



**Submission to the Department of Employment
Affairs and Social Protection to inform the Statement
of Strategy 2017-2020**

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Introduction

The Simon Communities in Ireland welcome the opportunity to make this submission to inform the development of the Department of Employment Affairs and Social Protection (DEASP) Statement of Strategy 2017-2020. The housing and homelessness crisis continues to escalate impacting every region in the country. According to the most recent data available 8,160 people are living in emergency accommodation, including 3,234 adults without dependents in their care and 1,429 families composed of 1,953 adults and 2,973 children. This is in addition to the many thousands of households living in precarious tenancies experiencing ongoing housing instability. Despite the *Rebuilding Ireland: Action Plan for Housing and Homelessness*, more is required to arrest the increasing numbers of households entering homelessness as a result of the malfunctioning housing system and underlying social inequality and poverty. Income adequacy is central to preventing homelessness and keeping people in their homes. DEASP has a central role in the continued administration and delivery of vital supports for people who are homeless or at risk of homelessness. These supports are critically important to keeping people in their homes, preventing homelessness from happening in the first place in addition to supporting households in emergency accommodation to leave homelessness behind. This submission will firstly review the current Statement of Strategy, examining the existing and newly transferred functions of DEASP. Thereafter, a series of recommendations are presented applicable to the current functions of DEASP under the Simon Communities in Ireland three critical priorities for Budget 2018: (1) Preventing homelessness and keeping people in their homes; (2) Rapid access to affordable, safe and secure housing and prioritisation of people experiencing long term homelessness; (3) Support in housing. This is followed by an exploration of three strategic priorities that if advanced can contribute to ending the current housing and homelessness crisis and preclude its reoccurrence in the future.

Review of Statement of Strategy 2016-2019

A review of the current Statement of Strategy is the starting point in the development of a successor strategy document. This section will also address some of the functions being transferred from the Department of Jobs, Enterprise and Innovation to the newly named Department of Employment Affairs and Social Protection.

- The recognition of the Department's 'key role in reducing poverty, disadvantage and inequality' in the Statement of Strategy 2016-2019 was a welcome inclusion. Given the worsening national housing and homelessness crisis, there is a need for the inclusion of people experiencing homelessness as a named target group in the upcoming Statement of Strategy given the disproportionate levels of poverty, disadvantage and inequality experienced by these households.
- The Department should maintain and develop its client centred approach to the delivery of its operations as recognised in the 'overall objective' of the current Statement of Strategy. The further inclusion of this client centred approach in 'Objective 1' is equally welcomed and it should be retained.
- We believe the following strategic objective should be included in the Statement of Strategy 2017-2020: 'Improving society and the living standards of all citizens'. Key outcomes and indicators of this objective would include the following:
 - Raising social welfare rates to close the gap between current rates and the recognised poverty line.
 - Benchmarking social welfare payments to eliminate poverty amongst recipients.
 - Introducing the living wage to reduce inequality and to ensure that low paid workers receive an adequate income.

- The transfer of responsibility for the Low Pay Commission and legislative responsibility for the National minimum wage to the Minister of the Department of Employment Affairs and Social Protection is significant. Income adequacy is central to preventing homelessness and keeping people in their homes. Low and middle income families are struggling to meet increased housing costs, often going without essential items to meet monthly rent payments. The absence of affordable housing across the Irish housing system must be considered a primary variable in the Minister's and Department's policy and legislative work in this regard.
- We welcome the commitment to continue 'to foster the good working relationships the Department has with other Government Departments, public sector bodies and contracted service providers'. A whole of Government approach is now required to solve the housing and homelessness crisis. Close co-operation and agreed targets between DEASP and the Department of Housing, Community and Local Government (DHCLG) will be vital to the successful implementation of Housing First targets and the continued transfer of households from Rent Supplement to HAP.
- We remain concerned that the National Social Target for Poverty Reduction will not be reached by its 2020 deadline. While we recognise the importance of education and readiness for work as a means of reducing poverty, the Statement of Strategy 2016-2019 must recognise the importance of access to affordable housing as a key determinant in reducing poverty, inequality and disadvantage.
- Of equal concern is the likelihood that the child-specific social target will not be reached by 2020. Census 2016 data reveals that the vast majority of children enumerated as homeless on Census night 2016 belonged to one-parent families. Female parents accounted for 95.8% of all one parent families. The Statement of Strategy must acknowledge the link between women's experiences of poverty, disadvantage, inequality and the growing crisis in child and family homelessness in the State.¹
- We welcome recognition of the Department's public sector duty under Article 42 of the *Irish Human Rights and Equality Commission Act, 2014*. In accordance with Section 42(2)(a) of the Act we encourage the Department to outline in its Statement of Strategy 2017-2020 an assessment of the human rights and equality issues it believes to be relevant to the functions and purpose of the body and the policies, plans and actions in place or proposed to be put in place to address those issues.
- We welcome the inclusion of the Department's key responsibilities for the delivery of commitments contained in the *Programme for a Partnership Government*. In this regard we particularly welcome recognition of the Departments role in protecting low-income families in private rented accommodation through expansion of the Tenancy Sustainment Protocol, increasing Rent Supplement limits and the provision of discretionary enhanced payments to meet spiralling market rents. Now more than ever this role is of utmost significance as low and middle income families are being locked out of the private rental market.
- The Department has shared ownership of a number of key actions in the *Rebuilding Ireland Action Plan for Housing and Homelessness*. In light of this central role, we encourage the Department to include these key responsibilities in the Statement of Strategy 2017-2020 on completion of the ongoing review of *Rebuilding Ireland*.
- We welcome the transfer of lead responsibility for the Council of Europe Social Charter and co-ordination of responses on the Social Charter. Under Article 31, Parties to the Charter undertake to promote access to housing of an adequate standard; prevent and reduce homelessness with a view to its gradual elimination; and make the price of housing accessible to those without adequate resources. The Statement of Strategy 2017-2020 should prioritise the State's ratification of Article 31 and the advancement of the rights and obligations contained therein.

¹ CSO, 'Census of Population 2016 – Profile 5 Homeless Persons in Ireland', August 2017, <http://www.cso.ie/en/releasesandpublications/ep/p-cp5hpi/cp5hpi/hpi/>.

Preventing Homelessness and Keeping People in Their Homes

A broad range of comprehensive prevention and early intervention measures are required to reduce the risk of homelessness occurring. Specific measures are required to prevent homelessness occurring in general, and amongst those at an increased risk of homelessness due to crisis situations in their lives, and those that have already been affected by homelessness. Continued funding and expansion of vital state housing payments is crucial as the State turns to the private rented sector for the provision of social housing tenancies. 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. We welcome recent commitments to roll out a targeted national awareness campaign for homeless prevention and the promotion of current services, including the Tenancy Protection Service. The development of a homelessness prevention strategy for non-nationals without entitlements is welcome in light of Census 2016 figures which showed that 849 people enumerated as homeless on Census night were non-nationals.

Rent Supplement/HAP limits

The most effective way to prevent homelessness is to increase availability and access to social and affordable housing.² An increasing number of people are entering homelessness from the private rented sector.³ Spiralling rents and historically low supply has created a competitive and crowded market place rendering Rent Supplement and HAP payments increasingly ineffectual. Strategic planning and budgetary allocation for the maintenance of Rent Supplement and HAP tenancies must be cognisant and keep pace with rising private market rents and chronic low supply, factors that can severely impact on the availability and sustainability of these tenancies.

Recommendations:

- Increased budgetary allocation is required to allow for bi-annual monitoring and adjustment of Rent Supplement and HAP limits to ensure alignment with rising private market rents.
- Community Welfare Officers must be fully resourced to make urgent discretionary uplift payments to Rent Supplement recipients. This is particularly pertinent in Rent Pressure Zones (RPZ's) where tenants could face a 4% rent increase per annum over the next three years. Although these payments and uplifts are welcome and should continue, managing this on a case-by-case basis is burdensome and resource intensive not to mention stressful for the households involved.
- Single people and couples should be specifically targeted given the disproportionate negative impact inadequate Rent Supplement limits are having on these households' ability to access affordable housing.

Funding for current and future prevention measures

The launch of the *Abhaille* mortgage arrears advice service in October 2016 was welcome including the allocation of €15 million to fund the scheme to the end of 2019. Similarly, we welcome the nationwide launch of the Threshold Tenancy Protection Service. This service plays a crucial role in keeping people in their homes and in preventing entries into homelessness from the private rented sector.⁴ However, additional early intervention and prevention measures are required given the sheer scale of the crisis.

² Catherine Maher and Mike Allen, *What is Preventing us from Preventing Homelessness? A Review of the Irish National preventative Strategy*, European Journal of Homelessness, P. 131, <http://www.feantsaresearch.org/download/policy-review-2-31193700354879610979.pdf>.

³ Report links homeless families to private rented sector, <https://www.irishtimes.com/news/social-affairs/report-links-homeless-families-to-private-rented-sector-1.2396731>.

⁴ In its first year of operation, Threshold's Galway Tenancy Protection Service provided support to 534 households at risk of homelessness. The Tenancy Protection Service successfully protects over 3000 households at risk of losing their tenancy in the Dublin region, <https://www.threshold.ie/download/pdf/thresholdgalwaytps20162017.pdf>, <https://www.rtb.ie/media-research/news-centre/latest-news/2017/05/24/23-may-2017-tenancy-protection-service-awareness-campaign>.

Recommendations:

- Make funding for information and advice services fully available to provide much needed advice to households to remain in their homes. At least €5 million per annum should be allocated to maintain the *Abhaile* service beyond 2019 to assist current and future homeowners struggling to cope with mortgage arrears. This funding should be revised upwards to meet growing need when required.
- Funding should be ring fenced to ensure the continued operation of the Tenancy Protection Service. This is particularly pertinent given the volatility in the private rented sector.
- The national awareness campaign for homeless prevention and the promotion of existing services should be expedited immediately.

Adequate Social Protection Supports

Strategic planning and progressive budgetary allocation are required to address income adequacy and equitable access of all social protection supports. Increased budgetary allocation in this regard would be consistent with progress towards the national social target for poverty reduction⁵ 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.⁶

Recommendations:

- We encourage the current Minister for Employment Affairs and Social Protection to implement the proposal of former Minister for Social Protection now Taoiseach Leo Varadkar, to index link weekly social protection payments to the cost of living or to average earnings and to enshrine that principle in the Statement of Strategy and supporting legislation.⁷
- State budgets should progressively bring welfare payments above the poverty line which currently stands at €235.73 per week for a single person.⁸
- The Statement of Strategy should enshrine the principle of non-retrogression into all policies and budgetary processes to ensure decisions taken in this regard are subject to an assessment of the impact on people in vulnerable circumstances.
- Personal rent contributions should be monitored and reduced further for Rent Supplement recipients given the increasing cost of accessing housing in the private rented sector.
- The cuts to social welfare payments for young people under 26 years of age must be reversed as a matter of urgency. The principle of equity of social welfare rates for all eligible job seekers should be enshrined in the Statement of Strategy.
- 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. At a bare minimum Supplementary Welfare Allowance must be realigned to basic social welfare payments.

⁵ Department of Social Protection, 'Social Inclusion Monitor 2015 – National Social Target for Poverty Reduction', P. 18, <https://www.welfare.ie/en/downloads/SocialInclusionMonitor2015.pdf>.

⁶ Ibid, at P. 34.

⁷ <https://www.irishtimes.com/news/ireland/irish-news/social-welfare-to-be-linked-to-inflation-under-varadkar-plan-1.2729649>.

⁸ Social Justice Ireland, 'Socio Economic review 2017', P. 48, <https://www.socialjustice.ie/sites/default/files/attach/publication/4784/socioeconomicreview.pdf>.

Rapid access to affordable, safe and secure housing and prioritisation of people experiencing long term homelessness

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

Five years on from the Government's initial commitment in the *Homeless Policy Statement* (2013) to pursue a Housing Led (First) approach to solving long term homelessness, budgetary provision must be made available to deliver existing Housing First targets and expand this approach nationwide.⁹ The evidence is clear, when properly resourced and implemented as part of the fully integrated response to homelessness, Housing First can deliver significantly improved outcomes and quality of life for people experiencing long term homelessness. Effective interagency, interdisciplinary and multidisciplinary working is essential to the success of Housing First approaches. Budget 2018 should provide resources to establish a National Housing First programme with published tenancy targets for its national roll out. This programme would complement recent commitments to resource the delivery of 100 Housing First tenancies to urban centres nationwide. The appointment of a Director of Housing First within the DRHE is equally welcome in addition to the setting of specific Housing First targets for each urban area. The commitment to build more one-bed homes in conjunction with Approved Housing Bodies for those availing of Housing First tenancies is crucial to the successful achievement of these new targets.

Recommendations:

- Budget 2018 should provide resources to establish a National Housing First programme with published regional tenancy targets to complement its national roll out. The Department's role in the delivery of these targets should be included in the Statement of Strategy.

Support in Housing

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.

Recommendations

- 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. Ring fenced funding and placements on these schemes must be made available to ensure greater participation by people who have experienced homelessness. The Homeless Community Employment Schemes within the Community Services Programme is a prime example of where this approach can be delivered given people experiencing homelessness are named as a programme target group.
- Secure and quality employment must be available once study or training programmes are completed.
- Any special CE schemes need to operate with greater flexibility than current special drugs projects with more achievable social inclusion goals.

⁹ DHPCLG, Homelessness Policy Statement, February 2013, <http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Housing/FileDownload%2C32434%2Cen.pdf>.

Simon Communities Strategic Priorities for the Duration of the Statement of Strategy

Social and Affordable Housing Supply

The review of *Rebuilding Ireland* provides an opportunity to reaffirm the State's long-term vision for the delivery of social and affordable housing across all tenure types to deliver sustainable communities nationwide. The Simon Communities believe that this vision should focus on the increased provision of housing to meet different income thresholds supported through State intervention where necessary. The current ideology underpinning the housing system is one of over reliance on the private market for the delivery of housing for all tenure types which has resulted in the commodification of housing. It's clear, given the scale of the housing and homeless crisis, increased private sector supply will not deliver affordability or the required housing and tenure mix in the short to medium term. It is critical that affordability is understood as being determined by household income and ability to pay and is not dictated by the market. *Rebuilding Ireland* currently defines affordability as being '*...measured by examining the proportion measured household income that is spent to meet own housing need whether purchasing a home or renting*' (2016, p27). In addition to the human cost of homelessness and housing instability, according to PJ Drudy, the lack of affordable housing to buy or rent is "a deterrent to skilled workers wishing to return to Ireland and to the executives of foreign companies considering Ireland as a location".¹⁰ This is supported by Goodbody stockbroker's latest quarterly Irish Economy Health Check which highlights capacity constraints in the area of housing and infrastructure.¹¹

Proactive State intervention is required to deliver affordable housing across all tenure types. Local Authorities and Approved Housing Bodies (AHB's) must be resourced to build new social housing units to meet ever increasing demand as illustrated by the 91,600 households included in the most recent Social Housing needs assessments. In this regard, we fully support the establishment of a new semi-state Irish Affordable Homes Company as proposed by both National Economic and Social Council (NECC) in 2014¹² and the Nevin Economic Research Institute (NERI) in 2017¹³. The guaranteed return of affordable housing units at a set price must be the underlying condition of the granting of funding to private developers through the Local Infrastructure Housing Activation Fund (LIHAF).

Housing First

Improved outcomes for people experiencing homelessness

The 2013 Homelessness Policy Statement marked the Government's first policy commitment to pursue a housing-led¹⁴ approach to solving long term homelessness.¹⁵ Housing First offers housing without preconditions and includes a range of supports focussed on harm minimisation and supporting recovery and empowerment through Assertive Community Treatment (ACT) teams. 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 people who were formerly homeless. There are two key aspects to the Housing First¹⁶ approach - immediate provision of housing without pre-conditions or no requirement

¹⁰ Drudy, PJ (2016) The Housing Problem and the Case for Rent Regulation in the Private Rented Sector <https://www.oireachtas.ie/parliament/media/committees/32housingandhomelessness/Drudy-Submission-to-Committee-on-Housing-and-Homelessness-May-2016.docx>.

¹¹ <http://www.rte.ie/amp/895865>.

¹² NESCC (2014) *Social Housing at the Crossroads: Possibilities for Investment, Provision and Cost Rental* No: 138 http://files.nesc.ie/nesc_reports/en/138_Social_Housing.pdf.

¹³ Healy, T & Goldrick-Kelly, Paul (2017) *Ireland's Housing Emergency - Time for a Game Changer* <https://www.nerininstitute.net/research/irelands-housing-emergency-time-for-a-game-changer/>.

¹⁴ The terms Housing First and Housing Led are often used interchangeably for the purpose of this document we use the term Housing First.

¹⁵ DECLG, Homelessness Policy Statement, 2013,

http://www.homelessdublin.ie/sites/default/files/publications//Homeless_Policy_Statement_2013.pdf.

¹⁶ In 2014 research undertaken by Mental Health Commission of Canada as part of the *At Home/Chez Soi* study, the largest ever study examining the effectiveness of the Housing First approach compared with the traditional staircase approach. The study followed more than 2,000 people who were homeless over a two year period across 5 Canadian cities. The findings were very clear: The Housing First intervention was twice as effective

of housing 'readiness' and the provision of support in housing at the level required, for as long as necessary. With Housing First the goal is to move people out of homelessness as quickly as possible into permanent housing where tailored support services are more effective. These approaches, once properly resourced and implemented, improve the outcomes and quality of life for people who are homeless, or at risk in Ireland.

To date, emergency accommodation has formed the basis of Ireland's response to the homeless crisis including the use of private hotels, B&B's and emergency dormitory shelter beds. As a strategy this fails to address homelessness effectively and is contributing to increased numbers of people experiencing long term homelessness. Without the necessary supports in place people experiencing homelessness may be unable to access or sustain a tenancy or access support services. There can be issues accessing mental health services, attending primary health care facilities or utilising mental health housing programmes for active drug and/or alcohol users. People can be deemed ineligible for housing payments such as Rent Supplement, the Rental Accommodation Scheme or Housing Assistant Payment scheme if they had rent arrears in the past three years or a criminal record in the last two years. This runs contrary to the ethos of Housing First approaches and presents a real risk of institutionalisation for people in emergency accommodation.

Cost effectiveness of Housing First

Historically, an emergency-led strategy has not been effective with people spending considerable periods of their lives trapped in emergency accommodation involving the spending of high levels of statutory funding on homelessness services that have not always delivered satisfactory outcomes for households and in the long run led to additional problems of institutionalisation and dependency. The failure to deliver positive sustainable outcomes in spite of large scale statutory expenditure has been described as "the litmus test in delivering value for money".¹⁷ In the absence of local and national political and financial commitment to Housing First people experiencing long term homelessness remain reliant on an emergency led response. In contrast to this approach, the rollout of Housing First for chronically homeless people who make repeated and sustained use of emergency shelters delivers positive and sustainable quality of life outcomes for people and offers some cost effectiveness and exchequer savings.¹⁸

Reduced Emergency Accommodation Usage

Significantly better outcomes and cost savings can be achieved through reduced use of emergency homeless shelters by chronically homeless people who often account for the majority of repeated and sustained emergency homeless shelter use. The average cost of providing each bed in Supported Temporary Accommodation is approximately €29,000 per annum, not inclusive of all additional statutory and non-statutory expenditure by other state and non-state bodies.¹⁹ In Dublin, O'Donohue-Hynes (2015)²⁰ found that from 2012 to 2014, of the 7,254 people that used emergency accommodation just 13% (924) could be considered long stay²¹ shelter residents. However this group accounted for 52% of emergency bed nights.²² Cork Simon's most recent data shows similar findings - 14% of residents in its emergency shelter in 2016 met the government's definition of long term homelessness, and this group accounted for 37% of shelter bed nights.

as the staircase approach in ending homelessness for people who had been long-term homeless with complex support needs. Furthermore, the intervention led to significant cost savings when compared with traditional interventions¹⁶. The key to the success of Housing First is its comprehensive model of support for the most 'hard core' people who are homeless with the highest level of needs.

¹⁷ Eoin O'Sullivan, 'Ending Homelessness – A Housing-Led Approach', P. 24, <http://www.drugs.ie/resourcesfiles/reports/EndingHomelessness.pdf>.

¹⁸ Nicholas Pleave and Joanne Bretherton, 'The Case for Housing First in the European Union: A Critical Evaluation of Concerns about Effectiveness', P. 25, http://housingfirstguide.eu/website/wp-content/uploads/2016/03/The-case-for-Housing-First-in-the-EU-np_and_jb.pdf.

¹⁹ Ibid 11, P. 23.

²⁰ 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

²¹ Long Stay* or chronically* homeless according to typologies developed by *Aubrey et al (2013) Kahn and & Culhane (2004)

²² Total number of emergency bed-nights available" is the total number of emergency beds available in a given period.

Better quality of life outcomes - Reduced health care costs

Reductions in the use of and presentations to emergency medical and mental health services deliver significant cost savings as chronically homeless people availing of Housing First have direct access to primary health care and mental health services. This has a dual benefit of improving the general health of people who are homeless in addition to reducing hospital admissions resulting in a reduced overall cost to the healthcare system. In one study, a general practitioner and nurse led response to improving hospital care for homeless people led to a 30% reduction in hospital bed days following the first year of service.²³

Cost savings across multiple jurisdictions

Housing First has demonstrated significant cost savings across multiple jurisdictions. In the United States, a large scale study in New York found that 95% of the costs of providing Housing First were covered by the savings to health, criminal justice and other services, offsetting nearly the entire cost of implementing the programme.²⁴ Elsewhere in the United States, a pilot Housing First programme targeting veterans experiencing homelessness resulted in a 54% reduction in the cost of inpatient healthcare in addition to a 32% reduction in outpatient health care costs.²⁵ In Finland, a study of a supported housing²⁶ unit demonstrated that housing with intensified support halved the use of social and health care services compared to service use during periods of homelessness. This led to average savings of €14,000 per resident per annum with total annual savings for 15 residents in the unit in question amounting to €220,000 per year.^{27,28} In Canada, the Calgary Homeless Foundation reported annual cost savings of approximately \$2.5 million, achieved through the delivery of Housing First for 72 homeless people, equating to an average cost saving of \$34,000 per person. This dramatic reduction was largely due to significant reductions in police interactions, incarcerations and hospital stays.²⁹

Housing First targets

In 2016 we welcomed the *Rebuilding Ireland* commitment to triple Housing First targets to deliver 300 tenancies by the end of 2017. As of May 2017, 62 Housing First tenancies were in place with an additional 50 tenancies in the process of transitioning from emergency accommodation to supported tenancies in the community.³⁰ The recent announcement of the targeted extension of 100 Housing First tenancies to urban centres nationwide is a welcome development. The commitment to deliver more one-bed housing units in conjunction with Approved Housing Bodies is vital to the achievement of these new targets. The appointment of a new Director of Housing First within the DRHE and the setting of individual Housing First targets for each Dublin Local Authority is a positive step forwards. A national Housing First programme is now required with published regional tenancy targets. Despite this progress, we remain concerned about the national rollout of Housing First especially given the dearth of available housing options that could slow the delivery of the targeted 400 tenancies. Although it requires some refinement with higher targets the Repair and Lease and Buy and Renew schemes focusing on vacant/empty homes

²³ Hewett N, Halligan A, Boyce T. A general practitioner and nurse led approach to improving hospital care for homeless people. *BMJ*. 2012;345:e5999.

²⁴ Nicholas Pleace, European Observatory on Homelessness/FEANTSA, *'Housing First'*, P. 22, http://www.feantsaresearch.org/download/housing_first_pleace3790695452176551843.pdf.

²⁵ Montgomery A.E., Hill L., Culhane D.P., Kane V., *'Housing First Implementation Brief'*, P. 5, VA National Center on Homelessness Among Veterans/U.S. Department of Veterans Affairs, 2014, <https://www.va.gov/homeless/nchav/docs/Housing-First-Implementation-brief.pdf>.

²⁶ Supported housing and service housing are available to those in need of support to live independently. A person living in supported housing copes with everyday tasks almost independently. The amount of support depends on the needs of the resident. It may vary from daily to weekly visits. Supported housing may refer to a dwelling owned by the resident, a rental dwelling or some other housing type. The duration of supported housing depends on the resident's own needs and situation in life. The purpose is for the residents to organise their lives during supported housing well enough to be able to transfer to independent living.

²⁷ Ministry of the Environment (2011) *Asunnottomuuden vähentämisen taloudellisetvaikutukset*. Helsinki: Ministry of the Environment.

²⁸ *Ibid* 11, P. 30.

²⁹ Calgary Homelessness Foundation, *'The Cost Benefits of Housing First'*, <http://calgaryhomeless.com/wp-content/uploads/2014/06/The-Cost-Benefits-of-Housing-First.pdf>.

³⁰ DHPCLG, *Rebuilding Ireland Quarter 3 Progress Report*, [file:///C:/Users/eamonn/Downloads/Third Quarterly Progress Report RBI 31 May 2017%20\(5\).pdf](file:///C:/Users/eamonn/Downloads/Third%20Quarterly%20Progress%20Report%20RBI%2031%20May%202017%20(5).pdf).

are possibly the most suitable means of securing sustainable housing options to deliver sufficient housing supply to satisfy current and future housing first tenancies.

Budgetary shortfall for essential supports

It is disappointing that Budget 2017 commitments to deliver additional funding for the provision of additional care and case management assessment and intensive addiction and mental health programmes for people using homeless services will fall €2 million short of the 2017 budgetary target of €6 million. 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 physical and mental health. This commitment must be delivered in full in 2018.

Addressing Complex and Multiple Needs

People who are homeless can experience a range of health issues, which include but are not limited to, physical health issues, mental health issues, problematic drug and/or alcohol use and complex needs. People presenting to homeless services often display multiple or complex needs within these broad health categories. The prevalence of illness amongst people who are homeless is exacerbated by a lack of good quality housing and the absence of clinical and health supports in the home. People who are homeless often encounter other significant barriers to healthcare in the form of stigma, cuts to health/HSE budgets, administration of service catchment areas and the lack of homeless specialist health services. Best practice indicates that improving access to primary care services has large-scale health benefits for people who are homeless in addition to cost saving implications for the health service as a whole. The solutions to homelessness involve preventing people from becoming homeless and providing access to affordable, permanent housing with support, as necessary (Housing First). Critical to this is the provision of clinical support. We know this approach works and we know that it can transform the lives of people who are living in hostels, hotels and B&B's.

Constitutional protection for the right to housing

The absence of a rights based approach to housing in Ireland has contributed to the ever growing numbers of people entering homeless. To tackle the housing and homelessness crisis and to prevent its recurrence, the Simon Communities believe the State must now fully embrace the constitutional protection of the right to housing. A constitutional right to housing would provide a clear floor of protection in respect of access to basic adequate housing for all and would guide all future State housing policy, decision making, implementation and budgetary allocation. Constitutional protection of the right to housing would include State obligations to reasonably protect and fulfil the right in the spirit of its obligations under the International Covenant on Economic, Social and Cultural Rights (ICESCR), in addition to providing legal mechanisms for citizens to vindicate their right to housing before the courts. In the interim, the progressive realisation of the right to housing must be pursued across all housing related policy where incremental legislative change can have considerable impact on citizens' access to adequate housing.

A constitutional right to housing would not provide a right to a key to a home for all citizens. A constitutional right to housing would form a legal safeguard against which all State housing policy and decision making can be measured, challenged and against which the progressive realisation of the right to adequate housing can be pursued through policy, legislative and budgetary mechanisms. Such a right to housing would acknowledge in a meaningful way Ireland's commitment to the International Covenant on Economic, Social and Cultural Rights, would be in keeping with our international obligations in this regard and would provide a readymade legal framework from which the progressive realisation of the right to

housing could be pursued.³¹ Often people who are homeless are deprived of other basic human rights on top of their right to adequate housing.³² Without access to stable and quality housing it can be difficult, if not impossible, to realise a whole host of socio-economic and cultural rights including the right to employment, education and health.

Conclusion

We welcome the opportunity to make this submission to inform the development of the Department's Statement of Strategy 2017-2020. We believe the Statement of Strategy can play a critical role in directing and coordinating the Department's considerable mandate, particularly with regard to the administration and delivery of vital supports and payments for people who are homeless, at risk of homelessness and leaving homelessness behind. The proposed timeframe for the delivery of the Department's strategic objectives represents a critical period for people who are homeless and experiencing housing instability. The continued delivery of housing supports and payments will be vital to implementing the *Rebuilding Ireland: Action Plan for Housing and Homelessness*. The transfer of tenancies from Rent Supplement to the HAP scheme must be done in a seamless fashion to prevent any undue hardship befalling the people who rely so heavily on these supports. The continued monitoring and review of these payments is equally vital. Housing support payments can only be effective when they are reflective of private rented sector rates. The continued delivery of income and social supports is equally critical to keeping people in their homes and assisting people who are homeless to transition to independent living. Recent commitments to extend Housing First tenancies to urban centres nationwide will require cross-departmental and inter-agency cooperation. The Department's role in the delivery of these targets must be acknowledged in the Statement of Strategy. Putting clients at the centre of the Department's operations will require increased understanding of the human impact of unnecessary delays in processing vital welfare and housing support applications in addition to the requirement for expedited review and decision making processes. 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 who are living in hostels, hotels and B&Bs. 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.

³¹ Padraic Kenna, 'National Perspectives on Housing Rights – Ireland', P.6, <https://www.nuigalway.ie/media/housinglawrightsandpolicy/National-perspectives-on-housing-rights.pdf>.

³² Ibid Pp. 21-23.

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 8,300 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.

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.

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Appendix 1: Housing and homelessness crisis in numbers

- During one week in July 2017 (latest available figures), there were 8,160 people living in emergency accommodation, including 3,234 adults without dependents in their care and 1,429 families composed of 1,953 adults and 2,973 children. (DHPCLG, July 2017).
- On the night of 4th April 2017, there were 161 people without a place to sleep in Dublin City. 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 2016).
- According to Census 2016, a total of 6,909 people were enumerated as homeless on Census night 2016. Unlike Census 2011 this figure does not include those people living in Long Term Accommodation (LTA) which amounted to 1,772 people on Census night 2016. Including those living in LTA a direct comparison with Census 2011 reveals a 127.9% increase in homelessness in the intervening period between Census 2011 and Census 2016, representing a total of 8.678 people.
- 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 91,600 households on the social housing waiting list. Two-thirds of households on the list were living in the private rented sector and one fifth living with parents, relatives or friends. 5,159 households (5.6%) had at least one member considered to be homeless, a proportion which has doubled since 2013 (Housing Agency, 2016).
- 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. In 2016, just 665 new social housing units were built.
- Average national rent now stands at €1,159, representing an increase of 54% since 2012. Property availability in the private rented sector has dropped by 84% since 2012 with fewer than 3,000 properties available to rent nationwide on August 1st 2017. (Daft.ie Rental Report Q2 2017).
- *Locked Out of the Market VIII* (August 2017 Simon Communities) found that 91% of rental properties are beyond the reach for those in receipt of state housing support.
- Over 73,000 principle dwelling mortgage accounts are in arrears. 44% of all mortgage arrears are in arrears of over 720 days (Central Bank of Ireland, June 2017).
- At the end of June 2017, 19,627 or 15% of buy-to-let mortgages, were in arrears of more than 90 days. (Central Bank of Ireland, June 2017).
- 790,000 people are living in poverty in Ireland (*Budget Choices* (July 2017) Social Justice Ireland).
- In 2015, 25.5% of the population experienced two or more types of enforced deprivation. (CSO Survey on Income and Living Conditions 2015).
- According to Census 2016, there are 183,312 vacant houses nationwide.