



COMBATING HOUSING EXCLUSION IN IRELAND

**CAN 'HOUSING FOR ALL' DELIVER FOR
THE PEOPLE SVP ASSISTS?**

SEPTEMBER 2021



Society of St Vincent de Paul

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1. Introduction

1.1 Background – Housing Exclusion in Ireland

Access to housing is fundamental to our wellbeing and this has become the more evident during the Covid-19 pandemic. It is estimated there are 1.8 billion people globally living in homelessness and grossly inadequate housing.¹ These individuals and families typically endure stark conditions including a lack of access to basic services such as sanitation, running water, and electricity, no security of tenure; and housing that is simply unaffordable.²

In Ireland, the number of individuals and families accessing emergency accommodation has increased by over 26% since July 2016 when Rebuilding Ireland was first introduced. In 2016, 6,525 people accessed emergency accommodation (4,177 adults and 2,348 dependents). By January 2020, that number had increased by 57% to 10,271 people (6,697 adults and 3,574 dependents).

Since March 2020 and the introduction of legislation to prevent rental evictions and rent increases during the Covid-19 pandemic, homelessness had begun to decrease, however, with the recent lifting of restrictions we have witnessed an increase in homelessness again. The latest official statistics show that there are 8,132 people or 6,003 households currently accessing emergency homeless accommodation.³

The 'official' count of 8,132 people experiencing homelessness in July 2021 does not include over 20,000 individuals and families on the social housing list doubling up with friends or family⁴, often known as the 'Hidden Homeless' or the 3,052⁵ women and children in domestic violence refuges but have nowhere to go or almost 8,000 individuals living in direct provision. Added to this is over 600,000 people, including 140,000 children in Ireland who live in substandard housing with a leaking roof, damp walls or foundations or rot in windows frames or floors.⁶

¹ Leilani Farha, United Nations Special Rapporteur on the Right to Housing cited in Hearne R. (2020) Housing Shock the Irish Housing Crisis and How To Solve It. Published in Great Britain

² ibid

³ Department of Housing, Local Government and Heritage Homeless Report – July 2021 [gov.ie](http://www.gov.ie) - [Homeless Report - July 2021 \(www.gov.ie\)](http://www.gov.ie)

⁴ Department of Housing, Local Government and Heritage Summary of Social Housing Assessments 2020-Key

Findings [gov.ie](http://www.gov.ie) - [Summary of Social Housing Assessments 2020 – Key Findings \(www.gov.ie\)](http://www.gov.ie) Table A1.7 Breakdown of current tenure by Local Authority

⁵ <https://www.safeireland.ie/policy-publications>

⁶ Engineers Ireland 'The State of Ireland 2019' A Review of Housing and infrastructure in Ireland <http://engineersireland.ie/EngineersIreland/media/docs/State-of-Ireland-2019.pdf>

While these issues and reality is not always visible to the public, it is causing significant stress for a sizeable number of people in Irish society.

SVP has a unique insight into the current reality of the housing crisis, as SVP members visit families in hotels, B&B's, family hubs and those that are experiencing 'hidden homelessness'. SVP staff and volunteers also work in resource centres operated by the society which provide vital supports to families experiencing homelessness. In addition, the society is a provider of social housing with almost 1,000 units across the country and engages in advocacy on the issue of housing and homelessness, drawing on the experience of members and policy analysis to seek to bring about the necessary policy change. Working directly with individuals and families experiencing housing insecurity, inequality, poverty, and marginalisation has afforded SVP a valuable perspective on the key challenges and opportunities in addressing the housing crisis.

In a compassionate and just society no one life should be blighted by the experience of homelessness or the stress of housing insecurity. Homelessness stands in stark contrast to the image of home as refuge and safety. At any stage or age in life, homelessness and housing exclusion brings a host of risks and vulnerabilities to affected individuals, but the number of children is a particular concern.

It is within this context that SVP welcomes the publication of the Housing for All plan.⁷ This new housing plan contains a range of actions and measures which aim to provide 33,000 social, affordable, cost rental and private homes, on average each year up to and including 2030. We urgently need this plan to deliver for the people SVP assists and to provide secure and affordable homes for people to live in vibrant and sustainable communities.

1.2 Report Aims and Objectives

The purpose of this report is to shine a light on the hidden aspects of the housing crisis as seen by SVP. Drawing upon commissioned research, case studies and surveys of SVP members, the report seeks to build up a picture of the human impact of homelessness, housing insecurity, poor quality accommodation and housing exclusion over the past four years. This is followed by an analysis of the key policy issues for Government from the perspective of SVP, paying particular attention to the dynamics of the private rental market in meeting the needs of low income and marginalised households. Within this context, the report concludes with an assessment of the new Government strategy *Housing for All* and whether it will deliver for those most acutely impacted by the housing crisis.

⁷ Housing for All: A New Housing Plan for Ireland [gov.ie](http://www.gov.ie) - [Housing for All - a New Housing Plan for Ireland \(www.gov.ie\)](http://www.gov.ie)

2. The Human Impact of the Housing Crisis as seen by SVP

SVP members visit people in their homes who are struggling on low incomes and dealing with complex issues relating to poverty and marginalisation. The purpose of this section is to ensure their voices are heard and to see the real-life impact of the housing and homeless crisis on individuals, families, and children.

As well as supporting people experiencing homelessness and housing exclusion, SVP members, find that individuals face precarious housing conditions, living in substandard and/or overcrowded accommodation. These situations often include doubling up or tripling up with relatives or friends. While these arrangements may be considered a better alternative than entering emergency accommodation, members state it has a debilitating effect on a person's mental and physical health. In many instances it leads to feelings of isolation, limited privacy, and restrictions on behaviour and lifestyle. In addition, members visit people renting in the private rented sector who are paying unaffordable and unsustainable high rents leaving them at increased risk of eviction. It also means they can find it extremely difficult to afford the basics such as food and heat. People who find themselves in these varied situations are often called the 'Hidden' homeless as they are not officially counted as homeless by Local Authorities or the Department of Housing.

2.1 Trapped in Emergency Accommodation

Home is and should be a haven for children. It is a place a child can feel protected and secure. Children and young people want to feel the same as their peers. However, it is impossible for children that are homeless to feel this way. SVP members have reported variances in the quality of homeless accommodation. Some of the families they visit are in accommodation that would be considered of good quality, children have adequate places to play for example, while other homeless services are lacking in the basics, such as adequate levels of cleanliness, space, and proper facilities to prepare food.

The overwhelming number of families who are becoming homeless had their last stable home in the private rented sector, and the crisis in



"We visit families in emergency accommodation. Yes, the rooms are warm, and they have a roof over their heads. But basic needs are not being met by hotel/B&B accommodation. No access to cooking facilities, nowhere to do homework. We worry for the children's future" SVP member, East Region

this sector is the immediate cause of their homelessness – landlords selling up or the house is being repossessed, shortage of properties to rent, landlords not accepting rent supplement and housing assistance payment (HAP), and high rents.⁸ A 2019 report by Focus Ireland found that 70% of families accessing emergency accommodation in Dublin in 2019 came from the private rented sector.⁹

SVP members are currently visiting families in hotels and B&B's that do not have access to a fridge or a personal washing machine. They report this is extremely challenging for families, particularly if a child becomes sick. They are in a confined space with no proper facilities to wash clothes in order to limit the spread of infection to other family members.

Families that must 'self-accommodate' have to find their own emergency accommodation

"A family we helped attend summer camp in our local resource centre did not participate in an end of week outing to a leisure centre. Members found out later that the parent had no way of drying towels in the hotel room and felt embarrassed by this fact and didn't send her children on the swimming trip as a result" SVP Member, East Region

and are not able to access vital supports such as a case worker who can assist them with the daily challenges of homelessness and importantly support families to get out of emergency homeless accommodation. SVP members have reported visiting a family for a couple of weeks, returning for a follow-up visit, to find they are no longer there, they would then be told by hotel staff the family have been moved to alternative homeless accommodation. One can only imagine how stressful these events are on young children.

Parents reported that in order to fully access and participate in education, their children's

requirement for food, adequate rest and physical health needed to be satisfied. In all cases, this was not happening to the extent it needs to, due to their living conditions. Many of the parents interviewed had scarce financial resources and were living in poverty. Parents described their children as sad, depressed, angry, suffering ill-health and had low self-esteem. All parents said the onset of these difficult behaviours and emotions were due to the feelings of uncertainty and insecurity because of homelessness.

SVP are deeply concerned about the thousands of children who are experiencing hidden homelessness. These children have no place to call home and are often doubling up, tripling

⁸ Focus Ireland website See <https://www.focusireland.ie/resource-hub/about-homelessness>

⁹Focus Ireland 13th June 2019 Press Release <https://www.focusireland.ie/press/focus-ireland-report-finds-that-nearly-70-of-families-becoming-homeless-in-dublin-had-their-last-home-in-the-rental-sector/>

up, staying with friends or relatives as they have nowhere else to go. Their living situation is precarious, unsuitable, and unsustainable. Despite facing many of the same challenges faced by those living in emergency accommodation, those experiencing hidden homelessness don't qualify for many support services.

Approximately, 40% of Traveller children are living in overcrowded accommodation.¹⁰ Also, children living in direct provision are sharing living spaces with other individuals and families resulting in overcrowded, unsuitable, and stressful living environments. SVP members have raised the issue of what many families take for granted, somewhere quiet and safe for children to do their homework. In some direct provision centres, there is nowhere suitable for children to study or complete homework. SVP members have supported families to access libraries and resource centres in these instances. However, those facilities have not been available to families during the pandemic.

SVP members have also reported the practical challenges in finding somewhere to live and continue caring for children. Some of the families SVP support have no support networks to help with childcare for example, while a parent views a property, or they may have to travel long distances with small children to view a property.

The acute need for increased provision of homes which will provide safety and security is to the forefront of the minds of SVP members who visit and support some of these children in emergency homeless accommodation.

¹⁰ Joint Oireachtas Committee on Children and Youth Affairs Wednesday, 8th May 2019 Children's Rights Alliance Report Card 2019: Discussion <https://www.kildarestreet.com/committees/?id=2019-05-08a.262&s=%22direct+provision%22+2019-05-08..2019-05-17#g265>

2.2 Housing Costs, Deprivation, Poverty, and Insecurity

Two recent studies of housing affordability pressures Corrigan et al., 2019¹¹ and O'Toole et al., 2020¹² document the high share of households facing high housing costs which can lead to an increased risk of homelessness and housing exclusion. According to these reports, prior to the pandemic, approximately one-in-three households who were not in receipt of State housing supports were classed as having insufficient income after housing costs to afford a standard basket of goods and services. Separately, Honohan, (2021) identifies the elevated cost of housing in Ireland as one of the main reasons for the relatively high domestic cost of living when compared with other European Area countries.¹³

“Mary is a Lone Parent in receipt of social welfare, which is her only source of income. She has two teenage children, one of whom has special needs. She is paying €50 per week out of her limited income and that is on top of her differential rent contribution for an old, terraced house that has no heating as the gas boiler does not work and the landlord has refused to fix it”. SVP Member, East Region

In 2019, over one in three (34.4%) individuals living in rented accommodation were living in enforced deprivation, compared to 27.4% in 2018. There was little change in the year-on-year deprivation rate of those living in owner-occupied accommodation, going from 10.0% in 2018 to 10.3% in 2019.¹⁴

¹¹ Cited in Economic Social Research Institute Special Article M. Allen-Coghlan, K. Mc Quinn and C. O'Toole 2020 Assessing the impacts of Covid-19 on the Irish property Market: An overview of the issues [QEC2020AUT_AllenCoghlan.pdf \(esri.ie\)](#)

¹² *ibid*

¹³ *ibid*

¹⁴ Central Statistics Office, 2019 Urban and Rural Life in Ireland, 2019 <https://www.cso.ie/en/releasesandpublications/ep/p-urli/urbanandrurallifeinireland2019/housing/>

In SVP's experience, rising housing costs have become increasingly a driver of poverty and deprivation among the households we support. In our 2019 report with Threshold

“Many of the families we support are paying extra under HAP and find the cost of heating their homes very expensive as houses don't retain heat and they are also under pressure with the cost of medications and transport”
SVP Member, North West Region

entitled *Housing Assistance Payment (HAP): Making the right impact?* 20% of the tenants surveyed were paying more than the 30% limit, with 10% paying more than 40% of their net income on rent. Almost half (45%) of those paying a top-up said that they were struggling with paying utility bills, buying groceries, and covering childcare and school costs as a result. The report contains many examples of the difficulties HAP tenants face, including the discrimination experienced by

some vulnerable households trying to access housing in the Private Rental Sector (PRS), who must compete with other prospective tenants who may be seen as more desirable by landlords.

Similar themes were found in the Vincentian Partnership for Social Justice report titled 'Stories of Struggle'.¹⁵ Housing is an omnipresent theme throughout the interviews that intensifies family's struggles.

¹⁵ Society of Saint Vincent De Paul (SVP), 2018, Experiences of Living Below the Minimum Essential Standard of Living, Stories of Struggle Research Publication
<https://www.svp.ie/social-justice/publications-submissions/publications/stories-of-struggle-2018.aspx>

Families discussed the discrepancy between rental supports and actual private rent prices. There were ongoing issues regarding the chronic lack of availability of rental accommodation within the rent support limits. Families stated they were paying “top-up” payments to their landlords. Two families interviewed in the ‘Stories of Struggle’ report, became homeless because they could not afford these increasing top-up payments to their landlords. Annual rent increases meant families’ incomes were falling further below the cost of their needs each year.

Less than one quarter of families were in social housing. All the families in the private rented sector, and homeless families, had a long-term housing need. Families discussed their desire for housing (“housing would change my life”) and social housing delays. One lone parent living in social housing was at times sharing her home with her six children and six grandchildren, because her offspring could not afford private rented accommodation.

“Our client is in rent arrears of €4,950. This is because there has been a delay in processing her HAP application. We are liaising with the LA & CWO, but we have not received assurances these arrears will be paid. Meanwhile, the landlord has verbally threatened the family with eviction for non-payment of rent. The tenants are fearful and scared for their future.” SVP Member, East Region

“The lack of social housing and affordable rental accommodation is wreaking havoc on society and will leave a legacy of destruction in its wake which we will be dealing with for years to come” SVP Member West Region

There was a strong current throughout the interviews that parents wanted a place to call their “home,” so they could create a stable environment and routine for their children. They believed this could be achieved with the permanency of social housing.

2.3 Homelessness and Housing Insecurity in Rural Ireland

Homelessness is often assumed to be an urban problem because there are larger and more visible numbers of people experiencing homelessness. As a result, there are less emergency accommodation units and homeless supports in rural areas than in urban areas. In SVP’s experience, the lack of homeless services is a major challenge when it comes to addressing rural homelessness. Not only do many of these services provide emergency accommodation, but they also have wraparound services and supports such as addiction

services, mental health, keyworkers etc. which in many instances are needed to ensure a person can exit homelessness.

“We have no homeless provision which means we had to supply accommodation in a B&B. We have supported approximately 10 families recently to move to suitable accommodation in the private housing sector as a lot of families are unable to raise the rent and deposit for a house”
SVP Member West Region

In March 2020, SVP Social Justice conducted a survey among Conference Presidents on issues affecting individuals and families living in rural areas on issues affecting households they are supporting affected by homelessness and housing exclusion.

In the survey answers provided, 59% of Conferences had supported individuals or families facing homelessness or who were at risk of becoming homeless. Conferences were providing assistance through help with deposits on private rented accommodation,

set up costs, rent (plus temporary accommodation costs), advocacy with landlord/services, childcare, and food costs while in temporary accommodation and help with heating costs.

When households were facing the prospect of losing their home, members assisted clients to find alternative accommodation. Whilst some Conferences reported local hostel provision, some Conferences said there was none available in the area, and they secured accommodation in hotels and B&Bs for families. Some families are placed far away from local ties, meaning long distance travel is required to get children to school and keep up with routines.

Temporary solutions can be unsuitable for family life, with one room being shared, no play space, and kitchen and laundry facilities unavailable, meaning families are left with additional food and laundry costs that Conferences support with. The transition to more permanent housing can be difficult and many of the individuals and families supported by members were expected to navigate the rental market without support and securing a longer-term private rental could be difficult with the level of HAP provided and the requirement for a deposit. When a property is found, moving in, and set up costs (such as bedding and furniture) had to be purchased by clients and SVP assisted this way also. The importance of supporting individuals and families in this transition stage was mentioned.

Respondents spoke of the importance of a network of local services – both council and government provision and the local community and voluntary sector, with SVP forming an important part of the safety net. In the instances where there was not a known local source

of support the Conference felt like the first and last point of help for families facing homelessness.

In addition, SVP members state that there is typically a lack of specialised services to guide and support those individuals through the trauma of homelessness in rural areas. There can be an increased risk of stigmatisation and feelings of shame for people experiencing homelessness in small rural areas where everyone tends to know each other. However, often members have stated that homelessness can be prevented, or the effects minimised because of the same close-knit community and the supportive ties a person holds in the area.

“We supported a lone parent with 4 children in emergency accommodation. She had to leave the family home due to domestic violence. They were accommodated 26 miles from the children’s school. They missed breakfast in the hotel as they had to leave so early to make school on time” SVP Member West Region

2.4 Poor Quality Housing

SVP Members visit people in their homes, both local authority housing and housing owned by private landlords. Through home visitation work to vulnerable and marginalised

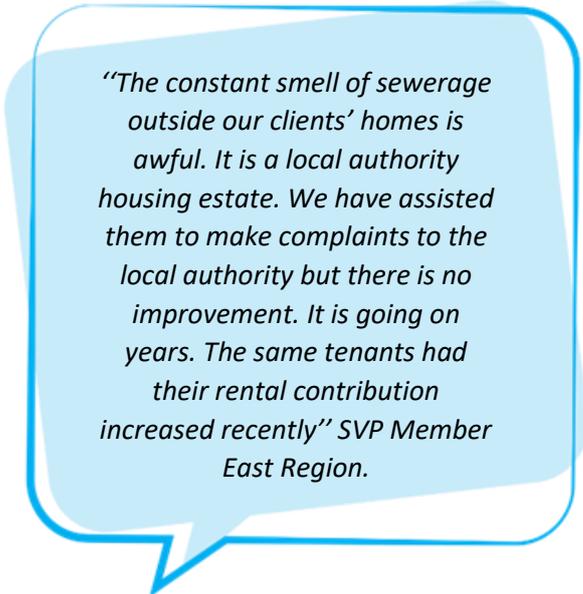
“Vera lives in a two-bedroom terraced house with one child. There is no heat, damp throughout the house and no hot water in the kitchen. The kitchen consists of an alleyway out to a backyard with no place to sit. The rent is €660 per month with the tenant paying a ‘top-up’ every month. The Council did an inspection, and the landlord inserted a heater in the kitchen but then put up the rent as a result. The tenant was told by the council – “be thankful that the landlord put in the heater” SVP Member, East Region

households members have witnessed families using their low incomes to fund repairs in their homes while going without essentials such as food. Many of the households SVP support have complex needs arising from their low incomes, poor educational opportunities, and poor health status, we consider these issues to be the most important to be addressed if people are to find a way out of poverty. Yet, many live in stressful, debilitating housing conditions that mean they live in a state of worry. They are fearful for their family’s health and wellbeing while afraid to

raise the issues for fear they may be evicted.

SVP members visiting families in their homes have reported that some people are living in very poor standards of accommodation, despite the aim of using HAP to improve standards in the PRS.

In *Stories of Struggle*, families were dissatisfied with the accommodation options in the private rented sector, because of problems with security of tenure, poor quality properties and overcrowding. For some families in private rented accommodation, there was also lower energy efficiency. Houses were poorly insulated or the method of heating the home was wasteful: “the problem is that we can’t heat it properly, especially in the bad weather” and “the big range eats up all the fuel, the house is a cold house, so I spend extra money on fuel to keep our home warm.”



“The constant smell of sewerage outside our clients’ homes is awful. It is a local authority housing estate. We have assisted them to make complaints to the local authority but there is no improvement. It is going on years. The same tenants had their rental contribution increased recently” SVP Member East Region.

Local Authorities inspecting their own housing stock remains problematic. The vast majority of social housing stock is in good quality, however, as SVP members report there are local authority housing tenants with limited incomes and resources that continue to live in poor quality housing with little hope of this improving while local authorities oversee inspecting their own properties.

For the people affected by poor housing standards they are often left feeling isolated and abandoned. This stress can last indefinitely as people fear the only other alternative is homelessness. SVP members are unfortunately all too aware what the current homeless and housing crisis is doing to families and individuals. We need to ensure more people are not affected by this crisis. People should be able to live with a sense of security and safety, and their physical and mental health should not be negatively affected by poor housing standards.

3. Key Policy Issues from the Perspective of SVP

3.1 Access to Quality and Affordable Housing

The Economic and Social Research Institute (ESRI) found that 16% of households spend more than 30% of their net income on housing, with this figure rising to 70% for the lowest quartile of the income distribution.¹⁶ Moreover, examining the period 2005-2015, they find that private renting households in the bottom 25% of the income distribution have always faced high housing costs: “While rental price inflation has been high in the very recent period, the fact that low income households in the private rental market have always had high average rental costs suggests affordability challenges are structural rather than cyclical in nature”.¹⁷

The lack of affordable housing, whether renting or buying, impacts those living in poverty the hardest. A recent ESRI report in June 2021 has recommended that “without significant investment in residential construction, we risk experiencing another decade of inadequate housing supply and resulting upward pressure on residential prices and rents”.¹⁸

The latest Locked Out of the Market Report from the Simon Communities of Ireland shows that, there were just 2,757 properties available to rent over the three days surveyed in March 2021 at any price within the 16 areas covered. This represents an 8.7% decrease from the 3,019 properties which were available to rent at any price in the December 2020 Locked Out study period. There were just 72 (2.6%) instances of those properties coming within a standard HAP rate in one of the four household categories. If the full top-up was applied there were 1055 (38%) rental properties available within the standard or discretionary Housing Assistance Payment (HAP) limits in at least one of the four household categories. In line with the fall in the total number of properties available, HAP properties saw a 9% decrease on the 1160 properties which were available within at least one household HAP category in the December study.¹⁹

¹⁶ ESRI (2018) “Exploring Affordability in the Irish Housing Market. Available online at: <https://www.esri.ie/publications/exploring-affordability-in-the-irish-housing-market/> p.6 [05 Corrigan et al PP.qxp_ESRI Vol. 50 - No. 1.pdf](#)

¹⁷ ibid

¹⁸ ESRI (2021) ESRI Special Article With ‘g’ greater than ‘r’, should we be borrowing to increase Irish housing supply? K. McQuinn. [QEC2021SUM_SA_MCQUINN_0.pdf \(esri.ie\)](#)

¹⁹ Simon Communities of Ireland (March 2021) Locked Out of the Market [Executive Summary Locked Out April 2021.pdf \(simon.ie\)](#)

Social Housing in Ireland has traditionally been the most common means of ensuring that housing is affordable for households on low incomes, as the rent paid to the local authority, or an approved housing body (AHB) is based on a person's ability to pay.

In 2016 under Rebuilding Ireland, Housing Associations were provided with a target of 15,000 of the 50,000 social homes committed to in Rebuilding Ireland by 2021. As of the end of 2020, 14,136 social homes have been delivered. The AHB sector now manages over 43,000 homes.²⁰ According to the NOAC Performance Indicators Report for 2019, the number of Local Authority dwellings in State ownership have increased to 138,905.²¹

In 2021, it is estimated that total State expenditure on the Housing Assistant Payments (HAP) will have come to €1.4 billion since the introduction of the scheme. The Housing Assistance Payment (HAP) is a current expenditure funded social support tasked with providing almost 84,000 tenancies in the private rented sector over the lifetime of Rebuilding Ireland (2016-2021).

HAP is a much more expensive form of social housing provision than direct build social housing. This will require state expenditure of approximately €1bn per annum to private landlords. In contrast, an equivalent investment in direct building by local authorities and housing associations would provide approximately 55,000 social housing units over a ten-year period and 165,000 units over a thirty-year period.²² For example, "the financing of a direct build social housing unit in Dublin through state borrowing would cost approximately €800 per month. In contrast, the monthly payment for a HAP unit in Dublin is €1,244. This means financing a HAP unit in Dublin is €5,328 more expensive to the state per annum than a new build unit. Over a thirty-year period, this equates to a HAP unit being €159,840 more expensive with no state asset to show for this money".²³

²⁰ Irish Council for Social Housing (2020) Irish Council for Social Housing Annual Report 2020 <https://icsh.ie/wp-content/uploads/Annual-Report-2020.pdf>

²¹ National Oversight and Audit Commission (NOAC) (November 2020) Local Authority Performance Indicator Report 2019 <https://noac.ie/wp-content/uploads/2020/12/NOAC-LAPIR-2019.pdf>

²² TASC (2018) No ordinary housing crisis Part 1 Rory Hearne <https://www.tasc.ie/blog/2018/06/14/no-ordinary-housing-crisis/>

²³ Reynolds, M. (2017) Cited in An absence of rights: Homeless families and social housing marketisation in Ireland, Hearne, R., Murphy M., Administration, vol 66, no.2 (2018), pp.9-31 doi: 10.2478/admin 2018-0016 DeGruyter Open

Table 1: Social Housing Build vs HAP Total 2016-Q.1 2021

Year	Social Housing Build Total	HAP
2016	2,965	12,075
2017	4,054	17,916
2018	4,798	17,926
2019	6,074	17,025
2020	5,073	15,885
Q1 2021	569	3,914

Source: gov.ie - Overall social housing provision (www.gov.ie)

Table 2: European Comparison: Social Housing Output

Country	% Social Housing
Denmark	20
UK	18
Austria	24
France	16.5
Sweden	19
Netherlands	30
Ireland	9

Source: <https://www.esri.ie/system/files/media/file-uploads/2018-06/WP594.pdf>

3.2 Preventing Homelessness and Providing Affordability in the Private Rented Sector

The Social Housing Needs Assessment shows that there are 61,880 households on the waiting list for social housing in 2020.²⁴ A CSO Analysis of the Housing Assistance Payment (HAP) Scheme indicates that almost 60,000 households in need of social housing were accommodated in the private rented sector by the end of 2019.²⁵ An SVP and Threshold research report showed that HAP is an important short-term support in allowing people access to living accommodation, however, it is not suitable in the long term due to issues arising from affordability and security of tenure in the private rented sector.²⁶ These are all

²⁴ Housing Agency (2020) Summary of Social Housing Assessment gov.ie - Summary of Social Housing Assessments 2020 – Key Findings (www.gov.ie)

²⁵ CSO (2019) Social Housing in Ireland 2019 – Analysis of Housing Assistance Payment Scheme www.cso.ie - Social Housing in Ireland 2019 - Analysis of Housing Assistance Payment (HAP) Scheme - CSO - Central Statistics Office

²⁶ Threshold and the Society of St Vincent de Paul (2019) The Housing Assistance Payment (HAP): Making the Right Impact? https://issuu.com/svp15/docs/hap_survey_report_2019/1?e=25010855/73017298

factors that can lead to homelessness and with ever increasing numbers needing to access HAP to find accommodation it remains a concern.

Private renting has been growing across many countries. In England, the private rented sector has more than doubled since the turn of the century and the rate of change has been similar in Wales and Scotland. In 2018, the private rented sector in Ireland was three times its size in 2000 and is now accommodating almost 1 in 5 households which equates to around 750,000 people currently living in the private rented sector.²⁷

Holachan & McKee (2019: 23) find four groups are most likely to experience difficulty in the rental sector. These included: those reliant on welfare benefits or low/insecure incomes; families; migrant/seasonal workers; and young professionals and students. In the Irish context, research has noted that young people are at a higher risk of discrimination, poor standards, and overcrowding. Non-EU citizens are at a greater risk of overcrowding, while African migrants are more likely to report discrimination.²⁸

Concern with rent increases and attempts to ensure greater affordability within the sector have been present since 2015. The first attempt to amend legislation in relation to these issues was with the Rent Pressure Zone legislation, introduced in 2016, to moderate price increases and to ensure predictability. The Strategy for the Rental Sector,²⁹ which introduced RPZs, set out to 'address unsustainable rent inflation' by moderating rent price increases. "Rent inflation is attributed to the lack of supply in the sector and in terms of housing more generally, and consequently the Strategy suggests that 'the most effective way to reduce and stabilize rents in the medium to long term ... is to increase supply' (Department of Housing, 2016: 2). "RPZ status, as originally formulated, was to last three years, after which it would expire. The extension of RPZ status beyond its original horizon thus suggests that the Strategy's objective to moderate rents through increased supply has not materialised".³⁰

New legislation is to come into effect in 2021 to replace how to set rent in a Rent Pressure Zone (RPZ). Section 6 of the Residential Tenancies Act 2021 provides that any rent increase in an RPZ cannot exceed general inflation, as recorded by Harmonised Index of the

²⁷ Whitehead, C. (2021) The Private Rented Sector as part of the Global Housing system in a COVID19 world. Threshold ESRI Conference July 1st 2020 [The Private Rented Sector as part of the Global Housing system in a COVID19 world \(esri.ie\)](https://www.threshold.ie/news/the-private-rented-sector-as-part-of-the-global-housing-system-in-a-covid19-world)

²⁸ Grotti et al., 2018 Cited in Security and Agency in the Irish Private Rental Sector Threshold Research [security and agency in irish private rented sector july2020.pdf \(threshold.ie\) page 17](https://www.threshold.ie/news/security-and-agency-in-irish-private-rented-sector-july2020.pdf)

²⁹ Department of Housing, Local Government and Heritage (December 2016) Strategy for the Rental Sector [Rebuildingireland.ie/wp-content/uploads/2017/05/Strategy-for-the-Rental-Sector_Mar2017-WEB.pdf](https://www.rebuildingireland.ie/wp-content/uploads/2017/05/Strategy-for-the-Rental-Sector_Mar2017-WEB.pdf)

³⁰ Security and Agency in the Irish Private Rental Sector July 2020 Threshold Research [security and agency in irish private rented sector july2020.pdf \(threshold.ie\)](https://www.threshold.ie/news/security-and-agency-in-irish-private-rented-sector-july2020.pdf)

Consumer Price Index (HICP).³¹ This should have a positive influence on the private rented sector, however, the monitoring and evaluation of the initiative will also need to be given priority to ensure success.

Concerns about the supply of rental property are echoed by McCartney,³² who has developed a method for calculating vacancy rates in the Irish private rented sector. He estimates that since 2014, the vacancy rate has remained below 2% in Dublin. Since 2015, vacancy rates outside the capital have converged with those in Dublin and were less than 1.5% in 2016. McCartney also estimates a 'natural vacancy rate' (NVR) for the Irish private rental sector. The NVR is the vacancy rate at which rental growth is zero, i.e., market equilibrium, and McCartney calculates an NVR of 5.77% for the Irish PRS nationally and 5.7% for Dublin. He concludes that until the vacancy rate returns to 5.75%, rents will continue to rise in all locations. In unit terms this equates to 18,237 units – an increase of 300% from current levels.³³

The measures introduced in response to Covid-19, such as freezing rents and banning evictions have been positive. It was previously stated that these protections were unworkable or unconstitutional. However, that has shown not be the case and SVP have advocated that those measures be extended until the end of 2021.

3.3 Understanding the Scale of the Problem by Broadening the Definition of Homelessness

A person is defined as homeless in Ireland under The Housing Act 1988 if: (a) there is no accommodation available which, in the opinion of the authority, he, together with any other person who resides normally with him or who might reasonably be expected to reside with him, can reasonably occupy or remain in occupation of; or (b) he is living in a hospital, county home, night shelter or other such institution, and is so living because he has no accommodation of the kind referred to in paragraph (a) and he is, in the opinion of the authority, unable to provide accommodation from his own resources.³⁴

³¹ Residential Tenancies Board 2021 The Residential Tenancies (No. 2) Act 2021: Changes to Rental Law [The Residential Tenancies \(No.2\) Act 2021: Changes to Rental Law | Residential Tenancies Board \(rtb.ie\)](#)

³² Savills Ireland McCarthy, J. (2017). A rent forecast model for the rental sector in Ireland. Dublin. Page 9 [a-rent-forecasting-model-for-the-private-rented-sector-in-ireland.pdf \(savills.co.uk\)](#)

³³ *ibid*

³⁴ Irish Statute Book Housing Act, 1988 [Housing Act, 1988, Section 2 \(irishstatutebook.ie\)](#)

As Bergin et. al. (2005) highlights there is no commonly agreed definition of homelessness among Local Authorities in Ireland.³⁵ They point to the level of discretion LA have in determining who they consider to be homeless, which can be impacted by the level of demand on services at a given time. The ambiguity creates difficulties for people who are 'couch surfing' or staying with someone temporarily as they are considered to have access to accommodation they can "reasonable occupy" and not deemed a priority.³⁶ The issue of overcrowding and substandard accommodation is a common issue for SVP members when they meet with clients. The definition also does not allow for situations where a person is threatened with, or at risk of becoming homeless.

At a European level, FEANTSA (the European Federation of National Organisations working with the Homeless)³⁷ have developed a typology of homelessness and housing exclusion as a means of improving the understanding and measurement of homelessness across Europe. The typology includes situations where a person is roofless, houseless, living in insecure accommodation and living in inadequate accommodation.

The understanding of homelessness and housing exclusion outlined in the FEANTSA typology, removes the ambiguity present in the Irish definition of homelessness. It would mean therefore we would have a better understanding of how to address the issue of homelessness in all its forms, including housing exclusion.

³⁵ Bergin, E., Lalor, T., Lawless, K. and Pym, M. (2005) Settlement First: Assessment of the effectiveness of the Housing Act 1988 and the Integrated Strategy 2000 in meeting the Housing Need of People who are Homeless. Dublin: Simon Communities of Ireland.

³⁶ *ibid*

³⁷ European Housing Research, UK Part E_ Responses to "The ETHOS Definition and Classification of Homelessness"
https://www.feantsaresearch.org/download/ejh6_2_resp_ethosdef14957038748931638958.pdf

Table 3: ETHOS Light- European Typology of Homelessness and Housing Exclusion

Operational Category	Living Situation	Definition
1. Roofless- People living rough	Public spaces/external spaces	Living in the streets or public spaces without shelter that can be defined as living quarters
2. Houseless- People in emergency accommodation	Overnight shelters	People with no place of usual residence who move frequently between various types of accommodation
3. Houseless- People living in accommodation for the homeless	Homeless Hostels Temporary accommodation Transitional supported accommodation Women's shelters or refuge accommodation	Where the period of stay is time-limited, and no long-term housing is provided
4. Houseless- People living in institutions	Health care institutions Penal institutions	Stay longer than needed due to lack of housing No housing available prior to release
5. Insecure- People living in insecure accommodation	Non-conventional buildings Temporary structures People living under threat of eviction	Where the accommodation is used due to a lack of housing and is not the person's usual place of residence
6. Inadequate- People living in temporary/non-conventional structures	People living in unfit housing People living in extreme overcrowding	Where the accommodation is used due to a lack of housing and is not the person's usual place of residence.

Source: <https://www.feantsa.org/download/article-1-33278065727831823087.pdf> page 28

3.4 Housing standards and increasing inspections

All rented dwellings in Ireland, public or private, are subject to a number of key regulations introduced to respond to the perceived low standard of rental housing stock in Ireland, notably the Housing (Standards for Rented Houses) Regulations 2019.³⁸

The regulations require landlords, with limited exceptions, to ensure that rental properties meet certain minimum standards regarding issues such as structural condition, sanitary facilities, heating, lighting, and ventilation.

The Local Authority have the power to carry out inspections and enforce the standards under section 18 of the Housing Miscellaneous Provisions Act 1992. Section 18A of the 1992 Act provides that where, in the opinion of a housing authority, a landlord is contravening or has contravened the standards, the authority may issue an improvement notice. It is a matter for

³⁸ S.I. 17/17- Housing (Standards for Rented Houses Regulations 2019)
<http://www.irishstatutebook.ie/eli/2019/si/137/made/en/print>

the relevant authority to decide whether to issue an improvement notice in each individual case.

Perhaps the most significant weakness of the 2019 Regulations arises in relation to their enforcement. The inspection rate of registered tenancies is considered very low at 7.39% in 2018, although this is an increase on the 4.96% recorded in 2017. The number of inspected dwellings that are found not to be compliant with the Standards Regulations continues to be high at 82.99% or 19,771 dwellings. The number of non-compliant dwellings that became compliant in 2018 was 5,466 an increase on the 2017 figure of 3,329.³⁹

Having regard to Census 2006, Kenna noted “almost 20% of local authority housing was without central heating, a higher proportion than any other tenure”.⁴⁰ Yet, more than a decade later, the provision of substandard local authority housing appears to persist.

Although failure to comply with the minimum standards can result in penalties and prosecution, it is the local authorities, as housing authorities, that are responsible for enforcing these minimum standards. Thus, as Kenna has observed, the enforcement of the standards may create a conflict of interests for a local authority where its own rented property is in issue.⁴¹

The European Committee of Social Rights ruled in 2018 that Ireland was in violation of Article 16 of the revised European Social Charter.⁴² Local Authorities failed to ensure the right to housing of an adequate standard for a not insignificant number of families. Tenants of 20 local authority housing estates took a class action, alleging that poor-quality housing was breaching their human rights. Persistent damp, mould growing inside their homes, persistent bad odours, poor plumbing, the emergence of raw sewage from pipes into their sinks and baths, and a lack of central heating, were having adverse effects on their families lives and breaching rights including of the family and children to be protected against poverty and social exclusion. In addition, they had no independent body to which they could complain to about the conditions affecting them- unlike private tenants, who can appeal to the Residential Tenancies Board. Instead, local authority tenants must complain to their own council- i.e., their landlord- about conditions that were the responsibility of the landlord to fix, in the first instance. It found the lack of an independent complaints body for local-authority tenants, had not been proven to breach charter rights. It also noted no complete statistics on

³⁹ National Oversight and Audit Commission (2018) Local Authority Performance Indicator Report <http://noac.ie/wp-content/uploads/2019/10/NOAC-Performance-Indicator-Report-2018-1.pdf>

⁴⁰ Pdraig Kenna, *Housing Law, Rights and Policy* (Clarus 2011) 750.

⁴¹ See Pdraig Kenna, *Housing Law, Rights and Policy* (Clarus 2011) p755 albeit that the discussion pre-dates the introduction of the 2019 Regulations.

⁴² Resolution CM/ResChS (2018) 1 International Federation for Human Rights (FIDH) v. Ireland Collective Complaint No.110/2014 Available at <https://rm.coe.int/0900001680784fa2>

the condition of local authority housing have been collected since 2002 by the Irish authorities and that in Ireland no national timetables exist for the refurbishment of local authority housing stock.

3.5 Addressing Rural Homelessness and Housing Insecurity

Rising rents not only impact those living in cities and the movement out of the cities to more rural parts of the country by remote workers during Covid-19 has put extra pressure on rural and smaller towns rental markets. In the Connacht-Ulster region, rents rose 4.6% in the first quarter alone of 2020, the second largest quarterly gain on record, and rents in the region are almost 8% higher than in 2019. In Munster, the increase over the last year (2020) has been greater (8.8%).⁴³ In all four regions, this reflects extraordinarily weak availability of rental accommodation.

When there is a lack of such homeless and housing services in rural or less populated areas, it affects not only individuals experiencing homelessness on a personal level, but it also impedes political action and necessary investment to prevent it. Without the required accommodation and supports, people experiencing homelessness are more likely to live in unsustainable housing arrangements thus masking the need for support and assistance from state agencies and local communities.

Limited transport services can also be a major constraint in providing solutions for homelessness in rural areas. For example, difficulty accessing transport may prevent people experiencing homelessness, or those at risk of homelessness, from accessing services that are available in the broader local area, thus finding a way out of homelessness. Limited transport services can also be a barrier to employment which can be a protective factor from the threat of homelessness.

The causes of homelessness in rural areas from SVP's member experience, are broadly similar to those of urban homelessness and relate to poverty, inequality and a lack of affordable housing as well institutional failures and personal circumstances. Structural issues, outlined above, such as poverty, inadequate transportation, limited access to emergency accommodation and services like mental health, make it particularly difficult for people experiencing homelessness in rural areas.

Many of the people supported by SVP are being neglected by traditional measures to address homelessness, for example, through official homeless statistics. This creates an inequity in being able to provide advice, assistance, and accommodation. Helpful initiatives

⁴³ The Daft.ie Rental Price Report An analysis of recent trends in the Irish rental market 2021 Q1 [2021-Q1-rental-daftreport.pdf](https://www.daft.ie/rental-price-report-2021-q1)

to address the needs of people experiencing homelessness would include broadening the definition of homelessness to include those in temporary, insecure and/ or substandard accommodation, increasing outreach and mainstream supports such as addiction and mental health facilities to all in rural areas.

Utilising vacant housing in rural areas can help to provide responses to local homelessness. The East Cleveland Youth Housing Trust⁴⁴ provides housing and training for 16–25-year-olds living in rural communities in East Cleveland in England through the renovation of empty properties. The Trust was established in 2000 following local needs analysis showing that local young people generally wished to stay in the area but felt unable to do so because of a lack of suitable, affordable housing and training opportunities. The Trust develops and manages affordable, supported accommodation. At the same time, it provides training in construction through the renovation of empty properties.

The Housing First model offers the provision of permanent and affordable housing to tackle homelessness, and then provides the appropriate wraparound supports including connections to community-based supports to ensure people maintain their housing and gain access to supports to improve their health and well-being.⁴⁵ The key to Housing First is providing direct access to long-term housing and then supporting the person in their home with intensive housing and health supports. People experiencing homelessness with high support needs around mental health and substance use face multiple barriers to exiting homelessness and this contributes to a cycle of rough sleeping, hostel use and high usage of hospital emergency departments.

4. Will “Housing for All” Deliver for the People SVP Assists?

SVP welcome the publication of the much-anticipated Housing for All plan. As an organisation we share its overall objective, that is: “Everyone in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life”. The overall targets set out in the Strategy provide for 90,000 social homes, 36,000 affordable homes, 15,000 cost rental homes and 156,000 private homes.

⁴⁴ East Cleveland Youth Housing Trust End of Year Report 2018 [ECYHT - About - East Cleveland Youth Housing Trust \(ecyhtrust.com\)](https://www.ecyhtrust.com)

⁴⁵ Government of Ireland Housing First National Implementation Plan 2018-2021 [Housing-First-Implementation-Plan-2018-2021-final.pdf \(homelessdublin.ie\)](https://www.homelessdublin.ie)

We welcome the commitment for an All-Government approach to the delivery of the plan, ongoing engagement and consultation with stakeholders and the commitment to submit quarterly progress reports to the Cabinet Committee on Housing and to the Government. This focus on collaboration and oversight will be necessary to ensure the plan is implemented fully.

While the plan outlines many of the issues faced by low- income households that SVP assist, we are concerned that it lacks detail and a clear implementation plan, particularly on measures needed to address homelessness and prevent it occurring in the first place.

The plan is based on four pathways:

1. Support home ownership and increase affordability
2. Eradicate homelessness, increase social housing delivery, and support social inclusion
3. Increase new housing supply
4. Address vacancy and make efficient use of existing stock.

In this section we assess the plan in four key areas as they relate to the housing crisis seen first-hand by the members of the Society of Saint Vincent De Paul:

4.1 Increasing the Supply of Social Housing

SVP welcome the increased targets for social housing provision in the plan. In our previous submissions and stakeholder engagements with the Minister we have highlighted the need to increase the building of social homes, it is very encouraging that this is in the new plan. We have strongly recommended to the Minister that this is the most viable and most beneficial manner to ensuring low-income households gain access to a home. In the Rebuilding Ireland plan, “just 15%, or 20,580 were new builds by Local Authorities and Housing Associations”.⁴⁶ In the Housing for All plan, there is a commitment to deliver 90,000 new social homes to 2030. It will include an average of 9,500 new builds each year.

We also welcome the commitment to annual funding until 2026, this should prevent delays arising from funding constraints for much needed homes being built. In Rebuilding Ireland funding was not secured for the full implementation of the plan and this did lead to delays in getting housing projects started.

⁴⁶ TASC (2018) No ordinary housing crisis Part 1 Rory Hearne
<https://www.tasc.ie/blog/2018/06/14/no-ordinary-housing-crisis/>

What is in the plan for the people SVP assist?

Delivery of over 10,000 new social homes per year to 2030. This will include an average of 9,500 new builds.
Revision of income eligibility for social housing
Provide continued funding for housing for specific vulnerable cohorts, such as housing for older people and people with a disability, through the Capital Assistance Scheme and other social housing schemes
Establish a Commission on Housing and Hold a Referendum on Housing
Reform the differential rent system and introduce a national scheme, which will standardise differential rents across the country to ensure fairness
Roll Out of Choice Based Letting for Social Housing
Enhanced supports to Local Authorities for the Buy and Renew and Repair and Leasing Scheme of the Social Housing Programme

Whilst the increased targets for the building of social homes is very welcome, the targets are likely to be insufficient to meet the needs of low-income households who urgently require secure accommodation. The plan also lacks clear delivery mechanisms. With regard to the 90,000 social homes to be delivered by 2030, it will not be enough to address the scale of the crisis. In the Housing for All plan the target for 2022 is 9,000. From 2026 to 2030 the target is 10,200 homes per year. Given the scale of the problem with 61,880 households on the social housing lists and almost 60,000 in HAP tenancies,⁴⁷ the Strategy targets are not ambitious enough. It also does not consider the numbers outlined above in the report who are affected by other forms of insecure accommodation. Also, funding for the building of 90,000 homes is only secured until 2026.

The projected new housing output from the private rental and private ownership exceeds the output of social and affordable homes. While the use of the private sector to solve the housing and homeless crisis is needed, we are concerned it will continue to be used in an unbalanced manner, thus keeping house, and rent prices high as they will be largely determined by market forces.

⁴⁷ Housing Agency (2020) Summary of Social Housing Assessment [gov.ie - Summary of Social Housing Assessments 2020 – Key Findings \(www.gov.ie\)](https://www.gov.ie/en/publications-and-statistics/publications/summary-of-social-housing-assessments-2020-key-findings/)
HAP Exchequer Spend Landlord Payments 2019-2020 [gov.ie - Overall social housing provision \(www.gov.ie\)](https://www.gov.ie/en/publications-and-statistics/publications/overall-social-housing-provision/)

An estimated 40,000 workers are involved in delivering 20,000 homes per annum currently. This will need to increase by a further 27,500 workers to hit the overall target of 33,000 homes per annum.⁴⁸ A further increase, possibly up to 80,000 workers may be necessary.⁴⁹ The Government plan to attract new apprentices to the construction sector, however, they will take 4-6 years to be fully trained and skilled in their chosen trade. They also plan to recruit overseas workers through international jobs fairs. However, with the shortage of accommodation for them to locate to in Ireland, it is uncertain if this will be workable.⁵⁰

Table 4: Projected Housing Output (New Build) 2022-2030

Tenure	2022	2023	2024	2025	2026	2027	2028	2029	2030
Social Homes	9,000	9,100	9,300	10,000	10,200	10,200	10,200	10,200	10,200
Affordable & Cost Rental Homes	4,100	5,500	6,400	6,400	6,100	6,300	6,400	6,300	6,300
Private Rental & Private Ownership Homes	11,500	14,400	17,750	18,200	19,800	20,400	21,500	23,000	24,000
Total Homes	24,600	29,000	33,450	34,600	36,100	36,900	38,100	39,500	40,500

Source: Housing For All: A New Housing Plan for Ireland-Executive Summary gov.ie - [Housing for All - a New Housing Plan for Ireland \(www.gov.ie\)](http://www.gov.ie)

What is missing?

- The targets for social housing need to be increased to an average of 15,000 per year to meet current demand and reduce the reliance on housing supports such as RAS, RS and HAP to accommodate low-income households. Those targets would be challenging to achieve, particularly given the low numbers of construction workers available at the moment to build those homes. However, it would provide a

⁴⁸ Housing for All: A New Housing Plan for Ireland-Executive Summary gov.ie - [Housing for All - a New Housing Plan for Ireland \(www.gov.ie\)](http://www.gov.ie)

⁴⁹ Housing for All: A New Housing Plan for Ireland 3. Pathway to Increasing New Housing Supply gov.ie - [Housing for All - a New Housing Plan for Ireland \(www.gov.ie\)](http://www.gov.ie)

⁵⁰ Morning Ireland Radio Programme 3/09/21 where will the workers come from? Brian Coogan, CEO of the Irish Plant Contractors: workers not there and cost of construction [Where will the builders come from? | Morning Ireland - RTÉ Radio 1 \(rte.ie\)](http://www.rte.ie)

much more realistic figure of what is actually needed and ensure the State is investing in their own housing stock for the future rather than continuing to look to the private rented sector.

4.2 Homelessness and Housing Exclusion

There are some useful practical measures outlined in the plan on homelessness that are to be welcomed. For example, the Dublin Region Homeless Executive (DRHE) will pilot a scheme to convert Local Authority and AHB emergency accommodation to own-door permanent social housing tenancies. This will give families and individuals some autonomy over their lives while experiencing homelessness. The pilot should not be delayed and evaluated promptly so that if successful can be replicated in other parts of the country.

The commitment to develop a Youth Homeless Strategy is positive and is a measure SVP have advocated to the Department of Housing to pursue. We have drafted a document as part of the Irish Coalition to End Youth Homelessness on the unique challenges facing young people while homeless and solutions needed to prevent homelessness occurring for them.⁵¹ Currently, there is little provision in housing policy to address their needs and circumstances. The Strategy should outline plans to address the policies that disadvantage young people and make them at increased risk of experiencing homelessness, focus on Housing First for young people and implement and strengthen prevention and early intervention measures to prevent homelessness occurring in the first place.

What is in the plan for the people SVP assist?

Increased 'Housing First' targets to 1,200 occupancies over five years
A new National Homeless Action Committee
Personalised Integrated Healthcare for people experiencing long term homelessness
Enhanced family support and prevention and early intervention services for children and their families through a multi-agency and coordinated response, and disseminate innovative practice
Identify and provide enhanced tenancy sustainment supports to families experiencing long-term homelessness to help them exit homelessness and maintain their homes
Prepare and publish guidelines with standards for the development and refurbishment of emergency accommodation

⁵¹ Irish Coalition to End Youth Homelessness Call for Government Action on homelessness among young people 2019 [iceyh_call_for_government_action.pdf \(endyouthhomelessness.ie\)](https://www.endyouthhomelessness.ie/iceyh_call_for_government_action.pdf)

The Dublin Region Homeless Executive (DRHE) to pilot a scheme to convert Local Authority and AHB owned emergency accommodation facilities to own-door permanent social housing tenancies.

Make improvements in the quality and quantity of Traveller specific accommodation

A Youth Homeless Strategy will be developed in 2022

The plan supports the implementation of the White Paper on Ending Direct Provision and continues the support for the Irish Refugee Protection Programme⁵²

It is welcome that, for the first time since 2008, a Government plan states it will work towards eradicating homelessness. However, SVP are disappointed that the language used and commitments surrounding ending homelessness are not much more ambitious, given the successful measures that were introduced to prevent and reduce homelessness during Covid-19. Nevertheless, we welcome that the proposals to establish a National Homeless Action Committee and in conjunction with the All-Government Cabinet overview mechanism, it is possible to develop and implement a holistic plan with clear timelines and actions across Government that will make an end to homelessness a reality.

While the enhanced tenancy supports for families in long term homelessness to access Emergency Accommodation is welcome, the main support to those families will continue to be through Homeless HAP which can often leave families at risk of homelessness in the future. As the largest group assisted by SVP, it is concerning that there is no recognition of the additional vulnerabilities faced by some vulnerable groups who are over-represented in the homeless population, such as lone parent families, while living in emergency accommodation. We are also disappointed there are not specific measures to address those experience homelessness and housing insecurity in more rural areas of the country.

Overall, SVP are concerned about the lack of emphasis in the plan on child and family homelessness. It has been well documented the devastating effects that homelessness can have on babies' children and young people. According to Wang (2017) , family homelessness is a 'severe form of poverty', leading to increased vulnerability to traumatic life experiences and systematic challenges, which rob children and families of their basic human rights and capabilities.⁵³ The plan gives little focus to their needs or how they can be met while living in emergency accommodation. SVP members have continuously highlighted the

⁵² Read SVP submission on the Government White Paper on Direct Provision which includes our proposals for the housing needs of those seeking international protection
<https://www.svp.ie/getattachment/429eb25b-d14a-455e-8802-60e55c0bbb2b/SVP-Submission-on-Government-White-Paper-on-the-In.aspx>

⁵³ Wang J.J (2017) Reducing Family Homelessness and Improving Child Outcomes: A Housing First Approach Washington and Lee University

need for increased supports for families living in emergency accommodation: Some of those support include:

- A streamlined, coherent process to access support for children going to school irrespective of where emergency accommodation is located in the country.
- Access to cooking and laundry facilities while living in emergency accommodation for all families, irrespective of what type of emergency accommodation they are assigned.
- A discretionary fund available for families for assistance with additional costs associated with living in homeless accommodation and to assist with children's emotional wellbeing.

SVP notes the recent adoption of the EU Child Guarantee by the European Parliament which requires the 27 EU Member States to work towards the implementation of six commitments including ensuring effective access to adequate housing for children in disadvantaged circumstances.⁵⁴ It also identified children experiencing homelessness as a key target group for action of the areas related to education, nutrition, early years care, healthcare, and school meals. Importantly it includes the provision for Member States to assess and revise national, regional, and local housing policies to take actions to ensure the interests of children in need and their families are duly considered.⁵⁵ Working with the Department of Children, the Department of Housing has an opportunity to address the gaps identified above to ensure that Housing for All and subsequent sub-strategies are child and families centred in their approach.

What is missing?

- A commitment to end Homelessness by 2030 with clear and ambitious targets to achieve that objective.
- Expanding the Housing First programme for families.
- A commitment to provide specific resources and supports, outlined above, to all families while living in emergency accommodation.
- A clear commitment to end the practice of 'self-accommodation' for families.

⁵⁴ European Commission, Proposal for a Council Recommendation establishing the European Child Guarantee, Brussels, 24.3.2021 COM(2021) 137 final, 1

⁵⁵ Children's Rights Alliance (2021) EU Child Guarantee FAQ https://www.childrensrights.ie/sites/default/files/information_sheets/files/European%20Child%20Guarantee%20June%202021.pdf

- Government Departments and Agencies that work with families not specifically named in the plan (for actions 3&4 above) - Department of Education, Department of Social Protection, Community Welfare Service.
- A comprehensive plan detailing homeless prevention measures such as, a ban on no fault evictions from the private rented sector until those currently homeless are accommodated in homes owned by Local Authorities and AHBs.
- There is no reference to broadening the definition of homelessness in the plan. Nor is there a comprehensive plan to improve data capture on housing exclusion and homelessness across Department and statutory agencies. It is impossible to make informed policy if you don't have the data. Therefore, a commitment by the Department of Housing to use the ETHOS Light-European Typology of Homelessness and Housing Exclusion would have supported this objective.
- A strategy to address Rural Homelessness outlining clear mechanisms of how to address the unique issues faced by people living in rural Ireland affected by homelessness and housing exclusion.

4.3 Providing Affordability in the Private Rented Sector

With one in five households now currently living in the private rented sector, the plan needs to be strong and robust on the measures needed to ensure security of tenure for those people. As a result, it is disappointing that there is not a greater focus on the issues within the sector, rather it is dealt with as a cross cutting issue in the plan and not as a stand-alone issue.

We welcome the commitment to create indefinite tenancies, there is little detail however, on how that will be implemented. It is encouraging to see that the rent limit flexibilities in the Rent Supplement Scheme will be retained. This was a welcome measure during Covid-19 while people were struggling financially, and it is encouraging to see that the Government are aware that many people continue to live on inadequate incomes.

What is in the plan for the people SVP assist?

An average of 2,000 new cost rental homes every year, with targets of rents being at least 25% below market level (For households not availing of HAP)
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Extend Rent Pressure Zones (RPZ) protections to end 2024 and link rent increases to Harmonised Index of Consumer Prices

New regulation of short -term lettings through a Failte Ireland registration system

Indefinite tenancies to strengthen security of tenure

Retain the rent limit flexibilities in the Rent Supplement Scheme

Undertake an analytical exercise to examine whether an increase in the level of discretion available to Local Authorities under HAP is required, in order to maintain adequate levels of HAP support

Carry out a review of the Rental Accommodation Scheme to consider the role of the Scheme in the private market taking account of the HAP and AHB participation by the end of 2022

As the plan continues its reliance on HAP and the private rented sector to accommodate low-income families, it is positive that there is a commitment to examine whether an increase in the level of discretion available to Local Authorities under HAP is required. However, this falls short of what is needed. SVP have advocated for a complete review of HAP and its interaction with the private rented sector. We advocate that the HAP limits need to be examined to ensure they are adequate to meet market rents as well as the unique challenges some vulnerable groups face while trying to find accommodation in the private rented sector need to be examined. Also, how HAP is operated in practice is very problematic for low-income households. The length of time to process applications, the payment of rent from the date the application is processed as opposed the date the tenancy is commenced, the payment of rent in arrears, and the non-payment of a deposit all need to be addressed to reflect the realities of the private rental market.

The rollout of the cost-rental model, as anew housing tenure, with affordable rents and lifetime security is very significant. It is incomprehensible however, that the cost rental model is not available to people availing of a state subsidy for housing such as HAP. For the people that SVP assist, scaling up and allowing them access the scheme is vital: Under the Affordable Housing Act 2021 tenants reliant on HAP cannot access Cost Rental. This is intended to provide affordable housing for the households above the social housing income thresholds, however, while there continues to be inadequate numbers of social housing being built, low-income households will be further marginalised and excluded from accessing secure housing.

The plan is weak on the measures needed to prevent homelessness for people living in the private rented sector. There are no immediate supports outlined that would assist households that are at imminent risk of losing their tenancy. For example, SVP have recommended a joint budget line and protocol be implemented between the Department of Social Protection and the Department of Housing for households at risk of losing their rented accommodation. Also, whilst the ability of SVP clients to access Homeless HAP has been

extremely successful as a homeless prevention measure, it is not available to people located outside of Dublin.

What is missing?

-Increase supports and financial assistance for tenants at risk of losing their tenancy in a timely manner. We support many households who are paying unsustainable top-ups on top of their differential HAP rent payment. It is putting them at increased risk of accumulating rent arrears and as a result putting their tenancy at risk.

- Complete a full review of the Housing Assistance Payment (HAP) and its interaction with the Private Rented Sector. Issues that need to be examined include, the use of HAP top-ups among low-income households, insecurity of tenures, private rented accommodation standards, refusal of some landlords to accept HAP, HAP in practice, increasing cost to the State Exchequer and HAP arrears.
- Allowing applicants availing of the HAP scheme access cost rental accommodation.
- Increased output of 8,000 cost rental units per annum.

4.4 Housing Standards and Inspection

In the plan there is a clear lack of urgency to address the issue of poor standards in local authority housing and in the private rented sector. The measures proposed such as introducing a planned maintenance approach for Local Authority stock management and minimum building energy rating standards for private rental dwellings are not set to be implemented until 2024 and 2025 respectively. This is unacceptable for the households who are currently living in cold, damp and energy inefficient homes.

SVP welcomes the focus in the plan on the retrofit of 36,500 Local Authority homes by 2030, however, with approximately “50% of all social housing having an energy rating of D or less”⁵⁶ which equates to approximately 70,000 units, the number of homes involved in this initiative is too low.

The proposal to task a new Commission on Housing to examine the potential for independent regulation of the social housing sector is welcome. It is also positive that a planned maintenance approach for local authority stock is to be introduced. It is not only tenants that suffer from poor quality accommodation, but the costs also increase for the

⁵⁶ Home why public housing is the answer Eoin O’ Broin 2019 Merrion Press Dublin Ireland

State Exchequer as there is no coherent framework across all Local Authorities to regularly provide maintenance to housing stock, thus increasing costs in the long term.

What is in the plan for the people SVP assist?

Introduce a Planned Maintenance approach for Local Authority stock management and maintenance
Work with relevant department and Local Authorities to move to a position where housing revenue at Local Authority level is ring-fenced to ensure its retention for housing management and maintenance
Minimum Building Energy Rating standards for private rental dwellings, commencing in 2025
Task the Commission on Housing to examine the potential for independent regulation of the social housing sector
Retrofit 2,400 social homes in 2021, 750 of which relate to the Midlands Retrofit Pilot
Increase funding to Local Authorities in order to retrofit 36,500 Local Authority homes to a B2/cost optimal Building Energy Rating (BER) by 2030.
Introduce a targeted energy efficiency retrofit scheme for AHBs

What is missing?

- Stronger commitments and much greater detail on the measures needed to improve energy efficiency standards in the private rented sector. SVP recommend that minimum standards in the private rented sector should be implemented alongside an awareness-raising campaign, incentives for landlords that are conditional on enhanced security of tenure.
- Clear proposals on how to achieve a 25% inspection rate by Local Authority staff of private rented accommodation. This is in the context that the target to meet a 25% inspection rate was not met by 2021 as per the previous Government housing plan.⁵⁷ This measure needs to be progressed in conjunction with improving energy efficiency standards in the private rented sector and additional funding to carry out inspections.

⁵⁷ Houses of the Oireachtas, Private Rented Accommodation Debate Friday 6th September 2019 [Private Rented Accommodation – Friday, 6 Sep 2019 – Parliamentary Questions \(32nd Dáil\) – Houses of the Oireachtas](#)

5. Conclusion

Homelessness and housing exclusion can have a devastating effect on those that it touches and makes achieving one's potential a difficult obstacle to overcome. This report shines a light on the sometimes-hidden aspects of the housing crisis as seen by SVP members. Our experience also affords us a unique opportunity to highlight the key challenges and opportunities to address homelessness and housing exclusion, some of which are reflected in the Housing for All plan.

As well as the required investment, policies, legislation and political will needed to carry out the actions in the plan, further commitments outlined in this report will be required to ensure the Housing for All objectives are realised. The need for increased targets for the building of social homes is urgently needed. Whilst the targets for new build social housing have increased since the previous housing plan, the scale of the crisis remains. A much greater focus on the supports and resources needed to prevent homelessness occurring is required. It is encouraging to see through the plan the understanding from Government that homelessness is a crisis occurring in Irish society. We now need an ambitious plan to end homelessness for those that are currently living in emergency accommodation and pursue the necessary measures to prevent homelessness occurring. It is regrettable that this measure cannot be realised fully until we understand the scale of the homeless crisis and it is disappointing that a broader definition of homelessness, as found in other European countries, isn't included in the plan.

We welcome the proposal by Government to introduce minimum energy efficient rating standards for the private rented sector. We would urge that this commitment be undertaken much sooner given the high numbers of people living in poor standard accommodation, which is having a debilitating effect on their lives. The reforms to the planned maintenance of Local Authority homes are welcome as well as the setting up of the Commission on Housing. The Commission should provide a much-needed opportunity to discuss and reflect on the future of Irish housing policy beyond the current plan.

SVP look forward to continuing our working relationship with the Department of Housing and the Minister for Housing in progressing the need for low-income households' access to secure, safe and affordable homes. We want and need to see the Housing for All plan work for those that we assist.