



Examining Local Authority Housing Waiting Lists

A Submission to the Joint Oireachtas
Committee on Housing, Planning and Local Government.

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Threshold, the National Housing Charity, welcome the opportunity to present to the Committee on the issue of Local Authority Housing Waiting Lists. As a service provider and advocate for renters, we seek equality of outcome in any future system of Local Authority.

Housing Waiting Lists.

The root of the current pressure regarding Local Authority Housing Waiting Lists relates to the unyielding issue of lack of supply and insecurities within the private rented sector.

The allocation of such a scarce resource is an important issue for Threshold given the number of households in the Private Rented Sector who are on Local Authority Housing Waiting Lists, the length of time on such lists due to the lack of supply, and the various pressures on and created by the Private Rented Sector (PRS).

It has been the case for some time that single people have been discriminated against with regard to access to Local Authority housing. While the Private Rented Sector may be an option for many, the level of security of tenure for tenants is not remotely close to that of the social housing system (Local Authorities or Approved Housing Bodies).

The Local Authority Housing Waiting List system is undermined by the fact that Local Authority construction, vacancies and acquisition are predominantly of three and four bedroom houses, yet single person households make up a huge proportion of all households on the waiting list. The available housing not only fails to meet need in general supply, but also does not reflect the population characteristics of the waiting list and the diversity of household types, with an aging population and increasing numbers of smaller household units. Therefore, there needs to be a better balance in construction and acquisition to reflect the nature of the list itself.

Of particular interest to Threshold is the level of priority given to the transfer list which impacts on HAP, and the issue of responding to hidden homelessness, much of it caused by, and / or existing within, the PRS. There is much debate on the new scheme of lettings for DCC which changes somewhat the priority given to those in homeless services. Many of our clients are arguably in worse positions than certain households in emergency accommodation and are in effect homeless, so the work by DCC in this area is very significant.

We believe that people in the private rented sector on HAP and who are on the list by virtue of the 'transfer' list have a right to seek a Local Authority tenancy as they are on a different tenancy. Until a person has a secure legal tenancy, their situation is in some respects insecure due to the lack of security of tenure in a HAP tenancy. Clients are reluctant to take up HAP due to the loss of securing any permanent roof over their heads.

It is important to acknowledge also that discussion around Local Authority Housing Waiting Lists access is a highly gendered issue. Recent public comments essentially referred to female headed lone parent households with children. The transmission to the list of single parent households is more visible than e.g. female with no child dependent – so much of the discussion alludes to families accessing social housing through emergency accommodation. A little under half of those on the waiting list are single-person households.

People should have greater choice of tenure, yet many have no choice but to reside in the PRS. While we welcome the differential rent scheme included in HAP, and the recent legislative improvements in security of tenure, there is still much stronger security of tenure when housed by the Local Authorities and Approved Housing Body sectors.

1. What are the exact structures and processes in place currently with regard to local authority housing waiting lists?

When it comes to completing the housing needs assessment form our advisors have extensive experience in this process. However once households get approved for a housing list, the advice is, essentially, to find a house using HAP - with no real prospect of getting a local authority house, in the short to medium term. This directly links to question 9 on transparency, which does not appear to exist.

The waiting list system doesn't work in the way it should as there is no unified electronic system across all local authorities and no national standard in the methodology of assessing housing need and the scheme of letting priorities. There are 31 Local Authorities, each with a unique differential rent scheme driven by different policy outcomes (household incomes versus a costs based approach for the Local Authority) and similarly there are different approaches to the local authority waiting lists between councils. Judgements are made on a paper based estimation where complex needs and issues are reduced to numeric calculations.

Local Authorities each have their 'Scheme of Lettings' which outline how they make allocations. There is no uniform system in place and there are different schemes in place across the country. The Scheme of Lettings outlines how the Local Authority determines how it gives priority to social housing applicants. The Scheme of Lettings also includes the Local Authority policy on refusals, transfers, succession tenancies, and downsizing for older people. There is a need for accountability and mechanisms for the overall housing system, developing practices according to policy, frameworks, standards and governance clauses. There also is a need for greater consistency and training for Local Authority staff in the area.

When an individual is accommodated through HAP they are taken off the main housing waiting list, but then placed on a transfer list. The transfer list then operates in parallel to the main housing waiting list. We welcome DCC's attempts to rebalance the transfer list to make more allocations from that list.

The majority of people apply for a housing needs assessment in order to access HAP. Amongst many tenants there is no expectation that they will ever actually be allocated local authority housing.

2. Are the structures currently in place, sufficient and operating at as effectively and efficiently as possible?

From a tenant's perspective this does not appear to be the case. Why and how one gets chosen for any given property is not clear to any of the tenants that we work with. The perception of some households on the lists is that they are a continuous and regular bureaucratic imposition for no reward, given the amount of time spent on the list with little prospect of being housed. DCC lost over 5,000 households from the list at the last review.

Many families did not reapply as they believed that there was no point; that there was little to no prospect of receiving an offer of a house and they are in effect permanently excluded, with perhaps the only prospect being that once they are old enough on the list to access a senior citizen's housing unit. There is almost permanent exclusion of single people under 60 years and therefore there is a clear lack of equity in the system nationally.

3. Are there any problems, bottlenecks or areas in need of improvement with the structures and processes currently in place?

Time on a list is the fairest way of allocating housing, and is an attempt at openness and transparency. At the same time the list needs to be flexible enough to recognise changed conditions in a household. We are very aware of and concerned about people living in overcrowded situations in shared situations or with family.

The Housing needs assessment form needs to be processed more quickly. On average it can take 6 weeks with certain local authorities. Where we have a contact in the assessment office of a local authority, when we send a housing needs assessment form to this person it can be done in 24 hours. The waiting times are longer with local authorities without such a contact. This then directly leads to longer waiting times to get HAP approved.

Delays in processing Housing Needs Assessments can lead to a tenant missing out on a HAP tenancy. Accessing the housing waiting list can be challenging for some and there can be quite a narrow interpretation of the rules in relation to, for example, local connection. Income thresholds are an issue in some areas. For example, we see many people living in Galway County applying to Galway City because there is a higher income Threshold.

More generally, the income thresholds that are in place currently need to be updated. A growing number of people are excluded from applying for HAP because they do not qualify for the social housing support because their earnings are over the income limits.

In Housing Law, Rights and Policy by Padraic Kenna, he states:

“There is a widespread assumption (whether justified or not) that the allocation of Local Authority housing has been part of the local political patronage or clientelist network of Ireland. The absence of a national, transparent accessible and objective system of managing waiting lists and allocating homes has fuelled this view” (p.744).

Going to your local elected representative is probably something many social housing applicants have done in an effort to get social housing. This system still pervades and many of our current

clients view this as a natural part of the process to access social housing (as, indeed, do the elected officials.)

The new Choice Based Lettings (CBL) system, while a positive step in principle, has complicated the notion of waiting lists. This has changed the dynamic of the allocation system and places the initiative on applicants on the Social Housing Support waiting list to express interest online in CBL dwellings advertised. If applicants do not express an interest in a property or the properties advertised, they will not be considered for them. Those who then express an interest in particular properties are still prioritised as per the Scheme of Lettings.

4. What if any, improvements can be made?

A national policy on allocation should be developed and implemented. Applicants could be given a clear outline of how allocations take place. For example, a score sheet could include points for time on the list – which we view as the fairest criteria - and special considerations such as medical needs or other circumstances. At least this would give tenants some knowledge and reduce the feelings of powerlessness that we hear about.

The introduction of Choice Based Lettings across all local authority areas would be a welcome development. However, we would caution that while CBL works for those who have access to and can use basic IT systems, it does not however work for some older clients or those who do not have access to IT. Threshold are aware of cases like this. Tim Brown, Director of the Centre for Comparative Housing Research at De Montfort University, has made the point:

CBL has to be integrated with housing advice and support services. Without this close relationship, housing waiting lists will soar as households bid for properties without any realistic chance of being rehoused in those homes. There must also be a commitment to equity and fairness in providing information to people so that they can make informed decisions. Reliance exclusively on IT to deliver the new system will create a digital divide and worsen social exclusion.

5. Are there any examples of best practice in the area?

Develop Housing Options with housing advice and support services as part of homelessness prevention work and wider housing services.

6. Are there any local authorities with any innovative practices?

DRHE uses the ETHOS typology of housing assessment. ETHOS is a broad definition of homelessness and housing exclusion and includes households who are roofless (e.g. rough sleeping); houseless (e.g. in emergency accommodation); living in insecure housing (e.g. threatened with tenancy termination) and inadequate housing (e.g. overcrowding). If a person's housing circumstances are so poor, say due to overcrowding and sleeping on a friend's or family member's floor, they are in effect homeless, and arguably more poorly catered for than someone in emergency accommodation in a hotel room.

7. How does Ireland compare with other countries in relation to the average time spent on waiting lists?

The social housing system in every individual country is unique, which makes it extremely difficult – and potentially misleading - to compare list between countries.

8. What is the average waiting time when placed on a housing waiting list?

Clients regularly report very long waiting times but this will change from place to place. In Galway, for example, most people have been on the list of 10+ years. Some people who we encounter will have been on the list for up to 14 years. The majority of allocations, understandably, go to those with particular housing needs.

According to the Rebuilding Ireland document Summary of Social Housing Assessments 2017, in 2017 there were 85,799 households assessed as qualifying for social housing support. This is a decrease of 6.3% from 91,600 in 2016 and 89,872 in 2013.

- 48% households between 25 and 39.
- 22% employed
- 44% single person households
- 50% on list dependent on rent supplement
- 24% living with parents/family/friends
- 40% on list more than 5 years. Almost a quarter of the 85,799 households qualified for support have been waiting more than seven years.
- 72% are Irish, with the main applicant from an EU/EAA country in the majority of the remainder.

9. Is the operation of the housing waiting lists transparent?

From our experience the waiting lists are not transparent.

