

Pre-Budget Submission 2019

Making Budget 2019 a “Budget for homelessness”

28 September 2018

Table of Contents

Introduction	3
Department of Housing, Planning and Local Government	6
Housing Supply	6
Increase the capital budget for social housing provision	6
Provide capital support to deliver a substantial level of Affordable Rental units	8
Enhanced Leasing Scheme	9
Preventing Homelessness	9
Dedicated funds for targeted measures to prevent homelessness	9
Provide Resources to Enforce Rent Pressure Zones and rental legislation	11
Supporting Emergency Homeless Services	12
Provide funding for a Case manager for every homeless family	12
Increase HAP levels and extend Homeless HAP to all RPZs	13
Supporting Exits from Homelessness	13
Resource delivery of Housing First nationwide	13
Housing for Vulnerable Young People	14
Department of Children and Youth Affairs	15
Youth homelessness	15
Expand Family mediation services to prevent youth homelessness	15
Increase the effectiveness of Aftercare for vulnerable young people	16
Supporting young people to earn a living	16
Family homelessness	17
Reduce the risk of domestic violence resulting in homelessness for the victims	17
Ensure every child who is homeless and needs special support receives it	18
Department of Education and Skills	19
Resource effective educational supports for children in families that are homeless	19
Department of Employment Affairs and Social Protection	20
Reduce poverty through adequate social protection for people of working age	20
Provide normal 'adult' levels of welfare for young people at risk of homelessness	20
Reduce the risk of homelessness by increasing Rent Supplement to reflect market rents	21
Review state policies which underfunding of pensions for care staff in the voluntary sector	21
Department of Health	26
Health related Homeless Services	26
Investment in mental health services recruitment	26

Introduction

The annual budgetary process is increasingly played out as public theatre rather than serious consideration of the challenges and choices facing the country.

In this light it might be easy to dismiss calls for the 2019 budget to be a 'budget for homelessness'. The main budgetary expenditure is already set and most of the headline 'announcements' of billions of expenditure on housing will in fact be re-announcements of commitments long-made.

In Rebuilding Ireland, the Government is committed to a five-year programme which it believes is delivering and simply needs more time to prove it. It is also committed to a capital expenditure programme which commits €450m to capital housing expenditure in 2019, and sets out spending plans until 2021¹.

Figure 1: Capital Plan Commitments to Housing 2016-2021

	2016	2017	2018	2019	2020	2021	Total
Allocations [1]	500	570	580	450	400	400	2,900

[1] This is predominantly Exchequer funded. It also includes €77 million per annum of Local Authorities through own-resources.

Source: Department of Public Expenditure and Reform

However, the 2019 budget will be of enormous consequence for the 10,000 people who are officially homeless, and also for the hundreds of thousands caught up in the wider housing crisis of spiralling rents, evictions, and overcrowding. Not only must the Department of Housing secure the significant additional funding to sustain over-stretched emergency services, but they must secure real additional funding for its capital programme.

Next year is a critical year for Rebuilding Ireland. The plan sets 2019 as the peak year for the provision of social housing, with over 25,000 social housing solutions to be provided (including subsidies to private rental through HAP). These building targets for 2019 (with targets now increased by 800 units per year above the graph below) will be by far the biggest challenge for the strategy to date.

But it is essential that the Government look beyond next year's budget and prepare for the challenges to come.

¹ Building on Recovery: Infrastructure and Capital Investment 2016-2021 pp 32

There is little that the 2019 budget can do to influence the delivery of new built social housing in 2019. Unless the modular housing programme get a substantial – and welcome – new lease of life, where site works are not already started on budget day, it is meaningless to announce – or propose – higher output targets for 2019.

What is at stake is the delivery of housing in 2020 and beyond.

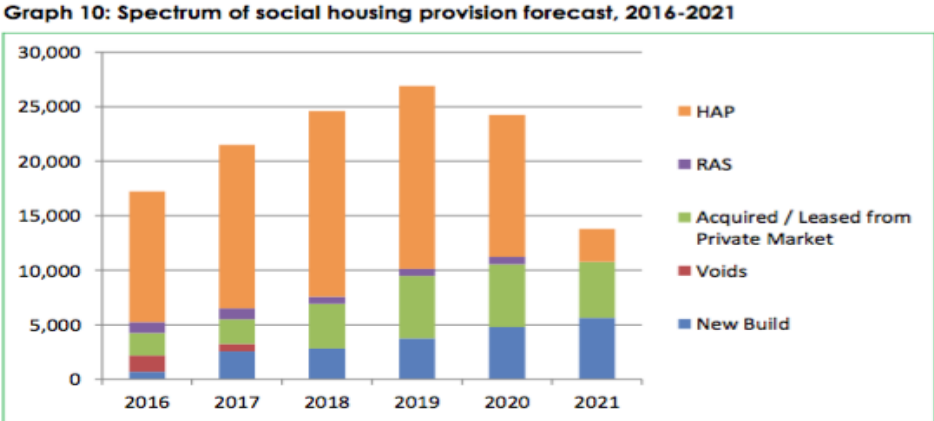
Experience over the last two years indicates that Rebuilding Ireland is overly dependent upon bringing private housing into social use. The costs and limitations of the Housing Assistance Programme (HAP) have received recent attention, but RBI’s planned year-on-year reliance on property acquired or leased from the private market is also increasingly questionable.

Add to those challenges the fact that Rebuilding Ireland shows total social housing delivery actually decreasing for the final two years of the plan, from 2019. It is abundantly clear that the predictions of need which were behind that strategy need to be revised – and the funding allocations behind them revised too.

The only policy instrument which Government can actually be certain of to close this gap is to significantly increase the building social housing by local authorities and Approved Housing Bodies (AHBs). Because of the time-lags in planning and building social housing, the 2020 budget will be too late to make that shift; it must be made in the 2019 announcements.

Focus Ireland does not underestimate the scale of this challenge. Such increased investment would have macro-economic consequences and would constrain tax choices. The original decision to backload much of the social housing build into the later years of the plan, means that it is even more challenging to increase those targets now.

Figure 2: Breakdown of projected social housing delivery 2016-2021



*This new social housing stock includes units and tenancies delivered through the HAP and RAS schemes on an annual basis. It should be noted that HAP is a demand-led scheme and it is envisaged that the transfer of those on rent supplement to HAP will be complete by 2020.

Figure 1: Source: Rebuilding Ireland

There are budgetary challenges for other Departments too. In order to adequately respond to the needs of 3,000 children who are homeless, Tusla needs additional resources. It also needs additional resources to respond to a shockingly neglected aspect of the crisis – the unacceptable number of young people who have grown up in state care who move in to homelessness when they reach 18.

Budgetary allocations are only one dimension of the actions we need to take to end the housing and homeless crisis. There are many actions that require reform of processes and legislation and Focus Ireland has addressed these aspects in other submissions and statements. In this document we have, as much as is possible, concentrated on areas where we believe progress is being held back because of lack of finance, or where finance is required before the other barriers can be addressed.

Addressing these challenges would truly deliver a ‘budget for homelessness’.

Department of Housing, Planning and Local Government

Housing Supply

While homelessness is a complex problem, frequently requiring the collaboration of a range of social and health interactions to resolve, there can be no end to the problem without an adequate supply of affordable, secure housing. The supply of this housing remains the cornerstone of Government homeless strategy, as set out in Rebuilding Ireland. While it is true that most of the targets in Rebuilding Ireland are being met, the fact that the housing and homeless crisis continues to deepen gives a clear indication that these targets are not sufficient.

In this context, Focus Ireland recommends a number of measures to increase available housing supply, above and beyond the commitments already made. In making these proposals we are conscious that, in many cases, lack of finance is not the only factor holding back delivery. However, without the clear allocation of resources there is less incentive for policy makers to address the land management, planning and logistical issues that also hold back provision of adequate supply. As noted in the Government's capital plan,² the 'causes of under-supply are complex' but capital expenditure is 'a key element of that response'.

Increase the capital budget for social housing provision

A key issue underpinning the current crisis of homelessness is the level of public investment in public housing since the 1980s: public housing now accounts for only about 10% of the total housing stock.

Rebuilding Ireland implicitly envisages the majority of social housing units would be constructed by the private housing sector – and then acquired as social housing through Part 5, leasing or other mechanisms. The private housing development sector has been much slower to boost supply than was envisaged in Construction 2020 (2014) or more recently in Rebuilding Ireland (2016). One result of this is that there is increasing competition between the policy of acquiring private housing for social use and the aspirations of prospective owner-occupiers both competing for an inadequate supply of privately built housing. Ever increasing rental returns mean that private investors are outbidding first-time buyers, who are constrained by Central Bank borrowing limits.

This situation is resulting in a number of pressures which may have negative consequences: including local political pressure to stop local authorities acquiring new housing stock and pressure to ease Central Bank controls.

²² Department of Public Expenditure and Reform (2016): Building on Recovery: Infrastructure and Capital Investment 2016-2021, pp33

It is becoming increasingly clear that the Rebuilding Ireland target for 15% of the 134,000 ‘new social housing solutions’ to be new build social housing is insufficient to the scale of need that is now apparent. To date, policy makers have treated this as an ‘ideological’ question – concluding that it does not matter whether it is public or private enterprise that builds the housing units. While there are welcome signs that the private development sector is beginning to deliver increased levels of supply, it is starting from a very low base and will, even on the most optimistic projections, take several years to reach the required capacity. This is not an ideological question, it is a pragmatic question of how to get the houses constructed. It is certain that the public sector must make a larger contribution to the construction of new housing than was anticipated.

The Government made a welcome start in recognising this in the 2018 budget, with funding being made available so that the total number of social housing units to be constructed over the life-time of the programme was increased by 3,000. In 2018, this was to mean that 800 social homes which would have been acquired from the market were instead to be constructed. However, this was linked with a decrease in the acquisitions programme for the year, meaning that the target for additional social housing remained unchanged. The 2019 budget needs to take further steps to increase local authority/AHB construction of social housing, but this should not be cancelled out by a reduction in the commitment to acquisition.

While Rebuilding Ireland promises €5.35 billion in capital for new social housing, much of this only becomes available towards the end of the strategy. By then, the human and social damage done by the homeless crisis will present an even greater of a challenge.

The Housing Finance Agency (HFA) has argued compellingly that it can expedite the construction of new social housing, built by local authorities and funded by loans from the HFA. Focus Ireland notes the observations of both Frans Timmermans³, First Vice President of the European Commission, and Andrew McDowell⁴, vice president of the European Investment Bank, that the current rate of provision of social housing constitutes an infrastructural deficit.

Capital to build social housing

- Increase the capital allocation for social housing by €400 million above the current provision, to finance an additional 2,000 additional social housing new builds to be delivered in 2020
- Sanction a €1.3 billion borrowing capacity for the Housing Finance Agency to finance construction of an estimated 6,500 additional new build social homes by 2021

³ https://www.oireachtas.ie/en/debates/debate/joint_committee_on_foreign_affairs_and_trade_and_defence/2017-02-21/3/

⁴ <http://oireachtasdebates.oireachtas.ie/Debates%20Authoring/DebatesWebPack.nsf/committeetakes/CBO2017062900002?opendocument>

Provide capital support to deliver a substantial level of Affordable Rental units

Ireland is severely lacking in affordable rental options⁵. Households reliant on low incomes can't compete effectively in the private rented sector, and often end up saddled with unsustainable rent levels. Many low-income households find themselves in a double bind: not eligible for supports that would enable them to pay their rent, but not able to secure home ownership either. These are the households at significant risk of homelessness, indeed we know that about half of families who become homeless had previously been in the private rented sector.

Rebuilding Ireland had committed to introducing an affordable rental scheme. This commitment is now to be progressed using a cost rental model targeting middle income households on publicly owned land in Rent Pressure Zones (RPZs), a congested and slow mechanism. While the original commitment was to have been delivered by the third quarter 2017, the most recent status report⁶ indicates that this model of provision is currently only a pilot stage. The recent announcement of cost rental accommodation in Michael's estate, while welcome, will take many years to come through the planning and procurement procedure.

To expedite the delivery of a more substantial number of affordable rental units, two obvious routes present. Firstly, some of the larger Approved Housing Bodies (AHBs) have both the capacity and the inclination to provide affordable rental but need both some initial financial support and a settled policy framework. Under a cost rental model, it may be possible to access this funding through European institutions. To facilitate such lending a policy decision to establish an affordable/cost rental tenure is required⁷ (as originally proposed in Rebuilding Ireland). Secondly, there is the option of establishing a publicly owned commercial enterprise to develop new cost-rental homes⁸, as proposed by the Nevin Economic Research Institute (NERI) [update].

Affordable Rental

- Establish an affordable rental scheme provided by AHBs, providing exchequer funding to enable financing to be drawn down from European institutions.

⁵ Brooke, S. & Downey, D. (eds) (2008) *Rental Systems in Ireland The Case for Change*. Dublin: Focus Ireland. <https://www.focusireland.ie/wp-content/uploads/2016/04/Brooke-Downey-2008-Rental-Systems-in-Ireland-The-Case-for-Change.pdf>

⁶ Rebuilding Ireland Status Report Q1 2018

⁷ See observations from Vice President of the EIB to the Oireachtas Committee on Budgetary Oversight: "In other European countries, there are social rents, the private sector and a middle ground of affordable rents and tenure, which may be between 50% and 80% of market rents, and that would probably be sufficient to cover the debt financing necessary for the construction of the houses ... It is probably a policy issue for the country as to whether it wants to develop a new middle tenure form" (p.19) Available at: <http://oireachtasdebates.oireachtas.ie/Debates%20Authoring/DebatesWebPack.nsf/committeetakes/CBO2017062900002?opendocument>

⁸ Healy, T. & Goldrick-Kelly, P. (2017) *Ireland's Housing Emergency - Time for a Game Changer*. Dublin: WP 2017/No 41. Available at: https://www.nerinstitute.net/download/pdf/irelands_housing_emergency_time_for_a_game_changer.pdf

Enhanced Leasing Scheme

As noted above, leasing of private accommodation becomes an increasingly significant part of the social housing supply from 2018 onwards. To support this programme, the Department of Housing introduced the 'Enhanced Leasing Scheme' in January 2018. The Enhanced Leasing Scheme provides for property owners to enter into 20-30 year commitments to lease housing units to local authorities for social housing. Questions have been asked about the value-for-money for this scheme, but one long-term aspect of the scheme is a cause for grave concern: what will be the status of the units after the lease period? Under the previous leasing scheme there was a provision that the local authority had the first call to enter into a new lease period if the need for social housing continues at the end of the lease. Under the new scheme, this provision has been abolished so that the private developers will, having had the full cost of building the scheme covered by the taxpayer over 20-30 years, be able to take the units into private use or sell at market rates. It is understood that this clause was removed because of resistance by private developers, but simply to avoid the impact of these programmes being included in the general government debt.

Focus Ireland recognises that the level of Government debt remains a considerable problem, however we believe that the decision to drop the longer-term commitment to providing social housing from the leasing scheme is an example of short-term thinking which will be profoundly regretted in years to come. The scale of social housing which it is planned to provide through this mechanism means that we are storing up huge problems in housing large numbers of social housing tenants, huge costs to the state and huge profits to private individuals when these leases expire.

The Minister for Finance should make provision to include these schemes in the general government debt in the 2019 budget and the lease terms amended accordingly.

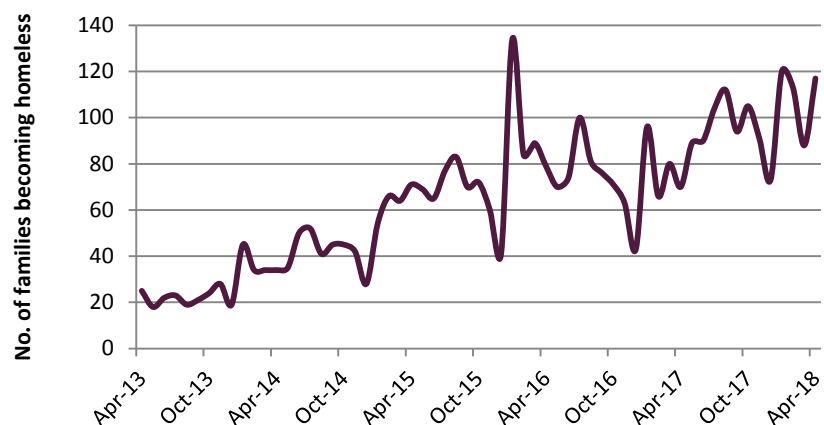
Preventing Homelessness

Dedicated funds for targeted measures to prevent homelessness

Voluntary organisations and local authorities are supporting more households out of homelessness than ever before. In 2017, over 3,000 households were supported out of homelessness. To put that in perspective, if we had achieved that sort of impact in, say 2010, we would have totally ended homelessness that year.

The reason that this extraordinary achievement is not reducing the level of homelessness is that each month brings a further rise in the number of people becoming newly homeless. For example, while around 20 families were becoming homeless each month in 2013, in April 2018 117 new families presented needing assistance in Dublin alone.

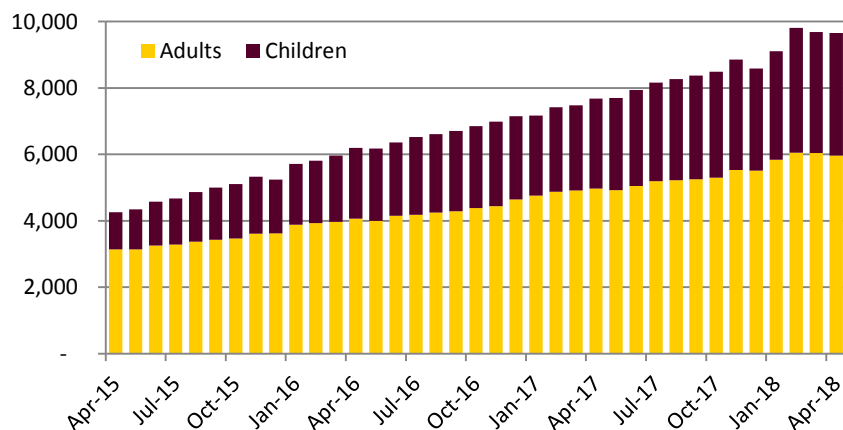
Figure 3: Families becoming homeless for the first time, Dublin⁹



As a result of this inflow into homelessness, in the last three years the number of people relying on emergency accommodation for a roof over their heads increased by 127% overall; this includes the 230% rise in the number of children who are homeless over the same period.

While a number of welcome measures have been taken to prevent homelessness, the homelessness crisis cannot be tackled effectively without a more strategic investment in prevention. One of the factors holding this back is lack of dedicated funding. For example, in 2016 over €96m was spent on providing services for people who are homeless in Dublin, but less than 5% of this went on prevention, tenancy sustainment and resettlement supports¹⁰.

Figure 4: Number of people in emergency homeless accommodation



Focus Ireland strongly believes that current investment in prevention – e.g. ad campaigns, Threshold’s Freephone service – needs to be maintained and supplemented by a new targeted strategy to increase impact.

⁹ Focus Ireland administrative data, verified with DRHE from January 2015 onward

¹⁰ Dublin Region Homeless Executive: €4,182,365, or 4.3%, of the €96,254,326 total
<https://www.homelessdublin.ie/info/funding>

With the funding support of our corporate partners, Focus Ireland piloted such an intervention in Dublin 15¹¹. Working with the Department of Employment Affairs & Social Protection, over 165 families relying on Rent Supplement were contacted, and referred to clinics run by trained prevention workers. Three quarters of these families had no previous contact with state funded prevention services. Nine in ten were supported to either maintain their current tenancy, or find a suitable alternative. Two key factors are identified in contributing to this high rate of effectiveness:

- An effectively targeted campaign can use collective knowledge and contact information to identify households at risk of homelessness;
- Better access to skilled Housing and Information services works to prevent homelessness.

Groups who are at risk of homelessness are well documented – people on rent supplement, single parents, people in the private rented sector. A number of administrative data-bases exist through which these groups could be targeted with information and offers of support.

Innovative approaches to preventing homelessness need to be encouraged and explored. An innovation fund to which organisations can apply to support prevention campaigns should be set up. All interventions should be rigorously evaluated so that successful approaches can be extended. The fund should be able to engage the practical co-operation of other relevant departments which have the capacity to contact vulnerable groups.

Resource targeted prevention

- Create an 'innovative homeless prevention' fund of €500,000 to support targeted prevention campaigns.

Provide Resources to Enforce Rent Pressure Zones and rental legislation

Measures designed to protect tenants in the private rented sector, while welcome, have little chance of making an impact in the absence of an enforcement mechanism, particularly where the rewards to landlord who ignore them are so substantial. Measures such as Rent Pressure Zones (RPZs) and legislative changes to protect tenants relying on income supports¹² can easily be ignored by landlords because they know that there is no way of ensuring they are enforced, or the penalties are so much smaller than the gains.

For example, the absence of consequences for landlords in relation to RPZ regulations means that 'bad' landlords are free to ignore these regulations when re-letting, while compliant landlords lose out. While it is now an offence to discriminate against someone because they rely on housing or social

¹¹ <https://www.focusireland.ie/wp-content/uploads/2016/04/D15-Homeless-Prevention-Report-Summary.pdf>

¹² Residential Tenancies Act 2004 and Equal Status Acts 2000 to 2015, as amended by the Equality (Miscellaneous Provisions) Act 2015

welfare supports, it is up to individuals to take a case. There are a number of administrative provisions for tenants where they are issued with a Notice of Termination arising from sale of the property or future use of the property by family. The protection for tenants in these circumstances should be stronger, but even when an individual presents as homeless to the local authority, there is no system in place to check that due process has been followed. Renters do not have the capacity to police these measures themselves.

Where these measures fail, the costs are borne both by individual renters, and by the state – which has to provide emergency accommodation. To reap the benefits of the preventative measures already introduced and those planned in the forthcoming legislative session, the Residential Tenancies Board must be resourced to monitor and enforce these policies; failure to fund enforcement is a false economy.

Resource enforcement

- Fund the Residential Tenancies Board to establish a system to monitor and enforce measures intended to prevent homelessness.

Supporting Emergency Homeless Services

Provide funding for a Case manager for every homeless family

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 ‘self-accommodating’ and are made responsible for finding their own emergency accommodation each night in Dublin. While families in Family Hubs and in hotels with long-term contracts are, in general, allocated to a case manager or key worker, these self-accommodating families, who are in the most vulnerable situation, are generally not allocated such support.

The support from a case manager would not only assist these families deal with the immediate challenges of finding nightly accommodation, they would support the families in planning their exit from homelessness. With the support of a case manager, families are more likely to leave homelessness to a secure tenancy and are less likely to suffer longer term social damage from their experience. Providing a case manager to such families would help reduce the likelihood that families are unable to secure accommodation and are at risk of sleeping rough.

Provide funding for a case manager for every homeless family

- Provide €700,000 to DRHE to employ an additional 10 family case managers so that every homeless family is allocated a case manager.

Increase HAP levels and extend Homeless HAP to all RPZs

Where a household is homeless, they are eligible for Homeless HAP, which allows discretion about the amount of rent that can be paid to be up to 50% above the formal maximum. It also allows other crucial practical arrangements like provision of a deposit and the payment of rent in advance, which are essential to secure housing the current rental market. However, Homeless HAP is only available in the Dublin area. Only a 20% discretion above the formal maximum rent is available in other areas, making it more difficult to support households out of emergency accommodation. Homeless HAP should be available in all designed RPZs.

The formal maximums rent payable in all cases should be reviewed to better reflect market rents. There is growing evidence that the difference between the actual rent and the rent payable by HAP is being covered by tenants. This practice pushed households below the minimum income levels established by Supplementary Welfare Allowance, creates deep poverty and long-term housing insecurity.

Supporting Exits from Homelessness

Resource delivery of Housing First nationwide

Housing First is recognised as the most effective approach to ending chronic homelessness and rough-sleeping, and Ireland has established itself as a European leader in this regard.

By Q1 2018, the Focus Ireland and Peter McVerry Trust partnership had created 224¹³ of the Rebuilding Ireland target of 300 Housing First tenancies in Dublin. The primary constraint on the roll out of this effective solution to homelessness is the availability of homes. The members of the existing partnership, along with the other homeless organisations collaborating in the Housing First Good Practice Platform have the capacity and expertise to extend the approach to Cork, Limerick, Waterford and Galway.

A Housing First Implementation Plan, promised under Rebuilding Ireland, will be published later this year. It is essential that this Implementation Plan makes available sufficient funds to provide Housing First at sufficient scale. The funding should be adequate to cover housing supports, health needs,

¹³ Rebuilding Ireland Action Status Report Q1 2018

social integration for the beneficiaries, as well as the professional training and independent evaluation costs. If it is decided to provide the next phase of Housing First nationally through a tendering process, the competition should be on a fixed price, covering the full cost of the service, with organisations presenting best practice rather than cutting costs.

The Implementation Plan should also include ring-fenced support for the provision of appropriate housing to ensure delivery of the programme.

Housing First

- Provide adequate resources to deliver the National Housing First Strategy

Housing for Vulnerable Young People

Focus Ireland has welcomed the Rebuilding Ireland initiative (action 1.07) to enable AHBs access Capital Assistance Scheme funding to provide homes for young people leaving state care. This initiative has the potential to have long-term impact, significantly reducing the risk of homelessness among a very vulnerable group. This requires investment that is both sufficient and sustained.

Last year, the Housing Minister noted that the Department’s approach to this initiative was to “monitor the demand and requirement for such housing” and to make allocations accordingly¹⁴. This is a reasonable approach in the initial phases, but we need to not only manage the current crisis, but ensure that measures taken now contribute to preventing such crises in the future.

While young people leaving care are particularly vulnerable, the allocation process for social housing, which prioritises the length of time on the housing list (and number of dependents), militates against young people who are eligible actually getting access to social housing.

This initiative can help to build up a stock of social housing, in mixed tenure communities, for vulnerable young people, but to do that it needs to go beyond responding to immediate demand. Around 950 of the 6,000 adults who are homeless are under 25. Focus Ireland recommends that 10% of CAS funding be ring-fenced for this purpose.

Homes for vulnerable young people

- Allocate 10% of Capital Assistance Scheme funding to building up a stock of social housing for vulnerable young people.

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

Department of Children and Youth Affairs

Rebuilding Ireland recognises that addressing homelessness effectively must be a whole of government initiative. The Department of Children and Youth Affairs, along with Tusla, has responsibility for a number of interventions that are critically important in both preventing and mitigating the impact of homelessness. These relate to minors who are 'out of home', vulnerable care leavers, and addressing the needs of children in families who are homeless.

Youth homelessness

Expand Family mediation services to prevent youth homelessness

The major study into youth homelessness in Ireland¹⁵, found that family conflict or arguments with carers were key factors in young people leaving home and becoming homeless. In some situations, where the conflict results from neglect or abuse, a permanent exit from the family home may be in the young person's best interest. However, for many young people and their families, reconciliation can be achieved with the support of family mediation, preventing homelessness at a critical juncture in the life of a vulnerable young person.

Focus Ireland, in collaboration with Tusla, launched its pilot Family Mediation service in Dublin in June 2016. The service successfully supports young people to return to the family home and to improve their relationships with family and carers. The referral system is of crucial importance in such services, and referral in this pilot was through the Tusla Crisis Intervention Service, which refers young people in emergency accommodation, or at serious risk of homelessness, to the service. In 2017, the service supported 22 teenagers at high risk of homelessness to stay in the family home.

The service initially funded one mediator from private donations, with Tusla support in terms of governance and referral. Tusla has made the welcome move of funding an additional mediator in Dublin. However, the private funding for the original mediator is no longer available.

Successful family mediation can prevent a life-time of recurrent homelessness, but delayed intervention can be too late to achieve this outcome. The success of this intervention is clear and the next stage in its development should be consolidation of the existing service in Dublin and the extension of the service to other Tusla regions.

Family Mediation Workers

- Mainstream the funding of the Family Mediator in the Focus Ireland Family Mediation Service in Dublin and provide funding to extend the service to one other regional centre, at an annual cost of €126,000.

¹⁵ Mayock, Parker, Murphy (2014) *Young People, Homelessness and Housing Exclusion*.

Increase the effectiveness of Aftercare for vulnerable young people

Focus Ireland welcomes progress over the last number of years in establishing statutory rights to aftercare for young people leaving the care of the state; most particularly for vulnerable young people, such support plays a vital role in preventing homelessness.

While Tusla has made welcome progress towards ensuring that every young care leaver who needs and aftercare worker is allocated one, this has often resulted in resources being stretched through increasing the caseload of aftercare workers.

To deliver an effective service, Focus Ireland aftercare services historically operated a caseload of 15-20 young people per aftercare worker; more recently some Tusla regions have required an increase in case load to 22-25, and caseloads extending 30 young people are not uncommon in some services. This is too high for the service to meet the needs of the more vulnerable care leavers that are at greatest risk of homelessness: particularly in a period where housing is so hard to secure this is a false economy. Focus Ireland's experience, and that of internationally recognised good practice, indicates an optimum caseload of 15-20 young people per support worker, not least to enable the continuity of support that vulnerable young people need.

Aftercare Workers

- Resource Tusla to provide an aftercare worker (with at 1:20 caseload) for all care leavers who need one.

Supporting young people to earn a living

A critical component of addressing homelessness among young people is ensuring they have the capacity to earn the income to secure their home. While improvements to the level and consistency of financial support for care leavers continuing in formal education are most welcome, this is not suitable for all, and some young people will be more oriented towards the labour market. These young people must rely on the mainstream labour market supports provided by DEASP and Intreo: services that are not designed to meet the specialised needs of vulnerable young people leaving state care. While there has been a welcome return to labour market demand, these young people are at high risk of becoming NEET, and unable to access these opportunities without such specialised support.

Through private funding, Focus Ireland has developed a service specifically designed to meet these needs: *Employment Focus for Youth*. Experienced recruitment staff supported vulnerable young people through every aspect of the job search process and maintain relationships with employers who then provide employment opportunities. Due to changes in funding, Focus Ireland is currently reviewing the future of this service but remains committed to the central role of labour market integration for this group of young care leavers.

Young people leaving state care, but not continuing in full-time education, need support if they are to make a successful transition into the labour market. Current policy appears to rely excessively on unemployment payments for this group of young people, and there is no clear labour market activation policy. They should be supported to develop an Employment Plan with their aftercare worker, with Tusla supporting the costs arising (e.g. participating in training, appropriate clothing, travel to job interviews etc.) as is the case for those continuing in education.

Labour market supports for young care leavers

- Resource Tusla to support the labour market transition costs of care leavers, at a commensurate level to the support provided to those remaining in education.

Family homelessness

Reduce the risk of domestic violence resulting in homelessness for the victims

Focus Ireland undertakes regular surveys of families becoming homelessness; domestic violence is frequently cited as a contributory or causal factor in becoming homeless¹⁶.

Domestic violence charities report that services have seen a significant cut to their funding from Tusla over the last number of years¹⁷. These services are now under considerable pressure, in part as a consequence of the current crisis and the lack of affordable housing options for those fleeing violence, and reports of refuges being forced to turn away women and children abound.

Rebuilding Ireland commits to providing an unspecified number of additional domestic violence refuge spaces, to be delivered in 2016-17¹⁸, and this action is recorded as complete with the provision of funding for an additional 8 units of emergency accommodation for families fleeing domestic violence.

Tusla is not required to provide a regular report on the number of families seeking and accessing accommodation in domestic violence refuges, as is the case in homeless services. Focus Ireland, in providing support to families who become homeless, believes this provision is inadequate to need, and calls for funding to double this level of output in Budget 2019. Services responding to domestic violence have suffered considerable reductions in statutory funding; this Budget should restore that funding to enable a better response to families fleeing violence.

¹⁶ <https://www.focusireland.ie/wp-content/uploads/2018/04/Sheridan-2018-Insights-into-Family-Homelessness-No-12-Families-Exiting-Homelessness-An-Analysis-of-March-2016-Telephone-Survey-Cohort.pdf>

¹⁷ <https://www.irishexaminer.com/viewpoints/analysis/funding-for-domestic-and-sexual-violence-support-services-inadequate-454653.html>

¹⁸ Rebuilding Ireland, Action 1.08. The Action Status Report for 2018 records this action as 'complete' with funding provided for 8 additional units of emergency accommodation for families fleeing domestic violence in Dún Laoghaire, Clare, Galway and Sligo.

Refuge from domestic violence

- Restore funding for domestic violence services to pre-crisis levels
- Fund a further 8 units of emergency accommodation for families escaping domestic violence, and require monthly reports on demand for and access to such services, in line with data collection on homelessness by local authorities.

Ensure every child who is homeless and needs special support receives it

Homelessness among families continues to rise, with a growing number of children spending a considerable portion of their young lives in the constrained conditions of emergency accommodation. Rebuilding Ireland includes a number of provisions to ensure appropriate support for the children of families that remain homeless, but the rising level of family homelessness mean that current resources are inadequate to the scale of need.

Focus Ireland has published research on the impact of homelessness on families¹⁹, which indicates both the valuable support that caseworkers provide to mitigate the impact of homelessness, and that there are too many children living in homeless accommodation for the number of caseworkers currently available. In the 2016 budget, Tusla provided funding for three additional child support workers as part of the Family Homeless Action Team. However, the number of children who are homeless has almost doubled since that provision. While some of these additional children are supported within Homeless Hubs, there is a growing waiting list of children who are professionally assessed as requiring support but are not receiving it. The long-term consequences of this neglected need are incalculable.

Focus Ireland estimates that meeting the needs of children currently living in ‘family hubs’ and other emergency accommodation requires an additional 14 case workers.

Child support caseworkers

- To ensure that children who are homeless can access the support they need, provide €540,000 (full year cost) to fund additional child support caseworkers.

¹⁹ “Finding a Home” Harvey, B and Walshe, K (Focus Ireland, 2017) <https://www.focusireland.ie/wp-content/uploads/2017/12/Walsh-and-Harvey-2017-Finding-a-Home-Full-Report.pdf>

Department of Education and Skills

Resource effective 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, depression and reduced motivation. 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.

Ireland's principal policy response to educational disadvantage is through the DEIS programme, which is designed to target additional resources to schools in areas of socio-economic disadvantage. However, Focus Ireland in working with families who are homeless finds that about half of children are not attending DEIS schools²⁰. Those children therefore cannot access supports provided under DEIS, such as breakfast and free school meals, homework and after-school clubs etc. They cannot benefit from the help available through the Home-School Community Liaison, or the School Completion Programme, because they aren't in DEIS schools.

In the recent review of DEIS criteria the decision was made not to include prevalence of homelessness as one of the selection criteria. Focus Ireland supports this view, not least because the current level of family homelessness should not be treated as a permanent feature but a short-term crisis. However, while inclusion in DEIS is not the right response, with an increasing number of school children facing very significant educational challenges as a result of homelessness, a systematic response from the Department of Education is still awaited.

The Educational Welfare Service in Tusla should be adequately resourced to support schools and teachers with homeless pupils and to work with children living in emergency homeless accommodation in order to provide educational supports on a needs assessed basis.

Supporting children in school

- Allocate €500,000 to resource educational supports for children who are homeless, via the Educational Welfare Service.

²⁰ Focus Ireland Insights into Family Homelessness No.3. Available at: <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 Employment Affairs and Social Protection

Reduce poverty through adequate social protection for people of working age

Ireland's economy is no longer in crisis. Unemployment has fallen dramatically. Ireland is in the midst of a crisis of homelessness, and poverty is a prime cause of homelessness.

Basic welfare rates for people of working age were cut back considerably during the recession, and have not recovered since. The basic Jobseeker rate of €204.30 per week from 2009, adjusted for inflation, should now stand at €213.50, leaving those relying on social welfare incomes around €15.50 short in real terms.

As a first step towards re-establishing an adequate level of social welfare payment, Focus Ireland calls for working age payments to be restored to their nominal pre-crisis levels.

Income adequacy

- Increase the basic social welfare rate to €205, with pro rata increases for qualified adults and child dependents.

Provide normal 'adult' levels of welfare for young people at risk of homelessness

Particularly severe reductions in the social welfare entitlements of young people were introduced during the course of the recession, ostensibly to reduce the proportion of young people not in education, training, or employment.

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”²¹.

Ireland has yet to review the impacts of significantly reduced entitlements to income support for young people, but Focus Ireland highlights one particularly damaging consequence of this policy: homelessness among young people. This reduced payment rate is insufficient to maintaining an independent household, so that young people who have secured a route out of homelessness find themselves trapped because they can't afford to live independently. The long-term cost of this short-term saving may be very high indeed.

²¹ Benjaminsen & Busch-Geertsema (2009) 'Labour Market Reforms and Homelessness in Denmark and Germany: Dilemmas and Consequences'. *European Journal of Homelessness*, p.144. Available at: https://pure.sfi.dk/ws/files/207207/feantsa_ejh2009_article_5.pdf

Where a young person has the capacity to end homelessness, denying them the adult rate of social protection required to sustain independent living is counter-productive. To support successful exits from homelessness, young people should be entitled to the full adult rate of payment.

Income adequacy: young people

- Exempt young people leaving homelessness from the reduced rates of social welfare
- Commission an independent review of the impact of reduced social welfare rates for young people

Reduce the risk of homelessness by increasing Rent Supplement to reflect market rents

Affordability continues to be a critical constraint on the ability of those living in the private rented sector to secure their home; in particular, people reliant on Rent Supplement may find that there is no property available within maximum rent limits, and that off-the-books ‘top ups’ are required to secure a tenancy.

Rather than review these limits in an ad hoc manner, review should be built in as a regular, predictable and transparent aspect of the scheme.

Rent Supplement

- Increase Rent Supplement (and HAP) maximum rents in line with market trends; increase by at least 4% in Rent Pressure Zones.

Review state policies which underfund pensions for care staff in the voluntary sector

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.

Voluntary Sector Pensions

- 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 contribution towards the pensions of State-funded voluntary sector employees

LEAP Cards for school children in emergency homeless accommodation

The provision of LEAP cards to the families of school children who are living in emergency homeless accommodation was one of the very welcome developments in the early stages of Rebuilding Ireland and responded to a need strongly identified by Focus Ireland's Family Homeless Action Team.

In the academic year from September 2017 to end of June 2018, over 600 families comprising 1,400 adults and 1,630 children benefited from the distribution of 3,030 LEAP cards. The educational benefits from this are clear and the scheme must be continued for as long as the family homelessness crisis continues.

However, the scheme to deliver the LEAP cards was not developed as part of the existing programmes to support travel to school, either within the DEASP Community Welfare service or the DES School Transport Schemes. The scheme was developed as a stand-alone scheme within homeless services and as such involves a high level of administrative burden, which has not been funded as part of the scheme. The distribution of each card involves a complex and time-consuming process of multiple sign-off and data entry. In an understandable attempt to reduce the potential for fraud or misuse of the scheme, each LEAP card only has a value of – 150, so that the entire process has to be repeated every 4 weeks for adults and every 10 weeks for children.

At present the administration of this scheme falls to staff in the Focus Ireland Family Homeless Team. No budget is provided for administrative workers, so the work falls to the care workers who are thus taken away from their core work in supporting families to exit homelessness. Focus Ireland estimates that virtually the entire workload of one case manager is used up in delivering this scheme as a stand-alone programme.

All this is understandable in the context of the urgency of delivering the scheme to meet the needs of these families, but the opportunity now arises to review the programme. While one option would be to provide resources for administration of the existing scheme, a better option might be to integrate it with the well-established schemes already in place, in particular the schemes operated by the DEASP as part of its Community Welfare service.

Transfer administration of LEAP cards to families that are homeless with school-going children

- Review the administrative arrangements for distributing LEAP cards to families that are homeless and have school-going children, with a view to transferring the scheme to the existing schemes in DEASP or the DES.

Department of Finance

Vacant property tax

Pillar 5 of Rebuilding Ireland commits to making better use of existing housing which is currently vacant, and the Rebuilding Ireland site highlights that, according to the CSO, there are 183,312 vacant homes in Ireland.

A very significant amount of work has been undertaken by the Department of Housing, local authorities and AHBs, including Focus Ireland, to turn this potential into actual homes to help resolve out housing crisis.

A number of incentive schemes have been put in place in previous budgets to encourage the owners of vacant properties to make them available for rental. These incentive schemes appear to be reasonably generous, and with the increased market prices available for property, would have been expected to facilitate a significant shift

These housing units were frequently referred to as the 'low hanging fruit' in the national effort to end the housing crisis. However, to date the number of homes made available from this strategy has been only a tiny fraction of the potential suggested by the CSO figure.

In August 2017, Minister Murphy launched the long-awaited Vacant Homes Strategy, bringing together the various schemes and structures into a coherent shape.

The Strategy includes a reference to Department of Finance giving 'consideration' of 'targeted penalties' with the objective of increasing housing supply.²² This is a welcome but long-overdue step forward. The timescale for this action remains unclear. Action 5D appears to apply, but covers a range of other issues as well, and appears to say that the Department of Finance review is due in the first half of 2019. On this time scale, and given that such a tax would have to come with a fair warning, implementation of any tax could not be expected until 2021 at the very earliest. It is hard to reconcile this leisurely process with any serious attempt at securing the 'low hanging fruit' in a crisis which is damaging the lives of thousands of citizens.

The discussion of the issue in the Strategy is dominated by habitual references to 'constitutional issues' and 'unintended consequences'. The reference paid to the Constitution in relation to challenging property owners is in stark contrast to consideration of the constitutional rights of people facing homelessness (for instance, the rights of families to a family life and not to be separated when offered emergency accommodation; or the rights of children). Nor are these concerns reflected in the

²² National Vacant Housing Re- Use Strategy 2018 -2021 pp 43
https://www.housing.gov.ie/sites/default/files/publications/files/national_vacant_housing_reuse_strategy_0.pdf

lack of priority which has been placed on considering a 'right to housing' in the Constitution – although such a right has been recommended by the Constitutional Convention several years ago. The 'unintended consequences' of raising a whole generation in emergency homeless shelters features nowhere in discussion of this issue.

Much greater urgency needs to be shown in this area. It is clear that a number of owners of empty property are not moved by incentives or appeals to the public good. However, the prospect of a taxation penalty for leaving property vacant without good reason might well impel financial advisors and accountants across the country to advice much more active use of such property, to the clear and compelling public good. Measures to introduce a 'vacant homes tax' should be announced in the 2019 budget.

Vacant Home Tax

- Complete the Department of Finance review of a Vacant Home Tax with urgency and include provisions for such a tax in the 2019 budget, to be implemented in 2020.

Department of Health

Health related 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%.

Severe reductions in HSE funding during the course of the recession 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 to exit to independent living. 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.

To a large extent, these cuts were absorbed through wage cuts to the staff in the voluntary sector. While the public sector is going through a process of pay restoration, staff in voluntary sector services, particularly those funded by the HSE, have seen little pay restoration and, frequently, no increments for several years. This is leading to recruitment problems in front-line services, just when need is at its greatest.

While there has been an increase in the HSE Social Inclusion funding for homeless services in recent years, this is almost entirely going into new services. While these services, such as health supports to Housing First, are very welcome, this does not address the now chronic underfunding of the pre-existing services. There is an urgent need to increase the core funding levels from HSE social inclusion to homeless services in the 2019 budget.

Health related services for people who are homeless

- Increase HSE Social Inclusion funding for homeless related services by 8% in 2019.

Investment in mental health services recruitment

Recruitment of mental health professionals is a key challenge for the health service. While the recently published first report of the Public Service Pay Commission found no evidence of general difficulties in attracting staff to the public service in general, the Commission did find evidence of difficulties in recruitment and retention in a number of health areas, most particularly in mental health. While the Commission noted a number of issues that impact upon health recruitment, including pressurised work environments, clinical support and the ability to address inefficient health systems, it is clear that

these issues are exacerbated by recruitment and retention difficulties. In addition, there is strong international competition for health care staff²³.

Poor mental health can be both a cause and effect of homelessness for young people. Poor mental health is also a significant factor in inhibiting successful transitions into a secure home and independent living. Ensuring that vulnerable young people can access the support they need to address mental health needs, and develop resilience, is therefore an important component of tackling homelessness among young people.

Focus Ireland provides a housing led response to youth homelessness in Limerick. An independent qualitative evaluation of the service was undertaken to understand how effective the service is at improving the housing and non-housing outcomes of young people in the area. The evaluation found that while “much progress appears to have been made by the young people, the area that emerged as having the greatest unmet need was mental health”²⁴.

Similarly, research into the experience of families while they were homeless showed that parents were unable to obtain mental health supports for children who were experiencing very negative impacts of homelessness. Waiting times were so long that families had not yet received any support 6 months after leaving homelessness.

Mental health supports play a critically important role in preventing and addressing homelessness: poor mental health can result in homelessness, while failure to provide for mental health needs can undermine the impact of housing supports.

Mental health supports for homeless young people

- Allocate an additional €1m 2019 to the HSE Social Inclusion budget to provide mental health nurses and support workers for youth homelessness programmes and the children in homeless families.

²³ Report of the Public Service Pay Commission (p.58-9), May 2017 noted that there were recruitment and retention difficulties in relation to psychiatrists, mental health nursing and psychologists. Available at <https://paycommission.gov.ie/publications/>

²⁴ Lawlor, E. & Bowen, N. (2017) *Limerick Youth Housing Evaluation Report*. Dublin: Focus Ireland. Available at: <https://www.focusireland.ie/wp-content/uploads/2017/06/Limerick-Youth-Housing-Evaluation-2017-Full-Report.pdf>