

## Stakeholder Consultation on “Housing for All” Policy Statement and Action Plan

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# 'Housing for All' Stakeholder Submission

## Question 1

Having regard to the housing objectives set out in the [Programme for Government](#), what other key objectives should be considered? How should these objectives be prioritised?

Under the section 'Homelessness' it is stated that 'reducing and preventing homelessness is a priority for the Government'. At the outset, this is disappointing as the statement lacks ambition and fails to take account of the real trauma behind anybody experiencing homelessness. Housing is a fundamental need, on which so many other needs depend, such as health, safety and privacy. It should be a priority of any Government to 'End Homelessness' rather than 'Reducing It'.

The issue of tenants accumulating rent arrears while living in the private rented sector is not dealt with as a stand alone issue, this fails to recognise that tenants may get into difficulty paying their rent while rents remain high nationally, rent supplement and HAP subsidies are not adequate to cover market rents and the 20% discretionary uplift remains problematic. In 2020, despite the extraordinary and challenging year, rents continued to grow nationwide. This is evident from the Residential Tenancies Board Q4 2020 Rent Index which showed rents grew nationally by 2.7% in Q4 2020. There is an opportunity for the DEASP and Department of Housing to work together to identify households at risk of losing their homes and develop preventative measures, including a joint budget line to address rent arrears and prevent a risk of eviction.

There are no objectives outlined in the document to address improving energy efficiency in the private rented sector. Identifying the exact number of homes in the private rented sector that require upgrades and introducing incentives for landlords to improve their properties would begin to address some of the issues that exist relating to poor living standards. Increasing inspections alone will not assist households living in the private rented sector, it may in some instances put them at increased risk of homelessness.

While the number of people living in the private rented sector and availing of the Housing Assistance Payment (HAP) continues to increase, it would be appropriate to complete a full review of HAP and its interactions with the private rented sector. A report by SVP and Threshold on HAP (report attached), highlighted a number of issues concerning affordability and accessibility, security of tenure, and the cost to the exchequer. It would be important that those issues are fully addressed to make HAP and the private rented sector an important short to medium term solution to the housing and homeless crisis.

## Question 2

What are the main obstacles to delivery of housing across tenures (e.g. social, affordable, private rental and private homeownership) and household types (e.g. single person, people with disabilities etc)

There is a failure in all Government Departments to understand the scale of the housing and homeless problem and as a result to introduce policies, legislation, funding, and new practices that are ambitious to successfully tackle the lack of appropriate housing for people on low and middle incomes and certain household types.

For example, the Government's Rebuilding Ireland programme had set a construction target of 33,500 homes by 2021. These are impressive figures if it were not for the level of housing need that does exist currently; as of June 2019, 68,693 households were on the Summary of Social Housing Assessment. Also, the monthly data homeless reports only count people in local authority managed emergency accommodation. As such, they do not provide a comprehensive picture of the number of people 'who' are currently experiencing homelessness and therefore require secure housing.

Most European member states use the ETHOS Light Classification of homelessness which has six operational categories: people 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.

Lone parent women, in particular, face risks of poverty, for example, - unemployment, low paid, precarious employment and childcare difficulties. They are also more likely to experience hidden homelessness and unable to access services as a result.

In the past, the majority of people experiencing homelessness were single men. Homelessness now also affects women and families of all ages, however, our current legislation concerning homelessness still refers to homelessness being experienced only by single men.

By not having an accurate account of 'who' (both the number and type of households) that are experiencing housing distress, it is difficult to prevent homelessness and housing insecurity occurring in the first place, and the targets for the building of social housing will continue to be insufficient. Policies must be developed in recognition of the need for Government to uphold its obligations under international law when it comes to protecting the rights of the child.

**Question 3** What actions should be taken, in order of priority, to ensure that housing is available for all sectors of society?

- The current housing crisis is, at its core, a crisis in social housing which is having a negative impact on the overall housing market. SVP recommends that 20% of overall housing stock is in permanent social housing over a medium-term timeframe with a stated objective of meeting long-term social housing need through the provision of social housing built and acquired by LAs and AHBs.
- Increase investment in social and affordable housing provision specifically towards groups most likely to live in consistent poverty such as people with disabilities, Travellers (culturally appropriate), one parent family households (predominantly led by women), single person households and long term unemployed.
- The Land Development Agency Bill must ensure that 100% of the homes built on public land should be social and affordable.
- 20% of the Homeless budget should be allocated towards homeless prevention.
- Utilise the ETHOS Light classification system to count the number of people experiencing homelessness including hidden homelessness.
- Ensure that the Housing Assistance Payment and Rent Supplement are aligned to market rents on a national basis as well as roll-out of Homeless HAP currently operational in Dublin.
- Incentivise sales of properties with tenants in-situ.
- Enshrine the right to housing in the constitution.
- Make explicit that low income households can access all Cost Rental Schemes by ensuring access to the differential rent scheme and/or subsidies.
- Amend Section 10 of the Housing Act 1988 to limit the amount of time a family spends in emergency accommodation. The budget allocated to EA should be then redirected to the Housing First programme.
- Restore the value of the Housing Adaptation Grants to pre 2010 levels.
- Ensure sufficient funding is available to allow LA's to complete the energy retrofitting of social housing stock and set a target of upgrading all existing stock in the next four years.
- Set ambitious targets for all LA's under the Repair and Lease Scheme.

#### **Question 4**

Do you have any further comments on the development of the Housing for All policy and action plan that you would like to add?

(1) We now know that the impact of Covid-19 has been felt most severely by those who were already vulnerable; people without secure homes, older people and people with pre-existing health conditions. We also have seen that measures introduced at the beginning of the pandemic to restrict movement and ensure that renters could remain in their homes have been effective in reducing homelessness.

The results of a representative RED C poll carried out in January 2021 on behalf of SVP showed that a proportion of Irish society are facing a multitude of financial pressures due to the pandemic (report attached). These included loss of income, increased household expenditure on basics, erosion of savings to meet ordinary living expenses and falling behind on bills. In relation to those currently renting, a quarter of renters reported falling behind on their bills and 9% were behind on their rent payment.

These are important findings and future policy documents, including Housing For All, must reflect these understandings of what is needed to prevent and address homelessness. Homelessness is everyone's issue and it is not inevitable. All Government departments and Stakeholders must actively work together to address the issues raised from the report outlined above. Also, the new Housing Strategy should have a clear focus on evaluating the plan at agreed timeframes.

Regarding the supports implemented for tenants since March 2020, now is not the time to take away those measures which have allowed tenants stay in their homes. Allowing evictions to take place while the pandemic is still ongoing, numbers remain high and key services such as education are dependent on case numbers being under control is extremely worrying. The moratorium on notice to quit and a ban on rent increases should be reintroduced until January 2022. Also, there should be clear and accessible options for renters that are in rent arrears, including debt relief and an accessible rent arrears fund to address the situation both for landlords and tenants.

(2) SVP have concerns that the Housing for All document sets out an objective of continuing funding for the Mortgage Arrears Resolution Service, Abhaile. While the service is an important mechanism in assisting people in mortgage arrears, issues have been raised about the scheme which have not been fully dealt with. A comprehensive review of the scheme is required to ensure it is fit for purpose.

**SVP Reports highlighted in the Document:**

[HAP Survey Report 2019 by SVP - Issuu](#)

[PowerPoint Presentation \(svp.ie\)](#)

**Additional Information:**

SVP are part of a coalition of housing and homeless organisations that have commissioned research on 'Pillar 1: Address Homelessness' of the Rebuilding Ireland plan; A panel of International researchers will examine the lessons learned and provide analysis on strategies that effectively tackle homelessness from an International perspective.

The study will be available for the Department of Housing and other Stakeholders to assist in the implementation and roll out of the homeless dimensions of 'Housing For All'. The completed study will be finalised in November 2021.