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.

Housing associations provide accommodation for people who are disadvantaged and homeless people through a number of different models of accommodation as follows:

- General family type accommodation
- Hostels
- Refuges
- Transitional accommodation
- Long term supported accommodation
- Group homes for persons with disabilities
- Group housing schemes with low support for elderly
- Sheltered housing schemes for elderly

The provision of accommodation is linked with care and support services, depending on the type of scheme. Formerly Homeless people 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 Government Homelessness Policy Statement (February 2013) contains the policy objective to end long term homelessness and the need to sleep rough by 2016, by implementing a housing led approach.
The ICSH have set out in this submission key recommendations for the Homeless Action Plan 2014 – 2016 and the achievement of the overall objective of the statement.

**Housing Supply**

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

Since 2009, a wide range of housing supply initiatives have been introduced including leasing, CALF, mortgage to rent etc.. Most of these initiatives were linked to the economic downturn and the property market crash and in many cases the policy objective of these initiatives and the operational side has not been adequately aligned to allow delivery in a timely manner.

The ICSH, through its members and in response to Government, have worked through all these new initiatives to identify where all the current hurdles exist and what solutions the sector believe should be put in place. These proposals have been forwarded to the Department of Environment, Community and Local Government (DECLG).

In realising the capacity of non-profit housing associations to deliver accommodation and supports for homeless persons, the ICSH would also make the following recommendations:

**Capital Assistance Scheme (CAS)**

Approved housing bodies have a proven track record in delivery for accommodation for the homeless using the CAS scheme. The ICSH recommend that the CAS budget is prioritised in order to contribute to ensuring the permanent accommodation is delivered for homeless households.

**NAMA**

In order to ensure delivery on properties from NAMA specifically prioritised for homeless persons, the scheme should be made more attractive to enable greater take up. Difficulties with Multi Unit Development compliance and delays with the NARPS lease have limited outcomes to date. There is scope to examine the potential ‘enhancement’ of the scheme where the units are for homeless households as was offered in the enhanced leasing conditions.

There is also an issue with affordability as the NAMA stock, which is primarily apartments, comes with very high service charges. This creates difficulties in ensuring the long term financial viability of managing this accommodation.
Housing First

The ICSH supports the implementation of the Housing First Demonstration Project with the participation of approved housing bodies, local authorities and other statutory bodies 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 the implementation of the protocol in partnership with the Local Authority is crucial. 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 reletting.

In addition, approved housing bodies can play a role in examining options for using the long term voids in Local Authority stock.

Housing Needs Assessment 2013

The 2013 Housing Needs Assessment figures will be published soon and will provide a breakdown of housing demand and a breakdown of homeless people on the housing list in Dublin, this information should be used to underpin any action plan for the Dublin regions

Engagement with financial institutions

Greater engagement with financial institutions is the key to accessing the property portfolio / distressed assets in Dublin which could then be made available to homeless households.

Social Rental Agencies

The use of a social rental agencies should be explored in Dublin, on a pilot basis, using the learning from Cork from Cork Simon, St Vincent de Paul, Focus Ireland and Threshold and the Belgian model.

Buy to Let

The move from rent supplement to the Housing Assistance Payment (HAP) offers an opportunity for local authorities to approach landlords and develop opportunities for additional units. A targeted programme in the ‘Buy to Let’ market has potential for

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additional supply for homeless persons. There also needs to be a ‘co-ordinated’ approach to sourcing accommodation in Dublin. This is required to avoid the current duplicity of approach by a number of individual organisations, providing unnecessary competition. This could be tested via the current private sector fast track team i.e. the 'Rent Supplement Pilot Initiative'.

**Effective use of existing supply**

The ICSH (on behalf of its members), the Dublin Regional Homeless Executive (DRHE) and the four Dublin Local Authorities signed a ‘Protocol for Social Housing Nominations within the Dublin Region’ in November 2011. This protocol represented the approach to nominations in the Dublin region in the context of the Homeless Strategy and the purpose was to maximise the number of units for homeless households through a streamlined and efficient nominations process.

In practice the implementation of the protocol has been very disappointing and the ICSH strongly recommend the full implementation of the protocol with rigorous reporting and monitoring of the nominations.

**Assessment**

A time frame of four weeks should be established for the assessment of homeless people and in line with the oversight of service delivery; the completion of assessments should be monitored for homeless persons. It is important that Person Centred Plans are shared with AHBS in taking homeless referrals and in relation to the SLI scheme.

**Residential Tenancies Board and transitional accommodation**

The ICSH have recommended to the Department of the Environment Heritage and Local Government that an exemption exists in the Residential Tenancies Amendment Bill for transitional accommodation services in relation to the acquisition of Part 4 tenancies under the amended RTB legislation. Such transitional services include homeless services, domestic violence services, rehabilitation services such as acquired brain injury, and specific services for people with disabilities. These services have been set up to respond to demand and a genuine need, with the aim of leading people to permanent accommodation. These services will be made redundant if they are to come under part 4 of the bill, this would be an unintended consequence of the amendment bill, and not in line with the aims of the legislation.

Clients within these services would still have access to the dispute resolution aspect of the RTB.

The ICSH request this is issue is considered and supported in the drafting of any action plan.
**RTB- Deposit Retention Scheme**

The deposit ret scheme in context of the RTB could potentially facilitate access greater access to the Private Rented Sector units. The ICSH supports the Deposit Retention Scheme exempting people in receipt of rent supplement and the provision of deposits to landlords via a stated funded mechanism.

**Monitoring the Action Plan**

The ICSH recommend the establishment of a quality control unit by statutory agencies to oversee the quality of service delivery and value for money throughout the action plan. The ICSH welcomes the new Performance Reporting under the devolved section 10 funding Protocols and the inclusion of a housing supply indicator to the those in the Homeless Policy Statement.

**Co-ordination**

Greater co-ordination for the housing association sector within Government itself is essential if there is a real desire to translate the objective of the sector playing a more enhanced role and delivering more homes to those in housing need and ending long term homelessness.

**Conclusion**

The core focus of the action plan should be on the sourcing of long term accommodation for homeless households. The ICSH and non-profit housing associations are willing partners in the implementation of the plan to achieve this common aim. The ICSH has contributed to the development of this HAP through representation on the Dublin Joint Homeless Consultative Committee (DJHCF) and Implementation Advisory Committee (IAG) and welcome inclusion of some of the above points in the final document as well as assisting in its delivery.