
7th March 2018

1 Introduction


The Irish Council for Social Housing (ICSH) is the national federation of housing associations in Ireland. The ICSH has 270 affiliated member housing associations providing accommodation for families, single people, the elderly, homeless people and people with disabilities. There are currently over 40 ICSH members providing housing related services specifically for the homeless nationwide.

2. Context

Housing associations provide accommodation for people who are disadvantaged and homeless people through a number of different models of accommodation including family type accommodation, hostels, transitional accommodation, long term supported accommodation, hubs, supported housing for elderly and for persons with disabilities.

The provision of accommodation is linked with care and support services, depending on the type of scheme. Formerly homeless households are accommodated in all of these models of accommodation, for example sheltered housing schemes for the elderly take referrals from homeless services for homeless people who are older.

The recommendations in this submission are underpinned by the view of ICSH members that the key focus should be to increase the supply of homes. The ICSH have long advocated for a Housing Led and Housing First approach to the challenge of homelessness and welcomes government policy that this would be a core principle of any strategy or action plan.
Housing Supply

To achieve a housing led approach, an adequate supply of permanent accommodation suitable to the needs of homeless persons is fundamental and should be reflected throughout the new plan.

AHBs are currently improving their output and ramping up delivery under both the Capital Assistance Scheme and under SHCEP. Members would typically develop under the Capital Assistance Scheme (CAS) to deliver accommodation for homeless households.

The ICSH continues to make recommendations to local authorities and the Department of Housing, Planning and Local Government (DHPLG) to improve the level and speed of delivery under CAS including:

- A multi annual funding CAS programme.
- More flexibility in the CAS call process regarding deadlines and carrying forward.
- Consistent operational processes to be adopted across all LA’s.
- Timelines to be adopted for all levels of approvals and sanctioning and payments for all stakeholders, Department, Housing Agency, LA and Housing Associations.
- Quicker timeframes for the 4 stage approval process and reduction where there is duplication in the approvals process.

Supporting housing associations to increase delivery will ensure continued exits from homelessness. Whilst the roll out of homeless HAP has successfully moved many families and individuals out of homelessness, the focus should continue to be on the supply of permanent social housing. An over reliance on the private rented sector in which, despite recent legislative changes, there are significant issues with security of tenure and long term outcomes for tenants in maintaining their tenancy.

Housing First

- The ICSH supports the commitment in Rebuilding Ireland to the housing first project with the participation of housing associations, local authorities and other statutory bodies across urban areas to support people who have complex needs to move into accommodation and maintain a tenancy.

Section 10

- The ICSH recommend that section 10, as a revenue funding stream, should continue to be focused on staffing, services and supports for homeless services.

Nominations Protocol

- Ensuring timely nominations to housing associations from local authorities. The ICSH Housing Association Performance Management (HAPM) figures demonstrate year on year that the lack of timely and appropriate nominations from the Local Authorities are the most common reason for delays in re-letting.
Single persons

The number of single person households continues to be high in the Housing Needs Assessment however this cohort of people are generally a much lower priority to be housed. A focus on providing for single person households should be included.

Rapid Build Housing

ICSH members believe that, in the current crisis and with escalating numbers experiencing homelessness, rapid build housing options can offer a much needed alternative to emergency accommodation, B&Bs and commercial hotels.

This housing supply option should work in tandem with the range of targets and actions across the pillars of Rebuilding Ireland and the planned building programme underpinning this. ICSH members believe that of the options available for rapid build housing, those supplied should be of good quality and with a long lifespan. These homes should be located near services, schools etc.

Whilst members appreciate the urgency of addressing the needs of families currently in emergency accommodation and hotels, there is a concern about only housing this cohort and the risk of ‘ghettoising’ homeless families in identifiable concentrations / pockets of modular housing. Given the government policy of building sustainable communities, options should be considering to widening this at the outset to house single persons, older persons etc.

Family Hubs

The provision of family hubs as an alternative to commercial hotels and other forms of emergency accommodation is understood. However the placement of families in hubs should remain strictly on a short-term basis only with clear plans put in place to identify long-term housing options. The use of hubs is part of the emergency response and should not be seen as a solution. The focus needs to remain on the provision of long-term homes.