

PPR Response to “Research to inform a fundamental review of social housing allocations policy” as commissioned by the Department for Social Development

1. Participation and the Practice of Rights (PPR) organisation provide tools and support to marginalised groups actively asserting their right to participate in economic and social decisions which affect their lives. PPRs’ work was recognised by the UN Office of the High Commissioner for Human Rights in 2012 as an example of international best practice in supporting communities to claim rights¹.
2. Since 2006 we have worked to support social housing residents in the north Belfast area, for whom, given the high levels of need and increasing inequality, changes in housing policy are felt most acutely. Religious inequality in housing in north Belfast has been highlighted by the United Nations as concerning twice in the last five years², with the latest report by UN Special Rapporteur on the Right to Adequate Housing, Ms Raquel Rolnik calling on the Executive to take “concerted efforts” to tackle the issue. It is on the basis of this work that we are contributing to this consultation.

Introduction

3. The principle of allocation of housing on the basis of greatest objective need is not only one which is deeply embedded in post civil rights movement Northern Ireland and one which served as a building block for the formation of the Northern Ireland Housing Executive, but it is also rooted in law.
4. The St Andrews Agreement in 2006 reaffirmed the NI Executive’s commitment to the targeting of objective need and successive NI Executive Programme’s for Government; including the current one which re-states this commitment in reference to the approach of the NI Executive;

“The primary objective of these efforts remains the effective targeting of resources towards those in greatest objective need.”³

5. Similarly, Section 75(1) of the Northern Ireland Act 1998 places an obligation on public authorities to have ‘due regard’ to the promotion of equality of opportunity amongst nine named groups. This statutory obligation requires not least that the experiences, needs and inequalities faced by those of different religious belief, political opinion, gender, age, race, marital status, sexual orientation, by those with dependents and those without, by those with disabilities and those without; be made visible and considered in the development of policy – but also that this results in a positive change in outcomes for these groups.

¹ UNOHCHR (2012) “Human Rights Indicators: A guide to Measurement and Implementation” available to view here

<http://www.ohchr.org/EN/NewsEvents/Pages/IndicatorsestablishmentofHR.aspx>

² CESCR, *Concluding observations of the Committee on Economic, Social and Cultural Rights on the Report of the United Kingdom of Great Britain and Northern Ireland* E/C.12/GBR/CO/5 (2009) para 29 and Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and of the right to non-discrimination in this context, specifically Addendum 2: the Mission to the United Kingdom of Great Britain and Northern Ireland A/HRC/25/54/Add.2 (2014)

³ NI Executive (2012) Programme for Government 2011-2015, p.24

6. The obligations of the state in relation to housing are reinforced when viewed through the prism of international human rights law; principally the International Covenant on Economic, Social and Cultural Rights (ICESCR)⁴ in which the right to an adequate standard of living is codified in Article 11. Government obligations in this regard are to ensure that the right to an adequate standard of living, which includes the right to housing, are progressively realised i.e. steps must be taken to ensure continuous improvement.
7. International human rights law, is also very clear that the vulnerable ought to be protected, even in times of resource constraints;

“States parties must give due priority to those social groups living in unfavourable conditions by giving them particular consideration.”⁵

8. Article 2 of ICESCR also provides that the state must undertake to guarantee that the rights enunciated in the Covenant, such as those regarding housing, will be exercised without discrimination of any kind as to race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.

Overriding concerns

Equality

9. PPR have previously noted concerns that the Department’s Housing Strategy for Northern Ireland published in 2012 and entitled “Facing the Future” has not evidenced meaningful consideration of the Section 75 obligations the Department is under, particularly with regards to demonstrating how the proposals will tackle inequality since no Equality Impact Assessment or screening was carried out.⁶ Instead, the Department stated that an incremental approach to equality was to be taken and that as the policies in the strategy are developed, equality screening and where necessary, EQIAs will be carried out.⁷
10. **It is therefore with deepening concern that PPR note the failure to carry out any equality screening on the proposals contained within the research into the review of housing allocations, despite the advancement of this research constituting the development of one of the Housing Strategy’s proposals.**
11. Given the widespread impact and substantive changes being proposed, it is of great importance that consideration is given to the experience of vulnerable groups and that policy proposals are then developed around these groups in line with statutory obligations. PPR’s assessment of the current proposals has shown that there will be

⁴ The International Covenant on Economic, Social and Cultural Rights (“ICESCR”), adopted and opened for signature, ratification, and accession by General Assembly resolution 2200A (XXI) of 16 December 1966, was signed by the United Kingdom on 16th September 1968 and ratified on 20th May 1976

⁵ United Nations Committee on Economic, Social and Cultural Rights, General Comment 4, paragraph 11

⁶ To view a copy of PPR’s response to the “Facing the Future” Housing Strategy consultation, please see <http://www.pprproject.org/content/ppr-express-concerns-over-dsd-housing-strategy>

⁷ Page 51

clear and significant impact on groups protected by section 75; many of whom are already suffering significant inequality.

12. It is notable that the Department's position in this regard, is in clear contravention of the direction proposed by the Equality Commission in the Current Guidelines for Public Authorities which state;

*"Screening...should be completed at the earliest opportunity in the policy development process. For more detailed strategies or policies that are to be put in place, through a series of stages, a public authority should then consider screening at various times during implementation."*⁸

The Guidelines continue;

*"To undertake screening after policy proposals have been developed may be inefficient in terms of time and may be ineffective if policy makers are reticent to make changes at a later stage."*⁹

13. **Similarly, PPR note with concern that a specific proposal within the recommendations, namely the Choice Based Letting (CBL) scheme, has already been progressed with the announcement by the NIHE on 17th December 2013 that a CBL pilot was to go ahead in early January 2014. The CBL pilot scheme was progressed without any equality screening or EQIA having been carried out and prior to the closure of the public consultation on these proposals.**

Participation

14. The Department will be aware that upon the plans to review the allocation system being first announced in the Housing Strategy, PPR sought to influence this process by requesting the terms of reference for the proposed research. PPR subsequently publicly expressed concern¹⁰ about the proposed direction of the review; specifically with regards to the plans to assess how government's functions in relation to assessing and meeting housing 'need' could be delivered within the context of ambiguous policy prerogatives such as "social mobility" and "shared future".¹¹ After the research had been completed, PPR sought to access the reports through a Freedom of Information request, this request was denied by the Department which stated that it viewed commercial considerations as outweighing the public interest in this regard.
15. PPR have noted from the consultee list, that participants in the research are heavily drawn from the housing management sector with minimal scope for meaningful engagement of vulnerable groups who actually access social housing and who therefore stand to be impacted by the review's proposals. PPR view elements of both the content and tone of the research, which are highlighted throughout this response, as reflective of this deficit. As the Department progresses this review, it would be advisable for further

⁸ P.51-52 ECNI Guidance

⁹ P.52 ECNI Guidance

¹⁰ Please see Chapter 8: Housing Need of PPR (2013) "Equality Can't Wait" report <http://www.pprproject.org/sites/default/files/Equality%20Can%27t%20Wait.pdf>

¹¹ DSD (2012) Specification Schedule – DSD Fundamental review of allocations policy
Project Ref: 9440.

research such as the ‘Human Impact’ which was compiled by north Belfast residents for whom the impact of prolonged periods on the waiting list in inappropriate and poor housing is acutely felt and for whom changes to the allocation process will impact, to be considered.¹²

16. It should further be noted that preparation of a response to the three published review reports, which between them amass to almost 200 pages and include not less than 8 pages of references, 15 data tables and 3 annexes of supplementary information, is particularly time consuming and resource intensive. The Department should thus be aware that the volume and complexity of the reports can act as a barrier to engagement from vulnerable groups such as residents directly impacted by long periods on the waiting list. For many, there will not be the resources nor the time to assess unfamiliar proposals and terminology and weigh these against government obligations in terms of human rights and equality, which are absent from reference.

Specific concerns

Assessment

17. The obligations on the Department vis à vis international human rights obligations, national legislation and NI Executive policy as previously referred to, must direct the assessment and allocation of social housing strictly on the basis of objective need. PPR is aware that the Project Specification for this research instructed an examination of how allocation schemes could address wider government policy, which as the research points out is the position of some local authorities in England. Whilst the research identifies that

“...given the level of shortage of social housing in Northern Ireland we do not feel, at this time, that the prioritisation of housing particular groups who are not in greatest housing need is appropriate. (emphasis added)”¹³

18. PPR is concerned, however, that this proposal is not rejected entirely. Recommendation 16, which is discussed as a longer term vision, states that the introduction of a quota system should be explored after a period of five years for reasons outlined such as *“achieving policy goals such as the creation of sustainable and shared communities”¹⁴*.

19. It is unclear how this recommendation would be compatible with the Department’s equality duties under Section 75 of the Northern Ireland Act 1998 to demonstrate “due regard” to the promotion of equality of opportunity and to pursue the lesser legal duty to demonstrate “regard” to the promotion of good relations in a manner which is “without prejudice to” the duty to promote equality. **PPR recommend that the Department review this proposal in light of their Section 75 duties.**

Banded system

¹² Please see the “Human Impact: Residents Tell Their Stories” available here <http://www.pprproject.org/sites/default/files/THE%20HUMAN%20IMPACT%20reduced%20file%20size.pdf>

¹³ Final Report: Conclusions and Recommendations “Research to inform a fundamental review of social housing allocations policy” (December 2013) p.28

¹⁴ Ibid., p.71

20. The research recommends the introduction of a banded system whereby applicants with broadly similar levels of housing need are put into a band and are ranked according to need. It is further recommended that a date order system be used to prioritise applicants within bands. PPR are concerned that a key rationale for these proposals is the ability of banded, date ranked systems to eliminate *“points-chasing”* whereby applicants *“chase points”* in order to increase their priority for housing, and in some cases overtake or *“queue jump”* those already on the list.¹⁵
21. PPR’s experience of supporting residents in housing need in north Belfast has been that many people are seeking to have their housing situation accurately recorded by housing authorities and that they challenge assessments which do not reflect the urgency of their housing need. **PPR view the use of terminology relating to *“points-chasers”* as unhelpful and as contributing to the stigma facing those in housing need. Whilst this may be the opinion of some stakeholders, it is inappropriate that this becomes the Department’s view or that public policy positions are taken on this basis.**
22. Our work with residents has identified that when people seek to improve their housing situations through the practice of rights, such as by requesting their housing file under Data Protection legislation (a request which incurs a £10 charge) they often find gaps or inaccuracies in their assessments. It is only when residents challenge their points allocation and articulate their needs on the basis of rights that many are awarded the points they were originally entitled to. This process often takes considerable time yet it is a legitimate assertion of people’s right to appeal and seek remedies for inaccurate housing assessments.
23. PPR is similarly concerned with the proposal that a date order system should be used to prioritise applicants within bands¹⁶ since it is unclear as to how this delay will impact an applicant from being housed who is moved from one band to the next, if applicants are ranked by date. **PPR request that the Department ensure adequate safeguards are put in place to ensure that applicants’ needs are recorded accurately and that mechanisms to appeal such decisions are put in place and enacted efficiently and effectively**
24. PPR is further concerned that any banded system in and of itself may not accurately reflect objective levels of need. The Tower Hamlets banded system used as an example of an operating banding system shows that applicants with *“priority medical”* defined as *“serious health problems that is severely affected by housing circumstances”* are placed in Group B whilst *“under occupiers”* defined as *“social housing tenants who want to move to a smaller property. Those giving up the most bedrooms are considered first”*¹⁷ are placed above them in Group A.
25. PPR would stress that the Department are required to ensure that any banded system developed in Northern Ireland ensures that policy prerogatives such as the delivery of policies regarding under-occupation do not take precedence over objective need such as serious health conditions affecting housing circumstances.

Transfer-led allocations for new builds

¹⁵ Ibid., p.33

¹⁶ Ibid., p.32

¹⁷ Ibid., Table 1: Tower Hamlets banded system, p.29

26. PPR has particular concerns regarding the proposal that a transfer led system of allocating new build properties is put in place. The proposal details the creation of a “vacancy chain” which would initially allocate the new build property to an existing transfer wishing to move which would then open up a vacancy in their current property, which would then in turn be offered to a waiting list applicant and so on. The recommendation proposes to “*give some tenants the opportunity for re-housing that they may otherwise not have had*”¹⁸ particularly those that “*may never receive an offer due to the high volume of applicants on the waiting list*”.¹⁹ The recommendation also proposes that this system “*offers a means of rewarding tenants who have a clear rent account and do not have a history of being involved in anti-social behaviour*”.²⁰
27. Firstly, this proposal, in allowing the prioritisation of tenants with potentially ‘less need’ to be allocated new homes over those who, for example, are currently homeless, represents a clear deviation from the principles of allocation on the basis of need and a prioritisation of housing management prerogatives over the targeting of objective need.
28. Secondly, the concept of ‘rewarding tenants’ with the allocation of a new build property is incompatible with a recognition by government that the fulfilment of the right to an adequate standard of living (which includes the provision of social housing for those in need) is an international human rights obligation on the state.²¹ New build social housing should be built and allocated to meet greatest objective need, with special consideration for vulnerable groups.
29. Thirdly, it is unclear from the proposals as to how this recommendation could actually work in practice and to what extent there would be an impact on the provision of wider services, also based on need, such as the decisions about where to build new homes.
30. Currently, the calculation of where new social homes should be built is administered through the NIHE’s Social Housing Development Programme (SHDP) Strategic Guidelines. PPR have previously expressed serious concerns about the revised methodology, introduced in 2008, which altered how the NIHE calculate geographical distribution of new build social housing.²² If this recommendation was to be put in place it is likely that new build housing in for example the New Lodge area of North Belfast, where there is recognised high demand, could be allocated to an existing tenant from outside of the New Lodge, perhaps from an area of low demand. This would result in the high levels of demand in the New Lodge not being addressed and a vacancy opening up in another area which may not be filled. Potentially this could lead to a scenario whereby decisions being made about directing resources to address need in a specific area do not impact this need. This would have serious consequences for both the NIHE’s ability to plan where to build homes and the ability of new build housing to meet need.

Allocation

A Choice Based Letting System (CBL)

¹⁸ Ibid., p.39

¹⁹ Ibid., p.38

²⁰ Ibid., p.39

²¹ Article 11 of the International Covenant on Economic, Social and Cultural Rights (1966)

²² ‘Equality Can’t Wait’ chapter 6 pps.38-45

31. The proposed 'Choice Based Letting (CBL) System' would operate by instructing housing waiting list applicants to become "*actively involved*" in choosing properties to meet their needs and "*bidding*" for them. The property is then offered to the highest ranked applicant on the waiting list.
32. **It is regrettable however, that despite this recommendation still being at the research stage with the consultation process still ongoing, the NIHE have already announced that they are piloting this system in different areas of Northern Ireland where there are 'normally available homes'**²³. This does not foster confidence in the potential to influence decisions made on this policy by taking part in the current consultation process.
33. The proposals reference research conducted in England which documented the CBL system as successful in changing the "*mindset for many who previously would have only moved within a confined area*".²⁴ It must clearly be recognised at the outset that the particular circumstances of social housing provision in Northern Ireland mean that people's movement within a "*confined area*" is indicative of broader issues rather than merely their "*mindset*".
34. The notion of "*choice*" for many vulnerable people in housing need is illusive and predefined not by their "*mindset*" but by a range of factors. Choice regarding where to live is defined for those in housing need as it is for all people; by factors including proximity to schools, places of employment and family support networks. In certain areas of Northern Ireland, choice is further limited because of the legacy of the conflict here which may mean that applicants face very real threats to safety and have safety concerns with regard to moving into certain areas. As a result of these issues, the expansion of choice for applicants in housing need is not made a reality by the assessment that their current choice is invalid and in need of being "*extended*". In reality applicants in housing need will only have meaningful choices about where to live when government policies regarding the provision of social housing target objective need and tackle inequality as required by law.
35. The CBL system is also proposed as a mechanism to "*empower*" applicants who are viewed as passive in their housing search.²⁵ The efforts made by residents in housing stress in North Belfast with whom PPR works contradicts this view of social housing applicants, many of whom are using data protection legislation, letter writing, the media and other forms of campaigning in their struggle for decent housing. Residents' empowerment is achieved when transparent and accountable structures are put in place to promote meaningful participation; not when restrictive policy decisions which suggest residents are passive and inflexible are taken.

Assisted list

²³ See announcement on NIHE website

http://www.nihe.gov.uk/index/advice/apply_for_a_home/available_properties.htm

²⁴ Final Report: Conclusions and Recommendations "Research to inform a fundamental review of social housing allocations policy" (December 2013) p.45

²⁵ Ibid., p.46

36. The final report's recommendations also include an "*assisted list*"²⁶ of people who may be disadvantaged by Choice Based Letting. This rightly envisages providing support to "*vulnerable*" and "*excluded*" groups who may not understand or be able to engage with the system and therefore be disadvantaged. The use of assisted lists is also proposed as a mechanism to meet "*legislative requirements in relation to, for example, the Disability Discrimination (NI) Order 2006.*"²⁷ Examples of how this could operate in practice include vacancy advertisements being posted to them, 'proxy' bidding systems whereby the applicant can be contacted by the housing provider to notify them of suitable vacancies or a nominated advocate being able to make a bid on an applicant's behalf.²⁸ The Department must be mindful of the need to employ mechanisms to empower and support applicants experiencing disadvantage or vulnerability in making meaningful choices about their housing – not allowing others to make choices for them. Such mechanisms are often best identified by vulnerable groups themselves who will have firsthand knowledge of barriers to their participation in allocation systems.
37. It is however, unclear as to the potential for assisted lists to improve the opportunities of vulnerable or excluded groups who are experiencing inequality and for whom the legislative requirement on government to tackle the disadvantage they experience is contained within Section 75 of the Northern Ireland Act 1998.

Local Letting Policies

38. Local Lettings Policies which would give greater flexibility to housing authorities are recommended to take account of particular local circumstances, such as "*stimulating demand in areas of identified low demand*" and to "*work towards creating sustainable and mixed communities*"²⁹. PPR has previously expressed concern with proposals with a similar aim; namely plans for Housing Led Regeneration in areas with little or no identifiable housing need since such plans represent a dilution of the obligation to use resources to target objective need and tackle inequality³⁰. PPR repeat those concerns in terms of the proposals regarding Local Letting Policies.

Reasonable offers

39. Recommendations 12 and 12a in the final report are proposals regarding a reduction in the number of reasonable offers an applicant can have and the sanction imposed when an applicant refuses two reasonable offers. The sanction proposed is suspension from the list for a period of two years.
40. Firstly, in a system whereby applicants bid for properties it is unclear how a situation whereby applicants refuse offers could occur. Offers are mentioned in the final report recommendations only within the context of special cases of vulnerable or excluded groups on the assisted list who can be made direct offers³¹ or in exceptional

²⁶ Ibid., p.50

²⁷ Ibid.

²⁸ Ibid.

²⁹ Ibid., p.52

³⁰ For further, please see Chapter 8: Housing Need of PPR (2013) "Equality Can't Wait" report <http://www.pprproject.org/sites/default/files/Equality%20Can%27t%20Wait.pdf>

³¹ Ibid., p.50

circumstances.³² In both these circumstances, the people affected will be vulnerable. **PPR request that further information to clarify the context within which these proposals would operate is provided.**

41. Although not detailed in the final report, PPR view the definition of “reasonable offer” which is discussed in Report 1, to be essential to the adjudication of recommendations 12 and 12a.
42. Report 1 entitled *“Current approaches to accessing and allocating social housing in Northern Ireland”*, details the current approach to defining a “reasonable” offer which is contained within Rule 57 of the Housing Selection Scheme. Rule 57 mandates that an officer should consider the size of the accommodation; the suitability of accommodation (area of choice); suitability of features, and; conditions of accommodation (be fit for human habitation and be in reasonable state of repair). Report 1 surmises that *“there was widespread agreement among key stakeholders for retaining the following factors in determining whether an offer is reasonable; meets the assessed needs of the applicant/household; meets the size needs of the applicant/household; lies within area of choice”*.³³ Although the final report makes no recommendation regarding the definition of “reasonable offer”, if the agreement of key stakeholders in Report 1 is followed, a reasonable offer will no longer be assessed against criteria regarding conditions.
43. In PPR’s experience of supporting residents in high levels of housing need, there is a high rate of refusals of offers based on the poor condition of the house being offered. In our experience many residents request that offers are marked as unreasonable because they do not meet this basic criteria regarding conditions and should therefore have never been offered in the first place. Research launched by residents experiencing housing inequality in north Belfast documents this, the Human Impact: Residents Tell Their Stories³⁴ documents Arlene’s experience;

“Despite Housing Executive standards clearly stating that homes should be warm, when Arlene and her family moved into the property she realised she had been allocated a home which had no heating system or access to hot water at all. When Arlene wrote to the Housing Executive in September, she was advised that on inspection her boiler did not meet present heating standards. Despite this she was told that she would have to wait on an asbestos survey to be carried out, and a scheme planned for her area being implemented, until her home would be fitted with a replacement. The Housing Executive informed her that the installation of a new heating system was programmed for early to mid-October. ...Despite the Housing Executive promises to install a new heating system, by November, with temperatures plummeting with the onset of the Winter season, work on the installation of a new heating system had still not begun. ... Despite work still not having started at her old flat to test for asbestos and to fit a new boiler, a family member of Arlene’s who is also on the waiting list, has been offered the property.”

³² Ibid.,p.54

³³ Report 1: Current approaches to accessing and allocating social housing in Northern Ireland (December 2013) p.48

³⁴ Please see the “Human Impact: Residents Tell Their Stories” available here <http://www.pprproject.org/sites/default/files/THE%20HUMAN%20IMPACT%20reduced%20file%20size.pdf>

44. Our experience is diametrically opposed to the experience articulated by some stakeholders in this regard, Report 1 states;

“There was a perception that properties were being refused for reasons such as a lack of ensuite bathroom, or not being a new-build home.”³⁵

45. Many others, out of desperation will accept properties which never should have been offered to them because they were not aware or not able to have previous offers which were unreasonable, recorded as such. PPR has worked, for example, with a resident who was made three offers in the same street in one day; had this resident not had the capacity to have these offers marked as unreasonable because they didn't meet his family's needs, he would have been removed from the list for two years under the proposed new system.
46. **PPR request clarity on the Department's position on any proposed changes to the definition of a reasonable offer and oppose any measures which limit the already restricted choices facing applicants in need of housing, particularly those who are vulnerable or excluded.**

Implementation

Strategic Implementation Allocations Scrutiny Panel

47. PPR note the proposals put forward regarding the Strategic Implementation Allocations Scrutiny Panel (SIASP)³⁶ to oversee the implementation of the recommendations and provide a system of checks and balances. Whilst the proposed skill backgrounds of potential panel members which are listed include equality, the Department must note that equality should be mainstreamed through the development of any allocation policy and not just factored in at the implementation stage.
48. The Strategic Implementation Allocations Scrutiny Panel is also proposed to have a decision making role in terms of approving applications for Local Letting Policies, identifying and reviewing the 'Bands' used within the banded system which is used in the operation of Choice Based Letting and transfers.³⁷ PPR is concerned that a body charged with making policy decisions regarding the implementation of recommendations would have the required independence to also carry out important scrutiny and monitoring functions.

Housing Market Areas

49. The final report recommends that allocations should be monitored using 11 Housing Market Areas; Ballymena, Belfast, Coleraine, Craigavon, Derry/Londonderry, Dungannon, Fermanagh, Mid Ulster, Newry, Omagh and Strabane.³⁸ PPR note that this recommendation is based on both the results of previous reviews such as the Semple

³⁵ Ibid., p.50

³⁶ Final Report: Conclusions and Recommendations “Research to inform a fundamental review of social housing allocations policy” (December 2013) p.59

³⁷ Ibid., p.60-61

³⁸ Ibid.,p.63

Affordability Review and the ongoing review of public administration. It is proposed that the SIASP collect information in each Housing Market Area to

“...assist with identifying housing flows within each area and the type of applicants who are applying (and who were housed)...this will ensure consistency in approach that allocations are being made in accordance with the scheme.”³⁹

50. PPR has previously pointed out how high ‘area level’ figures e.g. figures for Belfast area, mask high levels of inequality at ‘district’ level e.g. figures for North Belfast, particularly regarding waiting times and allocations.⁴⁰ It is essential that information relating to the allocation of social housing is collected and presented in a manner which makes visible levels of inequality to ensure that legal obligations regarding the promotion of equality can be carried out. **PPR question how the monitoring of allocations data at area level can support this objective and request that the Department provide further information regarding this.**

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³⁹ Ibid., p.66

⁴⁰ Please see Chapter 6: Deciding Where to Build: the Social Housing Development Programme Strategic Guidelines PPR (2013) “Equality Can’t Wait” report
<http://www.pprproject.org/sites/default/files/Equality%20Can%27t%20Wait.pdf> p.40