector through house purchase, surrender grant and, most recently, shared ownership schemes.<sup>15</sup> Added to these is the underfunding of the maintenance of local authority housing, due to the reliance on an inadequate rental income.<sup>16</sup> The combined effects of these policies has been to create a residual housing sector, catering exclusively for those on the lowest incomes in society, and denied the resources to provide an adequate level of service to meet the needs of its vulnerable clientele. Besides making no social sense, the economic logic of the current policy approach can also be questioned. Seeking to have over 80 per cent of households own their home may not be sustainable, either at the level of individual purchasers or in terms of the overall economy, given its consumption of both private and public resources.<sup>17</sup>

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<sup>13</sup>P Quinn (no date), *Energy and Equity: fuel poverty in Ireland*; Dublin: Heat Energy in Tallaght

<sup>14</sup>C O'Connell (1993), 'Housing trends and issues: the role of social housing', *Administration*, 41, 3, 249-261.

<sup>15</sup>T Fahey and D Watson, *op cit*, and C O'Connell, *op cit*.

<sup>16</sup>O Keegan (1993), 'Social housing: the role of housing authorities - the view of the Lord Mayor's Commission on Housing', *Administration*, 41, 3, 276-289

<sup>17</sup>T Fahey and D Watson, *op cit*.

The scope for meaningful reform of public rented housing through improved management is minimal unless underlying housing policy is changed. As a first step, the current subsidisation of home ownership must be reduced, both in terms of direct subsidies and the tax exemption of imputed rents. Second, the sell-off of the best public sector stock should be ended and, third, the funding of public rented housing should be placed on a proper footing, by allowing local authorities to charge economic rents, which would then be subsidised for low income tenants through a housing benefit system.

### 3.2 *A regeneration strategy for public housing estates*

Local authority housing estates contain a majority of welfare-dependent households, mainly the unemployed and lone parents. The resultant levels of poverty mean that tenants are financially unable to contribute to the maintenance of their housing and built environment. Poverty also undermines the economic or social infrastructure in these estates, which is essential if viable communities are to be created and maintained. In addition, poor tenants have a very limited ability to participate in social structures, including housing management, as their confidence and self-esteem is undermined and their access to transport and childcare is curtailed. Finally, the social capital of such estates is constantly devalued as the better resourced tenants leave for more desirable estates, whether public or private.

Government has in recent years recognised the need for targeted programmes which promote economic and social development in disadvantaged urban and rural areas. It is critical that this new initiative is supported by local authorities who have a clear vested interest in its success. To-date, however, the contribution from local authorities to these local development partnerships has been quite limited. Second, more use could be made of physical development programmes such as the various urban renewal schemes and the grants scheme for town and village renewal, to assist with the economic and social regeneration of public housing estates. In this regard, the EU Urban initiative, which centrally involves local authorities and which has a physical component, offers a more positive approach which should be replicated.<sup>18</sup>

## 4. **Housing Management Policy and Practice**

This section looks at three main issues pertaining to housing management: tenant participation in estate management; local delivery of housing services; and improved rent systems.

### 4.1 *Tenant participation in estate management*

The Department of the Environment memorandum on housing management policy in 1993 was a seminal document in its advocacy for tenant participation in estate management. Its implementation requires many changes: in the culture and attitudes of housing administrators and local politicians; in the structures of local authorities and their housing systems; and in the ways housing is financed and delivered. In addition to these, there must be a separate strategy to support tenant involvement in estate management. This is much more than a technical exercise: it involves a fundamental reshaping of traditional tenant-management relations, with a radical shift from the paternalism and dependency that has traditionally characterised this sector. Such

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<sup>18</sup>A useful review of how tenants can be given a central role in estate regeneration is provided in a recent report on the Joseph Rowntree Foundation programme entitled *Action on Estates: M Taylor (1995), Unleashing the potential: bringing residents to the centre of regeneration*, York: Joseph Rowntree Foundation.

tenant empowerment will only occur if a community development approach is adopted, incorporating on the following core principles:<sup>19</sup>

- a focus on the **empowerment** of tenants
  - Tenants have a long experience of official neglect, inadequate resources, low self-esteem and underdeveloped skills to overcome if they are to participate in estate management. Resources and expertise must be provided for tenants and tenant groups in order to strengthen their individual and collective capacity to engage in these new relationships. This should include the local provision of training, access to meeting and other facilities, employment of support workers and technical support.<sup>20</sup> The local level should be complemented by a national-level organisation which offered specialist expertise and promoted best practice in tenant participation.<sup>21</sup> In addition, tenant participation in national policy making should be facilitated.<sup>22</sup>
- an encouragement of **bottom-up** responses
  - It would not be appropriate to impose on tenants a standard model of estate management. The level and form of tenant involvement in any estate should be determined by a dialogue between tenants and landlords and take place at a pace that both sides are happy with. Imposed solutions with pre-determined timescales should be avoided at all costs. Equally, all aspects of housing services, from consultation on estate redesign to control over budgets, should be open for negotiation.
- a promotion of **participatory** democracy
  - It is important that one restrictive form of local democracy - elected public representatives - is not replaced by another - hierarchial tenant organisations. In community development terms, the process a tenant organisation engages in is as important as its size or structure. This may be uncomfortable and inconvenient for housing officials steeped in line management and formal decision-making procedures. Considerable innovation is thus required in the choice of techniques used for engaging with tenants, from questionnaire surveys to focus groups to public open days.
- a commitment to **partnership** between tenants and local authorities

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<sup>19</sup>For more details, see J Smith (1992), *Community Development and Tenant Action*, London: Community Development Foundation and National Coalition for Neighbourhoods.

<sup>20</sup>There are many models for supporting local initiative in the Community Development Programme run by the Department of Social Welfare. These projects could provide a similar role in regard to tenant participation, but would require additional resources for this purpose.

<sup>21</sup>For example, the Northern Ireland Tenants Action Project or the Tenant Participation Advisory Service in the England.

<sup>22</sup>One model here is the Agency-supported national networks of disadvantaged groups (eg the unemployed, rural groups, travellers), to enable them to contribute to government policy making, either through formal structures (eg National Economic and Social Forum) or informal contacts. Another would be to support the revitalisation of the National Association of Tenants Organisations (NATO).

- Meaningful tenant participation should extend to a strategic partnership between tenant groups and local authorities in the management of estates. The Ballymun Task Force provides a unique model for this, based on a structured forum of tenants, officials and politicians jointly responding to the housing needs of Ballymun.<sup>23</sup> The key ingredients for a partnership approach are involving tenants from the outset, negotiating an agreed agenda of action, securing the commitment of partner agencies, developing participative and transparent structures and procedures and dealing in an open way with issues of conflict and power.<sup>24</sup>
- a recognition of the need for an **integrated** response
  - The multi-dimensional nature of social exclusion emphasises the need to go beyond housing alone to embrace related issues such as crime, access to public services, childcare facilities and the quality of the built environment. Wider issues, such as unemployment and educational disadvantage, are also relevant, through the optimum approach here is to link up with the nationwide network of local development partnerships which are now operating in designated areas of disadvantaged.

Tenant participation has the potential to provide substantial long-term benefits to local authorities and tenants, in terms of improved methods of estate management, a rejuvenated community structure and an enhanced quality of life. For this to be realised, tenant participation requires considerable pump-priming at the outset, with adequate resources from central and local government. Hence, the funds already put aside under the housing management grants scheme should be greatly expanded, be provided on a more long-term basis and be directly available to community and voluntary groups. Second, tenant participation is hard work for all concerned, with a special onus on an understandably sceptical tenantry to get involved. A strategic approach to tenant participation, setting out a realistic timescale and expectations, should therefore be developed.

#### 4.2 *Local delivery of housing services*

A key deficiency in current housing management is the centralised delivery of housing services. This gives rise to many problems, such as remoteness from decision-making, inflexibility of provision, lack of coordination, rent arrears and inefficient work practices. A more localised method of service delivery is therefore to be recommended. Localisation of services does not in itself redistribute power, but can make services more accessible and responsive to local needs and enhance relationships between officials and tenants.<sup>25</sup>

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<sup>23</sup>L Hayes *et al*, *op cit*.

<sup>24</sup>For more information on the practice of partnership, see S Craig (1995), *Making Partnership Work: a handbook on involvement in local development partnerships*, Dublin: CPA

<sup>25</sup>A Power and R Turnstall (1995), *Swimming against the Tide*, York: Joseph Rowntree Foundation.



One model of local service delivery is provided by the Priority Estates Project:<sup>26</sup>

The Priority Estates Project model for delivering local housing services
A full-time local office, responsible for repairs, lettings and allocations, rents and benefits, housing advice and empty properties
A local repairs team able to handle emergency, day-to-day and void repairs and planned and cyclical maintenance
Resident caretakers, responsible to a local manager
Tenant consultation and participation in the management and improvement of the estate
An estate budget under the direct control of the estate manager
On-going training for staff and residents
Monitoring of performance
Co-ordination of other services to the estate

Central to localised delivery is a refocusing of services from being systems-oriented to becoming people-centred. As such, the physical change must be accompanied by a change in mindset among the service deliverers. In addition, this new service infrastructure must be supported by the adoption of a community development approach as outlined above. Finally, this proposed local delivery system could also be plugged into by other service providers, thereby minimising set-up costs and creating synergy between agencies. Also, this structure should include devolved decision-making procedures and budgets to local managers.

#### 4.3 *Improved rent systems*

The system of rent calculation and collection is in need of improvement. The design and operation of the current rental system, the differential rent scheme, is at the discretion of the 88 local authorities. The scheme incorporates many inequities, both between areas and across income bands. Also, as it is based on the historical cost of a dwelling, rents may be lowest in high demand areas and highest in low demand areas. The obvious response to this is the introduction of a nationally-uniform differential rents scheme, which would be income related, be based on the replacement cost of a dwelling and seek to minimise the impact on poverty traps.<sup>27</sup> (Ultimately, this scheme could be merged with SWA rent supplements to form a national housing benefit, which would allow local authorities to charge an economic rent.)

<sup>26</sup>M Stewart and M Taylor (1995), *Empowerment and Estate Regeneration - a critical review*, Bristol: The Policy Press.

<sup>27</sup>National Economic and Social Council (1993), *A Strategy for Competitiveness, Growth and Employment*, Dublin: NES.

The methods of collecting local authority rent should be as convenient as possible to tenants. Recently, there has been a move away from direct collection, due to the high costs and security risks involved. It is imperative that this system is replaced by other easy-pay mechanisms, including voluntary direct deduction of rent from welfare payments and local rent offices, as part of the local delivery of housing services.

There is a growing problem of rent arrears in the public housing sector. Some of this could be eliminated with the proposed reforms in the calculation and collection of rent. It is likely, however, that a residual problem will remain, given the poor financial circumstances of the vast majority of tenants. The current framework for dealing with arrears is legalistic, based on the ultimate threat of eviction. This approach is both short-sighted and ineffective: short-sighted in that it fails to recognise the social context of debt, where most people can't pay rather than won't pay and where rent arrears are mixed up with other forms of debt; and ineffective because of the huge costs involved, including providing emergency accommodation for an evicted household. Consequently, a more pro-active approach to arrears, based on early intervention and practical assistance with debt management problems, is recommended. Use of the services of independent money advice projects would be a second avenue of recourse.

## **5. Advice and Information**

The proposal to provide a unified housing advice and information service, managed by local authorities, is a welcome development. Housing provision involves a disparate range of public agencies, including three government departments, the Revenue Commissioners, the local authorities, the health boards (two discrete sections - social work and community welfare). Equally, access to information and advice is critical for the effective delivery of public services.<sup>28</sup> The contribution of the voluntary sector in providing such a service to-date has also to be recognised: housing advice agencies, citizen information centres, unemployed centres and community organisations. These organisations are important providers of public information for a number of reasons: more accessible, impartial nature, ability to follow-up on entitlements and highlighting of anomalies and inconsistencies.

In this regard, the twin-track approach of the Department of Social Welfare has much to commend itself. First, the department has sought to improve its own information service by producing guidelines on all entitlements at a national level and by having accessible local information points, where queries can be discussed and advice provided to potential clients. Second, the department directly supports a network of independent information and advice centres under the National Social Services Board and also funds specialist national organisations, such as Threshold and the Irish National Organisation of the Unemployed. The department also assists with the production of specialist and comprehensive guides. The Department of the Environment and local authorities should follow a similar approach.

<b>Components of an official one-stop-shop housing information and advice service</b>
Information on all aspects of housing, including those which currently do not fall within the remit of local authorities (eg SWA rent and mortgage supplements)

<sup>28</sup>For an elaboration of the conceptual and practical basis for the provision of information and advice in the public services, see report number 6 by the National Economic and Social Forum entitled *Quality Delivery of Social Services*, available from Government Publications.

<p>Accessible (to able and disabled) and attractive premises, with adequate facilities for confidential discussion of queries</p> <p>Provision of free-phone facilities</p> <p>Well-trained staff, who are courteous, considerate and efficient</p> <p>A proactive approach to addressing people's information needs</p> <p>A mechanism for consulting with tenant and other housing groups on the quality of service being provided and on ways to improve service delivery</p> <p>An outreach facility, whereby the service is not confined to a single location, but can be targeted at areas or towards groups with a high level of demand</p> <p>Liaison with other statutory and voluntary information sources, including a referral role where relevant</p> <p>Flexible opening hours and a computerised information screen during closing hours</p> <p>On-going monitoring, with set waiting periods and maximum times for correspondence</p>
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Providing information is not simply a question of providing a room. The service must be properly resourced and, above all, adopt a pro-client approach. There must also be a recognised role for non-governmental bodies in providing housing information and advice, with funding being provided as an integral aspect of any programme for the provision of housing information.

## **6. A Potential Role for the Combat Poverty Agency**

The implementation of the recommendations outlined above will require the contribution of many agencies and organisations in addition to the Department of the Environment and the local authorities. In this regard, the Agency is willing to play a part in the reform process. There are two issues on which it has a specific expertise. The first is in terms of researching the public rented sector and identifying those social, economic and policy issues which are negatively impacting on the living conditions of public rented tenants. The second is with regard to formulating a community development approach to tenant participation in estate management. The Agency, as the designated national resource centre for community development, could advise on appropriate models of good practice and on how to integrate these with existing local structures. The Agency would be willing to discuss these two issues in greater detail with the Housing Management Group and/or the Department of the Environment, if so required.

## **7. Conclusion**

The review of public housing management being undertaken by the Housing Management Group is especially significant in view of the government's proposed national anti-poverty strategy. Public housing is an essential aspect of anti-poverty policy and the current deficiencies in provision must be addressed as a matter of priority. Reform must begin with the residual role of public rented housing in overall housing policy. A more equitable policy across housing tenures and a specific programme for regenerating local authority estates are required to create the proper

climate exist for reforming housing management policy and practice. Three steps are identified: tenant participation in estate management; local delivery of housing services; and an improved rent system. Underlying all these should be a strategy to empower tenants, based on a strategy of community development. Finally, the provision of a comprehensive information and advice service should have two dimensions: improved delivery of statutory information services at national and local levels; and support for independent information services provided by non-governmental agencies.