

Submission to Oireachtas Committee on Housing: Opening Statement.

February 2022

Introduction

Focus Ireland welcomes the opportunity to attend the joint Oireachtas Committee on Housing, Local Government and Heritage and contribute to assessing progress on your April 2021 Report.

To avoid taking up the time of the Committee with a long description of the work that Focus Ireland does or the unique approach we take, we have included links to our most recent Annual Report¹ and to our Strategic Plan.²

Since your 2021 Report, the Government has published its 'Housing For All' strategy. From our perspective, the most significant words in the strategy are its endorsement of the Lisbon Declaration - to work with other EU countries to end homelessness by 2030. We are aware that the strategy does not set out exactly how that objective is to be met, but we do not consider this to be a criticism. Focus Ireland campaigned for such a commitment, we not only welcome it, but are also fully committed to working to achieve it, and to working with Government and Opposition to identify what this will require.

We have argued that the next step should be to set out a series of milestones along the path to 2030, with detailed plans about how the first of these are to be reached. Before Christmas we sent you a booklet of drawings made by the children who are homeless with their families and who we support. Those drawings contained a clear message imploring you to ensure that ending child homelessness becomes one of our first milestones. We strongly recommend that the next report on Homelessness from this Committee should seek to identify the milestones to 2030, and how they are to be reached.

Evictions from the private-rented sector

It might be helpful to see the pathway to 2030 in terms of three three-years stages. In doing so, we realise that very few people who are homeless now will be homeless in three years, and very few people homeless tonight will be homeless in three years. This points us towards measures which will prevent people from becoming homeless.

Hearings for the Committee's previous report coincided with a time when the Covid-related moratorium on evictions was coming to an end. Professor Eoin O'Sullivan noted the significant impact that the termination of tenancies in the private rented sector had on homelessness, notably leading to the lowest ever numbers of new entries into emergency accommodation by April 2020. The report also noted, based

¹ Focus Ireland Annual Report 2020 <https://bit.ly/3Bg5mxG>

² Restating our Vision 2021–25: Focus Ireland Strategic Plan <https://bit.ly/FIStrategy>

on Focus Ireland research, that the termination of tenancies in the private rented sector was the biggest driver of numbers into emergency accommodation.³

Regrettably, the Government did not adopt your recommendations (Recommendation 1) to extend the eviction embargo, resulting in a new wave of family homelessness.⁴

In our view, there is little point in continuing to call for something the Government has so resolutely set itself against. But the problem continues, forcing families into homelessness daily, so we must find other ways to deal with it.

We agree with Government that a balance needs to be struck between the rights of tenants and those of landlords, but we believe that the Government has consistently got this balance wrong – introducing measures which do little to increase the security of tenants yet create anxiety and frustration among small landlords.

We believe that a major effort is now required to ensure, at the very least, that landlords who plan to leave the market delay their decision by a number of years. We are happy to discuss these proposals further.

Evictions from HAP tenancies

Your report identified the gap between the maximum HAP payment and the level of market rents as a major problem (Recommendation 4). This gap has widened in the intervening months. HAP levels were last adjusted in 2016, and the RTB rent index has risen by 30% since then (from €1,060 to €1,397).

HAP tenants attempt to close this gap from their already inadequate income from employment or social welfare.⁵

We want to draw your attention to the fact that tenants offered the ‘social housing solution’ of HAP are treated entirely differently and much more harshly than tenants in actual social housing. This is resulting in entirely avoidable evictions, and indebted returns to homelessness. It also further disaffects landlords. We have made proposals to tackle this which we will be happy to discuss further.⁶

³ In retrospect, it is clear that the eviction moratorium had a very significant impact on the number of families becoming homeless but much less of an impact on individual adults.

⁴ The effect of removing the Covid related protections was gradual from April 2021 onward, due to the notice periods involved. After continued declines in the first quarter of 2021, there were 1,077 families homeless at the end of 2021, 107 (10%) more than a year earlier. Over the past 6 months has been that the number of children experiencing homelessness is increasing at a faster rate than adult homelessness (20% increase in the number of children experiencing homelessness compared with 12% for adults).

⁵ Recent work by Focus Ireland has shown that some Homeless HAP tenants are paying up to €650 per month top-up to their landlords, with the minimum reported as 180/month and an average of €350/month.

⁶ We have proposed that the arrears scheme for HAP should be the same as for other social housing. A case management intervention should be added to the arrears process prior to suspension of rent payments. HAP administration should collect all rents (including differential and top-up) and transfer the top-up along with the HAP rent to the landlord. Local Authorities should reduce the differential rent where after-rent incomes are below SWA levels. The number of H/HAP tenancies terminated each quarter should be reviewed and published.

Housing First

Your report correctly identified the importance of Housing First in tackling homeless (Recommendation 3). At the end of last year, the Government published the Second Housing First Implementation Plan. We welcome this plan and the establishment of the new Housing First office in the Housing Agency but believe that the current approach to Housing First is too narrow. We believe the achievements of Finland arise from ensuring that Housing First principles inform the entire housing and homelessness system. We would be happy to discuss this area, and the need for 1-bed room units (Recommendation 4) further.

Trauma informed practice and Domestic Violence

Finally, we want to commend your recommendations in relation to trauma-informed practice (Recommendation 8). Recent research commissioned by Focus Ireland and the Housing Agency, on Domestic Violence and Homelessness,⁷ called for staff in all relevant service sectors, including homelessness, domestic violence, and housing, – regardless of their position or prior training – to be trained in basic trauma knowledge to ensure that their interactions with survivors are trauma-informed. This report is very relevant to the forthcoming Strategy on Gender Based Violence.⁸

Focus Ireland advocates strongly for a trauma-informed approach to service provision. Trauma-informed care is part of our organizational strategy, we have an extensive training programme in Trauma-informed practice for all our staff and we have recently appointed a Head of Practice Development to ensure this approach, along with Psychologically Informed Environment and the Housing First principals inform all our work.

⁷ Mayock, P. and Neary, F., (2021) Domestic Violence & Family Homelessness. Focus Ireland. Executive Summary <https://bit.ly/3flwDVO>

⁸ The research demonstrates a strong link between gender-based/domestic violence as a cause of homelessness for women. Combined with rising rents and unstable tenancies in the private rented market, women are increasingly vulnerable to the risk of homelessness. The study highlighted that families are experiencing high levels of residential instability in the private market. The report recommends a unified approach not only at the policy level which Government is already committed to, but also at the local practical level. It calls for a single local agency to be designed at the lead agency, coordinating all responses. The research strongly points to the Local Authorities as the appropriate agency to take on this role, if properly funded.

Appendix

Standards in Emergency Accommodation

The Committee made a number of recommendations in relation to standards in emergency accommodation (Recommendations 5, 10, 11, 12, 13, 14, 15). The Focus Ireland response to homelessness does not involve running mainstream emergency homeless accommodation⁹ so we have little to add to these points.

We can draw to your attention is our research on models of emergency accommodation,¹⁰ showed that families hugely value having their own front door, facilities for cooking and washing, more space and greater stability through a guaranteed minimum period. Many families felt better equipped to build on life-skills and care for their families more effectively, ultimately reducing the trauma that homelessness causes.

You are also concerned about the growth in private for-profit providers of emergency accommodation, and we would bring to your attention our recent edition of 'Focus on Homelessness' which demonstrates the very different patterns of use of private providers across the country.¹¹

⁹ Focus Ireland provides a limited number of specialised supported emergency accommodation services for children in care and young adults and some own-door emergency supported accommodation for families. We also provide case management services for families in privately managed emergency accommodation for families (Family Hubs). Focus Ireland services concentrate on prevention of homelessness and supports to exit homelessness and sustain new tenancies.

¹⁰ Haran, N and S. Ó Siochrú (2020). Exploring Own-Door Models of Emergency Accommodation for Homeless Families in Ireland A Comparative Case Study of Four Models.

¹¹ O'Sullivan, E., Reidy, A. and Allen, M. (2021) Focus on Homelessness: Regional Data from all 9 Regions June 2014 – June 2021. Fig. 8 for each region. <https://bit.ly/FoHAllRegions21>