

## Joint Oireachtas Committee Housing, Local Government and Heritage

8<sup>th</sup> February 2022

### Opening Statement to Committee.

The Simon Communities of Ireland (SCI) would like to thank the Committee for their invitation to present today.

As members of the committee are aware the second half of 2021 saw an alarming trend of increasing homelessness. The housing situation of too many people is insecure, due to rising rents in an already unaffordable private rental market and the impact of the growing cost of living crisis so the Committee's reflection on where we are on homelessness framed through the April 2021 report is both timely and welcome.

In reviewing the progress made in relation to the 17 recommendations made in the Committee's April 2021 report on Homelessness, we are conscious that since that time *Housing for All* has been launched. The commitments in *Housing for All* mirror many of the recommendations outlined in the committee's report and we have acknowledged that in our submission below, where we respond to progress in the areas of the recommendations in the Committee's report more comprehensively.

Particularly welcome in the Housing for All plan was the commitment to ending homelessness by 2030. This ambition of the plan builds on the successful collaborations that happened as we worked to ensure those experiencing homelessness were protected during the pandemic. The ongoing commitment to Housing First and to the strengthening of integrated care pathways, and case management for people experiencing homelessness is equally welcome. The development, enhancement and successful implementation of these recommendations over the coming months will be critically important.

Areas pertinent to the recommendation of the committee where there is a need for particular focus include:

- **Homeless Prevention:** We need a greater focus on Homeless Prevention. Emergency accommodation is a vital service required to meet people's immediate and urgent need for accommodation. But it is possible to stop homelessness from happening in the first instance. The moratorium on evictions is a prime example of a homeless prevention measure that successfully reduced family homelessness in Ireland. Increased funding and planning is required to implement nationwide homeless prevention measures post Covid. State interventions and prevention strategies work and need to be prioritised if we are to eradicate homelessness in Ireland. Committee members will be aware that, as part of our work in this area, we developed the Simon Homeless Prevention Bill that has received significant cross party support.
- **Housing First Targets:** As set out below SCI welcome the continued commitment to Housing First in Housing for All. However we do believe that there is both the need and scope for greater ambition in the West and South West.

- **HAP Rates and discretions of local authorities:** The committee will be aware of SCI's quarterly snapshot report 'Locked Out of the Market'. The findings of the latest report and the series of reports highlights the critical shortage of affordable accommodation in the private rental market. The runaway inflation in the cost of housing has led to a situation in which individuals and families have little option but to "top-up" the HAP payment in order to secure a home. This is increasingly unsustainable and the HAP rates and discretion of local authorities have to be addressed as a matter of great urgency.

## SCI Commentary on Recommendations

### **Recommendation 1. Consideration be given to extending the moratorium on evictions following the lifting of the 5km travel restrictions.**

Evictions are a key driver of homelessness. The termination of tenancies leaves people with no feasible housing option, increasing the risk of homelessness as a result, sometimes for extended periods. Protective measures for renters implemented during the Covid-19 pandemic had a clear impact in reducing family homelessness. The moratorium on evictions, when implemented, saw a drastic fall in homelessness while exits from homelessness remained steady, indicating that people were successfully prevented from entering homelessness during this time (see appendix). Take falls in family homelessness as an example. Family homelessness fell by well over a third (38%) in the Dublin region in November 2020 when compared to November 2019. Figures from the Department of Housing 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.. State interventions and prevention strategies work.

From April 23rd 2021, contrary to the recommendation of the Committee, the 5km rule on non-essential travel was lifted and with it the moratorium on evictions. This corresponded with a national increase in the number of Notice of Termination reported by the RTB (352 in Q1, 841 in Q2, and 887 in Q3 of 2021). This rise in evictions occurred despite additional protections provided in the Planning and Development, and Residential Tenancies Act 2020 for tenants who had fallen into rent arrears due to COVID-19, and were at risk of losing their tenancy. Protections – which expired on January 12 2022 – included a rent freeze and an increased 90-day notice period when ending a tenancy.

There are now no major protections for renters who have been affected by the Covid-19 pandemic. This is of considerable concern given the rise in homelessness in the latter half of 2021. While extending the moratorium on evictions would be a hugely positive step, SCI have argued for the provision of legislative change that would provide a long-term measure to protect renters from homelessness.

SCI was pleased to see the Simon Bill (Residential tenancies (Amendment) (Extension of Notice Periods) Bill 2021) pass second stage in Dáil Éireann<sup>1</sup> and we urge the Government to ensure its legal

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<https://www.oireachtas.ie/en/bills/bill/2021/159/?highlight%5B0%5D=residential&highlight%5B1%5D=tenancies&highlight%5B2%5D=amendment&highlight%5B3%5D=extension&highlight%5B4%5D=notice&highlight%5B5%5D=periods&highlight%5B6%5D=bill&highlight%5B7%5D=2021>

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 determine a person or family are ‘at risk of homelessness’, the amendment will trigger an extension in the notice period for that household to allow time 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 2. The Department of Housing, Local Government and Heritage liaise with the Department of Health and ancillary health providers to ensure that there are no barriers to service for those with dual diagnoses of addiction and mental health difficulties and to ensure that the client-centred approaches, in particular rapid access to methadone treatment if requested, identified as successful during the pandemic, are retained.**

The silver-lining of the Covid-19 pandemic was the cross-departmental co-operation and urgency seen nationwide to protect and support those most vulnerable in our society. SCI’s 2021 research report *Sustaining the Accelerant?*<sup>2</sup> looked at the effect of the pandemic on front-line workers and service users experiencing homelessness. Positively, in some areas, the increased availability of in-reach medical and health services allowed services users to engage more fully with the services, while on other regions online and phone consultations continued:

- The sustained availability of methadone and benzodiazepine maintenance has meant that for some service users their addictions have become more manageable.
- The very low levels of Covid infection and associated fatality amongst rough sleepers and users of emergency shelters throughout the pandemic was due to their early recognition as a high-risk group for COVID-19, and the expansion and acceleration of services put in place by homelessness NGOs working together with statutory bodies.
- Liaison with the HSE, GPs and Local Authorities, as well as proactive stances taken by organisations and their staffs, led to much higher than expected uptake of vaccinations for both service participants and staff.

Additional SCI research which looked more closely at the direct experience of service users found Flexible, intensified, and person-centred health-related supports developed during the pandemic positively affected people experiencing homelessness within our services. *Housing for All* commits to building on existing health supports and strengthening models of care for people experiencing homelessness (actions 3.10 -3.14). SCI look forward to their speedy implementation. We note that some actions are due to be implemented as soon as Q2 of 2022:

- **3.12. Finalise a model of health care for people experiencing homelessness, including a health / vulnerability assessment tool to assist in determining suitability for Housing First and level of support needed (Q2 2022)**

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<sup>2</sup> [https://www.simon.ie/wp-content/uploads/2021/09/Simon\\_Sustaining\\_the\\_Accelerant.pdf](https://www.simon.ie/wp-content/uploads/2021/09/Simon_Sustaining_the_Accelerant.pdf)

- **3.14.** Expand the case management approach for homeless people living with drug or alcohol addiction and enhance treatment options **(Q2 2022)**

As we recover from the pandemic, SCI hope to see health focussed policies implemented, with sufficient resources to ensure their success. These delivering Frontline services are most keen to see more seamless integration between Mental Health and Drug Services for clients with complex needs.

**Recommendation 3. The Housing First initiative be significantly expanded and for targets to be revised annually in a Housing First Needs Assessment. Further, for the Housing First scheme to ensure that single people with overnight access to their children are provided with two-bedroom accommodation.**

The publication of the 2022-2026 Housing First National Implementation Plan was a positive step towards expanding Housing First tenancies and supports in Ireland. Under the plan, 1,319 supported tenancies are to be delivered over five years. We would note that the targets set for the South West and West, areas where Simon Communities are engaged in the provision of Housing First are less than those delivered in the previous plan. We would welcome more ambition in this area. We note that there is no mechanism to review targets annually but there is a commitment to a review in 2024. This may be an opportunity to review these targets

One of the ongoing challenges in the provision of Housing First in the experience of Simon Communities on the ground is that there is little to no flexibility when it comes to accessing two bedroom properties for Housing First tenants. This can be so where compelling cases can be made based on the circumstances of the prospective tenant and where one bed units cannot be found simply because few if any such one bed units are on the market.

Our experience is that Local Authorities would like to have greater discretion in this area. One-bedroom properties are in chronically short supply, particularly outside of the Dublin region. We do acknowledge that *Housing for All* commits to underpinning the Housing First programme with the delivery of additional one-bed properties (Action 3.5). However, given the chronic need, until we see the delivery of one bed units increasing, the restriction to one bed properties for the Housing First remains a barrier to rapid delivery and successful outcomes.

**Recommendation 4. The maximum discretionary uplift seen in the HAP allowance utilised in Dublin local authorities be expanded to local authorities in other counties where necessary to meet housing needs, particularly for single-person households.**

There have been no changes nationwide to the standard or discretionary HAP rates since the publication of this committee's recommendations in April 2021, or indeed for many years. The €550 maximum allowable for a single person in Cork City (or 660 with 20% Maximum discretion) is in place since 2016 but the average rent for a one bedroom apartment in Cork City Centre now stands at over €1,500 compared to an already expensive €850 in 2016 (Ref Locked Out Reports 2016 and 2021). Lack of affordable rental accommodation for people in sudden need of finding new accommodation has been a key driver of homelessness.

SCI's latest *Locked Out of the Market*<sup>3</sup> snapshot study highlights the lack of properties around the country affordable within standard or discretionary HAP limits. December 2021 saw the majority of

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<sup>3</sup> <https://www.simon.ie/e-publication/locked-out-of-the-market-december-2021/>

properties available within HAP limits predominantly located in Dublin. In fact, 80% (118) of all HAP properties (148) across the 16 study areas were located in the three Dublin areas (Dublin City Centre, Dublin City North, and Dublin City South). In 5 of the 16 study areas, there were no properties available to rent in any household category within standard or discretionary Rent Supplement/Housing Assistance Payment HAP limits. Those areas were Athlone, Galway City Suburbs, Limerick City Centre, Sligo Town, and Portlaoise.

Single people are still in particular need of affordable housing. Of the 148 properties available across the 16 areas during the study period, only four locations (Dublin City North, Dublin City South, Dundalk, and Waterford City Centre) had properties (one-bedroom units) within standard HAP limits for single people. Two of these properties were available within the standard HAP limit, and an additional six properties were available under discretionary HAP limits for single people. This is concerning considering single adults represent 53% of all those homeless in Ireland.

Given the continuous rising cost of rent, both standard and discretionary HAP rates need to be locally re-assessed. Current HAP rates do not adequately meet the levels of cost associated with private rental accommodation across the country, particularly outside of Dublin. As an interim measure while the provision of affordable and social housing increases, SCI has called for increases of standard HAP rates to reflect changes in market rents since 2016 and an expansion of the 50% discretionary HAP rate for all areas outside of Dublin. Such financial support is necessary while affordable accommodation is in short supply to prevent homelessness and support move on.

#### **Recommendations 5 and 11 relating to the standards within homeless services**

- **Recommendation 5. HIQA be appointed to conduct independent statutory inspections and monitoring in all homeless services.**
- **Recommendation 11: The National Quality Standards Framework be applied to all services for all people who have become homeless as was originally intended, including to privately-operated Emergency Accommodation that is in receipt of public funds.**

In 2019, the DRHE launched its National Quality Standards Framework (NQSF) for homeless services, a document outlining the supports that homeless services should offer people and the rights they should enjoy. The NQSF for homeless services was due to be rolled out nationally over a 12-month period from the 1st July 2019. This was put on hold due to Covid-19, but is expected to commence again shortly.

Simon Communities across Ireland do not run privately operated emergency accommodation, but we do believe that all people experiencing homelessness deserve the highest standard of care possible and deserve the same standard that is applicable in all services.

**Recommendation 6. The Department of Housing, Local Government and Heritage engage with the Department of Social Protection to raise awareness of the harmful effects, such as in cases of people experiencing addiction, that can result from the double payment of social welfare in some cases and to implement procedures to support clients who might want to mitigate against this.**

During the Covid-19 pandemic – in a bid to restrict unnecessary movement and curb the spread of the virus – weekly social welfare payments were changed to a fortnightly schedule from 23 March 2020. The measure was kept under constant review, and the Department of Social Welfare began to

move most payments back to their weekly schedule starting in August 2020, with all payments now reverted back to their original schedule pre-pandemic.

SCI does not believe that a person's social welfare payment should be policed based on history of addiction. We do, however, recognise that clients may be in need of additional support when it comes to financial management including people in addiction or people at risk of financial abuse. For those who require such financial support, clear pathways to support within the Department of Social Protection that will allow people to create an individualised payment plan that mitigates against harm would be very welcome. In the case of emergency double payment measures – such as during the Covid pandemic – those who are vulnerable with large sums of money should be worked with and maintained at a weekly payment if suitable.

For those in homelessness struggling with addiction, SCI believes the correct response is the provision of support that includes the promotion of Harm Reduction practices, increased access to counselling and mental health care, and support for detox centres. Such supports – that can prevent problematic drug use causing harm or premature death – need to be regularly available for people experiencing and at risk of homelessness.

**Recommendation 7. An agreed methodology be introduced between the HSE, the Department of Housing and the Dublin Regional Homeless Executive, for recording the deaths of people experiencing homelessness or people accessing homeless services, and to agree what procedures are put in place by all relevant service providers to ensure that there are adequate Adult Safeguarding Reviews of such deaths.**

Simon Community services continue to follow protocol in informing the HSE and the Local Authority of any deaths in services and support the analysis of untimely deaths for people experiencing homelessness.

**Recommendation 8. The Department of Housing, Local Government and Heritage liaise with local authorities, homeless service providers, and the HSE to ensure the funding and roll out of trauma-informed practice for all those providing frontline supports to people at risk of or experiencing homelessness, in accordance with health and safety obligations.**

Frontline workers supporting homeless people in Ireland are in need of great support. Embedding Trauma Informed Care into our practice is key in SCI, but accessing mental health care or additional training is not happening in any systematic or structured way. IN the case of the Simon Communities a lot of the support provided to staff is organised and arranged internally.

In Cork Simon (as an example), using their own resources they offer three counselling sessions to all staff each year, they established a Trauma Informed Care Working Group, have undertaken and external audit of its trauma awareness and implemented recommendations to improve same and have funded and delivers their own trauma-informed care training events as well as participating in events organised via the Local Authority

We do note that without sufficient levels of staff, ongoing training, and regular mental support, people working on the front-line run the risk of burnout as well as mental and physical stress.

**Recommendation 9. The Department of Housing, Local Government and Heritage set annual targets for Local Authorities for the provision of various house types with particular reference to one- and two-bed housing units via the Repair and Lease scheme.**

There continues to be a particular shortage of affordable, one-bedroom properties suitable for single people which is marked by an overrepresentation of homeless single adults (53% of all homelessness in December), and single households in need of social housing support (52% of all household types)

As mentioned, SCI's *Locked Out of the Market*<sup>4</sup> snapshot studies continuously show a lack of housing across the country affordable within HAP limits, with only 4 of the 16 areas studied providing one-bedroom properties within HAP limits for single people (Dublin City North, Dublin City South, Dundalk, and Waterford City Centre).

Housing for All's action 3.8 commits to 'Issue guidance to Local Authorities on their Homeless Action Plans' has been completed according to the policy's Q4 progress report.<sup>5</sup> The forthcoming Development of local Homeless Action Plans provides an excellent opportunity for the Department of Housing to work with Local Authorities in setting annual targets targeted Housing provision.

In relation to utilising the Repair and Lease scheme, SCI supports the restoration and revitalisation of vacant and derelict properties. However, the revitalisation of these properties needs to provide a housing stock that is both targeted to local need and is affordable. Without affordability, properties revitalised under the repair and lease scheme will not help prevent or lift people out of homelessness.

**Recommendation 10. Inspections of emergency accommodation for homeless people which were suspended due to COVID-19 be resumed immediately.**

Within SCI, inspections planned have been postponed due to Covid-19. SCI supports the return of these inspections to ensure there is a high-standard of care for people accessing services.

**Recommendation 12: In all instances where the provision of accommodation for people who have become homeless is being sought, NGOs and not-for-profit organisations should be permitted to tender to provide this accommodation.** We agree that new emergency or long term accommodation for homeless people is best delivered by experienced homeless services organisation rather than by for-profit private operators. We are not convinced that competitive tendering, open to such private sector operators, is the best approach to commissioning such services.

**Recommendation 13, 15, and 17 relating to emergency accommodation without supports:**

- **Recommendation 13: The use of Private Emergency Accommodation be quickly phased out and replaced with Supported Temporary Accommodation, Housing First and appropriate long-term housing.**
- **Recommendation 15: The Minister, in conjunction with homeless service providers, phase out the involvement of private security firms in emergency homeless accommodation and provide a timeline for doing so.**

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<sup>4</sup> <https://www.simon.ie/e-publication/locked-out-of-the-market-december-2021/>

<sup>5</sup> <https://www.gov.ie/en/publication/84e61-housing-for-all-q4-2021-progress-report/>

- **Recommendation 17: Dedicated wrap around supports including social, health and housing supports be provided to users of privately-operated homeless services.**

Private Emergency Accommodation (PEA) continues to dominate accommodation used to support homeless people in Ireland. In the 12-month period between December 2020 and December 2021<sup>6</sup>, the number of people accommodation in PEA increased by 257, although this did represent a slight decrease in the total percentage (53% down from 54%). Along with this, the number of people staying in Temporary Emergency Accommodation (TEA) stayed largely the same, with 121 seen in December 2021 compared to 125 in December 2020.

Accommodation Type	Dec-21	% of Total	Dec-20	% of Total	Annual Difference
PEA	3470	53.14%	3213	54.39%	+257
STA	2936	44.96%	2567	43.46%	+369
TEA	121	1.85%	125	2.12%	-4
Other	3	0.05%	2	0.03%	+1

Table 1: Accommodation Types. December 2021 vs December 2020

**Recommendation 14: The Minister, in conjunction with local authorities and homeless service providers, develop a plan to ensure an adequate supply of emergency accommodation in all Local Authorities in areas where it’s needed in order to reverse the over-concentration of homeless facilities in places such as Dublin Central.**

The development of Homeless Action Plans currently at differing stages across the country would provide an opportunity to undertake such a review.

**Recommendation 16: Key workers/housing support workers be assigned to all people experiencing homelessness.**

A number of the Simon Communities across Ireland are making the case for increased key worker and prevention workers.

<sup>6</sup> <https://www.gov.ie/en/collection/80ea8-homelessness-data/>