

# Simon Communities of Ireland Submission on Housing for All Strategy

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## Overview of SCI

The Simon Communities support over 18,000 men, women and children. We have 50 years of experience providing homeless, housing and treatment services to people facing the trauma and stress of homelessness. We are a network of independent Communities based in Cork, Dublin, Dundalk, Galway, the Midlands, the Mid West, the North West and the South East, responding to local needs and supported by a National Office in the areas of policy, research and communications. We share common values and ethos in tackling homelessness and, informed by our grassroots services, we campaign for more effective policies and legislation regionally, nationally and at European level. Whatever the issue, Simon's door is always open for as long as we are needed.

## Introduction

The Simon Communities of Ireland welcomes the opportunity to contribute to the development of a new Housing and Homelessness National Strategy to replace Rebuilding Ireland. This new strategy must be ambitious and demonstrate a determination to end long-term homelessness in Ireland over a medium-term period.

Homelessness remains at an unacceptably high level in Ireland. While the numbers of adults and children in emergency accommodation has fallen over the period of the Covid-19 pandemic, there is a real and serious risk that the numbers will begin to increase as Covid-19 emergency measures are lifted. Factors will include the contraction of supply of new housing as a result of construction stoppages, the increased demand for separate accommodation growing amongst households currently in enforced sharing arrangements, and higher unemployment than pre-Covid levels impacting people's ability to pay rent and mortgages. The lifting of the general moratorium on evictions creates the risk that one of the key drivers of family homelessness over the past six years, terminations of tenancies of families living in private rental accommodation, will begin to rise again.

During the pandemic period, the Simon Communities have worked closely with local authorities, the HSE and government agencies across Ireland to ensure that the capacity is there to meet the needs of people experiencing homelessness while adhering to all public health measures. We have also continued our focus on homelessness prevention and assisting people to move on from homelessness. It is important to acknowledge this successful collaboration between state agencies and NGOs during the period. The new Housing for All Strategy should be cognisant of capturing the positive innovations and progress made in tackling homelessness during the pandemic period.

The Government response to Covid-19 has demonstrated what concerted state action in the face of a crisis can achieve. The number of people experiencing homelessness in Ireland was identified as a humanitarian crisis prior to the onset of Covid-19, and the pandemic has shown us what is required in terms of proactive action to bring this long lasting crisis to an end.

In February 2020 there were 10,148 people in emergency accommodation in Ireland. This fell by nearly 19% to 8,238 by February 2021, the first annual fall in homelessness numbers in six years. This Strategy must now take advantage of this progress and continue to drive these numbers down. It must formalise the innovations introduced during the pandemic period, and provide a mechanism for ensuring that they are consistently implemented across the country.

It must be recognised in the Strategy that the progress of the past twelve months has been uneven. The number of families living in homeless emergency accommodation has fallen 42% from 1610 in February 2020 to 935 by February 2021. However, there has been a 7% rise in the number of single adults in homeless emergency accommodation over the period, from 4292 individuals to 4590.

This submission will lay out the recommendations of the Simon Communities of Ireland on what is necessary to ensure that long-term homelessness can be ended for all household types in the coming years.

This submission will be structured under the following areas;

1. Overarching Ambition for the Strategy
2. Homelessness Prevention
3. Provision of Homeless Services
4. Move on from Homelessness and Housing Supply

## 1. Overarching Ambition of the Strategy

### Ending Long-Term Homelessness

It is important that the new Housing and Homelessness National Strategy sets out a clear vision for what our housing system will look like by the end of the strategic period, and where the country will be in terms of the homelessness crisis and access to secure housing for all.

The Strategy should set out a vision for an Ireland in which homelessness is rare and short-term. The Strategy must provide a timeline for achieving this vision, and set out measurable targets and milestones along the way. While good progress was made during the Rebuilding Ireland strategic period, it is important that this new strategy incorporate a clear, measurable outcome of ending the current homelessness crisis. The European Parliament and Portuguese Presidency of the EU has made ending homelessness a priority issue with 2030 set as a target. The Irish government should match that level of ambition and commit to ending long-term homelessness by 2030.

The best international practice example of Finland should be considered when determining the ambitious but achievable timeframes for driving long-term homelessness to functionally zero.<sup>1</sup> 1054 people were considered long-term homeless in Finland in 2020, with long-term homelessness falling from over 3,500 in 2008. Finland is seeking to halve homelessness again in the period 2020-2023 with a three-year cooperation programme.

The housing section of the Programme for Government (PfG) makes a commitment to 'tackle homelessness.' The Housing for All Strategy must show a high level of ambition in the area of homelessness, and put the State on the path to ending long-term homelessness, rather than just "tackle homelessness". Ending homelessness has been the ambition of previous governments, and it is important that this goal is retained as the centrepiece of the national housing strategy, with the necessary corresponding actions.

The PfG states that it is the mission of the Government that 'everyone should have access to good-quality housing to purchase or rent at an affordable price, built to a high standard, and located close to essential services, offering a high quality of life.' The Programme shows a high level of ambition on social and affordable housing, committing the State to taking on 'a fundamental role in enabling the delivery of new homes and ensuring the best use is made of existing stock.' The Simon Communities of Ireland support the view that expanding public housing is the key component necessary to ending homelessness in Ireland.

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<sup>1</sup> [https://www.ara.fi/en-US/Materials/Homelessness\\_reports/Report\\_2021\\_Homelessness\\_in\\_Finland\\_2020\(60242\)](https://www.ara.fi/en-US/Materials/Homelessness_reports/Report_2021_Homelessness_in_Finland_2020(60242))

This new strategy should be developed using the European Typology of Homelessness and Housing Exclusion (ETHOS) which is international best practice.<sup>2</sup> The strategy should ensure that policy is informed by a full understanding of the scale of homelessness and housing exclusion in Ireland, by tackling the causes of hidden homelessness and circumstances where people are living in precarious accommodation.

A comprehensive Strategy must engage an all-of-government approach which identifies individuals or families who are currently experiencing hidden homelessness, or are at risk of homelessness. Preventing homelessness must be a priority across public services, for public servants in education, the care system, the welfare system and the health system, as well as those mostly directly involved in homelessness services in local authorities.

The overall ambition for the new strategy must be shared across government, and ending homelessness must be recognised as one of the great challenges of this era in government, alongside the public health crisis and environmental and climate action.

The Simon Communities of Ireland believe that successfully achieving the vision of this Strategy will require an enabling amendment to the Constitution, to remove barriers for policy-makers and to enable the government to take the necessary steps needed to fulfil the right to housing for our population. It is very welcome that the PfG commits to holding a referendum on housing, and that cabinet members have clearly stated that this referendum will be on a right to housing.

The Constitutional amendment would allow for the Government to respond to the current housing and homelessness crisis in a manner that is fairly balanced against the competing interests of property rights. It will also frame the State's long-term role in housing in Ireland, as a protector of property rights and as a protector of the human right to safe and secure housing.

The Simon Communities of Ireland is an active member of the Home for Good campaign for a right to housing, and supports Home for Good's proposed legal wording for this amendment.<sup>3</sup> The new Housing and Homelessness Strategy should incorporate plans for the referendum on a right to housing. The strategy must have a level of ambition that meets the standard of a progressively realised right to housing in Ireland.

The PfG commits to establishing a Commission on Housing, which will consider matters such as "tenure, standards, sustainability, and quality-of-life issues in the provision of housing." The Commission on Housing's remit must be orientated towards considering long-term reforms of housing policy in Ireland that guarantee a right to housing and bring an end to long-term homelessness.

One area that will require particular attention is the provision and procurement of properties by AHB's to ensure we have an adequate supply of new housing units to address homelessness and housing exclusion.

## **Monitoring, Evaluation and Learning**

Regularly published reporting is a normal part of any strategy and should provide updates on progress in relation to the actions in the report. One of the notable factors in the development of

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<sup>2</sup> <https://www.feantsa.org/download/article-1-33278065727831823087.pdf>

<sup>3</sup> <https://www.homeforgood.ie/resources/>

the homeless crisis in Ireland has been the changing nature of aspects of the crisis and the frontline learning that has emerged.

To meet the challenge that this creates Housing for All needs to be a living document, which can develop and change in response to changes in circumstances of homelessness and housing. For example, family homelessness grew significantly throughout the Rebuilding Ireland strategic period, and that strategy may have required updating to reflect those changing circumstances. As the Housing for All strategy rolls out, challenges in many cases will be appropriately managed at the local level. However ongoing monitoring and evaluation should be in place with consultation and input from service providers and civil society. These consultative processes will allow the Department to develop and enhance the national strategy and its targets and outputs as required.

As an example, the Simon Communities of Ireland has joined with other leading NGO's in the area of homelessness to commission a review of Rebuilding Ireland by international experts, and make recommendations on the pathway forward to end long-term homelessness in Ireland. Initial findings and emerging recommendations from this research could be available to the Department in June 2021, and may be useful in the development of this Strategy.

***Recommendations for Overarching Ambition of Strategy;***

- ***Develop a vision to 'End Long-Term Homelessness', with a defined timeline to end long-term homelessness by 2030***
- ***Ending homelessness is actioned as an All-of-Government priority***
- ***Develop the Strategy in alignment with the measures required to progressively realise a right to housing for the population in Ireland***
- ***Establish in the remit of the Commission on Housing the policy goal to end long-term homelessness and operationalise the right to housing.***
- ***Build into the Strategy an ongoing process of monitoring, evaluation and consultation with key stakeholders to appropriately reflect changes, progress and challenges on the ground.***

## 2. Homelessness Prevention Measures

### 2.1 Introduction to Homelessness Prevention

The Programme for Government states that “Reducing and preventing homelessness is a major priority for the Government. We recognise the particular challenges of homelessness, for families and for individuals.”

The inclusion of homelessness prevention is very welcome, and it should now form a key pillar of the new national housing and homelessness strategy. Homelessness prevention measures will be a key factor in whether the Government can bring an end to long-term homelessness in Ireland.

In February 2020 there were 10,148 people in emergency accommodation in Ireland. This fell by nearly 19% to 8,238 by February 2021, demonstrating that following six consecutive years of increases in homelessness in Ireland, the measures introduced during the pandemic period have altered the trajectory of homelessness in Ireland. During the first public health lockdown, enhanced homelessness prevention measures worked in tandem with increased housing supply to successfully bring down the number of people in emergency accommodation.

New homelessness prevention measures which stopped people becoming homeless in the first place included;

- Moratorium on rent increases
- Moratorium on evictions
- Greater flexibility in relation to housing related social welfare payments
- Enhanced outreach by local authority teams to prevent families becoming homeless by securing alternative accommodation

Increased supply of units to support move on from homelessness services was achieved through capturing properties which came onto the private rental market from the short-term rental market.

In the period, homelessness prevention measures were rapidly introduced. By their nature, the measures were temporary and a response to the public health emergency. Homelessness prevention measures should now be formalised as a key pillar of the new Strategy. Prior to the pandemic period, successive Irish governments had recognised homelessness prevention should play a part in tackling homelessness and prevention has been included in previous strategies.

In 2002, the Irish government published ‘Homeless Preventative Strategy’<sup>4</sup> which had a particular focus on people leaving institutional care, such as the care system or criminal justice system, who were identified as being at high risk of entering homelessness. The strategy sought to take a holistic approach to preventing homelessness by focussing on health needs, education and training in addition to provision of housing for particularly vulnerable individuals.

Prevention measures were included in the 2014 ‘Implementation Plan on the State’s Response to Homelessness’ and ‘Action Plan to Address Homelessness.’ In particular, in response to the high and increasing rate of households entering homelessness from the private rental market, the government introduced the Tenancy Protection Service, provided by Threshold, funded under Section 10 of the Housing Act 1988. This service is particularly dedicated to assisting people to sustain their tenancies.

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<sup>4</sup> [https://www.drugsandalcohol.ie/5588/1/DOHC\\_Homeless\\_preventive\\_strategy.pdf](https://www.drugsandalcohol.ie/5588/1/DOHC_Homeless_preventive_strategy.pdf)

In 2016, the 'Rebuilding Ireland- Action Plan for Housing and Homelessness'<sup>5</sup> government policy included homelessness prevention policies around services for women at risk of domestic violence, young people leaving State care, and increasing rent supplement and Housing Assistance Payment for those at risk of homelessness.

The 2020 prevention policies, i.e. the moratorium on evictions, rent freezes, enhanced outreach and greater flexibility in relation to welfare payments, have been part of a highly effective effort to reduce the numbers of people entering homelessness during the pandemic.

## 2.2 What is Homelessness Prevention?

Homelessness prevention measures are those policies designed to stop homelessness from occurring.<sup>6</sup> Preventing homelessness stops people experiencing homelessness. Prevention measures may operate to keep people in their current accommodation, or they may help people secure new accommodation where a move is necessitated, rather than face homelessness.

Examples of homelessness prevention measures which keep people in their current accommodation include;

- A process which prevents eviction (such as an appeal based on tenancy rights or a new, mediated agreement with a landlord),
- A moratorium on evictions more broadly,
- A moratorium on rent increases,
- A tenancy sustaining measure such as mediation, legal assistance or advice on a landlord/tenant dispute,
- Social welfare assistance to supplement rent and allow a person to meet their rental obligations,
- Education, training, health, mental health or welfare supports to assist a person or household to sustain their tenancy.

Examples of homelessness prevention measures which facilitate and make possible a move to new accommodation and avoid homelessness include;

- Adequate supply of housing, including social and affordable homes,
- Local authority/NGO assistance to help secure a new tenancy for a household,
- Flexibility with/ extensions to notice to quit periods in tenancy law to allow adequate time to secure new accommodation.

Simply put, homelessness prevention services either assist a household to remain in their home, or assist a household to find a new home, and avoid becoming homeless.

A robust homelessness prevention system must be a key part of an effective integrated strategy of tackling homelessness. An effective strategy should also include a rapid rehousing system, so that where homelessness does occur it can be brought to an end quickly for that household.

An adequate supply of affordable and high quality housing is therefore a critical measure in both preventing homelessness when a household is forced to find new accommodation, and also a critical measure in quickly ending homelessness when it does occur. The adequate supply of housing is at the heart of an effective, integrated strategy to address homelessness.

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<sup>5</sup> [https://rebuildingireland.ie/wp-content/uploads/2016/07/Rebuilding-Ireland\\_Action-Plan.pdf](https://rebuildingireland.ie/wp-content/uploads/2016/07/Rebuilding-Ireland_Action-Plan.pdf)

<sup>6</sup> Pleace, Nicholas. (2019). *Preventing Homelessness, A Review of the International Evidence*. Simon Communities of Ireland.

### 2.3 Benefits of Prevention

The primary benefit of homelessness prevention measures is the potential to help an individual or household avoid the trauma, stress and damage that having an experience of homelessness can do to their lives. Prevention is a key way to avoid the serious human cost associated with homelessness. It is established that homelessness presents a risk to people's health, mental health and wellbeing. In children, homelessness has been shown to risk development and impact life chances.

For the State, homelessness prevention measures are also beneficial. The financial costs associated with homelessness are high. Homeless funding from the Department of Housing increased from €45 million in 2013 to €218 million in 2021. The community and voluntary sector continues to contribute significant additional funding to meet the costs of homelessness. Cost effective prevention measures, such as enhanced tenancy protections or increased funding for local authority outreach teams, can have the effect of preserving State resources, by avoiding the need to fund expensive emergency accommodation, or source new, more expensive private rental accommodation for a household.

### 2.4 Effective Homelessness Prevention

In 2019, the Simon Communities of Ireland commissioned research by the Centre for Housing Policy at the University of York to review the international evidence on preventing homelessness.<sup>7</sup>

The Pleace review found three essentials for effective homelessness prevention-

1. Prevention must be part of an integrated homelessness strategy.
2. Effective prevention is both flexible and connected, adapting to peoples' needs by working effectively with other services.
3. Prevention requires a sufficient housing supply in order to work well.

The research indicates that for homelessness prevention to be effective, it needs to be part of a broader, integrated homelessness strategy. Other measures such as homelessness services, Housing First, rapid rehousing must also work in tandem with homelessness prevention to address homelessness. Broader structural infrastructure, both physical and legal, are also needed for prevention policies to operation. On the legal side, strong tenants' rights and protections are necessary to provide a framework in which prevention supports, such as legal advice and assistance, can operate to secure a tenancy.

On the physical side, there simply must be an adequate supply of affordable housing available so that where a person is at risk of entering homelessness, an alternative accommodation option can be sourced. Homelessness prevention will only be effective therefore in the context of a private rental system with adequate protections for renters, and a housing system with adequate supply to meet the housing needs of the population as a whole.

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<sup>7</sup> Pleace, Nicholas. (2019). *Preventing Homelessness, A Review of the International Evidence*. Simon Communities of Ireland.



## 2.5 Types of Prevention Measures

This submission has outlined that homelessness prevention measures should either prevent a household leaving their current home, or find a new home for that household, and has given example of policies that address both those aims.

Prevention policies can also be categorised in terms of the nature of their intervention. The Pleace research<sup>8</sup> indicates that prevention measures can be categorised as;

1. Structural prevention- such as increasing the supply of housing in the market and broader social welfare policies that reduce poverty and social exclusion.
2. Systems prevention- addressing barriers to support from systems and institutions that contribute to the risk of homelessness. This includes policies that seek to identify who may be at particular risk of homelessness, e.g. those leaving institutional care, those at risk of domestic violence etc.
3. Early intervention- policies that help people at actual risk of homelessness, including support services, or targeted welfare supports.
4. Evictions prevention- including legislation, legal aid, advice, mediation and other services.
5. Housing Stability- such as rapidly rehousing those who become homeless, or who are at imminent risk of homelessness.

## 2.6 Key Recommendations for Prevention Measures

The Simon Communities of Ireland believe we must build on the progress made in 2020 on reducing the numbers of people entering homelessness, by introducing the following policies in the area of homelessness prevention;

### 2.6.1 A legislative underpinning and a ring-fenced budget for homelessness prevention work in Local Authorities

A legal underpinning for local authorities to provide homelessness prevention support to individuals should be introduced. An examples of this legislative provision is the Welsh 2014 Homeless Act which sought to put a duty on local authorities to prevent homelessness where possible<sup>9</sup>. Such legislation would seek to formalise and extend and build upon the sound prevention work that local authorities already undertake in Ireland, in partnership with the community and voluntary sector.

For example, the granting of the additional 50% homeless HAP uplift in Dublin is a prevention measure that Dublin local authorities can take where they deem a person to be at risk of homelessness. The latest data from the Department of Housing for Q4 2020<sup>10</sup> show that of the 1,544 families who presented in the Dublin region in 2020, 55% were prevented from having to enter emergency accommodation by way of tenancy created. Without the assistance of their local authority, those families would likely have been forced to enter emergency homeless accommodation.

<sup>8</sup> Pleace, Nicholas. (2019). *Preventing Homelessness, A Review of the International Evidence*. Simon Communities of Ireland.

<sup>9</sup> <https://www.feantsaresearch.org/download/article-4592410342917616893.pdf>

<sup>10</sup> <https://www.gov.ie/en/press-release/8ff02-homeless-quarterly-progress-report-for-quarter-4-monthly-homeless-report-for-december-2020/#:~:text=The%20quarterly%20progress%20report%20shows,from%20homelessness%20have%20been%20achieved.>

To build on this work homeless prevention services must be designed to meet diverse needs of different groups. For example, youth homelessness should form a designated focus of this work, particularly for young people who engage with care services, and those leaving the care system.

Prevention of homelessness means every local authority should have outreach teams to identify and support those at risk of homelessness. This work should be informed by the ETHOS definition of homelessness with a designated funding line. In practice these initiatives could include outreach to communities; for example, through schools and doctors' surgeries, to provide timely advice and information where the pressures that can lead to homelessness may be detected.

***Recommendation:***

***Establish homelessness prevention measures in legislation and dedicate funding to implementation.***

***Develop a public awareness campaign around homeless prevention services and supports, as currently people are presenting to prevention services when they are already at very high risk of imminent homelessness.***

## 2.6.2 Increase Rent Supplement and HAP rates

The Programme for Governments commits to ensuring “that Rent Supplement and Housing Assistance Payment (HAP) levels are adequate to support vulnerable households, while we increase the supply of social housing.”

Due to the ongoing upward trajectory of rents in the private rental market, and the continued chronic lack of supply, rents continue to outstrip the rates of rent supplement and Housing Assistance Payment.

Increases in rates of welfare payments that relate to housing will not fix the problem of the shortage of supply of affordable housing. The State's over-reliance on the private rental sector to provide social and affordable housing has been a key driver of the homelessness crisis. Indeed, this has been recognised in the Programme for Government, with the commitment to “reduce our reliance on the use of HAP for new social housing solutions, as the supply of social and public housing increases.”

The scale of the challenge is exemplified when we look at the growth in numbers in private rental housing supports compared to social housing. The Housing Assistance Payment was initially piloted in 2014. The social housing needs assessment for 2020 showed that 58,802 households are active HAP tenancies.<sup>11</sup> 15,885 new HAP tenancies were created in 2020, while just 5,073 new social houses were built.<sup>12</sup> Nevertheless, in the short-term, until supply of housing is ramped up, increases in housing welfare rates are a crucial homelessness prevention measure, and are necessary to ensure people can find affordable alternative accommodation on the private rental market when they are faced with imminent homelessness.

To meet the Programme for Government commitment, Housing for All must address the disparity between the cost of private rental accommodation and the rates of HAP across the country.

<sup>11</sup> <https://www.gov.ie/en/publication/970ea-summary-of-social-housing-assessments-2020-key-findings/>

<sup>12</sup> <https://www.gov.ie/en/collection/6060e-overall-social-housing-provision/>

The Simon Communities of Ireland regularly conducts analysis of the private rental market, with our Locked Out of the Market research series.<sup>13</sup> This quarterly analysis consistently demonstrates that there is a severe shortage of affordable properties available within affordable prices across the country. This chronic shortage applies to single people, couples, and families with children. Lack of affordable rental accommodation for people in sudden need of finding new accommodation has been a key driver of homelessness in Ireland.

Our research indicates that there are regularly no properties available in different cities and towns across the country within Housing Assistance Payment limits across these household categories. This is particularly the case outside of Dublin, where the discretionary top-up on HAP is limited to 20% increase, rather than the 50% increase permissible in Dublin where an applicant is at risk of homelessness.

The Programme for Government commits ensuring that HAP is set at a level that continues to support vulnerable households. The current HAP rates, including the discretionary top-up of 20%, does not adequately meet the levels of cost associated with private rental accommodation across most of the country. A 50% homeless HAP top-up for areas outside of Dublin would be a welcome reform to increase the options available to vulnerable households at risk of homelessness.

The Simon Communities consistently meet clients who are paying unsustainable large top-ups to their rents on top of their HAP payments in order to avoid homelessness. Simon Communities also are aware of a trend whereby clients often accept inappropriate or inadequate tenancies using Homeless HAP that are not suited to their needs. When their tenancy becomes untenable, clients must source a new property on the decreased budget of mainstream HAP, as it is not possible to move from one Homeless HAP tenancy to another.

Given the severe uncertainty the coming years will bring in light of the ongoing pandemic, flexibility and adaptability in the provision of the Housing Assistance Payment should be core principles of the coming strategy period.

In relation to the current Covid-19 crisis, as a key homelessness prevention measure, the amendments to and flexibility in the rules to qualify for rent supplement made during the Covid-19 crisis need to be retained on a permanent basis. Those in receipt of the Pandemic Unemployment Payment and eligible for rent supplement during the Covid-19 crisis, but who were unaware of their eligibility, should be notified of their eligibility, and enabled to retrospectively claim rent supplement, particularly given the risk of rent arrears accruing during the pandemic period. Those in arrears who have returned to employment (and therefore no longer eligible for rent supplement) should be facilitated to apply for and receive an emergency needs payment in respect of arrears.

#### **Recommendations:**

- ***Adopt a flexible and adaptable approach to provision of Housing Assistance Payments over the coming years, given high levels of uncertainty.***
- ***Conduct regular analysis of availability of affordable accommodation in the private rental market, and, ensure that Housing Assistance Payment rates match the realities of the private rental market.***
- ***Extend the 50% Homeless HAP top up to regions outside of Dublin.***

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<sup>13</sup> <https://www.simon.ie/Publications/Research.aspx>

### 2.6.3 Increase HAP rates for single people

As stated earlier, the downward trend in people in emergency accommodation over the past year has not been uniform, with a 7% growth in the number of single people in homelessness by February 2021 on the previous year, to 4590.

The gender breakdown of adults experiencing homelessness also indicates that fall in homelessness numbers has been primarily due to a fall in family homelessness. There has been an almost 20% fall in the number of female adults experiencing homelessness by the end of 2020, whereas there has been a 1.65% rise in adult male homelessness. These figures would indicate that adult females are more likely to be homeless as part of a family unit, whereas adult males are more likely to be single and homeless.

Both the moratoria on evictions and rent increases, combined with some increased supply in the private rental market, created the conditions for the fall in the numbers of people in emergency accommodation throughout 2020. However, it is striking that the moratoria and increased supply did not lead to an equally distributed fall across different cohorts. In fact, despite increased supply of properties and a softening of rental prices in some areas, single person homelessness continued to increase throughout the year.

The Department of Housing annually publishes the Social Housing Need Assessment, which presents a detailed profile on the size and demographics of those who are eligible and have qualified for social housing, but are currently awaiting placement.

In 2020,<sup>14</sup> 61,880 households qualified for social housing support. By far the biggest category of household on the list awaiting support was single person households. 52% of all households on the list were single individuals, accounting for 32,204 individuals.

The overall housing list fell by nearly 10% from 68,693 in 2019 to 61,880 in 2020. Despite the 10% fall in households on the housing list, there was no equivalent fall for single person households, which remained the same at over 32,000. Therefore, it can be concluded that while progress is being made finding social housing accommodation for larger household sizes, there remains a continued issue in relation to capacity to house single person households, with that group now grouping as a proportion of the overall housing list to over half of all households.

The Locked Out of the Market<sup>15</sup> series consistently demonstrated throughout 2020 that while increases in supply on the private rental market had come about during the pandemic, that supply was primarily within rates that families on HAP could afford, rather than individuals on HAP.

The September 2020 Locked of the Market study showed just 1 property was available across a total of 2,543 properties was available within single person standard HAP rates. A further 44 properties came within standard HAP rates for single people. This compared with 6 properties within standard HAP rates for couples with one child, and 351 properties within discretionary HAP rates for families with one child. 11 properties were available within standard HAP rates for families with two children, and a further 465 properties were available within discretionary HAP rates for couples with two children. This indicates that there was relatively good supply of properties within HAP rates for families, particularly in Dublin where the majority of those properties were located.

The contrast in availability in properties within HAP rates for singles versus families with children may be an important factor in explaining the drop in emergency accommodation numbers for

<sup>14</sup> <https://www.housingagency.ie/sites/default/files/2021-03/SSHA-2020.pdf>

<sup>15</sup> <https://www.simon.ie/Publications/Research.aspx>

families during 2020, while single person homelessness continued to rise. The difference in availability continued to be demonstrated in the December 2020 Locked Out of the Market study.

The December study found that supply on the market had risen again after the dip in the September study, with 3,019 properties available at any price across the 16 study areas in December. There was a significant increase in properties which came within at a HAP rate, up 57% on the September study. It should be noted that 95% of the properties that came within HAP rates were located in Dublin, partially explained by the 50% additional discretionary HAP rate in Dublin.

While supply of properties within HAP rates for singles increased slightly on the September study, it still lagged far behind supply for families. There were just 4 properties available within standard HAP rates for singles, and 95 properties available within discretionary HAP rates for singles, across the 3,019 properties. This compared to a significant 568 properties within standard or discretionary HAP rates for families within one child, and 674 properties within standard or discretionary HAP rates for families with two children during the period. Our Locked Out of the Market data consistently demonstrates that single people are face with the most difficult conditions on the private rental market in terms of supply.

### **Recommendation**

- ***Consider prioritising raising standard HAP rates for single people and households without children across Ireland, given the particularly chronic lack of supply faced by that group, and growing homelessness amongst that cohort.***

#### **2.6.4 Increase protection for renters to ensure that tenants cannot be evicted into homelessness.**

Homelessness is a crisis in this country, and it is a crisis in each person's life who is experiencing homelessness. Evictions are a key driver of homelessness. The termination of tenancies leaves many individuals and families with no feasible housing option and in recent years many have consistently end up in emergency accommodation as a result, sometimes for extended periods.

The moratorium on evictions in 2020 had a clear impact in reducing family homelessness. In 2020, family homelessness fell significantly, falling 42% by February 2021 on February 2020. Statistics from the Department of Housing<sup>16</sup> show that family exits from homelessness into a tenancy in Dublin in 2020 increased 10% on same period in 2019. The driver of the significant fall in family homelessness has been the prevention measures which avoided new families entering homelessness in 2020 to replace those exiting. This is borne out in the data in relation to family homeless presentations in Dublin. During 2020, family presentations in Dublin were down 24% compared to the corresponding period in 2019. The number of families in Dublin entering emergency accommodation fell 32% in 2020 as compared to 2019.

It is clear that for families, the evictions moratorium has been effective in preventing homelessness. With the removal of the evictions moratorium, there is a risk that the welcome downward trend in family homelessness will be reversed. The conditions that led to family homelessness before the pandemic are still with us, i.e. lack of affordable supply on the private rental market, rent increases, lack of security of tenure in circumstances where a landlord wishes to sell or renovate their property. Without strengthened protections for tenants, there is a risk that we will return to the

<sup>16</sup> <https://www.gov.ie/en/publication/3a843-homeless-quarterly-progress-report-for-q4-2020/>

previous trend of approximately 100 families a month entering homelessness, primarily through evictions from private rental accommodation.

It is welcome that the PfG commits to legislating to allow for tenancies of indefinite duration, however further reform of tenancy law is necessary in order to tackle homelessness.

The Simon Communities of Ireland believe that no individual or family should be evicted into homelessness. Tenancy law must be reformed so that a tenancy cannot be terminated if emergency accommodation is the only option available to that tenant. The Covid-19 pandemic has demonstrated that a moratorium on evictions is possible where there is a pressing public need on the basis of a crisis. The homelessness crisis is of equivalent magnitude in the lives of those impacted. A ban on evictions that leads to homelessness is both a necessary and desirable measure to stop homelessness before it starts.

The Simon Communities of Ireland are proposing that tenancy law be reformed so that where a tenant has been served notice to quit, but has failed to secure alternative accommodation, that the local authority may deem that household “at risk of homelessness”. Being categories as “at risk of homelessness” should trigger a three-month extension to the private tenancy notice period, and the local authority should then be mandated to use that three-month period to work closely with that household to secure alternative accommodation, once that three-month notice period extension has ended. This reform of tenancy law would create a new duty on local authorities to rigorously engage with a local household that is at risk of homelessness because of an impending eviction. It also balances the rights of the landlord, through a modest three-month extension period only in the circumstances where the household is at imminent risk of homelessness.

The new Housing for All strategy should also examine informal or non-conventional tenancy arrangements, such as those informal tenancies that are not registered with the RTB and those whose accommodation is linked to their employment (like seasonal agricultural workers.) Such living arrangements are granted much less protection under tenancy law, and can lead to a serious risk of homelessness.

### **Recommendation**

- ***Tenancy law should be reformed to allow a three-month extension of the notice-to-quit period of a private tenant where the local authority has deemed that household at “risk of homelessness”.***
- ***This extension period should trigger intensive work by the local authority to assist the household to find alternative private rental accommodation during the three-month extension period, to avoid entering emergency accommodation and to avoid overstaying their eviction notice.***
- ***Examine tenancy protections for informal and other non-mainstream living arrangements, and what supports are necessary to minimise the risk of homelessness for those living in such arrangements.***

### **2.6.5 Homeless Prevention for Particular Groups**

It is well established that particular groups are at a heightened risk of homelessness for a multitude of interacting factors.

Those at heightened risk of homelessness include those leaving institutional settings, such as the care system, the mental health system or prison system, and those from certain minority groups, such as Travellers, ethnic minorities and people with disabilities.

The Programme for Government recognises this, and makes the very welcome commitment to “ensure that aftercare and transition plans and protocols are developed for vulnerable homeless people or those at risk of homelessness leaving hospital, state care, foster care, prison, or other state settings.”

Housing for All must now set out in detail the substance of this commitment in the PfG. Agencies must be engaged in their role in the relevant aftercare plans, and the necessary relationships between local authorities and relevant agencies should be spelled out in Housing for All. Agencies such as the probation service, the prison service, Tusla, local authorities, the Department of Justice, the Department of Education, the Department of Children, Equality, Disability, Integration and Youth must all be engaged with Housing for All, and have specific actions in relation to aftercare and transition plans which they are responsible for named in the Strategy.

The PfG makes the welcome commitment to develop a National Youth Homelessness Strategy. Housing for All should align closely with the vision of a National Youth Homelessness Strategy.

The Simon Communities of Ireland are members of the Irish Coalition to End Youth Homelessness.<sup>17</sup> We support the policy recommendations of the coalition.

1. Housing First for Youth
2. Prevention and Early Intervention
3. Address Policies that Disadvantage Young People

The PfG makes a very welcome commitment to “ensure that the housing needs of the Traveller Community are met by local authorities and ensure that existing funding is fully drawn down and utilised.”

This is a crucial homelessness prevention measure for the Traveller population. Travellers are disproportionately over-represented amongst those living in emergency accommodation. A report by the ESRI has found that while Travellers make up 1% of the overall population, they make up 9% of the homelessness population.<sup>18</sup>

Housing for All must set out in detail how this commitment will be met. Consideration should be given compliance measures to tackle the persistent underspend by local authorities of their Traveller accommodation budgets.

### **Recommendations**

- ***Include cross-departmental and inter-agency actions in the Strategy in relation to aftercare and transition plans with specific goal of preventing homelessness***
- ***Ensure Housing for All meets the needs of young people at risk of homelessness through establishing Housing First for Youth, early intervention measures and tackling the policies that disadvantage young people.***
- ***Progress the PfG commitment to ensure that Traveller accommodation funding is spent in full by local authorities, as a homelessness prevention measure***

<sup>17</sup> [https://www.endyouthhomelessness.ie/assets/files/pdf/iceyh\\_call\\_for\\_government\\_action.pdf](https://www.endyouthhomelessness.ie/assets/files/pdf/iceyh_call_for_government_action.pdf)

<sup>18</sup> <https://www.ihrec.ie/discrimination-and-inequality-in-housing-in-ireland/>



### 3 Provision of Homeless Services

This section will outline the priority policy areas that Housing for All should pursue over the strategic period in relation to the provision of homeless services.

#### 3.1 Pandemic Period Reforms

The Covid-19 public health restrictions have had a short-term transformative impact on the delivery of homelessness services in Ireland. A move away from congregated, multi-person dormitories to single bed units and own-door accommodation have been critical public health measures to avoid the spread of the virus within services.

Additionally, the move away from congregated settings has had broader positive impacts on outcomes and engagement for people using homelessness services. The Simon Communities of Ireland have undertaken research into the pandemic experience of frontline services, and the lessons to take from the period.<sup>19</sup>

The Programme for Government makes the very welcome commitment to “Move away from dormitory-style accommodation on a long-term basis and aim to provide suitable tenancies.”

The key recommendation of the Simon Communities of Ireland is to endorse a policy approach which moves permanently away from provision of homelessness services in congregated settings, towards own-room and own-door accommodation. The Simon Communities have found that single unit emergency accommodation is crucial to the privacy, dignity, physical and mental wellbeing of people using homeless services. The provision of single room accommodation would also have a significant impact on reducing the number of people who are rough sleeping, particularly those who sleep rough to avoid sharing a room and in doing so don't access specialist support that could help them to move on from homelessness.

During the first lockdown period, homeless services, local authorities and HSE social inclusion teams were required to very rapidly implement public health guidelines in services, particularly around social distancing and reducing the numbers of people sharing accommodation. The primary changes required related to reducing congregated settings in homelessness services, particularly dormitory and multi-person occupancy rooms.

The ability to reduce capacity and move away from congregated settings was facilitated by the prevention measures stemming the flow of people into homelessness, and the increased rental market capacity to move people on from homelessness into the private rental market. These factors, prevention and increased private rental market stock, are external to the provision of homelessness services. Any effort to move away from congregated settings requires a broader plan to strengthen homelessness prevention measures, and increase the supply of long-term housing units.

Within homelessness services themselves, the following measures were put in place, despite serious challenges of practicability and resources;

- Decanting Existing Residents- working in close collaboration with local authorities, homeless services sought to capture increased short-term rental supply in the period to allow for more own-door emergency accommodation.

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<sup>19</sup> <https://www.simon.ie/Portals/1/Simon%20Systems%20Accelerant-%20Report%20on%20Homeless%20Services%20in%20First%20Wave%20Covid%2019.pdf>



- Decreasing Density- reducing the numbers of individuals in shared dormitories and bedrooms also involved the use of hotel rooms and the takeover of private hostels to increasing the capacity of emergency accommodation.
- Isolation and Cocooning Facilities- public health measures required that contingencies be developed whereby emergency accommodation centres had specific spaces allocated for the scenario that a client would test positive for the virus and require isolation. In oversubscribed services finding the space for isolation rooms proved extremely challenging.

### **Cost to Homelessness Services**

- Budget 2020 had allocated €166 million for the cost of providing homelessness services under Section 10 of the Housing Act in 2020.
- Budget 2021 has indicated that the actual spend on homelessness services in 2020 will have been €196 million, due to the impact of Covid-19 public health requirements.
- Budget 2021 announced a €22 million increase in spending on homelessness, bringing the budget to €218 million.

Therefore, it can be surmised that the cost of implementing the public health requirements and capturing short-term rental accommodation for emergency accommodation during the course of 2020 was €30 million. Homeless services are further subsidised by funding from the community and voluntary sector, meaning the true cost of providing homeless services is significantly higher than the state-funded level. Housing for All should commit to retaining this level of funding to maintain the level of physical distancing and single-room occupancy accommodation over the coming strategic period.

### **Benefits of Move Away from Congregated Settings**

The Simon Communities of Ireland has published qualitative research with the School of Applied Social Science in UCC into the experiences of homelessness services during the early pandemic period.<sup>20</sup> Frontline service staff from Simon Communities, as well as local authority and HSE staff, have reported significant successes during the period, which were linked in particular to providing people with own-room or own-door accommodation. The collaboration and partnership across the government, NGOs, charities and other agencies at the onset on the pandemic was critical to ensuring the safety and wellbeing to clients and staff across the sector.

Finding from the research have found that;

- Long-term rough sleepers with complex needs were more likely to accept an offer of own-room or own-door accommodation during the pandemic period than they had been to accept the offer of multi-person dormitory accommodation pre-pandemic.
- In a number of cases this led to very positive outcomes for long-term rough sleepers with complex needs- providing clients with their 'own space' was seen as pivotal in engaging with rough sleepers.
- Fast-tracking of families living in family hubs into social housing occurred with the increased supply of private rental accommodation.

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<sup>20</sup> <https://www.simon.ie/Portals/1/Simon%20Systems%20Accelerant-%20Report%20on%20Homeless%20Services%20in%20First%20Wave%20Covid%2019.pdf>

- The pandemic period raised public awareness of the importance of a home for staying safe. The public messaging of “stay home” to stay safe has cut through in demonstrating the importance of providing people with their own space in order to live secure and safe lives.
- In 2020, there was increased flexibility shown by DRHE in relation to placing couples in placements together who were not formally registered as a couple, which helped to reduce rough sleeping. Continued flexibility and creativity is required from local authorities to move people from the streets to accommodation.
- The local connection criteria was removed as a block to accessing emergency accommodation for people from outside of Dublin which significantly helped with supporting people away from rough sleeping and into accommodation.

Housing for All must capture the progress made in relation to reforms of our homeless services during the pandemic period.

### **Recommendation**

- ***Housing for All should provide a roadmap for the move away from congregated settings in emergency accommodation, to single room occupancy and own-door accommodation for those who become homeless.***
- ***Housing for All should ensure that the reforms brought in during the pandemic period, such as the enhanced collaboration between agencies, ending of the local connection rule and flexibility for couples who are rough sleeping are made permanent.***

## 3.2 Mental Health and Addiction Services

The Simon Communities of Ireland provides a range of mental health related services, and recognises the inter-related nature of mental health and homelessness. Homelessness can be a cause of trauma and serious mental health issues for a person, while mental health issues can also play a factor in an individual becoming homeless, or becoming stuck in a cycle of repeated entry into homelessness. While the increase in homelessness since 2013 was driven by the housing crisis, we must also acknowledge that those who become entrenched in homelessness will usually have experienced a number of traumas in their life. This can often lead to addiction or mental health issues that become increasingly pronounced in homelessness. To address these needs, we require tailored, low threshold alcohol and drugs services, including treatment, detoxification, rehabilitation and aftercare services.

It is therefore very welcome that the Programme for Government commits to meeting the specific mental health of those experiencing homelessness, where it states that “Importantly, Sharing the Vision recognises that many vulnerable groups, including those who are homeless, or who have an intellectual disability or an eating disorder, have specific needs, which our mental health services should be equipped to meet.”

The Simon Communities of Ireland support the Programme for Government’s recognition of the need for homeless specific mental health services, and for the need to expedite the implementation of the national mental health strategy “Sharing the Vision.”

As a strategy, Housing for All must take a holistic view of homelessness, and recognise the role that our health and social services have to play in addressing our homelessness crisis. Housing for All should include specific, measurable actions for the HSE and health and social care providers in

relation to provision of the necessary mental health and addiction supports to those experiencing homelessness. Interagency work between the health and housing agencies should be built into the strategy.

The Programme for Government makes the very welcome commitment to “ensure that the HSE provides a dedicated funding line and resources to deliver the necessary health and mental health supports required to assist homeless people with complex needs.” This action must be named in Housing for All, with HSE buy-in and accountability for that action point in the Strategy over the strategic period.

The PfG also commits to increasing the number of residential beds for those stabilising, detoxing and/or seeking drug-free services. This commitment should be spelled out in Housing for All, with timelines attached. The PfG also makes a welcome commitment to the opening of the pilot medically supervised injecting facility in Dublin City, and to support the roll-out of access to and training in opioid antidotes.

The pandemic period has brought reforms in how opioid and methadone treatment has been dispensed across the country, which has made access easier for individuals. This learning should be captured, and incorporated into Housing for All.

The Simon Communities continue to find that access to services for people with dual-diagnosis is challenging, whereby people are rejected from mental health services due to their substance issues, and rejected from addiction services due to their complex mental health needs. There is an urgent need to develop services specialising in dual-diagnosis and also to provide training and resources for existing services to ensure that substance use is not a barrier for people requiring mental health care.

There is increasing awareness of the prevalence of childhood trauma among the homeless population, but also that homelessness in itself is a trauma. The roll-out of trauma informed care across health and social care services is of huge importance and adequate funding should be allocated for training all staff, particularly in homeless organisations.

In particular, SCI recommends the following services be funded and incorporated into the overall Housing for All strategy for homeless services;

### **Recommendations**

- ***24/7 crisis mental health services tailored to the needs of those experiencing homelessness are critically needed***
- ***Enhanced funding for dedicated addiction services for the homeless population and for those amongst the homeless population who have a dual mental health and addiction diagnosis.***
- ***Align Housing for All with the homelessness-related actions in the national mental health strategy ‘Sharing the Vision’ and the national drugs strategy ‘Reducing Harm, Supporting Recovery.’***

### **3.3 Education and Child Supports**

Widespread family homelessness in Ireland has meant that many thousands of children have experienced the trauma of homelessness. The impact for these children has been captured in a number of reports.<sup>21</sup> The primary policy response as outlined elsewhere in this document should be

<sup>21</sup> <https://www.oco.ie/app/uploads/2019/04/No-Place-Like-Home.pdf>

to work with families in crisis to prevent homelessness in the first instance and to support families to move on from homelessness as quickly as possible.

However, entering homelessness in the first instance can be a traumatic experience for a child. To meet their needs, each child should have access to a child care worker should they require one. There have also been instances of children who have special needs entering homelessness and there should be a needs based discretionary fund to meet their requirements.

It is welcome that the Programme for Governments commits to providing “additional supports for students who are homeless, resident in family hubs, or in direct provision. Further develop access programmes to Higher and Further Education for students from disadvantaged groups, including members of the Traveller Community, those in direct provision, and those who are socio-economically disadvantaged.”

This commitment should be incorporated into Housing for All, with the relevant departments, such as the Department of Education named in the strategy, and accountable over the strategic period.

The Simon Communities of Ireland believe that given the traumatic nature of homelessness for children, every child in homelessness should have access to a child care worker should they require one. Housing for All as a strategy should include actions for Tusla and the Department of Children in relation to provision of child care worker supports.

### **Recommendations**

- ***Housing for All must engage with the relevant education and child related agencies and government departments to ensure those departments are bought into the strategy, and are accountable for actions in relation to improving the education and welfare of homeless children.***

### **3.4 Case Worker Supports**

The Simon Communities are concerned that people in private emergency accommodation (PEAs) do not have the same access to case management, support and expertise as those in supported accommodation. On this basis, we advocate for an increase in the available key-working resources for people who are using PEAs. Support from a skilled and qualified keyworker is an invaluable tool when moving on from homelessness.

Specialised staff in day services who can support people with moving on from homelessness (housing applications, PPS numbers etc.) would greatly benefit people who are not accessing supported accommodation. Local authorities could also offer more flexibility in meeting people where they are, by providing drop-in clinics in day services for example, rather than having a fixed location with specific opening hours.

### **Recommendation**

***Ensure that those in private emergency accommodation have access to the support and expertise of keyworkers to assist in expediting their path out of homelessness.***

## 4 Move on from Homelessness and Housing Supply

### 4.1 Building Social Housing

The Programme for Government has committed to increasing the social housing stock by 50,000 units over the five-year term. The social housing needs assessment for 2020<sup>22</sup> shows that there are 61,880 households assessed as qualified for housing supports. Housing for All must set out ambitious targets social housing to meet this level of need. The Simon Communities of Ireland believe that approximately 15-20,000 new social homes need to be added to the social housing stock each year. Supporting Approved Housing Bodies will play an important role in providing long-term social housing.

A particular focus should be given in the strategy to ensuring that the mix of units matches the evidence base for social housing needs. As identified in the single person prevention measures section of this submission, there is a particularly chronic lack of affordable one and two-bedroom accommodation suitable for single people and small households. Single adults make up 52% of the households on the 2020 social housing needs assessment list, and couples with no children make up a further 8%. Therefore 60% of households on the social housing list are currently competing on the private rental market using inadequate HAP payments for the small number of one-bedroom units that are available.

To achieve the level of one and two-bedroom units required, Local Authorities and Approved Housing Bodies have to be supported to transition away from 'turnkey' procurement and proactively develop one and two-bedroom homes. The Covid-19 economic stimulus has now presented an opportunity to release funds for social and affordable house building on a more ambitious scale.

To date, the State has tackled the escalating need for social housing through welfare payments to individuals to meet the cost of private rental accommodation.<sup>23</sup> In 2020, of the 24,625 new social homes delivered by the government, 60% of these were through the provision of rent supplement of the housing assistance payment. In effect, 60% of social homes are tenancies on the private rental market that the State is supplementing. The overreliance on welfare payments such as HAP to meet social housing need is recognised in the PfG, with the commitment to "reduce our reliance on the use of HAP for new social housing solutions, as the supply of social and public housing increases."

It is welcome that the PfG commits to ensuring "that an appropriate mix of housing design types is provided, including universally designed units, and accommodation for older people and people with disabilities." The PfG further commits the Government to avoiding "over-concentration of particular housing types in areas, by requiring local authorities to complete Housing Need and Demand Assessments to inform the delivery of an appropriate mix of housing typologies to cater for the needs of disparate household types and sizes." Housing for All must ensure that that there is a concerted focus on the provision of one and two bedroom units in the delivery of the social housing programme.

In order to really end long term homelessness, consideration should be given to increasing the allocation of local authority housing to the priority list, to put a greater focus on moving people out of homelessness.

<sup>22</sup> <https://www.gov.ie/en/publication/970ea-summary-of-social-housing-assessments-2020-key-findings/>

<sup>23</sup> <https://www.gov.ie/en/collection/6060e-overall-social-housing-provision/>

The Programme for Government makes a welcome commitment to “continue to expand the Housing First approach, with a focus on the construction and acquisition of one-bed homes and the provision of relevant supporting services.”

The PfG also commits to developing “a cost rental model for the delivery of housing that creates affordability for tenants and a sustainable model for the construction and management of homes. In doing this, we will be informed by international experience of the delivery of cost rental, such as the ‘Vienna Model’.”

Key to this is a clear understanding of affordability. The target should be less than 30% of household income. Current market rents should not be used as a benchmark of affordability.

Both of these specific housing models, Housing First and cost-rental model, are crucial tackling the homelessness crisis. Tangible targets should be put beside both models in Housing for All, so progress can be monitored and tracked in relation to their roll-out. Ireland can be a European leader in terms of its embrace of Housing First, and truly make inroads on the path to ending long-term homelessness for those most vulnerable individuals.

Simon Communities have found that there are many individuals who would benefit from Housing First who do not currently meet its threshold. Increasing the availability of Housing First tenancies would allow for a lower threshold of access, focusing on those that are experiencing the longest periods of homelessness and those that have the most complex needs. In addition, flexibility is required in terms of the use of properties with more than one bedroom for Housing First, given the chronic lack of one bedroom properties is currently a constraint on the expansion of the programme. There is a continued need for long-term supported accommodation in addition to Housing First, and the new strategy should include provision for such long-term supported accommodation.

Increased funding for CAS and CALF has been very welcome, and this should be built into the strategy. Funding should be committed to over the 4-5 year cycle, with annual CAS and CALF budgets available to local authorities and approved housing associations for procurement and building.

In the context of the increased role of Approved Housing Bodies in the provision of social housing, the strategy should commit to a review and update of the guidelines for capital funding models, including the forms and documentation, for AHB projects.

In addition the strategy needs to review procurement processes and ensure that AHB’s have the flexibility required to close sales and advance developments in a timely fashion.

With the expiration of Rebuilding Ireland, this coming strategic planning period provides an opportunity to reset the level of ambition for social housing building in Ireland, and to ramp up support for Housing First and the cost-rental model. In addition, the Simon Communities of Ireland are part of the Housing First Platform, as such we endorse the submission made by the Housing First Platform to this consultation process.

### **Recommendations**

- ***Housing for All should lay out explicit targets for the building of social housing, including the mix of units, and support for Approved Housing Bodies undertaking social housing projects***
- ***The Strategy should lay out explicit targets for the expansion of Housing First, and funding of long-term supported accommodation, CAS and CALF***
- ***The Strategy should lay out explicit targets for the development of the cost rental model of housing provision.***

- ***Consider increasing local authority allocations to the priority list to 50%, putting a particular focus on moving people out of homelessness, while local authorities are increasing their housing output.***
- ***Planning permissions for developments should be specific regarding the type, mix and location of units to be provided as part of the Part V provision within the housing development, rather than a negotiated agreement where less attractive units are often put forward for social housing.***
- ***The need for procurement processes with both the Local Authority and within AHBs regulatory requirements for due diligence creates a longer process than that for private developers. This includes the procurement of consultants and contractors to deliver the developments. The streamlined use of approved frameworks with specifically agreed parameters for assessment would potentially speed up the process. This would involve the expansion of the existing available frameworks of contractors and consultants.***
- ***Given the challenges that the current tight and fast moving housing market presents. The Department should examine the potential for the provision of bridging finance to be provided to AHBs to secure the properties whilst the full approval and due diligence processes take place.***

#### 4.2 Land Development Agency

The Simon Communities of Ireland welcomes the established of the Land Development Agency on a statutory basis, and its stated goal of leveraging public lands to deliver housing. Housing for All should set targets for the LDA to ensure that the majority of homes built on public lands are additions to the stock of public housing.

Where homes are built on public lands for sale, these should be affordable homes. Housing for All should set out a definition of affordability, defined in relation to median household incomes, rather than current housing market prices.

#### **Recommendation**

- ***Housing for All should set out a strategic direction for the Land Development Agency that places an overwhelming focus on the building of social homes on public lands***

#### 4.3 Hidden Homelessness

It is well rehearsed that emergency accommodation numbers represent a narrow count of those experiencing homelessness, and does not include those who are sleeping rough, those in institutions with no place to move on to, those registered as homeless and accommodated in 'own door' homeless accommodation. Those suffering housing exclusion or 'hidden homelessness' are also not included. This group are recognised in the European typology of homelessness 'ETHOS' and we believe that understanding the pathways that lead to this group entering homelessness is valuable in understanding how we can prevent the individuals and families in this situation from entering homeless accommodation. The progression from insecure housing to homelessness is described in a Housing Agency report from 2015<sup>24</sup>; "Typically, these families went through a period of less stable accommodation – often living with friends or families – before approaching homeless services."

The Social Housing Needs Assessment for 2020 found that there were 61,880 households qualifying for social housing. 5.7% of those households needed social housing primarily as a result of

<sup>24</sup> <https://www.housingagency.ie/sites/default/files/45.%20Family-Experiences-Report-PDF.pdf>



overcrowding while 30% were living in accommodation deemed unsuitable. It is likely that large numbers of households on the social housing list are experiencing hidden homelessness. 24% of households listed their current tenure as “living with parents” while 10.4% described their current tenure as “living with relatives/friends”. However, there is a lack of data to demonstrate how many of these households, if any, subsequently experience homelessness, whether this information reflects the true scale of the problem, and what measures can be implemented to intervene with these households to prevent them from accessing emergency accommodation.

Understanding the levels of hidden homelessness in Ireland is necessary in order to strategically plan to address homelessness. The Department should incorporate into its Statement of Strategy an action for researching hidden homelessness. In February 2021 there were 8,238 people living in emergency accommodation. It is well rehearsed that this is a narrow count of those experiencing homelessness, and does not include those who are sleeping rough, those in domestic violence refuges, those in institutions such as direct provision or the health system with no place to move on to, those registered as homeless and accommodated in ‘own door’ homeless accommodation.

### **Recommendation**

- ***The Strategy should mandate the CSO to work with local authorities and other stakeholders, utilising quantitative and qualitative methodologies, to develop research tools to identify the levels of housing exclusion and hidden homelessness in Ireland, examine pathways into hidden homelessness and recommend appropriate data metrics for the monitoring of progress.***