

## **Immigrant Council of Ireland**

### **Suggested Actions on Housing for the National Migrant Integration Strategy**

November 2018

#### **Data Collection**

1. Full collation of data on country of birth and citizenship status of all social housing applications in each Local Authority, including failed applications and people on waiting lists. Changes to centralised forms should also be enacted to record ethnicity as, for example, Roma and Black Irish and other ethnicities will not be identified by the current information collected.
2. Full collation of data on country of birth or citizenship status for Rent Supplement and the Housing Assistance Payment. As with above, changes to centralised forms should also be enacted to record ethnicity as, for example, Roma and Black Irish and other ethnicities will not be identified by the current information collected.

#### **Intercultural policy development in Local Authorities and AHBs**

3. Local Authorities need more support and guidance on the application of social housing regulations in the context of non-Irish citizens. The Mercy Law Centre, Focus Ireland and other agencies working in the area of housing and homelessness frequently deal with migrants who are incorrectly refused a place on social housing lists due to misapplication of the social housing regulations by Local Authorities. Circular 41/2012 on social housing for non-Irish citizens needs to be reviewed in consultation with stakeholders as its guidance is confusing, incomplete and lacking the necessary detail to support Local Authorities to make appropriate decisions.
4. Through central support from the Department of Housing, Planning and Local Government, each Local Authority and Approved Housing Bodies (AHBs) should be supported to develop:
  - a. policies for dealing with racially motivated anti-social behaviour<sup>1</sup> experienced by their tenants and those receiving HAP.
  - b. allocation policies which ensure a balanced mix of ethnic and nationality groups in estates, complexes and streets.

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<sup>1</sup> <https://www.immigrantcouncil.ie/sites/default/files/2017-10/AR%202016%20Taking%20Racism%20Seriously%20-%20social%20housing.pdf>

- c. and implement intercultural strategies and training on the public sector duty to ensure minority groups can access their services on an equal footing.

### **Private rented dependence**

5. The migrant population are highly dependent on the private rented sector. An analysis should be undertaken regarding awareness levels and service usage of the Residential Tenancies Board among migrants and how accessible they find the RTB services e.g. Is information provided in an accessible format, including multiple languages?
6. A recent ESRI/IHREC report<sup>2</sup> found Black people are 3.5 times more likely to be discriminated against when looking for housing. This is a very serious finding which needs urgent action as its implications are grave and intergenerational, and can lead to homelessness. The same report found Africans are overrepresented in the homeless population. One of the required actions is further education for landlords and tenants on what constitutes discrimination in housing. An analysis of the effectiveness of the law and the penalties in this area should also be scheduled.

### **Homelessness**

7. Migrants are disproportionately represented in the homeless population. Data on the nationality of the homeless population should be regularly collated. The PASS database which records details of homeless people in the Greater Dublin Area includes this data. The Minister for Housing, in response to a query from the Immigrant Council of Ireland, said it would delay the publication of homelessness figures if data on nationality were also to be extracted.
8. The Department of Housing, Planning and Local Government needs to provide clear guidance to Local Authorities in relation to the legal entitlement to homeless accommodation provision to non-Irish nationals in tandem with the recommended review of Circular 41/2012.
9. Rebuilding Ireland<sup>3</sup>, the government's strategy to address homelessness, does not address the structural inequalities which exist for migrant households. The Department of Housing, Planning and Local Government should convene a multi-stakeholder group to develop a migrant homelessness strategy and implementation plan to identify and address the structural and institutional barriers migrant households face in the prevention of homelessness and in moving on from homelessness.

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<sup>2</sup> <https://www.ihrec.ie/app/uploads/2018/06/Discrimination-and-Inequality-in-Housing-in-Ireland..pdf>

<sup>3</sup> <http://rebuildingireland.ie/>

## **Direct Provision**

10. We recommend the Department of Justice and Equality scales up its engagement with the AHBs and in conjunction with the Department of Housing, Planning and Local Government provides improved incentives for AHBs to deliver more appropriate housing solutions for this most vulnerable housing community.

\*Advice from the Mercy Law Resource Centre and Focus Ireland was received in the preparation of this submission.