

Simon Communities of Ireland Submission on the Statement of Strategy 2021-2025 for the Department of Housing, Local Government and Heritage

Overview of SCI

The Simon Communities support over 16,700 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 new Statement of Strategy for the period 2021-2025 presents an important opportunity for the Department of Housing, Local Government and Heritage to take stock of and reassert efforts to tackle the crisis of homelessness. By prioritising ending homelessness as a key aim over the Strategy period, the Department will align closely with the Programme for Government stated aim to tackle homelessness, and align with the consensus across the political spectrum and society to end the current housing and homelessness crisis.

The Covid-19 crisis has demonstrated what an all-of-government crisis response looks like. The lessons from the pandemic should be applied to the homelessness crisis with the same focus, ambition and determination. With the expiration of Rebuilding Ireland, this new strategic planning period must involve the development of a new national plan for ending homelessness, with ambitious targets and timelines. The Department of Housing should take a lead on the development of a national plan to end homelessness, coordinating an all-of-government response.

This submission outlines the key priorities which the Department of Housing should consider including in its Statement of Strategy in order to meet the stated aim of the Programme for Government to tackle homelessness. In particular, the Simon Communities believe that the Department should prioritise over the course of this strategic planning period the development of homelessness prevention measures, and developing the policies and supports that help people avoid becoming homelessness in the first place.

List of Key Commitments in the Programme for Government relevant to the Department of Housing and Tackling Homelessness

- *We believe everybody should have access to good quality housing to purchase or rent at an affordable price, built to a high standard.*
- *Over the next five years we will tackle homelessness*
- *Reducing and preventing homelessness is a major priority for the Government*
- *We will focus our efforts on reducing the number of homeless families and individuals and work with local authorities and housing agencies to support them into long-term sustainable accommodation.*
- *Increase funding and work with stakeholders, case workers and homeless people on a suite of measures to help rough sleepers into sustainable accommodation.*
- *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.*
- *Ensure that Rent Supplement and Housing Assistance Payment (HAP) levels are adequate to support vulnerable households, while we increase the supply of social housing*
- *Move away from dormitory-style accommodation on a long-term basis and aim to provide suitable tenancies.*
- *Develop a National Youth Homelessness Strategy.*
- *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.*
- *Increase the social housing stock by over 50,000 over the next five-years, the majority of which is to be built by local authorities, Approved Housing Bodies and State agencies.*
- *We will hold referendums on housing and extending the franchise at presidential elections to Irish citizens living outside the State.*
- *In addition to the measures on housing set out above, the Government will establish a Commission on Housing to examine issues such as tenure, standards, sustainability, and quality-of-life issues in the provision of housing.*

Recommendations

Strategic Goals

The Department's statement of strategy for 2017-2020 did not include explicit reference to homelessness in its strategic goals. Given the heightened importance the public health crisis has brought to ending homelessness, it is appropriate that a strategic goal to tackle and end the homelessness crisis in Ireland be included as one of the core, high level goals of the Department for the period 2021-2025. This should be in addition to the broader goal of providing for a stable, sustainable supply of good quality housing.

Referendum on the Right to Housing

The Programme for Government commits to holding a referendum on housing in its lifetime. Tánaiste Leo Varadkar has referred to this as a referendum on a right to housing in

the Dáil. The Department must ensure that the process behind holding this referendum is a priority in its Statement of Strategy for the coming years. Given the detailed work that is required to ensure that Constitutional change has the desired and most beneficial impact, this work should begin early in the strategic planning cycle.

Recommendation

- *The Department should ensure that its Statement of Strategy 2021-2015 includes high level commitment to ensuring that a referendum on a right to housing be expedited and held early in the lifetime of this Government.*
- *The Statement of Strategy should include an indicated timeline for the development of this referendum, with key milestones laid out.*

Commission on Housing

The proposed Commission on Housing in the Programme for Government presents an opportunity for the Department to consider systemic and structural issues in the Irish housing system. The terms of reference of this Commission should allow for civil society to contribute to the process.

Recommendation

- *As part of its strategic planning, the Department should ensure that establishing a Commission on Housing allows for a meaningful consultation process with recommendations to be considered and implemented in the life of the current Government.*

National Strategy on Ending Homelessness

Following the expiration of Rebuilding Ireland, a new, cross-departmental action plan for ending homelessness must be developed by the Department. Commitment to developing a new action plan should be included in the Statement of Strategy, with the major programme for government commitments a starting point from which the plan should be developed.

Homelessness prevention measures should form a key part of this plan, including enhanced inter-agency cooperation to help identify where a household is at risk of homelessness in advance of a crisis point being reached, increased support for local authority outreach teams and tenancy sustainment.

Separately in the Programme for Government, there is a commitment to develop a national strategy for youth homelessness. The Department should include in its statement of strategy that it will work closely with the Department of Children, Equality, Disability, Integration and Youth in developing this strategy, and ensure that it aligns with the broader national policy goal of ending homelessness.

Recommendations

- *The Statement of Strategy should commit the department to develop a new action plan for tackling homelessness in Ireland, to replace Rebuilding Ireland*
- *The Strategy should include an explicit action on developing homelessness prevention measures.*

- *Commit to developing the National Strategy on Youth Homelessness, aligning the goals and actions with a new strategy on homelessness to replace Rebuilding Ireland*

Social Housing and Housing Supply

The Programme for Government has committed to increasing the social housing stock by 50,000 units over the next 5 years. In 2019 Social Housing Needs Assessment figures showed that 14,000 households were added to the list in that year. This indicates that the government will have to provide 15,000-20,000 units of social and affordable housing a year. The Department should ensure that in developing its 2021-2025 strategy, it develops ambitious targets for social housing which meet the level of need. A particular focus should be given in the Department's strategy to ensuring that the mix of units matches the evidence base for social housing needs. This means ensuring that there are adequate one and two bedroom units for single people and small households.

The Programme for Government also makes commitments to develop a programme of cost-rental housing, and to expand the Housing First programme.

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 that the cost-rental model.

Recommendations

- *The Statement of Strategy for the period 2021-2025 should lay out explicit targets for the building of social housing, including the mix of units*
- *The Statement of Strategy should lay out explicit targets for the expansion of Housing First*
- *The Statement of Strategy should lay out explicit targets for the development of the cost rental model of housing provision.*

Private Rental Market Reforms

Evictions and unsustainable rent increases have been the key drivers of family homelessness since the current crisis began in 2013. The moratoria on evictions and rent increases during the early pandemic period led to a marked decrease in family homelessness, demonstrating that reforms of the private rental market can have a significant impact in terms of homelessness prevention.

The Simon Communities of Ireland believe that nobody should be evicted into homelessness. Where an eviction may lead to homelessness, outreach teams and local authority supports should be engaged until alternative, permanent accommodation can be found. We have called for legislation to reform Residential Tenancies law so that evictions into emergency accommodation are illegal.

Recommendations

- *The Statement of Strategy should include a clear commitment to continuing to reform the private rental market to ensure that people are not evicted in homelessness.*
- *Continued commitment to expanding the investigatory and inspection powers of the Residential Tenancies Board should form an action in the Strategy.*

Housing Assistance Payment

The Simon Communities of Ireland regularly conducts analysis of the private rental market, with our Locked Out of the Market research series.¹ 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. The research indicates that the recent increase in private rental market supply has been concentrated in Dublin only, with no significant improvement in affordability for prices. For families, couples and singles across the rest of the country affordable supply is still severely restricted.

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.

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 Department over the period 2020-2023.

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, as a key homelessness prevention measure, seek to ensure that Housing Assistance Payment rates match the realities of the private rental market.*

Homelessness Services- Moving on from Congregated Settings

The recent budget brought a welcome expansion in the resources available under Section 10 of the Housing Act to address homelessness. A significant element of this increase relates to the higher costs associated with public health measures and the pandemic response. In particular, the pandemic has required that homelessness services move away from the provision of dormitory-style and multi-occupancy rooms. A move towards own-door and own-room accommodation is necessary from a public health perspective. It is also very welcome from the perspective of the safety, dignity, comfort and privacy of those within emergency accommodation services. Simon Community research into the early pandemic

¹ <https://www.simon.ie/Publications/Research.aspx>

period has shown that engagement with long-term rough sleepers was in some cases far more positive when the offer available was 'own room' rather than shared accommodation. The coming strategic planning period must formalise and make permanent the progress towards moving on from congregated settings in homeless services.

Recommendation

- *In light of the pressing public health requirements, and corresponding benefits, the Statement of Strategy should explicitly lay out the priority aim of moving homeless services away from congregated settings and dormitory style accommodation, and towards the universal provision of own-door accommodation, or own-room accommodation as a minimum standard.*

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 Agency² report from 2015; "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 2019 found that there were 68,693 households qualifying for social housing. 5.3% of those households needed social housing primarily as a result of overcrowding while 28% were living in accommodation deemed unsuitable. It is likely that large numbers of households on the social housing list are experiencing hidden homelessness. 21.5% of households listed their current tenure as "living with parents" while 8.9% 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.

² Family Experiences of Pathways into Homelessness: The Families' Perspective (Dr Kathy Walsh & Brian Harvey September 2015)

Recommendation

- *Research Hidden Homelessness: The Department should commission research, utilising quantitative and qualitative methodologies, to develop 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.*

Equality and Human Rights Duty

Section 42 of the Irish Human Rights and Equality Commission Act 2014 requires that in developing its Statement of Strategy, the Department set out the equality and human rights issues that pertain to the people who use its service, and its staff. Under Section 42, the Department is then required to publish an action plan to address the equality and human rights issues it has laid out in its Statement of Strategy.

In considering the equality issues that pertain to the Department, it should be recognised in the Statement of Strategy that minority groups are over-represented in homelessness services in Ireland, including an over-representation of Travellers, Roma, minority ethnicities, people with disabilities, (including learning difficulties, mental health and addiction) and single parent families. All of these groups are protected characteristics under the Equal Status Acts.

Equality budget proofing is a key measure that departments should undertake as part of its obligations under the Section 42 Public Sector Equality and Human Rights Duty.

Recommendations:

- *The Department lay out the equality and human rights issues that pertain to its work in the statement of Strategy for 2021-2025, as required under Section 42. This assessment of issues should include reference to the disparate impact the homelessness crisis has had on particular minority groups, and lay out the actions the Department will put in place to promote equality amongst these groups in relation to homelessness over the coming strategic planning period.*