

Simon Communities of Ireland Submission

Submission Summary

Introduction	Ensuring effective access to adequate housing is a key pillar to the EU Child Guarantee which will be SCI's focus for this submission. In order to sufficiently tackle child homelessness, we need a strong, whole of Government approach.
Child and family homelessness: Overview of the issue	The latest homeless figures saw 9,099 people in emergency homeless accommodation in Ireland including 2,548 children. Not included in this figure are the thousands of children experiencing hidden homeless.
Effect of Homelessness on the child: A Need for Action	Homelessness has a detrimental effect on children's physical and mental health, their education attainment, emotional wellbeing, and can have long-term consequences including an increased risk of housing difficulty in the future, even when housing first supports are put in place.
Reduce the Impact on Children Currently Experiencing	Summary of Recommendations: <ul style="list-style-type: none"> - The Child Guarantee National Action Plan must include a guarantee that children who enter emergency homeless accommodation are moved into secure housing as soon as possible through legislative safeguards - The Child Guarantee National Action Plan must implement measures that will minimise harms to children experiencing homelessness, including access to case workers and a discretionary budget for Local Authorities in the case of additional requirements.
The Need for Homeless Prevention Strategies	Summary of Recommendations: <ul style="list-style-type: none"> - The Child Guarantee National Action Plan must support a commitment to developing a National Homeless Strategy that prevents child homelessness using a whole of Government approach. - The Child Guarantee National Action Plan should support a legislative underpinning and a ring-fenced budget for homelessness prevention work in Local Authorities - The Child Guarantee National Action Plan should be underpinned by Rent Supplement and Housing Assistance Payment rates that align with the cost of renting, and for the 50% rate of discretion available to local authorities in Dublin to be made available to all Local Authorities. - The Child Guarantee National Action Plan should be underpinned through the enactment of legislation that actively works towards protecting renters from homelessness, including the Simon Bill: Residential tenancies (Amendment) (Extension of Notice Periods) Bill 2021.
About the Simon Communities of Ireland	The Simon Communities of Ireland have 50 years of experience providing homeless, housing and treatment services to people facing the trauma and stress of homelessness.



Introduction

The Simon Communities of Ireland (SCI) welcomes the opportunity to support the Department of Children, Equality, Disability, Integration and Youth in developing Ireland's Child Guarantee National Action Plan. Adopting the EU Child Guarantee provides Ireland with the opportunity to make real, effective, and meaningful change for children and families in Ireland experiencing or at risk of social exclusion. Ensuring effective access to adequate housing is a key pillar to the EU Child Guarantee which will be SCI's focus for this submission.

To ensure children have effective access to adequate housing, SCI firmly believes that the voices of children need to be heard. In 2012 through the Children's Rights Referendum, we strengthened children's rights in this country and ensured organisations were better equipped and able to pursue resources to improve the lives of children.

Homelessness should never be a concern for – and should never be experienced by – children in Ireland. We believe that this National Plan could be a catalyst for change and improvement that could help us to address and eradicate child homelessness.

Childhood is a vital time for development, learning, and growth. Homelessness, living in insecure housing, and living in emergency accommodation can have a devastating effect on children. This concern is echoed by European Child Guarantee stakeholders who – in a bid to minimise adverse effects – wanted to ensure 'that parents with children at risk of eviction or already homeless are not placed in homeless shelters but in temporary accommodation settings that will resemble a family environment, until a permanent solution is found.'¹ Risks to children's health and wellbeing are completely avoidable with measured steps and policy responses from the Government.

While this submission focusses on actions that largely fall under the remit of the Department of Housing, SCI would like to reiterate that in order to tackle child homelessness effectively, a cross party, cross departmental policy response is needed.

Child and family homelessness: Overview of the issue

The latest homeless figures saw 9,099 people homeless in Ireland including 2,548 children; three times the number of children homeless in mid-2014.² Thousands more children and families are living in hidden homelessness – or are at risk of homelessness – and are not captured in official reports.

Effect of Homelessness on the child: A Need for Action

Homelessness can have a major effect on a person on any stage of life, but children are of particular risk of long-term consequences. Studies show that homelessness in all forms – transgenerational homelessness, new onset homelessness, and hidden homelessness – can have a negative effect on development, learning, behaviour, and can affect opportunities later in adult life including housing security.

¹ <https://ec.europa.eu/social/BlobServlet?docId=23791&langId=en>

² [gov.ie - Homelessness data \(www.gov.ie\)](http://gov.ie - Homelessness data (www.gov.ie))

Health: Children who experienced homelessness have a 25% greater risk of poor health and have higher mortality rates compared to those with stable childhood homes.³ Research shows that homeless children are at an increased risk of several physical morbidities, particularly respiratory issues including asthma, upper respiratory tract infection, and chronic cough.⁴ Temple Street Emergency Department showed that 842 children were discharged to no fixed home address in 2018; 26% of these were under a year old.⁵ There is an increase and an overrepresentation of homeless children in recent years with a huge complexity of issues that begin even before birth presenting to the hospital.

Education: Homelessness can destabilise a child's entire education. A Children's Rights Alliance⁶ study in 2018 examined the educational needs of children experiencing homelessness and living in emergency accommodation. The study showed that school attendance is affected due to movement between emergency accommodation and a lack of suitable transport which left children exhausted before arriving to school. A lack of sleep combined with poor nutrition and hunger reduces student's participation and learning potential in the classroom. Education is further affected by changes in behaviour including increased aggression, anxiety, and agitation linked to the stress of displacement. Homelessness affects children's involvement in activities, their connection with peers, and ability to socially engage with school. This affects children's sense of security, belonging, achievement and self-esteem within the educational context.⁷

Life-long repercussions: Recent research from Canada has shown that people who experience homelessness first in their childhood are at an increased risk of homelessness and insecure housing as an adult, even when housing first supports are available.⁸ A failure to address homelessness at its source perpetuates cycles of poverty and social exclusion that can affect generations.

1. Reduce the Impact on Children Currently Experiencing

1.1. Cap time spent in homeless accommodation

Families who enter emergency accommodation are staying there for too long. According to the most recent Homeless Quarterly Progress Report, over a fifth (22%) of families in the Dublin region have been living in emergency accommodation for over 24 months. No child should have to spend their childhood living in a hotel room, B&B, or a family hub. A recent Ombudsman report examined the experiences of children living in family hubs in Ireland.⁹ The report gave voice to parents and children concerned on the lack of space and privacy, reaching developmental milestones, mental ill-

³ https://www.threshold.ie/assets/files/pdf/impact_on_homelessness_on_children_-_a_submission.pdf

⁴ https://academic.oup.com/eurpub/article/30/Supplement_5/ckaa166.729/5913714?login=true

⁵ https://www.cuh.ie/2019/01/842-children-who-attended-temple-streets-ed-in-2018-were-discharged-with-no-fixed-home-address-29-increase-on-2017-figure/#post_content

⁶ https://www.right-to-education.org/sites/right-to-education.org/files/resource-attachments/Childrens_Rights_Alliance_Home_Works%20_2018_ENG.pdf

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https://childrensrights.ie/sites/default/files/submissions_reports/files/Home%20Works%20Study%20on%20the%20Educational%20Needs%20of%20Children%20Experiencing%20Homelessness%20-%20Full%20Report.pdf

⁸ <https://bmcp psychiatry.biomedcentral.com/articles/10.1186/s12888-021-03142-0>

⁹ <https://www.oco.ie/app/uploads/2019/04/No-Place-Like-Home.pdf>



health, and anxieties over physical health with outbreaks of childhood infections meaning children were regularly ill.

Experiencing homelessness for any length of time can be detrimental to a child's health and wellbeing, even in purpose-built family hubs. Legislative safeguards are needed to cap the amount of time that homeless families with children spend in emergency accommodation.

Recommendation: The Child Guarantee National Action Plan must include a guarantee that no children will remain in emergency homeless accommodation for more than 6 months.

1.2. Ensure Timely Access to Targeted Supports

The Programme for Government has committed to 'increase funding and work with stakeholders, case workers and homeless people on a suite of measures to help rough sleepers into sustainable accommodation'. The Simon Communities of Ireland believe that every child experiencing homelessness should be guaranteed access to an assigned case worker where needed. Given the effect of homelessness and precarious housing on a child's development, health, and wellbeing, such timely measures need to be guaranteed to minimise and mitigate against risk.

Along with this, Local Authorities need to be provided with a discretionary budget to ensure any special or additional requirements – particularly for children with disabilities or additional needs – can be met as a matter of urgency and without delay.

Recommendation: The Child Guarantee National Action Plan must implement measures that will minimise harms to children experiencing homelessness, including guaranteed access to case workers where needed and a discretionary budget for Local Authorities in the case of additional requirements

2. The Need for Homeless Prevention Strategies

Homelessness prevention measures are policies designed to stop homelessness from occurring by either assisting a household to remain in their home, or assist a household to find a new home, and avoid becoming homeless.

Below are a number of homeless prevention policies which SCI have brought to attention of the Department of Housing in recent times. If the aim of the National Action Plan is to ensure effective access to adequate housing for children in Ireland, then the basics of homelessness prevention cannot be ignored. While it may directly not fall under the initial remit of the National Action Plan to implement Housing and Homelessness Policy, the following proven policies that will stop children and their families from becoming homeless in the first instance, advancing the goal of the Action Plan.

Similar to the implementation of the Child Guarantee National Action Plan, homeless prevention policies require a whole of Government approach. To prevent the trauma of homelessness affecting future generations, we need to put the work in now and ensure every possible action is taken to prevent children from experiencing homelessness in Ireland.

We cannot have a successful Child Guarantee National Action Plan without an effective housing system focussed on preventing homelessness.

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

A legal underpinning for local authorities to provide homelessness prevention support to individuals should be introduced. An example of this legislative provision is the Welsh 2014 Homeless Act which sought to put a duty on local authorities to prevent homelessness where possible.¹⁰ Such legislation would seek to formalise and extend and build upon the sound prevention work that Local Authorities already undertake in Ireland.

For example, the granting of the additional 50% homeless HAP uplift in Dublin is a prevention measure that Dublin local authorities can take where they deem a person to be at risk of homelessness. The latest data from the Department of Housing for Q3 2021 show that of the families presenting to homeless services in the Dublin Region in Quarter 3, 47% were prevented from entering emergency accommodation by way of a tenancy having been created. In the year to date, 53% of families presenting to homeless services were prevented from entering emergency accommodation by way of a tenancy having been created. Without the assistance of their Local Authority, those families would likely have been forced to enter emergency homeless accommodation.

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

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

Recommendation: The Child Guarantee National Action Plan should support a legislative underpinning and a ring-fenced budget for homelessness prevention work in Local Authorities.

2.2. Increase Rent Supplement and HAP rates

The Locked Out of the Market series, demonstrates that there is an ongoing chronic lack of supply of private rental accommodation within HAP rates across the country. The most recent analysis of the private rental market by the Simon Community in Q3 of 2021¹¹ found that there was 79% decrease in properties available to rent in October for those on housing supports as supply in the private rental market continues to worsen. The found just 23 instances of properties available within standard HAP limits for at least one of the four household categories. In 9 of the 16 areas surveyed in the October 2021 study, there were no properties available to rent in for any individual, couple, or family within standard or discretionary Rent Supplement/Housing Assistance Payment HAP limits.

¹⁰ <https://www.feantsaresearch.org/download/article-4592410342917616893.pdf>

¹¹ <https://www.simon.ie/e-publication/locked-out-of-the-market-october-2021/>



Outside Dublin the issue remains where the discretionary top-up on HAP is limited to 20% increase, rather than the 50% increase permissible in Dublin where an applicant is at risk of homelessness.

While we recognise that increases in housing support payments are a short-term measure to tackle homelessness, rent supplement and HAP rates must be at a level that reflect the reality of market rates for private rental accommodation. Adequate HAP rates are an important measure in the short-term to allow people to find appropriate private rental accommodation, and prevent households entering emergency accommodation.

Crucially, our analysis of the market shows that where increases in supply of private rental accommodation has become available as a result of the Covid-19 crisis, costs for new supply generally remain high above the standard rate of HAP. The 50% additional Homeless HAP rate should be aligned across all local authorities, to prevent individuals and families entering homelessness.

Recommendation: The Child Guarantee National Action Plan should be underpinned by RS and HAP rates that are aligned with the cost of local rent. As an important additional support the discretionary 50% HAP increase available in the Dublin region should be available to all Local Authorities.

2.3. Protect Renters: Enact the Residential tenancies (Amendment) (Extension of Notice Periods) Bill 2021

Evictions are a key driver of homelessness. The termination of tenancies leaves many families and children with no feasible housing option but emergency accommodation for a potential extended period of time. We need greater supports for renters, including prevention measures against eviction that will result in homelessness.

Protective measures for renters implemented during the Covid-19 pandemic had a clear impact in reducing family homelessness. The moratorium on evictions in 2020 saw family homelessness fall by a significant 38% in the Dublin region in November 2020 when compared to November 2019. Figures from the Department of Housing¹² show that exits from homelessness in the first 9 months of 2020 were up 0.3% on same period in 2019, signifying that the driver of the momentous fall in family homelessness has been the prevention measures which avoided new families entering homelessness in 2020 to replace those exiting. State interventions and prevention strategies work.

SCI Ireland were pleased to see the Simon Bill (Residential tenancies (Amendment) (Extension of Notice Periods) Bill 2021) pass second stage in Dáil Éireann¹³ and we urge the Government to safeguard its legal enactment in 2022.

The Simon Bill, if enacted, will provide increased protection for those facing eviction and deemed to be at risk of homelessness. Homeless services and local authorities are regularly contacted by people who are coming to the end of a tenancy notice period, and are imminently at risk of homelessness, having been unable to source alternative accommodation. In such a case if a local authorities

¹² <https://www.gov.ie/en/press-release/1a64d-homeless-quarterly-report-for-quarter-3-and-monthly-homeless-report-for-september-2020/>

¹³ <https://www.oireachtas.ie/en/bills/bill/2021/159/>



determine a person or family are 'at risk of homelessness' the amendment will trigger an extension in the notice period for that household to prevent homelessness. This determination and extension should be accompanied by a commitment to ensure that the individual or family effected will be given all available supports to take advantage of the extension and secure alternative accommodation as soon as possible.

Recommendation: The Child Guarantee National Action Plan should support the enactment of legislation that actively works towards protecting renters from homelessness, including the Simon Bill: Residential tenancies (Amendment) (Extension of Notice Periods) Bill 2021.

Conclusion

The Simon Communities of Ireland hope that the Child Guarantee National Action Plan can be a catalyst for positive social change and will ensure timely access to secure, affordable housing for children in Ireland. We hope to see increased emphasis on prevention strategies such as those outlined above to stop homelessness at its source. For children who are living in emergency homeless services or in a state of hidden homelessness, this National Action Plan needs to fast-track their journey to stable, secure, and safe housing.

About Simon Communities of Ireland

The Simon Communities 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 Northwest and the Southeast, responding to local needs and supported by a National Office in the areas of policy, research, communications and best practice. 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. For more information, please visit www.simon.ie

Services include:

- Homelessness prevention, tenancy sustainment and resettlement
- Street outreach, emergency accommodation and harm reduction
- Housing with support and Housing First services
- Homeless specific health and wellbeing services (counselling; addiction treatment and recovery; and mental health supports)
- Personal development, education, training, and employment services
- Food banks, drop-in centres and soup runs