

# Consultation on Youth Homelessness Strategy

To: Department of Housing, Local  
Government and Heritage

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**Society of St Vincent de Paul**  
**National Office**  
**91/92 Sean McDermott St.**  
**Dublin 1**



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## Introduction

The Society of St Vincent de Paul (SVP) welcomes the opportunity to make a submission to the Department of Housing on a new Youth Homelessness Strategy. As the largest charity of social concern and action in Ireland, with 11,000 volunteer members carrying out thousands of visits to people's homes every week, we witness the impact of the housing and homelessness crisis on individuals and families 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.

SVP is a member of the Irish Coalition to End Youth Homelessness which was established in September 2017 to consolidate the work of a range of organisations who are trying to tackle youth homelessness.<sup>1</sup> We hope that through the Coalition, we will be better able to draw attention to the issue and highlight our collective solutions. The Irish Coalition to End Youth Homelessness has campaigned for a national strategy on youth homelessness since 2017. The firm commitment to developing a Youth Homelessness Strategy given in the Housing for All programme is a welcome acknowledgement of the urgency of this issue and the unique challenges young people face in finding a safe place to call home.

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<sup>1</sup> The Coalition comprises Barnardos, BelongTo, COPE Galway, Crosscare, EPIC, Foróige, Focus Ireland, National Youth Council of Ireland, Novas, Peter McVerry Trust, Simon Community, SVP, SpunOut.ie, Teen Parents Support Programme, Threshold, and the Union of Students of Ireland. For more information, visit our website: [www.endyouthhomelessness.ie](http://www.endyouthhomelessness.ie)

From our experience in SVP working with people affected by poverty and marginalisation, educational disadvantage, early school leaving, inadequate income supports, unemployment and insecurity and unaffordability in the private rented sector increases young people's risk of homelessness. Of all age groups, young people are most vulnerable. They are least likely to be aware of their rights and of the help and services that are available to them, and are most likely to experience other forms of homelessness recognised under the ETHOS typology, e.g. 'couch surf', staying temporarily with friends and extended family, or live in other precarious situations.

It is for these reasons that SVP, along with our colleagues in the ICEYH welcome the Government commitment to design and implement a Youth Homelessness Strategy. In this submission we outline the key areas of concern and our recommendations for this strategy.

## **Defining and Measuring Youth Homelessness**

In January 2022, the official monthly homeless report from Department of Housing, Local Government and Heritage indicated that 1,111 people aged between 18 and 24 were accessing emergency homeless accommodation.<sup>2</sup> Data from the 2020 Social Housing Summary Assessment shows that there were 5459 households where the main applicant was under the age of 25.<sup>3</sup>

Many of the people SVP members meet are not considered 'homeless' under current housing legislation and homelessness definitions. 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. Understanding and knowing the extent of how many young people experiencing housing insecurity matters to SVP because without this information, homelessness cannot be prevented.

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<sup>2</sup> <https://www.gov.ie/en/collection/80ea8-homelessness-data/>

<sup>3</sup> <https://www.gov.ie/en/publication/970ea-summary-of-social-housing-assessments-2020-key-findings/>

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.<sup>4</sup> 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 appropriate social and affordable housing at the scale required to prevent homelessness occurring for all groups and individuals, including young people.

Currently, youth services and government departments and policies refer to 'youth' with differing understandings of what ages this includes and at what point a young person is no longer eligible for certain state services. This results in young people being forgotten from the specific policies and interventions they require to prevent homelessness occurring for them. The FEANTSA definition states that "Youth homelessness occurs where an individual between the ages of 13 and 26 is experiencing rooflessness or houselessness or is living in insecure or inadequate housing without a parent, family member or other legal guardian."<sup>5</sup> A clear definition of 'youth homelessness' is needed for the purposes of the youth strategy in line with the FEANTSA European Framework for Defining Youth Homelessness.

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<sup>4</sup> 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/feantsa-002-18-update-ethos-light-0032417441788687419154.pdf) (feantsa.org)

<sup>5</sup> FEANTSA 'European Framework for Defining Youth Homelessness' [framework-for-defining-youth-homelessness\\_final\\_pdf3614092469143708469.pdf](https://www.feantsa.org/feantsa-002-18-update-ethos-light-0032417441788687419154.pdf) (feantsa.org)

## Ensuring Income Adequacy

Data from the Survey of Income and Living Conditions shows that young people are at greater risk of severe deprivation than all other age groups. In 2020, 9.2% of people aged 18-24 experienced severe deprivation compared to 6.6% of those aged 25 or older and 7.9% of those under 18.<sup>6</sup> Youth unemployment has fallen since the height of the 2008 crash but remains high, and many young people are in low paid jobs which were disproportionately impacted by the Covid-19 restrictions.<sup>7</sup> The OECD shows that Ireland has one of the highest rates of low paid employment in the world and 38% of National Minimum Wage earners are aged under 25.<sup>8</sup>

As well as a higher propensity to be in low paid work, young people are also subject to lower social welfare entitlement. The imposition of lower rates on young jobseekers is contrary to the provisions of Article 40.1 of the Constitution which states that all citizens should be treated equally.<sup>9</sup> Furthermore, their reduced entitlement puts them at increased risk of homelessness and social exclusion. For example, there are no youth discounts on rent, food, gas, electricity, and other necessities: it costs the same for them to live as other adults.

The decision to cut social welfare for those aged under 26 in 2010 can be primarily seen as cost-saving and austerity measure, rather than a policy measure to increase the education, work and training incentives for young people. Research carried out here in Ireland found that the lower rate of Jobseekers failed to “motivate” young people with low earnings potential to exit the Live Register.<sup>10</sup> The authors point to the

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<sup>6</sup> EUROSTAT - Survey of Income and Living Conditions - Severe material and social deprivation rate by age and sex[jilc\_md11] Last update: 08-03-2022

<sup>7</sup> Byrne, S., Coates, D., Keenan, E. and McIndoe-Calder, T. (2020a) ‘The Initial Impacts of the COVID-19 Pandemic on Ireland’s Labour Market’. Economic Letters, Vol 2020, No. 4, Central Bank of Ireland. <https://publicpolicy.ie/digest/the-initial-labour-market-impact-of-covid-19/>

<sup>8</sup> Callaghan, N. (2018) National Minimum Wage: Social Impact Assessment <https://igees.gov.ie/wp-content/uploads/2018/10/SIA-National-Minimum-Wage.pdf>

<sup>9</sup> Irish Statute Book ‘Constitution of Ireland’ January 2020  
<https://www.irishstatutebook.ie/eli/cons/en/htmla>

<sup>10</sup> Doyle, E. (2018) “Endowment Effect and Reservation Wage: A behavioural evaluation of the impact of 2010 Jobseekers Allowance rate changes on labour market outcomes for young unemployed.”

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<http://www.tara.tcd.ie/bitstream/handle/2262/86018/7%20doyle%20final%20version.pdf?sequence=1&isAllowed=y>

fact that the changes were implemented when employment opportunities were limited, education supports were cut, and employment support services were insufficient. They concluded that the “results provide no evidence for the policy rationale regarding incentivising greater take up of activation or education among young jobseekers”. Research from Germany and Denmark also finds that “from a preventative perspective, the harsher policies aimed at young people equate to a high-risk strategy, which for the most marginal groups may actually increase the risk of social exclusion”.<sup>11</sup>

The 2020 restoration of the full Personal Rate to adults aged 25 was a welcome step towards equalising the treatment of all adults. The extension of the full Jobseeker’s Allowance (JA) rate to adults aged 18 – 24, when living independently and in receipt of a state housing support, was also positive. However, research by the Vincentian Partnership for Social Justice shows that the current Personal Rate (€208) does not adequately meet the cost of an Minimum Essential Standard of Living (MESL) for a single working-age adult with a gap of €51 between social welfare income and the cost of MESL.<sup>12</sup> Furthermore, recent research published by Focus Ireland shows that only 14% of young people exited homelessness into a HAP tenancy or into social housing/AHB accommodation.<sup>13</sup> This shows that independent living with the support of the State is rare for this age group, with 62% of young people departing emergency accommodation for a reason other than moving into secure accommodation.<sup>14</sup>

For adults aged under 24, not living independently the reduced rate of Jobseeker’s Allowance (JA) remained at €112.70 in 2021. According to the VPSJ, this rate of payment meets 75% of urban MESL need, in the context of the adult continuing to

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<sup>11</sup> Benjaminsen & Busch-Geertsema (2009) ‘Labour Market Reforms and Homelessness in Denmark and Germany: Dilemmas and Consequences’. European Journal of Homelessness, p.144  
[https://pure.sfi.dk/ws/files/207207/feantsa\\_ejh2009\\_article\\_5.pdf](https://pure.sfi.dk/ws/files/207207/feantsa_ejh2009_article_5.pdf)

<sup>12</sup> VPSJ (2021) Budget 2022 Impact Briefing [https://www.budgeting.ie/download/pdf/budget\\_2022\\_-\\_mesl\\_impact\\_briefing.pdf](https://www.budgeting.ie/download/pdf/budget_2022_-_mesl_impact_briefing.pdf)

<sup>13</sup> Focus Ireland Insights into Youth Homelessness Series 2020 No.1 ‘Youth Homelessness in the Dublin Region: A Profile of Young, single, emergency accommodation users in 2016,2017,2018’  
<https://www.focusireland.ie/knowledge-hub/research/>

<sup>14</sup> *ibid*

live in the parental family home.<sup>15</sup> An individual in this scenario requires significant financial support from their family to afford an MESL.

With the Pandemic Unemployment Payment winding up, there is an opportunity to reconsider the adequacy of the baseline social welfare rate for young people and its impact on social exclusion. SVP has continually advocated that social welfare rates are benchmarked against the cost of a MESL and that the rates are equalised for those under 24. In 2021, a single adult needs a minimum of €251 per week to live at an acceptable, dignified standard and participate in Irish society.<sup>16</sup>

Ensuring income adequacy for young people must be a core pillar of the forthcoming Youth Homelessness Strategy.

## **Implement a National Housing First for Youth**

Housing First is a solution to homelessness which works based on the concept of providing a person with secure and safe accommodation as the first step to addressing other needs that they may have, such as addiction, poor employment and education status, and mental health issues. Under the Housing First Implementation Plan (2018)<sup>17</sup>, the Housing First programme supports adult-only households with complex support needs, providing housing and intensive support. However, other people who are homeless, including young people and families, who have complex support needs would benefit from the Housing First initiative and should be considered by the Committee and Department of Housing.

An example of a successful Housing First project that could be replicated here to support young people at risk of homelessness is the East Cleveland Youth Housing Trust.<sup>18</sup> The East Cleveland Youth Housing Trust provides housing and training for 16-25 year olds living in rural communities in East Cleveland in England through the

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<sup>15</sup> VPSJ (2022) Budget 2022 Submission [https://www.budgeting.ie/download/pdf/vpsj\\_mesl\\_pre-budget\\_2022\\_submission.pdf](https://www.budgeting.ie/download/pdf/vpsj_mesl_pre-budget_2022_submission.pdf)

<sup>16</sup> MESL 2020 Update report <https://www.budgeting.ie/publications/mesl-2020/>

<sup>17</sup> Department of Housing, Local Government and Heritage 'Housing First National Implementation Plan 2018-2021' [www.gov.ie](http://www.gov.ie) - [Housing First National Implementation Plan 2018-2021 \(www.gov.ie\)](http://www.gov.ie)

<sup>18</sup> East Cleveland Youth Housing Trust End of Year Report 2018 [ECYHT - About - East Cleveland Youth Housing Trust \(ecyhtrust.com\)](http://ecyhtrust.com)



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.

We also echo the calls from the ICEYH that care-leavers should be given priority status on Local Authority Housing Lists. The provision of units to care-leavers should be monitored through Housing Delivery Action Plans reporting, which Local Authorities are mandated to prepare and include an assessment of the the provision of Age Friendly Housing, under Housing for All. Aftercare planning and increased resources for Tulsa aftercare services is also critical in this regard.

Prevention and early intervention measures including housing advisory services made available through schools, community and youth services are critical. System should also be put in place for the early identification of young people at risk of becoming homeless.

## **Ending the Practice of HAP Top-ups**

The gap between Housing Assistance Payment (HAP) and rents in the private rental sector is putting more young people at risk of homelessness. 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.<sup>19</sup> HAP limits have not increased since 2017 and with the widening gap between HAP limits and market rents, young people are severely affected by unaffordable top-ups which put additional pressure on their already inadequate

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<sup>19</sup> 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](https://issuu.com/svp15/docs/hap_survey_report_2019/1?e=25010855/73017298)

incomes. These are all factors that can lead to homelessness and with ever increasing numbers needing to access HAP to find accommodation it is a concern.

## Recommendations

- Introduce a clear definition of 'youth homelessness' for the purposes of the youth strategy in line with the FEANTSA European Framework for Defining Youth Homelessness.
- Implement the ETHOS Light-European Typology of Homelessness and Housing Exclusion.
- Incorporate the key actions of the forthcoming Youth Homelessness Strategy into the new National Strategy for Children and Youth People to ensure a comprehensive cross-departmental approach and a focus on early intervention and prevention.
- Restore and equalise the social welfare rate for young people under 24 and benchmark social welfare rates against the cost of a Minimum Essential Standard of Living. Set a target of reaching an adequate level for all primary payments by 2026.
- Extend Housing First practice and principles to young people who are homeless or at risk of becoming homeless.
- Integrate advice and supports services for young people at risk of homelessness into school, community, and youth settings.
- 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.
- Conduct complete review of HAP and its interaction with the private rented sector to ensure it can support households find and sustain accommodation.