Threshold
preventing homelessness

Making Housing Work: Solutions for Everyone

2024 General Election Manifesto

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YEAR 1 ACTIONS

- Create a Strategy for the Private Rental Sector
- Stop homelessness before it starts by creating a Homelessness Prevention Plan
- To support a Homeless Prevention Plan, allocate 20% of all homelessness expenditure to a Dedicated Homeless Prevention Budget
- Create a publicly available rent register and a system of reference rents
- Reintroduce homes into the long-term rental market by establishing a Short-Term Tourist Lettings Register

YEAR 2 ACTIONS

- Retain the stock of social housing by ending the Tenant Purchase
- Protect renters at risk of experiencing energy proverty by making the Warmer Home Scheme available for the homes of HAP tenants
- Ensure renters get their deposit back at the end of their tenancy by creating a Deposit Protection Scheme
- Review Housing Assistance Payment (HAP) rates to ensure affordability and greater access to rental properties
- Relevant departments to review legislation regarding Garda and RTB involvement in addressing illegal evictions

YEAR 3&4 ACTIONS

- Create a Rent Arrears Scheme to keep renters in their home and ensure landlords are not left out of pocket
- Ensure rental homes meet the minimum standards by creating a standardised certification system, Fit for Rent, across the Local Authorities
- Increase social and cost-rental housing to 20% of all housing stock

LONG-TERM ACTIONS

- Hold a referendum on the right to housing

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Threshold

Founded in 1978, Threshold is a national housing charity that operates a National Freephone Helpline and advice centres in Dublin, Cork, Galway and Limerick. We are the only specialist advice and advocacy service for tenants in Ireland. Each year, Threshold supports approximately 20,000 households living in the private rental sector.

Threshold's General Election Manifesto

As the leading organisation working with private renters, Threshold is uniquely placed to observe the most pressing matters for those who rent their homes. Addressing the challenges faced by private renters is crucial for creating an equitable and sustainable housing system that ensures everyone has access to appropriate housing. A safe, secure and affordable home should not be out of reach for renters in Ireland; rather, it should be a right.

Threshold supports the important work of the Housing Commission, and their recommendations set out in the Report of the Housing Commission. Threshold asks the forthcoming government to utilise the work done by the Commission to create a long-term housing plan, akin to Sláintecare, with dedicated multi-annual funding, as has been done in Finland. This is essential remove the politics from housing so that it can be treated as a social good and as an essential part of societal infrastructure. This is the overarching ask of Threshold in this election. We press upon candidates and future members of the Oireachtas to commit to the full implementation of the Housing Commission's recommendations.

In this manifesto, Threshold puts forward measures that are necessary to support renters and improve access to secure housing. These measures aim to provide solutions to some of the systemic problems of the Irish housing system, specifically the lack of affordability and security in the private rental sector. With rising rents and limited security of tenure, private renters often struggle to find suitable housing, placing them at risk of homelessness, financial vulnerability and energy poverty. The proposals set out in this document aim to alleviate the financial burden carried by renters and safeguard against homelessness, ensuring everyone can access a home where they can live with dignity.

By treating the private rental sector as a legitimate tenure, the Irish government can ensure the security and dignity of private renters. Moreover, a well-regulated and stable private rental sector can attract long-term investment, which can foster economic growth and enhance community cohesion.

Priority Actions: Year 1

Strategy for the Private Rental Sector

On foot of the Government's *Private Rental Sector Review*,[1] Threshold calls on the next government to devise a strategy for the private rental sector.

While the sector has been central to the plans of previous governments – which have launched initiatives such as the Housing Assistance Payment (HAP) scheme – there has been a lack of vision or long-term planning for the sector as a key tenure in Ireland's housing landscape. This has resulted in a sector that is unpredictable and unable to respond to what is being demanded of it.

The availability of more accurate data from the Residential Tenancies Board (RTB) and the Central Statistics Office will be key to informing this plan, alongside consultation with the main stakeholders. A well-rounded strategy will ensure a balanced and sustainable rental market that benefits all.

In addition, Threshold recommends a review and consolidation of the Residential Tenancies Acts to ensure the legislation is clear and accessible to tenants and landlords. The 2004 Act has been amended on numerous occasions and is now considerably more complex than when it was first enacted. As a result, tenants and landlords can find the Act difficult to understand, with specialist advice often required to navigate its complexities.

Homelessness Prevention Plan

With the ongoing increase in homelessness, a plan to prevent homelessness is long overdue. While there have been a number of homelessness policies introduced over the years, these have focussed almost exclusively on "treating" homelessness after it occurs rather than preventing homelessness. When policies do consider homelessness prevention, it is typically restricted to "at risk" groups, such as people leaving the care system or experiencing addiction issues. Often, no attention is given to those who are facing eviction or are unable to secure a home.

The focus on the need to prevent homelessness in the first instance is set out front and centre in the 2023-2025 Youth Homelessness Strategy.[2] This is a positive step in the right direction and such an approach must be applied to wider homeless policies going forward.

Threshold believes there is a real opportunity to reduce and end homelessness by placing an obligation on Local Authorities to include homelessness prevention in their plans and protocols. For example, in 2014, the Welsh assembly introduced legislative measures that placed an obligation on local housing authorities to prevent homelessness.[3] This has helped local authorities to embrace a person-centred homelessness strategy, which has resulted in an improved service response to tackling homelessness. The official statistics illustrate this, with almost two-thirds of in-situ households being able to avoid homelessness

1 Department of Housing, Local Government and Heritage. "Private Rental Sector Review". 2024. https://www.gov.ie/pdf/?file=https://assets.gov.ie/299013/b26f8fd6-4b0c-4494-9a27-6f0ae29a5ee0.pdf#page=null (Accessed 11/10/24)
2 Government of Ireland. "Youth Homelessness Strategy 2023-2025". 2023. https://www.gov.ie/pdf/?file=https://assets.gov.ie/239255/99c987df-4439-4bc2-8730-be614eae1e2e.pdf#page=null (Accessed on 16/10/24)
3 National Assembly of Wales. "Housing (Wales) Act 2014". Legislation.gov.uk. https://www.legislation.gov.uk/anaw/2014/7/contents/enacted (Accessed 4/10/24)

and two-fifths of homeless households able to exit homelessness.[4] In addition, analysis of the Welsh homelessness strategy reports that there is a high level of informal activity taking place to resolve issues that could result in homelessness. This is in line with the spirit of the Housing (Wales) Act, which stresses a person-centred approach and collaboration between services. For example, Shelter Cymru has worked with several local housing authorities to develop protocols for their homelessness casework.[5]

Since the Act's publication in 2014, the Welsh Government has published a White Paper on ending homelessness in Wales.[6] The White Paper covers five main themes, which are: the reform of existing legislation; the role of public services in preventing homelessness; targeted proposals to prevent homelessness for those disproportionately affected; access to housing; and implementation.

Evidence

To support such a strategy, Threshold is asking for increased investment in evidence-based homelessness prevention initiatives to prevent homelessness from occurring in the first instance. This requires research into the factors which result in homelessness occurring as well as those which prevent it from occurring. If we do not understand the problem, we cannot adequately address it, let alone resolve it. While the causes of homelessness are captured in the Pathway Accommodation and Support System (PASS), this data does not adequately reflect nor capture the various forces that have resulted in homelessness occurring.

Previous strategies have used an oversimplified typology of risk and personal factors to predict homelessness and have referred to "the root causes" of homelessness without further explanation or elaboration on what these might be.[7] By gaining a deeper understanding of the causes of homelessness and the factors that prevent it from occurring, services – whether community, statutory or voluntary – will be able to intervene at an earlier stage to prevent homelessness from occurring.

Definitions

The Housing Act 1988 provides a definition of homelessness. There is a need to update this definition and to include a separate definition of the term 'at risk of homelessness.' These definitions need to be underpinned and framed by the adoption of modern and less prescriptive criteria that are broad enough to cater for a diverse range of households in need of housing assistance. Adopting these definitions will be the starting point to creating inclusive and progressive homelessness legislation. Such definitions are crucial in responding to hidden homelessness. Expanding the definition to recognise couch-surfers, people staying with families and those in emergency accommodation requires that a much broader range of services be provided.

Threshold favours adopting the European Typology of Homelessness (ETHOS framework).[8] This typology was developed by the Fédération Européenne des

4 Ahmed, A., Wilding, M., Gibbons, A., Jones, K., Rogers, M. and Madoc-Jones, I. "Post-implementation evaluation of Part 2 of the Housing Act (Wales) 2014". 2018. Welsh Government.
5 Shelter Cymru. "Implementing the Housing (Wales) Act 2014: the role of homelessness reviews and litigation". 2020. https://sheltercymru.org.uk/wp-content/uploads/2020/06/Homelessness-Reviews-Litigation-Report-FINAL.pdf (Accessed on 03/10/24)
6 Miller Research Evaluation Consulting. "Consultation analysis for the White Paper on Ending Homelessness in Wales: Summary of responses to the Consultation on the White Paper for Ending Homelessness in Wales". 2024. Welsh Government. https://www.gov.wales/sites/default/files/consultations/2024-04/analysis-for-the-white-paper-on-ending-homelessness-in-wales_1.pdf (Accessed: 03/10/24)
7 Department of the Environment and Local Government. "Homelessness: an integrated strategy". 2000. https://www.drugsandalcohol.ie/5563/1/Dept_ELG_Homelessness_An_Integrated_Strategy%5B1%5D.pdf. (Accessed on 29/07/24)Department of the Environment, Community and Local Government. "Housing Policy Statement." 2011.
8 FEANTSA. "European Typology of Homelessness and Housing Exclusion". Feantsa.org. https://www.feantsa.org/download/ethos2484215748748239888.pdf (Accessed on 26/07/24)

Associations Nationales Travaillant avec les Sans-Abri (FEANTSA) as a means of improving understanding and measurement of homelessness in Europe. Adopting this typology would allow Irish policymakers to see the full picture of homelessness and housing need in Ireland, which would inform homelessness prevention services, homeless services and housing delivery. For example, the scale of 'hidden homelessness' in Ireland is unknown; these are individuals or families who are not recorded in official statistics, as they are not residing in Section 10 funded accommodation.

Dedicated Homelessness Prevention Budget

To support this plan to prevent homelessness, Threshold is calling on the next government to allocate a yearly budget specifically for homelessness prevention, amounting to 20% of all homelessness expenditure. In Ireland, everyone should be able to live with dignity in a home that is safe and secure. Living without this basic human right, either in emergency or insecure accommodation, infringes on a person's rights and undermines their ability to fully participate in society and fulfil their potential.

The Irish Government has demonstrated its commitment to ending homelessness by 2030 by signing the Lisbon Declaration. It has also established the National Homeless Action Committee and has promoted a range of homelessness prevention services. In Threshold's view, the next logical step is to shift the focus from expenditure on emergency accommodation to homelessness prevention, and from policies which manage homelessness to policies which stop homelessness from occurring.

In 2023, 84% of all Section 10 funding was spent on emergency accommodation, amounting to approximately €286.3 million. In contrast, only 5.5% or €18.9 million was spent on homelessness prevention, such as tenancy sustainment and resettlement supports (of which only a portion stopped homelessness from occurring in the first instance).[9] A total of €303 million has been allocated to homelessness services in Budget 2025.

A homeless prevention budget must fund services that stop homelessness, either by assisting people to stay in their homes or by supporting people to move to another home. In addition to preventing the trauma of homelessness, investment in homeless prevention would be a cost-saving measure as it would reduce the need for emergency accommodation and associated services. This is an example of where the state will need to 'invest to save,' by increasing commitments and spending so that the medium to longer-term poverty related savings can be realised.[10]

The most effective way of stopping homelessness is by preventing it from occurring in the first instance. Threshold demonstrates this year in, year out.

Rent Register and Reference Rents

Threshold supports the Housing Commission's recommendation to establish a "publicly available register of rents being charged."[11] In conjunction with this, the Commission recommends establishing a system of 'Reference Rents.' Threshold urges the next government to take the necessary steps to implement these recommendations in place of the Rent Pressure Zones (RPZs), which are to come to an end in 2025.

9 Department of Housing, Local Government and Heritage. "Homeless Data: Local Authority Regional Financial Reports". Gov.ie. https://www.gov.ie/en/collection/80ea8-homelessness-data/#local-authority-regional-financial-reports (Accessed on 26/07/24)

10 Collins, M. 2020. "The Hidden Cost of Poverty: estimating the public service cost of poverty in Ireland". Society of St Vincent De Paul.

11 Housing Commission. "Report of The Housing Commission". 2024. https://www.gov.ie/pdf/?file=https://assets.gov.ie/294018/e1aae1ed-07c4-473d-811e-3426756321ee.pdf (Accessed on 4/10/24)

Dwelling Specific Rent Register

While the RTB now have greater powers to enforce rules regarding the setting and increasing of rent, tenants do not have the necessary information to confirm that landlords are adhering to these rules. Without access to this information, new tenants may pay more than the lawfully permitted rent, meaning rents are *de facto* decontrolled between tenancies. A Dwelling Specific Rent Register is needed to overcome this.

The RTB *Rent Index* reports show that new tenants are more likely to pay higher rents than existing or sitting tenants.[12] While the average rent increase for sitting tenants is 1.3% per year, new tenants face average increases of 5.9% when they move into a new rental property. Additionally, research carried out on behalf of the RTB indicates that many landlords, as well as tenants, are not aware of RPZ regulations.[13]

Regarding residential property sales, all prices are now available on the Residential Property Price Register. This step was taken to inform the housing market and ensure it functions effectively. The Residential Property Price Register provides a blueprint from which the Rent Register could be developed. Establishing the Rent Register will provide the same visibility and transparency for the private rental sector. With annual registration now in place, the data is available to make this information publicly available.

Reference Rents

The Housing Commission recommends replacing the existing system of rent setting with one that pegs rent increases to a reference rent for a local dwelling of similar quality.[14] Threshold is in favour of this proposal, as it would assist in setting a factually based "market rent," and ensure that tenants are being charged a fair rent for their home.

Such a system operates in Germany, where initial rents can be market-determined under a rent ceiling that acts as a local rent reference. This is known as Miet Spiegel ('rent mirror') and provides a database of local reference rents in the private rental market. Most major towns and cities across Germany have a database of reference rents in place. Local reference rents are based on location and comparable building-quality characteristics.

If adopted in Ireland, such a system could provide protection for those living outside of RPZs and potentially create a pathway to transition away from RPZ regulations. As RPZs are set expire at the end of 2025, it is necessary to devise a new system of rent regulation that will ensure long-term rent stability and affordability.

Short-term Lettings

Threshold first highlighted the impact of short-term lets on the long-term rental sector in 2018. We are keen to see the short-term letting register and associated requirements, as set out in the General Scheme of the Registration of Short-Term Tourist Letting Bill, put in place. Threshold has made some observations on the General Scheme, which was published in 2022.

Threshold's hope is that the legislation, when enacted, will result in the reintroduction of a considerable number of homes to long-term residential use. While the progression of the legislation was initially delayed by the 'standstill' procedure put in place by the EU, it is necessary for the next Government to pursue it and ensure its commencement.

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12 Slaymaker, R., Devane, K., and Kren, J. "The RTB Rent Index, Q1 2024: Indices Report". ESRI. 2024. https://www.esri.ie/publications/the-rtb-rent-index-q1-2024

13 Amarach Research. "RTB Small Landlords Report 1-2 Properties". 2023. https://www.rtb.ie/images/uploads/forms/RTB_Small_Landlord_Survey_2023_Report_13.12.23.V1_.pdf (Accessed: 02/10/24)
Amárach Research. "RTB Tenants Research Report". 2023. Available at: https://www.rtb.ie/images/uploads/forms/RTB_Tenants_Research_Survey_2023_Report_13.12.23.V1_.pdf (Accessed: 02/10/24)

14 Housing Commission. "Report of The Housing Commission". 2024. https://assets.gov.ie/294018/e1aae1ed-07c4-473d-811e-3426756321ee.pdf (Accessed on 4/10/24)

Short-term Actions: Year 2

Deposit Protection Scheme

The need for a Deposit Protection Scheme continues, and Threshold reiterates its call for its establishment.

The Housing Agency has completed a review of deposit protection schemes operating in other jurisdictions. If the current Government fails to take the necessary action to deliver the scheme on foot of this work, then the next government must take action to ensure the full delivery and operation of the scheme within the second year of its term. The 230,000 plus households who rent their homes deserve for this long-awaited scheme to be delivered.

Threshold proposes the establishment of a 'custodial' model, delivered by an independent provider that is selected via a tendering process. There are several experienced providers delivering such schemes in Northern Ireland, England, Wales and Scotland, some of which operate the scheme on a limited-profit basis. Threshold believes a similar scheme can be adopted in Ireland but would require a revision of the uncommenced 2015 legislation.

It would not be necessary for the RTB to operate the scheme directly, as existing providers have the requisite platforms, skills and experience to provide this service. However, members of the RTB and the Department of Housing could sit on a governance board to oversee the scheme. As rental legislation in Ireland does not differ significantly from Scotland or Northern Ireland, these models could be easily replicated or adapted for the Irish context. Threshold has made submissions to the Department on how such a scheme could interact with the RTB dispute-resolution service and how it could operate on a limited or not-for-profit basis.

Review the Housing Assistance Payment (HAP) Rates

A key recommendation from the Housing Commission's report is for the Government to review the maximum subsidies available under HAP to ensure they reflect current rental asking prices.[15] The report further stresses that Local Authority payments should be sufficient for HAP tenants to rent a property in their local area. This is to ensure that HAP tenants are not required to 'top up' their rent unless they choose to rent a property at the higher end of the market.

Threshold supports these recommendations and those of the Economic and Social Research Institute (ESRI) to link HAP rates to the rents of new tenancies in the relevant Local Authority.[16] This should ensure affordability and greater access to rental properties for those reliant on this payment. As highlighted in the ESRI's report, only a small proportion of homes advertised for rent fall within HAP limits. With HAP providing important, short-term housing support, it is essential that the payment is sufficient to allow renters to secure a home in their local area. As such, it will be necessary to review HAP on an annual basis.

Energy Standards

Threshold supports the proposals of the Irish Green Building Council and Friends of the Earth

15 Housing Commission. "Report of The Housing Commission". 2024. https://assets.gov.ie/294018/e1aae1ed-07c4-473d-811e-3426756321ee.pdf (Accessed on 4/10/24)
16 Doolan, M., Roantree, B., and Slaymaker, R. "Low-income renters and housing supports". ESRI Research Series 141. 2022. https://doi.org/10.26504/rs141

regarding the Free Energy Upgrade Programme (Warmer Home Scheme) available through the Sustainable Energy Authority of Ireland (SEAI). The two organisations recommend that the criteria for this programme is regularly reviewed and updated to ensure inclusivity and that the most vulnerable groups in society have access to it.[17]

Currently, renters in the private rental market are unable to avail of the free energy upgrade scheme, as it is only available to certain property owners. Threshold recommends that the Government open this scheme to landlords in the private rental sector who have tenants receiving HAP. The scheme should only be made available to landlords who agree to provide a long-term lease to the HAP tenant. The length of each lease could be scaled, depending on the level of renovation. A clawback mechanism will be necessary in instances where a landlord does not honour this agreement.

Illegal Evictions

Threshold is calling for cooperation between the future Minister for Housing, Local Government and Heritage and the future Minister for Justice to review the existing legislation that gives powers to the Gardaí when called to intervene in an illegal eviction.

In tandem with this, we recommend a review of the RTB's role in responding to illegal evictions. The RTB should also implement the recommendations set out in the report on the Berkely Road illegal evictions, published in 2022.[18] Unfortunately, there continue to be instances of illegal eviction, and since 2022, Threshold has been contacted by approximately 400 renters who were illegally evicted by their landlord. This is an incredibly stressful situation for anyone to find themselves in. There is often little help available to a renter when this occurs, with many turning to the Gardaí for assistance. Threshold believes that the Gardaí have an essential role in maintaining peace and protecting vulnerable parties in these situations.

End the Tenant Purchase Scheme

In order to maintain the State's social housing stock, it will be necessary to bring the Tenant Purchase Scheme to an end. Selling this stock has reduced the number of council homes available to rent and has contributed to the residualisation of the social housing sector.[19]

Under the Tenant Purchase Scheme, council properties are sold at a discounted market price, varying between 40% and 60%. Although benefitting a tenant, this scheme limits each Local Authority's ability to replenish its housing stock in the long-term. The continuation of this scheme will undermine any progress made to realising a unitary housing system – and it is terrible value for taxpayers' money.

In addition, the sale of social housings units has undermined the differential rent model. Before the sale of the properties, the rental model meant that better-off tenants of social housing would effectively subsidise those who were not as well off. Many of the more well-off tenants purchased their properties, leading to a reduction in the rental income from the social housing stock. This has affected the ability of housing authorities to maintain and improve their remaining housing stock.

17 Friends of the Earth & Irish Green Building Council. "Bridging the Gap – Between Energy Poverty and Energy Renovation". 2024. https://www.friendsoftheearth.ie/assets/files/pdf/igbc_final_report_proof_04.pdf (Accessed on 25/07/24)

18 Residential Tenancies Board. "Report to the Minister of Department of Housing, Local Government and Heritage on the Berkeley Road case and illegal evictions in the private rental sector". 2022. https://www.documentcloud.org/documents/23828711-report-to-minister-on-berkeley-road-case-and-illegal-evictions-final (Accessed on 18/09/24)

19 Norris, M. and Hayden, A. "The Future of Council Housing An analysis of the financial sustainability of local authority provided social housing". Community Foundation of Ireland. 2018.

Medium-term Actions: Years 3 and 4

Rent Arrears Scheme

Threshold is calling for the investment of €20 million in a Rent Arrears Scheme to help private renters remain in their homes if they experience financial difficulties. A fund of this size could assist approximately 10,000 private renters. With average monthly rents now over €1,600,[20] even just one month of rent arrears can represent a significant financial burden on both the renter and the landlord. As a caveat, it is not proposed that the scheme be utilised to assist those who engage in the wilful non-payment of rent.

Private renters are the only group who face losing their home in a matter of weeks if they fall behind on payments, often with limited support or guidance. Meanwhile, the Mortgage Arrears Resolution Process (MARP) is in place to support owner-occupiers in arrears, or even pre-arrears, as is the Mortgage to Rent Scheme. Unlike private tenants, Local Authority tenants can engage in repayment plans over extended periods. In addition, Local Authorities or Approved Housing Bodies tenants often have hardship clauses written into their contracts.

There is a need for this safety net, as private renters are at greater risk of poverty, material deprivation and social exclusion than those in other housing tenures. They are also more likely than owner-occupiers to be burdened by debt and have utility arrears.[21]

Threshold is calling for a rent arrears scheme that would provide:

i. Low or no-interest loans to renters to pay off all or part of their arrears, and
ii. Lump-sum payments to landlords to pay all or part of their tenant's arrears.

It is proposed that such renters would be able to avail of this fund by applying to their Local Authority. Threshold or the Money Advice and Budgeting Service (MABS) would assist with assessing if the tenant is eligible for funding and, depending on their circumstances, arrange a suitable repayment plan.

Putting such measures in place will be more effective and less costly to the State than allowing tenants to be evicted for rent arrears and put at risk of homelessness. It will prevent the potential uprooting of households, which has serious impacts on both family and community cohesion. At the same time, such a Rent Arrears Scheme would protect landlords, who may be placed in adverse financial circumstances, or even mortgage arrears, if a tenant is unable to pay their rent.

To ensure its effectiveness, the Scheme must be underpinned by changes to the Residential Tenancies Acts. These changes must include:

- An increase in the warning notice period from 28 to 90 days

20 Slaymaker, R., Devane, K., and Kren, J. "The RTB Rent Index, Q1 2024: Indices Report". ESRI. 2024. https://www.esri.ie/publications/the-rtb-rent-index-q1-2024 (Accessed 4/10/24)
21 Central Statistics Office. "Survey on Income and Living Conditions (SILC) 2023 – Poverty". 2024. https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2023/poverty/ (Accessed 4/10/24)
TASC. "Exploring Household Debt in Ireland". 2020. https://www.tasc.ie/assets/files/pdf/household_dept_report_final_3320.pdf (Accessed 4/10/24)
ESRI. "Poverty, Income inequality and living standards in Ireland: fourth annual report". 2024. https://www.esri.ie/system/files/publications/JR7_1.pdf (Accessed 4/10/24)

- A halting of evictions for rent arrears where an application to the Rent Arrears Scheme is pending or approved, and/or
- A pause on evictions for rent arrears where an application to the Workplace Relations Commission (WRC) to challenge a landlord's refusal to accept the HAP or Rent Supplement is pending or where the WRC has found in the tenant's favour

With over four decades of assisting private renters, Threshold knows that rent arrears often accrue for reasons outside of a person's control. These reasons include job loss; family or relationship breakdown; illness; payment processing delays or disruptions to social welfare payments; rent increases; delays with the administration and payment of HAP; or a landlord's refusal to accept HAP or Rent Supplement.

These are all temporary disruptive factors outside of the tenant's control and are events that many of us will, unfortunately, experience at some point in our lives. As such, it is unjust that such events can result in the loss of a home and potential homelessness.

Fit for Rent

Threshold is proposing Fit for Rent, a certification system to ensure that private rental homes meet existing minimum standards. This would involve the roll-out of a standardised inspection and assessment system across all Local Authorities.

Under this scheme, the landlord would be provided with a compliance certificate once the property passes inspection. The landlord would be required to submit this certificate to the RTB when registering a tenancy at that property. Threshold believes that such a standardised inspection and assessment system would result in greater compliance with the existing minimum standards across the board.

The introduction of this certification system would, in time, ensure that all properties are up to standard before tenants move in. Currently, inspections processes vary from one Local Authority to another, and certification is limited to purely 'pass-or-fail' results. Threshold's Fit for Rent proposal moves away from the pass-fail system to a more nuanced traffic-light system.

Over time, Fit for Rent should become a cost-saving measure, as it will reduce the number of cases brought to the RTB and facilitate more targeted inspections by Local Authorities. It will also provide more time to Local Authority inspectors, who can work with those landlords whose properties are in significant need of improvement.

Long-term Actions

Increase Social and Cost-Rental Housing Stock to 20% of National Stock

A core recommendation from the Housing Commission's 2024 report is that social and cost-rental housing be increased to 20% of the national stock. This would allow it to become the main source of rented accommodation for lower- and middle-income households.[22] This is a decades long commitment, and the work to achieve this goal must start now. The State can pursue this through active policy intervention, and, given the clear demand for additional non-market housing, this is an approach recommended by Threshold.

Providing cost-rental, as well as social housing, to a larger proportion of the population will provide more affordable and secure housing while also creating positive competition with the for-profit sector. This would result in people having greater choice when it comes to finding a home – choice that many do not currently have. Reaching the 20% target can bring about affordability for renters by having a moderating effect on rents in the private rental sector.

This will result in a different housing system, known as a Unitary Housing System, or an integrated market. Such a housing system has the potential to improve access, affordability and security across all tenures. This change would reduce the State's reliance on the private rental sector to provide social housing via the HAP scheme and reduce its accompanying costs. While HAP is a welcome improvement on rent supplement, it does not provide the security of tenure that comes with a social or cost-rental tenancy. In addition, the ever-increasing cost of HAP (€537 million in 2023)[23] leaves the State exposed to market forces, and this is a vulnerable position for the exchequer.

Constitutional Change

Threshold is calling on the next Government to hold a constitutional referendum on the right to housing. By holding such a referendum, the people of Ireland would be given the opportunity to give clear direction to all future governments on the value of home. Should the referendum pass, it would also confirm that the Government has an indisputable role in ensuring all people have access to a safe, secure and affordable home.

The Constitution is a statement of fundamental values that the people of Ireland believe in. It shapes and underscores all Government policy and legislation. Without a right to housing in the Irish Constitution, there is no constitutional duty on the Government to ensure access to adequate housing.

22 Housing Commission. "Report of The Housing Commission".2024. https://www.gov.ie/pdf/?file=https://assets.gov.ie/294018/e1aae1ed-07c4-473d-811e-3426756321ee.pdf (Accessed on 4/10/24)
23 Department of Housing, Local Government and Heritage. "HAP Performance Indicators - 2023". 2024. https://assets.gov.ie/302623/394692b5-c9e8-4dd0-9284-96299b34cdb3.pdf (Accessed on 21/08/24)

Threshold
preventing homelessness

Revenue (Charities Unit) (CHY): 6279
Charities Regulatory Authority (CRA): 200110301

National Office and Eastern Regional Office
First Floor 25-28 Strand Street Great, Dublin 1, D01 XP04

Southern Regional Office
22 South Mall, Cork, T12 C2YN

Western Regional Offices
5 Prospect Hill, Galway, H91 HC1H
Unit 2-4 Howleys Court, Steamboat Quay, Dock Road,
Limerick, V94 P8C0

National Freephone Helpline:
1800 454 454
9am to 9pm Monday to Friday

advice@threshold.ie
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