

Simon Communities in Ireland



Pre Budget Submission 2017

August 2016

Table of Contents

About Simon Communities	3
Introduction	3
Budget 2017.....	6
Simon Communities Critical Priorities for Budget 2017	7
1. Preventing homelessness and keeping people in their homes.....	7
2. Access to housing and prioritisation of people who are long term homeless.....	10
3. Support in housing.....	15
Conclusion.....	16
<i>Appendices</i>	18

About Simon Communities

The Simon Communities in Ireland are a network of eight regionally based independent Simon Communities based in Cork, Dublin, Dundalk, Galway, the Midlands, the Mid West, the North West and the South East that share common values and ethos in tackling all forms of homelessness throughout Ireland, supported by a National Office. The Simon Communities have been providing services in Ireland for over 40 years. The Simon Communities deliver support and service to over 7,500 individuals and families throughout Ireland who experience – or are at risk of – homelessness every year.

Whatever the issue, for as long as we are needed, Simon's door is always open. For more information please visit www.simon.ie

Services include:

- Housing provision, tenancy sustainment & settlement services, housing advice & information services helping people to make the move out of homelessness & working with households at risk;
- Specialist health & treatment services addressing some of the issues which may have contributed to homeless occurring or may be a consequence;
- Emergency accommodation & support providing people with a place of welcome, warmth & safety;
- Soup runs & rough sleeper teams who are often the first point of contact for people sleeping rough.

Introduction

The Simon Communities work with over 7,500 people who are homeless or at risk of homelessness each year. We are now over half way through 2016 and the numbers continue to grow; with the numbers entering homelessness greater than the numbers exiting. This housing and homeless crisis is impacting every region and community around the country. It is a nationwide crisis, more acute in our urban centres but certainly present in our rural areas too. The number of people trapped in emergency accommodation has continued to grow in the first seven months of 2016. During one week in July 2016 (latest available figures), there were 6,525 men, women and children in emergency accommodation across the country; a 40% increase from July 2015. This included 2,667 adults with no dependents in their care and 1,130 families made up of 1,510 adults and 2,348 children¹.

About Homelessness – a nationwide crisis

People become homeless for a whole range of complex and overlapping reasons. Primary causes relate to poverty, inequality and lack of affordable housing, often coupled with systems failures and individual circumstance. The Simon Communities come across many reasons why people become homeless and we deal with them all. Many of the people we work with have been disadvantaged and isolated from a young age; they have been failed by the state time and time again. Homelessness is extremely traumatic and damaging having a serious impact on people's mental and physical health, as well as their overall wellbeing.

When people think of homelessness, they often think of rough sleeping. However while rough sleeping is the most extreme form of homelessness; it also includes people who are living in shelters and emergency accommodation, and other people who have no place of their own and therefore end up staying with

¹ DHPCLG Emergency Accommodation Figures July 2016 http://www.housing.gov.ie/sites/default/files/publications/files/homeless_report_-_july_2016.pdf.

family and friends, people who are living in inadequate housing or those at risk of homelessness who are living under threat of insecure tenancies or eviction.

Homelessness can happen as the result of a crisis or an accumulation of crises in a person's life. It can build up over time, sometimes years. With access to affordable housing and the right supports people can move out of homelessness quickly. Limited access to housing and support services is increasing the risk of homelessness and is preventing people moving out of homelessness. It is vital to ensure people can remain in their communities where they have family and support networks when they run into housing and financial difficulties, often times when these supports are most important. Therefore responses must be nationally driven but locally resourced and delivered.

A just and fair society with access to affordable, safe and secure housing for all

Ireland's approach to housing provision is disconnected - home ownership, the private rented sector, social housing and homelessness are approached in isolation when in fact they are all interconnected. A change in one area in relation to housing provision and supply can have a knock-on effect on other areas. The Simon Communities welcome the publishing of the Government's *Rebuilding Ireland' Action Plan for Housing and Homelessness*² and the coordinated approach contained therein to tackle the complexity of the current housing and homelessness crisis. We believe it can, and must, have a significant impact on people becoming homeless and those experiencing housing difficulties. The Plan represents the start of a process and it is essential to build on this momentum with the ongoing support of the Cabinet and members of Government. The expansion of Housing First around the country committed to is particularly welcome, acknowledging that housing with support is required to solve the homeless crisis. It is essential that this commitment is backed up quickly with clear nationwide targets. Commitment for a Private Rental Sector strategy by year end is positive; this strategy must address rent certainty and enhance security of tenure. Rent Supplement/HAP limits need to be increased on an ongoing basis in line with market rents; it is critical to keep people in their homes. We are supportive of plans to deliver 47,000 social housing units by 2021, to address vacant homes and to accelerate the Rapid Builds Programme to deliver housing units directly to those trapped in emergency accommodation. Some areas of the Plan require more detail and we are happy to contribute to this process. We anticipate that the establishment of a Housing Delivery Office and Housing Procurement Unit will ensure targets and timelines are monitored and met.

The housing and homeless crisis can only be addressed effectively with integrated plans across all forms of housing provision. We must learn from past mistakes and change expectations - we need to expect that people will move on from homelessness quickly to a decent, affordable home of their own. Some may need support – visiting or on-site. This needs to be the expectation of people who are homeless, the expectation of staff and volunteers in homeless services, and the expectation of our Government. We need to agree that every man, woman and child in this State is entitled to an affordable, safe and secure home.

Current delivery of social housing continues to be slow. There were just 75 houses built by local authorities in 2015³. Prior to the publishing of the new Action Plan this figure was well below the target set out in *Social Housing Strategy 2020*, where 35,000 new social housing units were to be delivered during

² Rebuilding Ireland: *Action Plan for Housing and Homelessness*
http://rebuildingireland.ie/Rebuilding%20Ireland_Action%20Plan.pdf

³ DECLG Construction Activity Completions by sector <http://www.environ.ie/housing/statistics/house-building-and-private-rented/construction-activity-completions>

the lifetime of the strategy⁴. Rents continued to increase nationally during quarter 2, 2016 by an average of 3.9% between April and June, matching the biggest three-month increase recorded since early 2007. In this period average national rents rose from €1,000 to €1,037. There were just 3,600 homes to rent nationwide on August 1st, which amounts to 1,000 fewer than on the same date a year previously.⁵ This is in a context where rents have increased nationally by 39.7% and the number of properties available to rent have reduced by approximately 80% since 2012.⁶ At the start of the year there were 23,344 or 17% of buy-to-let properties in arrears of more than 90 days and there were 668 buy-to-let properties in lenders possession. At the end of March 2016 there were 14,924 buy-to-let properties in arrears over 720 days. During quarter 1 2016 rent receivers were appointed to 751 buy-to-let properties. A total of 302 buy-to-let properties were taken into possession by lenders during quarter 1 2016, which represented a record high for the volume of repossessions in a quarter since the series began in 2012⁷.

Cabinet and cross departmental commitment to address the crisis urgently

We welcome the appointment of the Minister for Housing, Planning and Local Government. Given the newly published Action Plan it is critical that Minister Coveney has the authority and resources to implement the many commitments contained therein to address this crisis in a meaningful way. The publication of the cross party *Report of the Committee on Housing and Homelessness*⁸ (2016) was also a welcome development. Addressing this issue requires Cabinet and cross departmental support from key Departments including Housing, Finance, Public Expenditure and Reform, Social Protection, An Taoiseach and Health/HSE. In light of this we welcome commitments to establishment the High Level Implementation Team on Homelessness and the high level Housing Delivery Office within the Department of Housing, Planning, Community and Local Government (DHPCLG).

Right to housing

Ireland has obligations under five international covenants that refer to the right to housing, all of which have the status of legally binding treaties. According to the [Universal Declaration of Human Rights Article 25](#): *'Everyone has the right to a standard of living adequate for the health and well-being of himself [herself] and of his [her] family, including food, clothing, housing and medical care and necessary social services'*.

Adequate housing means more than just bricks and mortar; a number of conditions must be met before particular forms of shelter can be considered to constitute 'adequate housing'. These elements are as fundamental as the basic supply and availability of housing.

- Security of tenure: housing is not adequate if its occupants do not have a degree of tenure security which guarantees legal protection against forced evictions, harassment and other threats.
- Availability of services, materials, facilities and infrastructure.
- Affordability: housing is not adequate if its cost threatens or compromises the occupant's enjoyment of other human rights.
- Habitability: housing is not adequate if it does not guarantee physical safety or provide adequate space.

⁴ DECLG & Housing Agency (2014) *Social Housing Strategy 2020*

http://www.merrionstreet.ie/en/ImageLibrary/Social_Strategy_Document_20141126.pdf

⁵ Daft.ie Rental Report Q2 2016 <http://www.daft.ie/report/q2-2016-daft-report-rental.pdf>

⁶ Daft.ie

⁷ Central Bank Mortgage Arrears Statistics Q1 2016.

https://www.centralbank.ie/polstats/stats/mortgagearrears/Documents/2016q1_ie_mortgage_arrears_statistics.pdf

⁸ Report of the Committee on Housing and Homelessness (2016) Houses of the Oireachtas

<http://www.oireachtas.ie/parliament/media/committees/32housingandhomelessness/Final-Report-pdf>

The absence of a rights based approach in Ireland has contributed to the ever growing numbers of people ending up homeless, and continues to do so.

Housing First

There is a strong and well documented association between the experience of long term homelessness and a range of complex health and related needs. Housing First programmes are internationally considered to represent best practice in housing people who are long term homeless with complex needs. Housing First offers housing without preconditions and offers a range of supports focussed on harm minimisation and supporting recovery and empowerment. The success of such initiatives depends not just on housing but also, crucially, on drug and/or alcohol, mental health, and community integration services being available to tenants who were formerly homeless. *Vision for Change – report of the expert group on mental health policy* highlights the lack of adequate housing and accommodation options for enabling people with mental health issues to move through the different stages of recovery and progress towards independent living⁹. However, since 2010 the HSE budget for homelessness has been cut by 20% and the Drugs Initiative budget has seen cuts of up to 37% over the past six years. These cuts have had an adverse impact on people who are homeless and on access to treatment and one-to-one supports.

Emergency accommodation has formed the basis of Ireland's response to the homeless crisis. In some cases this has included hotel rooms and B&B's and in others additional shelter beds, often dormitory style, have been provided. As a strategy this fails to address homelessness effectively and in the long run can lead to additional problems of institutionalisation and dependency. A broad Housing First strategy, focused on people who are long term or repeatedly homeless, will substantially reduce the number of shelter beds needed and address rough sleeping and long term homelessness effectively. Analysis of shelter usage statistics in both Cork and Dublin show that a relatively small proportion of people who become homeless account for the majority of the emergency beds put in place to address the crisis. In Dublin, O'Donohue-Hynes (2015)¹⁰ found that from 2012 to 2014, of the 7,254 people that used emergency accommodation just 13% (924) could be considered long stay¹¹ shelter residents. However this group accounted for 52% of emergency bed nights¹². Remarkably, Cork Simon's most recent data mirrors that finding - 12% of residents in its emergency shelter in 2015 met the government's definition of long term homelessness, and this group accounted for 51% of shelter bed nights. These statistics clearly suggest that a strong focus on housing people who are long term homeless will have the greatest impact on freeing up emergency bed-nights and thus eliminating rough sleeping. We welcome the commitment to triple Housing First tenancies in the Dublin area by 2017. We encourage the DHPCLG to set and publish attainable tenancy targets with regard to the roll out of Housing First nationally.

Budget 2017

Government and members of the Oireachtas have an opportunity to end long term homelessness and rough sleeping by resourcing and implementing a Housing First approach in Budget 2017. This is an opportunity for the Government to begin delivering on their commitments outlined in the *Programme for a Partnership Government* on preventing and tackling homelessness. The ongoing increase in the number of individuals and families in emergency accommodation needs to be addressed urgently. The measures

⁹ Vision for change – the Report of the Expert Group on Mental Health Policy (2006) http://health.gov.ie/wp-content/uploads/2014/03/vision_for_change.pdf

¹⁰ O'Donoghue Hynes (2015) *Patterns of homeless emergency accommodation use in Dublin: how do we compare?* Paper presented at European Research Conference **Families, Housing and Homelessness** Dublin, 25th September 2015

¹¹ Long Stay* or chronically* homeless according to typologies developed by *Aubrey et al (2013) Kahn and & Culhane (2004)

¹² Total number of emergency bed-nights available" is the total number of emergency beds available in a given period.

outlined in the *Programme for a Partnership Government* and the commitments contained in the *Action Plan for Housing and Homelessness* need to be implemented as a matter of urgency. The recommendations outlined in the *Report of the Committee on Housing and Homelessness (2016)* must not be side-lined but instead given continued consideration within the context of the newly published Action Plan, with the following recommendations fast tracked:

- The refurbishment of current social housing stock as the fastest method of increasing stock as outlined in the Action Plan.
- Increase the social housing stock (owned by local authorities and approved housing bodies) by the committed 47,000 units and to review and revise this target to meet growing housing need through a programme of acquisition, refurbishment and new build.
- As part of the promised strategy for the private rented sector include measures to introduce a system of rent certainty by linking rent reviews to an index such as the Consumer Price Index (CPI) and review annually; increase security of tenure and protection from evictions for tenants and include legal safeguards for tenants living in all property types in promised legislative provisions governing tenancy terminations
- Amendment of the National Asset Management Agency Act 2009 (S.2 and S.10) to allow NAMA to be an agent for the provision of social housing.
- Housing First should be significantly expanded and prioritise people who are long-term homeless.

People must be supported to make a smooth transition from emergency accommodation to independent living as quickly as possible and must then be supported to maintain their tenancies and remain in their homes. For this to become a reality requires income adequacy, adequate rent supplement/Housing Assistance Payments (HAP) and health and social care supports. Integrated Cabinet and cross-departmental support as outlined above will be needed for these to work effectively. All of these Departments have a vital role to play in ensuring the resourcing of and access to affordable housing, to social protection supports and to the critical support services that offer the most effective means of preventing people from becoming homeless and of supporting people to move out of homelessness quickly.

Simon Communities Critical Priorities for Budget 2017

The Simon Communities call for action on three fronts in Budget 2017 to achieve the Government's goal of ending the housing shortage and addressing the homelessness crisis:

1. Preventing homelessness and keeping people in their homes.
2. Access to affordable, safe and secure housing and prioritisation for people who are long term homeless.
3. Support in housing.

1. Preventing homelessness and keeping people in their homes

Comprehensive prevention and early intervention measures must be put in place to prevent homelessness from occurring and reoccurring. In the current climate, with so many people at the edge of homelessness, a full range of early intervention measures must be resourced for households at risk.

Rent Supplement/HAP limits:

- The critical role Rent Supplement (RS) and the Housing Assistance Payment (HAP) play in preventing vulnerable people and families from becoming homeless must be acknowledged and factored into decision making.

- Recent increases in these limits announced in June 2016 are welcome but they must be monitored and adjusted on a bi-annual (6 month) basis to ensure these payments are aligned with market rents.
- It is essential that discretionary uplifts can be provided for in both schemes quickly, as and when, needed. This is supported in the *Report of the Committee on Housing and Homelessness* (2016). Flexible and discretionary powers must be made available to the Department of Social Protection's Community Welfare Service and local authorities as a vital means of effective implementation of the HAP scheme particularly in the context of its nationwide rollout.
- It is vital that people living in the private rented sector have full rent certainty with rents linked to the Consumer Price Index. This gives both tenants and landlords security of tenure.
- HAP needs to be extended to the rest of the country at a much faster pace and more tenancies need to be transferred to HAP from RS. At present only one-third of HAP tenancies are transferring from Rent Supplement¹³. The national targets for HAP are one third short of intended 2015 target.
- Prevention initiatives such as the Interim Tenancy Sustainment Protocol (ITSP)/Tenancy Protection Service (TPS) need to be extended nationally to all people who are homeless or at risk of homelessness. Specific targets for the roll out of the TPS nationwide need to be set and published as a matter of priority.
- The homeless specific HAP pilot must be extended nationally. This provides facilities for the payment of deposits and the negotiation of rents which are in excess of HAP limits.
- Access to accommodation for people, including drug free accommodation, once discharged from treatment or rehabilitation is vital therefore it is essential to tackle the barriers to RS for this group.

Funding:

- Further funding must be made available under Section 10 of the Housing Act 1988 to provide additional resources for Prevention and Early Intervention services. Currently this funding is only available to support work with those who have experienced homelessness. The scope of this funding should be expanded to support those who are at risk of homelessness to help sustain tenancies.
- Information and Advice services must be resourced to provide much needed advice to households living on the edge and struggling to pay bills, to remain in their homes. We welcome the commitment contained in the *Action Plan* to establish a new Mortgage Arrears Resolution Service and the associated Mortgage Arrears Aid and Advice Scheme. The commitment to extend the role of the RTB in raising greater awareness of tenant and landlord rights is also welcomed. Access to and awareness of the financial assistance available can prevent people from losing their home. The development of pilot local authority housing advice centres was recommended in the *Implementation Plan on State's Response to Homelessness* (2014), with a strong focus on supporting households who are homeless or at risk of homelessness.

Access to Support Services:

- Access to all necessary supports – housing support, clinical support and supports towards community reintegration - must be ensured to prevent people losing their tenancies.
- Support must be flexible allowing for the diversity of need, the differing levels of intensity and timescales for support required.

¹³ C&V Housing Pillar Bi-lateral meeting with DECLG 4th May 2016

- Since 2010 the HSE budget for homelessness has been cut by 20%¹⁴ and the Drugs Initiative budget has seen cuts of 37% over the past six years¹⁵. At the very minimum these cuts need to be reversed to ensure adequate prevention services are available. These cuts have had an adverse impact on people who are homeless, and are impacting on waiting times and waiting lists.
- We support the call in the *Report of the Committee on Housing and Homelessness* (2016) for guaranteed funding for visiting support to prevent homelessness.
- Discharging people from institutional settings e.g. hospital/prison/care system into homelessness remains an issue. Discharge protocols must be published, implemented and resourced for those leaving state care or residential institutions. This is supported in the *Report of the Committee on Housing and Homelessness* (2016). The Action Plan does not contain detailed targets in this regard.

Adequate Social Protection Supports:

- Living Wage should be introduced to reduce inequality and to ensure that low paid workers receive an adequate income.
- Social welfare payments should be benchmarked to eliminate poverty amongst recipients. We welcome the intentions of Minister Varadkar to link social welfare payments to the cost of living or to average earnings.¹⁶ We recommend the first step in such a process is to bring welfare payments above the poverty line¹⁷.
- The 12 month period that a person is on Jobseeker's Benefit before being means tested for Jobseekers Allowance must be restored so that people have the time needed to look for employment.
- Supplementary Welfare Allowance must be realigned to basic social welfare payments.

Reversing Age Related Social Welfare:

- The cuts to social welfare payments for young people under 25 years of age must be reversed as a matter of urgency. There should be equity of social welfare rates.
- Community Welfare Officers (CWO's) must be flexible to provide for situations where young people are unable to rely on family or stay in the family home.

Mortgages in distress/vulture funds:

- A strategy is required to deal with mortgage arrears. Although the Action Plan does commit to the provision of greater advice for those in mortgage arrears a wider strategy is required building on earlier reform announced in 2015. This is supported in the *Report of the Committee on Housing and Homelessness* (2016).
- Buy-to-let mortgages may not be mortgage holder's principle residence but they are someone's home. Measures to address these mortgages in distress are needed to ensure that no tenant becomes or is put at risk of homelessness as a result of repossession of buy-to-let properties. We look forward to contributing to the development of the strategy for the private rental sector which it is hoped will address this particular issue.
- There must be a requirement for financial institutions, including vulture funds, to sign up to best practice guidelines, for example those developed by the Residents Tenancies Board (RTB), to be used where there are mortgage arrears on buy-to-let properties, including where properties are in receivership or facing repossession.

¹⁴ <http://www.irishexaminer.com/ireland/funding-cuts-put-services-for-homeless-in-jeopardy-227616.html> *ibid*

¹⁵ <http://www.citywide.ie/news/2015/03/04/citywide-calls-for-confirmation-of-appointment-of-minister-for-drugs/> *ibid*

¹⁶ <http://www.irishtimes.com/news/ireland/irish-news/social-welfare-to-be-linked-to-inflation-under-varadkar-plan-1.2729649>

¹⁷ Currently the single person rate is €30 a week below the poverty line

- It is important to avoid a reduction in the number of properties in the private rented sector and to ensure that buy-to-let properties are not left vacant for long periods or are brought back into use in a timely matter.

2. Access to affordable, safe and secure housing and prioritisation of people who are long term homeless

Access to appropriate affordable housing is urgently required so that people can move out of homelessness quickly and the risk of people becoming homeless is reduced. People need the security and safety of their own home. Addressing other issues or problems a person or family may be experiencing in their lives is much more effective when people have a place to call home.

Social Housing Supply:

- The DHPCLG should monitor the delivery of the promised 47,000 social housing units on an ongoing basis and review and revise targets upwards where necessary.
- We support the call in the *Report of the Committee on Housing and Homelessness* (2016) that the Government should provide the maximum possible direct Exchequer investment in the provision of social housing in the Capital Programme.
- All possible sources of funding for social housing provision need to be explored as quickly as possible. In this context we welcome the introduction of the AHB innovation fund and encourage the exploration of further funding sources as recommended in the *Report of the Committee on Housing and Homelessness* (2016). There must be an adequate supply of units to accommodate different household types especially provision for single person units which are currently in short supply.
- The requirement for 8 weeks public consultation for Social Housing Units under Part 8 of the planning process must be reduced to speed up the building process. We welcome commitments contained in the Action Plan to streamline the process and recommend it be reduced from 8 to 6 weeks in line with recommendations contained in the *Report of the Committee on Housing and Homelessness* (2016). Where delays are 'unreasonable' emergency powers should be invoked.
- We support the call in the *Report of the Committee on Housing and Homelessness* (2016) that the Government seeks flexibility from the European Commission on the application of the EU fiscal rules to the finance of social housing.

Rapid Build Housing

- We welcome the commitment to accelerate and increase the Rapid Builds Programme to deliver 1,500 housing units directly to those trapped in emergency accommodation. This should happen within agreed time-scales and the resolution of planning permission and local issues must happen in a timely manner so no further delays are encountered.
- We welcome the commitment contained in the *Action Plan for Housing and Homelessness* that Rapid Build Housing units will facilitate more coordinated needs assessment and support planning for families to access all required services including welfare, health and housing services. This must be expedited. The roll out of Rapid Build Housing must be supported in other regions including the additional funding to support such developments as required.

Make better use of existing housing stock and voids:

- The Government has committed to making better use is made of existing housing units and that voids are brought back into use in a timely manner in the Action Plan. To ensure this happens a national register for void/empty local authority homes should be established. Tracking of voids

must be reported and the length of turnaround times from refurbishment to re-let should be published on a monthly basis by local authorities through the DECLG.

- We welcome the proposal in the *Report of the Committee on Housing and Homelessness* (2016) that the Government develop a two year strategy to reduce vacancies in general housing stock. Clear targets need to be set from the outset with a monitoring framework.
- We welcome the commitment contained in the Action Plan for funding mechanisms to incentivise swift turn around, consistent standards and pro-active approaches by Local Authorities with regard to the refurbishment and re-letting of vacant social housing units. Further detail in relation to these mechanisms is needed.
- It is important to continue to develop partnerships with Approved Housing Bodies/Voluntary Co-operatives to bring some of these properties into use.
- The use of local authority land for development by Approved Housing Bodies should be promoted to ensure an increase in housing provision. Specialist providers, in particular homeless services, should have the opportunity to develop smaller schemes for delivery of housing for people moving out of homelessness or those with high support needs.
- We welcome the commitment in the Action Plan to introduce Choice Base Lettings across all local authorities.

Resource and protect the Capital Assistance Scheme, prioritising people who are homeless:

- The Capital Assistance Scheme (CAS) must be resourced and protected as a key mechanism for the delivery of social housing to special needs groups particularly people who are homeless. Consideration should be given to an open, annual rolling process which would be available to AHB's as opportunities arise.

Support Approved Housing Bodies (AHB)/Voluntary Co-operations to access finance:

- AHB's/Voluntary Co-Operatives need to be supported to act quickly when opportunities arise. Mechanisms must be explored to improve access to finance, for example review and revision of the Capital Advanced Leasing Facility (CALF) to make it more financially viable.
- We welcome the new Housing Finance Agency approach to expedite access to finance for AHB's and recommend that they review processes to remove any barriers to full HFA approval.
- There is an urgent need to explore new funding models and mixed funding models including private finance, state funding and AHB's/Voluntary Co-Operatives working in partnership. The proposals made by the Irish League of Credit Unions should be explored.
- Local authorities must explore the potential to provide funding or housing directly to AHB's/ Voluntary Co-Operatives to allow them to deliver increased housing, to support local authorities to deliver their targets and to respond in partnership with local authorities in parallel to their own development activity.
- As mention we welcome the introduction of the AHB innovation fund, the sector led special purpose vehicle and the 'one-stop-shop' to support AHB's and look forward to more details.

NAMA:

- The expansion of the NAMA Special Purpose Vehicle (SPV) should be explored to deliver more social housing.
- The *Implementation Plan on the States Response to Homelessness* (2014) recommended that 15% of NAMA properties should be ring-fenced for vulnerable groups. This target was achieved in 2014, (319 units) but demand has continued to grow. This target should be revised upwards to 30%.

- We support the call for an increase the Part V requirement for NAMA properties from 10% to a minimum of 20% as recommended in the *Report of the Committee on Housing and Homelessness* (2016). A further 20% should be designated affordable housing units, a proportion of which should be ring-fenced for people who are homeless.
- An enhanced role for NAMA in the delivery of social housing should be explored. Further detail of the NAMA housing development programme and the significant NAMA land bank as mentioned in the *Action Plan for Housing and Homelessness* should be published quickly.
- We support the call in the *Report of the Committee on Housing and Homeless* (2016) that NAMA use its cash reserves to tackle the housing and homeless crisis.

Private Housing Supply:

- Central Bank new mortgage rules introduced in 2015 must be reviewed, taking into account any impact this may be having on the overall housing market.
- Better use must be made of existing empty private housing units and vacant private housing must be brought back into use in a timely manner. Incentives and taxation measures could be used to achieve this. See relevant recommendations in *Report of the Committee on Housing and Homelessness* (2016 p47).
- Given the urgent need for access to social housing, the reduction of Part V to 10% is of significant concern, this should be revised up to 20%.
- The vacant site levy and the ‘use it or lose it’ system of planning permission for housing developments due to take effect by 2018 must be expedited given the urgent need for housing. It is also necessary to ensure that this is stringent enough to incentivise and speed up house building.
- We welcome the development of the Local Infrastructure Housing Activation Fund as a means of ensuring the provision of necessary infrastructure to facilitate the development of land for housing as outlined in the Action Plan.

Private Rented Sector:

Comprehensive plan for Private Rented Sector

- We welcome the commitment contained in the Action Plan to develop a comprehensive strategy for the private rented sector which is urgently needed to enhance stability and security for landlords and tenants.
- This plan needs to include full rent certainty measures. While we welcome the rent stability measures that were announced in November 2015¹⁸, rents must be brought into line with real market rates and index linked for example to the Consumer Price Index (CPI). This is supported in the *Report of the Committee on Housing and Homelessness* (2016).
- A simple regime for taxation of rental income providing clear and better incentives for long term investment in the provision of good quality rental homes with secure tenancies is required as called for by NESCS¹⁹.
- The Deposit Protection Scheme which is provided for in the recent amendments to the Residential Tenancies Act should be implemented immediately.
- Quality standards in the Private Rented Sector need to be improved including an effective inspection mechanism.

¹⁸ Department of Environment ‘Stabilising Rents, Boosting Supply’
<http://www.environ.ie/en/Publications/DevelopmentandHousing/Housing/FileDownload,43556,en.pdf>

¹⁹ NESCS (2015) *ibid*

Supply

- NESCC's (2015)²⁰ recommendations for supply side initiatives and supports to increase the supply of affordable rental housing for low income and intermediate households should be implemented which include but are not limited to:
 - Instruments to encourage provision of affordable rented accommodation including low cost loans, access to state land on favourable terms, tax incentives and loan guarantees.
 - Where state land is used for affordable housing, land ownership should be retained with a state body or a voluntary organisation with a long term commitment to provide affordable housing.

Affordable rental accommodation could be provided by voluntary housing bodies or private sector - in both cases the provision of a moderate level of subsidy in exchange for affordable rents should be provided. In this regard we welcome the development of an affordable rental programme as outlined in the Action Plan and the attached funding commitment.

Rental Accommodation Scheme (RAS)

- A review of the Rental Accommodation Scheme is required. It is intended that 2,000 social housing units will be delivered through this scheme in 2016. However, many landlords are not renewing contracts as they can get higher rent from private tenants.

Introduce and Resource Social Rental Agencies (SRA's)

- There is a need to resource and implement multisite SRA's. This model is effective in other parts of Europe and can play an important role in tackling homelessness. Such models are set out in the *Implementation Plan on the State's Response to Homelessness* (2014) and are based on a three way relationship between the landlord, tenant and services provider. The Cork Rentals initiative is a good working example (see appendix 2).

Affordable Rental

- Urgent implement of an Affordable Rental Scheme recommitted to in the Action Plan with annual funding to provide quality and affordable accommodation for households currently paying a disproportionate amount of disposal; income on rent.

Rent Supplement/HAP limits: (See as discussed under prevention see page 7)

Mortgages in distress/vulture funds: (As discussed under prevention see page 8)

Housing First and prioritisation of people who are long term homeless:

- This budget is the Governments opportunity to end long-term homelessness and need to sleep rough using a Housing First approach. Adequate funding across all Government Departments is now required to ensure its full implementation.
- Housing First services aimed at people who are long term homeless with multiple support needs must be put in place as this group accounts for more than 50% of all available emergency bed nights²¹ even though they make-up as little as 12% of the homeless population in some areas. This is supported in the *Report of the Committee on Housing and Homelessness* (2016).

²⁰ NESCC (2015) *ibid*

²¹ Cork Simon Community (2015)

- We welcome the commitment to triple Housing First tenancies in the Dublin area by 2017. We encourage the DHPCLG to set and publish adequate tenancy targets with regard to the roll out of Housing First nationwide.
- We welcome the commitment in the Action Plan that by mid-2017 hotels will only be used in limited circumstances for emergency accommodation. Rapid rehousing with support must be a priority for families and single people who are recently homeless to avoid harms associated with institutionalisation or family life in hotel bedrooms.
- There is a need for ring fenced funding and targeted supports for specialist voluntary services such as Homeless Action Teams to ensure appropriate visiting and on-site support is provided to those in private emergency accommodation.
- There must be a greater regional balance in funding for homeless services and supports in 2017, based on need and trends. Although 2016 budget has not yet been confirmed, the Midlands region only received approximately 1.5% of the national budget in 2015 and it is expected to be the same amount for 2016.
- People with the longest experience of homelessness and those with the most complex support needs must be prioritised for housing at the earliest opportunity. The Simon Communities know from experience and international evidence that this group is the most vulnerable to entrenchment in emergency shelters and rough sleeping with detrimental effects on their health and wellbeing. We welcome the commitments contained in the *Action Plan for Housing and Homelessness* for enhanced supports for people who are homeless with mental health and drug and/or alcohol issues in addition to increased funding for people with chronic and enduring health needs. We also welcome the commitment to develop pathfinder projects to develop the targeted delivery of these services into the future. We required more details about these commitments, how they will work and funding allocated.

Emergency Accommodation in the short term only:

- We welcome commitments in the *Action Plan* to ensure there is an adequate supply of emergency accommodation nationally, however emergency accommodation should only ever be used in the short term – ideally averaging no more than 7-10 days.
- Funding for emergency hotel rooms and B&B's must be additional to the homeless budget (Section 10 funding) and ring-fenced so funding is not diverted from Housing First services and other homeless services that are already stretched to capacity.

Develop progressive allocations policies for people who are homeless in line with Housing First principles:

- Allocations policies must actively prioritise people who are homeless as having the greatest level of social housing need.
- Within this, priority must be given to those who are long term homeless and who have the most complex needs for housing as this is the most effective way of ending long term homelessness and reducing pressure on the emergency shelter system.
- In line with the recommendations from the *Report of the Committee on Housing and Homelessness* (2016) we recommend that the policy of ring-fencing 50% allocations for 'vulnerable people' which includes people who are homeless be reinstated²² at the very least. This report also recommends that this policy is reviewed every six months and should ensure that the needs of people who are long term homeless are met.

²² Ministerial Direction in 2014 and 2015 allowed for 50% of allocations from Dublin local authorities must be allocated to vulnerable households including people who are homeless, this was 30% in the other major urban centres Cork, Galway, Limerick and Waterford

- All local authorities should have a requirement to and clear policy on allocating social housing to homeless households.
- Allocations should not exclude people who have a history of tenancy loss through rent arrears or anti-social behaviour.
- Housing should be viewed as a right by local authorities and as such people who are literally homeless must be housed to vindicate this right.

3. Support in housing

Adequate support in housing is critical to the success of Housing First approaches. Such approaches must be flexible, open ended and adequately resourced. The support offered needs to be three dimensional including housing support, clinical support and supports towards community reintegration, as necessary.

Housing Support:

- Funding must be allocated to support work with vulnerable households once they have moved into social housing e.g. Support to Live Independently (SLI) and intensive case management associated with Housing First Initiatives for people with complex needs being rehoused. This support ensures better quality of life for the tenant but also increases the stability of the tenancy.

Clinical Support:

- Alcohol and drug services must be resourced to target the needs of people who are homeless with alcohol and/or drug related problems. This should include rapid access to substitution treatment, detoxification, rehabilitation and aftercare countrywide.
- It is essential to provide funding for step down options and support for people once they have completed treatment so they have accommodation to go to and have a support plan in place. We welcome the commitment contained in the *Action Plan for Housing and Homelessness* that through the new National Drugs Strategy, drug rehabilitation pathways will be linked to sustainable supported tenancy arrangements. It is essential that such approaches are underpinned by housing first.
- As mentioned we welcome the commitments contained in the *Action Plan for Housing and Homelessness* for enhanced supports for people who are homeless with mental health and drug and/or alcohol issues in addition to increased funding for people with chronic and enduring health needs.
- Since 2010 the HSE budget for homelessness has been cut by 20%²³ and the Drugs Initiative budget has seen cuts of 37% in the past six years²⁴. At the very minimum these cuts need to be reversed to ensure adequate support services are available. These cuts have had an impact on people who are homeless and are impacting on waiting times and waiting lists.
- The mental health budget needs to be protected. The development of mental health services for people with co-morbid mental health, people with dual diagnosis (mental health and drug and/or alcohol issues) and people experiencing homelessness. We welcome the commitment contained in the *Action Plan for Housing and Homelessness* for a more coherent government wide response. We continue to support the call in the *Report of the Committee on Housing and Homelessness* (2016) for increased resourcing for and improved coordination between HSE mental health services and homeless service providers.

²³ <http://www.irishexaminer.com/ireland/funding-cuts-put-services-for-homeless-in-jeopardy-227616.html> ibid

²⁴ <http://www.citywide.ie/news/2015/03/04/citywide-calls-for-confirmation-of-appointment-of-minister-for-drugs/> ibid

- It is essential to ring-fence a dedicated funding stream for the full implementation of *Vision for Change*.
- The proposal in the *Implementation Plan on the State's Response to Homelessness* to provide a dedicated Community Mental Health Nurse in each ISA²⁵ area to support the needs of people who are or at risk of homelessness needs to be actioned. This is supported in the *Report of the Committee on Housing and Homelessness* (2016).

Community Integration:

- Engagement in employment, education and training offers people a means of generating independent income, opportunities for developing social networks, and a way to enhance skills and self-esteem, among other benefits. This is particularly important for people who are long-term unemployed, a category that applies to many people who are homeless.
- The Social Protection System must ensure supports for people exiting homelessness include measures aimed at assisting them to access education, employment and training opportunities.
- Existing *Back to Work* and *Education and Training Programmes* must work more effectively to include people who have experienced homelessness. Secure and quality employment must be available once study or training programmes are completed.
- Cuts to education and training allowances in recent budgets, such as book grants, need to be reversed so that people can take up opportunities.

Joint working with and between Government Departments and agencies:

- Effective interagency, interdisciplinary and multidisciplinary working is essential to the success of Housing First approaches. Integrated approaches ensure that people have access to the most appropriate services and supports ensuring early intervention and prevention improving outcomes.

Conclusion

Budget 2017 is a critical budget for this Government; it is also a critical budget for people who are homeless and experiencing housing instability. It is time to ensure that there will be an end to long term homelessness and rough sleeping by resourcing and implementing a Housing First approach. Limited access to housing and support services is both increasing the risk of homelessness and is preventing people from moving out of homelessness. We cannot keep offering people short term solutions with little attention paid to their longer term needs. Over 6,500 people are trapped in emergency accommodation right now. Families are living in one room trying to go about their lives; cooking, playing, sleeping and doing homework all in the one room. Adults are sleeping in dormitory style accommodation with 20 plus others with no privacy and nowhere to go during the day. These are people that the State are failing who have no option of a home anytime soon. People are entitled to better.

The Government must urgently act on commitments contained in the *Programme for a Partnership Government* and the *Action Plan for Housing and Homelessness*. This requires Cabinet and cross departmental support and resourcing from key Departments including Housing, Finance, Public Expenditure and Reform, Social Protection and Health/HSE. The solutions to this crisis involves preventing people from becoming homeless and providing access to affordable, permanent housing with support., as necessary (Housing First). We know this approach works and we know that it can transform the lives of people

²⁵ ISA – Integrated Service Areas are Community based health services outside acute hospitals for people with low-medium level of need in primary care, social care, mental health and health & wellbeing.

who are living in hostels, hotels and B&B. Critical to this is the belief that access to housing is a right and that every man, woman and child in Ireland is entitled to a safe, secure and affordable home.

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Appendix 1: Housing and Homelessness Crisis in numbers

- During one week in July 2016 (latest available figures), there were 6,525 men, women and children in emergency accommodation across the country; a 40% increase from July 2015. This included 2,667 adults with no dependents in their care and 1,130 families made up of 1,510 adults and 2,348 children. (DECLG, 2016).
- On Census Night, 24th April 2016, there were 171 people without a place to sleep in Dublin City. This included 102 people sleeping rough and 69 people sheltering at the Nite Café. Unfortunately, Dublin is the only area where an official rough sleeper count takes place, making it difficult to get a countrywide rough sleeping picture. (DRHE 2015).
- Figures from Cork Simon Community indicate that rough sleeping in Cork City increased nine-fold in four years (2011-2015) from 38 people sleeping rough in 2011 to 345 people sleeping rough in 2015.
- Homelessness and housing insecurity are more acute and visible in our cities but the Simon Communities are working at capacity countrywide – in urban and rural areas.
- There are at least 90,000 people on the social housing waiting list. (Housing Agency, 2014).
- Social housing commitments will take time to begin to deliver housing. This is far too long for the people we work with and those at risk of homelessness. Social housing output for 2015, reached 1,030 new builds and acquisitions with new builds accounting for 75 units. (DECLG, 2016). This is below the Social Housing Strategy target of 18,000 new units for the period 2015-2017.
- Rents increased by 32.2% and the number of properties available to rent has reduced by approximately 77% since April 2012 with the average national rent now €1,037 (Daft.ie Rental Report Q2 2016).
- *Locked Out of the Market III* (Jan 2016 Simon Communities) found that 95% of rental properties are beyond the reach for those in receipt of state housing support. Of all the properties available to rent in the eleven regions studied, only one was available for a single person see <http://www.simon.ie/Publications/Research.aspx>
- 41.2% of all accounts in mortgage arrears are in arrears of over two years. (Central Bank of Ireland, 2016).
- At the start of the year there were 23,344 or 17% of buy-to-let properties in arrears of more than 90 days and there were 668 buy-to-let properties in lenders possession. At the end of March 2016 there were 14,924 buy-to-let properties in arrears over 720 days. During quarter 1 2016 rent receivers were appointed to 751 buy-to-let properties. A total of 302 buy-to-let properties were taken into possession by lenders during quarter 1 2016, which represented a record high for the volume of repossession in a quarter since the series began in 2012.
- 750,000 people are living on poverty in Ireland (*Poverty, Deprivation and Inequality* (July 2016) Social Justice Ireland Policy Briefing).
- Since 2007 the deprivation rate, which looks at the number of people forced to go without at least 2 of 11 basic necessities examined, in Ireland has doubled - 29% of the population or 1.3 million people are experiencing deprivation (Social Justice Ireland *ibid*).

Appendix 2: Cork Simon Community's Social Rentals

Cork Simon Community's Social Rentals is an initiative Cork Simon rolled-out in late 2014 as housing became increasingly difficult to access for people attempting to exit emergency accommodation. The availability of appropriate housing to activate a Housing First approach to ending homelessness was inadequate. Private rents started to increase as the number of private rented properties available in the Cork area started to fall. More people were becoming long-term homeless, resulting in increasing

numbers of people having no choice but to sleep rough. The Cork Rentals initiative sees Cork Simon renting properties directly from private landlords. For the duration of the lease, Cork Simon guarantees monthly rent, manages the property, including any maintenance, and commits to returning the property to its original state and the end of the lease. Cork Simon sub-lets the property to people stuck in emergency accommodation, prioritising people who are long-term homeless, and provides tailored one-to-one visiting support for as long as each tenant requires. The success rate matches international Housing First outcomes - 89% of tenants housed under the initiative remained housed 12 months later; 69% required fewer supports.