



Society of St. Vincent de Paul

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**SUBMISSION TO THE DHPLG NATIONAL  
HOMELESS CONSULTATIVE FORUM FAMILIES  
SUB-GROUP**

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**JANUARY 2020  
SVP Social Justice and Policy Team**

## **Contents**

<b>1. Introduction and Background</b>	<b>Page 2</b>
<b>2. Homeless Prevention</b>	<b>Page 3</b>
<b>3. Supports for families in Emergency Accommodation</b>	<b>Page 6</b>
<b>4. Removal of Blockage</b>	<b>Page 8</b>
<b>5. Conclusion and Recommendations</b>	<b>Page 9</b>

## 1.Introduction and Background

SVP's submissions to the National Homeless Consultative Forum Families Sub-Group, is based on the experience of our 11,000 members across the country. SVP have a unique insight into the current reality of people experiencing homelessness, 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, manages ten homeless hostels, 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.

In 2018, 4,251 new social housing homes were built. <sup>1</sup>Whilst this was a significant increase on new builds in 2017, it is insufficient considering there are 10, 448 homeless including 1,685 families.<sup>2</sup> In addition, there are 68, 693 households qualified for social housing support.<sup>3</sup> SVP advocates that to address the homeless crisis Local Authorities must increase the building of social homes and introduce a national affordable cost rental model on scale for families on low incomes.

For the purposes of this paper, we have concentrated on additional policy measures that require attention to coincide with the increased building of more social and affordable housing.

## 2. Homeless Prevention

### 2.1 Homeless Prevention

The share of renter households has increased from around a fifth to just under a third between 2003 and 2017.<sup>4</sup> SVP members have witnessed this increase in the last number of years in their home visitation work, traditionally members would have conducted the majority of their visitations to tenants of local authority housing, now, visitation expands to private rented housing in much greater numbers than was previously the case.

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[https://www.housing.gov.ie/sites/default/files/publications/files/construction\\_status\\_report\\_q3\\_2019\\_final\\_2.pdf](https://www.housing.gov.ie/sites/default/files/publications/files/construction_status_report_q3_2019_final_2.pdf)

<sup>2</sup> <https://www.focusireland.ie/press/focus-ireland-welcomes-slight-drop-in-homelessness-figures-but-says-government-must-do-a-lot-more-in-2020->

<sup>3</sup> [https://www.housing.gov.ie/sites/default/files/publications/files/sha\\_summary\\_2019\\_dec\\_2019\\_web\\_1.pdf](https://www.housing.gov.ie/sites/default/files/publications/files/sha_summary_2019_dec_2019_web_1.pdf)

<sup>4</sup> <https://www.centralbank.ie/docs/default-source/publications/household-credit-market-report/household-credit-market-report-2019.pdf?sfvrsn=6>

Most households which exit homelessness find their new home in the private rented sector, usually with the support of the Housing Assistance Payment (HAP). In addition, the homeless problem manifests itself in the private rented sector- with 75% of homeless families renting their last stable home from a private landlord.<sup>5</sup>

The national average rent rose 18% between Q2 2016, when the caps were set, and Q4 2018.<sup>6</sup> A joint report by SVP and Threshold, The Housing Assistance Payment (HAP): making the right impact?<sup>7</sup> found that for a family with three children, HAP rent caps ranged between about 60-75% of actual market rents. Even allowing for the 20% uplift on rent caps that can be applied on a case by case basis, the rent caps means that most tenancies in the private rented sector are simply out of reach of those who need them. While homeless HAP can provide a further uplift, this is again discretionary and not operational across the whole country.

### **Policy Response:**

For HAP to remain an effective measure to support households into the private rented sector, it is critical that HAP rent caps bear a realistic relationship to actual market rents. A complete review of HAP and its interaction with the PRS is required to determine the next steps for HAP, given the changing landscape of housing and renting in Ireland.

## **2.2 Homeless Prevention**

Local Authority expenditure on homeless prevention and tenancy sustainment was €10 million in 2018. Budget 2020 allocated €166 million to emergency accommodation and homeless prevention. In 2018, the total expenditure to these two budget lines was just under €157 million. In real terms, therefore, the increase amounts to less than 6 per cent, whereas the increase in the number of homeless people accessing emergency accommodation between October 2017 (when Budget 2018 was delivered) and September 2019 was almost 21per cent.<sup>8</sup>

### **Policy Response**

- Increase funding for primary and secondary homeless services. Increased funding should be evenly distributed between homeless prevention and the provision of homeless services.

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<sup>5</sup> <https://www.focusireland.ie/wp-content/uploads/2019/06/Focus-Ireland-Submission-to-Committee-on-Housing-June-19.pdf>

<sup>6</sup> Based on analysis of Q4 2018 RTB Rent Index

<sup>7</sup> [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)

<sup>8</sup> <https://www.socialjustice.ie/sites/default/files/attach/publication/6081/2019-11-27-chapter5-thechallengesofsuccess.pdf?cs=true>

### 2.3 Homeless Prevention

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.

Crucially, SVP 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 homelessness:

- Suspension of Rent Supplement payment to landlord due to failure to provide all of the necessary documentation within a short timeframe.
- Suspension of Housing Assistance Payment to landlord when a household falls into arrears on the differential rent paid to the Local Authority.
- Refusal of Rent Supplement when Housing Assistance Payment has been suspended.
- Refusal of 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.
- 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.
- 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 cases is that members were working with vulnerable and marginalised households. Language barriers and a distrust of state services and agencies compounded the issue further. SVP understands that the issue of the HAP payment being ceased due to arrears has not to date affected a significant number of people<sup>9</sup>, however, every measure that can prevent homelessness should be exhausted on a human and cost-effective level.

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<sup>9</sup> <https://www.oireachtas.ie/en/debates/question/2019-03-28/211/?highlight%5B0%5D=payments&highlight%5B1%5D=arrears&highlight%5B2%5D=arrears&highlight%5B3%5D=payment&highlight%5B4%5D=housing&highlight%5B5%5D=arrears&highlight%5B6%5D=arrears>

### **Policy Response**

- Ensure that the Department of Housing, Planning and Local Government and the Department of Employment Affairs and Social Protection work together to identify households at risk of losing their rented accommodation. 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. Supports to families in Emergency Accommodation Accommodation Provision**

It is widely acknowledged that the root causes of homelessness are due to the shortage of social and affordable homes, however, measures can be put in place to mitigate and reduce the effects of homelessness on families and children. This is not happening on the level or extent that it should be currently. The provision of accommodation should be linked with the provision of care and support services. This is currently not happening across all emergency homeless services impacting on the physical and mental health of people in these situations. It should not be beyond our capacity to do this considering we are heading into our sixth year of a homeless crisis.

### **3.1 Hotels & B&B's**

Lone parent families with children now make up the biggest cohort in the homeless population. Homelessness impacts every facet of a child's life from conception to young adulthood. A US study by the Boston Medical Centre has shown the devastating effects of homelessness on children's health: children who have been homeless for at least 6 months are more likely to experience recurring hospitalisation, be underweight or suffer developmental delays.<sup>10</sup>

Limited cooking and storage opportunities results in poor-diet and resulting malnutrition for both children and parents. Parents are left with little option but to over-rely on take-away meals and cheap convenience foods.<sup>11</sup> The other issue SVP members have raised which is resulting in social isolation and poor mental wellbeing is the lack of appropriate meeting space where parents can converse with other adults. It is often the case that SVP members are the only other adults a parent may get to speak with frequently while living in emergency accommodation. Clients also highlighted the issue of hotel rules not allowing parents leave their children unattended while also having the

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<sup>10</sup> <https://pediatrics.aappublications.org/content/142/4/e20174254>

<sup>11</sup> <https://www.focusireland.ie/wp-content/uploads/2014/08/Share-and-Hennessy-2017-Food-Access-Report—Main-Report-FINAL.pdf>

need to speak with a member. This is particularly problematic for parents who are parenting alone. We should not underestimate the importance of having a space to meet and converse. The lack of opportunities to live life in a normal fashion illustrated above further compounds the feelings of stigma and shame associated with homelessness.

### **Policy Response**

End the practice of using hotels and B&B accommodation as a source of emergency accommodation as soon as possible. In the interim consider the proposal from Travelodge Interagency Group to facilitate the use of accommodation located beside the hotel for the use by families for eating, washing and study space. Consider this proposal for other hotel accommodation being used by homeless families.

### **3.2 Self-Accommodation**

Over 400 families are currently 'self-accommodating in Dublin.<sup>12</sup>

### **Policy Response**

End the practice of self-accommodation by requiring local authorities to source and secure emergency accommodation for people experiencing homelessness.

### **3.3 Family Hubs**

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.

Both the Irish Human Rights and Equality Commission<sup>13</sup> and the Ombudsman for Children have called for time limits on how long a family should spend in hubs. In the OCO's recent report, No Place Like Home<sup>14</sup>, children and young people share their experiences of living in family hubs in their own words. It is clear that children themselves do not consider family hubs to be the solution to the homeless crisis. The report also highlights the negative effects of emergency accommodation on parenting, individual and family privacy, children's ability to rest, sleep, play and study.

### **Policy Response**

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<sup>12</sup> <https://www.focusireland.ie/wp-content/uploads/2019/09/Budget-2020-Policy-Document.pdf>

<sup>13</sup> <https://www.ihrec.ie/app/uploads/2017/07/The-provision-of-emergency-accommodation-to-families-experiencing-homelessness.pdf>

<sup>14</sup> <https://www.oco.ie/app/uploads/2019/04/No-Place-Like-Home.pdf>

The National Quality Standards Framework, (NQSF), for homeless services is a welcome development but consideration should be given to expanding the remit of the Health Information and Quality Authority, (HIQA), to allow it conduct independent statutory inspections and monitoring of all homeless services.

#### 4. Removal of Blockages

*'We will go through this crisis and somewhere along the line there will be enough houses, but we will not have changed the system. Therefore, when the next crash comes, children and families will still not be protected'*.<sup>15</sup> This statement from the Ombudsman for children adequately describes the concerns SVP have for the current and future realities of homelessness in Ireland.

##### 4.1.

We need to understand more *'who'* is becoming homeless and *'why'*. It will enable us to prevent it happening in the first place. For that to happen, current policies and legislation require urgent attention.

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 regarding addressing and preventing homelessness. 66% of homeless Irish families are headed by lone parents, the vast majority are women.<sup>16</sup> 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.<sup>17</sup> Lone parent women, in particular, face risks of poverty, for example, - unemployment, low paid, precarious employment and childcare difficulties.<sup>18</sup> They are also more likely to experience hidden homelessness and less likely to engage with services.<sup>19</sup> 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

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<sup>15</sup>

[https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint\\_committee\\_on\\_housing\\_planning\\_and\\_local\\_government/reports/2019/2019-11-14\\_report-on-family-and-child-homelessness\\_en.pdf](https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint_committee_on_housing_planning_and_local_government/reports/2019/2019-11-14_report-on-family-and-child-homelessness_en.pdf)

<sup>16</sup> [https://www.tcd.ie/news\\_events/articles/homelessness-among-women-in-ireland-highest-in-europe/7995/](https://www.tcd.ie/news_events/articles/homelessness-among-women-in-ireland-highest-in-europe/7995/)

<sup>17</sup> Edgar B. and Doherty J (2001) Women and Homelessness in Europe. Brussels: FEANTSA

<sup>18</sup> [https://issuu.com/svp15/docs/working\\_\\_parenting\\_and\\_struggling-\\_1?e=25010855/71456122](https://issuu.com/svp15/docs/working__parenting_and_struggling-_1?e=25010855/71456122)

<sup>19</sup> [https://www.tcd.ie/news\\_events/articles/homelessness-among-women-in-ireland-highest-in-europe/7995/](https://www.tcd.ie/news_events/articles/homelessness-among-women-in-ireland-highest-in-europe/7995/)



comprehensive picture of the number of people who are homeless. Most European member states<sup>20</sup> 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.

### **Policy Response**

The Department of Housing Planning and Local Government should consider using the ETHOS Light classification system to count the number of people experiencing homelessness.

## **5. Conclusion and Recommendations**

The availability and supply of secure, affordable and adequate housing is essential in ensuring and ending homelessness. SVP recognise the task facing the Department of Housing, Planning and Local Government and Local Authorities is significant.

We acknowledge that there is an increasing amount of families leaving homelessness and indeed being prevented from becoming homeless in the first instance.<sup>21</sup> The Department should consider evaluating current policies and practices that have being implemented and are working to achieve these figures and replicate throughout all Local Authorities.

In light of the shortage of social housing, the private rented sector is an essential means to help people escape and avoid homelessness. However, for many the financial barriers and instability of tenancies are too great. SVP recommends that housing benefits be reviewed so that they more closely reflect market rents and a complete review of HAP is needed considering the significant role it plays in accommodating people in the private rented sector.

Homelessness is everyone's issue and it is not inevitable. SVP recommends that all government departments contribute to ending homelessness and a cross-Governmental strategy is needed. From

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<sup>20</sup> According to the annual ARA (Housing Finance and Development Centre of Finland) study of 15 November 2017, 415 homeless people were counted rough sleeping or in emergency accommodation (ETHOS 1.1 and 2.1), 244 in hotels (ETHOS 3.1), 428 in medical institutions (ETHOS 6.2) and 5,528 provisionally accommodated with family or friends (ETHOS 8.1).

<sup>21</sup>

[https://www.housing.gov.ie/sites/default/files/publications/files/summary\\_of\\_homelessness\\_financial\\_and\\_performance\\_reports\\_for\\_q3\\_2019\\_1.pdf](https://www.housing.gov.ie/sites/default/files/publications/files/summary_of_homelessness_financial_and_performance_reports_for_q3_2019_1.pdf)

SVP's experience much greater collaboration between the Department of Housing and the Department of Social Protection is currently required.