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1. Introduction

SVP's submissions to the National Homeless Action Committee (NHAC), is based on the experience of our 10,000 members across the country. SVP have a unique insight into the current reality of people experiencing homelessness and housing exclusion, 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 and housing exclusion. 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, homelessness and homeless prevention, drawing on the experience of members and policy analysis to seek to bring about the necessary policy change.

While the focus of this submission will not be on the issue of building more social and affordable homes, our members view it as a key measure to prevent homelessness occurring and it will continue to be part of our core policy and advocacy efforts.

The insights from this submission are heavily focused on a recent SVP member's event held online in January 2022 to coincide with the publication of the Housing for All plan. The SVP Social Justice Network was established in 2017 as a way to identify the issues people SVP assist are facing and the key social justice areas of concern for SVP volunteers working in communities across Ireland.

The last two years have been challenging for everyone with the onset of the Covid-19 pandemic, particularly for people who were experiencing homelessness or were at risk of entering homeless accommodation. However, the recognition of our Government, the Department of Housing and NGO organisations in that regard, and the work undertaken to reduce the affects, and the number of people affected is to be commended. It has also given us valuable insights into what works and what can be achieved to prevent homelessness occurring for households. We now need to continue to implement ambitious and necessary policy and legislative changes so that we can continue to work towards achieving an end to homelessness.

This submission outlines some of those necessary policy and housing practice changes that need to take place.

2.SVP experience of the issues for households at risk of becoming homeless

In order to prevent homelessness occurring, it is important to understand what are the issues that are leading people to experience homelessness or at increased risk of entering homeless accommodation. The following are all issues as experienced by members in the course of their work with households.

2.1 Rising Rents and the performance of the Housing Assistance Payment (HAP) in housing policy and practice

At the Social Justice Network/Housing for All event, members from the across the country spoke about the impact of rising rents and the high cost of living on the low-income households that SVP assists. The impact of HAP top-ups on the financial situation of families was particularly acute. The priority for families is to pay the rent and keep a roof over their head. According to the participants, this leaves little or nothing for food/utilities and is increasingly one of the main reasons for contacting SVP for help. There was concern among members that this issue is not sufficiently acknowledged or understood by Government, the Department of Housing or the wider public. It was felt that because households are prioritising paying the rent above other bills, it was to some extent masking a much more serious and major issue around the levels of debt and financial worry people in the private rented sector are enduring.

In SVP's experience, rising housing costs have becoming increasingly a driver of poverty and deprivation among the households we support, and homelessness can occur as a result. The latest CSO figures published in December 2021, estimate that 22.7% of people living in subsidised rented accommodation were living below the poverty line before rent was factored in.¹ Once rent has been considered, the proportion of subsidised households living

"A family we are assisting is facing a rent increase of €400 from January 2022. It is due to increase from €800 to €1200"

*Social Justice Network Workshop Participant
Jan 2022*

in poverty increases to 55.9%.² This is almost two and a half times higher than before it was deducted.

In 2019, Threshold and SVP conducted a research report on the Housing Assistance Payment

¹ Central Statistics Office (CSO) December 2021 'Survey on Income and Living Conditions (SILC) 2020' [Introduction and Summary of Main Results - CSO - Central Statistics Office](#)

² Central Statistics Office (CSO) December 2021 'Survey on Income and Living Conditions (SILC) 2020' [Introduction and Summary of Main Results - CSO - Central Statistics Office](#)

(HAP).³ It found that 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.

We know from our members and from wider research that the overwhelming number of households who are becoming homeless had their last stable home in the private rented sector, and the crisis in 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.⁴

The Simon Communities of Ireland quarterly Locked Out report has found that there was just one property available to rent for a single person within HAP limits. Overall, there was only 190 properties available under a standard or discretionary limit in at least one of the four categories. This represented a decrease of 79% on the 906 properties which were available within at least one HAP category in the June study. Across all of the areas surveyed, only 1,017 properties were available to rent at any price in October. This is a decrease of 54% from the 2,208 properties which were available to rent in the June 2021 Locked Out report.⁵

SVP members regularly intervene to try and prevent homelessness in the first instance. This usually occurs where households are struggling financially due to the shortfall between the Housing Assistance Payment (HAP) or Rent Supplement (RS) and actual rents in the private rented sector.

³The Society of Saint Vincent De Paul & Threshold June 2019 'The Housing Assistance Payment (HAP): making the right impact? [HAP Survey Report 2019 by SVP Ireland - Issuu](#)

⁴ Focus Ireland 13th June 2019 Press Release [FOCUS IRELAND REPORT FINDS THAT NEARLY 70% OF FAMILIES BECOMING HOMELESS IN DUBLIN HAD THEIR LAST HOME IN THE RENTAL SECTOR - Focus Ireland](#)

⁵Simon Communities of Ireland (18th November 2022) Press Release [79% decrease in properties available to rent in October for those on housing supports as supply in the private rental market worsens - Simon Communities of Ireland's Quarterly 'Locked Out' Report finds - Simon Communities in Ireland](#)

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 and other daily expenses such as childcare and food costs.

The transition to more permanent housing can be difficult for vulnerable households and many of the individuals and families supported by members were expected to navigate the rental market without support. The importance of supporting individuals and families in this transition stage was mentioned by members. They highlighted 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 wasn't a known local source of support or it didn't exist, the Conference felt like the first and last point of help for families facing homelessness.

Whilst it is welcome that the Housing for All plan outlines a commitment to undertake an analytical review of HAP discretionary limits, in our experience this will not go far enough to preventing households becoming homeless. HAP is an important short to medium term support in enabling people find accommodation, however, a complete review of the scheme is needed urgently.

In particular measures that need to be examined include the following; HAP limits need to be examined and increased to reflect market rents, how the discretionary aspect of the 20% uplift is administered by all Local Authorities, an examination of the unique challenges faced by some groups availing of HAP and requiring accommodation in the private rented sector and how HAP is administered in practice, such as delays in processing applications and the non-payment of a deposit all need to be review.

2.2 Homeless Prevention Measure/Policy Response

1. A complete review of HAP and its interaction with the private rented sector is needed to ensure it can support households find and sustain accommodation:

- The roll out of an information and awareness campaign to educate landlords on HAP and the equality legislation is recommended. An investigation into landlord and agent refusal to accept HAP should also be included in a review of HAP.

-The SVP and Threshold report shows that some Local Authorities are not awarding the 20% uplift despite recipients receiving it in previous tenancies. All Local Authorities should provide the 20% uplift where a household requires it to improve affordability and as a homeless prevention measure.

-The length of time to process applications, inadequate support to assist some households to fill out the HAP application form, the payment of rent from the date the application is processed as opposed to the date the tenancy 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 market.

2. Increase the Housing Assistance Payment (HAP) and Rent Supplement (RS) limits so that they are kept in line with market rents and extend the 50% Homeless HAP rate to all Local Authorities.

3 .Funding for Homeless Prevention

SVP members are of the firm belief that preventing people entering homeless accommodation should become even more of a focus for Government and the Department of Housing as the homeless crisis continues into another year. Therefore, funding should be more evenly distributed between the provision of homeless services and homeless prevention than is currently the case. For example, the Dublin Region Local Authority Financial Report for 2020 shows that €27,058,756 was spent on supported emergency accommodation for families, while for the same period, €6,682,860 was spent on homeless prevention, tenancy sustainment and resettlement support's.⁶

3.1 Homeless Prevention Measure/Policy Response

Increase funding for homeless prevention measures and ensure funding is evenly distributed between homeless prevention and tenancy sustainment measures, and the provision of necessary homeless services.

⁶Department of Housing, Local Government and Heritage 2020 'Dublin Region Local Authority Homelessness Financial Report End of Year 2020' [gov.ie](http://www.gov.ie) - [Homelessness Financial Report End of Year 2020 - Dublin](http://www.gov.ie) (www.gov.ie)

4. Rent Arrears

Members are also working with individuals and families who are at risk of becoming homeless due to an accumulation of rent arrears. From our experience, there is an immediate and achievable objective to prevent these tenants becoming homeless in the first place.

The following are some of the issues we have identified that has resulted in a household at risk of becoming homeless which we believe is not fully acknowledged or recognised in housing policy or practice:

1. Suspension of Rent Supplement payment to landlord due to failure to provide all of the necessary documentation within a short timeframe.
2. Suspension of Housing Assistance Payment to landlord when a household falls into arrears on the differential rent paid to the Local Authority.
3. Refusal of Rent Supplement when Housing Assistance Payment has been suspended.
4. Refusal of an Exceptional Needs Payment for the full payment of rent arrears to a landlord which arise as a result of suspension of HAP or Rent Supplement. This is particularly urgent when a landlord agrees to withdraw a valid notice of termination on condition of the rent arrears being cleared.
5. Individuals and families being advised that they cannot access additional supports such as Homeless HAP and Placefinders Services until they have left their current accommodation, have presented as homeless and are seeking emergency accommodation.
6. Lack of clarity as to whether a household who has had their HAP suspended can access emergency accommodation if they become homeless.

The commonality among all of those types of situations is that members are working with vulnerable and marginalised households, who now are dealing with the added worry of losing their home. Language barriers and a distrust of state services and agencies compounds the issue further. Working with households dealing with the above issues has become particularly acute in the last two years in member's experience, and it is now vital that every measure that can prevent homelessness should be exhausted on a human and cost-effective level.

“Paula 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 her with eviction for non-payment of rent. She and her family are fearful and scared for their future.” SVP Member, East Region”

4.1 Homeless Prevention Measure/Policy Response

1. Ensure that the Department of Housing, Local Government and Heritage and the Department of Social Protection work together to identify and support households at risk of losing their rented accommodation.
2. Develop a joint budget line and protocol between the two departments to provide financial and tenancy support services in a timely manner to prevent vulnerable households from entering homelessness.
3. If a tenant, who is engaging with the local authority falls into arrears, a realistic repayment plan should be worked out to clear the arrears over time with the local authority. The local authority should pay the arrears to the landlord to prevent the household entering homelessness.

5. Hidden Homelessness

The issue of hidden homelessness was a strong theme during the discussion groups at the Social Justice Network/Housing for All event. Before the Covid-19 pandemic, volunteer members visited people in their homes, both local authority and private rented accommodation. It is a unique aspect of the work that they do and provides them an opportunity to meet people in their homes and get a glimpse of people's daily realities. Many of the people they meet are not considered 'homeless' under current housing legislation. However, the reality is much different as members see the hardship people are enduring, often having to couch surf or live in overcrowded family homes. Members gave examples of visiting numerous households where three generations of the one family were living in

overcrowded conditions, often times also experiencing complex and challenging health issues. In some cases, the individual or family involved do enter homeless accommodation as their living situation is no longer sustainable.

Homelessness and Housing are intrinsically linked. The Summary of Social Housing Assessments 2020 show that there are over 20,000 individuals and families on the social housing waiting list doubling up or tripling up with friends or family.⁷ Wider data and research also shows that there are many more people living in precarious living situations, thus leaving them at increased risk of entering homeless accommodation. For example, recent research from Focus Ireland highlight how some women and children cannot leave domestic violence refuges because they have nowhere else to go to.⁸ We also know from engaging with domestic violence advocacy organisations that there is no proper data capturing system to understand the full extent of the issue. Services have also stated that the lack of move on options is having an impact on their capacity to accommodate people needing the service as well they are hearing that families are not seeking refuge for fear of not being able to move on. In the absence of networked, real time systems, it is impossible at the moment to quantify this.⁹ Our members also support individuals and families living in direct provision. Despite living in temporary accommodation, they are almost 7,000 asylum seekers not considered homeless under current legislation.¹⁰ While not all of those individuals will require accommodation in Ireland, it is appropriate to assume that for many of those, living in direct provision is not considered their long term accommodation.

Understanding and knowing the extent of people experiencing housing insecurity matters to SVP because without this information, homelessness cannot be prevented. The monthly data reports published by the Department of Housing count people in local authority managed emergency accommodation. As such, they do not provide a comprehensive picture of the number of people who are homeless. Most European member states¹¹ use the ETHOS Light Classification of homelessness which has six operational categories: people

⁷ 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)

⁸ Focus Ireland Maycock P. & Neary F. November 2021 'Domestic Violence & Family Homelessness' <https://www.focusireland.ie/knowledge-hub/research/>

⁹ Discussion with Lisa Mariman Safe Ireland Services Development Manager 14th January 2022

¹⁰ Houses of the Oireachtas Thursday, 22nd April 2021 'Direct Provision Statements' [Direct Provision: Statements – Dáil Éireann \(33rd Dáil\) – Thursday, 22 Apr 2021 – Houses of the Oireachtas](#)

¹¹ ETHOS Light European Typology of Homelessness and Housing Exclusion 2017 "A Harmonised Definition of Homelessness for Statistical Purposes" [fea-002-18-update-ethos-light-0032417441788687419154.pdf \(feantsa.org\)](#)

living rough, emergency accommodation, homeless accommodation, those in non-conventional dwellings, and those with family and friends due to a lack of housing. Of the six categories used by other member states, Ireland only calculates its homelessness figures based on two categories: those in emergency accommodation and homeless accommodation such as hostels.

By gathering data under each of the categories listed, through examining existing administrative data from various Government Departments and undertaking research, it is possible to generate a more complete understanding of both the current situation in relation to housing need and homelessness. When we have this information, we can then implement policies, legislation and increase investment in social and affordable housing at the scale required to prevent homelessness occurring.

The Housing for All plan gives no reference to this important issue and in SVP's view is a clear policy failure that needs to be addressed as a matter of urgency.

“Our Conference has been trying to support a woman with complex health needs who could not leave hospital for Christmas as she had nowhere to go to. It is very difficult to know how to help in the absence of secure housing for her”

*Social Justice Network Workshop Participant
January 2022*

5.1 Homeless Prevention Measure/Policy Response

The Department of Housing, Local Government and Heritage consider using the ETHOS Light-European Typology of Homelessness and Housing Exclusion.¹²

¹² ETHOS Light European Typology of Homelessness and Housing Exclusion 2017 “A Harmonised Definition of Homelessness for Statistical Purposes” [fea-002-18-update-ethos-light-0032417441788687419154.pdf](https://www.feantsa.org/fea-002-18-update-ethos-light-0032417441788687419154.pdf) (feantsa.org)

6. Conclusion

The availability and supply of secure, affordable and adequate housing is essential in ensuring homelessness can be prevented. However, in of absence of increased social housing currently, the private rented sector is an essential means to help people escape and avoid homelessness. Therefore, we need to make the private rented sector fit for purpose to ensure it can accommodate people who require a home and prevent them entering homeless accommodation.

In that regard, there are improvements that could be made to housing policy and practice. SVP recommends that housing benefits be reviewed so that they more closely reflect market rent, and a complete review of HAP is needed considering the significant role it plays in accommodating people in the private rented sector.

Increase funding is needed as well as a more evenly balanced proportion between homeless prevention and tenancy sustainment measures and the provision of homeless services.

Homelessness is everyone's issue, and it is not inevitable. From SVP's experience much greater collaboration between the Department of Housing and the Department of Social Protection is currently required. Our members continue to support vulnerable households at increased risk of eviction and therefore homelessness, often times the situation is made worse by the lack of acknowledgement and assistance by state institutions such as Local Authorities and Government departments. There needs to a recognition among all stakeholders involved that households may need support with accessing and sustaining a tenancy including assistance with rent arrears in a timely manner.

We also need to understand 'who' and 'how many' people are affected by insecure housing which can lead them having to enter homeless accommodation. We recommend that a broader definition of homelessness is used, as found in other European countries.

We thank the Minister for Housing and the Department of Housing for providing the opportunity to forward our experiences and views in this submission and look forward to continued engagement on behalf of the people we assist.