

18<sup>th</sup> May 2020

Dear Taoiseach,

Focus Ireland welcomed the Government’s publication of a “Roadmap for Reopening Society and Business to ease the Covid-19 restrictions and reopen Ireland’s economy and society” at the start of the month. We understand that, given the scale of disruption to all aspects of the Irish economy and society, it was not possible to set out in that document a specific roadmap for the areas of our greatest concern – homelessness and the risk of homelessness.

Along with our colleagues in other NGOs, and with local authorities, Tusla and the HSE we have been working hard to minimise the impact of Covid-19 on people who are homeless and reduce the risk of additional people losing their homes. With the increased availability of private rental housing, we have, in partnership with local authorities, had two of our most successful months of supporting people out of homelessness into new secure homes. I know you have noted the success of that work to date, and, like all in the statutory and non-statutory sectors, our staff are rightly proud of what we have been able to achieve together.

In that spirit, we wanted to make a contribution to setting out a roadmap for our own sector. We are, of course, not in a position to do that on our own, it will be a collaborative effort. However, we wanted to make a start by drawing your attention to five areas which we believe will require special attention in the coming months as the Covid-19 restrictions begin to lift. No one has all the answers, but we all have important insights and contributions to make. Our aim in this letter is to set out a framework in which we can collaboratively develop a ‘Roadmap for Housing and Homelessness’ to complement the overall Government Roadmap for reopening society and business, and inform deliberations on a new Programme for Government.

## **Towards a Roadmap for Housing & Homelessness**

### **1. Securing the Safety of the Most Vulnerable Homeless People**

The first priority must be to consolidate and protect the achievements to date in protecting people who are homeless and among the most vulnerable in our society. Public health officials and our staff are aware that many people who are homeless will become more vulnerable as restrictions ease, as they will encounter more people on the streets.

- The need for cocooning of the most vulnerable homeless people will continue for the foreseeable future, and resources must be secured to enable this. Dr Austin O’Carroll, the clinical lead for the very successful programme in Dublin, has indicated that this will be necessary to avoid the small spike in cases, which is expected as mainstream restrictions come to an end, resulting in a sudden cluster of cases in emergency accommodation settings.
- As in the general population, the lockdown has led to postponement of treatment for physical illnesses and also serious challenges in mental health for many people who are homeless. Increased

access to primary care and clinical supports at a community level is essential to minimise the negative effects of lockdown on the mental and physical health of those with complex support needs and histories of homelessness.

- There are a small number of people who are homeless in our cities who are undocumented migrants from EU and non-EU countries, some of whom have remained outside of the shelter system even during the health emergency. Their vulnerable position is exacerbated by the closure of borders, but this also provides an opportunity to design a once-off plan which will bring them into the system and allow us to solve their homelessness.

## **2. Maintaining the gains as part of the ‘New Normal’**

While the period of the Covid-19 emergency has been tragic and destructive in many respects, there are some aspects of policy and collaboration that we need to work hard to maintain. We should also use this as a valuable opportunity to improve on what we considered ‘normal’. The old ‘normal’ should be re-examined to ensure that it is the best possible way of safeguarding those who are homeless and enabling them to exit homelessness for good.

- Social distancing and cocooning among people who are homeless has been achieved, in large part, through the acquisition of hotel spaces and apartments, allowing decanting from congregated emergency homeless accommodation. Even aside from the public health considerations, social justice requires that people who have been kept safe in hotels or acquired short-term rented accommodation must not suddenly lose this accommodation without being offered a permanent exit from homelessness.
- Where emergency accommodation continues to be required, the response to the pandemic showed that it is within our capacity to provide better-quality homeless accommodation, eliminating one-night-only and ‘night-only’ accommodation. We must not allow such inferior accommodation to return to the system.
- The pandemic also highlighted the high number of empty short-term lets in Irish cities which, contrary to Government regulation, were operating without planning permission. Many of these meet RTB regulations and they should not be permitted to return to the short-term let market, without appropriate planning approval. Some short-let apartments fall below the RTB standard, and the number of these should be monitored. If necessary a programme to support their upgrade should be considered.
- In many local authority areas, AHBs and homeless organisations worked much more quickly and collaboratively to ensure that opportunities to secure new homes could be taken. A lot of the red-tape and delays which have been frustrating for all sides were overcome. A collaborative review of these successes should be undertaken to ensure that these more effective and productive working arrangements are maintained.
- While overall figures are not yet available, preliminary results from Focus Ireland’s Housing First services indicate a significant move forward in providing homes for people who have been chronically homeless. While it has not been without its challenges, the pressures of the Covid-19 crisis have shown the strength of the Housing First response and the opportunity now arises to lift this from being ‘one programme among many’ to be the underlying approach of our whole homeless system.

## **3. No ‘second wave of homelessness’**

In the face of the immediate crisis, the Government took a number of very welcome emergency measures to prevent eviction etc. Overall these were successful and effective in reducing the number of people becoming homeless through a number of key routes – for instance the number of families becoming homeless dropped to around a quarter of the previous level. However, many of these were essentially ‘holding’ mechanisms and the resulting backlog of debt, pending Notices of Termination and social pressures will need to be managed to ensure that the lifting of restrictions is not accompanied by a wave of new homelessness.

- **Moving on from the private rental eviction moratorium.** There is a danger of a sudden high number of evictions after the moratorium is lifted, arising from accumulated issues, and resulting in a large number of people entering homelessness. In some cases the issue will be rent arrears, and to minimise evictions arising from this, the end of the moratorium needs to be announced well in advance, alongside clear and accessible routes to negotiate and support restructuring arrangements. In some cases, Notices of Termination will relate to allegations of Anti-Social Behaviour during the lock-down. While ASB cannot be condoned, and both landlords and neighbours have rights that must be respected, these can be complex issues, more related to mental health problems of tenants during the lock-down. Clear guidance details about rights and responsibilities of tenants and landlords in this situation are essential, as well as well-resourced and timely expert mediation. Where people remain unemployed or under employed for longer periods of time, neither the Rent Supplement (which is currently designed for short-term circumstances) or the Housing Assistance Payment (HAP, which is for long-term housing need) are appropriately designed to support the large number of people who will require medium term support to secure their homes.
- **Protections for Mortgage Holders.** There is a risk in lifting the mortgage moratorium while large number of people remain out of work or underemployed due to Covid-19. Supports for these people should continue for a period after other restrictions have been eased to bridge this gap. Consideration should be given to reintroducing support for mortgage interest payments for households where return to employment will be delayed.
- **Household relationship breakdown.** The lock-down has put a lot of pressure on relationships within households. These pressures have been seen, for instance, in youth services. It is likely that when it is deemed 'safe' to leave the home, some of these strained relationships will result in people leaving households without a secure place to live. A ramping up of effective and appropriate youth and family mediation services would help in many of these cases.
- **Domestic Violence.** There are, of course, other cases involving physical or mental abuse where mediation is not an appropriate response. Domestic Violence services report being overwhelmed with demand during the lock-down, and the Garda have reportedly made it a priority to respond to incidents in a timely and effective manner. While circumstances may change with the lifting of restrictions, the underlying problems will not disappear and many victims of abuse will take the opportunity to escape the abuse which were not possible during the lock-down. Domestic violence services need to be resourced to respond to this need, and legal remedies which keep the victim in the family home need to be actively pursued.
- **Childcare supports.** Solutions to providing reliable and affordable childcare for working parents are critical to enabling a return to work in many parts of the economy; in their absence many parents will be placed in difficult situations. Some of the worst affected sectors are also those in which precarious working arrangements are commonplace. In particular lone parents will find it impossible to return to work without access to affordable childcare, relying on unpaid leave will leave them struggling to pay their housing costs – and lone parents are already significantly over-represented among families who are homeless. Lack of access to affordable childcare is an issue which can quickly lead to rent arrears and indebtedness, resulting housing instability and homelessness.

#### 4. Restarting the Construction Industry

The Covid-19 emergency may impact on immediate housing demand as the economy recovers, but it is almost certain that the underlying shortage of dwellings will persist, and that the construction of more homes will remain a national priority. The Covid-19 emergency presents not just a hiatus in construction itself but also deeper problems of finance and market uncertainty for private developers. The responsibility of Government to play a key role in our housing system had been broadly recognised even before the Covid-19 emergency and it is even more crucial now.

- Focus Ireland has been consistent in our belief that building new social homes is essential to combatting Ireland's homelessness crisis. The Covid-19 lockdown has put into even clearer focus the importance of having a safe and stable home for all in our society.
- While the Covid-19 pandemic has already impacted housing construction, it is important that we do not lose sight of the need to ensure that new social housing comes on-stream so that people can continue to exit homelessness for good.
- This must be balanced with ensuring safe work environments for those in the construction industry. Regular inspections of building sites as construction workers return to site should be made to ensure that social distancing measures are feasible and enforced.

## **5. Managing the transition**

The collaborative approaches to tackling the Covid-19 emergency itself have been paralleled by a greater emphasis on new forms of social and economic partnership around broader issues of recovery. The challenges facing the housing and homeless systems are an excellent example of where such partnership can lead to more effective progress. The roadmap for the housing and homeless sector should be developed and then rolled out using such a collaborative approach. Central government needs to play a leadership role in creating appropriate local structures for such collaboration. A joint approach between the Department of Housing, Planning and Local Government, and Department of Health, along with the voluntary organisation represented by on the National Consultative Forum, would be a positive start.

We hope that drawing attention to these issues, concerns and potential solutions is helpful in your deliberations. We all have the opportunity now to reflect and improve upon our work to end the housing and homelessness crisis in Ireland. We believe this provides a first step towards a roadmap from which to start this challenging yet crucial period.

We look forward to working with you to ensure that the most vulnerable continue to be protected as the Covid-19 restrictions begin to lift.

Yours faithfully,

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Pat Dennigan  
CEO  
Focus Ireland