

SCI Submission on the Department of Housing, Local Government and Heritage's Strategy Statement 2024-2026

Introduction

The Simon Communities of Ireland welcome the opportunity to make a submission to the Department of Housing, Local Government and Heritage Statement of Strategy 2024-2026.

Every member of the Department will be acutely aware that Ireland continues to struggle with a housing and homelessness crisis. We have record levels of homelessness, with latest figures recording an unprecedented 14,303 men, women and children residing in emergency accommodation.¹ We also must better address the issue of hidden homelessness. The Simon Communities of Ireland along with our colleagues in Northern Ireland commissioned a poll which reported approximately 24,000 households experiencing some form of hidden homelessness here.²

The Simon Communities of Ireland have over 50 years' experience in providing homelessness, housing and support services to people facing the trauma of homelessness. This submission provides recommendations for the Department's Strategy Statement through the lens of providing practical policies that can see progress towards ending homelessness.

Recommendations under 'Mission, Values and Goals'

End Homelessness by 2030: As set out in our previous submission to the Department on its Statement of Strategy 2023-2025³, the revision of the Department's Strategy provides an opportunity to set out clearly its commitment to ending homelessness. In June 2021, Ireland signed the Lisbon Declaration, a commitment to work towards ending homelessness by 2030.

¹ Homeless Report – June 2024, Available at: <https://www.gov.ie/en/press-release/b2a49-june-2024-monthly-homeless-report-and-homeless-quarterly-progress-report-quarter-2-2024-published/>

² Under the Radar: Unveiling Hidden Homelessness Across the Island of Ireland, Available at: <https://www.simon.ie/e-publication/under-the-radar-unveiling-hidden-homelessness-across-the-island-of-ireland/>

³ <https://www.simon.ie/e-publication/simon-communities-of-ireland-submission-the-department-of-housing-local-government-and-heritage-statement-of-strategy-2023-2025/>

Despite this commitment, homelessness has increased by a staggering 78% - from a total of 8,014 people in June 2021⁴ to 14,303 people as of June 2023⁵. The Lisbon Declaration acknowledges that homelessness is one of the most extreme forms of social exclusion, negatively impacting on people's physical and mental health, well-being and quality of life, as well as their access to employment and to other economic and social services. To make a meaningful impact on the levels of homelessness across the country, an emergency response is required. Ending homelessness needs to be a top priority for the Government, and this should be reflected and clearly set out in the Departments next Statement of Strategy.

To reaffirm the Department's role and commitment to ending homelessness by 2030, the Simon Communities of Ireland recommend the following addition to 'Our Goals':

- To provide a framework to work towards ending homelessness by 2030 through increased homeless prevention strategies and practices, effective cross-departmental and inter-agency collaboration, and by ensuring access to safe, secure and affordable housing for all.

Recommendations under Strategic Goal A

Strategic Goal A aims to provide a framework that ensures a sustainable housing system in Ireland with a supply of good quality housing to match the needs of all our people.

Since the Department's Statement of Strategy 2023-2025, the Housing Commission published a landmark report.⁶ The Simon Communities of Ireland place particular emphasis on the Commission's recommendations in relation to social housing. The implementation of these recommendations would contribute to increasing social and affordable housing while strengthening the social housing infrastructure in Ireland. This would reduce its susceptibility to pro cyclical output and ensure that estate management and maintenance are adequately funded.

Below are recommendations from the Simon Communities of Ireland for consideration under this Strategic Goal to tackle the ongoing housing and homelessness crisis.

Include overall levels of homelessness as a key indicator and marker of success: We note that the Department's Strategy Statement includes 'cross-departmental agreement

⁴ Homeless Report – June 2021, Available at: <https://www.gov.ie/en/publication/7227a-homeless-report-june-2021/>

⁵ Homeless Report – June 2024, Available at: <https://www.gov.ie/en/publication/feade-homeless-report-june-2024/>

⁶ Report of the Housing Commission, Available at: <https://assets.gov.ie/294018/e1aae1ed-07c4-473d-811e-3426756321ee.pdf>

on the key actions needed to address housing and homelessness challenges’ as an outcome of its first key objective: ‘support the implementation of the *Housing for All* strategy and updated *Action Plan*.’ This is welcome, however there is no specific homelessness indicator set out. The official homeless figures, published by the Department, should be used as a key measure of success in relation to their commitment to address housing and homelessness challenges.

In the interest of evaluating the progress of the Department’s commitment to end homelessness, the Simon Communities of Ireland recommend the following addition to ‘Indicators’ of ‘Key Objective One’ under ‘Strategic Goal A’:

- Overall number of men, women and children residing in emergency accommodation.

Support the Delivery of New-Build Social Homes: We note under Strategic Goal A Objective Two: ‘support the delivery of 50,000 social homes with an emphasis on new builds’, there are again, no indicators directly related to reducing homelessness. Social housing is now the main exit route out of homelessness, as exits to the private rental sector through HAP have fallen significantly. Social housing is also the most secure exit route out of homelessness, with tenants enjoying more higher levels of security of tenure than tenants reliant on HAP.

Both individuals and families are spending completely unacceptable periods of time in emergency accommodation. As of Q2 2024⁷, there were 2,204 single households in emergency accommodation for over a year, 1,039 of whom were residing in emergency accommodation for over 2 years. During the same period, there were 896 family households in emergency accommodation for over a year, 404 of whom were residing in emergency accommodation for over 2 years. This is wholly unacceptable.

To reaffirm the Department’s commitment to ending homelessness, particularly long-term homelessness, the Simon Communities of Ireland recommend the following addition to ‘Indicators’ of ‘Key Objective Two’ under ‘Strategic Goal A’:

- Number of social homes allocated to households living in emergency accommodation.

HAP rates: We note that ‘action 4.2’ under ‘Strategic Goal A’ sets out the Department’s commitment to ‘ensure HAP levels are adequate to support vulnerable households while we increase the supply of social housing.’ This must be restated and actioned under the new strategy. We note that there has been an over-reliance on HAP to provide social

⁷ Homeless Quarterly Progress Report for Q2 2024, Available at: <https://www.gov.ie/en/publication/64abd-homeless-quarterly-progress-report-for-q2-2024/>

housing in recent years, and therefore welcome the move away from HAP towards the provision of more secure and affordable social housing. However, there are still almost 56,000 households reliant on the support. These households need to be protected. Current HAP rates are not in line with prices in the private rental market, resulting in households paying unsustainable top-ups to their landlords.

The Simon Communities of Ireland produce a quarterly *Locked Out of the Market* report that provides a regular snapshot study of the availability of rental homes within standard and discretionary HAP limits. The latest report⁸ found just 43 properties available to rent within HAP limits, representing 4% of the total number of properties available to rent. Just three of these properties were available within standard HAP limits.

For HAP to remain a viable option for low-income households while the current undersupply of social housing is addressed, HAP limits need to be brought in line with market rents. There is a need for rent reviews and maintenance for those currently in HAP tenancies in line with the legal entitlements of landlords to increase rents.

- **Recommendation:** Bring standard HAP rates in line with current market rates. Conduct rent reviews and ensure maintenance of support for those currently in HAP tenancies in line with the legal entitlement of landlords to increase rents.

Enact A Right to Housing: In 2020, through the Programme for Government, a commitment was made to hold a referendum on housing during the lifetime of this Government. This has not taken place and is unlikely to be held before the next General Election. The Housing Commission were tasked with proposing a wording for the referendum that would insert the right to housing into the Irish Constitution. This work has been completed and published.⁹ The Constitution is a statement of fundamental values that people of Ireland believe in. It shapes all Government policy and legislation. Housing is not reflected in these values. This gap has contributed to the ongoing housing and homelessness crisis. The inclusion of a right to housing in our Constitution will place an onus on current and all future Governments to develop and implement policy and practice, which will meet the right to adequate housing for all, and safeguard against future housing crises.

- **Recommendation:** Reaffirm the commitment to hold a referendum on the Right to Housing.

⁸ Locked Out of the Market, June 2024, Available at: <https://www.simon.ie/e-publication/locked-out-of-the-market-june-2024/>

⁹ The Housing Commission Report and proposed wording for an amendment to Bunreacht na hÉireann Constitution of Ireland, Available at: <https://assets.gov.ie/294025/7b5ba258-2dff-44f8-b5d4-df36cbda096a.pdf>

Recommendations under ‘Challenges, Risks and Opportunities’

Housing and homelessness crisis: The ever-worsening housing and homelessness crisis needs to be recognised and listed within challenges, risks and opportunities. Homelessness has increased exponentially for several years now, and this trend is likely to continue in the absence of emergency measures to alleviate the crisis. This major societal challenge needs to be recognised as a key challenge within the upcoming strategy statement.

- Recommendation: Include the housing and homelessness crisis under ‘Challenges, Risks and Opportunities.’

About the Simon Communities of Ireland

The Simon Communities support over 22,000 men, women, and children. We have 50 years of experience providing homeless, housing and treatment services to people facing the trauma and stress of homelessness. We are a network of independent Communities based in Cork, Dublin, Dundalk, Galway, the Midlands, the Mid West, and the Southeast, responding to local needs and supported by a National Office in the areas of policy, research, and communications. We share common values and ethos in tackling homelessness and, informed by our grassroots services, we campaign for more effective policies and legislation regionally, nationally and at European level. Whatever the issue, Simon’s door is always open for as long as we are needed. For more information, please visit www.simon.ie.

Services include:

- Homelessness prevention, tenancy sustainment and resettlement.
- Street outreach, emergency accommodation and harm reduction. • Housing with support and Housing First services.
- Homeless specific health and wellbeing services (counselling; addiction treatment and recovery; and mental health supports).
- Personal development, education, training, and employment services.
- Foodbanks, drop-in centres, and soup runs.