

# Simon Communities of Ireland Submission on the Statement of Strategy for the Department of Social Protection

## 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 2020-2023 should reflect the Department of Social Protection's position as one of the key agents in tackling 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 redouble efforts 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. To move toward ending homelessness, an all-of-government, inter-agency approach is required.

This submission outlines the key priorities which the Department of Social Protection 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 can play a pivotal role in homelessness prevention, putting in place the measures and supports that help people avoid becoming homeless in the first place, in addition to providing assistance to those experiencing homelessness.

## List of Commitments in the Programme for Government relevant to the Department of Social Protection 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*

- *Ensure that Rent Supplement and Housing Assistance Payment (HAP) levels are adequate to support vulnerable households, while we increase the supply of social housing*
- *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.*
- *Continue to fund the Mortgage Arrears Resolution Service, Abhaile*
- *Recognise the importance of ancillary benefits and eligibility criteria to vulnerable groups (welfare payments)*
- *Improve jobseeker supports for people aged under 24 over the lifetime of the Government*

## **Recommendations**

### **Homelessness Prevention Measures – Welfare Rates**

The Simon Communities of Ireland believe that the key to ending the homelessness crisis is putting in place homelessness prevention measures which will stop the flow of people into homelessness. The Department of Social Protection should make homelessness prevention a key priority over the coming strategic planning period. The key measure to support homelessness prevention is ensuring that welfare rates are adequate to ensure people have sufficient income to meet their housing needs.

#### ***Welfare Payments related to Housing***

The Simon Communities of Ireland regularly conducts analysis of the private rental market, with our Locked Out of the Market research series.<sup>1</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. 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.

Welcome changes were made to the qualifying rules for rent supplement during the Covid-19 crisis. These rules played an important role in homelessness prevention by helping to bridge the income gaps and ensure that tenants do not fall into arrears. The flexibility shown to the application of rent supplement has been beneficial, however many of those who have been in receipt of the Pandemic Unemployment Payment have not been aware that they are eligible for rent supplement. It is crucial that those eligible for rent supplement

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

be made aware of this now. People on the PUP who have entered into rent arrears should be enabled to apply for rent supplement retrospectively to cover the period. Those who would have been eligible for rent supplement but have now returned to employment should be able to apply for an emergency needs payment to meet the cost of any arrears that have built up.

Given the severe uncertainty the coming years will bring in light of the ongoing pandemic, flexibility and adaptability in the provision of payments such as rent supplement should be core principles of the Department over the period 2020-2023.

*The Simon Communities of Ireland recommends that the Department;*

- *Adopt a flexible and adaptable approach to provision of rent supplement and other welfare payments over the coming years, given high levels of uncertainty faced by renters.*
- *Conduct regular analysis of availability of affordable accommodation in the private rental market and, as a key homelessness prevention measure, seek to ensure that rent supplement rates match the realities of the private rental market.*
- *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 should 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 having been built up during the pandemic period.*
- *Those in rent arrears who return to employment (and so are no longer eligible for rent supplement) should be facilitated to apply for and receive an emergency needs payment in respect of arrears.*

### **Social Welfare and Income Adequacy**

The Covid-19 pandemic payments, set at substantially higher rates than standard payments, are an acknowledgement that the standard social protection rates are insufficient for people to maintain a minimum essential standard of living during a time of crisis. Equally, homelessness is a time of crisis in a person's life, and standard social protection rates should reflect that.

There is broad consensus across anti-poverty, homelessness, children's, women's and minority rights groups that moving towards setting welfare rates to meet the Minimum Essential Standard of Living is a key measure to for tackling poverty and homelessness, and promoting equality amongst marginalised groups. The Department should consider including a roadmap in its 2020-2023 strategic planning period to reform the welfare payment system to ensure that rates are benchmarked against the Minimum Essential Standard of Living, as developed by the Vincentian Partnership.

Access to adequate social protection supports and income adequacy remains the primary means of reducing poverty and inequality and is a central component of homelessness prevention. For many people experiencing homelessness, social protection payments are

their only source of income. Strategic planning and progressive budgetary allocation are required to address income adequacy and equitable access to all social protection supports. Increased budgetary allocation in this regard would be consistent with progress towards the national social target for poverty reduction and can be justified by the State's positive performance in relation to the poverty reduction effect of social transfers and the impact of social transfers on income inequality.

*Recommendation:*

- *This Statement of Strategy should set out a roadmap for benchmarking social welfare against liveable income. The social infrastructure necessary to prevent end homelessness necessitates having a social protection system that meets the requirements of those who need it.*

### **Intreo Offices- Homelessness Prevention**

The Simon Communities regularly work to prevent individuals and families becoming homeless when their housing situation has reached a crisis point. Social welfare Intreo offices provide an important space to identify and flag where a person or family is at risk of becoming homeless before they have done so. Early intervention to prevent homelessness can help in turning the tide on homelessness. A cost neutral measure that can make a difference, Intreo office staff should ensure that where they identify that a person or family are at risk of homelessness, they put that family in touch with local authority homelessness prevention support and outreach teams. While such good work regularly happens in Intreo offices across the country, the practice of identifying those at risk of homelessness and signposting people to homelessness prevention supports should be recognised and formalised in the work of Intreo office staff.

*Recommendation;*

- *In the coming strategic planning period, the Department should utilise the Intreo office system to actively seek to identify those individuals and families at risk of homelessness, and refer them on to the appropriate homelessness prevention supports.*

### **Training and Employment**

Education, training and development are part of the solution in terms of prevention of homelessness, and preventing people who are homeless re-entering homelessness. Over the coming strategy planning period, The Department should ensure that training and education opportunities that it funds for people on social welfare payments are fully accessible for those experiencing homelessness.

### **Disability**

27% of people who experience homelessness in Ireland have a disability, twice the rate of the non-homeless population.<sup>2</sup> The Department has a significant role in relation to supports for people with disabilities through the provision of different allowances, and the funding of

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<sup>2</sup> <https://www.ihrec.ie/app/uploads/2018/06/Discrimination-and-Inequality-in-Housing-in-Ireland..pdf>

disability information and advocacy services through Citizens Information and the National Advocacy Service for People with Disabilities. The Statement of Strategy for the period 2020-2023 should put promoting equality for people with disabilities as a key priority. Explicit recognition should be made of the disproportionate impact the homelessness crisis and housing exclusion has had on people with disabilities.

*The Simon Communities of Ireland recommend;*

- *The Department ensures that in assessing people with disabilities for social welfare supports, officers are cognisant of the housing needs of the person, and the impact their decision may have on the viability of the person's current housing situation where they are deemed ineligible for a support.*
- *The Department should ensure that information and advocacy services for people with disabilities, including those through the Citizens Information Board and National Advocacy Service are fully funded and placed on a statutory footing, to ensure people with disabilities have effective advocacy support when navigating the housing and homelessness system.*

### **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 human rights and equality 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 nine equality grounds of 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.

*The Simon Communities of Ireland recommend;*

- *The Department lay out the equality and human rights issues that pertain to its work in the statement of Strategy for 2020-2023, as required under Section 42 of the IHREC Act 2014. This assessment of issues should include reference to the disparate impact the homelessness crisis has had on groups with 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.*