

Summary of Social Housing Assessments 2016- Some Frequently Asked Questions

The total net need for social housing is as follows:

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| Total number of qualified households 2016 | 91,600 |
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|--|---------------|
| Total number of qualified households 2013 | 89,872 |
|--|---------------|

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|---------------------------------------|------------------------|
| Increase between 2013 and 2016 | 1,728 (up 1.9%) |
|---------------------------------------|------------------------|

1. Frequently Asked Questions

1.1 The Summary Process

How did the 2016 Summary process work in practice?

- The Summary process required housing authorities to review qualified households who were not currently in receipt of housing support to ensure that they still qualified and required support, and to ensure that the details of the applicant households was accurate and up to date. The 'counting' date of the assessment was set at 21 September 2016.
- Any household that had been assessed or reviewed since 21 September 2015 did not need to submit updated details under this assessment unless there had been a recent change in the household circumstances. Thus, they automatically retained their place on the list without the need for a review.
- Households on the waiting list for longer than one year, who had not been recently reviewed, were written to and requested to update their details.
- Under Guidelines issued by the Department, there was a high level of engagement by LAs with households on their lists. Households were written to at least twice and in some areas, authorities also texted or telephoned non-respondents. A general awareness campaign was also run through social media and through placing advertisements in local newspapers and in other public offices.
- If a number of attempts to contact a household were made and there was still no response, then an application could be closed and a household removed from the list. However, authorities are given discretion to reactivate an application where a household subsequently comes back with information, within a reasonable timeframe.

1.2 Nature/Reliability of Data Collected

How reliable is the 2016 figure of 91,600? How can it be an accurate reflection of the national of housing need given that the media reported a figure of more than 130,000 last year?

- The 2016 figure provides the most accurate and reliable record of the number of households which are currently qualified for social housing support under the Social Housing Assessment Regulations 2011 ("2011 Regulations") and whose housing need is not being met in any way. The data was compiled following a common methodology across 31 local authorities and a subsequent rigorous analysis of the data collected.

- The figure of 91,600 represents the “net need” position and was calculated having excluded duplicate applications, households appearing on multiple lists in different authorities (e.g. households legitimately on more than one Dublin/ Cork/ Galway list), households already in receipt of a form of social housing support (such as RAS or HAP), and households which have applied for transfers.
- Other higher figures that may have appeared in the media in recent times most likely did not exclude many of these categories i.e. they were not of “net” need. They were essentially a snapshot of ‘gross’ housing need at a point in time and as such would have methodological weaknesses when compared to the 2016 Summary dataset. It is those figures that cannot be relied upon and not the results of this summary process.

Are the summary results directly comparable with the last survey in 2013?

- Yes. The 2016 summary is the second summary to be carried out under the new assessment regime introduced in 2011. The first was in 2013.
- The 2016 Summary was carried out using essentially the same methodology as that used in 2013. There were some minor changes based on learnings from the 2013 summary process. These involved the re-categorisation of existing data fields to ensure better statistical accuracy. The similarity in methodologies allows for the 2016 results to be robustly compared with the 2013 results thereby giving a realistic picture of the change in the level of housing need nationally.

Can the results be compared to summaries carried out before 2013?

- No - at least not in any reliable way. Previous summaries were not carried out under a standardised assessment regime for social housing support. The regime introduced in 2011 amended some Basis of Need categories which would mean that the direct comparison of some data with assessments prior to 2013 is unfortunately not possible. In addition, in 2011, 2008 and 2005 RAS was not considered a social housing support so households in this form of accommodation were included in the Net Need figure.
- It should also be noted that the 2011 Summary was a snapshot of those households registered with local authorities as being in housing need at that time and, unlike 2013 and 2016, did not involve authorities reassessing the households on their lists to ensure that they were continued to qualify for, and require, support.

When is the next SSHA going to take place?

- In line with a commitment given in the *Social Housing Strategy 2020* the SSHA will be carried out on an annual basis from now on. I expect the results of the 2017 summary to be available for publication in the latter half of next year.

1.3 Removal of Households from the list

Has the process led to households which were previously qualified, being removed from housing lists?

- Yes. The aim of the 2016 Summary was to capture the total number of households nationally which are qualified for social housing support and whose housing need is not being met. The summary process involved authorities reviewing the households on their lists to confirm that they were still qualified for, and require, social housing support.
- Where, following a review, a household is found to no longer meet the eligibility and/or the need criteria, that household was removed from the housing list. Full and final national figures are not yet available but it is likely (based on returns from 25 of the 31 Local Authorities) that more than 25,000 households were removed from the list as part of the 2016 process. More than 50% of these were taken off following a failure to engage with the local authority. A significant number of others would have had their housing needs met through HAP, RAS etc. Less than 5% were taken off due to income eligibility reasons (Note: these are provisional figures and are based on returns from 25 of the 31 local authorities- as such they are likely to be indicative of the national position but should none the less be treated with caution).

Is it the case that households were taken off housing lists for failing to reply to local authorities' correspondence?

- Yes. Detailed guidance was issued by the Department to authorities on the summary process which advised that where authorities had made a number of unsuccessful attempts to contact a household (comprising at least two letters and other measures at the discretion of the authority) then the household's application could be closed.
- However, as authorities have done previously, where a household subsequently comes back with the required information within a reasonable timeframe, then the authority could reactivate the application without affecting the original date of qualification.

Where, on review, a household's income was found to be above the relevant income threshold, was the household removed from the list?

- Yes. Where a household is found to exceed the relevant threshold upon review, the household would no longer be eligible to qualify for support, and therefore would be taken off the list.
- The 2011 Regulations prescribe the maximum income limits that can be set by each housing authority to be applied in assessing an applicant's eligibility for social housing support. The 2011 Regulations do not provide housing authorities with any discretion to exceed the thresholds that apply to their administrative areas.

- In determining whether a household meets the income eligibility requirement, the household's income is assessed in accordance with the Household Means Policy which was issued by the Minister under Regulation 17 of the 2011 Regulations. The Policy defines the types of income to be taken into consideration and also provides for a range of income disregards.
- The Household Means Policy provides housing authorities with discretion to disregard income that is considered to be temporary, short-term or once off. Housing authorities were advised to ensure that all possible income disregards are applied in calculating a households' income.

1.4 Eligibility Assessment

How are applicants for social housing support assessed?

- A new standard procedure for assessing applicants for social housing was introduced in every housing authority on 1 April 2011 through the Social Housing Assessment Regulations, 2011.
- The new assessment system:
 - set maximum net income limits based on the cost of housing in the area in question (definition of net income is set out in Household Means Policy)
 - Included a standard prescribed form to be used by all housing authorities
 - Allowed a household to apply to one housing authority only, but to have areas of choice in up to three authorities within that (geographical) county, including any city or town in that county.
- The ultimate aim of the new system was to create a fairer, more consistent and transparent approach to eligibility for social housing support. The criteria for determining housing need are set out in the 2011 Regulations and are broadly similar to what was provided for in earlier legislation. Housing authorities may review the eligibility of households on the waiting list at any time and are required to review eligibility prior to the allocation of accommodation.
- All aspects of the new assessment system are kept under review to ensure that it functions in the intended manner.

What are the income thresholds?

- The Social Housing Assessment Regulations 2011 prescribe maximum net income limits for eligibility for social housing supports in each housing authority, in different bands according to the area, with income being defined and assessed according to a standard Household Means Policy. There are currently three bands – with maximum income limits per individual

(main applicant) set at €35,000, €30,000 and €25,000 (the limits are higher for households with children). These are net income figures after tax, USC etc. The €35,000 limit would correspond to a gross salary of more than €48,000.

- The income bands and the authority area assigned to each band were based on an assessment of income needed to provide for a household's basic needs plus a comparative analysis of the local rental cost of housing accommodation across the country. The limits also reflect a blanket increase of €5,000 introduced prior to the new system coming into operation, in order to broaden the base from which social housing tenants are drawn and thereby promote sustainable communities.
- The current income limits generally provide for a fair and equitable system of identifying those households unable to provide accommodation from their own resources. However, these limits will continue to be kept under review by the Department, as part of the broader social housing reform agenda set out in the *Social Housing Strategy 2020 – Support, Supply and Reform* and *Rebuilding Ireland – Action Plan for Housing and Homelessness*.

Why introduce income limits for applicants for social housing at all?

- Prior to 2011, many local authorities did not have income limits. Of those that did, they varied from place to place. There were also very significant variations in how income limits were defined. Some related to gross income while some made an allowance for rent being paid. Some included all income, including child benefit etc., others disregarded different incomes. The result of this was an inconsistency which meant that applicants for social housing support, on similar incomes, could be treated very differently, just because they happened to live in different local authority areas.
- The new maximum limit approach is clearer, being a fixed figure depending on the size of the household. How the net income figure is arrived at is also clearer, and it is set out in the Household Means Policy. This clarity and transparency facilitates both applicants and housing authorities.

What is the rationale behind the limits and how were they arrived at?

- The determination of the three bands and the authority area assigned to each band was based on an assessment of the income needed to provide for a household's basic needs plus a comparative analysis of the local rental cost of housing accommodation across the country.
- The limits also reflect a blanket increase of €5,000 introduced prior to the new system coming into operation, in order to broaden the base from which social housing tenants are drawn and thereby promote sustainable communities.
- The three bands, therefore, take account of the variation in the cost of private rented accommodation across the country. The principle behind determining what is reasonably affordable for any household is the relationship of household income to the cost of

providing suitable accommodation in the private sector - particularly rented accommodation - so that the percentage of net income required in order to pay for accommodation costs will not exceed 30%.

1.5 Legislative Basis for the 2016 Summary

Under what legislation is a household's eligibility assessed for social housing support?

- In April 2011 Section 20 of the Housing (Miscellaneous Provisions) Act 2009 was commenced and the Social Housing Assessment Regulations 2011 were made under that provision. Since then all housing authorities must assess applicants for social housing support in accordance with the 2011 Regulations.
- Under the 2011 Regulations, a household must be deemed both eligible and in need in order to qualify for social housing support. If a household does not meet the eligibility criteria, it cannot qualify for social housing support.
- Where a household is eligible and demonstrates a need in accordance with the Regulations, they are then deemed to be qualified i.e. they are entered on the record of qualified households for social housing support for that authority. The main focus of the summary assessments is the number of qualified households and the reasons for their qualification.

What is the legal basis underpinning the 2016 Summary?

- Summary Regulations prescribing the format of the summary, a Ministerial Direction and detailed guidance were issued to local authorities on 9 June 2016.
- The Direction, issued under Section 21 of the Housing (Miscellaneous Provisions) Act 2009 required all housing authorities to provide a summary report of social housing assessments as at 21 September, 2016, including detail relating to the number of households who are on the housing waiting list.
- The 2016 summary is the second such summary to be undertaken under the 2009 Act. Prior to 2013, a summary, then known as a Housing Needs Assessment, was carried out every three years under Section 9 of the Housing Act 1988.

2. Breakdown by Local Authority Area

The Summary Report gives a comprehensive breakdown of the figures by each of the 31 Local authority areas in the country.

2.1 Local Authorities where Housing Lists decreased between 2013-2016

- 15 Local Authorities saw the number of households requiring housing support in their area fall between 2013 and 2016. The tables below show the top 5 in absolute and percentage terms

Top 5 LAs where List decreased (ranked in absolute terms)

| | 2013 | 2016 | Change |
|--------------|-------------|-------------|---------------|
| Cork City | 6,440 | 4,440 | -2,000 |
| Louth | 3,809 | 2,600 | -1,209 |
| South Dublin | 6,217 | 5,562 | -655 |
| Cork County | 4,804 | 4,241 | -563 |
| Donegal | 1,675 | 1,267 | -408 |

Top 5 LAs where List decreased (ranked in percentage terms)

| | 2013 | 2016 | % Change |
|-----------|-------------|-------------|-----------------|
| Louth | 3,809 | 2,600 | -31.7 |
| Cork City | 6,440 | 4,440 | -31.1 |
| Carlow | 1,043 | 719 | -31.1 |
| Monaghan | 696 | 514 | -26.1 |
| Donegal | 1,675 | 1,267 | -24.4 |

Notes:

- There is no one single primary reason as to why lists have decreased in the 15 LAs which saw their numbers fall between 2013 and 2016. The reasons can differ depending on the local authority and in some cases the fall can be due to a multiple of factors.
- Cork City advised that the reduction in the numbers on their list was due to the interaction of a number of factors. Firstly, they introduced choice-based letting in 2015 and as part of the roll-out of this programme asked households on their list to confirm whether or not they were still interested in housing support- many did not. Secondly they brought a number (more than 500) of void properties back into use and acquired a number of other properties (more than 170). Finally there has been a significant take –up of HAP in the city (in excess of 700 by September 2016).
- Louth advised their reduction was due to the failure of almost 1,000 households to respond to requests for updated information and the subsequent closure of application. There has also been a significant take up of HAP – 1,025 households as at 21 September 2016.

- In other LAs the fall can be attributed to the closure of a number of applications due to non-response. For example, this was the primary reason for a reduced list in South County Dublin.

2.2 Local Authorities where Housing Lists increased between 2013-2016

- 16 Local Authorities saw the number of households requiring housing support in their areas increase between 2013 and 2016. The tables below show the top 5 in absolute and percentage terms.

Top 5 LAs where List increased (ranked in absolute terms)

| | 2013 | 2016 | Change |
|-------------|-------------|-------------|---------------|
| Dublin City | 16,171 | 19,811 | 3,640 |
| Galway City | 2,471 | 3,322 | 851 |
| Fingal | 6,020 | 6,858 | 838 |
| Meath | 2,502 | 3,311 | 809 |
| Wexford | 2,087 | 2,744 | 657 |

Top 5 LAs where List increased (ranked in percentage terms)

| | 2013 | 2016 | % Change |
|-------------|-------------|-------------|-----------------|
| Roscommon | 252 | 560 | 122.2 |
| Leitrim | 251 | 363 | 44.6 |
| Galway City | 2,471 | 3,322 | 34.4 |
| Laois | 902 | 1,198 | 32.8 |
| Meath | 2,502 | 3,311 | 32.3 |

Notes:

- The large increase in absolute terms in Dublin City can be attributed in the main to demographic factors/pressures. Furthermore HAP has yet to be rolled out in the city (due to start in March 2017) and as a result does not exist as an alternative form of housing support to those in need.
- HAP is not yet in Fingal (due to start on 1 March 2017) and only started in Wexford on 1 December 2016.

Social Housing Policy

December 2016.