

Simon Communities of Ireland Submission on the Draft Online Safety Code - Coimisiún na Meán

Introduction

Simon Communities of Ireland welcome the establishment of Coimisiún na Meán, and the opportunity to make a written submission on the Draft Online Safety Code. Simon Communities are engaging with the Commission's Draft Online Safety Code and its aims, to raise issues related to the protection of those experiencing homelessness in Ireland.

We note that the draft code includes the objective to protect the general public from audio-visual programmes, user-generated videos, and audiovisual commercial communications that contain incitement to violence or hatred directed against a group of persons or a member of a group based on grounds referred to in Article 21 of the Charter of Fundamental Rights of the European Union, namely sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age, sexual orientation.

We raise the point above as the focus of our submission is on the areas which are particularly relevant to the Simon Communities as providers of services to those experiencing homelessness. Namely, to raise our concern about any hateful content that centres on homelessness and those who are seeking refuge and asylum in Ireland.

Migration and Homelessness

It is important to note that those who migrate to Ireland, both EU and non-EU citizens are not immune to homelessness. This is particularly the case as the housing crisis and most particularly the lack of affordability in the private rental market is a driving cause of homelessness. Migrant headed households making their home here in Ireland are disproportionately reliant on the private rental market and so can be overrepresented in the homeless figures. We have a concern that this fact could be mis-represented to direct blame, vitriol and even violence towards those from new communities in Ireland experiencing homelessness rather than evidence that homelessness is a housing issue and the correct housing policy can address its rise.

This concern is heightened in the context of the rise in the incitement of hatred and violence directed towards immigrants, particularly refugees and asylum seekers. This incitement has been

amplified by online platforms, with the spread of disinformation and a harmful narrative which looks to blame immigrants for the current homelessness and housing crisis or to move the focus of the crisis to this group.

These issues and the consequences do not exist solely in the online space. Over the past number of months there have been arson attacks on buildings intended to provide emergency accommodation. This fact is a cause of concern and anxiety to service providers and service users.

Offering Protection

The proposal to include user-generated content that is indissociable from user-generated videos in the content to be covered by the Code is an extremely important and welcome measure. Replies and comments under an online post can often be the source of harmful and hateful narratives.

Simon Communities of Ireland also welcome the requirements set out in the Code in relation to the reporting and flagging of content, and the requirements in relation to complaints. Although, we do wish to highlight the importance of harmful content being quickly removed.

We appreciate the Code requires service providers to set targets with respect to timelines and the accuracy of reporting and flagging mechanisms. It is paramount that harmful content and disinformation which incites hatred and violence is removed from online platforms without delay.

Simon Communities of Ireland would also like to take this opportunity to highlight the importance of protecting people experiencing homelessness's privacy. Living in homelessness often means living a life with little to no privacy. This is particularly relevant for rough sleepers. Simon Communities of Ireland appreciate the right to film in public places; however, we would like to highlight that filming vulnerable homeless people without their consent and uploading this content to online platforms should not be tolerated. People experiencing homelessness lack the comfort of having a home to call their own. Filming someone in the privacy of their own home without their knowledge or consent is not an acceptable practice, and therefore the practice of filming homeless people in public should not be an acceptable practice either.

Conclusion

The submission has highlighted our concern regarding the increase of hateful content centred around homelessness and individuals seeking refuge in Ireland, in addition to the filming of those

experiencing homelessness in public places. The inclusion of these issues in the strategy we believe is important in the current context but beyond that could be seen as a benchmark of the ambition of the Commission in protecting the most vulnerable.

About Simon Communities of Ireland

The Simon Communities support over 22,000 men, women, and children. We have 50 years of experience providing homeless, housing and treatment services to people facing the trauma and stress of homelessness. We are a network of independent Communities based in Cork, Dublin, Dundalk, Galway, the Midlands, the Mid West, the Northwest, and the Southeast, responding to local needs and supported by a National Office in the areas of policy, research, and communications. We share common values and ethos in tackling homelessness and, informed by our grassroots services, we campaign for more effective policies and legislation regionally, nationally and at European level. Whatever the issue, Simon's door is always open for as long as we are needed. For more information, please visit www.simon.ie.

Services include:

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