

Discussion of Key Strategic Issues and Identification of Cross-Cutting Issues for the Housing Statement of Strategy

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Table of Contents

Section 1: Introduction

Section 2: SVP Vision: Implications for Housing Strategy

Section 3: Key Considerations with Cross Cutting Implications for Housing Strategy

Section 4: Current Housing Policy Implications for Low-Income Households

4.1 Social Housing

Goal & Action

4.2 The Private Rented Sector

Goal & Action

4.3 Homelessness

Goal & Action

Section 5: Concluding Remarks



Section 1: Introduction

The Society of St Vincent De Paul (SVP) welcomes the invitation to provide our views on the Statement of Strategy 2025. SVP is the largest charity of social concern in Ireland with over 11,000 members in 1200 local Conferences. The Society's mission is to provide friendship and support to those experiencing poverty and social exclusion, to promote self-sufficiency and to work for social justice.

As an organisation working with people impacted by poverty and marginalisation, and visiting people in their homes, SVP are uniquely placed to observe the most pressing matters for people. The current reality for the people we visit is that many households are grappling with precarious living conditions and a constant fear of eviction and homelessness. These struggles are having a profound effect on individuals and families, disrupting their financial stability, impacting negatively on their mental well-being and overall quality of life.

Research by the ESRI in May 2024, of which SVP contributed our experience and insights, clearly highlight the effects of poor quality housing is having on children's social and emotional wellbeing. Low-income households, families with disabilities, some migrant origin families, those living in poor quality housing, and families who have experienced adverse life events are all disproportionately affected. The research findings have implications for the updated housing strategy including the importance of putting increased focus not just on supply, the quality of housing and the communities in which people live are also critical for families' wellbeing.¹

SVP welcomed many aspects of the Housing for All plan, however, there are still policy gaps through which people experiencing marginalisation are falling.² The mission of Housing for All states that "We believe that everybody should have access to good-quality housing to purchase or rent at an affordable price, built to a high standard, and located close to essential services, offering a high quality of life."³ Unfortunately, we know from our members experience working with people all over the Island of Ireland that there are thousands of households experiencing severe stress and worry relating to their living conditions.

¹ ESRI May 2024 Housing, Health and Happiness: How Inadequate Housing Shapes Child and Parental Wellbeing [Housing, Health and Happiness: How Inadequate Housing Shapes Child and Parental Wellbeing | ESRI](#)

² Society of Saint Vincent De Paul (SVP) Combatting Housing Exclusion in Ireland 2021 [Housing paper \(svp.ie\)](#)

³ Government of Ireland Programme for Government Our Shared Future 2020 [gov - Programme for Government: Our Shared Future \(www.gov.ie\)](#)



Therefore, it is welcome that the Minister and Department of Housing are updating the current Statement of Strategy.

The Housing Commission also recognise those concerns, it has stated; “A consequence of these policy failures is that Ireland has, by comparison with our European partners, one of the highest levels of expenditure for housing, yet one of the poorest outcomes.⁴ SVP agrees with the Housing Commission’s following comments that, “the recommendations are intended to achieve a step change in the supply of social and cost-rental housing so that these sectors will be in future be the main source of rented housing for those who cannot afford to rent or buy market housing. This will enable a large reduction in the use of housing allowances for private renting households, such as the HAP, and provide a more secure and affordable housing option for those who need Government support to meet their housing needs.⁵ This would be of immense importance and benefit for the households SVP assist.

The below proposals identified by SVP are grounded in our experience working in, and with communities and households experiencing poverty and deprivation. The current strategy and Government commitments in the Programme for Government do reflect and acknowledge the housing needs of those living in poverty. However, our proposals if acted upon would provide meaningful and lasting change for families and individuals affected by homelessness and housing exclusion.

Section 2:

SVP Vision: Implications for Housing Strategy

SVP Vision: Ensuring everyone has access to secure and affordable homes, within sustainable and resourced communities.
Enact a Poverty Act making Government targets legally binding and place poverty proofing of all Government policy on a statutory basis.
Retain the Child Poverty and Well-Being Office and create a dedicated ringfenced children’s budget (specific budgets asks on tackling child homelessness).
Increase the provision of social housing stock and affordable cost rental homes for low-income households, inclusive of new builds and vacant housing, to represent 20% of total housing stock in line with The Housing Commission’s recommendations.

⁴ Government of Ireland (Gov.ie)(Report of the Housing Commission ‘Housing Commission Report’ [gov - Report of the Housing Commission \(www.gov.ie\)](http://www.gov.ie)

⁵ Government of Ireland Gov.ie Report of the Housing Commission ‘Housing Commission Report’ [gov - Report of the Housing Commission \(www.gov.ie\)](http://www.gov.ie) May 2024 page 154

Introduce a dedicated homeless prevention budget including the provision for a prevention support worker in each Local Authority and a Rent Arrears fund to support private tenancies experiencing financial difficulty and develop legislation to place homeless prevention on a statutory footing.

Establish a Migration Agency in the Department of An Taoiseach dealing with all International Protection matters. As part of this remit, create a taskforce under the responsibility of the Department of Housing, to ensure the needs of refugees and asylum seekers are reflected in the long-term planning housing and services planning.

Section 3:

Key Considerations with Cross-Cutting Implications For Housing Strategy:

- In 2023, over a quarter of a million calls and requests to SVP. Almost 30,000 people reached out to SVP for the first time, many of whom are working in low paid jobs.
- Food and utility bills made up the most requests but many more were in touch because of back-to-school costs, households goods, clothing, furniture, support with additional educational needs, cost of disability, rent, mortgages and funeral expenses.

- 913,000 people going without the basics.
- Over 250,000 children in the State living in enforced deprivation.
- More than 4,000 children without a home.
- 37% of households don't have any money left to save.
- The gap between core social welfare rates and the cost of an MESL stands at €48
- The number of households unable to afford adequate heating doubles between 2021 and 2023.

Source: Cited in SVP's Pre-Budget Submission 2025

[SVP vision for 2030 prompts recommendations for next Government - Society of St. Vincent de Paul](#)

Section 4: Current Housing Policy implications for Low-Income Households

4.1:

Social Housing

Mission: Housing for All: “Over the next five years we will prioritise the increased supply of public, social and affordable homes.”⁶

The Housing for All commitment to providing an additional 90,000 social housing units by 2030 would make a significant contribution to solving the housing and homeless crisis. However, since Housing for All was published in 2021, Ireland and the World has faced significant challenges in the aftermath of the Covid-19 pandemic, construction supply chain shortages, cost-of living challenges, the outbreak of Wars, and an increase in Immigration. As a result, it has been difficult for social housing targets to be met. For example, while 8,100 new builds social homes were delivered in 2023, this outcome fell below the annual 9,100 target as set out in Housing for All.

However, as we continue to face uncertain and unforeseen circumstances, additional planning needs to be implemented into how targets can be met despite ongoing challenges impacting house building and social housing supply. Also, the Housing Commission in laying out its vision for a functioning housing system states that a characteristic of such a system must be “stronger housing data that is regularly maintained and used to inform policy decisions”.

Housing targets that are consistently not being met will be rendered meaningless, therefore there requires a review into how shortfalls can be made up going forward.

Housing for All New Build Targets and Delivery 2020-2023

Year	Target	Output	Shortfall
2020	7736	5070	2666
2021	9500	5196	4304
2022	9000	7433	1567
2023	9100	8110	990

⁶ Government of Ireland Programme for Government Our Shared Future 2020 [gov - Programme for Government: Our Shared Future \(www.gov.ie\)](http://www.gov.ie)

Ireland’s social housing supply is currently at 9% of the housing stock. According to Housing Europe, this is far lower than our European peers such as Austria (24%), France (17%), Sweden (16%), and the Netherlands (29%).⁷ Based on recommendations from the National Economic and Social Council (NESC), reflected in Housing for All, at least a third of new housing should be social housing. To make this aspiration a reality, increased investment is required in every budget to 2030.

	State	Dublin	Cork	Galway	Limerick	Waterford
Social Housing (%)	9.4	13.2	17.7	11.6	9.2	13.2
Rented Privately (%)	18.2	29.7	26.3	35.5	18.0	15.7
Owner Occupied (All) (%)	67.6	49.7	50.3	46.7	67.9	66.8

Source: [WEB-Cluid-Housing-Towards-a-Sustainable-Rental-Sector-in-Ireland-Understanding-the-Key-Challenges-and-Opportunities.pdf](#)

Goal: Improve the supply of social and affordable cost-rental accommodation	Action:
	We welcome the Housing Commission’s recommendation for a targeted increase in the proportion of social and cost-rental housing to 20% of the national stock. The Department of Housing, Local Government and Heritage must urgently reform current procedures to remove barriers to delivering social housing, particularly those relevant to cities. This must include funding approval and procurement procedures. ⁸
	Implement a strategy to address housing target shortfalls going forward.

4.2:

⁷ Housing Europe The State of Housing in Europe 2023 [The State of the Housing in Europe 2023 | Housing Europe](#) (Ireland page 66)

⁸ Government of Ireland (Gov.ie) Report of the Housing Commission ‘Housing Commission Report’ [gov - Report of the Housing Commission \(www.gov.ie\)](#) May 2024 Page 170



The Private Rented Sector

Mission : Housing for All “Over the next five years we will improve the supply and affordability of rental accommodation and the security of tenure for renters”⁹

The Housing Assistance Payment (HAP)

The total number of households in receipt of HAP has declined since 2021. For the first time since the scheme began in 2014, more households left the HAP scheme in 2022 (9,880) than entered (6,590).¹⁰ This highlights a welcome move away from the over-reliance on the private rental market to provide social housing, as 40% of those exiting HAP in 2022 left to go to social housing.¹¹

In the Simon Communities of Ireland report “Locked out of the Market” from March 2024, it shows that only 38 HAP properties were available to rent across 16 areas. There were no properties available within HAP limits in 10 of the 16 areas surveyed.¹²

Whilst HAP is an important support to tenants, it is not suitable for many households as there continues to be issues with HAP limits, security of tenure, availability, and lack of affordability in the private rented sector.¹³ SVP have recommended that a complete review of HAP and its interaction with the private rented sector be undertaken. There are a number of policy and practical implications still to be reviewed and acted upon as outlined in our joint report with Threshold on the Housing Assistance Payment: ‘Housing Assistance Payment: Making the Right Impact’:

SVP and Threshold (2019) “Housing Assistance Payment (HAP): Making the Right Impact” [HAP-Report2019.pdf \(svp.ie\)](#)

Rent Arrears

The latest SILC data show that private renters are at greater risk of poverty, material deprivation and social exclusion, and are more likely to be burdened by debt-especially

⁹ Department of the Taoiseach “Programme for Government :Our Shared Future” 2020 [gov - Programme for Government: Our Shared Future \(www.gov.ie\)](#)

¹⁰ Central Statistics Office (CSO) Social Housing in Ireland 2022 – Analysis of Housing Assistance Payment (HAP) Scheme. [Social Housing in Ireland - Analysis of Housing Assistance Payment \(HAP\) Scheme - CSO - Central Statistics Office](#)

¹¹ Gov.ie Homelessness Data [gov - Homelessness data \(www.gov.ie\)](#)

¹² Simon Communities of Ireland “Locked Out of the Market Executive Summary, March 2024” [Locked Out of the Market Executive Summary, March 2024 - Simon Communities in Ireland](#)

¹³ SVP and Threshold (2019) “Housing Assistance Payment (HAP): Making the Right Impact” [HAP-Report2019.pdf \(svp.ie\)](#)



those who have gone without heat at least once in the year- and are more likely to have utility rent arrears than owner occupiers.¹⁴

There currently is no sufficient protection for renters facing arrears. While those in mortgage arrears or in arrears with their social housing have safety nets and options, if renters do not pay their arrears in full in 28 days from the missed payment, they are facing eviction. SVP know from our work that those facing arrears are not in this position out of choice or negligence. It can be the result of a large, unforeseen bill such as a medical bill, that can decimate a renter’s savings and ability to pay their rent and monthly utilities. Additionally, given the current cost-of-living and lack of affordability in the private rental sector, saving for a rainy day fund is difficult for renters today.

There is a need to put a safety net in place for renters, who are at a greater risk of poverty, material deprivation and social exclusion, and are more likely to be burdened by debt.

Housing Standards in the Private Rented Sector

SVP members are very concerned by the poor standards some tenants are living in in the private rented sector. While it is to be welcomed the significant increase in inspections from only 17,594 in 2021 to 40,282 in 2022,¹⁵ it remains too low considering the significant numbers of households now living in the private rented sector. The target set in Housing for All of 25% of all private rented properties to be inspected needs to be achieved every year at a minimum to afford some protection to low-income tenants living in the private rented sector.

We also need to see clear proposals for the planned maintenance of local authority homes and minimum building energy rating standards for private rented properties set out for tenants living in cold, damp and energy inefficient homes.

<p>Goal: Improve the supply, affordability and security of tenure for renters in the private rented sector</p>	<p>Action:</p>
	<p>Reform the Housing Assistance Payment and the Rental Accommodation Scheme, resetting them as short-to-medium term support measures for household eligible for social housing.</p>
	<p>Set up a dedicated Rent Arrears fund administered at Local Authority level for renters in the private rented sector who get</p>

¹⁴ Survey on Income and Living Conditions (SILC) 2022 – Poverty - <https://www.cso.ie/en/releasesandpublications/ep/psilc/surveyonincomeandlivingconditionssilc2022/poverty>

¹⁵ National Oversight and Audit Commission “Local Authority Performance Indicator Report 2022” September 2023 [20231009-NOAC-PI-Report-2022-FINAL.pdf](https://www.noac.ie/~/media/NOAC/Reports/2023/20231009-NOAC-PI-Report-2022-FINAL.pdf)

	into difficulty paying their rent and face rent arrears and possible eviction.
	Introduce a planned maintenance approach for Local Authority stock management and maintenance.
	Publish a long term retrofit plan for the private rented sector with clear milestones, targets and funding, that incorporates realistic forecasted capacity of the construction sector.

Section 4.3:

Homelessness

Mission Statement: Housing for All “Over the next five years we will tackle homelessness, and Ensure that Rent Supplement and Housing Assistance Payment (HAP) levels are adequate to support vulnerable households, while we increase the supply of housing”¹⁶

Homeless Prevention

Investment in homeless prevention is paramount to preventing an increase in homelessness. There continues to be a lack of understanding or acknowledgement that providing funding and resources to tackling homelessness and preventing homelessness requires the same determination.

In 2022, 82% of all Section 10 funding was spent on emergency accommodation, amounting to approximately €212.2 million, whereas only 6% of available funding was spent on Homeless Prevention, Tenancy Sustainment and Resettlement Supports, approximately €15.6 million.¹⁷ This is unacceptable as we continue to see record numbers of women, men and children experiencing homelessness.

There needs to be homeless prevention measures that are tailored to the specific risks faced by different age cohorts and specific groups experiencing disadvantage and marginalisation, in particular, lone parents. In addition, prevention strategies and associated investment needs to be informed by an adequate empirical evidence base. Ireland continues to fall behind other European countries in the manner it defines and counts the number of people experiencing homelessness. We need to understand more ‘who’ is becoming homeless and ‘why’. It will enable us to prevent it happening in the first place.

In Ireland, the majority of people experiencing homelessness in the past were lone men. Homelessness now also affects women and families of all ages, creating new needs

¹⁶ Government of Ireland Programme for Government Our Shared Future 2020 [gov - Programme for Government: Our Shared Future \(www.gov.ie\)](https://www.gov.ie/en/programme-for-government-our-shared-future/)

¹⁷ Homeless Data, Local Authority Regional Financial Reports (various). <https://www.gov.ie/en/collection/80ea8-homelessness-data/#local-authority-regional-financial-report>



regarding addressing and preventing homelessness. For example, in the June Monthly Homeless Report, over half of families (817), experiencing homelessness in the Dublin region were single parent families.¹⁸ Yet, we do not have any clear strategy to deal with this in the Housing For All plan.

While structural disadvantage, poverty and housing market failure are so often the root causes of homelessness for both men and women, there are ways in which these issues disproportionately impact on women. 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 less likely to engage with services.¹⁹ This is not reflected in current homeless policy regarding who we consider to be homeless.

Therefore, we are not adequately addressing the problem. The monthly data reports published by the Department of Housing Planning and Local Government 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 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. SVP is therefore concerned that the data relating to homeless individuals in Ireland, including families, is inadequate and inaccurate.

The Department of Housing, Local Government and Heritage should consider using the ETHOS Light classification system to count the number of people experiencing homelessness, including hidden homelessness.²⁰

Goal: Eradicate Homelessness	Action:
	The Department of Housing, Local Government and Heritage set a high level objective to end homelessness using the Ethos Light definition of homelessness.
	Significant expansion of both the Tenant-in Situ Scheme and the Cost-Rental Tenant-In Situ in response to the growing number of

¹⁸ Gov.ie Homeless Report -June 2024 Homeless Report -June 2024 [gov - Homeless Report - June 2024 \(www.gov.ie\)](https://www.gov.ie/en/publications-and-statistics/publications/homeless-report-june-2024/)

¹⁹ Trinity College Dublin (2017) “Homelessness among women in Ireland highest in Europe” [Homelessness among women in Ireland highest in Europe - News & Events | Trinity College Dublin \(tcd.ie\)](https://www.tcd.ie/news-events/news/2017/homelessness-among-women-in-ireland-highest-in-europe/)

²⁰ ETHOS Light European Typology of Homelessness and Housing Exclusion [fea-002-18-update-ethos-light-0032417441788687419154.pdf \(feantsa.org\)](https://www.feantsa.org/ethos-light-0032417441788687419154.pdf)



Society of St Vincent de Paul

	Notices of Termination from the private rented sector.
	Reconvene the family homeless prevention sub-group as part of the National Homeless Action Committee to develop a family homeless action plan. This plan must include targeted actions to prevent and address homeless among one parent families. The plan should have additional oversight from the Child and Well-Being Programme Office under its family homeless prevention strand and have a significant focus on early intervention and prevention.
	Commission the Housing Agency to carry out research on entry in and out of homelessness for families. This research should examine causes and pathways into family homelessness using existing data and new data collection streams. The research objectives should have a special focus on preventative measures and leavers for families entering homeless accommodation from the private rented sector and exit pathways for families spending significant lengths of time in emergency accommodation.
	Implement the Housing For All commitment to reform the system of Differential Rents to ensure tenants pay an equivalent amount of rent regardless of their location. These reforms must ensure that family related payments such as the Working Family Payment, Carers Allowance and Domiciliary Care Allowance are excluded from the calculation irrespective of the local authority in which you live
	Reopen Mortgage Interest Supplement to new applicants to prevent families entering into homelessness and exclude mortgage payments from assessment of lone parent social welfare payments
	Provide children experiencing homelessness or at risk of homelessness accesses to a family support worker to support them with the trauma and daily challenges incurred from homelessness.
	Increase HAP rates to the rents advertised for new tenancies in each Local Authority.



Section 5:

Concluding Remarks

Homelessness and housing exclusion can have a devastating impact on those that it touches and makes achieving one's potential very challenging. SVP's insights and recommendations to the updated Housing Strategy both shines a light on the sometimes hidden aspects of the housing and homeless crisis as well as outlining opportunities to address it.

SVP continue to look forward to continuing our working relationship with the Minister for Housing and the Department of Housing in progressing the need for the households we visit access to secure, safe and affordable homes.