



Pre-budget Submission 2015

To Department of Social Protection

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1. Introduction

Threshold is a national housing charity that provides housing information, advice and advocacy services for people with housing problems and people at risk of homelessness. Last year our advisors dealt over 19,000 housing queries from tenants living in the private rented sector. Threshold makes this submission to the Department of Social Protection (DoSP) as part of Budget 2015. We ask that the Minister uses this Budget to protect people at risk of homelessness by alleviating the difficulties experienced by tenants under the Rent Supplement (RS) scheme. As a direct result of previous changes to RS and the current shortage of rented accommodation in urban centres Threshold's national service has encountered:

- Individuals and families faced with an increased risk of homelessness as a result of rising rents;
- Increase in prevalence of top-up payments to cover the difference between RS limits and market rents;
- Landlords are displacing RS tenants and no longer accepting RS payments.

Recommendations

We ask the Minister to use Budget 2015 as an opportunity to protect RS tenants:

- Increase rent supplement limits in a targeted way to take account of the difficulties for rent supplement recipients in high demand areas;
- Support the introduction of rent control as a measure to give greater stability and certainty to rent supplement recipients who face increased difficulties in accessing and retaining homes in the current rented market;
- Ringfence any budgetary savings made under the rent supplement scheme as a result of improving economic conditions to provide greater flexibility for households that face difficulties with retaining or securing accommodation;
- Extend the current homelessness prevention protocol for families in Dublin to single person households and to other urban centres including Cork, Galway and Limerick;
- Restore the face-to-face aspect of the rent supplement application process and increase flexibility for DoSP Representatives to exercise discretion;
- Expedite the introduction of the Housing Assistance Payment (HAP) for long term recipients of rent supplement;
- In anticipation of HAP, treat people who are homeless as a special category and introduce an interim arrangement that would enable them to avail of higher maximum rent limits;
- Introduce clear guidance for DoSP Representatives to deal with circumstances where receivers are appointed to properties with rent supplement tenants;
- Prioritise social welfare appeals related to rent supplement and better utilise the local review process to avoid the necessity for appeals;
- Provide additional funding to enable an extension of Threshold's second-tier support service to MABS, DoSP Representatives and other advisory bodies.

2. Benefits of Threshold's Work to Department of Social Protection

Threshold assists a high proportion of private rented tenants and this is beneficial for both RS tenants and the Department of Social Protection (DoSP). Threshold also delivers a second-tier support service to advisors in Citizens Information Centres. This enhances their capacity to deal with housing queries related to RS and in the private rented sector more widely.

a) Threshold is Preventing Rent Supplement Tenants from Losing their Homes

Threshold provides free, confidential and professional housing advice and advocacy services nationally through our national telephone services and regional advice centres in Dublin, Cork and Galway and various outreach services. Last year our advisors dealt with over 19,000 housing queries from tenants living in the private rented sector. The main source of income for 40% of our clients in 2013 was a social welfare payment, the vast majority of whom were in receipt of RS. Threshold is therefore interfacing with a considerable proportion of the clients of the Department of Social Protection.

A crisis of affordability has emerged in the rental market since last year and Threshold's services are in high demand from RS tenants facing rent reviews, termination of tenancies and difficulties in accessing accommodation. This trend has continued in the first half of 2014; we have experienced a substantial increase of 169% in the number of queries in relation to rent reviews. Rents are rising to unsustainable levels and the poorest people are being pushed out of their homes. A serious housing supply issue means that families have little or no alternatives if they lose their current accommodation. Nevertheless it remains the case that tenants are protected to an extent under law and, with Threshold's help, they can successfully challenge a rent review or dispute a notice given by the landlord to leave their accommodation.

Over 140 families are currently homeless and living in Dublin hotels after losing their private rented accommodation. The majority were previously living in accommodation supported by the RS scheme. The increased prevalence of families at risk of homelessness is a new phenomenon brought about by rising rents for family type homes. In order to address this issue, Threshold is playing a lead role in a homelessness prevention initiative being delivered by the Dublin Region Homeless Executive on behalf of the Dublin local authorities with the support of the Department of Social Protection. Targeted support is being made available through a freephone helpline to families who face the immediate prospect of becoming homeless. A protocol has been developed with the Department of Social Protection to keep families in their homes until a longer-term sustainable option has been identified with the assistance of the local authorities.

Threshold's services are more critical now than at any time since the beginning of the economic downturn and the effectiveness of our interventions is proven. An independent study, carried out by housing consultant Simon Brooke, *Does Housing Advice Work?* (2010) found that Threshold has an 83% success rate in preventing

homelessness. The current cost of an hour of Threshold's housing advice is €24, which is remarkably low when compared with the cost of emergency homeless accommodation at approximately €22,000 per annum. **Threshold is seeking financial support from the Department of Social Protection in recognition of the key role that our advice centres are playing in protecting RS tenants from losing their homes during the current housing crisis.**

b) Threshold is Supporting Citizens Information Services, MABS and DoSP Representatives

The Citizens Information Board is the national agency responsible for supporting the provision of information, advice and advocacy on social services and for the provision of the Money Advice and Budgeting Service. Threshold receives a high volume of client referrals from Citizens Information Centres, MABS and DoSP Representatives.

Our specialist skills in housing issues was formalised with the Citizens Information Board in April 2012, with Threshold providing expert second tier support to staff and volunteers of Citizens Information Centres on complex housing issues including RS. The dedicated CIC advice helpline launched in April 2012 and to date has dealt with almost 1,300 unique queries from 84 individual Citizen Information Services in all 26 counties. The Dublin region represents a significant percentage of all queries received (37%).

Informally MABS are already accessing our support regularly, but there is considerable scope to formalise this arrangement in order to meet demand of the 60 MABS offices nationwide. DoSP representatives also refer clients to Threshold where they face a housing difficulty with their landlord. **We would ask the DoSP to provide additional funding to Threshold to expand on the existing formalised second-tier support service to allow its extension to MABS, DoSP Representatives and other advisory bodies.**

3. Rent Supplement Tenants Face an Increase Risk of Homelessness

The inadequacy of RS limits, significant increases in rent levels, and the practice of topping up RS payments to bridge the gap between rent limits and the actual rent have placed tenants at increased risk of homelessness.

a) Misalignment of Rent Supplement Limits and Market Rents

RS limits have been increasingly out of kilter with the market since 2012. Cumulative RS reductions of 20-25% and a more than doubling of tenant contributions were implemented from 2009 to 2012. While average rents fell across the country in 2008 and 2009, they quickly stabilised in urban areas from 2010 to 2012, and since then they have been on an upward trajectory in the main urban centres. RS has not kept pace with these changes, despite the 10% increase in urban rent limits introduced in June 2013.

According to property website Daft.ie, average rents nationwide increased from 2.2% at the end of 2012 to 7.1% at the end of 2013, mainly driven by an 11.2% annual increase in Dublin rents. Rents in Cork and Galway increased by over 4% and

rents in Limerick by 3.6% with only Waterford seeing a 0.6% decrease. Rental affordability has deteriorated further in 2014, with an annual increase of 9% in average rents nationwide at the end of the first quarter, including 14% in Dublin, 6% in Cork and Galway, 5% in Limerick and 1% in Waterford. The Private Residential Tenancies Board (PRTB) rent index for Q1 2014 showed a similar trend with rents nationally 3.5% higher than the same time in 2013 and rents in Dublin up by 8.4%.

Until recently, it was predominantly single people who experienced the most difficulties in securing affordable rental accommodation but this has now extended to families. Competition for family homes has driven up rents and removed the choice that previously existed for low income families. A divergence between maximum rent limits and market rents have resulted in an increased vulnerability to homelessness, actual homelessness and have made it more difficult for families who are moving out of homelessness to secure appropriate accommodation. Many landlords are increasing rents above RS limits in order to seek higher-paying tenants and others are refusing RS altogether. **Threshold is asking that rent limits be increased in a targeted way to take account of the difficulties for RS recipients in high demand areas.**

Despite assurances from the DoSP that discretion may be exercised in cases of homelessness, it is Threshold's experience that this is not common practice. In this respect, **Threshold welcomes the recent protocol arrangement introduced by the Department of Social Protection to safeguard families in Dublin who face an immediate risk of becoming homeless.** In exceptional cases, the protocol allows for RS limits to be exceeded for a period of three months until a sustainable long term housing option is identified. **Given the increased pressures faced by single person households and RS recipients in high demand areas, we are asking that this protocol be extended to other household types and to other urban centres including Cork, Galway and Limerick.**

b) Difficulties Meeting Housing Costs and Prevalence of Top-up Payments

RS limits do not accurately reflect the true amount of rent being paid by RS recipients and that insufficient consideration is being given to the additional payments being made by tenants. The practice of accepting top-up payments, where a landlord states a lower rent in order to comply with RS limits but charges a higher amount to the tenant, is widespread amongst the vulnerable clients that seek Threshold's help with one out of every two clients topping up (see text box below).

Threshold's top-up surveys 2012 -2014

- A survey of 100 RS clients carried out by Threshold in Dublin, Cork and Galway between **April – June 2012** found that **55% were making top-up payments**. Two-thirds (67%) of those making extra payments said it affected their spending in other areas.
- A second survey of 125 RS clients in **January 2014** found that **47% were making top-up payments**.
- A third survey of 133 RS clients carried out from **April – June 2014** found that **44% were making top-up payments**.

Top-up payments represent a long-standing practice within the operation of the RS scheme and are integral to the emergence of material deprivation among some claimants. Top-up payments impact on the disposable income available to tenants for essentials such as food, clothing and heating. It is now seen as being the norm by many tenants who face difficulties in either remaining in their existing tenancy or sourcing a new one. They are resigned to not being able to find accommodation under the maximum rent level and see this as the only way they can secure reasonable accommodation.

Case Study – Galway lone parent making top-up payment

Michelle is a lone parent with one child living in Galway city and claiming Rent Supplement. The landlord was living abroad but had to move back to Ireland and Michelle was served with notice. She needed to live in the same area as her son had his name down for the local school. It took Michelle over two months to find accommodation that would accept RS. The accommodation is not within the rent limit. Michelle is making a top-up payment of €150 per month.

Threshold believes top-up payments should be a concern to the DoSP. Vulnerable tenants are being exploited by landlords and tenants are falling into arrears. Top-up payments mask the true level of rent being paid and RS limits that fail to take account of top-ups are therefore flawed. **The actual rent paid by tenants will be of considerable importance in the transfer of administration of long-term RS recipients to local authorities under the Housing Assistance Payment, as it will**

represent the true cost of the new scheme. Threshold is also concerned about the level of rental income from illegal top-ups that may be undeclared for tax purposes and we have recently met with Revenue to discuss how this may be addressed.

Case Study – Dublin family being asked to pay further top-up payment

Pamela and family have been living in Dublin accommodation for almost four years. The rent is currently €1050 which is €100 above the rent limit. Pamela is meeting this from her welfare payment which is causing extreme financial hardship. The landlady proposed a further €150 rent increase which Pamela is disputing with Threshold's help through the PRTB. Pamela fears that regardless of the outcome of the dispute the landlady will refuse to sign review forms and as a result she will lose the accommodation. She has been looking at alternative accommodation for over two months but has been unable to access it.

Case Study – Difficulties in sourcing family accommodation in Galway city

Michael and his family are living in Galway city and were served a Notice of Termination in February 2014. At the termination of the notice, Michael still had not found a property. Following Threshold's intervention, the landlord allowed Michael to stay a bit longer in the property. It took Michael and his family 4 months to find a landlord that would accept rent supplement and a property that was within rent limits.

4. Availability of Accommodation within Rent Supplement Limits

The private rented sector is the second largest housing tenure in Ireland and has witnessed a dramatic increase from 10% of housing stock in Census 2006 to 19% in Census 2011. The number of RS recipients currently stands at 78,000 compared with an average of 60,000 recipients per annum before the economic downturn. RS tenants are competing with other low income working households and those who would have previously accessed homeownership with ease for a diminishing supply of rented accommodation.

The stock of properties available for rent has fallen significantly in recent years. Daft.ie reports that just 10,000 rental properties were advertised with the site in

the first four months of 2014 in Dublin, compared to 18,000 in the same period in 2012. A combination of growing demand and dwindling supply, together with reductions in RS payments, are making it increasingly difficult for tenants to find and retain RS accommodation.

The most recent review of Maximum Rent Limits came into effect in June 2013. The review did recognise that rents are rising around the country, particularly in urban areas and the limits were increased for particular categories of applicants in a number of areas. However, the rate of increase in rents is such that by the time the revised were introduced in June 2013, the actual rents had already outstripped the increases.

There is regular evidence from clients of Threshold that maximum rent levels are out of step with the market. A basic comparison of maximum rent limits with actual average rents drawn from the PRTB/ERSI Rental Price Index show that there is a significant gap between the two in all areas of the country.

Maximum Rent Levels 2013 vs. Average Rents 2013

Area: Dublin City	Single	Couple with no Children	Couple 1 child or one parent family 1 child	Couple 2 children or one parent family 2 children
Maximum Rent Limit	€520	€700	€ 850	€ 900
Average Rent Quarter 4 2013	One Bed	One Bed	Two Bed	Three bed
	€798	€798	€1032	€1140

Area: Cork City	Single	Couple with no Children	Couple 1 child or one parent family 1 child	Couple 2 children or one parent family 2 children
Maximum Rent Limit	€485	€575	€ 700	€ 725
Average Rent Quarter 4 2013	One Bed	One Bed	Two Bed	Three bed
	€601	€601	€802	€850

Area: Galway City	Single	Couple with no Children	Couple 1 child or one parent family 1 child	Couple 2 children or one parent family 2 children
Maximum Rent Limit	€475	€540	€ 700	€ 725
Average Rent Quarter 4 2013	One Bed	One Bed	Two Bed	Three bed
	€623	€623	€781	€871

It is important to note that there is a significant variation in rent levels within urban and geographical areas. **A detailed examination of rents in the above areas will be provided to the DoSP as part of Threshold's submission to the review of maximum rent limits.**

Case Study – Difficulties in sourcing family accommodation in Cork city

Mary who has six children is a model tenant whose landlord went into receivership and the property is being sold. She has one more week before she and her children becomes homeless. Although she has been granted an exceptional payment of an additional €50 per month it is impossible to source a property at that amount. She is prepared to move 30 miles in any direction from her present home, uproot her children from their school and their friends and Threshold still cannot source a 4 bedroom property for her. She is also willing to move into a 3 bedroom property if necessary.

5. Administration of Rent Supplement

Delay in processing RS applications through Central Rent Units as well as delays in the social welfare appeals negatively impact upon tenants. It is also important that due consideration is given to the difficulties faced by RS tenants where the landlord is in financial difficulty and a receiver is appointed by a financial institution to the property.

a) Operation of Central Rent Units

A key change in the RS Scheme has been the centralisation of the processing system, intended to introduce greater efficiency within an environment of rising expenditure. At present, 23 Central Rent Units (CRUs) are listed on the DoSP website including 12 units covering Dublin, Mid Leinster (covering Carlow, Wicklow and Kildare), Meath, Offaly, Galway, Fermoy, Mallow, Clonmel, Tralee, Waterford, West Waterford and Cavan. The application process operates on the basis that RS claimants gather together all the required documentation and post it to the relevant CRU. It is acknowledged that that the centralization of RS processing is intended to achieve efficiencies, thus cutting costs and providing a more streamlined service. However a number of concerns have been raised.

Citizen Information Service (CIS) research conducted in 2012 in Blanchardstown, Northside, Kildare and Wicklow evaluated 55 clients' experiences when accessing CRUs. The CIS research found that 76 per cent of respondents reported difficulties making contact with CRUs, while 52 per cent complained of lengthy delays when waiting for a decision on their application. It was also found that claimants had encountered a range of communications and processing difficulties when dealing with the new system.

In addition, clients repeatedly report to Threshold that payments are suspended/terminated without any prior notice. Clients still continue to receive verbal refusals of payment without any formal written decision, making an appeal very difficult. Overall many RS claimants accessing Threshold are dissatisfied with the

operation of CRUs, particularly those who require supports to complete their application e.g. those with literacy problems, or migrants who do not speak English.

Threshold is calling for a review of the operation of CRUs to ensure that processing times are considerably reduced to match the claimants' requirement to secure accommodation in a private market. The face-to-face aspect of the service should be restored and greater flexibility provided to enable DoSP Representatives to exercise discretion to assist claimants. DoSP Representatives should be available to applicants, advocacy groups and public representatives to answer queries and to receive additional information. The provision of timely written decisions and an expedited and independent appeals process is also critical.

b) Social Welfare Appeals

In cases where an application for RS has been denied, claimants are entitled to appeal this decision. Evidence suggests that a high proportion of first-instance decisions are overturned at the appeals stage. In 2012, of 5,323 appeals finalized in relation to the Supplementary Welfare Allowance, some 37.3 per cent were either allowed in full or in part or resolved by way of a revised decision (Social Welfare Appeals Office, 2012:7).

However, Threshold has assisted many tenants through this process and note how the operation of the system places this group in a vulnerable housing position. RS is not paid while a dispute is under consideration, and Threshold reports that many clients are dependent on family or friends to continue paying the rent. For some, their tenancy is put at risk as some landlords who are uncertain of a positive tenant outcome issue a tenancy termination notice.

The time taken to have an appeal heard and the reduced availability of interim payments to cover rent while an appeal is pending both pose difficulties for clients. As FLAC (2012) notes, government commitments to prioritise the Supplementary Welfare Allowance appeals process have fallen short, with an average time of 52 weeks to finalise the oral hearing process and 25 weeks for a summary decision. As a result, tenants may not receive their payment for more than a year after applying for it. Second, while, appellants may apply for an interim payment to tide them over during an appeal, Threshold staff report a significant decline in the numbers of such payments in recent years.

Threshold is calling for better use of the local review process to avoid the necessity for a formal appeal. The initial application process should not penalise tenants for being unable to obtain documents that the Department should be requesting directly from landlords. For example, proof of tenancy registration with PRTB and proof of ownership of property. **Where a formal appeal is lodged, RS appeals should be prioritised in the interests of preventing households from becoming homeless.** Under the Residential Tenancies Act 2004, a tenancy continues pending the outcome of a dispute and the same principle should apply to social welfare appeals. Interim payments should be made in all circumstances where the tenant cannot afford to pay the rent while an appeal is pending. Payment should be immediate where an appeal

has been successful.

c) Procedures to Deal with Receiverships

A growing problem for RS tenants is where a landlord has defaulted in mortgage repayments and the lending institution has appointed a receiver to the property. It is estimated that some 3,700 receiverships are currently in place with respect to buy-to-let properties. Some receivers are using uncertainties in relation to RS as way of removing tenants from properties. It is important that the DoSP puts procedures in place to ensure that RS tenancies cannot be terminated by stealth where a tenant has not breached their obligations in any way.

It is Threshold's experience that some receivers are contacting DoSP Representatives and demanding that RS payments to the original landlord are stopped. In the absence of guidance, DoSP Representatives do not verify the appropriate facts and do not consult with tenants who may only become aware of the situation when their payment is refused. In other cases, receivers may refuse to complete paperwork sought by the DoSP which leads to the payment being stopped. It is important that the DoSP protects tenants from being victimised in this way.

In a time of rising rents, it is critical that a tenant's right to remain in their home is upheld by the DoSP. If DoSP Representatives continue to stop RS payments without making appropriate enquiries, the net effect will be to displace RS tenants from properties with lower rents into properties with higher rents. It may be in the interests of receivers to drive up rents, but it is not in the interests of RS tenants or the DoSP.

Threshold is calling on the DoSP to recognise the difficulties being caused to tenants by the appointment of receivers and to put a protocol in place. Threshold is also seeking the DoSP's support for a legislative change that clarifies the obligations of receivers. Threshold has made a submission to the Minister for Housing and Planning seeking the inclusion of a legislative amendment in the forthcoming Residential Tenancies (Amendment) (No. 2) Bill 2012 to confirm that receivers take on all the legal obligations of the landlord and must act accordingly. A copy of this submission has been forwarded to the Minister for Social Protection.

6. Rollout of Housing Assistance Payment

In June 2011, the Government launched a new housing policy statement and announced transfer of the administration of long-term RS recipients (18 months+) from the DoSP to local authorities on a phased basis with the introduction of the new Housing Assistance Payment (HAP). Threshold welcomes the current passage through the Oireachtas of the Housing (Miscellaneous Provisions) Bill 2014 which provides a legislative basis for HAP. Threshold believes that HAP will give existing RS tenants a stronger foothold in the private rented sector and better access to other longer-term social housing options.

The roll-out of HAP will level the playing field for those who are currently disadvantaged by the housing system. The vast majority of people on housing waiting lists are single people, who have had little likelihood of being allocated a house by their local authority. As a result, they have been confined to RS accommodation at the lower end of the private rented market. Under HAP, they will have direct links with their local authority and access to other social housing options.

Tenants are also currently disadvantaged when they receive RS because they're competing in a market where other tenants can pay landlords their monthly rent, in advance and by direct debit. Under the RS scheme, the landlord must collect the rent and the contribution from the tenant. Threshold is pleased to note that the design of HAP will involve direct payment to landlords and we note the legislative change that has been introduced to make deduction at source a more viable option under the Household Budget Scheme. Threshold has called for direct payment over many years as it safeguards the security of the tenancy and eliminates the possibility of top-up payments.

RS recipients are also disadvantaged because, if they take up work, they place their housing support payment at risk. A critical aspect of the new HAP payment is that it will be means-tested, like local authority rents, rather than based on the current system of maximum rent limits. This means that recipients will be able to take up employment while still receiving some state assistance with their housing costs. This will remove the single greatest criticism of the current RS scheme which is that it is a 'poverty trap' that acts as a disincentive to work.

A number of HAP pilots are currently underway in local authority areas and this is welcome. Threshold has undertaken exploratory research on behalf of the Dublin Region Homeless Executive as part of the design of a HAP pilot for people who are homeless. A landlord survey conducted as part of this research found that landlords were favourably disposed towards key aspects of the scheme and would consider providing accommodation for homeless people under HAP. This is quite a positive response given current rented market conditions.

Given the critical difference that HAP is likely to make to the lives of longer-term RS recipients, it is important that HAP is fully rolled out without delay. We understand the importance of piloting the HAP payment, however **Threshold believes that the full rollout of the HAP scheme should be brought forward given the negative conditions that currently prevail in the housing market. In the meantime, people who are homeless should be treated as a priority under HAP.** An interim arrangement should be introduced that will enable homeless people to avail of higher maximum rent limits as part of process agreed by state actors, state practitioners and the voluntary sector.

7. Need for Rent Control

RS limits need to be realistic, and they need to reflect the rents that people are actually being asked to pay. But the State also needs to ensure that rents don't keep continuously rising beyond affordable limits for RS recipients. To stem the current crisis in a sustainable way, Threshold has called on the Minister of Housing and Planning to introduce a system of rent regulation ('rent control') that allows for reasonable and predictable rent increases and provides stability for both tenants and landlords.

Ireland actually has a measure of rent control already, under the 2004 Residential Tenancies Act. This legislation allows for rents to be reviewed annually and only to market levels. However this is not sufficient to protect tenants from the increases of 20-50% that some of Threshold's clients are facing. The Minister for Housing has asked the PRTB to commission a study to look at examples in other countries – for example, where rents are related to increases in consumer price indexes - and the findings of this study will be reported to the PRTB in July.

Threshold is asking the Department of Social Protection to support the introduction of rent control as a measure to give greater stability and certainty to RS recipients who face increased difficulties in accessing and retaining homes in the current rented market.

8. Recommendations

Threshold asks the Minister to be cognisant of the prevailing supply and demand trends presented in this submission to Budget 2015 and to protect the most vulnerable in the private rented sector who are dependent upon RS to provide their accommodation and to ensure SWA limits strengthen, rather than weaken RS claimants' position in the housing market. The Minister can do this in the following ways:

- Increase rent supplement limits in a targeted way to take account of the difficulties for rent supplement recipients in high demand areas;
- Support the introduction of rent control as a measure to give greater stability and certainty to rent supplement recipients who face increased difficulties in accessing and retaining homes in the current rented market;
- Ringfence any budgetary savings made under the rent supplement scheme as a result of improving economic conditions to provide greater flexibility for households that face difficulties with retaining or securing accommodation;
- Extend the current homelessness prevention protocol for families in Dublin to single person households and to other urban centres including Cork, Galway and Limerick;
- Restore the face-to-face aspect of the rent supplement application process and increase flexibility for DoSP Representatives to exercise discretion;
- Expedite the introduction of the Housing Assistance Payment (HAP) for

- long term recipients of rent supplement;
- In anticipation of HAP, treat people who are homeless as a special category and introduce an interim arrangement that would enable them to avail of higher maximum rent limits;
 - Introduce clear guidance for DoSP Representatives to deal with circumstances where receivers are appointed to properties with rent supplement tenants;
 - Prioritise social welfare appeals related to rent supplement and better utilise the local review process to avoid the necessity for appeals;
 - Provide additional funding to enable an extension of Threshold's second-tier support service to MABS, DoSP Representatives and other advisory bodies.