



Irish Council
for Social Housing

Éilis Fallon
Committee Secretariat
Committee of Public Accounts
Leinster House
Dublin 2

11th March 2019

Re: *ICSH Response to Public Accounts Committee*

Dear Ms. Fallon,

Subsequent to your correspondence of 28th February 2019, please see below responses to the questions raised by the PAC at the committee meeting on 21 February 2019.

Kind Regards,

Donal McManus
CEO, ICSH

1. Details regarding security of tenure for clients in AHBs including life tenure and any reduction in tenure in properties acquired under the NAMA scheme;

Security of tenure for tenants and the provision of long-term homes is a core objective for Approved Housing Bodies (AHBs). Since 7th April 2016 AHB tenancies in long-term occupation (i.e. not hostel or emergency accommodation) came under the remit of the Residential Tenancies Board (RTB). This applies to all such tenancies regardless of whether the property is owned or leased by the AHB.

Under the RTB, tenancies commencing before 24th December 2016 are 4 years in length. For tenancies that began after the 24th of December 2016, security of tenure has increased to 6 years. These are referred to as 'Part 4' tenancies. A 'further Part 4 tenancy' begins once the initial 'Part 4 tenancy' has finished. From the 24th December 2016, when a 'further Part 4 tenancy' commences, it lasts for 6 years for all tenancies. There all further Part 4 tenancies last for another 6 years and continue on.

Tenancies which are provided by an AHB on foot of a lease from NAMA (NARPS Lease) also come under the remit of the RTB as outlined above.

2. Overall staffing levels including staff dealing with housing and accommodation and those providing support services;

The data available to the ICSH on the level of staffing and volunteering is derived from our membership application process. The following data on staffing and volunteers is from 2018.

The higher numbers of staff in Tier 1 & Tier 2 AHBs is due to the care and support services which those housing associations provide for tenants. Therefore not all the staff listed below are involved in the provision of housing services which would be a much smaller number than this. The ICSH does not have a breakdown available on the split between staff engaged in housing functions and staff engaged in care and support services. The Interim Housing Regulator did an exercise on the staffing levels as part of their annual return and so will have further data available on this.

	Number of units	Number of staff	Number of volunteers
Tier 1	4769	1948	1651
Tier 2	4556	1895	3021
Tier 3	20478	757	1250
Total	29803	4600	5922

3. Details regarding the operation of Payment and Availability agreements;

Payment and Availability Agreements (P&A) are available under the Social Housing Current Expenditure Programme for the provision of social housing. Under the P&A the following applies:

- an AHB makes units available for social housing for an agreed term to nominated tenants from the Local authority waiting list;
- usually for 10- 30 years;
- the LA makes payment based on market rent, quarterly in advance to the AHB;
- the tenant pays the Local authority differential rent;
- the AHB is the landlord to the tenants.

A P&A agreement can be used for lease of properties as well as acquisition and construction of homes.

For acquisition and construction the P&A can be used in conjunction with the CALF. The CALF is a facility available to Approved Housing Bodies (AHBs) to assist them in accessing private or Housing Finance Agency (HFA) finance for the purchase, construction or refurbishment of units that will then be made available for social housing purposes under the Social Housing Current Expenditure Programme (SHCEP).

The facility is available as part of a project where the AHB makes units available under a payment and availability (P&A) agreement to nominees of the housing authority for a set period of time. Repayments on the loan (capital advance) are not required during the term of the P&A agreement but the amount will remain outstanding at the end of the agreement.

4. Information in relation to local property tax paid by Approved Housing Bodies; and

Approved housing bodies are liable to pay the tax on their properties in the same way as any other residential property owner. There is an exemption available if the property is in use to accommodate people with special housing needs.

Properties used by a charity or public body providing special needs accommodation

This exemption applies to residential properties owned by a charity or a public body. In addition to providing accommodation, the property must be used:

- to provide support for people who have a particular need and to enable them to live in the community.

Approved housing bodies value their residential properties in valuation Band 1 (0 - €100k) approximately €90 per property per year.

5. A note on the number of new builds delivered by the sector in 2018.

The following table provides figures for the homes delivered by AHBs in 2018 as reconciled by the DHPLG.

The Build figure is in respect of all new build including turnkey developments under CAS and CALF and Part V in 2018 and amount to 1,728 homes.

	CAS	CALF	Leasing	Part V	Total AHB output	Total Output AHB+LA	% AHB delivery
Build	183	1205		340	1728	4811	36%
Acquisition	302	775			1077	2610	41%
Leasing			414		414	1001	41%
	485	1980	414	340	<u>3219</u>	8422	38%