

Stakeholder Consultation on “Housing for All” Policy Statement and Action Plan

Survey Questions

1. Name of Organisation:

Citizens Information Board (CIB)

2. Briefly describe your organisation?

CIB is the national agency responsible for supporting the provision of information, advice and advocacy on social services, including, through MABS, support for people experiencing mortgage repayment issues. Citizens Information Services (CISs) dealt with over 60,000 housing related queries from members of the public in 2020 and 90,000 in 2019.

300 character(s) maximum

3. Having regard to the housing objectives set out in the [Programme for Government](#), what other key objectives should be considered? How should these objectives be prioritised?

3000 character(s) maximum

CIB supported services – Citizens Information Services (CISs), MABS and the National Advocacy Service for people with disabilities (NAS) regularly highlight housing difficulties experienced by citizens. The issue of affordability in the private rental sector is a long-standing and ongoing problem for many users of CIB services. The main issues raised by CIS users relate to the Housing Assistance Payment (HAP)¹ and access to social housing generally. Since the onset of Covid-19, these issues have come into sharp focus and reflect central concerns around the availability and affordability of suitable housing options for low-income households. MABS deals on an ongoing basis (including through Abhaile) with people living with mortgage debt whose number has increased as a result of Covid-19. Difficulties experienced by people with disabilities are identified by CISs and by NAS on an ongoing basis. In 2019, for example, housing and accommodation accounted for 50% of NAS representative advocacy cases, including those experiencing or at risk of homelessness.

CIB broadly agrees with the housing objectives set out in the Programme for Government. However, based on feedback from our frontline services, the following additional objectives are identified by CIB that should be included in the Housing for All Action Plan:

- Enable people with disabilities to live independently in the community
- Provide housing provision that supports ageing in place
- Provide additional family-friendly social housing
- Review the current reliance on the private rented sector as the primary long-term social housing option

¹ See [Housing Assistance Payment: The Experience of Citizens Information Services \(CIB\)](#)

- Address the ongoing issue of unsustainable mortgage debt

In prioritising the various objectives, a critical question is how to cater for households whose income is just above levels for state supplementation of rental costs but who are finding it increasingly difficult to access and maintain housing tenure in the private rented sector which for many is the only option available. The challenge is to deal realistically with the twin issues of rapidly rising rents and insufficient supply of housing to rent which is compliant with minimum standards in all areas of the country. Dealing with actual homelessness or a threat to homelessness should evidently be a clear priority in *Housing for All*.

There also needs to be a strong policy commitment in *Housing for All* to the direct provision of social housing via Local Authorities and the not-for-profit sector. This includes realising the potential public land banks available.

The *Housing for All* Action Plan needs to set out realistic targets and timescales and identify resources commensurate with meeting these targets.

4. What are the main obstacles to delivery of housing across tenures (e.g. social, affordable, private rental and private homeownership) and household types (e.g. single person households & families)? What short or long-term actions should be taken to increase the scale and speed of delivery and improve approaches to delivery of housing?

3000 character(s) maximum

The current housing crisis is underpinned by two central issues – difficulty people have in finding suitable affordable accommodation and difficulty in keeping their current home. Difficulties arise for people either because they are struggling to make mortgage payments (home owners) or, they are looking for a home in the rental market and either cannot find one, or cannot afford one, due to scarcity of supply and the high cost of rental accommodation.

There is some evidence from CISs that, notwithstanding the 20% discretion on the limit, HAP thresholds are still too low in some areas. Another major difficulty with HAP reported by CISs and MABS is tenants being obliged to make top-up payments. The latter frequently puts severe financial pressure on low-income households and inevitably causes hardship.

For households with below and on average incomes, there is clearly an affordability issue, most notably in Dublin, as competition from medium and high income households is squeezing them out of the market – this issue applies to both people reliant on state support and others on low income but not entitled to state support.

In the absence of strong delivery of public social housing, the general shortage of private rental accommodation in both urban and rural areas and related spiralling market-driven rents have a strong negative impact on people reliant on social housing. The private rented sector needs substantial reform if it is to be a long-term social and affordable housing option in terms of security of tenure, rent certainty and guarantee of appropriate standards of accommodation. There is somewhat of a contradiction between the reliance on the private rented sector to meet social housing needs and the rent limits that are set by Government for that sector which by its very nature operates on a profit basis related to market rents.

The main obstacles to delivering quality social housing identified by CIB which need to be addressed in the *Housing for All* Action Plan are:

- Inadequate social and affordable housing provision generally
- Ongoing insecurity of tenure for tenants in the private rental sector and consequent risk of homelessness
- Insufficient suitable housing (with supports) to enable people with disabilities to live independently in the community
- People not being supported to 'age in place' due to limited housing options (in terms of size, accessibility and location)
- Difficulties encountered by people in mortgage arrears (exacerbated during Covid-19)
- Unaffordable rents in the private sector
- Over-reliance on HAP to meet social housing needs and the limited stock of affordable private rented accommodation for HAP tenants
- The reliance by many people with disabilities and people with mental health difficulties on the private rented housing sector
- The levels at which HAP rent thresholds are set in different parts of the country (this despite some flexibility on the matter)
- The unwillingness of some landlords to sign up to the HAP scheme
- Difficulties in securing rental accommodation due to delays in processing social housing applications
- The length of time that some tenants spend on social housing waiting lists in some cases between 10 and 15 years

5. What actions should be taken, in order of priority, to ensure that housing is available for all sectors of society, including our ageing population and people with disabilities?

Short-term actions required

- The underlying Whole of Government approach is hugely important, particularly for people who require financial or health and social care supports for daily living. Also, there is an obvious need to include agencies responsible for developing the social, amenities and transport infrastructure in local communities.
- The *Housing for All* Action Plan should ensure full integration of any new National Housing Strategy for People with a Disability.
- There is a need to escalate the direct Local Authority social housing building programme in a strong, focused and proactive manner and as a matter of urgency.
- Additional strategic partnerships between Local Authorities, NGOs and the private sector should be developed.
- There should be provision for further forms of rent regulation and rent certainty to combat the obvious difficulties arising from a free market approach.

- More concerted and urgent action is required to bring vacant properties in all parts of the country into use for residential accommodation purposes.
- More resources should be provided for the inspection of accommodation (private and public) provided under social housing policy.
- There should be continued use of targeted tax incentive to landlords who participate in social and affordable housing schemes with the condition that accommodation meets minimum quality standards.
- Consideration should be given to a stronger regional approach in order to address the different housing challenges in major urban areas, smaller towns and rural areas.
- At Local Authority level, there should be much greater emphasis on including communities, tenants and owners, in design, delivery, and management of social housing – some of this is beginning to happen through the implementation of the National Housing Strategy for People with a Disability.
- Notwithstanding the introduction of statutory instruments amending the eligibility criteria for social housing to include households whose mortgage has been deemed unsustainable by their lender, it would appear some local authorities will not carry out a social housing assessment until a possession order has been granted as they are not deemed to have a need – this matter needs to be addressed.
- More resources should be provided for the Housing Adaptation Grant and the Mobility Aids Grant.

Medium and longer-term

- Housing policy needs to be developed within a human rights framework within which people's right to adequate housing is regarded as a core component of citizenship and social inclusion.
- The private rented sector should be an option of secondary resort for social housing rather than of first resort as is the case at present
- The concept of liveable communities (one with affordable and appropriate housing and supportive community features and services) should be re-visited to include appropriate housing provision for families, people with disabilities and to support ageing in place.
- There should be a policy target of ensuring that no person with a disability or a mental health difficulty should have to rely on the private rented sector for social housing.
- The issue of housing and accommodation for Travellers remains a core outstanding issue which has not been dealt with adequately despite many reports, policies and implementation plans on the matter

6. Do you have any further comments on the development of the Housing for All policy and action plan that you would like to add?

1500 character(s) maximum

The experience of CIB services (CISs, MABS and NAS) refers mainly to matters relating to access to social and affordable housing and people in mortgage arrears as distinct from the broader areas of house building, planning and development. The negative impact of inadequate social housing on the daily lives of users of these services is very significant. Inadequate social housing supply results in people who become homeless being accommodated in inappropriate emergency accommodation and/or living in overcrowded accommodation and, therefore, currently, at a higher risk of exposure to Covid-19. It is noted that the UN Special Rapporteur on the right to adequate housing has stated that 'housing has become the front line defence' against Covid-19.

<https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=25727>.

It is reasonable to suggest that inadequate housing also contributes to the emergence of or compounding of mental health difficulties

Social housing, while highly desirable as a sustainable solution to the accommodation needs of low-income individuals and families, is not currently a viable option for a large section of people due to scarcity of supply. Users of CISs and MABS experience a range of difficulties in accessing social housing, including in the private rented sector because of the HAP requirement that they source the private rented accommodation themselves before applying for HAP.

Many users of CIB services face major challenges in finding accommodation that meets HAP criteria. Many understandably feel that they have been let down by the State. This is seen by some as a derogation of Government responsibility to provide public social housing to those who need it.