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*Submission in Relation to*

*Framework Statutory Homeless Action Plan for the Dublin*  
*Region 2014–2016*

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## **Introduction**

The Jesuit Centre for Faith and Justice (JCFJ) welcomes the opportunity to contribute its views in relation to the development of the *Framework Statutory Homeless Action Plan for the Dublin Region 2014–2016*.

The new Statutory Framework follows earlier strategy documents on addressing homelessness in Dublin. All of these have had as core objectives the ending of long-term homelessness and the elimination of the need for any person to sleep rough. Despite the allocation of additional resources for homeless services, and improvements in some aspects of service provision, these core objectives are far from being achieved, a reality which is starkly illustrated by the fact that the target date for ending long-term homelessness was moved from 2010, as originally envisaged, to 2016.

The planned new Action Plan for the Dublin Region needs to take account of the reality and implications of the failures of previous plans. It needs to adopt a radical approach, with measures that are commensurate both with the scale of the problem of homelessness in the Region and the high aspirations outlined in official policy statements on addressing homelessness.

JCFJ suggests that the provisions of the Action Plan 2014–2016 should be based on a recognition that everyone has a right to housing, a right arising from the inherent dignity and equality of all persons. This right was acknowledged by the Irish State when, in 1989, it ratified the United Nations' International Covenant on Economic and Social Rights, Article 11 of which recognises '... the right of everyone to an adequate standard of living ... including food, clothing and housing ...'.<sup>1</sup> The UN Committee on Economic and Social Rights, which is responsible for monitoring the implementation of the Covenant, has stated clearly that the right to housing is not to be understood in a limited or minimalist manner, which might equate 'housing' with shelter that merely provides a roof over one's head. Rather, the Committee says, the right to housing 'should be seen as the right to live somewhere in security, peace and dignity'. It stresses that the right to adequate housing applies to everyone, 'regardless of age, economic status, group or other affiliation', and highlights the fact that the realisation of the right to housing is 'of central importance for the enjoyment of all economic, social and cultural rights'.<sup>2</sup>

## **Scale of the Challenge**

Table 1 below sets out the data on homelessness from the Housing Needs Assessment (HNA) carried out in March 2011 and the Census of Population of April 2011. It shows the significant degree to which the problem of homelessness is concentrated in the Dublin region – 46 per cent of all the homeless households included in the Housing Needs Assessment were in the four Dublin local authority areas, as were 60 per cent of all homeless households counted in the April 2011 Census.

**Table 1: Homeless Households, Housing Needs Assessment 2011 and Census 2011**

<b>Numbers of Homeless Households</b>	<b>HNA National</b>	<b>HNA Dublin</b>	<b>Census 2011 National</b>	<b>Census 2011 Dublin</b>
Total	2,348	1,089	3,808	2,375

Census 2011 also provides data on the current living arrangement for those counted as homeless but only national data are given. As Table 2 shows, 43 per cent of homeless households were living in emergency accommodation, and 26 per cent were in ‘long term’ homeless accommodation.

**Table 2: Homeless Households, Census of Population 2011**

<b>Type of Accommodation</b>	<b>Number of Homeless Households</b>	<b>Percentage of Homeless Households</b>
Emergency Accommodation	1,648	43.3%
Transitional	555	14.6%
Long Term	992	26%
Mixed	344	9%
Unknown	206	5.4%
Sleeping Rough	64	1.7%
Total	3,808	

The Dublin ‘Rough Sleepers Count’ for Winter 2012 showed that there were 87 people sleeping outdoors in November 2012.<sup>3</sup> This figure does not include self-reported rough sleepers using a voluntary breakfast service on the morning following the Rough Sleeper Count (such self-reported data has been included in the Count since 2009). There are, however, serious reservations about the comprehensiveness of the Rough Sleeper Count, since it does not include, for example, people squatting in empty houses or sleeping in public parks or along canal banks.

### **Current National Housing and Homelessness Policies**

The *Framework Statutory Homeless Action Plan for the Dublin Region 2014–2016* will be developed against the backdrop of the Government’s current national housing policies.

The *Housing Policy Statement*, issued in June 2011, includes a promise to deliver ‘more and better outcomes’ for vulnerable and disadvantaged households, and signals the Government’s commitment to a housing-led approach (also referred to as a ‘housing first’ approach) to meeting the needs of people who are homeless.<sup>4</sup>

The *Homeless Policy Statement*, issued in February 2013, affirms the Government's commitment to ending long-term homelessness and the need to sleep rough, and to moving away from expensive emergency or shelter-type accommodation.<sup>5</sup> It says that 'the primary purpose' of the Policy Statement is 'to make explicit' the Government's commitment to the policy principle of a 'housing-led' approach to addressing homelessness.

*This Government's policy on homelessness places the rapid provision of appropriate accommodation, with support as needed to ensure sustainable tenancies, as the key solution to ending homelessness.*

JCFJ welcomes and supports the commitment in the Strategy documents to ending long-term homelessness, as well as the adoption of a 'housing-led' approach to achieve this. This approach implies that people who are homeless will have access to *affordable, appropriate and secure housing* without undue delay. In the context of the Dublin Region Action Plan to address homelessness, for example, it would imply that individuals and families who became homeless would be rapidly (preferably within days, and at a maximum within eight weeks) provided with secure suitable accommodation. If required, they would also be provided with additional supports.

### **Laudable Goals – Failed Policy Measures**

JCFJ is extremely concerned that the laudable goals of national homelessness policy, and the adoption of a 'housing-led' approach to achieving them, will be undermined by the extent to which official housing policy has come to rely on the private rented sector to meet the needs of people, including people who are homeless, qualifying for social housing.

Overall, this policy has proven to be a failure, as is evidenced by the number of people in emergency accommodation, and even more starkly by instances where people cannot even access such accommodation because current residents have not been able to move on to long-term housing.

At a broader level, the failure is evidenced by the huge increase in the number of people on housing waiting lists, which has risen from 56,249 in 2008 to 98,318 in 2011, an increase of 71 per cent.<sup>6</sup> As Table 3 shows, however, the growth in waiting lists is not just a phenomenon of the period of recession since 2008: overall, the number of households on waiting lists showed an increase of **258.5 per cent** between 1996 and 2011 (from rising from 27,427 in 1996 to 98,318 in 2011).

In the Dublin Region, the number of households assessed as being in need of housing increased by almost by 9,572 between 1996 and 2008 (from 3,966 to 13,538), and by a further 11,487 between 2008 and 2011, reaching 25,025, which is an increase of **282.4 per cent** since 1996. In 2011, households on waiting lists in the Dublin Region represented **25 per cent** of all such households in the country.

**Table 3: Numbers of Households on Housing Waiting Lists, 1996 to 2011**

<b>Area</b>	<b>1996</b>	<b>2002</b>	<b>2008</b>	<b>2011</b>	<b>Increase 1996–2011</b>	<b>% Increase 1996–2011</b>
Dún Laoghaire Rathdown	1,209	2,118	2,461	3,909	2,700	223.3%
Fingal	666	1,769	1,931	5,003	4,337	651.2%
South Dublin	702	3,817	4,259	8,022	7,320	1,042.7%
Dublin City Council	3,966	6,993	4,885	8,091	4,125	104%
<b>Total Dublin Region</b>	<b>6,543</b>	<b>14,697</b>	<b>13,536</b>	<b>25,025</b>	<b>18,482</b>	<b>282.4%</b>
National Total	27,427	48,413	56,249	98,318	70,891	258.5%

### *A Flawed Approach*

A reliance on the private rented sector as a way of providing a ‘housing-led’ response to homelessness is a deeply flawed approach for a whole set of reasons:

*Exclusion of tenants dependent on rent allowance:* a considerable number of landlords will simply not accept tenants who are dependent on rent allowance, as invariably the overwhelming majority of people who have been homeless will be.

*Gap between rent allowance rates and rent demanded:* rent allowance has been structured in such a way that in many cases it is insufficient to meet the rent of even the most basic accommodation – this problem is, of course, most acute in the Dublin Region, where demand for rented properties is at its greatest, and where rents are the highest in the country.

In recent years, the ‘maximum’ rent payable in respect of accommodation rented by a tenant relying on rent allowance has been reduced significantly and the amount which the tenant must meet from his or her own resources has been increased. The effect of the former is to drive tenants into the cheapest accommodation, which is most likely of poor-quality; the effect of the latter is reduction in disposable income, and with it an increased risk of falling into extreme poverty, of becoming indebted, and of falling behind in rent payments and ultimately of being evicted.

The rationale that was put forward for the restrictions on rent allowance was that that rents had decreased, and so tenants should be able to negotiate lower rents with landlords. What has been happening in practice, as is widely known by people working in voluntary sector homeless services, and presumably by the statutory authorities, is that landlords provide ‘confirmation’ that the rent is within the limit allowed, and then negotiate a different, higher, rent with the tenant. The tenant often has no option but to go along with this ‘arrangement’, even though it

means he or she is paying a higher portion of their limited social welfare income on rent. Such arrangements also, of course, mean that part of rent received is not declared for income tax purposes.

The problem of the ‘mismatch’ between rent allowance and prevailing rental levels is already intensifying in the Dublin region, as rental levels generally are once more rising. The Private Residential Tenancies Board (PRTB) Rent Index, published in April 2013, shows that since mid-2011 there has been a reversal of the downward trend in rental levels in Dublin which began in early 2008, so that ‘by the end of 2012 rents in Dublin had increased by close to 4 per cent’.<sup>7</sup> Meanwhile, data published by DAFT.ie show that rents rose slightly in Dublin in 2011 and much more significantly in 2012, with the result that, by the end of 2012, rents in Dublin city had risen by 6.4 per cent since 2011, and rents in all other parts of the Dublin region had risen by between 3.8 per and 5.1 per cent.<sup>8</sup>

In the context of rising rents in Dublin, any further cuts in rent allowance in Budget 2014 would clearly have a most serious impact on the homelessness situation in the region, placing greater numbers of people at risk of becoming homeless and lessening the chances of people already homeless moving into long-term accommodation.

*Competition for private rented tenancies:* apart from any ideological motives that may have been at play in choosing to rely on private sector provision to meet social housing needs, there was also an assumption that there is a ready supply of accommodation in the sector. Table 4 below shows that between 2006 and 2011 there was a significant increase in the number of households in private rented accommodation, with the total number and percentage in such accommodation doubling in both the State as a whole and in Dublin.

**Table 4: Growth in Private Rented Tenure in Ireland & Dublin Region, 2002 to 2011**

<b>Year</b>	<b>Total Households in the State</b>	<b>Households in Private Rented in the State (No. &amp; %)</b>	<b>Total Households in Dublin Region (No. and % of all households in the State)</b>	<b>Number of Households in Private Rented in Dublin Region</b>	<b>% of Households in Private Rented in Dublin Region</b>	<b>Dublin Private Rented as % of all Private Rented in State</b>
2002	1,279,617	141,459 (11%)	378,410 (29.6%)	54,831	14.5%	38.7%
2006	1,462,296	145,317 (9.9%)	419,529 (28.7%)	57,914	13.8%	39.8%
2011	1,654,208	305,377 (18.5%)	466,992 (28.2%)	<b>116,935</b>	<b>25%</b>	38.3%

The most striking item of information in Table 4 is that, by 2011, one quarter of all households in Dublin were living in private rented accommodation, a marked increase on the figure for 2006 (13.8 per cent). Of course, the greater use of the private rented sector for ‘social’ housing accounts for part of this increase, but other factors – for example, the continuing high cost of houses in Dublin relative to net income, and significant obstacles to obtaining mortgage finance during the current downturn – resulted in many households which would, in other circumstances, have become owner-occupiers being forced to live in the private rented sector.

The picture of a high demand for private rented accommodation in the Dublin area is reinforced not just by evidence of recent increases in rent levels but by data from DAFT.ie relating to the first quarter of 2013, which show fewer properties on the market for rent than has been the case since early 2007. Commenting on the supply of properties for rent in Dublin in early 2013, the report says: ‘Whereas this time last year, a renter in the capital would have over 4,000 units to choose from – or indeed over 7,000 to choose from in 2009 – currently, there are fewer than 2,000 homes on the market in the capital’.<sup>9</sup>

The upshot of the trends emerging in the Dublin Region – the marked increase in the number of households living in private rented accommodation, the evidence that rents in Dublin are rising once more, the likelihood that many people who would like to purchase a house will be unable to do so, especially as Dublin house prices are beginning to rise again<sup>10</sup> – is likely to be that in the coming years there will be significant demand for this type of accommodation. In that context, those who are in the weakest position both financially and socially, such as people who are homeless, are very likely to lose out in terms of access to private rented accommodation and the cost thereof, relative to income.

*Conditions of rented accommodation:* given the level of rent allowance, and the unwillingness of many landlords to accept tenants using the payment, people reliant on rent allowance have very limited choice when seeking a place to rent and often are forced to accept the most basic accommodation. This may be particularly the case for people who are homeless, a majority of whom are single and so find it especially difficult to find accommodation at a rent that is within the limits set. In practice, it is well known that many tenants at the lower end of the market are living in conditions that do not even meet legal requirements. A study in 2006 by the Centre for Housing Research found that, in Dublin City, 78 per cent of all rent supplement tenancies did not meet minimum standards.<sup>11</sup> Investigations in late 2012/early 2013, during the first six months of an Intensified Inspection Programme being carried out by Dublin City Council, revealed that, on just three roads with a particularly high proportions of flats and bedsits, 1,384 of the 1,499 properties inspected (90 per cent) did not meet basic standards.<sup>12</sup> These findings starkly illustrate the reality of the wholly inadequate accommodation that is the only option for many people dependent on rent allowance, including people moving out of homelessness.

*Administrative delays:* there are often administrative delays involved in qualifying for and receiving rent allowance. Currently, it can take up to six weeks for an application for payment to be processed. Such delays can make it extremely difficult for a person homeless to actually secure accommodation: they find themselves in the situation of being unable to pay the deposit and rent for a flat which a landlord has agreed to let to them, but unless they show they have secured accommodation they cannot be paid the allowance. This kind of Catch 22 situation

would be difficult enough for anyone, but for a person who may be very vulnerable it may prove an impossible obstacle to moving out of homelessness.

*Limited rights for tenants:* aside from the Rental Accommodation Scheme, a tenancy in private rented accommodation gives rise to very limited rights for tenants and in particular provides very little security of tenure. In practice, the limited legal rights of tenants are particularly susceptible to being breached at the ‘lower’ end of the sector.

*Ill-equipped to deal with needs of vulnerable people:* the private rented sector is not a social service, but rather a business, where owners expect to make money. Whether landlords are owners of just one property (as recently published figures suggest is the case in respect of a large percentage of private rented properties in Ireland) or the owners of multiple properties, a question must arise as to how their legitimate concern to conduct a business and make a profit sits alongside the need to provide suitable accommodation for some of the most vulnerable people in the community?

### ***‘Modified’ Forms of Private Rented Accommodation***

The introduction of the Rental Accommodation Scheme, in 2004, and of the Social Housing Leasing Initiative in 2009, were, in effect, an acknowledgment that the ‘ordinary’ private rented sector was inadequate – in terms of quality of accommodation and security of tenure – as a means of meeting social housing needs, as well as absorbing a large, and ever escalating, amount of public funding. However, almost ten years after its introduction, the Rented Accommodation Scheme has secured only 20,000 of the 30,000 properties it was envisaged would be acquired for the programme.<sup>13</sup>

Meanwhile, despite the range of supports, in terms of management and maintenance, offered to landlords under the Social Housing Leasing Initiative, the fact that the scheme offers just 80 per cent of market rent makes it unattractive to property owners.<sup>14</sup> The perceived disadvantages of the scheme from the viewpoint of landlords will be likely to appear all the greater in a context where demand for rented accommodation is anticipated to remain high, and rents continue to rise.

### ***Social Housing Provision***

The corollary of the reliance of the private rented sector to meet social housing need is the reduction in the provision of new social housing stock provided by local authorities and voluntary housing associations. Currently, very few additions to the social housing stock are being made: in Dublin, in 2012, completions and acquisitions by local authorities and by voluntary and co-operative housing associations reached a mere 235 – in a context where there were over 20,000 households on housing waiting lists. (The national figure for completions and acquisitions was 1,391.) Budget 2013 continued a process in train for a number of years of drastically cutting the local authorities’ capital allocation for social housing and the allocation for voluntary housing associations under the Capital Assistance Scheme (CAS) and the Capital Advance Leasing Facility (CALF).



## **Need for an Alternative Policy**

In summary, the reliance on the private rented sector to meet social housing needs often means people having to live in insecure, poor quality, and often substandard accommodation, for which they are paying a proportion of their social welfare income that is higher than is officially recognised as being appropriate, and which, therefore, is likely to leave them with an income that is inadequate for other basic needs, such as food and energy.

Such circumstances may, on the one hand, lead to people falling behind in their rent and losing their tenancy and, on the other, make it extremely difficult for people to successfully move on from a period of homelessness. For the State, which is subsidising this arrangement, through expenditure that is now in excess of half a billion euro per annum, this approach represents a very poor return either financially or socially for such a huge financial outlay.

These factors, along with the trends in the Dublin Region already alluded to – rising rents and issues of supply – mean, at best, that a policy of relying on the private rented sector to meet the needs of people who are homeless is no more likely to be successful over the next three years than it has been to date; at worst, it may lead to a serious deterioration in overall situation.

### ***Recommendation***

Within the *Framework Statutory Homeless Action Plan for the Dublin Region 2014–2016* the supply of affordable, secure, and appropriate accommodation needs to be priority, if the goal of ending long-term homelessness through a housing-led response is to be achieved. The Jesuit Centre for Faith and Justice is unconvinced that this goal can be achieved through a reliance on the private rented sector. It would argue that ‘ending long-term homelessness’ cannot be understood as merely moving people out of hostel-type accommodation into housing in the community. If that housing is not affordable on a long-term basis, if it does not provide security and if it fails to meet minimum standards, then it does not represent a real transition out of homelessness and it certainly does not meet the benchmark of fulfilling the person’s right to adequate housing.

Given all the problems surrounding the use of the private rented sector to meet social housing needs, JCFJ believes that there must be a dramatic increase in the provision of social rental units, in effect, ‘a social housing boom’, if the goals of ending of long-term homelessness and preventing of homelessness, explicit requirements of the new *Action Plan*, are to be achieved.

### **Barriers to Ending Rough Sleeping**

*Good quality emergency accommodation is essential but much of the existing accommodation does not provide safe, secure, appropriate facilities.*

Emergency accommodation represents for a person or family newly-homeless their first encounter with the ‘homeless services sector’. What happens at this stage can be critical as to the eventual duration of the individual’s or family’s homelessness and to limiting the damage done by that period of homelessness.

Those who are newly homeless are invariably experiencing a period of personal crisis. The services they engage with should represent the best of social service provision, in terms of quality and hospitality. A crucial element of that provision is emergency accommodation. However, in reality, emergency accommodation in the Dublin Region is still often grossly inadequate.

#### *Supply issues*

Anecdotal evidence suggests that the number of people in the Dublin area who are unable to access emergency accommodation has been increasing. Peter McVerry SJ has commented publicly that, each night, sleeping bags are being handed out to people who cannot get a place in an emergency hostel and that the number of people presenting as homeless over the past 12 months has continued to rise, outstripping the supply of emergency places. He estimates that there are eight new people presenting themselves to the homeless services every day; meanwhile, just three people are leaving the system.

The successful implementation of a ‘housing-led’ approach to homelessness should lead to reduced pressure on places in emergency accommodation, since people would be moving out of such accommodation in a relatively short period of time. However, the reality of current levels of demand mean that attention must be urgently given to securing a sufficient number of emergency places. Ensuring an adequate supply of emergency accommodation places must be a key target of the Action Plan 2014–2016.

#### *Quality of the emergency accommodation stock*

The quality of emergency accommodation is in general very poor. The critical feature of this poor-quality provision is the fact that people do not have a room of their own, and so very young people have to share with much older people; non drug-users have no option but to share with people who are active drug-users, and people who have been sexually abused in childhood have to share a room with strangers. A regular experience of people who use emergency accommodation is that they wake up to find that all their possessions have been stolen during the night.

People who are homeless need to feel safe, and need to feel that their dignity is respected. Emergency accommodation at present falls far short of meeting these needs, and of respecting these fundamental rights. Many people who are ‘sleeping rough’ are doing so because they are afraid of what they may encounter in emergency accommodation.

The new Action Plan should include a commitment to a process of converting existing emergency accommodation so that individual rooms are provided for all residents; it should also include a commitment to ensuring that any new provision is of a high standard, with individual rooms.

A further essential feature of a good emergency service would be some assessment of those seeking the service, so that young people who are not substance abusers would not be brought into contact with those who have drug or alcohol problems.

## Recommendation

Emergency accommodation standards must immediately improved, so that people are provided with individual rooms and accommodated in facilities that are appropriate to their circumstances, based on age, and whether or not they are misusing drugs or alcohol. If supports are required, these should be individually tailored.

A sufficient supply of emergency accommodation needs to be provided.

There needs to be a commitment to ensuring that people are able to move out of emergency accommodation in hours, days or weeks (maximum eight weeks) rather than months.

## References

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<sup>1</sup> United Nations, Office of the High Commissioner for Human Rights (1966) *International Covenant on Economic, Social and Cultural Rights*, Adopted and opened for signature, ratification and accession by General Assembly resolution 2200A (XXI) of 16 December 1966 entry into force 3 January 1976, (available at: <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CESCR.aspx>).

<sup>2</sup> Office of the High Commissioner for Human Rights (1991) *The Right to Adequate Housing (Art. 11 (1)), Covenant on Economic, Social and Cultural Rights, General Comment 4*, (available at: <http://www.unhchr.ch/tbs/doc.nsf/0/469f4d91a9378221c12563ed0053547e>).

<sup>3</sup> Dublin Region Homeless Executive (2013) *Number of People Sleeping Rough in Dublin in November 2012 at 87 Persons* (available at: <http://www.homelessagency.ie/Media/2012-News/Number-of-People-Sleeping-Rough-in-Dublin-in-Novem.aspx>).

<sup>4</sup> Department of Environment, Community and Local Government (2011) *Housing Policy Statement* (available at: <http://www.environ.ie/en/DevelopmentHousing/Housing/PublicationsDocuments/FileDownload.26867.en.pdf>).

<sup>5</sup> Department of Environment, Community and Local Government (2013), *Homelessness Policy Statement* (available at: <http://www.environ.ie/en/Publications/DevelopmentandHousing/Housing/FileDownload.32434.en.pdf>).

<sup>6</sup> Housing Agency (2011) *The Housing Needs Assessment 2011* (available at: [https://www.housing.ie/Our-Services/Research-Services/Most-Viewed-Publications/Housing-Needs-Assessment-Report\\_web.aspx](https://www.housing.ie/Our-Services/Research-Services/Most-Viewed-Publications/Housing-Needs-Assessment-Report_web.aspx)).

<sup>7</sup> Private Residential Tenancies Board (2013), *The BRTB Rent Index* (available at: [http://www.prtb.ie/docs/default-source/rent-index/prtb-rent-index-quarter-1-2013-\(final\).pdf?sfvrsn=2](http://www.prtb.ie/docs/default-source/rent-index/prtb-rent-index-quarter-1-2013-(final).pdf?sfvrsn=2)).

<sup>8</sup> Daft.ie (2013) *The Daft.ie Rental Report, 2012 Q4* (available at: <http://www.daft.ie/report/Daft-Rental-Report-Q4-2012.pdf>).

<sup>9</sup> *Ibid.*, p. 2.

<sup>10</sup> Central Statistics Office (2013) *Residential Property Price Index, March 2013* (available at: [http://www.cso.ie/en/media/csoie/releasespublications/documents/prices/2013/rppi\\_mar2013.pdf](http://www.cso.ie/en/media/csoie/releasespublications/documents/prices/2013/rppi_mar2013.pdf)).

<sup>11</sup> Centre for Housing Research (2006) *Supplementary Welfare Allowance, Rent Supplement: Implications for the Implementation of the Rental Accommodation Scheme*, Dublin: CHR (available at: [https://www.housing.ie/Housing/media/Media/Publications/SWA-Rent-Supplement\\_Implications-for-the-Implementation-of-the-Rental-Accommodation-Scheme.pdf](https://www.housing.ie/Housing/media/Media/Publications/SWA-Rent-Supplement_Implications-for-the-Implementation-of-the-Rental-Accommodation-Scheme.pdf)).

<sup>12</sup> Olivia Kelly (2013) 'Dublin bedsit blitz finds over 90% of flats do not meet basic standards', *The Irish Times*, Friday, 26 April 2013 (available at: <http://www.irishtimes.com/news/social-affairs/dublin-bedsit-blitz-finds-over-90-of-flats-do-not-meet-basic-standards-1.1373158>).

<sup>13</sup> Nationally, RAS acquired an additional 1,416 properties on long-term lease in 2012.

<sup>14</sup> Simon Communities in Ireland (2012) *Pre-Budget Submission 2013* (available at: <http://www.simon.ie/Portals/1/Docs/PressReleases2012/Simon%20Communities%20in%20Ireland%20-%20Pre%20Budget%20Submissiion%202013%20-%20Nov%202012%20Final.pdf>).