



Pre-Budget Submission to the Department of Social Protection

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1. KEY RECOMMENDATIONS

1.1 Introduction

Threshold is a national housing charity, with regional advice centres in Dublin, Cork and Galway, that provides frontline advice and support services to people with housing problems across the 26 counties of Ireland. Last year Threshold's housing advisors dealt with over 32,000 queries, principally from tenants living in the private rented sector (PRS). Threshold is also engaged in research and policy work, drawing on the experiences of our clients to contribute to meaningful change at national level.

Threshold has helped people living in the private rented sector for almost 40 years and it has never been harder for tenants in receipt of rent supplement (RS) to secure accommodation than it is today. With this in mind Threshold welcomes the recent announcement from the Government's to increase rent supplement limits across rural and urban areas. These substantial increases will work towards alleviating the issues faced by families and households across the country and prevent many from entering homelessness.

However, the way the RS scheme currently operates does not facilitate a smooth relationship between landlord and tenant and is often the cause of difficulties. Significant reform of the administration of rent supplement is needed to address this.

1.2 Summary of Recommendations

We ask the Minister for Social Protection to protect RS tenants, people at risk of homelessness and those seeking to move out of homelessness by implementing the following policy improvements:

Recommendation 1: Maintain rent supplement (RS) limits to reflect current market rents so as to reach a sufficient level to meet the accommodation needs of eligible persons, as set down by legislation.

Recommendation 2: Extend the Tenancy Protection Service (TPS) nationwide.

Recommendation 3: Reform the administration of the RS scheme to reflect the realities of the rental market.

2. Maintaining Rent Supplement Limits

2.1 Changes to Rent Supplement Limits

Threshold welcomes the recent announcement from the Government's measures to increase rent supplement limits across rural and urban areas. These substantial increases will work towards alleviating the issues faced by families and households across the country and prevent many from entering homelessness. Threshold works day in and day out with people facing serious challenges in the private rented sector and these measures will help to ensure that families right across the country secure accommodation and can afford to remain in their homes.

2.2 Maintaining Rent Supplements at an Appropriate Level

The purpose of RS is to provide short term income support to assist with the reasonable accommodation costs of eligible persons living in private rented accommodation who are unable to provide for their accommodation costs from their own resources and who do not have accommodation available to them from another source. RS needs to be maintained at a level so that families who are reliant on RS need are able to pay for their housing needs. This has not happened in the recent past and this has led to the practice of topping up RS payments to bridge the gap between rent limits and the actual rent, placing tenants at increased risk of homelessness.

RS limits need to be maintained at market rates. Previously RS limits were not raised as rents rose due to fears that this would exacerbate rent inflation. It is now widely recognised that RS limits are not the appropriate mechanism to regulate rent levels. Threshold believes that ensuring rents are at affordable level can best be achieved through long-term rent regulation. Threshold recommends that rent increases would in future be linked to the cost of living (CPI), similar to rent certainty measures that exist in most developed European economies.

It is also important to note that the legislative purpose behind the making of supplementary welfare payments in general, and rent supplement payments in particular, is to provide for the payment of a supplement towards the amount of rent payable by a person whose means are insufficient to meet his or her needs (Social Welfare Consolidation Act 2005 ('the 2005 Act'), s.198 (1) – (3)).

In exercising the power to make regulations which prescribe maximum rent supplement limits, the Minister is required to have regard to two matters, namely the family circumstances of the person to whom rent supplement is payable, and the location of the

dwelling concerned (2005 Act, s.198(3E), as inserted by s.14(2)(c) of the Social Welfare (Miscellaneous Provisions) Act 2008).¹

Threshold would argue that, in conducting a review of maximum rent limits, the Minister is constrained by statute to determining the level of rent supplement required to ensure access to accommodation for those whose means are insufficient to meet their needs, having regard to the family circumstances and the location of the accommodation

It is important that regular reviews of rent supplement limits are undertaken to ensure that they don't again fall significantly below market rents, especially in high demand urban areas. This is especially pertinent as it will take a number of years for market forces to moderate rents due to the time it will take to increase the supply of rented accommodation to a more appropriate level.

Recommendation 1: Maintain rent supplement (RS) limits to reflect current market rents so as to reach a sufficient level to meet the accommodation needs of eligible persons, as set down by legislation.

3. Tenancy Protection Service

The most effective way to prevent homelessness is by ensuring that families can remain in their current rented home. For rent supplement (RS) tenants facing unaffordable rent increases, this means providing them with additional financial support. Threshold's highly successful Tenancy Protection Service (TPS) in Dublin and Cork, which is operated on behalf of the local authorities and in partnership with the Department of Social Protection (DSP), provides a targeted response that prevents families from becoming homeless.

The Dublin TPS commenced in June 2014 and the Cork TPS in January 2015. As part of the service, an Interim Tenancy Sustainment Protocol (ITSP) put in place by the DSP allows Threshold to make an application on behalf of clients for a payment in excess of existing RS limits. This payment initially last for 26 weeks (6 months) but may be renewed if the household circumstances have not changed. As of May 2016, the service had helped 5,845 households at risk of homelessness and prevented 3,655 households (including 5,579 children) from becoming homeless.

Threshold's TPS approach is now recognised as the key intervention in preventing homelessness. As a result, the Dublin service was extended to the commuter counties of Kildare, Wicklow and Meath on 25th April and a new Galway service will commence in May

¹ See *McCormack v Minister for Social Protection* [2014] IECH 489 (Unreported, High Court, 30 October 2014), per Baker J at para.20

2016. As the housing and homelessness crisis is a nationwide crisis, Threshold believes that the TPS should be extended nationwide in line with the Draft Programme for Government.

Recommendation 2: Extend the Tenancy Protection Service (TPS) nationwide.

4. Reforming Rent Supplement

Threshold contends that introducing a range of administrative reform measures that in most cases would cost little to introduce, would increase the confidence of landlords in the RS scheme and lead to better outcomes for tenants seeking to secure or remain in RS accommodation. These are summarised as follows:

- ✓ RS limits should be targeted, related to submarkets and more related to individual circumstances. The level of support available to tenants should be less visible to the market.
- ✓ Provide for the automatic payment of RS directly to landlords;
- ✓ Ensure that RS is paid in advance, rather than in arrears;
- ✓ Introduce a pre-approval mechanism for RS claimants who have been assessed by the relevant Local Authority as having a housing need;
- ✓ Review the documentation requirements for RS and provide for direct submission of confidential documents by landlords to Community Welfare Service staff;
- ✓ Restore the face-to-face applications facility in local social welfare offices and ensure that adequate levels of support be given to claimants in completing their application, in order to expedite approval of rent payments to landlords;
- ✓ Ensure that eligible RS recipients are afforded an exceptional needs payment where they require a sum of money for a security deposit, and are unable to make such a payment out of their own means. The rules around how such decisions are made should be clear and consistent;
- ✓ Ensure that RS claimants are given at least 28 days' notice of the suspension or termination of RS payments;
- ✓ Place greater reliance on the local review process in respect of RS decisions, afford priority to appeals relating to RS claims, and ensure that RS continues to be paid while an appeal is pending;
- ✓ Introduce clear guidance for DSP representatives to deal with circumstances where receivers are appointed to properties with RS tenants.

4.1 The setting of Rent Supplement limits

RS limits are currently established for broad geographical areas. This approach doesn't take account of how the Private Rented Sector operates within local markets. New RS limits should be more targeted, related to submarkets within each Local Authority area, and more tailored to individual circumstances. Moreover, the level of support available to tenants

should be less visible to the market and landlords should not be fully aware of the exact level of support available to tenants. **Information about the potential mortgage levels available to prospective buyers is not available to those selling a property. The same principle should apply to the rental market to ensure that information about rent supplement payments available to tenants seeking to rent a property is not available to landlords.**

4.2 Administration of rent supplement

It is Threshold's experience that the RS scheme does not conform to the modern private rented market in terms of the customs and practices that have evolved in the sector. It is also the case that the RS scheme does not take full account of the regulatory framework for the private rented sector established by the Residential Tenancies Act 2004 (RTA). The main changes introduced in the RTA were: a clear statement of landlord and tenant obligations; increased security of tenure for tenants of up to 4 years; compulsory registration of private rented tenancies; and a purpose-built dispute resolution mechanism for landlord and tenant disputes. These changes were an important step forward in regulating the sector and in placing the landlord and tenant relationship on a more business-like footing.

Case Study:

Alison had been living in their rented home property for a number of years. Alison recently became unemployed and was entitled to receive rent supplement. The landlord's agent filled out the relevant rent supplement forms. However, her application was rejected by the Department of Social Protection (DSP), as no PPS number was provided.

At this point Alison contacted Threshold, who engaged with the agent on her behalf. The agent was actually acting on behalf of a Pension Fund, and thus didn't have a PPS number. The Pension Fund had registered with the Residential Tenancies Board (RTB), which accepted the pension fund number for identification purposes and they were thus legally recognised as the landlord by the relevant regulatory body. However, the DSP insisted that a PPS number was needed. Alison had no way of paying her rent without the help of rent supplement and faced homelessness. Thankfully, in this case, Alison found new employment before she faced eviction. However, the broader issue is still relevant, especially with more financial vehicles managing an increasing amount of large rental portfolios.

The way the current supplement scheme is administered is often inconsistent with the rights and obligations set out in the RTA. Landlords and tenants have had to adapt to the changes in the legislation, whereas the RS scheme has retained a model that pre-existed the RTA. **It is a source of some difficulty for landlords and tenants that a state scheme to support tenants in the private rented sector often fails to measure up to the state's own**

regulations for that sector. Taking steps to uphold landlord and tenant law would therefore be an important overarching confidence building measure for landlords.

4.3 Direct payments to landlords

Threshold has welcomed the system of direct payment to landlords under the new HAP scheme as a measure that gives greater security to both tenants and landlords. This has also been welcomed by landlord bodies. The current position whereby RS payments are only made directly to a landlord if the tenant elects for this option remains a source of difficulty. Threshold believes that the security provided by automatic direct payment to landlords and/or their agents is a confidence building measure that should also be extended to the RS scheme.

Normally RS will be made directly to a tenant, but he or she can voluntarily nominate a third party such as a landlord or agent to receive this payment directly by making a declaration on the relevant application form (SWA RS 1). Recent figures from the DSP indicate that only in some 20% of cases will a RS recipient nominate an agent or landlord to receive direct payments.² While this figure shows that a proportion of claimants nominate a landlord or his or her agent to receive direct payments, tenants may subsequently choose to opt out of this arrangement without reference to the wishes of the landlord.

The payment of RS to tenants rather than directly to landlords can result in delays in paying the rent over to landlords. The tenant may delay making payment to the landlord for their own financial reasons and, in some cases, it may not be passed on at all. From a landlord's perspective, it is far more convenient to have the full payment deposited into their bank account on the same date every month, rather than having to collect the RS payment and the tenant's contribution separately. As most landlords are not full-time landlords but rather are employed in other sectors, it is an inconvenience to have to call to the property to collect the rent.

With over 27,891 buy-to-let mortgages (20 per cent of total) in arrears³ and many landlords struggling to make repayments, the unpredictability of RS payments can have serious consequences for the landlord's financial position. In many cases, the landlord (possibly on the advice of the financial institution that holds the landlord's mortgage) may refuse to accept RS due to uncertainty around the payment. **The level of payment may be a concern but the predictability of payments is also important to landlords.**

Delays in RS payments are often not due to the actions of the tenant, but rather caused by administrative delays in the processing of payments (for example, it is not unusual for delays to occur in transferring cheques to local welfare offices on months with public holidays). If

² DSP, [Fraud and Error Survey Report](#), July 2014, page 6.

³ [Residential Mortgage Arrears and Repossessions Statistics: Q.4 2014](#), Central Bank of Ireland, March 2016

salary payments can be made on time, then there is no reason why welfare payments should be delayed in this way. This would be greatly facilitated by direct payment.

4.5 Payment in arrears

The market norm in the private rented sector is that rent is paid in advance. When faced with two potential tenants at the outset of tenancy - one who can pay a deposit and month's rent in advance and one who cannot make a payment until later - the vast majority of landlords will accept a tenant who can pay upfront. The payment of the supplement in arrears therefore puts tenants at a distinct disadvantage when it comes to securing a property.

The payment of RS in advance would ensure that landlords would be more open to accepting RS tenants on the same basis as other tenants in the mainstream rented market. In Threshold's experience, a landlord may have to wait for many weeks before receiving a first RS payment. Payment in arrears, together with delayed approval, means that landlords are less likely to accept welfare dependent tenants when there are plenty of other tenants in the market.

In the current constrained market where there are far more prospective tenants than properties, many landlords who would have previously accepted RS payments have moved out of this segment of the market. This is unlike the situation in 2008 and 2009, when there was an oversupply of rented properties and landlords faced a possible vacancy if they refused to accept a RS tenant. Under those circumstances, a landlord was satisfied to have a tenant underwritten by the State. The DSP must recognise the realities of this changed market and make RS tenants a more attractive proposition for landlords. Threshold therefore recommends that RS be paid in advance.

4.6 Pre-approval

The DSP states that it has no involvement in the landlord and tenant relationship. Any breach by the tenant of his/her obligations is therefore at the expense of the landlord. Under these circumstances, landlords consider it crucial to thoroughly screen any potential RS tenant before they move in. One of the proofs often sought by landlords is of the tenant's ability to pay the rent. Tenants in receipt of rent supplement are generally not in a position to provide landlords with this assurance because of the way the scheme is currently administered. Pre-approval of RS payments would considerably help to overcome this barrier.

The main criterion for eligibility for RS is that the applicant has been assessed as having a housing need by the relevant housing authority. Once approved, RS payments are fixed at a particular price point in the market by RS limits. The maximum available amount under the RS limit depends on the household size and on the geographical area. There is therefore no

reason why RS approval should be withheld until a tenant has been accepted by a particular landlord and why a tenant could not receive 'approval in principle' before searching for a property. This would increase the confidence of landlords who are approached by prospective RS tenants and it would potentially open up a wider range of properties to RS tenants.

In the current market, it is critical that RS applicants are in a position to view suitable properties and enter into tenancy agreements with prospective landlords. The tenant should be in the position to reassure the landlord that RS payments will be made from the beginning of the tenancy and not from a later date when their RS application is approved. The current failure to backdate many approvals means that some tenants who succeed in securing RS may get off to a bad start with the landlord by accumulating arrears which they find difficult to repay.

Pre-approval could take the form of a letter from the DSP confirming that the individual concerned is eligible for the payment of RS at the appropriate amount, based on their household size and the relevant supplement limit for the geographical area.

4.7 Documentation requirements

A considerable disincentive to landlords is the amount of documentation that they are required to supply to the DSP in order for the tenant to secure approval for RS. Many landlords refuse RS on the basis that it is simply too bureaucratic.

In the mainstream market, a landlord would rarely be required to provide any of the documentation requested by the DSP and a landlord would be unlikely to furnish the information. Many landlords are reluctant to provide confidential information directly to the tenant and cannot understand why the Community Welfare Service (CWS) refuses to engage with them over the phone or by email when they have a query.

Case Study

Chris is a lone parent who has joint custody of his son. He is in receipt of rent supplement. Chris's son recently became 18, but is still in school. Chris was informed that he was now being treated as a single person in terms of his rent supplement payments and would thus need to find alternative accommodation as his existing home was above the rent supplement limit for a single person. Alternatively, he would have to share the house with a new tenant.

When Chris looked for new accommodation within his reduced rent supplement limit there was none available that could accommodate his son. Either option that he was given meant that his son could no longer stay with him. Chris's son was preparing for his exams at this time.

Threshold has a major concern with regard to the requirement that landlords must provide a tenant with a current lease/tenancy agreement as 'bona fide' proof that a tenancy exists. The existence of a tenancy is not contingent upon the existence of a written lease or tenancy agreement. The RTA expressly provides that a 'tenancy' includes agreements which are written, oral, or implied, and there is no requirement for a tenant to enter into a written lease or tenancy agreement in the private rented sector. Notwithstanding, the CWS insists on seeking copies of lease or tenancy agreements.

Threshold frequently assists clients who have been compelled to enter into a lease or tenancy agreement which is not in the best interests of the landlord or tenant, as there is no guarantee that RS will be paid for the period of the lease. It makes no sense that a tenant would be required to make a legally binding promise to pay rent, typically for a 12 month period, without having the means to do so. Landlords are understandably reluctant to enter into lease agreements in circumstances where there is a high risk of arrears or, in the case of non-approval, a risk that they may receive no rent at all.

One of the most aggravating features of the administration of RS scheme over the period of the economic downturn was that, on the one hand, landlords were compelled by the CWS to enter into lease or tenancy agreements with tenants, and on the other hand, they were asked to reduce the agreed rent when RS limits were reduced in a series of reductions over the period 2010 – 2012. Over this period, the CWS did not respect the legal agreements it insisted upon when tenants applied for RS. This practice seriously undermined landlords' confidence in the scheme.

The requirement to seek proof of ownership of the property from the landlord puts RS tenants at a distinct disadvantage, as it is not required by any other tenant who wishes to enter a tenancy. The provision of this information is regarded as an intrusion by many landlords and they will often refuse to give this information to a prospective tenant.

Further, the requirement of proof of ownership by the landlord as a precondition for the payment of RS is incompatible with the general requirements of landlord and tenant law. All leases are subject to an implied term that the landlord has good title to make such a lease. Moreover, tenants are expressly precluded from disputing their landlord's title in the context of a dispute before the Residential Tenancies Board (RTB), and in all other proceedings they are precluded from disputing their landlord's title to grant the tenancy. In the circumstances, the requirement that a landlord provide proof of ownership of the property is disproportionate.

With regard to the nature of the documents requested, it is also the case that landlords are requested to supply information that is often difficult or even impossible to provide at the outset of a tenancy. For example, a tenancy does not have to be registered with the RTB until one month after the tenancy is formed. Proof of RTB registration therefore cannot always be provided in advance to the CWS, although this is often sought.

In general, there is a lack of consistency as to which documents may be required of applicants. Often applicants inadvertently fail to furnish a necessary document and are required to resubmit their application, resulting in significant delays. On occasion documents previously submitted are lost. The introduction of central rent units has resulted in longer delays, as the lack of face-to-face interaction with CWS staff means that there may be a lag time before the tenant becomes aware that their application is incomplete. The impact on landlords is that payment is delayed, even where the document concerned is of relatively minor importance.

Threshold recommends that the DSP both reviews and streamlines the documentation requirements for the RS scheme, based on the legislative requirements of the RTA. The CWS should be open and willing to receiving documents directly from landlords and to engage with them where they have a query that they do not wish to communicate via the tenant. Processing times should reflect the realities of the market and landlords who accept RS tenants should not be at a disadvantage when it comes to receiving prompt payment.

With regard to proof of tenancy, Threshold recommends that deciding officers be permitted to accept a letter from a landlord confirming the address of the dwelling and the terms of the tenancy and/or confirmation of registration of the tenancy with the Residential Tenancies Board as evidence of a tenancy agreement, where it is an existing tenancy.

4.8 Deposits

It is a widespread practice in the private rented sector that landlords require the payment of a deposit, usually equivalent to a month's rent, as a condition for entering into a tenancy. This is a practical requirement that provides the landlord with security in the case of the non-payment of rent (and other charges), and damage to the property beyond normal wear and tear.

A landlord is most unlikely to accept a tenant who is unable to provide a deposit in advance. Many tenants do not have the funds for a security deposit before they enter a tenancy and they seek the assistance of the CWS by means of an exceptional needs payment. The refusal of exceptional needs payments for deposits means that landlords are less willing to consider a RS tenant who says that they will pay the deposit once it is approved by the CWS.

Under the Social Welfare Consolidation Act 2005, a deciding officer may determine that a supplementary welfare allowance should be paid by way of a single payment to meet an exceptional need. While an exceptional needs payment is a single payment, this clearly does not preclude repeated once off payments where this is necessary to securing the wellbeing of the recipient, and in particular where all or part of a deposit paid with the assistance of an exceptional needs payment has been withheld by a previous landlord.

In Threshold's experience tenants often face difficulties in securing such payments. The current rules are unclear as to when approval is likely to be provided and a tenant who is

taking up a second tenancy is unlikely to be successful. Landlords are therefore not willing to take the risk that the tenant will be approved for a deposit payment.

4.9 Review, suspension, termination

Threshold is frequently contacted by individuals whose RS payments have been suspended or withdrawn in the context of a review of their claim. Clearly the DSP has a legitimate interest in regularly reviewing RS claims, but stopping payment to landlords without prior warning has serious consequences for both landlords and tenants. The current review process lacks transparency, as there is insufficient information as to the manner in which reviews are carried out and a lack of consistency as to the requirements made of RS recipients.

Case Study:

Christine has been living in her rented home for 2 years. She works part time and is in receipt of rent supplement. Christine's landlord fell into financial difficulty and the property was taken over by a receiver. When this happened Christine's rent supplement was abruptly stopped and she fell into arrears and was issued with an eviction notice. The DSP requested new documents from Christine, including a new lease agreement from the receivers, even though they are under no legal obligation to do so, before she could receive rent supplement. Furthermore, the receivers refused to maintain the property while she was in arrears and it became very difficult to live in. Christine faced the real prospect of becoming homeless as she could find no alternative accommodation within rent supplement limits.

Threshold deals with many people in similar situations, who are put at risk of losing their homes, or actually end up losing their homes, because the administration of rent supplement doesn't comply with landlord tenancy law.

Tenants and landlords are often told that the payment will cease if documents are not supplied within a short period of time. Threshold would stress that the unilateral cessation of RS has grave consequences, resulting in a deterioration of the landlord and tenant relationship. The likely impact on the landlord is the loss of income due to arrears of rent. The CWS must recognise that a payment should be stopped only in the most extreme circumstances and it should not be a threat that is applied to both landlord and tenant during the regular review process.

In this respect, Threshold notes with concern that the relevant review form (SWA 3A) provides that failure to return the form fully complete may result in payment being suspended or withdrawn 'without notice'. In circumstances where there is a dispute between the landlord and the tenant, it may be impossible for the landlord or his/her agent to sign the declaration required by the review form. The legislation governing the landlord

and tenant relationship is based on proper notice being provided in writing (in particular where rent is being reviewed, or the tenancy is being terminated) and the current approach does not take account of the landlord's legal entitlement to notice even where the payment is being withdrawn. A tenant's failure to provide proper notice to the landlord may give rise to a dispute before the RTB and result in an award of damages against the tenant.

4.10 Appeals

Delays encountered in progressing appeals in respect of decisions relating to RS, coupled with the suspension of payments while an appeal is pending, have a serious impact on landlords and tenants.

The most recent information available from the Social Welfare Appeals Office indicates that of the 2,330 appeals relating to supplementary welfare allowance lodged in 2015, some 1,084 (47%) either resulted in a revised deciding officer decision, or in the allowing or partial allowing of the appeal. This was an increase in the proportion of changed decisions compared to 2014.⁴

These figures reveal a significant rate of error on the part of deciding officers in relation to supplementary welfare claims, including claims for RS. The impact of these decisions is that tenants are unfairly deprived of payments and landlords do not receive the rent to which they are entitled. Even where a claimant succeeds in appealing an unfavourable RS decision, this will often be too late for the landlord who may be forced to terminate the tenancy due to the accumulation of rent arrears over many months. The payment of rent to landlords while appeals are being heard would be a confidence building measure.

While delays inevitably arise from a formal appeal of a decision relating to RS, in Threshold's view greater reliance should be placed on the informal review process, whereby the decision in question may be reviewed locally by a more senior person such as a DSP Manager/Assistant Principal Officer. Where a review is successful this will result in the resumption of RS payments without undue delay and will minimise the risk of arrears of rent accruing for landlords.

Under the RTA a tenancy remains in place where a dispute between landlord and tenant is being decided by the RTB. The same principle should apply to social welfare appeals, with the payment continuing to the landlord until such time as the appeal is decided. It is suggested that, in the event that an appeal is unsuccessful, the payments which have been made in the interim period may be deducted in a proportionate manner from any other payments being made to the claimant concerned.

4.11 Appointment of Receivers

⁴ Social Welfare Appeals Office, [Annual Report](#) 2015, p.22

The appointment of receivers in respect of mortgaged properties can undermine the administration of the RS scheme. As already noted there are currently 27,891 buy-to-let mortgages in arrears⁵ with rent receivers in place in respect of 5,682 buy-to-let properties by the end of December 2015.⁶

The lack of clarity around receiver appointments in terms of the RS scheme can mean that tenants not only have to face competing and sometimes aggressive demands from both the receiver and the former landlord, but also deal with uncertainty as to whether they will continue to receive RS as the receivership process proceeds.

Recommendation 3: Reform the administration of the RS scheme to reflect the realities of the rental market.

Conclusion

Threshold welcomes the opportunity to make this submission to the Department of Social Protection in advance of Budget 2017.

The private rented crisis that began with a shortage of rented accommodation in Dublin is now spreading to other urban centres and to the commuter counties. Given the lack of new housing supply, the upward pressure on rents will continue for the foreseeable future.

In order to protect tenants and to prevent a continued rise in homelessness, it is critical that all RS claimants can secure a payment that reflects actual market rents. While welcoming recent increases in rent supplement limits it is important these increases are maintained at market levels.

In addition, the way the RS scheme operates must be both responsive and flexible enough to provide greater security for tenants and to increase the confidence of landlords who are letting properties to RS tenants.



⁵ [Residential Mortgage Arrears and Repossessions Statistics: Q.1 2016](#), Central Bank of Ireland, June 2016

⁶ [Residential Mortgage Arrears and Repossessions Statistics: Q.1 2016](#), Central Bank of Ireland, June 2016