

FOCUS **Ireland**

Pre-Budget Submission 2018

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Introduction

In June this year there were 7,941 men, women and children experiencing homelessness in Section 10 funded emergency accommodation, an increase of a quarter (1,583) in just one year and the highest ever recorded in the history of the State.

This figure does not capture all those who are considered homeless under the ETHOS definition, which has been accepted by the Government for over a decade¹: in particular, it does not include individuals and families in domestic abuse shelters, or asylum seekers whose application has been accepted but are trapped in Direct Provision centers. Beyond that, it does not include those families who are forced to 'double up' with family or friends for prolonged periods, nor young people who have left the care system and are sleeping on couches, nor those in psychiatric or general hospitals who have no home to be discharged to.

These additional groups need to be considered not to inflate the 'official' figure – which ought to be sufficiently shocking – but to highlight the extent to which what we call the 'homelessness crisis' is just one expression of much deeper problems in our housing, social services and welfare systems.

Family homelessness, which has increased by almost 300% in just three years, is one particularly destructive aspect of this crisis. The number of families becoming homeless in the Dublin region has risen from an average of 20 families a month in 2013 to 75 families a month to date in 2017².

While these figures make for grim reading, the homelessness crisis has not been ignored. Homelessness is a political priority for both the government and opposition parties in the Dáil, as well as for the public.

Many of the responses of local authorities, in particular the Dublin local authorities, have been impressive in mobilizing and providing emergency accommodation to the rapidly increasing numbers of families experiencing homelessness. That is not to say that the response have been faultless, there have been cracks in the system that Focus Ireland and others have highlighted, but we must acknowledge the good work that has been undertaken.

However this work has largely been concentrated on *managing* the crisis. It is now time to reassert the objective of *ending* homelessness, and bringing an end to human and social damage that it does. This will require all stakeholders to redouble our efforts to maintain a persistence of effective policy, which has to date been lacking. Of course it cannot be achieved immediately but this must not stop us setting out a clear pathway, with ambitious but realistic milestones, towards a future in which homelessness is rare and quickly resolved.

By no means all the policies required to meet that challenge have immediate budgetary implications, but many do. This submission concentrates on those which have immediate budgetary implications and it should be seen in the broader context of Focus Ireland's submission to the review of Rebuilding Ireland.

¹ A Way Home: A strategy to address adult homelessness 2008 –2013, Department of Environment, Heritage and Local Government (2008)

² 450 newly homeless families recorded from January to June 2017 in Dublin (Focus Ireland data)

Budget Decisions Make a Difference

While homelessness has continued to grow, policies introduced under Rebuilding Ireland have had some impact. The two graphs below illustrate this. Table 1 shows the number of families becoming homeless each month in the Dublin region. Table 2 shows the month on month increase.

Table 1: Number of families becoming homeless each month in the Dublin Region

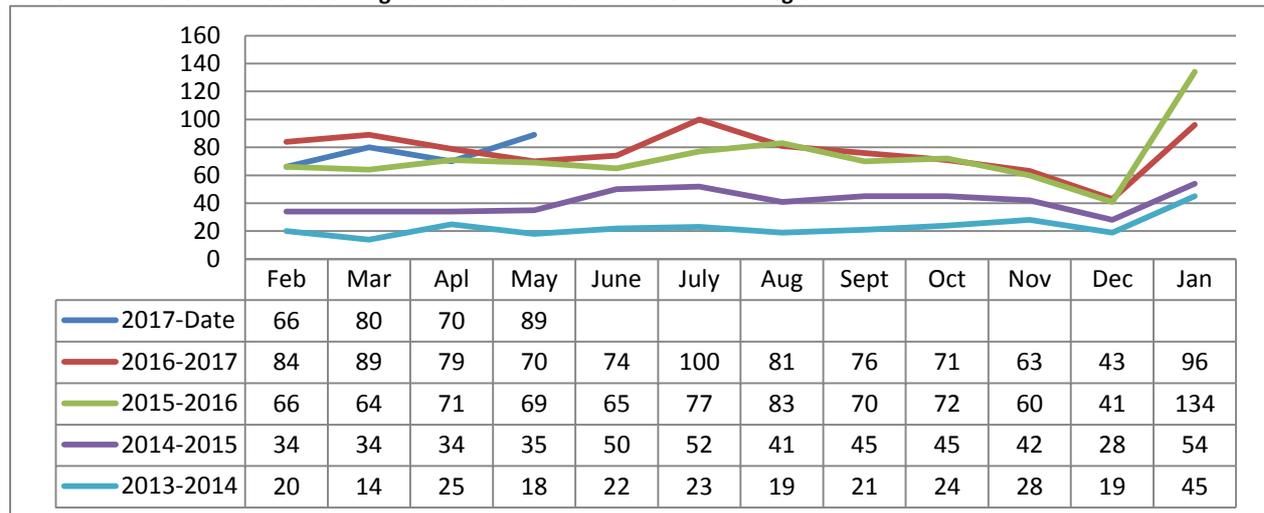


Table 2: Change in real numbers of the number of families homeless in the Dublin region each month

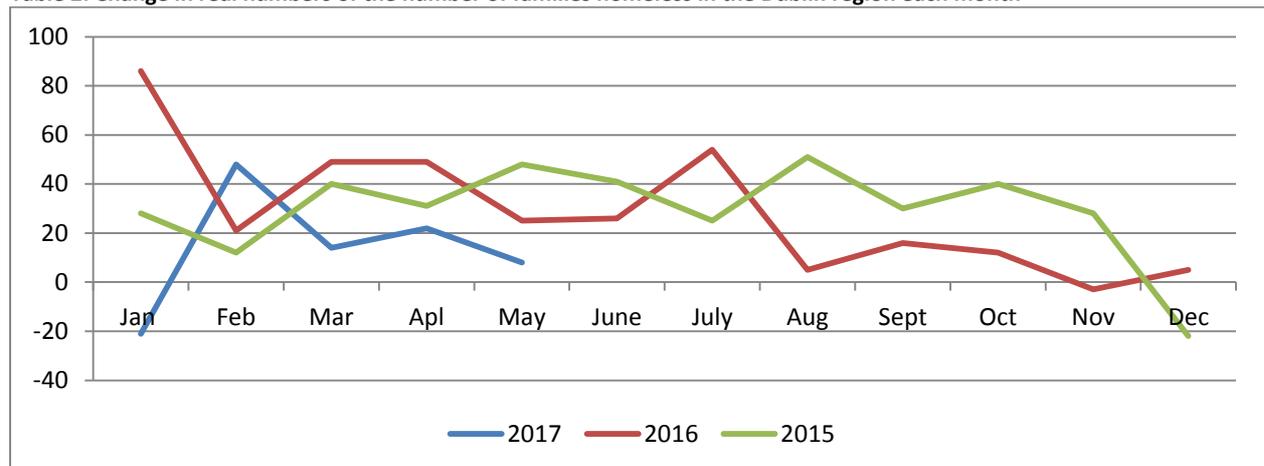


Table 1 shows us that the number of families becoming homeless has remained stubbornly high. However, Table 2 shows us that the *rate of growth* in family homelessness has been slowed from the middle of 2016 suggesting that families experiencing homelessness are being supported to move-on. In particular July 2016 seems to mark a turning point - and this coincides with two significant policy changes - the increase in the rates of rent supplement and the Housing Assistance Payment³. This highlights the way in which Government budget decisions can impact on number of households that become homeless or move-on from it.

³ Focus Ireland Family Insights No.6 www.bit.ly/FIslowdown

Many individuals and families that experience homelessness also face a range of other complex problems. Focus Ireland has documented this in a number of published 'Insights' into Family Homelessness⁴. While this is an important dimension - directing us towards the importance of tenancy and other supports – it can also obscure the potential immediate impact of budgetary decisions on our housing system. Good decisions can begin to have a positive impact over short periods.

But the effects of positive budgetary changes do not last forever. The increase in family homelessness in recent months suggests that the positive impact of the July 2016 Rent Supplement has run its course, and needs to be repeated again this year to prevent the progress we have made being eroded.

Budget 2018 will be an important marker as to whether the current minority Government is content to mitigate the impacts of mass homelessness or has the resolve to end it. This submission set out a series of effective measures with budgetary implications across the range of Government departments which have a role in tackling the causes and effects of homelessness.

⁴ <https://www.focusireland.ie/research/>

Department of Housing, Planning and Local Government

Housing Policy

Increased capital budget for social housing provision

Many of the problems with our disastrous housing system have their roots in influence that financial institutions have exercised over housing markets from the 1980s⁵, when reduced public investment saw the decline in the size of our public housing stock. Today public housing stock accounts for only about 10% of all housing. Many commentators feel that this should be increased significantly, even doubled⁶. There are a number of mechanisms which could be used to achieve this, including a significant investment in direct-build public housing or leveraging the capacity of Approved Housing Bodies (AHB) to deliver affordable rental accommodation.

Rebuilding Ireland has a number of targets for the provision of housing and in particular social housing, however the target for 'newly built' social housing amounts to only about 15% of the target of 134,000 'new social housing solutions'. Furthermore it was never clear in the strategy what proportion of these units would be built by private developers (Part V) and how many by the local authorities/AHBs. In the event, the amount of new build social housing has been scandalously inadequate – with only 40 being completed in Dublin in 2016. While a larger number of new build social houses are now 'in the pipe-line' the numbers, particularly in the main population centres, remain totally inadequate to the scale of the crisis. The problem is even more severe when the number of social housing units being taken out of use for long-term redevelopment is taken into account.

Focus Ireland welcomes the review of Rebuilding Ireland announced by the new Taoiseach⁷. We particularly welcome the focus on whether there is a need for 'a greater quantum of social housing build'. However, before we set new targets we must give some consideration to why the existing targets set out in Rebuilding Ireland have not been met.

The core problem is that, during a period of extreme market failure in the housing sector, social housing strategy has relied on market activity to deliver social housing. To some extent this issue has become embroiled in ideological debates. However, given the scale of the problem and the fact that the private sector is only in the early stages of recovery, there is an overriding case for a much accelerated role for statutory authorities in constructing housing to address this market failure.

Even though there have been repeated Ministerial announcements of capital being provided for new social housing, much of the promised €5.35 billion only becomes available towards the end of the 6 year strategy. In practice, those local authorities which have prepared ambitious delivery programmes find a number of delays and limitations, many of them related to access to funding.

⁵ Norris, M (2016) Property, Family and the Irish Welfare State. Basingstoke: Palgrave Macmillan

⁶ <https://www.irishtimes.com/opinion/opinion-ireland-needs-a-clear-national-housing-plan-1.2590168>

⁷ <http://oireachtasdebates.oireachtas.ie/debates%20authoring/debateswebpack.nsf/takes/dail2017061400030?opendocument>

Focus Ireland supports the views set out by the Housing Finance Agency (HFA) in its submission to the Oireachtas Committee on Housing and Homeless⁸. The HFA argued for a more ambitious and clearly defined role for local authorities in building social housing and that the HFA should become the primary source of funding for local authority building. Over a year has passed since this submission was made, and given the failure to deliver adequate levels of social housing through other means, it remains as relevant today.

We believe that Government needs to use the current consensus about the importance of building housing to make a number of forthcoming choices much clearer to the electorate.

One of these issues relates to the question of how investment in housing impacts on the level of recorded national debt. While successive Governments have insisted that the 'money is there' for local authorities and AHB's to invest in housing, the current mechanisms available make this a complex, cumbersome and slow process. To a large extent, this complexity is due to the Government policy of ensuring all such investment is 'off the Government books'. The dominance of this policy objective is contributing to the very slow start in the construction of public housing.

Focus Ireland fully recognizes that this proposal for HFA lending to deliver local authority-build social housing would have implications for the level of general government debt and choices about tax. We are conscious of the fiscal rules and the constraints that are on the government and how these must be managed by the Departments of Finance and Public Expenditure and Reform. However we also have also noted comments made before Oireachtas Committees by Frans Timmermans⁹, First Vice President of the European Commission, and Andrew McDowell¹⁰, vice president of the European Investment Bank where they evidenced areas where there was flexibility in the area of housing. Mr. Timmermans noted that the Growth and Stability pack constraints had 'popped up in a number of member states' and acknowledged that the issue of housing needed to be reviewed in that context and Mr. McDowell stated that "there is widespread recognition across Europe that there needs to be more investment in infrastructure in particular." The State must accept that affordable housing constitutes fundamental infrastructure and the current rate of provision amounts to an infrastructural deficit.

This is essentially a political decision about priorities, and Budget 2018 represents a key moment in how we set those priorities.

Recommendation: The Government should sanction a €1.3 billion borrowing capacity for the Housing Finance Agency to be loaned to Local Authorities in order to deliver 13,500 newly built homes over the period of Rebuilding Ireland.

Development of affordable rental models

Ireland is severely lacking in affordable rental options¹¹. Households reliant on income supports are forced to compete in the private rented sector, and are burdened with unsustainable rent levels as a result. Current housing options in Ireland are deeply polarised. Strict means-testing results in many

⁸<http://oireachtasdebates.oireachtas.ie/Debates%20Authoring/DebatesWebPack.nsf/committeetakes/CHH2016052400002?opendocument#KKK00100>

⁹<http://oireachtasdebates.oireachtas.ie/debates%20authoring/debateswebpack.nsf/committeetakes/FDJ2017022100002#A00300>

¹⁰<http://oireachtasdebates.oireachtas.ie/Debates%20Authoring/DebatesWebPack.nsf/committeetakes/CBO2017062900002?opendocument>

¹¹ Focus Ireland (2007) Rental Systems in Ireland The Case for Change, Editors: Simon Brooke and Dáithí Downey www.bit.ly/FIcostrental

low income households are stuck in the middle - shouldering significant rents, but unable to access the owner-occupier market. These 'intermediate households' may struggle to maintain their tenancies and are at risk of increased poverty and homelessness. The State needs to take a more forceful role in the provision of affordable housing; the private market cannot and will not deliver all the housing the Irish people need.

Rebuilding Ireland commits to the introduction of an affordable rental programme. The scheme was due to be finalised by Q3 2016 and has budgetary backing of €10 million. 'Key workers' in urban centres are due to be targeted first. Following the introduction of Rent Pressure Zones in 2017, the affordable rental model is now focused on 'kick-starting supply' in these zones.¹² Local authorities have been tasked with developing the models for these sites. However, the recent Rebuilding Ireland update announced a shift in government policy from cash subsidies to affordable rental to subsidies through provision of state land. This shift meant that the road forward for affordable rental is now through the most congested, slow and frustrating intersection in housing policy – the use of publicly owned land.

Approved Housing Bodies are well-placed to provide affordable rental accommodation alongside their traditional role of providing social housing. In jurisdictions with successful cost or affordable rental models, such housing is often provided by large-scale, professional organisations. A number of the larger AHB's could have the capacity to fulfil this role in Ireland. Many are keen to do so, but require an effective and settled policy framework and appropriate financial support in the early stages. Neither of these has been forthcoming despite years of deliberation and verbal support, and the recent shift in policy from cash subsidy to land subsidy needlessly closed off this avenue as a significant supply route for additional housing in the near future.

As set out above, there does seem to be an opportunity to secure at least part funding for initiatives that address infrastructural deficits from EU institutions. This opportunity should be grasped with a particular focus on the building of long-term affordable rental properties.

The government should also consider the Nevin Economic Research Institute (NERI) recommendations for the establishment of a commercial, publicly-owned company operating on a cost-recovery model which would then undertake or commission the development of new cost-rental homes.¹³ This company could supplement the work of Approved Housing Bodies, with additional funding being secured from commercial lenders. Rental income could then be used to repay loans.

Recommendation: Budget 2018 should commit to cash funding of an affordable rental scheme, and should ring-fence a portion of this funding to subsidise AHB development.

Specialist Youth Housing

We know that experiencing homelessness at a young age can have serious impacts on an individual's life course. While the causes of homelessness are complex, access to housing is a key issue for many young people. A housing market which focuses competition on the private rented sector will negatively impact young people on lower incomes or lower social welfare payments. Young people require different housing options.

¹² Written Answer, 25 May 2017: <https://www.kildarestreet.com/wrans/?id=2017-05-25a.13&s=%22affordable+rental%22#g14.g>

¹³ NERI Working Paper Series, *Ireland's Housing Emergency – time for a game changer*, 2017, available at: https://www.neriinstitute.net/download/pdf/irelands_housing_emergency_time_for_a_game_changer.pdf

Rebuilding Ireland has been rightly criticised for its lack of action or acknowledgment of youth homelessness but we must acknowledge that the commitment to young care-leavers under action point 1.7, is a significant one. The Rebuilding Ireland commitment of Capital Assistance Scheme (CAS) funding to provide homes for vulnerable young people leaving care is welcome and has the potential to have a long-term impact. However the real potential will only be realised if investment in youth housing is sufficient and sustained.

While the level of commitment will need to run well beyond this government we are calling on this government to ensure that the €66 million of CAS allocation to TUSLA in 2017 is maintained in each of the remaining years of the Rebuilding Ireland plan.¹⁴

Allocation of mainstream social housing in Ireland gives priority to the length of time a person has been 'on the housing list' and the number of dependents they have. Both these criteria militate against young adults, making it extremely difficult for even very vulnerable young people to access social housing tenancies. Focus Ireland believes that there is a very strong case to establish an Approved Housing Body specialising in providing homes for young people, including those at risk of homelessness.

There are a number of successful models in other jurisdictions, which provide a mixture of social and cost rental housing for a wide social range of young people. This reduces stigma and allows young people with higher support needs to live in mixed tenure communities with people of their own age. The Finnish Youth Housing Association, whose staff recently visited Ireland, is a particularly successful model, providing housing to young people aged between 18 and 29. A percentage of their housing stock is reserved for young people with higher support needs or who have experienced homelessness. However, all young people can access 'housing counselling' to support them to maintain their tenancies. This approach means that young people are living in mixed tenure communities, albeit with people their own age.

Recommendation: The State should commit to the sustained funding of the 'CAS for care-leavers' programme, at least until the expiration of the Rebuilding Ireland action plan.

Recommendation: Budget 2018 should signal support for the establishment of a specialist Youth Housing AHB, with appropriate flexibility in the existing housing finances programmes.

Prevention of Homelessness

Funding for services that prevent homelessness

Focus Ireland continues to advocate strongly for an increased commitment to policies and services that prevent homelessness.

Even as organisations and State agencies successfully support households to move on from emergency accommodation, the number of individuals and households experiencing homelessness continues to increase - the number of newly homeless families presenting to services each month remains high: 78 such families presented in June 2017.¹⁵

While the State has invested in some welcome preventative measures, including advertisement campaigns and a freephone service, operated by Threshold, Focus Ireland believes more targeted

¹⁴ <https://www.kildarestreet.com/wrans/?id=2017-05-09a.509&s=capital+assistance+scheme#g511.r>

¹⁵ Focus Ireland, Latest Figures on Homelessness in Ireland: <https://www.focusireland.ie/resource-hub/latest-figures-homelessness-ireland/>

prevention measures would enhance effectiveness. Our organisation recently piloted a prevention programme in Dublin 15¹⁶.

In this programme, Focus Ireland worked with the local Department of Social Protection to write to families in receipt of rent supplement who were potentially at risk of homelessness. Over 165 families at risk of homelessness contacted us, 75% of whom had never contacted State prevention services before. Households were referred to clinics run by trained prevention workers. The pilot successfully supported 90% of at-risk families that contacted us to maintain their tenancies or find alternative accommodation. The pilot was fully funded by corporate partners.

This report highlighted the benefits of:

- Better access to Housing Advice and Information services
- More effectively targeted campaigns which utilise our collective knowledge and contact information about households that might be at risk of homelessness

Government funding for homeless services has increased substantially over the last number of years. However, a very large proportion of this money goes to pay for emergency responses, increasingly in the private, for-profit sector. €39 million was spent by the State on emergency accommodation alone in 2016.¹⁷ Organisations struggle to provide accessible, quality prevention services with the trained staff necessary to actually make a difference.

Recommendation: The Department of Housing should ring-fence a proportion of Section 10 funding for prevention services, in particular advice and information services, targeted prevention campaigns and staff training.

Monitoring Rent Pressure Zones and Equality Legislation

There have been a number of recent legislative changes designed to protect tenants in the private rented sector. In particular, these include Rent Pressure Zones, changes to the Residential Tenancies Act 2004 and the Equal Status Acts 2000 to 2015. However, there is no policing of these new measures, and there are fears that many landlords will ignore their requirements under the law.

Rent pressure zones were introduced in December 2016 with Dublin and Cork city immediately designated as such. A number of additional zones were designated in January and March 2017, as they met the criteria laid out in the Planning and Development (Housing) and Residential Tenancies Act 2016.

The Residential Tenancy Board recently released their Q1 2017 Rent Index.¹⁸ This analysis involves the rent which new tenants pay for their property, rather than the asking price and is therefore a more reliable figure than Daft reports. The results from the Q1 rent index indicate that rents continue to trend upwards. Nationally, rents increased at a rate of 7.37% annually. However, rents in Dublin declined by 1.5% this quarter. This was the result of a fall in rents for Dublin apartments. Private rents for houses continue to rise but at a rate of 0.1%.

¹⁶ www.bit.ly/D15report

¹⁷ Source: Dublin Region Homeless Executive

¹⁸ Available at: <http://www.rtb.ie/docs/default-source/default-document-library/rtb-rent-index-2017-q1-%283%29.pdf?sfvrsn=2>

The Director of the RTB has stated that the findings from Q1 suggest that the rate of increase in private rents is moderating, though she also confirms that the market is still unstable and that it is too early to accurately determine if the moderation is a trend.¹⁹

In the Q1 2017 Daft report, which is based on asking prices, the organisation undertook a survey of some 4,000 renters. The report highlights important differences in rent paid by those in a tenancy and rent paid in order to secure a new tenancy. The report also highlights that tenancies in the private rental market are now held for a period of 3 years or more.

This combination of factors would suggest that if these properties are the mainstay of the properties that come onto the market in the coming months asking rents could fall as the 4% rule applicable to RPZ's will link asking rent to a rent lower than the previous quarter.

There are concerns that the moderation intended by RPZ designation will not occur due to the total lack of investment in the monitoring and policing of the rent predictability measures. At present there does not seem to be any likely consequence for any landlord who ignores that RPZ regulations at the time of a re-let. No explanation has been offered for the failure to put in place any form of enforcement system for these important measures, so it is assumed that the reasons related to cost. Given the cost to the state of homelessness arising from rising rents, the failure to invest in an enforcement system for RPZs is a false economy.

The Equal Status Act was amended by the Equality (Miscellaneous Provisions) Act 2015. It is now an offence to discriminate against someone on the basis that they are in receipt of rent supplement, HAP, or any other social welfare payment. While there have been a few successful cases brought to the Workplace Relations Commission on this provision, these entirely depend upon the actions of individual citizens and, according to the reports of Focus Ireland customers, have had no impact on the attitudes of many landlords.

Similarly, while new measures were introduced to increase the protection of tenants when their landlord issues a Notice of Termination because of sale of the property or future use of the property by family, no system has been put in place to enforce these. Even where households present to Local Authorities as homeless, giving the landlords decision to sell as the reason for their homelessness, there is no system in place to check that due process has been followed.

Recommendation: The Residential Tenancies Board should be adequately funded to establish a system to support the detection and enforcement of Rent Pressure Zones and new legislative measures.

End the practice of self-accommodation for homeless families

Where a family presents to the Dublin local authorities and is assessed as homeless under the legislation, it has become the practice in many cases for the family to be asked to find their own emergency accommodation, which will then be paid for by the local authority. This practice is known as 'self-accommodation'.

We estimate that around 250 families are currently made responsible for finding their own emergency accommodation each night in Dublin. While most of these families are capable of doing so, many families are under so much stress that they are unable to do so.

¹⁹ Latest data from RTB quarterly rent index, available at: <https://www.rtb.ie/media-research/news-centre/latest-news/2017/06/15/latest-data-from-rtb-quarterly-rent-index>

Given the scarcity of such accommodation, it is not unusual for families to be unable to source accommodation themselves. Families and Focus Ireland staff spend an enormous amount of time each day contacting commercial hotels in an attempt to source accommodation. Even after a hotel is sourced, the process for securing the LA funding is complex.

This practice represents an attempt to transfer the responsibility for securing accommodation from the statutory authorities to the family in crisis. It is justified as a cost containing measure by the local authorities, but in fact involves a transfer of the cost to other statutory and voluntary organisations and to vulnerable citizens at their most vulnerable moments.

Due to the scarcity of hotel accommodation during busy times, this practice results, from time to time, in some families which have been assessed as homeless under the legislation not being provided with any emergency accommodation for the night, and having to sleep rough or make other potentially risky arrangements.

The Government's existing commitment to end the use of commercial hotels except in exceptional circumstances should be linked to a new commitment to end the practice of 'self accommodation' in all circumstances.

Recommendation: The Department of Housing should issue a Circular instructing local authorities that, where they assess a family as being homeless under the legislation, they have an obligation to secure emergency accommodation for them. Funding to provide this support should be ring-fenced in the Section 10 funding provided.

Housing First

Housing First is recognised as the most effective approach to ending chronic homelessness and rough-sleeping, and Ireland has established itself as one of the European leaders in delivering this programme at a substantial scale. The partnership of Focus Ireland and Peter McVerry Trust has completed the target set under its contract of delivering 100 Housing First tenancies in Dublin by October 2017, and is now working to deliver the new Rebuilding Ireland target of 300 tenancies. The primary challenge to delivering this the availability of housing units, but continued and reliable funding from both the DoH and the HSE is essential to ensure the success of this programme

Recommendation: Funding for the continued delivery of the Dublin Housing First 300 programme should be provided in the 2018 budget, and provision should be made for other Housing First programmes in other cities where appropriate.

Department of Children and Youth Affairs

The Department of Children and Youth Affairs has a number of specific but crucial engagements with the problem of homelessness: in relation to the support needs of children in families that are experiencing homelessness, minors who are 'out of home' and young care leavers who are at risk of homelessness. Many of the services related to these issues are delivered by Tusla. As homelessness is not seen as a core responsibility for either the Department or Tusla, and there are very many compelling demands upon resources, it is important to ring-fence and sustain the resources needed for the crucial contribution made to tackling homelessness.

Supports for care-leavers at risk of homelessness

Ensure that Aftercare support is effective

Over the course of the last number of years there has been steady legislative progress on the issue of aftercare and the provision of supports to prevent young people leaving the care system from experiencing homelessness. However, there remain certain groups of vulnerable care leavers who continue to face a very high risk of experiencing homelessness.

While there has been welcome, albeit slow, progress in the commencement of the Child Care amendment act 2015, there still remains major problems in availability of resources to meet the aftercare support needs of young people. One of the ways Tusla has sought to square the circle of working to meet the legislative commitment while living within budgetary constraints is to increase the number of young people which an aftercare worker is expected to support as part of their allocated caseload. Historically Focus Ireland aftercare services operate at a caseload of 15-20 but have recently been required to increase this to 22-25. In some aftercare services caseloads of over 30 are not uncommon. At this level of caseload the needs of a young person with complex needs cannot meaningfully be met, rendering the goal of 'allocating an aftercare worker to every careleaver who needs one' to little more than a tick-box exercise.

Focus Ireland's experience, backed by internationally recognised good-practice, indicates that the optimum caseload in respect of young people with support needs is between 15-20. Young people should be able to expect consistency of support regardless of the aftercare provider.

Recommendation: Budget 2018 should provide sufficient funding to Tusla to provide an aftercare worker for all care leavers who need one at a caseload of 1:20 in 2018, working progressively towards a reduction to 1:18 by 2020.

Employment supports for care-leavers

While there have been significant improvements in the level and consistency of financial support to young care-leavers continuing in education, there is no evidence of any consideration of the supports needed by young people seeking to enter the labour market. In effect the provision of support to this cohort of young people is passed on to INTREO/Department of Social Protection who have no specialised skills or programmes to meet the needs of care leavers. Youth unemployment was 12.9% in April 2017 and competition for employment remains high meaning that many care leavers who do not continue with education remain unemployed at a crucial and formative point in their lives.

Focus Ireland believes that additional supports are required for many of those young people who are leaving care and for whom entering the labour market is the best available option at that time. Focus Ireland operates Employment Focus for Youth, a recruitment agency which supports young people leaving care who are experiencing or at risk of homelessness. Experienced recruitment staff support young people with every aspect of the job search process, and maintain relationships with employers who provide them provide employment opportunities.

Young people leaving care who are seeking to enter the labour market should be supported to develop an 'Employment Plan' with their aftercare worker. This plan should outline any costs which might arise in the pursuit of employment (e.g. Travel to interview, suitable dress, and training). Tusla should then provide additional funding to cover these costs, as is the case for care leavers in education.

Recommendation: As part of the support provided to young people leaving care, financial support should be made available to support a job finding strategy for those seeking employment.

Supports for children at risk of homelessness

Child support worker allocation

Family homelessness reaches a new peak each month, and the number of children residing in emergency accommodation continues to climb – now 2,894²⁰. The main response of the government for the moment is to provide 'hub' emergency accommodation. Rebuilding Ireland includes a number of provisions to ensure appropriate support for the children of families that remain homeless.

Since the beginning of the crisis, the HSE has funded three specialist child support workers to provide support for children in homeless families that are assessed as needing that support, and Tusla gave welcome support for two additional workers in 2016. However, the number of families that are homeless and the length of time during which they remain homeless continues to grow. Focus Ireland estimates that the current level of children homeless with their families would require approximately 14 caseworkers to assist children that need support.

Focus Ireland funded research into the impact of family homelessness has indicated both the benefits of the child support for homeless families, and that children who need such support are being denied it.²¹

Recommendation: The Department of Children and Youth should allocate €540,000 (in a full year) to TUSLA to ensure that sufficient child support workers are available early in 2018.

Investment in domestic violence services

There is considerable evidence that domestic violence continues to be the cause of family homelessness in a significant number of cases. Domestic violence was cited as a contributory or causal factor in each of the regular surveys that Focus Ireland has carried out into the causes of homelessness, though its extent has varied considerably.²²

²⁰ <https://www.focusireland.ie/resource-hub/latest-figures-homelessness-ireland/>

²¹ Harvey, B and Walshe, K (2017 forthcoming)

²² Available at: <https://www.focusireland.ie/research/>

Given the current housing crisis and the lack of affordable housing for individuals fleeing violence, reports that domestic violence refuges are being forced to turn away hundreds of women and children are highly worrying. Rebuilding Ireland commits to providing additional emergency refuge spaces to protect those forced to leave their homes because of the threat of domestic violence. This commitment was due to be delivered in “2016/2017”²³. However, Minister Zappone recently confirmed that five additional family accommodation units will be available in the Dublin area in “early 2018”²⁴. It is unclear how many families will be accommodation in these five units.

Existing domestic violence services, which are now within the remit of TUSLA, have seen a 17% cut in funding since 2012. These vital services must be fully funded in order to protect those experiencing domestic violence, particularly those who lack safe accommodation as a result.

Recommendation: Progress on the commitment in relation to homelessness arising from Domestic Violence in Rebuilding Ireland must be funded and expedited. In addition, statutory funding for domestic violence services should be returned to pre-2012 levels.

Recommendation: Tusla should be required to provide a timely monthly report of the number of adults and children provided with emergency accommodation in Domestic Violence services, in a format compatible to the figures provided by the Department of Housing.

Family mediation to prevent homelessness

The major study into youth homelessness in Ireland, ‘Young People, Homelessness and Housing Exclusion’²⁵, found that family conflict or arguments with carers were key factors in young people leaving home and becoming homeless. Where family breakdown is not the result of abuse or neglect, it is possible to resolve underlying issues and so support reconciliation. The research recommended that a family mediation service should be established to help prevent homelessness in such cases.

Focus Ireland launched its pilot Family Mediation service in June 2016, fully funding by private donations but with Tusla support in governance and referrals. The service has successfully supported young people to return to the family home and to improve their relationships with family and carers. The service receives referrals from the TUSLA Crisis Intervention Service and works with young people who are in emergency accommodation or who are at serious risk of homelessness. The service is currently staffed by a single mediator. This necessarily limits the number of young people that the service can work with, and the complexity of cases which the service can accept. A waiting list of referrals has already built up.

The value and effectiveness of this intervention is already evident and Focus Ireland is seeking for Department of Children and Youth Affairs to provide funding for a second mediator to work alongside the existing privately funded mediator, to increase the number of families/children that can be supported, and so stem the flow of young people into homelessness.

Recommendation: The Department of Children and Youth Affairs should provide €63,000 to fund a second family mediator and consider further investment in the development of this service intervention.

²³ Rebuilding Ireland, page 88

²⁴ <https://www.kildarestreet.com/debates/?id=2017-07-04a.367&s=refuge+rebuilding+ireland#g370.r>

²⁵ Mayock, Parker, Murphy ‘Young People, Homelessness and Housing Exclusion’ (2014)

Department of Education and Skills

Educational supports for children in families that are homeless

A period of family homelessness is profoundly disruptive to the education of children in the family. Problems range from practical issues such as the distance of travel and lack of space to do homework to psychological impacts such as stigma and depression. International evidence suggests that homelessness can significantly increase the risk of poor educational outcomes. Family homelessness is an extreme form of deprivation which creates a grave risk of translating into educational disadvantage.

The primary policy instrument used by the Department of Education and Skills to tackle educational disadvantage is the DEIS system. However, it is estimated that 45% of children in emergency accommodation are attending non-DEIS-designated schools.²⁶ Levels of housing instability and homelessness are not used to assess whether a school should be designated as in need of additional support. The DEIS scheme was reviewed in early 2017 and again, despite the massive growth of family homelessness, it received no substantive mention. As a result, half of the children who are homeless are excluded from accessing DEIS supports like breakfast and after-school clubs and free school meals. They do not benefit from the help of HSCL or school completion officers.

It is essential that the Department of Education recognise that the family homelessness crisis is an educational crisis too, and responding to it cannot be left to other Departments.

The Department of Education must urgently develop a range of policies, training programmes and other supports for schools and teachers struggling with the challenge of a large number of children in families that are homeless.

Recommendation: The 2018 budgetary allocation to the Department of Education should include funding to provide educational supports, separate to DEIS, to schools with a high-level of pupils who are homeless. The Department should also be resourced to ensure teachers are trained to understand the difficulties faced by families and children experiencing homelessness.

²⁶ See Focus Ireland Insights into Family Homelessness: <https://www.focusireland.ie/wp-content/uploads/2016/04/Insights-into-Family-Homelessness-No-3-2016-Children-experiencing-Homelessness-and-DEIS-Schools.pdf>

Department of Social Protection

Income supports to people in private rented housing

Rent Supplement rates

As shown above (Table 2) ensuring that rent subsidies are available and reflect real market conditions is essential in addressing homelessness. The increase in Rent Supplement in July 2016 followed a long period during which Rent Supplement levels were held at levels well below real market rents. This policy was part of the austerity programme and informed by an ideological view of the private rented market. The inadequate level of rent supplement combined with the uncertainty created played a significant part in creating the high level of family homelessness we face today.

We need to learn from the positive impact of the July 2016 increase, and ensure that Rent Supplement levels are revised in a regular, predictable and transparent manner.

The Rent Pressure Zones cover most areas where rent inflation is leading to increased homelessness. In these areas, maximum rent increases were set at 4%, although, as discussed above, real rents are likely to rise faster than this

Recommendation: Rent supplement should be reviewed annually and benchmarked against market rent. Rent Supplement levels should be increased by at least 4% in Rent Pressure Zones areas.

Income disregards for rent supplement and transfer to Housing Assistance Payment (HAP)

When a household is in receipt of rent supplement there is a disregard for the first €75 of earned incomes. In circumstances where a household transfers to the HAP all earned income is taken account of when calculating the differential rent. This can mean a loss of income for some households transferring from rent supplement to HAP of up to €11.25.

In some instances the extra flexibility that the HAP payment offers may outweigh the additional cost but some Department of Social Protection Rent Supplement offices are insisting that recipients transfer to HAP despite this loss of income.

However given the focus on activation that the Department of Social Protection is pursuing these disincentive to move to a housing supplement that provide greater flexibility to increase working hours without putting accommodation at risk it seem counterproductive not to bridge this income loss.

Recommendation: The Department of Social Protection should work with the Department of Housing Community Planning and Local Government to ensure that all households that transfer from rent supplement to HAP are able to recoup any lost income.

Review policy impact of reduced rate for young jobseekers

The series of reductions in social welfare payments for young people introduced since 2009, result in a saving of more than €150 million a year for the Department of Social Protection²⁷. Despite the scale of this policy change, the Department of Social Protection has carried out no research into whether it achieves its intended policy goal (increasing labour market participation among young people) or has any unintended negative consequences.

Since 2009, Focus Ireland has been drawing the attention of the Department and Ministers for Social Protection to the experience of homeless organisations that this policy is resulting in a number of young people becoming trapped in homelessness. We have regularly received assurances that this issue would be addressed, yet no action whatsoever has been taken²⁸. It is certain that this policy has had catastrophic and totally avoidable impacts on the lives of many young people.

It is now time for the government to address this unnecessary, unacceptable and damaging gap in our social protection system by ensuring that where a young person on a reduced rate is homeless they can access full rate social protection to support their exit from homelessness (and progression into training or employment).

Focus Ireland advocates strongly for evidence-based policy decisions. Given the above increase in youth homelessness, we also believe it is timely to review the impact that a significantly reduced rate of social welfare has on young people more generally. Research conducted on similar welfare policies in Germany and Denmark notes that “from a preventative perspective, the harsher policies aimed at the young equate to a high-risk strategy, which for the most marginal groups may actually increase the risk of social exclusion”²⁹. As noted above, State policies must now turn to prevention as the only meaningful way to end the crisis of homelessness. Considering the impact of our current policies is an important aspect of this.

Recommendation: Focus Ireland calls for an exemption from the reduced rate of social protection for young people leaving homelessness.

Recommendation: The Department of Social Protection should commission an independent review of the impact of reduced rate social protection on young people.

Review situation of lone parents experiencing homelessness

One parent families have been disproportionately impacted by the homelessness crisis. Some 65% of the families that are experiencing homelessness are one parent families, while they make up only 25% of families with children³⁰ in Ireland. The vast majority of these lone parent families are headed by women.

This disproportionate impact has been largely ignored in policy responses to family homelessness. It is time for the State to comprehensively review the situation of lone parents experiencing homelessness, to understand the factors contributing to their prevalence in homeless services and to develop policies to mitigate against this. Consideration should be given as to whether additional supports are needed to alleviate risk.

²⁷ Dail Eireann, Debates, 25th November 2015, 200-201.

²⁸ <https://www.kildarestreet.com/wrans/?id=2013-04-24a.112&s=focus+Ireland#g114.r>

²⁹ Benjaminsen & Busch-Geertsema, “Labour Market Reforms and Homelessness in Denmark and Germany: Dilemmas and Consequences” (2009) European Journal of Homelessness p144

³⁰ http://www.cso.ie/en/media/csoie/releasespublications/documents/population/2017/Chapter_4_Households_and_families.pdf

Recommendation: The Department of Social Protection should comprehensively investigate the prevalence of lone parents in homeless figures.

Basic Rate of Social Protection

Poverty is one of the key contributing causes to homelessness. Through the services we provide, Focus Ireland sees the reality of households trying to make ends meet on a basic social welfare payment. We have welcomed this Government's 2017 increases in the basic rate of social protection but this work must continue to see social protection payment levels returned to pre-crisis level, for all groups.

Recommendation: Focus Ireland call for a schedule of increase to be put in place to increase basic social protection rates to the pre-crisis level of €204.30.

Voluntary Sector Pensions

Charitable and voluntary sector organisations make an enormous contribution to the well-being of citizens by providing services on behalf of the state and innovating new services for people who have fallen through the state safety net. In many cases, voluntary sector organisations are funded to deliver front-line services which would otherwise be the responsibility of State departments. However, Government departments and agencies operate very different policies in relation to providing funding for staff salaries in the organisations that they enter in contracts with. In some cases, the full cost of salaries and pensions is provided, while other departments and agencies explicitly exclude the funding of employer pension contributions from their contracts. As it is very difficult for charities to fundraise to cover the cost of pension schemes, the under-provision of pensions for thousands of voluntary sector workers appears to be a direct consequence of Government policy.

Recommendation: As part of ongoing reviews into the pensions system, the Department should instigate a review of the policies of Departments and Agencies in funding non-government organisations providing services on behalf of the State, with a view to a cross-Government policy on making an appropriate contributing towards the pensions of State-funded voluntary sector employees.

Department of Health

Budget for Homeless Services

While funding of homeless service through Department of Housing Section 10 funding was largely frozen during the period of austerity budgets, funding from the Department of Health/HSE experienced massive cuts, in some cases of over 40%.

This reduction in HSE funding placed a significant strain on the range of social care, mental health and physical health services which are essential in supporting people who are experiencing homelessness and supporting them to make and exit. These cuts happened in parallel with a massive increase in the numbers of people who were homeless and an increase in the support needs of many groups.

In recent years, the HSE homeless budget has been increased marginally. This is very much welcomed, resulting in increases in dedicated mental health services in some areas. However, the scale of the funding gap is still enormous.

Recommendation: The HSE funding line for homeless related services, within HSE Social Inclusion, should be increased by 5% in 2018 as a further step in redressing the cutback in services experienced during the austerity period.

Investment in mental health services recruitment

The underfunding of general mental health services has been widely documented. Focus Ireland is particularly concerned about the lack of access to mental health supports for those experiencing and at risk of homelessness. The HSE have repeatedly noted difficulties in the recruitment of qualified staff. Significant numbers of beds have had to be closed in recent weeks because of nursing shortages.³¹ At the end of 2016, there were a total of 1,483 vacant posts across the mental health services.³² Significant staffing requirements are needed to deliver on the commitments in *A Vision for Change*.

The recent report released by the Committee on the Future of Healthcare recommended significant increases to the mental health budget in order to ensure adequate staffing is achieved across the sector.

Recommendation: The Department of Finance should provide budgetary allocations sufficient to meet the recommendations outlined in Sláintecare³³. This includes an additional €45.7m for child and adolescent mental health teams and €44.5m for adult community mental health teams.

Young people experiencing homelessness face particular challenges in accessing mental health services. The impact of this on young people was re-emphasised in the independent evaluation of

³¹ <http://www.irishtimes.com/news/health/half-beds-at-children-s-mental-health-unit-to-close-due-to-nurse-shortage-1.3092525>

³² From Mental Health Reform, available at: <https://www.mentalhealthreform.ie/uncategorised/recruitment-crisis-mental-health-services-demands-action/>

³³ <http://www.oireachtas.ie/parliament/media/committees/futureofhealthcare/Oireachtas-Committee-on-the-Future-of-Healthcare-Slaintecare-Report-300517.pdf>

the Focus Ireland youth housing service in Limerick, which found evidence of unmet mental health support needs among the young participants.³⁴ For measures to reduce youth homelessness to be fully effective a properly resourced, youth-focused mental health resource needs to be available to relevant programmes.

Recommendation: The HSE Social Inclusion ring-fence some of the increased allocation for mental health for the provision of mental health nurses and mental health support workers to youth homelessness programmes.

³⁴ Just Economics, *Limerick Youth Housing Evaluation*, 2017, available at: bit.ly/FIYouthHousing

Department of Justice and Equality

Financial support for AHBs to become compliant with GDPR

The new General Data Protection Regulation due to come into force in May 2018 will have a huge impact all homeless charities and Approved Housing Bodies as we hold a substantial amount of personal data pertaining to tenants and customers. The GDPR introduces onerous new documentation and subject access processes, and also requires organisations to appoint a Data Protection Officer who should have specific expertise and training and should report to senior management and the Board.

The changes and requirements wrought by the GDPR are resource and time heavy. Based on informal statements from the Office of the Data Protection Commissioner, it seems likely that charities will be required to employ a Data Protection Officer. This will constitute a significant strain on finances which is in no way reflected in the state funding of homeless charities or AHB's.

Government Departments fund AHB's and other housing and homelessness organisations to provide services that would otherwise be the purview of the State. Protecting the privacy of customers accessing such services should be a priority of AHB's and their funders. However, the state needs to recognise the additional burden being placed on homeless charities and AHBs to become compliant with the GDPR and provide a funding stream to support the work involved in regulatory compliance.

Recommendation: The State should establish a designated fund to aid statutorily supported homeless charities and Approved Housing Bodies with regulatory data compliance and the employment of GDPR-mandated Data Protection Officers.