



No One Left Behind

Pre Budget Submission 2018

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Introduction

In October 2016, we welcomed the announcement of an additional €28 million in homelessness specific funding as part of Budget 2017. Despite this, in 2017 the housing and homelessness crisis has continued unabated impacting every region and community around the country. According to the most recent data available, 7,941 people are currently living in emergency accommodation, including 3,206 adults without dependents in their care and 1,365 families composed of 1,840 adults and 2,895 children. The recently published ‘*Census 2016 – Homeless Persons in Ireland*’ report shows that 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. This is in addition to the many thousands of households living in precarious tenancies experiencing ongoing housing instability. Despite the coordinated response outlined in 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. Crucially, households currently trapped in emergency accommodation must be supported to leave homelessness behind. In addition, we need where possible to keep people in their homes preventing homelessness from happening in the first place. This submission will address the policy and budgetary measures that must be taken to meaningfully address the housing and homeless crisis, ensure increased and continued access to adequate social protection and employment supports in addition to the delivery of vital services to cater for the complex health needs of people experiencing or at risk of homelessness. These measures will be advanced from the perspective of the Simon Communities three critical priorities for Budget 2018:

- Priority 1:** Preventing homelessness and keeping people in their homes
- Priority 2:** Rapid access to affordable, safe and secure housing and prioritisation for people experiencing long term homelessness.
- Priority 3:** Support in housing.

The continuous increases in the number of individuals and families in emergency accommodation needs to be addressed urgently. Comprehensive early intervention and prevention measures are required to keep those at risk of homelessness in their homes and to alleviate the precariousness of their tenancies. Strategic investment is required to increase housing supply. Access to social and affordable, safe and secure housing for all, particularly for those at risk of homelessness or those attempting to exit homelessness. New social housing construction is of paramount importance in this regard in addition to the review and enhancement of vital State housing payments.

People experiencing homelessness are not a homogenous group. They are a diverse group of people that include women, young men and women, families, those with complex mental and physical health needs and people with problematic drug and alcohol use. Understanding this diversity and individuals’ unique pathways into and experiences of homelessness is crucial to ensure we can respond to their individual and complex needs. People experiencing homelessness must be provided with adequately resourced, flexible and ongoing supports. The support offered needs to incorporate the three dimensions of housing support, clinical support and supports towards community reintegration, as necessary.

These priorities will be addressed in greater detail below by outlining key budgetary measures, that if resourced and implemented in full, can provide working solutions to end long term homelessness and the underlying social inequality that perpetuates this growing crisis. To meaningfully tackle this unprecedented crisis and to prevent its recurrence, we must do things differently. Underpinning our submission, the Simon Communities firmly believe that 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 housing policy, decision making and budgetary

allocation. A necessary first step in delivering adequate housing for those with the greatest need is putting Housing First at the forefront of State efforts to end long term homelessness.

Homelessness and Housing Insecurity – a nationwide crisis

According to the European Typology of Homelessness and Housing Exclusion (ETHOS) as developed by FEANTSA, homelessness includes rooflessness (being without shelter of any kind, sleeping rough); houselessness (with a place to sleep but temporary in institutions or shelter); living in insecure housing (threatened with severe exclusion due to insecure tenancies); and living in inadequate housing (in caravans on illegal campsites, in unfit housing, in extreme overcrowding).¹ The complexity of the ongoing homelessness crisis can be captured within this broad typology. People become homeless for a whole range of complex and overlapping reasons. The underlying causes of homelessness include poverty, inequality and a lack of affordable housing, often coupled with systems failures and individual circumstance. Many of the people the Simon Communities work with every day have often been disadvantaged and isolated from a young age; they have been failed by the state time and time again. Homelessness can happen as the result of a crisis or an accumulation of crises in a person's life. It can build up over time, sometimes years and can have a lasting impact on a person's mental and physical health and their overall wellbeing.

The housing crisis is the primary barrier to solving long term homelessness and ending the use of emergency accommodation as the State's primary response to homelessness. The failure to deliver affordable housing through strategic Local Authority social housing construction has been a leading cause of homelessness and a major impediment to exiting homelessness for low income households. New social housing construction has again been tied to the private construction sector which saw social housing output plummet by 92% with the onset of the financial crisis in 2008.² As such, new social housing construction is stuck in a cycle mirroring the boom bust dynamics of the private housing system.³ As private housing construction stutters to recover the state has turned to the overburdened private rented sector for the provision of new social housing tenancies, heavily subsidised through the Housing Assistance Payment (HAP) and Rent Supplement (RS) Schemes. However, as private market rents spiral upwards and supply falls to historic lows these payments are becoming increasingly ineffectual leaving recipients locked out of a crowded and increasingly competitive market, increasing their risk of entering or re-entering homelessness. The recent Simon Communities *'Locked Out of the Market VIII'* snapshot study revealed that 91% of rental properties in 11 study areas nationwide were beyond the reach of those depending on RS and HAP payments for their housing.⁴

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

¹ FEANTSA, *'Ethos Typology on Homelessness and Housing Exclusion'*, <http://www.feantsa.org/en/toolkit/2005/04/01/ethos-typology-on-homelessness-and-housing-exclusion>.

² Norris M, Byrne M, *'Social housing's role in the Irish property boom and bust'*, P- 16-17, 2016, UCD Geary Institute for Public Policy Discussion Paper Series, <http://www.ucd.ie/geary/static/publications/workingpapers/gearywp201615.pdf>.

³ Ibid.

⁴ Simon Communities in Ireland, *'Locked Out of the Market VIII – The Gap between Rent Supplement and Hap Limits and Market Rents'*, August 2017, <http://www.simon.ie/Portals/1/EasyDNNNewsDocuments/171/Locked%20Out%20of%20the%20Market%20VIII%20Report.pdf>.

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.⁵ Often people who are homeless are deprived of other basic human rights on top of their right to adequate housing.⁶ 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.

Housing First

Improved outcomes for people experiencing homelessness

The 2013 Homelessness Policy Statement marked the Government's first policy commitment to pursue a housing-led⁷ approach to solving long term homelessness.⁸ 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 First⁹ approach - immediate provision of housing without pre-conditions or no requirement 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. 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.

⁵ Padraic Kenna, 'National Perspectives on Housing Rights – Ireland', P.6, <https://www.nuigalway.ie/media/housinglawrightsandpolicy/National-perspectives-on-housing-rights.pdf>.

⁶ Ibid Pp. 21-23.

⁷ The terms Housing First and Housing Led are often used interchangeably for the purpose of this document we use the term Housing First.

⁸ DECLG, Homelessness Policy Statement, 2013,

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

⁹ 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 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 interventions⁹. 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.

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”¹⁰, however in the absence of the local and national political and financial commitment to Housing First we 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.¹¹

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.¹² In Dublin, O’Donoghue-Hynes (2015)¹³ found that from 2012 to 2014, of the 7,254 people that used emergency accommodation just 13% (924) could be considered long stay¹⁴ shelter residents. However this group accounted for 52% of emergency bed nights.¹⁵ Remarkably, 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.

Better quality of life outcomes - Reduced health care costs

Reductions in the use 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 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.¹⁶

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.¹⁷ 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.¹⁸ In Finland, a study of a supported housing unit

¹⁰ Eoin O’Sullivan, ‘Ending Homelessness – A Housing-Led Approach’, P. 24, <http://www.drugs.ie/resourcesfiles/reports/EndingHomelessness.pdf>.

¹¹ Nicholas Plead 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_ib.pdf.

¹² Ibid 11, P. 23.

¹³ 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

¹⁴ Long Stay* or chronically* homeless according to typologies developed by *Aubrey et al (2013) Kahn and & Culhane (2004)

¹⁵ Total number of emergency bed-nights available” is the total number of emergency beds available in a given period.

¹⁶ Hewett N, Halligan A, Boyce T. A general practitioner and nurse led approach to improving hospital care for homeless people. *BMJ*. 2012;345:e5999.

¹⁷ Nicholas Plead, European Observatory on Homelessness/FEANTSA, ‘Housing First’, P. 22, http://www.feantsaresearch.org/download/housing_first_plead3790695452176551843.pdf.

¹⁸ 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>.

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.^{19,20} 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.²¹

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.²² 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 300 tenancies by years end. The Repair and Lease and Buy and Renew schemes focusing on vacant/empty homes 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. We call for the full delivery of this commitment in 2018.

Affordable Housing Supply

The review of *Rebuilding Ireland* must critically assess implementation to date exploring both progress made and crucially targets that have not been reached since the publication of the plan in July 2016. Importantly, this review also 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. We know that 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 define 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

¹⁹ Ministry of the Environment (2011) Asunnottomuuden vähentämisen taloudellisetvaikutukset. Helsinki: Ministry of the Environment.

²⁰ Ibid 11, P. 30.

²¹ Calgary Homelessness Foundation, *The Cost Benefits of Housing First*, <http://calgaryhomeless.com/wp-content/uploads/2014/06/The-Cost-Benefits-of-Housing-First.pdf>.

²² 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_Quarterly_Progress_Report_RBI_31_May_2017%20(5).pdf).

Ireland and to the executives of foreign companies considering Ireland as a location".²³ This is supported by Goodbody stockbroker's latest quarterly Irish Economy Health Check which highlights capacity constraints in the area of housing and infrastructure.²⁴

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 2014²⁵ and the Nevin Economic Research Institute (NERI) in 2017²⁶. 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).

²³ 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>.

²⁴ <http://www.rte.ie/amp/895865>.

²⁵ 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

²⁶ Healy, T & Goldrick-Kelly, Paul (2017) *Ireland's Housing Emergency - Time for a Game Changer* <https://www.nerinstitute.net/research/irelands-housing-emergency-time-for-a-game-changer/>

Budget 2018 – Simon Communities Critical Priorities

In 2016 we welcomed the publication of *Rebuilding Ireland* as a coordinated, cross-sectoral and cross-departmental approach to tackling the ongoing housing and homelessness crisis. Similarly, the announcement of Budget 2017 in October last was greeted with enthusiasm in light of increased funding for vital homelessness services, marginal increases across social protection payments and increased funding for vital health and mental health services. Budget 2018 presents an opportunity for Government to critically assess, analyse and evaluate progress in addressing the housing and homeless crisis and the ideology underpinning this government's *Rebuilding Ireland* strategy. This critical analysis must also extend to the broader policy and budgetary commitments announced as part of Budget 2017. This assessment should examine progress achieved to date and the targets that have not been reached. This assessment must be cognisant of changing budgetary and economic realities and should seek to direct maximum available resources towards the implementation of current *Rebuilding Ireland* targets and budgetary commitments and where possible expand and revise these targets upwards. Solving this crisis requires cross-departmental resources and support from key Government Departments including Housing, Finance, Public Expenditure and Reform, Social Protection, An Taoiseach and Health/HSE. In this regard the Simon Communities call for action on three fronts in Budget 2018 to achieve the Government's goal of solving the housing and homelessness crisis.

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| Priority 1: | Preventing homelessness and keeping people in their homes |
| Priority 2: | Rapid access to affordable, safe and secure housing and prioritisation for people experiencing long term homelessness. |
| Priority 3: | Support in housing. |

Priority 1: 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. Funding for existing prevention measures such as the Tenancy Protection Service must be ring fenced to ensure their continued viability and impact. 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.

Overarching Recommendation:

- *National Homeless Sub-Strategy*: A new cross-departmental National Homelessness Sub-Strategy under the auspices of *Rebuilding Ireland* is required with ring fenced funding for implementation. This sub-strategy would complement and build upon existing commitments contained in *Rebuilding Ireland* including prevention, nationwide implementation of Housing First and addressing multiple and complex needs. This strategy should acknowledge that people experiencing homelessness are not a homogenous group and that a broad spectrum of diversity exists regarding people's experiences of homelessness focusing on homelessness amongst single people; families; women; young people and drug/alcohol users.

Rent Supplement/HAP limits

The most effective way to prevent homelessness is to increase availability and access to affordable housing.²⁷ An increasing number of people are entering homelessness from the private rented sector. Spiralling rents and historically low supply has created a competitive and crowded market place rendering State housing payments increasingly ineffectual. In 2018, 17,500 new HAP tenancies are to be created. Budgetary allocation for the delivery of these tenancies and the maintenance of existing HAP tenancies must be cognisant of rising private market rents and chronic low supply, factors that can severely impact on the availability and sustainability of social housing tenancies. In the absence of social housing provision and to ensure the effectiveness of RS/HAP payments we encourage the Government to consider the following recommendations.

Recommendations:

- Increased budgetary allocation is required to allow for bi-annual monitoring and adjustment of RS/HAP limits to ensure alignment with rising private market rents.
- Community Welfare Officers and Local Authorities must be fully resourced to make urgent discretionary uplift payments under RS and HAP schemes. 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.
- Single people and couples should be specifically targeted given the disproportionate negative impact inadequate RS/HAP limits are having on these households' ability to access affordable housing.
- With the termination of a HAP tenancy, the onus should be on the Local Authority to find appropriate, alternative housing options as with RAS tenancies in the past. This should not be the responsibility of hard pressed, stressed households that may have varying financial and personal capacity to do so.

²⁷ 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>.

- Review the policy approach that determines a household's social housing need met once in receipt of HAP. In the absence of sufficient security of tenure in the Private Rented Sector this approach does not reflect the perilous reality of many HAP tenancies.

Funding for current and future prevention measures

The launch of the *Abhaile* 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. However, additional early intervention and prevention measures are required given the sheer scale of the crisis.

Recommendations:

- Expand the scope of funding under Section 10 of the Housing Act 1988 to support those who are at risk of homelessness to help sustain tenancies in addition to providing rapid re-housing so that a person's experience of homelessness is ended as quickly as possible. This funding is currently restricted to assisting those who have experienced homelessness. This legislative change should be prioritised in conjunction with the development of the aforementioned sub-strategy.
- Make funding for information and advice services fully available to provide much needed advice to households to remain in their homes. As needed, additional funding should be allocated to maintain the *Abhaile* service beyond 2019 to assist current and future homeowners struggling to cope with mortgage arrears.
- 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.
- Expand the Homeless HAP scheme nationally. This scheme currently supports 1,711 households who have moved out of emergency accommodation into stable tenancies as of July 2017.^{28,29}

Adequate Social Protection Supports

Measures must be taken as part of Budget 2018 to address the income adequacy and equitable access of all social protection supports. Such measures would be consistent with progress towards the national social target for poverty reduction³⁰ 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.³¹

Recommendations:

- We encourage the current Minister for 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 legislation.³²
- State budgets should progressively bring welfare payments above the poverty line which currently stands at €235.73 per week for a single person.³³ In the interim period, Budget 2018 should increase social welfare rates by €5 per week restoring to pre-cuts level of €204 per week in Budget 2019.

²⁸ Dáil Éireann Debate, Vol. 927 No. 3, <http://oireachtasdebates.oireachtas.ie/debates%20authoring/debateswebpack.nsf/takes/dail2016110800064>.

²⁹ The Housing Assistance Payment for Homeless Households or Homeless HAP Pilot, which is operated by the Dublin Region Homeless Executive (DRHE) on behalf of the Dublin local authorities, provides discretion to exceed the HAP rent limits for homeless households, if this is necessary in order to source suitable accommodation. To qualify for HAP under the pilot scheme, a household must be accepted as homeless within the meaning of section 2 of the Housing Act 1988 by one of the 4 Dublin local authorities.

³⁰ Department of Social Protection, 'Social Inclusion Monitor 2015 – National Social Target for Poverty Reduction', P. 18, <https://www.welfare.ie/en/downloads/SocialInclusionMonitor2015.pdf>.

³¹ Ibid, at P. 34.

³² <https://www.irishtimes.com/news/ireland/irish-news/social-welfare-to-be-linked-to-inflation-under-varadkar-plan-1.2729649>.

³³ Social Justice Ireland, 'Socio Economic review 2017', P. 48, <https://www.socialjustice.ie/sites/default/files/attach/publication/4784/socioeconomicreview.pdf>.

- The reduction of personal rent contributions for those in receipt of Jobseekers Allowance as of January 2017 is welcome. Personal rent contributions should be monitored and reduced further for these 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. There should be equity of social welfare rates for all eligible jobseekers.
- 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.
- Remove prescription charges for people who are homeless.

Mortgages in Distress:

According to the most recent figures from the Central Bank, over 76,000 principle dwelling mortgage accounts are in arrears. Forty-three percent of all mortgage arrears are in arrears for over 720 days. Additionally, at the end of March 2017, 20,009 or 16% of buy-to-let mortgages were in arrears of more than 90 days. Key legislative mechanisms to address mortgage arrears remain underused. A prime example is the Mortgage write down mechanism under the personal insolvency legislation that potentially allows for the write-down of the debt on the family home to its current market value, allowing the borrower to remain the owner.

Recommendations:

- Continued investment in the recently amended Mortgage-to-Rent scheme is required to ensure its future viability.
- Fully resource Approved Housing Bodies (AHB's) to engage with the Mortgage-to-Rent scheme to increase national coverage to provide the services required under the scheme. In the interim period, alternative options must be put in place for those living in areas with little or no AHB coverage.
- Additional resources must be available to implement the commitments contained in the Programme for Partnership Government including a review of the thresholds and processes for Personal Insolvency Arrangements; the establishment of a dedicated mortgage arrears courts service; and the amendment of the Code of Conduct on Mortgage Arrears to include an obligation on mortgage providers to provide sustainable arrears solutions.
- Greater use of Mortgage write-down must be encouraged amongst mortgage providers.

Priority 2: Rapid access to affordable, safe and secure housing and prioritisation of people experiencing long term homelessness

In 2016, we welcomed the announcement of an additional €28 million for the homelessness and emergency accommodation budget, bringing total expenditure to nearly €100 million. This increased funding is intended to assist over 3,000 households to move out of Emergency Accommodation in 2017 through Rapid Build Housing (RBH) and HAP. Given RBH targets are significantly behind schedule we are concerned that this target may not be met or possibly will be transferred in its entirety to HAP, adding considerable strain to the already overburdened Private Rented Sector. The commitment to triple Housing First tenancies to 300 tenancies by the end of 2017 is welcome. The identification of the next 50 Housing First tenants by the DRHE is a welcome development as is the broadening of the initiative to include people currently being accommodated in Supported Temporary Accommodation as well as entrenched rough sleepers. The Repair and Leasing and Buy and Renew schemes are possibly the most suitable means of securing sustainable housing options to deliver current and future housing first tenancies. People need the security and safety of their own home. Addressing other issues or problems a person or family may be experiencing in their lives is much more effective when people have a place to call home. Measures can be taken in Budget 2018 to improve access to affordable housing options for people experiencing homelessness, at risk of homelessness and for low and middle income households. These measures are outlined below.

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.³⁴ We know that 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. It is essential to extend Housing First targets nationally beyond the 300 tenancies committed to by the end of 2017.

Recommendations:

- Budget 2018 should provide resources to establish a National Housing First programme with published tenancy targets for its national roll out.
- Adequate funding across relevant Government Departments is required to ensure the expansion of Housing First with the necessary wraparound support. Critical departments include the Department of Health/HSE, Department of Social Protection and the Department of Finance.

Emergency Accommodation:

Historically, emergency accommodation has formed the basis of State's response to the housing and homelessness crisis. The use of private hotels, B&B's and emergency shelter beds fails to address the complexity of homelessness effectively. The diversity of experience and complexity of need of people living in emergency accommodation is not adequately addressed, acting as a barrier in accessing vital mental health services, primary health care facilities and drug and alcohol treatment and detox programmes. This lack of holistic supports runs contrary to a Housing First approach and can lead to the further institutionalisation of people living in emergency accommodation.

³⁴ DHPCLG, Homelessness Policy Statement, February 2013, <http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Housing/FileDownload%2C32434%2Cen.pdf>.

Recommendations:

- Emergency Accommodation should only ever be used in the short term – ideally averaging no more than 7-10 days. Similarly, Family Hubs must only be used in the short term with a three month time limit. On entering emergency accommodation or a Family Hub, households must be immediately supported to source and maintain a tenancy in the wider community.
- A five-year plan should be put in place aimed at reducing the time spent in emergency accommodation to an average of 7-10 days per person. This should be part of the aforementioned sub-strategy.
- The average length of stay per person/family in emergency accommodation and hubs should be reported quarterly and subject to agreed reduction targets for the following year.
- Ensure funding for emergency hotel rooms and B&B's must be additional to the homeless budget (Section 10 funding) and ring-fenced so funding is not diverted from Housing First services and other homeless services that are already stretched to capacity.
- There is a need for ring fenced funding for specialist voluntary services such as Homeless Action Teams to ensure appropriate visiting and on-site support is provided to those in private emergency accommodation, Family Hubs and longer term sustainable tenancies on exiting homelessness.

Social Housing Supply:

Investment in social/public housing must become a budgetary priority of the State and the European Union. It is essential that Local Authorities get back into the business of building and acquiring social housing on the scale required to meet ever-growing housing need with the support of Approved Housing Bodies (AHB's). Direct build social housing presents a far greater return on state investment, and is thus a more cost efficient policy choice than investment in private rental subsidies such as HAP and Rent Supplement. Long term thinking and investment is required. In 2016, 2,204 new social housing units were delivered. This includes 652 newly built social houses funded through the Social Housing Investment Programme (SHIP), the Capital Acquisition Scheme (CAS) and the Capital Advanced Leasing Facility (CALF), and a further 1,552 social houses acquired by Local Authorities. Social housing construction and delivery is not happening quickly enough; the pace must be accelerated to have a meaningful impact on the housing and homelessness crisis.

Recommendations:

- Triple direct capital expenditure funding to €1 billion per annum to enable the rapid building within 16 months of 5,000 additional social housing units by Local Authorities and AHB's.
- There needs to be prioritisation of housing options which can be delivered quickly including rapid builds and vacant/empty homes.
- Local Authorities and AHB's must be resourced to build social housing stock to meet low and middle income households' housing needs. In 2016, only 652 Local Authority built houses were delivered.
- The Government must seek further flexibility from the European Commission on the application of the EU fiscal rules regarding the financing of social housing.
- We support the recommendation proposed by both NESC (2014) and the Nevin Economic Research Institute (NERI 2017) to establish a new semi-state Irish affordable Homes Company with the necessary resources.

Rapid Build Housing:

Rapid Build Housing (RBH) delivery is severely behind schedule. According to the most recent data available only 22 RBH units have been delivered. This is worryingly short of the targeted delivery of 200 units by Q4 2016 and the delivery of a further 800 units by Q4 2017. The latest Rebuilding Ireland Quarterly progress report is a tacit admission that these targets will not be met.

Recommendation:

- Emergency budgetary measures must now be taken to ensure the delivery of Rapid Build Housing targets nationally within the agreed timescales.

Make better use of existing housing stock and voids:

According to Census 2016, there are 183,321 vacant housing units in the State. Urgent and sustained action is required to address this dysfunctional level of vacancy in the Irish housing stock to unlock solutions to the current housing and homelessness crisis. This is the low hanging fruit and could quickly ensure that homes can be provided for those who need them most. It is critical that any measures introduced in this regard are reasonable, targeted, and that relationships required for their implementation are managed sensitively allowing for the balancing of parties respective rights and needs where possible. The 3% levy on vacant sites introduced under the Urban Regeneration and Housing Act 2015 is inadequate given rapidly increasing land prices. The vacant site levy presents no real deterrent to those hoarding vacant development land. A full examination of property vacancy in Ireland can be found in the recent Simon Communities in Ireland report '*Empty Homes: Unlocking Solutions to the Housing and Homelessness Crisis in Ireland*'.³⁵

Recommendations:

- Fast track the implementation of the Empty Homes Strategy once published. It is disappointing that publication has been delayed.
- A vacant property tax should be introduced for homes empty for more than 12 months. Such a tax could be calculated on the basis of property value or potential rental income and increased the longer a property remains vacant. Revenue raised through the vacant property tax could be redirected to fund further vacancy reduction measures and social housing output.³⁶
- Amend the vacant site levy and reduce the number of exemptions available to owners of development land subject to a loan on the property in question. The levy should apply until occupation of the site, and should be implemented immediately.³⁷
- The *Repair and Leasing* and *Buy and Renew* schemes should be reviewed with targets revised upwards and ensure the schemes can attract the greatest number of home owners possible. Allocations under both schemes should prioritise people who are long term homeless.
- Additional resources must be made available to AHB's to assist with the identification of vacant properties and their respective owners. This dual identification process is both time and resource intensive.
- The rent payable to property owners engaged with the *Repair and Leasing* scheme should be increased to 92-95% of market rent.
- Where a vacant property owner chooses not to engage with the *Repair and Leasing* scheme, the viability of purchasing that property under the *Buy and Renew* scheme should be assessed.

³⁵ Simon Communities in Ireland, '*Empty Homes: Unlocking Solutions to the Housing and Homelessness Crisis*', March 2017, <http://www.simon.ie/Portals/1/FINAL%20Empty%20Homes%20-%20Unlocking%20solutions%20to%20the%20housing%20and%20homelessness%20crisis%2001022017.pdf>.

³⁶ This and other measures to make better use of existing vacant housing stock and voids can be explored further in the recent Simon Communities paper '*Addressing empty homes: unlocking solutions to the housing and homeless crisis*', March 2017, <http://www.simon.ie/Portals/1/FINAL%20Empty%20Homes%20-%20Unlocking%20solutions%20to%20the%20housing%20and%20homelessness%20crisis%2001022017.pdf>.

³⁷ Green Party Derelict and Vacant Sites Bill 2017, <http://www.oireachtas.ie/documents/bills28/bills/2017/1617/b1617s.pdf>.

Support Approved Housing Bodies (AHB)/Voluntary Co-operations to access finance:

Approved Housing Bodies are a vital component of the social housing system. The review of social housing delivery as part of the wider *Rebuilding Ireland* review must seek to maximise the input and expertise of Approved Housing Bodies considering their significant track record in the delivery of affordable housing.

Recommendations:

- Increase the Housing Agency capital expenditure funding for the purchase of vacant housing portfolios for the delivery of social housing units by AHB's.
- AHB's/Voluntary Co-Operatives need to be supported to act quickly when opportunities arise. Mechanisms must be explored to improve access to finance, for example review and revision of the Capital Advanced Leasing Facility (CALF) to make it more financially viable.
- There is an urgent need to explore new funding models and mixed funding models including private finance, state funding and AHB's/Voluntary Co-Operatives working in partnership. The proposals made by the Irish League of Credit Unions should be explored further in light of upward lending limits they can make available for the provision of social and affordable housing.
- The Capital Assistance Scheme (CAS) must be resourced and protected as a key mechanism for the delivery of social housing to special needs groups particularly people who are homeless. This should be an open, annual rolling process which would be available to AHB's as opportunities arise.

Private Rented Sector:

Ireland's private rented sector is not working for the vast majority of private renters or recipients of State housing payments. According to the Daft.ie quarter 2 Rental Report, the average nationwide rent now stands at €1,159 per month, up 54% since 2012. Property availability within the private rented sector has plummeted to a record low of fewer than 3,000 properties available to rent nationwide on the 1st of August, down 84% since 2012.³⁸ People who rent have very little security and can face increases in rent that they cannot meet. Many people who are becoming homeless are coming from the private rental sector. They have lost their home and cannot afford to put a roof over their heads. Some stay with extended family and, when that fails, they enter homelessness. Increased rent certainty and security of tenure are the primary means of stemming the flow of people from the private rented sector into a situation of homelessness.

Recommendations:*Rent Certainty and Rent Predictability*

- Full rent certainty is required. Consideration must be given to index linking rents to the Consumer Price Index (CPI). Further research is required to examine the viability of this rent certainty measure in addition to exploring alternative methods of rent certainty successfully employed in other jurisdictions.
- In the absence of full rent certainty, rent predictability must be extended nationwide as a matter of priority to reflect the national scale of the rental crisis. Ongoing monitoring on the basis of local electoral area boundaries is essential to gauge the impact of the measure.
- Allowable rent increases in RPZ's should be restricted to the current 4% per annum. Under no circumstances should allowable rent increases be revised upwards. This position must be central to the ongoing review of the Rent Predictability Measure.
- Active enforcement of the Rent Predictability measure by the RTB is required to ensure compliance within RPZ's. A public awareness campaign is required to provide clarity and to ensure landlords and tenants are aware of the implications and obligations attached to the Rent Predictability measure.

³⁸ Daft.ie, Quarter 2 Rental Report, August 2017, <https://www.daft.ie/report/2017-Q2-rentalprice-daft-report.pdf>.

- A register of current sitting rents is now required to ensure active enforcement, compliance and to combat inflationary rent increases being applied at the commencement of new tenancies.

Security of Tenure

- Fast track the existing commitment to move towards indefinite leasing as a matter of urgency.
- The RTB should closely monitor terminations relying on Section 34 reasons to ensure landlords are acting in good faith and in compliance with the new standards contained in the Planning and Development (Housing) and Residential Tenancies Act 2016.³⁹
- Measures to prevent the simultaneous serving of termination notices on large numbers of residents in a single development should be amended to include cases of simultaneous termination of less than 5 tenancies.
- Tenants of Buy-to-Let (BTL) properties in receivership must have full protection. All landlord obligations should transfer to the receiver and subsequently to the new property owner.
- We support NESCC's recommendations for a simple regime for taxation of rental income, providing clear incentives for long-term investment in the provision of good quality rental homes with secure tenancies.
- Landlords with more than three properties should not be able to invoke Section 34 of the RTA in order to issue notice of termination to tenants.
- Any incentives for landlords must be met with increased conditionality in terms of security of tenure and rent certainty

Tenant Services

- The enhanced rent supplement payment service provided by the Tenancy Protection Service should be rolled out nationally to ensure those who need to access additional rent supplement payments can do so without unnecessary delay. There is a need to set and publish specific targets for the rollout of this service as a matter of priority.
- Amend, commence and implement the Deposit Protection Scheme, which is provided for in the 2015 amendments to the Residential Tenancies Act, immediately.
- To address the issue of unreasonable deposits being requested at the commencement of tenancies legislate for a statutory maximum of one month's deposit and one month's rent in advance to be paid at the commencement of a new tenancy.

Supply

- The commitment to develop a cost rental model needs urgent action and implementation.
- Develop an affordable rental model to provide housing for those who do not qualify for social housing and cannot afford to access housing in the private sector.
- To provide as many affordable housing units as possible Approved Housing Bodies (AHBs) must be fully resourced and supported to engage with the cost-rental and affordable rental models. Tax incentives for cost rental and affordable providers must be considered and linked to conditionality in terms of security of tenure. At a minimum, this should include mortgage interest relief, local property tax deductibility and access to current and future home renovation schemes.
- The 'Build to Rent' model is a positive inclusion in the *Rental Strategy*. The State should seek to acquire further social housing provision through developer contributions similar to Part V social housing contributions.

³⁹ Planning and Development (Housing) and Residential Tenancies Act 2016, P. 46, <http://www.oireachtas.ie/documents/bills28/acts/2016/a1716.pdf>.

Quality Standards

- The introduction of new standards relating to the safety of private rental accommodation are welcome. Enforcement of these new standards by Local Authorities as part of the new shared service approach to inspection of private rented accommodation is crucial. Further regulation is required to improve standards in relation to energy efficiency, minimum health standards and control of damp in private rental accommodation.
- The commitment to deliver a more efficient and effective shared service approach to inspections is welcome. New guidelines, which were due to be delivered by Q2 2017, must be influenced by stakeholders in the rental sector including those renting through the HAP scheme. There must be effective enforcement procedures to back up new inspection mechanisms; this will ensure rental accommodation returns to standard.
- Mechanisms must be put in place to protect tenants from any adverse consequences arising from inspection and enforcement procedures. Inspection of HAP tenancies should take place prior to the commencement of the tenancy, to prevent households losing their tenancy due to substandard accommodation.
- Annual inspections should examine key indicators identified in the revised standards in a similar manner to the National Car Test (NCT).

Priority 3: Support in housing

Housing Support:

Adequate support in housing is critical to the success and sustainability of exits from homelessness and Housing First approaches. Such approaches must be flexible, person centred, open ended and adequately resourced. The support offered needs to be three dimensional including housing support, clinical support and supports towards community reintegration, as necessary. This combined support allows housing first tenants to maintain their tenancies, improve their general health and well-being and seek education and employment opportunities if and when they choose to. Learnings from the initial and expanded rollout of Housing First must be captured and shared widely amongst housing and homelessness service providers and stakeholders. Where necessary funding should be allocated to facilitate this.

Recommendations

- Adequate funding must be allocated to support work with vulnerable households once they have moved into social housing e.g. Support to Live Independently (SLI) and intensive case management associated with Housing First Initiatives for people with complex needs being rehoused. This support ensures better outcomes for the tenant and increases the stability of the tenancy.

Clinical Support:

Alcohol and drug services must be resourced to target the needs of people experiencing homelessness with alcohol and/or drug related problems. The allocation of an additional €3 million in Budget 2017 to support drugs and social inclusion measures was welcome. 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.

Recommendations

- Fund the Pillar 1 Step-up/Step-down and addiction treatment facilities committed to by Minister Coveney and Minister Harris in September 2016. Ensure that the capital and revenue costs for the operation and development of this facility are in place in Budget 2018, as committed to in September 2016, (see appendices for more details).
- At a minimum the funding shortfall outlined above must be made available through Budget 2018 bringing total spending to €8 million in line with the revised commitment contained in the *Rebuilding Ireland Third Quarterly Progress Report*.⁴⁰
- Ring fenced funding must be put in place for the immediate and full implementation of the new National Drugs Strategy 'Reducing Harm, Supporting Recovery – a health led response to drug and alcohol use in Ireland 2017 – 2025'.
- There must be full delivery of this commitment in Budget 2018 in addition to ring fenced funding to implement *A Vision for Change* or its successor strategy.
- Increase funding for mental health services to 8.24% of the national health budget as recommended in *A Vision for Change*. This should include the dedicated ring fencing of funding streams for the full implementation of the commitments contained in *A Vision for Change*.
- Develop 'Specialist Adult Teams' to manage the combination of complex and problematic drug and alcohol use and mental health issues as recommended in *A Vision for Change* and the 'National Clinical Programme for the Assessment and Management of Patients Presenting to Emergency Departments following Self Harm' and ensure interagency responses.

⁴⁰ DHPCLG, 'Third Quarterly Progress Report', June 2017, P.20, [file:///C:/Users/eamonn/Downloads/Third_Quarterly_Progress_Report_RBI_31_May_2017%20\(1\).pdf](file:///C:/Users/eamonn/Downloads/Third_Quarterly_Progress_Report_RBI_31_May_2017%20(1).pdf).

- The proposal in the *Implementation Plan on the State's Response to Homelessness* to provide a dedicated Community Mental Health Nurse in each ISA10 area to support the needs of people who are homeless or at risk of homelessness needs to be actioned.⁴¹ This is supported in the *Report of the Committee on Housing and Homelessness* (2016).⁴²
- Trauma informed practices and counselling services should be prioritised including greater resourcing of social work, community and family services as a means of reducing the prevalence of problematic drug and/or alcohol use and earlier drug taking by those that have experienced adverse traumatic experiences in childhood.

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.

⁴¹ Implementation on the State's Response to Homelessness, May 2014 to December 2016, <http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Housing/FileDownload%2C38053%2Cen.pdf>.

⁴² Report of the Committee on Housing and Homelessness, June 2016, <http://www.oireachtas.ie/parliament/media/committees/32housingandhomelessness/Final-Report-pdf>.

Conclusion

Budget 2018 is a critical budget for this Government; it is also a critical budget for people who are homeless and experiencing housing instability. It is time to ensure that there will be an end to long term homelessness and rough sleeping by resourcing and implementing a Housing First approach. Limited access to housing and support services is both increasing the risk of homelessness and is preventing people from moving out of homelessness. We cannot keep offering people short term solutions with little attention paid to their longer term needs. More must be done to prevent homelessness occurring as all elements of our housing sector show signs of being broken. A new cross-departmental National Homeless Strategy is now required to complement and build upon existing commitments and actions contained in *Rebuilding Ireland*. This strategy must acknowledge that people experiencing homelessness are not a homogenous group and that a broad spectrum of diversity exists regarding people's experiences of homelessness. The primary focus of a national homelessness strategy must be on preventing homelessness occurring in the first place, the nationwide implementation of Housing First and addressing the multiple and complex health needs of people experiencing homelessness. Ultimately, we need to fundamentally rethink our approach to housing.

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. For more information please visit

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: Summary of Recommendations

Priority 1: Preventing homelessness and keeping people in their homes

1.1 Overarching Recommendation:

- *National Homeless Sub-Strategy*: A new cross departmental National Homelessness Sub-Strategy under the auspices of *Rebuilding Ireland* is required with ring fenced funding for implementation. This sub-strategy would complement and build upon existing commitments contained in *Rebuilding Ireland* including prevention, nationwide implementation of Housing First and addressing multiple and complex needs. This strategy should acknowledge that people experiencing homelessness are not a homogenous group and that a broad spectrum of diversity exists regarding people's experiences of homelessness focusing on homelessness amongst single people; families; women; young people and drug/alcohol users.

1.2 Rent Supplement/HAP limits:

- Increased budgetary allocation are required to allow for bi-annual monitoring and adjustment of RS/HAP limits to ensure alignment with rising private market rents.
- Community Welfare Officers and Local Authorities must be fully resourced to make urgent discretionary uplift payments under RS and HAP schemes. 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.
- Single people and couples should be specifically targeted given the disproportionate negative impact inadequate RS/HAP limits are having on these households' ability to access affordable housing.
- With the termination of a HAP tenancy, the onus should be on the Local Authority to find appropriate, alternative housing options as with RAS tenancies in the past. This should not be the responsibility of hard pressed, stressed households that may have varying financial and personal capacity to do so.
- Review the policy approach that determines a household's social housing need met once in receipt of HAP. In the absence of sufficient security of tenure in the Private Rented Sector this approach does not reflect the perilous reality of many HAP tenancies.

1.3 Funding for current and future prevention measures:

- Expand the scope of funding under Section 10 of the Housing Act 1988 to support those who are at risk of homelessness to help sustain tenancies in addition to providing rapid re-housing so that a person's experience of homelessness is ended as quickly as possible. This funding is currently restricted to assisting those who have experienced homelessness. This legislative change should be prioritised in conjunction with the development of the aforementioned sub-strategy.
- Make funding for information and advice services fully available to provide much needed advice to households to remain in their homes. As needed, additional funding should be allocated to maintain the *Abhaille* service beyond 2019 to assist current and future homeowners struggling to cope with mortgage arrears.
- 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.
- Expand the Homeless HAP scheme nationally. This scheme currently supports 1,711 households who have moved out of emergency accommodation into stable tenancies as of July 2017.

<p>1.4 Adequate Social Protection Supports:</p> <ul style="list-style-type: none"> • We encourage the current Minister for 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 legislation. • State budgets should progressively bring welfare payments above the poverty line which currently stands at €235.73 per week for a single person. In the interim period, Budget 2018 should increase social welfare rates by €5 per week restoring to pre-cuts level of €204 per week in Budget 2019. • The reduction of personal rent contributions for those in receipt of Jobseekers Allowance as of January 2017 is welcome. Personal rent contributions should be monitored and reduced further for these 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. There should be equity of social welfare rates for all eligible jobseekers. • 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. • Remove prescription charges for people who are homeless.
<p>1.5 Mortgages in Distress:</p> <ul style="list-style-type: none"> • Continued investment in the recently amended Mortgage-to-Rent scheme is required to ensure its future viability. • Fully resource Approved Housing Bodies (AHB's) to engage with the Mortgage-to-Rent scheme to increase national coverage to provide the services required under the scheme. In the interim period, alternative options must be put in place for those living in areas with little or no AHB coverage. • Additional resources must be available to implement the commitments contained in the Programme for Partnership Government including a review of the thresholds and processes for Personal Insolvency Arrangements; the establishment of a dedicated mortgage arrears courts service; and the amendment of the Code of Conduct on Mortgage Arrears to include an obligation on mortgage providers to provide sustainable arrears solutions. • Greater use of Mortgage write-down must be encouraged amongst mortgage providers.
<p>Priority 2: Rapid access to affordable, safe and secure housing and prioritisation of people experiencing long term homelessness</p>
<p>2.1 Housing First and prioritisation of people who are long term homeless:</p> <ul style="list-style-type: none"> • Budget 2018 should provide resources to establish a National Housing First programme with published tenancy targets for its national roll out. • Adequate funding across relevant Government Departments is required to ensure the expansion of Housing First with the necessary wraparound support. Critical departments include the Department of Health/HSE, Department of Social Protection and the Department of Finance.
<p>2.2 Emergency Accommodation:</p> <ul style="list-style-type: none"> • Emergency Accommodation should only ever be used in the short term – ideally averaging no more than 7-10 days. Similarly, Family Hubs must only be used in the short term with a three month time limit. On entering emergency accommodation or a Family Hub, households must be immediately supported to source and maintain a tenancy in the wider community. • A five-year plan should be put in place aimed at reducing the time spent in emergency accommodation to an average of 7-10 days per person. This should be part of the aforementioned sub-strategy. • The average length of stay per person/family in emergency accommodation and hubs should be reported quarterly and subject to agreed reduction targets for the following year. • Ensure funding for emergency hotel rooms and B&B's must be additional to the homeless budget (Section 10 funding) and ring-fenced so funding is not diverted from Housing First services and other homeless services that are already stretched to capacity.

<ul style="list-style-type: none"> • There is a need for ring fenced funding for specialist voluntary services such as Homeless Action Teams to ensure appropriate visiting and on-site support is provided to those in private emergency accommodation, Family Hubs and longer term sustainable tenancies on exiting homelessness.
<p>2.3 Social Housing Supply:</p> <ul style="list-style-type: none"> • Triple direct capital expenditure funding to €1 billion per annum to enable the rapid building within 16 months of 5,000 additional social housing units by Local Authorities and AHB's. • There needs to be prioritisation of housing options which can be delivered quickly including rapid builds and vacant/empty homes. • Local Authorities and AHB's must be resourced to build social housing stock to meet low and middle income households' housing needs. In 2016, only 652 Local Authority built houses were delivered. • The Government must seek further flexibility from the European Commission on the application of the EU fiscal rules regarding the financing of social housing. • We support the recommendation proposed by both NESC (2014) and the Nevin Institute (NERI 2017) to establish a new semi-state Irish affordable Homes Company with the necessary resources.
<p>2.4 Rapid Build Housing:</p> <ul style="list-style-type: none"> • Emergency budgetary measures must now be taken to ensure the delivery of Rapid Build Housing targets nationally within the agreed timescales.
<p>2.5: Make better use of existing housing stock and voids:</p> <ul style="list-style-type: none"> • Fast track the implementation of the Empty Homes Strategy once published. It is disappointing that publication has been delayed. • A vacant property tax should be introduced for homes empty for more than 12 months. Such a tax could be calculated on the basis of property value or potential rental income and increased the longer a property remains vacant. Revenue raised through the vacant property tax could be redirected to fund further vacancy reduction measures and social housing output. • Amend the vacant site levy and reduce the number of exemptions available to owners of development land subject to a loan on the property in question. The levy should apply until occupation of the site and be implemented immediately. • The <i>Repair and Leasing</i> and <i>Buy and Renew</i> schemes should be reviewed with targets revised upwards and ensuring the schemes can attract the greatest number of home owners possible. Allocations under both schemes should prioritise people who are long term homeless. • Additional resources must be made available to AHB's to assist with the identification of vacant properties and their respective owners. This dual identification process is both time and resource intensive. • The rent payable to property owners engaged with the <i>Repair and Leasing</i> scheme should be increased to 92-95% of market rent. • Where a vacant property owner chooses not to engage with the <i>Repair and Leasing</i> scheme, the viability of purchasing that property under the <i>Buy and Renew</i> scheme should be assessed.
<p>2.6 Support Approved Housing Bodies (AHB)/Voluntary Co-operations to access finance:</p> <ul style="list-style-type: none"> • Increase the Housing Agency capital expenditure funding for the purchase of vacant housing portfolios for the delivery of social housing units by AHB's. • AHB's/Voluntary Co-Operatives need to be supported to act quickly when opportunities arise. Mechanisms must be explored to improve access to finance, for example review and revision of the Capital Advanced Leasing Facility (CALF) to make it more financially viable.

- There is an urgent need to explore new funding models and mixed funding models including private finance, state funding and AHB's/Voluntary Co-Operatives working in partnership. The proposals made by the Irish League of Credit Unions should be explored further in light of upward lending limits they can make available for the provision of social and affordable housing.
- The Capital Assistance Scheme (CAS) must be resourced and protected as a key mechanism for the delivery of social housing to special needs groups particularly people who are homeless. This should be an open, annual rolling process which would be available to AHB's as opportunities arise.

2.7 Private Rented Sector

2.7.1 Rent Certainty and Rent Predictability

- Full rent certainty is required. Consideration must be given to index linking rents to the Consumer Price Index (CPI). Further research is required to examine the viability of this rent certainty measure in addition to exploring alternative methods of rent certainty successfully employed in other jurisdictions.
- In the absence of full rent certainty, rent predictability must be extended nationwide as a matter of priority to reflect the national scale of the rental crisis. Ongoing monitoring on the basis of local electoral area boundaries is essential to gauge the impact of the measure.
- Allowable rent increases in RPZ's should be restricted to the current 4% per annum. Under no circumstances should allowable rent increases be revised upwards. This position must be central to the ongoing review of the Rent Predictability Measure.
- Active enforcement of the Rent Predictability measure by the RTB is required to ensure compliance within RPZ's. A public awareness campaign is required to provide clarity and to ensure landlords and tenants are aware of the implications and obligations attached to the Rent Predictability measure.
- A register of current sitting rents is now required to ensure active enforcement, compliance and to combat inflationary rent increases being applied at the commencement of new tenancies.

2.7.2 Security of Tenure

- Fast track the existing commitment to move towards indefinite leasing as a matter of urgency.
- The RTB should closely monitor terminations relying on Section 34 reasons to ensure landlords are acting in good faith and in compliance with the new standards contained in the Planning and Development (Housing) and Residential Tenancies Act 2016.
- Measures to prevent the simultaneous serving of termination notices on large numbers of residents in a single development should be amended to include cases of simultaneous termination of less than 5 tenancies.
- Tenants of Buy-to-Let (BTL) properties in receivership must have full protection. All landlord obligations should transfer to the receiver and subsequently to the new property owner.
- We support NESC's recommendations for a simple regime for taxation of rental income, providing clear incentives for long-term investment in the provision of good quality rental homes with secure tenancies.
- Landlords with more than three properties should not be able to invoke Section 34 of the RTA in order to issue notice of termination to tenants.
- Any incentives for landlords must be met with increased conditionality in terms of security of tenure and rent certainty.

2.7.3 Tenant Services

- The enhanced rent supplement payment service provided by the Tenancy Protection Service should be rolled out nationally to ensure those who need to access additional rent supplement payments can do so without unnecessary delay. There is a need to set and publish specific targets for the rollout of this service as a matter of priority.
- Amend, commence and implement the Deposit Protection Scheme, which is provided for in the 2015 amendments to the Residential Tenancies Act, immediately.

<ul style="list-style-type: none"> To address the issue of unreasonable deposits being requested at the commencement of tenancies legislate for a statutory maximum of one month's deposit and one month's rent in advance to be paid at the commencement of a new tenancy.
<p>2.7.4 Tenant Services</p> <ul style="list-style-type: none"> The enhanced rent supplement payment service provided by the Tenancy Protection Service should be rolled out nationally to ensure those who need to access additional rent supplement payments can do so without unnecessary delay. There is a need to set and publish specific targets for the rollout of this service as a matter of priority. Amend, commence and implement the Deposit Protection Scheme, which is provided for in the 2015 amendments to the Residential Tenancies Act, immediately. To address the issue of unreasonable deposits being requested at the commencement of tenancies legislate for a statutory maximum of one month's deposit and one month's rent in advance to be paid at the commencement of a new tenancy.
<p>2.7.5 Supply</p> <ul style="list-style-type: none"> The commitment to develop a cost rental model needs urgent action and implementation. Develop an affordable rental model to provide housing for those who do not qualify for social housing and cannot afford to access housing in the private sector. To provide as many affordable housing units as possible Approved Housing Bodies (AHBs) must be fully resourced and supported to engage with the cost-rental and affordable rental models. Tax incentives for cost rental and affordable providers must be considered and linked to conditionality in terms of security of tenure. At a minimum, this should include mortgage interest relief, local property tax deductibility and access to current and future home renovation schemes. The 'Build to Rent' model is a positive inclusion in the <i>Rental Strategy</i>. The State should seek to acquire further social housing provision through developer contributions similar to Part V social housing contributions.
<p>2.7.6 Quality Standards</p> <ul style="list-style-type: none"> The introduction of new standards relating to the safety of private rental accommodation are welcome. Enforcement of these new standards by Local Authorities as part of the new shared service approach to inspection of private rented accommodation is crucial. Further regulation is required to improve standards in relation to energy efficiency, minimum health standards and control of damp in private rental accommodation. The commitment to deliver a more efficient and effective shared service approach to inspections is welcome. New guidelines, which were due to be delivered by Q2 2017, must be influenced by stakeholders in the rental sector including those renting through the HAP scheme. There must be effective enforcement procedures to back up new inspection mechanisms; this will ensure rental accommodation returns to standard. Mechanisms must be put in place to protect tenants from any adverse consequences arising from inspection and enforcement procedures. Inspection of HAP tenancies should take place prior to the commencement of the tenancy, to prevent households losing their tenancy due to substandard accommodation. Annual inspections should examine key indicators identified in the revised standards in a similar manner to the National Car Test (NCT) <i>Rent Certainty and Rent Predictability</i>.
<p>Priority 3: Support in Housing</p>
<p>3.1 Housing Support:</p> <ul style="list-style-type: none"> Adequate funding must be allocated to support work with vulnerable households once they have moved into social housing e.g. Support to Live Independently (SLI) and intensive case management associated with Housing First Initiatives for people with complex needs being rehoused. This support ensures better outcomes for the tenant and increases the stability of the tenancy.

3.2 Clinical Support:

- Fund the Pillar 1 Step-up/Step-down and addiction treatment facilities committed by Minister Coveney and Minister Harris in September 2016. Ensure that the capital and revenue costs for the operation and development of this facility are in place in Budget 2018, as committed to in September 2016, (see appendices for more details).
- At a minimum the funding shortfall outlined above must be made available through Budget 2018 bringing total spending to €8 million in line with the revised commitment contained in the *Rebuilding Ireland Third Quarterly Progress Report*.
- Ring fenced funding must be put in place for the immediate and full implementation of the new National Drugs Strategy '*Reducing Harm, Supporting Recovery – a health led response to drug and alcohol use in Ireland 2017 – 2025*'.
- There must be full delivery of this commitment in Budget 2018 in addition to ring fenced funding to implement *A Vision for Change* or its successor strategy.
- Increase funding for mental health services to 8.24% of the national health budget as recommended in *A Vision for Change*. This should include the dedicated ring fencing of funding streams for the full implementation of the commitments contained in *A Vision for Change*.
- Develop 'Specialist Adult Teams' to manage the combination of complex and problematic drug and alcohol use and mental health issues as recommended in *A Vision for Change* and the 'National Clinical Programme for the Assessment and Management of Patients Presenting to Emergency Departments following Self Harm' and ensure interagency responses.
- The proposal in the *Implementation Plan on the State's Response to Homelessness* to provide a dedicated Community Mental Health Nurse in each ISA10 area to support the needs of people who are homeless or at risk of homelessness needs to be actioned. This is supported in the *Report of the Committee on Housing and Homelessness (2016)*.
- Trauma informed practices and counselling services should be prioritised including greater resourcing of social work, community and family services as a means of reducing the prevalence of problematic drug and/or alcohol use and earlier drug taking by those that have experienced adverse traumatic experiences in childhood.

3.3 Community Integration:

- 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.

Appendix 2: Housing and homelessness crisis in numbers

- During one week in June 2017 (latest available figures), there were 7,941 men, women and children in emergency accommodation across the country. This included 3,206 adults with no dependents in their care and 1,365 families with 2,895 children. (DHPCLG, June 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 76,000 principle dwelling mortgage accounts are in arrears. 43% of all mortgage arrears are in arrears of over 720 days (Central Bank of Ireland, May 2017).
- At the end of March 2017, 20,009 or 16% of buy-to-let mortgages, were in arrears of more than 90 days. (Central Bank of Ireland, May 2017).
- 750,000 people are living in poverty in Ireland (*Poverty, Deprivation and Inequality* (July 2016) Social Justice Ireland Policy Briefing).
- Since 2007 the deprivation rate, which looks at the number of people forced to go without at least 2 of 11 basic necessities examined, in Ireland has doubled - 29% of the population or 1.3 million people are experiencing deprivation (Social Justice Ireland *ibid*).
- According to Census 2016, there are 183,312 vacant houses nationwide.

Appendix 3: Step-up/Step-down and addiction treatment facilities

Fund the Pillar 1 Step-up/Step-down and addiction treatment facilities committed by Minister Coveney and Minister Harris in September 2016

At the press briefing on Pillar 1 on 22nd September 2016, Minister Harris said that the government had “committed funding for an intermediate health-care step-down facility and the development of an addiction treatment unit by Dublin Simon at Usher’s Island in Dublin 8”. Dublin Simon Community has since received planning permission for the planned 100-bed medical residential treatment facility. It is essential that the funding to fulfil this commitment forms part of Budget 2018 to enable this critical project to mobilise in 2018 and to prepare to accommodate 100 vulnerable people.

This 100 bed low threshold addiction treatment facility at Ushers Island Dublin 8 (Dublin Simon Community) development will consist of:

- Alcohol and Benzodiazepine Addiction Detoxification Unit for people who are homeless.
- A pioneering Rapid Access Alcohol and Drug Detoxification/Stabilisation service in partnership with Merchants Quay Ireland in Dublin for people who are homeless, chaotic and require a treatment option with no threshold.
- Expansion of the remit of the HIV Stabilisation/Respite service to include all blood borne viruses in particular Hepatitis C.
- Expansion of the Residential Addiction Recovery service and beds for people who are homeless.
- Intermediate Care Step up/Step down Facility for hospital admission and discharge post-surgery and major treatment in partnership with GP’s for people experiencing homelessness.

The above services will be complemented by:

- Counselling services for homeless individuals engaging in addiction treatment.
- Low threshold residential addiction rehabilitation/recovery services for people who are experiencing homelessness.
- Aftercare services for those recovering from problematic drug or alcohol use.
- Addiction specific In-reach Homeless Action Teams involving Dublin Simon Community, the DRHE and the HSE.

In this regard, government now needs to ensure that the €20m capital and €1.9m per annum revenue costs to develop and operate Usher’s Island are in place via the Budget 2018 process and thereby fulfil *Rebuilding Ireland* action item 1.15, “*We will improve mental health and primary care services for homeless person using the existing allocation of €2m, and we will increase the allocation of €6m in Budget 2017*”, and action item 1.16, “*We will address the rehabilitation needs of homeless people with addiction issues, through the new National Drugs Strategy*”.

This will also fulfil the *National Drugs Strategy 2017 – 2025*, strategic action 2.1.16 “*Expand the availability and geographical spread of relevant quality drug and alcohol services and improve the range of services available, based on identified need.*”

(a) *Identifying and addressing gaps in provision within Tier 1, 2, 3 and 4 services*

(b) *Increasing the number of treatment episodes provided across the range of services available, including:*

- *Low Threshold;*
- *Stabilisation;*
- *Detoxification;*
- *Rehabilitation;*
- *Step-down*
- *After-Care*

(c) *Strengthening the capacity of services to address complex needs.*