

# **Submission to Review of *Homelessness – An Integrated Strategy***

**From:**

**Threshold – national housing organisation**

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## **Introduction**

Threshold welcomes this opportunity to participate in the independent review of Homelessness – An Integrated *Strategy* (HAIS). Government investment in the strategy since 2000 has produced impressive results particularly in the area of emergency provision for people who are homeless. Threshold sees the main challenges for the strategy going forward as homelessness prevention and the provision of longer-term housing solutions. Strong government investment will also be needed in these areas to achieve similarly positive outcomes in the future.

This submission makes a number of recommendations and comments to inform the future development of the national homelessness strategy. The first section provides information about Threshold and its priorities. The second section sets out what Threshold considers to have been the successes of HAIS to date as well as the outstanding issues that remain to be addressed. The third and fourth sections make detailed comments on the key areas of homelessness that concern the work of Threshold, under the headings of homelessness prevention and longer-term solutions to homelessness.

### **1 Threshold - national housing organisation**

Threshold, a nationally based housing organisation established over 25 years ago, has worked on all aspects of the housing system in Ireland. Although founded as an organisation dealing with the private rented sector, Threshold has extended its areas of concern to include social housing, housing legislation and housing rights and increasingly in the area of homelessness.

Threshold is involved in both preventing and delivering longer-term solutions to homelessness. Regional centres in Cork, Dublin and Galway provide expert information, advice and advocacy to tenants and landlords in the private rented sector. Threshold helped over 20,000 people last year, many of whom were at risk of homelessness, by among other actions challenging threats of eviction, helping people to recover rent deposits and demanding improvements for people in poor living conditions.

The Access Housing Unit is a unique placement service delivered by Threshold and funded by the Homeless Agency that assists people who experience homelessness to move into private rented accommodation. In 2004, the AHU assisted 127 people out of emergency accommodation and into the private rented sector.

Through its Research Unit, campaigns and educational programmes, Threshold has contributed significantly to the evolution of housing and homelessness policy and legislation and to the understanding of the role and significance of housing in Ireland. For example, Threshold was involved in a joint research project 'Housing Access for All' (with the Simon Communities of Ireland, Focus Ireland and the Society of Saint Vincent de Paul) that analysed housing strategies and homeless

action plans around the country. Threshold was also involved in a joint submission on homelessness to the National Action on Plan Social Inclusion 2003-2005.

## **2 Overview of HAIS: Outcomes and Outstanding Issues**

This section briefly reviews the successful outcomes and outstanding issues remaining to be addressed by the national homelessness strategy:

### ***Reduction in Rough Sleepers***

The single biggest success emerging from the implementation of HAIS and the first Homeless Action Plan for Dublin 'Shaping the Future' has been the marked reduction in the number of rough sleepers (for example, from 312 regular rough sleepers in Dublin in March 2002 to less than a hundred in 2005). The resourcing of outreach teams and the provision of additional emergency beds has helped services to move people from the streets into emergency accommodation.

### ***Provision of Emergency Accommodation***

Most service providers agree there are sufficient emergency beds in the Greater Dublin Area to accommodate all those who need shelter. This has considerably helped with addressing the problem of street homelessness. However, the long-term efficiency of using private providers (so called 'B&Bs') as a means of supplying additional emergency is questionable and unsustainable. Threshold considers that monies invested in this area would be better spent on the provision of additional social housing units or augmenting initiatives like Threshold's Access Housing Unit.

### ***Increased Integration and Co-ordination of Services***

The Homeless Agency has been largely successful in bring together statutory and voluntary homeless service providers in an integrated and co-ordinated way to work towards achieving the goals set out in 'Shaping the Future'.

The establishment of homeless fora, comprising of representatives of the local authority, health board and the voluntary sector, has been achieved in every county and is a welcome development. The fora have provided a useful space for the exchange of information and views. However, the terms of reference of the fora must be extended to give more responsibility around monitoring the implementation of local Homeless Action Plans. Accountability and reporting structures need to be established to ensure that the fora are carrying out their remit. Thresholds is aware that some Homeless Fora have not been meeting on a regular basis.

Health Board action plans have been developed in most regions and Health Boards have been engaging in homeless fora. Protocols have been drafted for the discharge of homeless persons from hospitals and mental health facilities and young people leaving care. However, the level of implementation of these protocols is unclear.

The following issues remain to be addressed:

### ***Local Homeless Action Plans***

The local Homeless Action Plans should be put on a statutory basis in order to ensure their timely delivery. It should be a requirement of the Homeless Action Plans that they set specific housing targets and monitoring mechanisms be put in place to ensure these targets are actually met. Housing targets set out in Homeless Actions Plans should then be incorporated into other relevant strategies, i.e. Housing Action Plans, Social and Affordable Housing Strategies. The Social and Affordable Housing Strategies should be reviewed in light of the March 2005 needs assessment and funding revised accordingly.

### ***Funding***

A fully costed analysis of delivering the current commitments in each of the action plans must be undertaken. This must be based on reasonable funding levels where they have been agreed. Government should then publicly commit to allocating these funds and release additional earmarked resources to the relevant Government Departments to ensure the commitment is delivered.

Although the level of resources provided has been high, the promise of multi-annual funding for homeless service providers has not been delivered and this has hampered the planning and delivering of services going forward. A consistent, transparent, coherent and flexible funding system for voluntary organisations must be developed. This should include, as originally stated in the Integrated Strategy, fully funded care costs, and the standardisation of payment rates throughout the country. Also there should be clear nationally agreed funding mechanisms for settlement and sustainment services.

## **Recommendations on Homelessness Infrastructure and Resources:**

- **Monies invested in the provision of private emergency accommodation should be redirected to the provision of additional social housing units and augmenting initiatives like Threshold's Access Housing Unit.**
- **Local Homeless Action Plans should be put on a statutory basis in order to ensure their timely delivery. It should be a requirement of the Homeless Action Plans that they set specific housing targets and monitoring mechanisms should be put in place to ensure these targets are actually met.**

- **Housing targets set out in Homeless Actions Plans should then be incorporated into other relevant strategies (including Housing Strategies and Social and Affordable Housing Strategies)**
- **A system of multi-annual funding for voluntary organisations must be developed. This should include fully funded care costs, and the standardisation of payment rates throughout the country.**
- **There should be clear nationally agreed funding mechanisms for settlement and tenancy sustainment services.**
- **Accountability and reporting structures need to be established for Homeless Fora around the country to ensure that they are carrying out their remit.**

### **3 Longer-Term Solutions to Homelessness**

Threshold considers that the following issues and areas need to be addressed as longer-term solutions to homelessness.

#### ***Social Housing***

The lack of provision of social housing, particularly for single people, is now the greatest barrier for people moving out of homelessness. Four out of every five people who are homeless are single people, yet this group faces the greatest difficulties in accessing social housing. While much progress has been made in moving people off the streets and into emergency accommodation, much more needs to be done help to people in emergency accommodation to secure longer-term housing. Single people, and single men in particular, face a number of obstacles.

The prioritisation of families and children for local authority accommodation is not of itself a barrier, but the overall scarcity of social housing means that single men rarely reach the top of the list for housing. Also the lack of appropriate accommodation for single people means that there is a mismatch between housing need and the available housing stock. The lack of ringfenced move-on accommodation for homeless people in transitional accommodation means that this form of accommodation, in addition to emergency accommodation, is often blocked with single people who have no permanent housing options.

The recently published National and Economic Social Council report 'Housing in Ireland: Performance and Policy' recommends that 73,000 social housing units be provided in the state between 2005 and 2012. This would constitute a doubling of existing social housing output from 5,000 in 2004 to 10,000 units in 2005 and beyond. The government should adopt NESC's recommendation on social housing output as a matter of urgency.

The reviewed HAIS must also look at the provision of a guaranteed, ringfenced number of move-on places for people coming out of homeless services in each local authority area.

### ***Access Housing Unit (AHU)***

Threshold's Access Housing Unit (AHU) was established to increase the availability of longer-term housing options, particularly for single people. The AHU works by taking referrals of potential tenants from other homeless service providers, including Focus Ireland, Dublin Simon Community and Merchant's Quay Ireland, and helping them to move into private rented accommodation. The Unit is operated by Threshold on behalf of the Homeless Agency.

Last year, the AHU helped 127 people to move out of homelessness. Only five tenancies were unsuccessful in 2004. This represents an unprecedented success for a project of this type and creates a solid foundation for the future. Threshold operates a similar but less formalised service in Cork due to a lack of funding.

Threshold strongly recommends that the Access Housing Unit be replicated in every local authority area in the country. The AHU in Dublin should be augmented to address the specific needs of people leaving prison, unaccompanied minors, people leaving psychiatric institutions, young people leaving care (including institutions & foster care) and families and individuals in private emergency accommodation.

A key obstacle to the work of the AHU is the cap on rent supplement. In 2004, the AHU conducted four surveys involving 544 landlords that found the average cost of a bedsit in Dublin was €121, whereas the maximum allowable rent cap in Dublin is €115. It is very difficult to find single accommodation at this price.

Homeless sector studies have shown that it costs about €20,000 per annum to maintain someone in the homeless sector. Even if the rent cap was raised to €130, the annual cost would be only €6,760. The state still saves money and homeless people have an opportunity to become part of mainstream society and have a chance to fulfil their potential.

Threshold's survey of rent supplement recipients in Cork reveals significant numbers of people paying 'top-ups' to landlords from their social welfare payments to keep their rented accommodation, forcing them to forgo other basic

necessities.<sup>1</sup> Others said that they had to accept accommodation that was sub-standard. People in these circumstances are particularly vulnerable to homelessness.

Rent caps must be increased to reflect the real cost of renting. Rent caps should be used not restrict people who are homeless moving out of emergency accommodation and into the private rented sector through placement services such as Threshold's Access Housing Unit. This flexibility already exists but does not always happen in practice, and should be made explicit as part of the Government's commitment to combat homelessness.

### ***Tenancy Sustainment***

Tenancy sustainment is a service which interacts with a newly accommodated homeless person to help them maintain their tenancy. Threshold's Access Housing Unit has developed its own tenancy sustainment service, which involves visiting people in their own home and helping them to acquire the confidence and skills to maintain their tenancy. Home visits also help the AHU to know if a person is coping. A worker can check if the person knows how all the appliances work, if there is food in the fridge and that bills are not lying around unpaid.

There are a number of homeless people who are capable of sustaining their tenancy with this kind of help. Half of the referrals that come to Threshold's Access Housing Unit are from organisations that don't have access to tenancy sustainment, but provide an *ad hoc* version to fulfil the AHU's referral criteria. A more structured approach is needed with regard to the delivery of tenancy sustainment services and their resourcing. This should be incorporated as a key priority in the reviewed HAIS.

### ***Rental Accommodation Scheme***

On 7th July 2004, the Government announced a new scheme, now called the Rental Accommodation Scheme (RAS), whereby local authorities will assume responsibility for meeting the long-term housing needs of people on rent supplement for 18 months or longer. Housing will be provided through a mixture of social housing, housing provided by voluntary housing associations and new-build Public-Private Partnership projects (PPPs). Local authorities will engage in contractual arrangements with existing and new landlords to provide accommodation under the scheme.

Threshold considers that the Rental Accommodation Scheme has the potential to improve the situation of people in long-term housing need, but this will depend on how the scheme operates in practice. The transfer of the existing rent supplement budget will be insufficient to fund the scheme. Additional exchequer funding must be allocated to the scheme and to local councils that administer it.

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<sup>1</sup> Report to be published.

Organisations representing vulnerable groups are eager to ensure that the new Scheme will provide appropriate accommodation for people in long term housing need including people who are homeless. It is important that tenant's rights under the Residential Tenancies Act 2004 are not compromised and that all accommodation contracted under RAS is of good quality and is inspected by local authorities. The Homelessness Strategy should clearly set out the Government's intentions around using RAS as a means of housing people who are homeless and, if this is the case, how this process will be managed.

### ***Housing Needs Assessment***

The need for a holistic assessment of people's housing, health and other needs was deemed 'essential' in Homelessness – An Integrated Strategy. People who are homeless and have needs other than housing needs should have a holistic needs assessment, as part of their housing needs assessment. The assessment should be carried out with the client, and with the relevant statutory and voluntary service providers. A care plan, detailing the needs identified, the appropriate service provider and the funding of those services should then be agreed, communicated to the client and acted on. The outcome of this needs assessment should be subject to the appeals mechanism detailed below.

The appeals process should apply to situations where the service user disagrees with the decision made by the Local Authority in relation to:

- The assessment of long term housing need
- The categorisation of someone as 'homeless'
- The suitability of accommodation offered post assessment
- The outcome of an 'additional need' assessment

Key elements of an appeals mechanism should include:

- The right of the applicant to have a named advocate throughout the assessment process
- The right of independent redress
- Speedy resolution of appeals (the appeals process should be resolved within six weeks of being launched)

Local authority staff must be trained to carry out such assessments. Voluntary organisations should be consulted and could be involved in the delivery of such training.

### **Recommendations on Longer-term Solutions**

- **The government should adopt the National Economic and Social Council's recommendation that 73,000 social units be provided in the state between 2005 and 2012 as a matter of urgency.**

- **The provision of specific housing units that cater for the needs of single people is of the highest priority.**
- **There must be a guaranteed, ringfenced number of permanent housing places for people coming out of homeless services in each local authority area.**
- **It is strongly recommended that Threshold's Access Housing Unit be replicated in local authority areas throughout the country.**
- **The Access Housing Unit in Dublin should be augmented to address the specific needs of people leaving prison, unaccompanied minors, people leaving psychiatric institutions, young people leaving care (including institutions & foster care) and families and individuals in private emergency accommodation.**
- **The Department of Social and Family Affairs should increase rent caps to reflect the real cost of renting.**
- **Rent caps should not be used to restrict people who are homeless moving out of emergency accommodation and into the private rented sector through placement services such as Threshold's Access Housing Unit.**
- **The Homelessness Strategy should clearly set out the Government's intentions around using the new Rental Accommodation Scheme (RAS) as a means of housing people who are homeless and how this will be operate in practice.**
- **People who are homeless and have needs other than housing needs should have a holistic needs assessment as part of their housing needs assessment.**
- **Local authority staff must be trained to carry out needs assessments. Voluntary organisations should be consulted and involved in the delivery of such training.**

#### **4 Homelessness Prevention**

While the introduction of the Homeless Preventative Strategy in March 2002 was a welcome development, the absence of specific targets or resources has meant that its impact has been limited. Nevertheless some progress has been made in developing protocols around working with people at risk of homelessness leaving state institutions. In addition, prevention has been identified as is a priority issue in the current Dublin Homeless Action Plan 'Making It Home'. The HAIS should be reviewed in light of this increasing focus on prevention and more resources should be directed at prevention initiatives.

#### ***Advice, Information & Advocacy***

Homelessness prevention should be a key pillar of the national homelessness strategy going forward. Threshold has a key interest in the area of homelessness prevention. Threshold's advice services for people with housing problems are unique and are often the difference between housing and homelessness for many people experiencing problems such as threats of eviction, return of rent deposits or poor quality accommodation. Yet these services have not received any statutory funding from the Homeless Agency nor have they considered to be eligible for funding under streams of funding directed at homelessness under the national homelessness strategy. Given that one of the primary areas of focus of the new Homeless Action Plan for Dublin 'Making it Home' is in the area of homelessness prevention, Threshold sees the lack of financial support through the HAIS for advice, information and advocacy services that support people at risk of homelessness as a major gap in the overall strategy. The advice services provided by Threshold should be funded and replicated throughout the country as part of the Government strategy to prevent homelessness.

#### ***Residential Tenancies Act 2004***

The Residential Tenancies Act is a major step forward for the private rented sector. It puts the landlord and tenant relationship on a more business-like footing; the rights and responsibilities of landlords and tenants are clearly written down; and the means of resolving disputes will be more flexible and cheaper than in the past. The establishment of the Private Residential Tenancies Board as the regulatory body for the sector is most welcome.

In order to avail of the protections set out in the Act, tenants with housing problems and at risk of homelessness will need advice and advocacy support to present their case. Many people on rent supplement have poor self advocacy skills and have a fear of losing their tenure. Few will be able to afford legal representation if it is required. It is therefore crucial that Threshold and other information providers are provided with sufficient resources to meet new demands for support. The government should allocate additional funding under the HAIS to Threshold and other organisations who can support people to take

cases to the dispute resolution service established by the Residential Tenancies Act 2004.

### ***Review and Enforcement of Minimum Standards***

The Housing (Standards for Rented Houses) Regulations 1993 do not require a standard of housing that reflects today's living accepted living conditions. For example no refrigerator has to be provided, nor central heating; and the landlord does not have to supply a cooker, just the means of installing cooking equipment. There is no requirement for fire alarms or extinguishers. Neither have existing standards been enforced properly. Although 1,753 out of a total 4,703 inspections of private rented premises by local councils during 2003 revealed sub-standard conditions (42%), legal action was initiated only in eleven cases. Private rented dwelling standards should be up-dated by government as part its commitment to preventing homelessness and to ensuring that people who move out of homelessness are not condemned to live in poor standards at the lower end of the private rented market. Local authorities should also be compelled to inspect premises and to enforce minimum standards.

### **Recommendations on Prevention of Homelessness**

- **The advice and advocacy services provided by Threshold should be extended funding to be replicated throughout the country as part of the Government strategy to prevent homelessness.**
- **The Department of Social and Family Affairs should allocate additional funding under the national homelessness strategy to Threshold and other organisations who can support people to take cases to the dispute resolution service established by the Residential Tenancies Act 2004.**
- **The current Minimum Standards legislation should be reviewed as a matter of urgency.**

### **Concluding Remarks**

Since Homelessness – An Integrated Strategy was published in May 2000, considerable progress has been made in combating homelessness particularly in the areas of rough sleeping and the provision of emergency services for people who are homeless. This has come about as a direct result of strong Government investment in implementing the strategy and this level of investment must be maintained and enhanced to ensure similarly positive results in the future. Threshold believes that the prevention of homelessness and longer-term housing

solutions, particularly for single people who form the bulk of the homeless population, are the key challenges for the next phase of HAIS. Given this increased emphasis on the housing dimension, it is important that the reviewed HAIS and local homeless action plans are more closely integrated with the overall Government strategy on housing. Housing policy must become more flexible and responsive to the particular needs of people who are homeless and move-on accommodation set aside for people leaving emergency services. It is critical that homeless services are provided with the resources and support to effectively plan for the delivery of services over the medium to long-term, rather than on a year by year basis as is currently the case, in line with the overall aims of the national strategy.

## **Summary of Recommendations**

### **1 Homelessness Infrastructure and Resources**

- **Monies invested in the provision of private emergency accommodation should be redirected to the provision of additional social housing units and augmenting initiatives like Threshold's Access Housing Unit.**
- **Local Homeless Action Plans should be put on a statutory basis in order to ensure their timely delivery. It should be a requirement of the Homeless Action Plans that they set specific housing targets and monitoring mechanisms should be put in place to ensure these targets are actually met.**
- **Housing targets set out in Homeless Actions Plans should then be incorporated into other relevant strategies (including Housing Strategies and Social and Affordable Housing Strategies)**
- **A system of multi-annual funding for voluntary organisations must be developed. This should include fully funded care costs, and the standardisation of payment rates throughout the country.**
- **There should be clear nationally agreed funding mechanisms for settlement and tenancy sustainment services.**

- **Accountability and reporting structures need to be established for Homeless Fora around the country to ensure that they are carrying out their remit.**

## **2 Longer-term Solutions to Homelessness**

- **The government should adopt the National Economic and Social Council's recommendation that 73,000 social units be provided in the state between 2005 and 2012 as a matter of urgency.**
- **The provision of specific housing units that cater for the needs of single people is of the highest priority.**
- **There must be a guaranteed, ringfenced number of permanent housing places for people coming out of homeless services in each local authority area.**
- **It is strongly recommended that Threshold's Access Housing Unit be replicated in local authority areas throughout the country.**
- **The Access Housing Unit in Dublin should be augmented to address the specific needs of people leaving prison, unaccompanied minors, people leaving psychiatric institutions, young people leaving care (including institutions & foster care) and families and individuals in private emergency accommodation.**
- **The Department of Social and Family Affairs should increase rent caps to reflect the real cost of renting.**
- **Rent caps should be not be used to restrict people who are homeless moving out of emergency accommodation and into the private rented sector through placement services such as Threshold's Access Housing Unit.**
- **The Homelessness Strategy should clearly set out the Government's intentions around using the new Rental Accommodation Scheme (RAS) as a means of housing**

**people who are homeless and how this will be operate in practice.**

- **People who are homeless and have needs other than housing needs should have a holistic needs assessment as part of their housing needs assessment.**
- **Local authority staff must be trained to carry out needs assessments. Voluntary organisations should be consulted and involved in the delivery of such training.**

### **3 Prevention of Homelessness**

- **The advice and advocacy services provided by Threshold should be extended funding to be replicated throughout the country as part of the Government strategy to prevent homelessness.**
- **The Department of Social and Family Affairs should allocate additional funding under the national homelessness strategy to Threshold and other organisations who can support people to take cases to the dispute resolution service established by the Residential Tenancies Act 2004.**
- **The current Minimum Standards legislation should be reviewed as a matter of urgency.**