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IF NOT
NOW,

WHEN?

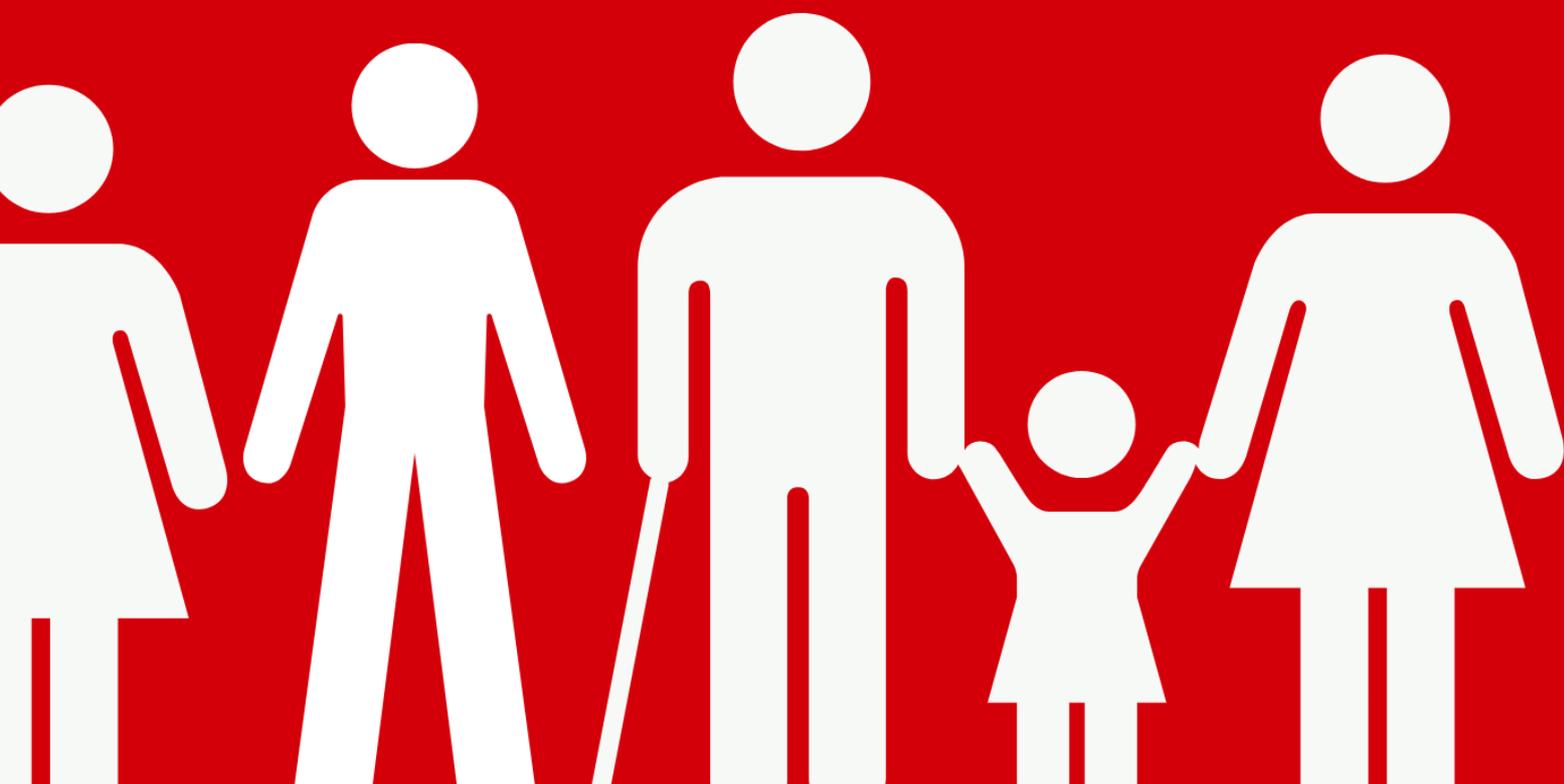


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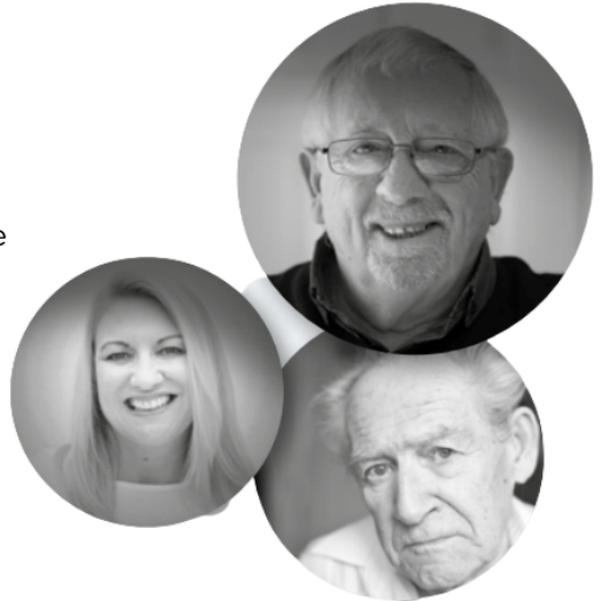
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About ALONE

ALONE is a national organisation that supports and empowers older people to age happily and securely at home. We support individuals and their families, work with other organisations, and campaign nationwide to improve the lives of older people. We work with all older people, including those who are lonely, isolated, homeless, living in poverty, or are facing other difficulties. We support them through these challenges to help them find long term solutions. ALONE provide social, practical and housing supports. We use individualised support plans and provide one point of contact for older people to access health, social care, housing and other services to improve physical, emotional and mental wellbeing. ALONE enables outcomes including improved quality of life, community activation, and implementation of national strategies.

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Introduction from Seán Moynihan, CEO

Over the last few months, we have all become aware of the increasing cost of living. It is affecting families, single people, older and younger, renters and homeowners, across all cohorts and groups.

At ALONE we have seen a marked increase in the number of older people extremely concerned about the difficulties they are experiencing in relation to these costs. 92% of older people we work with tell us they are most concerned about heating and energy bills. Two thirds of them are very concerned about rising food costs that are forcing them to change their behavior, often with their nutrition suffering as a result. Household maintenance is proving too costly for over 30% of them, meaning that their living conditions are suffering. Rising transport costs mean that social isolation is increasing, as they cannot afford to get out and about as much as they would like.



At ALONE we have seen a marked increase in the number of older people telling us about the difficulties they are experiencing in relation to these costs. Older people tell us they wear coats and blankets indoors during the day, ration their food, go to bed in the afternoons to save on heating costs, and more. Many are struggling or unable to pay their bills. As we can see in the survey of older people we support (see pages 3-6), nearly three quarters are 'very' or 'extremely' concerned about the cost of living. This survey highlights a worrying situation for many older people, as inflation is not showing signs of slowing down for some time to come.

The difficulties being experienced by older people are increasing. More and more of us are renting into retirement age and beyond as housing costs have skyrocketed. Living costs are increasing. Older people, reliant on fixed incomes, are vulnerable to these changes. At ALONE we are already seeing the sea change coming among the cohort we work with. In the years to come, older people will struggle even more unless significant action is taken. We know this is possible, but we need to see Government make the right choices in Budget 2023. **The question we are asking ourselves is, "if not now, when?"**

Often younger people forget that older people are not a separate cohort with nothing in common with them. We all get older sooner or later. We forget that campaigning for an increase to the pension, or for housing options for older people, is in fact a campaign for all of us. Working to improve the situation is not just for those of us who are at pension age today, but those who will be there next year and in ten years' time and beyond. What do you want for yourself when you are in your seventies and eighties? This is what we must work towards, starting today.



Seán Moynihan
ALONE CEO

ALONE survey of older people we work with



Over the course of one month, ALONE carried out a survey by telephone and online with 123 older people we work with. This group represents a cross section of older people who use our Telephone Support & Befriending and Visitation Support & Befriending services. The survey results are anonymised.

Key findings:

Nearly three quarters were 'very' or 'extremely' concerned about the cost of living.

- 38% (47) were 'extremely' concerned about the cost of living
- 36% (44) were 'very' concerned about the cost of living
- 18% (22) were 'concerned' about the cost of living
- 7% (9) were 'a little concerned' about the cost of living
- Less than 1% (1) were 'not concerned at all' about the cost of living

Nearly two thirds worry about struggling to pay the bills.

- 65% (80) worry about struggling to pay their bills
- 35% (43) do not worry about struggling to pay their bills

Heating/energy bills, food prices and household maintenance (such as broken appliances) are the increases in costs that most concern older people.

1. Heating/energy bills (91.87% - 113 respondents)
2. Food prices (66.67% - 82 respondents)
3. Household maintenance (broken appliances etc) (31.71% - 39 respondents)
4. Transport (29.27% - 36 respondents)
5. Healthcare costs (23.58% - 29 respondents)
6. Home care costs (12.20% - 15 respondents)
7. Telephone bills (13.82% - 17 respondents)
8. Other (please specify) (6.50% - 8 respondents)

When asked “What do you think the Government should do in the budget to help older people?”, the most popular responses were to reduce costs like energy, closely followed by increasing payments to more vulnerable members of our society.

- 1.Reduce costs like energy (67.48% - 83 respondents)
2. Increase payments to more vulnerable members of our society (63.41% - 78 respondents)
3. Provide more services like home care, public transport (56.91% - 70 respondents)
4. Reduce taxes like excise duty/VAT (36.59% - 45 respondents)
5. Other (please specify) (12.20% - 15 respondents)

Quotes from older people about the impact of the increasing cost of living on them:

"Couldn't be worse. If I didn't have extra help from family I wouldn't be able to cope financially."

"Anxiety about having enough money to pay everything - even just going to the shop for groceries, hoping to have enough money."

"I fear that I won't be able to heat my home and afford to eat come the winter."

"Selling off items to support, struggling to pay bills. €50 increase in rent, don't know where this money will come from."

"I don't have transport and can't get to cheaper shops like Lidl. So I can't afford much shopping. I had to beg SVDP for a food hamper. I can't afford to buy myself any clothes."

"I worry that as I get older that the prices will increase more than I'm able to pay and that my current standard of living will fall."

"Having to make tough decisions on what to spend my money on, and having to dip into savings."

"My pension is spent immediately so I can't save for any emergency."

"I have to decide between buying food or paying for heating."

"Less money to even go out and meet a friend as you are worried you might spend your bill money."

"My savings are much reduced because of the increased prices of everyday things."

"Curtailed heating. [I have an] old system and can't afford to update it."

"I hate opening my post."

"I cannot afford treats for myself (like a cake or bun) or grandchildren anymore."

"5 euro extra on pension? - I can't buy a week's worth of bread and milk for that."

"Worried about my future and how I will cope with the cost of living."

“Where will it stop! And can I cope?”

“Spending more on basic food items, everything went up in price. Had to change supermarkets.”

“Cutting back because of rising prices, no money for haircuts or extras like grandchildren’s birthdays.”

“Fear of having no money for any emergencies eg fix car, get electrician, plumber.”

“I’m retirement age but I still work.”

“Hard to cover the household bills, leads to increased stress and anxiety.”

“Ireland is one of the most expensive countries in Europe and inflation is making it harder to live here.”

“I watch my meter and worry that it’s wrong. I go out less.”

“Watching every penny and worrying how to manage bills on my own.”

“Worry about having enough to make ends meet.”

“Energy costs hard to control.”

“Waiting on the bills coming home.”

Summary of recommendations

Department of Social Protection

Across all budgetary decisions:

- Poverty, gender, and equality proof all budgetary decisions to assess the likely impact that they will have on poverty rates and at-risk groups.
- Implement the OECD recommendations for Ireland on poverty and equality proofing.
- In general, increase core social welfare rates ahead of projected inflation to ensure people on low and fixed incomes can stay afloat in a sea of rising living costs and to prevent a rise in inequality.

1. Accessing entitlements

- Simplify the processes for applying for entitlements to enable accessibility for older people. Each State body providing supports specific to older people should develop a One-Stop Shop for older people to access their relevant entitlements.
- For the Department of Social Protection, this would mean developing a one-stop shop approach for accessing and applying for pension, fuel allowance, Living Alone allowance, the Household Benefits package and Telephone Support Allowance.

2. State Pension

- Put in place relevant legislation for formally introducing the Benchmarking of the State Pension as committed to in the Roadmap to Social Inclusion 2020-2025 (which had a target of Budget 2021 for its implementation).
 - In the interim, increase the State Pension to meet the amount set out by minimum benchmarking. This means an increase to the pension of more than €40, which ALONE recommends should be met over the course of this Budget and Budget 2024, beginning with an increase of €20 in Budget 2023. We ask that this two-year increase of at least €20 in both years is committed to publicly during Budget 2023.
 - Legislate for and introduce the Automatic Enrolment System.
 - Introduce legislation to implement the Total Contributions Approach.
 - Set the model at 30 years, as suggested in the 2010 National Pensions Framework.
 - Increase Home Caring Credits to 25 years under the model.
 - Maintain the current State Pension age.
-

3. Living Alone Allowance

- Commit to benchmarking the Living Alone Allowance to one quarter of the State Pension to target older people most at risk of poverty and deprivation and mitigate the decreased spending power experienced by older people living alone.
- In the interim, increase the Living Alone Allowance by €20 to €42.
- In addition, ALONE recommend that an older person should be able to continue to claim at least half of their partner's pension after they have died, to enable them to maintain their standard of living.

4. Fuel Allowance

- Urgently review the implementation of the Strategy to Combat Energy Poverty 2016-2019, and commit to updating the Strategy (Department of the Environment, Climate and Communications) and commit to implementing new measures (Department of Social Protection), in particular those relevant to the Fuel Allowance.
- Extend the Fuel Allowance season from 28 to 35 weeks, from the beginning of September to the beginning of May, and increase the amount from €33 per week to €53 per week.

5. Exceptional and Urgent Needs Payments

- Review the Exceptional and Urgent Needs Payments schemes, including a note of the total number of applications and rate of success. Streamline the criteria for application nationwide.
-

Why should Government and the Department of Social Protection implement these changes?



1. Poverty rates for older people are increasing.

The latest CSO Survey on Income and Living Conditions (SILC) data indicates that those aged 65+ were the only group to see increases across all three poverty rates between 2020 and 2021 - at risk of poverty (9.8% to 11.9%); deprivation (8.1% to 8.4%); and consistent poverty (1.0% to 2.5%). [1]

Over 65s were the only age group which saw an increase in those at risk of poverty from 2020 to 2021, increasing from 62,482 people to 75,870 - an enormous 21%. That's more than the entire population of Roscommon (69,995).



2. Older people living alone are among those struggling most.

For older people living alone, between 2020 and 2021, the at-risk of poverty rate increased from 20.5% to 21.5%; deprivation increased from 10.6% to 12.1%; and consistent poverty almost doubled, increasing from 2.2% to 4.3%. [2]



MESL figures show that in 2021, €333.47 was the necessary weekly income for an older person living alone in a rural area to meet the minimum standard of living. This has increased to €383.15 in 2022 [3]. The current State Contributory Pension is €253.30, while the Non-Contributory Pension is €242.

Today, an older person living alone reliant on the pension and other state benefits still does not meet the threshold to reach a minimum essential standard of living in rural areas...and this does not even take into account the ongoing impact of inflation throughout the rest of 2022 and into 2023.



3. Older people are among those feeling the impact of inflation most...

...and are most vulnerable to its impacts, as the majority of older people are on a fixed income. In fact, more than half of those over 66 are solely dependent upon the State pension. CSO data shows that people aged 65+ are experiencing among the highest inflation rates at an estimated 7.2%, the main contributors to this being electricity, fuel and transport [4].

4. More older people are paying for housing costs into retirement.



The State Pension in Ireland is supposed to contribute to the cost of living, but not accommodation costs – costs that many now continue to pay into their retirement. It is based on the assumption that the accommodation costs of older people are either nil, or very low.

It is clear however that older people not only have housing costs, but they are struggling significantly with them. In 2021, of households containing at least one adult aged 65+, 4.3% had failed to make a mortgage or rental payments on time in last 12 months, and an additional 7.2% had failed twice or more [5].

People are renting later in life due to unaffordability of housing. The 2016 Census indicated that 2.4 per cent of the over 65s and 10 per cent of people between 50 and 54 are renting from private landlords, a proportion we expect to have increased in the 2022 Census. According to the CSO, close to half (49.5%) of tenants who are 65 or over are spending more than 35% of their disposable income on rent [6].

Among social housing applicants, those aged 60-69 and 70+ are the only age groups to have seen an annual net increase in the number of applicants since 2017. More than 1 in 4 applicants for social housing in 2021 were aged 50 or over. [7]

5. Older people have been promised better, and that promise hasn't been kept.



Government committed to introducing benchmarking for the State Pension in the 'Roadmap for Social Inclusion 2020-2025'. It included a goal to 'Apply the benchmark in adjusting Pension changes for Budget 2021'.

This goal was not met. If it had, older people today would not be struggling to the extent they are with the increase in cost of living. At ALONE, we believe the Government needs to make the right decision for this year's Budget and ensure that its promises are kept.



6. Our population is ageing.

Our older population is expected to grow from 640,000 to 1.56 million by 2051. [8]
Today, a significant cohort of older people are not receiving the supports they need to be financially secure in their retirement. If not now, when?

References

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- [2] Ibid
- [3] Vincentian Partnership for Social Justice, MESL figures 2022. Accessed at https://www.budgeting.ie/download/pdf/pen_core_mesl_r_2022.pdf
- [4] Central Statistics Office, 2022. Accessed at <https://www.cso.ie/en/csolatestnews/pressreleases/2022pressreleases/presstatementestimatedinflationbyhouseholdcharacteristicsmarch2022/>
- [5] Central Statistics Office, 'Survey on Income and Living Conditions' 2021. Accessed at <https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2021/povertyanddeprivation/>
- [6] Central Statistics Office, 'The Rental Sector in Ireland 2021'. Accessed at <https://www.cso.ie/en/releasesandpublications/fp/fp-trsi/therentalsectorinireland2021/tenants/>
- [7] The Housing Agency, 'Summary of Social Housing Assessments 2021'. Accessed at <https://www.gov.ie/en/publication/f6119-summary-of-social-housing-assessments-2021-key-findings/>
- [8] Central Statistics Office, 'Population and Labour Force Projections' 2018. Available at <https://www.cso.ie/en/releasesandpublications/ep/p-plfp/populationandlabourforceprojections2017-2051/>

Accessing entitlements

One difficulty older people experience is simply accessing their entitlements at all. Other than the State Pension, entitlements available to older people include the Living Alone Allowance, the Telephone Support Allowance, the Household Benefits Package, and the Fuel Allowance. However, there are a range of different qualifications for different benefits, and different ways of applying, so it is not as simple as being entitled to these once you reach pension age.

For the Household Benefits Package, if you are over 70, you are not means tested and don't have to be getting a pension. But for the Fuel Allowance, you are means tested. For the Living Alone allowance, you need to be 66 or over. The GP visit card, which is not means tested, is available for people over 70. Free travel (for those who have access to public transport) is available to people who are over 66.

There are also different ways of applying for each of them. To avail of free travel, an older person needs a public services card. They must send the Living Alone allowance form to the Department of Social Protection. For the GP visit card, they must apply online or download a form and post it to the The National Medical Card Unit.

If they are in receipt or in need of HAP or housing assistance, home care, the drugs payment scheme, housing adaptation grant, carers allowance etc – all supports require different forms, all have different systems and eligibility criteria, and are sent to many different organisations and Government departments. **This makes simply understanding and applying for the relevant entitlements extremely difficult.** It is also administratively burdensome, as the older person must answer the same questions repeatedly across different forms.

It is ALONE's view that by streamlining the documents and processes, older people would more easily engage with the system and the Department would save time and money currently being spent on the administration of various entitlements with complex criteria.

Recommendation:

- Simplify the processes for applying for entitlements to enable ease of accessibility for older people.

For the Department of Social Protection, this would mean:

Developing a 'one-stop shop' approach for accessing and applying for pension, fuel allowance, Living Alone allowance, the Household Benefits package and Telephone Support Allowance. This may mean, for example:

- Adapting the form and process for applying for the State Pension, so that the person does not have to fill out an additional form to apply for the Living Alone allowance, Household Benefits Package and/or Free Travel
- Streamlining of eligibility criteria (eg age at which one becomes eligible for various entitlements) across the entitlements available from this Department, as far as possible.

Pension reform and increase

Benchmarking

Ireland is unusual in that the State Pension is not currently benchmarked against anything – it is at the mercy of political will. It is one of two OECD countries that do not use a formal system of benchmarking. At ALONE, we believe that older people should be provided with an income above the poverty line and this can be achieved through triple-locking and benchmarking the pension system. We believe the benchmark should be to 34% of average earnings, a flat rate of 2.5%, or to match the rate of inflation, whichever is greater.

This will not only help to ensure that older people can receive an adequate income, but also protects pensions when average earnings drop.

A commitment to benchmark the State Pension has been set out. In 2018, a commitment to develop proposals to benchmark the State Pension was published in the *Roadmap for Pensions Reform 2018 – 2023*.

This was expanded on in the *The Roadmap for Social Inclusion 2020-2025*. This states, “This Government has committed to the introduction of a system of benchmarking rates of pension payment both to average wages and to inflation”, with a goal to ‘Apply the benchmark in adjusting Pension changes for Budget 2021’. This goal was not met. If it had, older people today would not be struggling to the extent they are with the increase in cost of living.

The Roadmap for Social Inclusion puts forward a ‘smoothed earnings’ system, where payments would, as a default, be benchmarked against the average earnings measure using the 34% target benchmark commitment of the *Roadmap for Pensions Reform*.

Going off the Government target for benchmarking:

The seasonally adjusted average weekly earnings, as per Q1 2022, were €870.10.¹

34% of this figure amounts to €295.83. This would mean an increase to the Contributory Pension (which stands at €253.30) of more than €42.

Government representatives have stated that we cannot engage in chasing inflation. However, going by the Government’s own commitment to benchmark the pension, the pension must be increased by a rate which is actually greater than that of the current rate of inflation.

Automatic enrolment

ALONE has noted that an automatic enrolment system is to be introduced in Ireland, as outlined in the Programme for Government. However, this has been repeatedly delayed. ALONE encourages the prompt introduction of the system. Research shows that automatic enrolment can increase the number of workers saving into a pension, contributing to higher saving levels. However, it must be noted that Automatic enrolment and resulting increased

¹ <https://www.cso.ie/en/statistics/earnings/earningsandlabourcosts/>

savings of older people should not be used in the years to come as an excuse to reduce the amount of the state pension.

Total Contributions Approach

ALONE also acknowledges the proposed Total Contributions Approach (TCA) model that is due to be implemented by Government this year. Under this model, a person is required to have 40 years of full contributions to qualify for a full Contributory State Pension. The model will also include up to 20 years of a new Home Caring Credits for periods spent in homemaking/caring roles. ALONE acknowledges that this method is an improvement as people who take career breaks will be given lower rates when they retire. However, ALONE is concerned around the lack of knowledge as to how the new system will operate.

ALONE believe that 30 years, which was suggested in the 2010 National Pensions Framework, and in the submission to the Pensions commission by the Joint Committee on Social Protection, Community and Rural Development and the Islands, is a more appropriate amount for the TCA model. ALONE also believe that the number of Home Caring Credits should be greater, at 25 years under this model. This will help minimise the gap between those who provide valuable caring duties with those in employment.

Pension age

We have welcomed the commitment from Government not to increase the pension age to 67 and to defer further increases. Working into our late 60s and beyond should be an option, not an obligation, particularly for older workers engaged in labour-intensive work, such as construction and manufacturing.

Proponents of pension age increases point to an increase in the quality of life, allowing for people to work longer into old age. However, this point of view fails to take into consideration the fact that 126,100 adults over 55 (11 per cent) are living with frailty, which impacts their need to retire early and could also impact their ability to meet contributions for a full pension². Additionally, over 17,000 of these individuals over 55 living with frailty live alone³.

It is also pointed out that maintaining that the current pension age will be financially unsustainable for the State. However, increasing the pension age would not cover the difference in the cost of the pension for the increased population.

² The Irish Longitudinal Study on Ageing, 2020. *TILDA Report on Population Estimates of Physical Frailty in Ireland to Inform Demographics for Over 50s in Ireland during the COVID-19 Pandemic*. [online] Dublin: The Irish Longitudinal Study on Ageing, p.1. Available at: <https://tilda.tcd.ie/publications/reports/pdf/Report_Covid19Frailty.pdf>

³ The Irish Longitudinal Study on Ageing, 2020. *TILDA Report on Population Estimates of Physical Frailty in Ireland to Inform Demographics for Over 50s in Ireland during the COVID-19 Pandemic*. [online] Dublin: The Irish Longitudinal Study on Ageing, p.1. Available at: <https://tilda.tcd.ie/publications/reports/pdf/Report_Covid19Frailty.pdf>

Recommendations:

- Increase the State Pension by a minimum of €20 per week, and commit to reaching the minimum benchmark of €295.80 for Budget 2024. We ask that this two-year commitment is made publicly as part of Budget 2023 to reassure older people currently struggling with the impact of inflation.
- Put in place relevant legislation for formally introducing the benchmarking process, as committed to in the *Roadmap to Social Inclusion 2020-2025*.
- Legislate for and introduce the Automatic Enrolment System.
- Introduce legislation to implement the Total Contributions Approach.
 - Set the model at 30 years, as suggested in the 2010 National Pensions Framework.
 - Increase Home Caring Credits to 25 years under the model.
- Maintain the current State Pension age

Living Alone Allowance

As evidenced earlier in this document, older people living alone are most susceptible to being at-risk-of poverty, experiencing deprivation, and experiencing chronic poverty.

The Living Alone Allowance is a targeted benefit that supports those struggling most. However, like the State Pension, it is not currently benchmarked against anything. The €22 per week does not adequately protect older people against the added cost of living alone. This is surely evidenced by the fact that the rates of poverty are so much greater among this cohort.

MESL figures show that a ‘pensioner couple’ only need to spend 1.27 times that of a ‘pensioner living alone’ to meet the MESL. However, older people living as couples have double the pension income of a single person. This is not indicative that older people living as couples have a significant amount of income to spare, but rather that older people living alone, particularly those in rural areas, experience serious income inadequacy. The Vincentian Partnership for Social Justice MESL figures indicate that an older person living alone in 2021 experienced weekly income inadequacy of €55.32 to meet their minimum essential expenditure needs. Figures released in June by the Vincentian Partnership for Social Justice indicate minimum expenditure required for this group has increased further, by just under €50, to €383.15⁴. As mentioned previously, these figures do not take into account the projected impact of inflation for 2023. Therefore, we at ALONE feel it is vital that older people living alone receive substantial additional support.

There is no reference to the Living Alone Allowance in the *Roadmap for Social Inclusion*. However, **given the significantly increased costs involved in living alone, ALONE would recommend that the Living Alone Allowance is made equivalent to one quarter of the state pension.**

Working off an increased State Pension figure for Budget 2023 of €273.30, this would mean an increase to the Living Alone Allowance from €22 to €68.

We recognise that this is a substantial increase which may not be feasible to achieve in this year’s budget. Therefore, we would recommend that this be implemented over a number of years by increasing the Allowance by €20 this year, and making up the difference to reach one quarter of the State Pension in the 2024 Budget.

Provision must also be made for older people who due to death of a partner, now qualify as living alone but find themselves with a significantly reduced household income. Where a partner has died, ALONE recommend that an older person should be able to continue to claim at least half of their partner’s pension. This would target older people who may newly find themselves in extreme financial difficulty and will enable them to maintain their standard of living.

⁴ https://www.budgeting.ie/download/pdf/pen_core_mesl_r_2022.pdf

Recommendation:

- Increase the Living Alone Allowance by €20 to €42. Commit to benchmarking the Living Alone Allowance to one quarter of the State Pension to target older people most at risk of poverty and deprivation.
- In addition, ALONE recommend that an older person should be able to continue to claim at least half of their partner's pension after they have died, to enable them to maintain their standard of living.

Fuel Allowance

In 2021, 78,378 older people on the Contributory State Pension and 56,640 people on the Non-Contributory State Pension received the Fuel Allowance. The number of recipients of Fuel Allowance in 2021 aged 60 years and older was 214,568.⁵ That is 57% of the total 374,861⁶ recipients of the Fuel Allowance. It is a lifeline for older people.

The Fuel Allowance is €33 per week, and is paid from the end of September to April for 28 weeks.

An extra payment of €125 was paid to people getting Fuel Allowance in the week beginning 14 March 2022. In addition, another extra payment of €100 was paid to people getting Fuel Allowance in the week beginning 16 May 2022. These payments are equivalent to roughly seven additional weeks of payment of the Fuel Allowance. The entire fuel allowance paid to recipients, including additional payments, was €1,149.

We believe these additional payments, which are required, should be formalised so as to provide certainty to people in receipt of the Fuel Allowance. We believe the best way to do this is to extend the Fuel Allowance season to 35 weeks, from the beginning of September to the beginning of May.

The recent ESRI report on ‘Energy Poverty and Deprivation in Ireland’ stated that energy inflation between January 2021 and April 2022 increased the cost of estimated households’ consumption by €21.27 per week, on average⁷. This is a total increase of €1,106 per year. Should energy prices rise by a further 25 per cent, the ESRI also estimate this would increase by an average of €36.57, or €1,901.64 per year.

These figures indicate that the entire Fuel Allowance payable between September 2021 and April 2022, and the additional payments (a total of €1,149), was practically wiped out by the average increase in costs (€1,106) alone – not to mention the base costs. It does not take into account any further increases that may come in 2023, or the base costs.

The Fuel Allowance is payable to a wider cohort than older people on pensions alone, which is why we are looking at average figure for households here. However, we know that 10% of people aged 75+ live in homes with the lowest energy rating (G) compared to just 3% of households with a reference person aged 35-44 years.⁸ About 57% of people aged 75 and over live in BER EFG rated properties.⁹ We also know that among the older population, people living alone, with chronic illness and/or disability, on low incomes, and without central heating or living in poorly insulated homes are most at risk of energy poverty¹⁰. As referenced previously, CSO data shows that people aged 65+ are experiencing among the highest inflation rates at an estimated 7.2%, the main contributors to this being electricity, fuel and

⁵ <https://www.oireachtas.ie/en/debates/question/2022-02-15/495/>

⁶ <https://www.oireachtas.ie/en/debates/question/2022-05-17/488/>

⁷ <https://www.esri.ie/system/files/publications/RS144.pdf>

⁸ Central Statistics Office, 2021, Domestic Building Energy Ratings from a Social Perspective 2016. [online] Available at [Domestic Building Energy Ratings from a Social Perspective 2016 - CSO - Central Statistics Office](#)

⁹ ESRI, Working Paper 249: Estimating Building Energy Ratings for the Residential Building Stock: Location and Occupancy (August 2014). [online] Available at <https://www.esri.ie/system/files?file=media/file-uploads/2016-12/WP489.pdf>

¹⁰ CARDI, Understanding Fuel Poverty in the Older Population, November 2011, [http://www.cardi.ie/userfiles/Fuel%20Poverty%20\(web%20version\)%20\(2\)\(1\).pdf](http://www.cardi.ie/userfiles/Fuel%20Poverty%20(web%20version)%20(2)(1).pdf)

transport.¹¹ It should be considered therefore that the average increase in the cost of energy calculated by the ESRI may be significantly higher for households in receipt of Fuel Allowance.

As of Wednesday 1st June, Minister Eamon Ryan stated that “a review of the implementation of the *Strategy to Combat Energy Poverty 2016-2019* will be completed in the coming weeks to inform future policy in this area”¹²; however, it has not been updated post-2019. We would urge that the current strategy is updated as soon as possible, but do not expect this to be completed and recommendations introduced ahead of Budget 2023.

Therefore, in the interim, ALONE would urge that the Fuel Allowance period is extended to 35 weeks, and the amount is increased by a minimum of €20 per week – in effect, doubling the current Fuel Allowance.

Recommendations

- Urgently review the implementation of the Strategy to Combat Energy Poverty 2016-2019, and commit to updating the Strategy (Department of the Environment, Climate and Communications) and implementing new measures (Department of Social Protection).
- Extend the Fuel Allowance season from 28 to 35 weeks, from the beginning of September to the beginning of May, and increase the amount from €33 per week to €53 per week.

¹¹ <https://www.cso.ie/en/csolatestnews/pressreleases/2022pressreleases/presstatementestimatedinflationbyhouseholdcharacteristicsmarch2022/>

¹² <https://www.oireachtas.ie/en/debates/question/2022-06-01/71/?highlight%5B0%5D=strategy&highlight%5B1%5D=combat&highlight%5B2%5D=energy&highlight%5B3%5D=poverty>

Exceptional and Urgent Needs Payments

ALONE staff have highlighted that in recent years, access to HEOs in the Department of Employment Affairs and Social Protection (formerly Community Welfare Officers or CWOs) has become limited, decreasing the ability for people to access the Exceptional and Urgent Needs Payments.

Granting of the Exceptional Needs Payment “*are at the discretion of the officers administering the scheme*”¹³. Since 2019, the number of Exceptional Needs Payments and Urgent Needs Payments granted have decreased from 92,198 in 2019, to 67,589 in 2020, down to 55,552 in 2021¹⁴.

However, the average payment has increased. Expenditure on the Additional Needs Payments is relatively stable, at €43.2m in 2019, €41m in 2020, and €42.4m in 2021. These figures would indicate an increase in the average grant amount from €469 in 2019, to €763 in 2021. This is an increase of almost 63%.

Government has provided €45.75 million for the exceptional and urgent needs schemes in 2022. It is noted that the scheme is “demand-led” and that “the payments target those most in need of assistance”.

ALONE is concerned that the reduction in the number of Exceptional and Urgent Needs Payments granted, while the amount of the average grant increased, does not indicate a reduction in demand, but a reduction in the number of successful applications and a higher level of need for these grants. In ALONE’s experience, successful applications for the Exceptional Needs Payment can depend on individual HEOs as well as geographical location.

Anecdotally, ALONE staff have highlighted that in more rural areas the criteria for granting the payment is higher compared to more urban areas. The process lacks consistency and there needs to be a unified approach to the payment.

With additional hardship being experienced by older people than before, ALONE believes that a review of the Exceptional Needs Payment is needed to ensure that it is operating effectively, especially in light of increased cost of living.

Recommendations

- Review the Exceptional and Urgent Needs Payments schemes, including a note of the total number of applications and rate of success. Streamline the criteria for application nationwide.

¹³ <https://www.oireachtas.ie/en/debates/question/2022-06-21/616/>

¹⁴ Ibid

Summary of recommendations

Department of Health

1. Update, fund and implement the National Positive Ageing Strategy

- Complete a review and update of the National Positive Ageing Strategy
- Develop a whole-of-government interdepartmental implementation plan, with timelined actions assigned
- Commit funding to the implementation of the strategy

2. Establish the Terms of Reference for the Commission on Care

- Expedite an urgent review of the experiences of older people during the pandemic, and make short to medium-term recommendations to Government and policy-makers on actions to be carried out to mitigate against its worst impacts.
- Continue work on reviewing strategies relating to older people and engage in a review of care and support for older people in order to make longer-term policy recommendations. Engage in dialogue with older people themselves; the community and voluntary sector, including ALONE; and organisations working with older people in order to conduct this review and make recommendations.

3. Resource the Home Support Scheme to meet increased demand in light of the forthcoming Statutory Home Care Scheme

- Commit to multi-year funding increases to the Home Support Service in line with changing demographics, inflation and other cost increases
 - Commit to delivering a minimum of 23.67 million hours of Home Support in Budget 2023
 - Create a specific fund for recruitment, training and incentivisation of home care workers, separate to the Home Support budget, to help to ease difficulties around workforce creation and retention
 - Increase the Flat Rate Expenses allowance for Home Help workers from €256 pa to €353 (in line with Hospital Domestic Staff)
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4. Review funding of day care centres for older people

- Review of the reopening of day care centres to establish the reasons for delays among some
- Carry out a funding review of day care centres and link funding to demographic needs to ensure older people receive the level of care appropriate to their needs

5. Complete strategic review of GP services

- Include the voices and needs of older people in considering the future of the services
- Ensure there are no additional costs for medical card patients receiving blood tests or transport costs for blood tests

6. Address loneliness among the general population, as committed to in the Programme for Government

- Establish a €5 million Loneliness Fund
- Develop a national plan aimed at addressing loneliness across the life course, taking into consideration the need for a 'whole-of-government' approach that captures direct and indirect influencing strategies across different government departments.
- Commission research to explore the wellbeing, health and work productivity cost of loneliness in Ireland.
- Nationwide public awareness campaign that highlights loneliness and social isolation, which portrays a diverse range of populations to address stereotypes and directs people to support if they are lonely or how to support someone who is lonely.
- Support the establishment of a Centre for Studies on Loneliness and Isolation
- Carry out a scoping exercise and consultation to develop a common measurement tool of loneliness across the life course.
- Implement the five recommendations in 'Building Capacity for the Evaluation of Social Prescribing'.
- Create a centralised location of resources on training and education on loneliness.

7. Expedite actions relating to older people from the 'Sharing the Vision' Implementation Plan

- Expedite the recommendations and actions relating to older people from the 'Sharing the Vision Implementation Plan 2022-2024' in light of the negative impact of COVID-19 on the mental health of older people
- Publish quarterly progress reports on the implementation of 'Sharing the Vision' on gov.ie

Update, fund and implement the National Positive Ageing Strategy

ALONE and other organisations working with older people (including our colleagues in the Age Alliance) have repeatedly called for the National Positive Ageing Strategy (NPAS) to be implemented. The Strategy is now almost ten years old. To date, an implementation plan for NPAS has not been published or specific actions funded.

ALONE is calling for NPAS to be reviewed and updated, and for an implementation plan with clear objectives and actions to be written, funded and delivered, in collaboration with older people themselves and organisations involved in working with older people.

Recommendations:

- Complete a review and update of the National Positive Ageing Strategy
- Develop a whole-of-government interdepartmental implementation plan, with timelined actions assigned
- Commit funding to the implementation of the strategy

Urgently expedite the activities of the Commission on Care, as committed to in the Programme for Government¹⁵

In the Programme for Government, a commitment was made to establish a Commission on Care: “Learning from COVID-19, we will assess how we care for older people and examine alternatives to meet the diverse needs of our older citizens. We will establish a commission to examine care and supports for older people.”

Two years on, this Commission has not been formally established. Minister Mary Butler indicated in March this year that initially, an extensive review of age-related strategies was to take place, which would “strengthen older person policies and strategies” and “ensure the needs of communities across Ireland are accurately reflected in the Terms of Reference and subsequent work of the commission.”¹⁶

While this diligence is commendable, ALONE believe that elements of this work need to be urgently expedited and include a review of the experiences of older people during the pandemic. Two years on, the Commission should be significantly further ahead in its activities than developing Terms of Reference.

A significant body of evidence has been gathered which indicates the detrimental impact the COVID-19 pandemic has had on older people.

Lived Experience of Older People

A snapshot of some of the calls received by ALONE capturing the lived experiences, issues, concerns and challenges that older people faced and continue to face during this COVID-19 pandemic.⁴



4. ALONE (2020). COVID-19 Response and Weekly Activity Report.

¹⁵ <https://www.gov.ie/en/publication/7e05d-programme-for-government-our-shared-future/>

¹⁶ <https://www.oireachtas.ie/en/debates/question/2022-03-01/608/>

Evidence suggests that COVID and resulting lockdowns and isolation had a severely detrimental impact on the physical and mental health of older people¹⁷;

- Nearly 40 per cent of older people reported that their mental health was ‘worse’ or ‘much worse’ while cocooning.
- Nearly 60 per cent of older people reported loneliness; 1 in 8 reported that they were lonely ‘very often’.
- Nearly 70 per cent of older people reported exercising less frequently or not at all

Similarly, the HSE’s interim report on the impact of cocooning¹⁸ has also highlighted the likely long-term impacts on older people’s physical and mental health; including increased risk of cognitive decline and depression, cardiovascular disease, diabetes, osteoporosis and fractures, physical frailty, and decrease in quality of life.

These impacts are being experienced by older people today. Thus far, no actions have been recommended by the Commission on Care.

Therefore, ALONE would recommend a dual approach to be taken by the Commission:

- A short to medium term view, considering urgent recommendations to be actioned in the short to medium term to improve the lives and wellbeing of older people who are still feeling the impact of the pandemic.
- A long term view, considering the approaches to be taken long-term to care and support of older people, including housing options for older people, the home support and nursing home schemes, and other significant areas.

Recommendations:

- Establish the Terms of Reference for the Commission on Care.
- Expedite an urgent review of the experiences of older people during the pandemic, and make short to medium-term recommendations to Government and policy-makers on actions to be carried out to mitigate against its worst impacts.
- Continue work on reviewing strategies relating to older people and engage in a review of care and support for older people in order to make longer-term policy recommendations. Engage in dialogue with older people themselves; the community and voluntary sector, including ALONE; and organisations working with older people in order to conduct this review and make recommendations.

¹⁷ Bailey, L., Ward, M., DiCosimo, A., Baunta, S., Cunningham, C., Romero-Ortuno, R., Kenny, R., Purcell, R., Lannon, R., McCarroll, K., Nee, R., Robinson, D., Lavan, A. and Briggs, R., 2021. Physical and mental health of older people while cocooning during the COVID-19 pandemic. *QJM: An International Journal of Medicine*.

¹⁸ <https://www.hse.ie/eng/services/publications/olderpeople/interim-report-on-the-impact-of-cocooning-measures-on-older-people.pdf>

Resource the Home Support Scheme to meet increased demand in light of the forthcoming Statutory Home Care Scheme

Funding for the Home Support Scheme has increased significantly in recent years, which has been welcomed by ALONE. An additional 5 million hours were funded in 2021, a budget increase of roughly €150 million¹⁹.

This was carried on into 2022. The National Service Plan for 2022 provides for rollover of the 2021 target levels of service into 2022, inclusive of the additional 5 million hours funded in 2021 to 23.67 million hours nationally²⁰.

Status of Home Care in 2021 and 2022:

- HSE figures show that in 2021, **55,043 people** received home care through the HSE Home Support Services, equating to **20.46 million hours** of home support. This is 93.6% of the targeted hours of 21.9 million.
- **Intensive Home Care Packages have been difficult for the HSE to deliver. Less than half of the targeted number of people received Intensive Home Care Packages in 2021.** For hours provided by Intensive Home Care Packages, targets were 360,000 hours; 246,374 hours were delivered, 68.4% of the target. The target for people in receipt of intensive Home Care Packages was 235 people. These were delivered to 115 people – 48.9% of the target.
- As of end 2021 – 20,463,216 Home Support hours were delivered nationally, of which 12.9m hours were delivered by private and voluntary providers. **This means that private and voluntary providers delivered roughly 63% of all home support in 2021¹.**
- **A significant number of people are waiting for carers to become available.** As of end March 2022; 5,136,354 Home Support hours were delivered nationally to 55,080 people. Also, as of this date, there were 286 people assessed and waiting for funding for new or additional home support, while **5,458 people were assessed and approved for Home Support but were awaiting a carer to be assigned.¹**
- As of 7 June, 531 patients nationally were waiting to be discharged from hospital. **A total of 96 patients were waiting to be discharged home with home supports, with 59 waiting on a carer to become available¹.**

Research by Home and Community Care Ireland notes that before the COVID-19 pandemic, the waiting list for funding for home care was higher than the waiting list for home care workers; however, “the pandemic brought an urgency to keep people in their homes and out of congregated settings”, resulting in increased funding to the service.

¹⁹ <https://www.oireachtas.ie/en/debates/debate/dail/2022-06-14/31/>

²⁰ <https://www.hse.ie/eng/about/personal/pq/pq/2022-pq-responses/march-2022/pq-12975-22-roisin-shortall.pdf>

²¹ <https://www.hse.ie/eng/about/personal/pq/pq/2022-pq-responses/january-2022/pq-1926-22-paul-murphy.pdf>

²² <https://www.hse.ie/eng/about/personal/pq/pq/2022-pq-responses/may-2022/pq-22042-22-verona-murphy.pdf>

²³ <https://www.oireachtas.ie/en/debates/debate/dail/2022-06-14/31/>

These figures highlight once again that the primary difficulty with providing home care hours is not primarily funding as it was in the past, but workforce availability. However, funding to the home support service **must remain consistent and continue to increase to meet demand**, in preparation for the implementation of the Statutory Home Support Scheme.

As we know, the Department is currently working towards the introduction of a statutory home support scheme. It is important to note that as developments are made to the service (for example, better pay and working conditions for home care workers), there may be a resulting increase in cost of delivery of home support, particularly if options around financing the scheme have not yet come into place.

Therefore there must also be a commitment to maintain the number of hours being delivered currently at a minimum, with funding increases to achieve this if necessary. Increases in the cost of providing the service must not impact the service being delivered to older people and people with disabilities.

We are also calling for the creation of a separate fund managing additional funding for mitigating the current workforce challenges. This separate fund should aim to deliver:

- A nationwide recruitment campaign to promote the role of home care workers and encourage people of all ages into the profession, along with increase in capacity for local recruitment and targeting. Highlight the variety within the role - different levels of expertise that would meet people's needs. Dementia-specific home care is typically complex and therefore additional attention is required when selecting potential candidates.
- Incentivise pay packages to attract home care workers into the profession. In general, home care is low paid and undervalued work. The additional skills and expertise required in delivering dementia-specific home care are often not reflected in remuneration. There is a critical need to standardise home care rates of pay and benefits across Ireland. The introduction of approaches to support home care workers to protect their income and entitlements should also be considered in the context of COVID-19.
- Invest in the promotion of access to training, career pathways and continuous professional development, and promote greater access to FETAC/QQI training for migrants employed in the sector.

It should be noted that the recent ESRI report on Demand for the Statutory Home Support Scheme states that, "When we include increases in support to recipients, substitution of LTRC [long term residential care] for home support and expansion of demand, simulated demand for home support increases by over 13,000 people, or by over 30,000 people being supported by public home support. Were this to occur, we project that this would result in 12.5 per cent of all over-65s living at home in Ireland receiving home support through a new statutory scheme"²⁴.

It is likely that due to increased demand, the Home Support Service will require significant additional funding in the coming years. Government must start preparing for this now and committing to multi-year funding increases to the service.

²⁴ <https://www.esri.ie/system/files/publications/RS122.pdf>

Recommendations:

- Commit to multi-year funding increases to the Home Support Service in line with changing demographics, inflation and other cost increases
- Commit to delivering a minimum of 23.67 million hours of Home Support in Budget 2023
- Create a specific fund for recruitment, training and incentivisation of home care workers, separate to the Home Support budget, to help to ease difficulties around workforce creation and retention
- Increase the Flat Rate Expenses allowance for Home Help workers from €256 pa to €353 (in line with Hospital Domestic Staff)

Review of funding of day care centres for older people

Through our work with older people, ALONE have been made aware that some day care centres have not reopened since the COVID-19 pandemic and that some older people have been left without appropriate levels of care as a result. Some of the centres which have reopened, are providing lower levels of care – for example, an older person who had previously been attending for four days a week, now being offered one day of care.

Several of the centres have not reopened at all, and older people are being redirected to other centres, which are generally less convenient to them. Minister Butler cited recently that about 85% of Day Care Services for Older People are open and have resumed service and by the end of 2022 it is expected that 92% of Day Care Centres will have resumed the service²⁵. It had previously been cited that at the end of April 264 centres had reopened, representing about 80% of centres which had planned to reopen.²⁶

These figures indicate that there are roughly 50 day care centres nationwide which have not resumed service but plan to reopen. This figure does not include day centres which will remain closed.

We believe that the delay in some centres reopening is for a number of reasons, including increased costs of operation.

ALONE is calling for an urgent review of the reopening of day care centres for older people to establish the reasons for delays, and carry out a funding review to enable older people to receive the level of care appropriate to their needs.

Recommendations:

- Review of the reopening of day care centres to establish the reasons for delays among some
- Carry out a funding review and link funding to demographic needs to ensure older people receive the level of care appropriate to their needs

²⁵ <https://www.oireachtas.ie/en/debates/question/2022-07-05/873/>

²⁶ <https://www.oireachtas.ie/en/debates/question/2022-05-26/32/>

Strategic review of GP services

The Sláintecare Action Plan 2022 includes a goal to ‘Initiate strategic review of GP services to develop vision for future of GP services’²⁷. It also cites the Enhanced Community Care Programme, ECC Programme, aligned to the 2019 GP Contract Agreement, the objective of which is “to deliver increased levels of healthcare with service delivery reoriented towards general practice, primary care and community-based services”.

ALONE encourages the prompt undertaking of this review of GP services, particularly in the context of COVID-19. The experience of older people we work with is that some GP services have moved primarily to telephone assessments since the pandemic. This has led to a reduction in confidence in GP services, with some older people citing avoidance of making GP appointments as a result.

Recommendations:

- Complete strategic review of GP services and include the voices and needs of older people in considering the future of the services
- Ensure there are no additional costs for medical card patients receiving blood tests or transport costs for blood tests

²⁷ <https://www.gov.ie/en/publication/0d2d60-slaintecare-publications/#slaintecare-action-plan-2022>

Loneliness

We are becoming more aware of the impact loneliness and social isolation has on one's physical and mental health. It is a silent and unrecognised social epidemic, affecting many different ages and cohorts. The COVID-19 pandemic has brought this issue to the fore with limiting social interactions a key tool in the fight to control the spread of the virus. There can be no doubt that these measures have led to increased social isolation and loneliness across the population.

Loneliness is quite often higher amongst those in ill health, on lower incomes, those who are unmarried, living alone or who have lower levels of education. Further research has also highlighted other groups who are more at risk of loneliness;

- Members of the LGBT community
- People living with dementia or a cognitive impairment
- People with a physical disability, mobility issues, or an intellectual disability
- Carers
- People from ethnic minorities
- People with pre-existing mental health difficulties

Loneliness has been generally considered to be more associated with or prevalent among older people, with different cohorts of the population being at a greater risk of experiencing loneliness and social isolation. Loneliness, however, is a feeling that most people have experienced at some point in their lives. With COVID-19, levels of loneliness have increased across the population, with damaging mental health impacts. From the Central Statistics Office (CSO) 'Social Impact of COVID-19 Survey' it is clear that levels of loneliness have been increasing. This is also the case among older people.

Through our work with older people, ALONE have been made aware that community social activities for older people nationwide have not fully been reinstated since COVID. This may be due to a variety of reasons, including lack of funding, reticence due to the pandemic, and fear/worry on behalf of the older people involved to get back to social activities.

ALONE is a member of the Loneliness Taskforce. The Loneliness Taskforce is a coalition of organisations and individuals who work to address loneliness. The purpose of the Taskforce is to increase awareness of loneliness and to continually advocate for policy change to address loneliness at a local and national level. Our vision is an Ireland free from loneliness.

The Loneliness Taskforce is chaired by Dr John Hillery. Its membership consists of: ALONE, The Alzheimer Society of Ireland, Acquired Brain Injury Ireland, Disability Federation of Ireland, Family Carers Ireland, Prof Roger O'Sullivan, Prof Brian Lawlor, The Irish Longitudinal Study on Ageing, Samaritans Ireland, Mental Health Reform, Muintir na Tíre, Jigsaw, The National Women's Council of Ireland, and LGBT Ireland.

Recommendations of the Loneliness Taskforce:

1. Develop a national plan aimed at addressing loneliness across the life course, taking into consideration the need for a ‘whole-of-government’ approach that captures direct and indirect influencing strategies across different government departments.

1.1 A consultation process should begin to develop a plan on addressing loneliness. This consultation process will seek to carry out focus groups with key stakeholders (NGOs, state bodies, government officials, PPNs, etc) and will deliver a plan which is action-focused. One way of carrying out this consultation process is through the Loneliness Taskforce facilitating, as the group has expertise in the area.

2. Minister for Public Health to lead on addressing loneliness and the implementation of a plan on loneliness

3. Commission research to explore the wellbeing, health and work productivity cost of loneliness in Ireland.

4. Carry out a scoping exercise and consultation to develop a common measurement tool of loneliness across the life course. We believe that the Central Statistics Office is best suited to this.

5. To ensure that investment is made in interventions that are proven to reduce loneliness, **a €5 million Loneliness Fund should be established**. This fund will help organisations invest in evaluations to demonstrate the impact of their work on addressing loneliness.

6. Implement the five recommendations in ‘Building Capacity for the Evaluation of Social Prescribing’.

7. Nationwide public awareness campaign that highlights loneliness and social isolation, which portrays a diverse range of populations to address stereotypes and directs people to support if they are lonely or how to support someone who is lonely.

7.1 Create a centralised location of resources on training and education on loneliness. 7.2 Utilise local community fora, PPNs and other forums to share training and education resources.

8 Support the establishment of a Centre for Studies on Loneliness and Isolation

8.1 Allocate budget for research on loneliness in future research funding calls

8.2 Support the development of research networking and capacity building in the area of loneliness

‘Sharing the Vision’ and mental health services for older people

As we know, older people are exposed to multiple risk factors that contribute to poor mental health such as reduced mobility, chronic pain, illness, loneliness, loss and bereavement. In light of our ageing population it is particularly important to promote mental health among this group.

In many senses, ‘Sharing the Vision’ represents a step forward in mental health care in Ireland and among older people. The ‘Sharing the Vision Implementation Plan 2022-2024’ contains several recommendations and associated actions which ALONE supports, including:

Recommendation 5: New and existing community development programmes which promote social inclusion, engagement and community connectedness should be appropriately resourced and developed, in line with the proposed national mental health promotion plan.

Recommendation 12: A range of actions designed to achieve the goals of the National Positive Ageing Strategy for the mental health of older people should be developed and implemented, supported by the inclusion of mental health indicators in the Healthy and Positive Ageing Initiative’s research programme.

Recommendation 15: Social prescribing should be promoted nationally as an effective means of linking those with mental health difficulties to community-based supports and interventions, including those available through local voluntary and community sector supports and services.

Recommendation 42: Individuals who require specialist Mental Health Services for Older People (MHSOP) should receive that service regardless of their past or current mental health history. People with early-onset dementia should also have access to MHSOP.

Recommendation 89: Access to safeguarding teams and training should be provided for staff working in statutory and non-statutory mental health services in order to apply the National Safeguarding Policy.

Given the impact of cocooning and the COVID-19 pandemic more generally on the mental health of older people, ALONE would recommend that these actions and particularly Recommendation 12 should be prioritised and expedited. As referenced earlier, nearly 40 per cent of older people reported that their mental health was ‘worse’ or ‘much worse’ while cocooning. It is vital that older people are supported via mental health services to regain confidence and positive mental wellbeing in the aftermath of the worst of the pandemic.

The ‘Sharing the Vision Implementation Plan 2022-2024’ states that “Monitoring of this implementation plan will be ongoing, with formal reports of progress towards specific recommendations produced quarterly”²⁸. We would encourage that these reports are published to gov.ie to promote transparency and visibility throughout the lifespan of the ‘Sharing the Vision’ plan.

²⁸ <https://assets.gov.ie/219435/7a8c78e1-98ad-4542-9a61-a13195a727d6.pdf>

Recommendations:

- Expedite the recommendations and actions relating to older people from the 'Sharing the Vision Implementation Plan 2022-2024' in light of the negative impact of COVID-19 on the mental health of older people
- Publish quarterly progress reports on the implementation of 'Sharing the Vision' on gov.ie

Summary of recommendations

Department of Housing

1. Fully implement and fund actions relating to the Joint Policy Statement: 'Housing Options for our Ageing Population'

- Reconvene the Implementation Group for the Joint Policy Statement in order to establish the barriers they experienced in implementing the actions recommended, and report on this
- In the interim of the development of a new framework for the two Departments to work together on joint co-operative policy making, establish a working group to continue the work of the Implementation Group for the Joint Statement
- Issue a timeline for delivery of the actions which have not yet been completed

2. Develop a long-term plan for housing for older people, including those in the private rental sector

- Develop a long-term plan specifically on housing provision for older people, including provision of support to older people in the private rented sector.
- As committed to in Housing for All, 'support pilots of innovative forms of housing redesign/reorganisation to deliver additional rental accommodation supply along with support for older homeowners'. Commit also to developing a report on these pilot projects to encourage further innovation and uptake.

3. Undertake a full review of the Local Authority Housing Delivery Action Plans in the context of providing age-friendly social housing

- Undertake a full review of the Local Authority Housing Delivery Action Plans in the context of age-friendly housing provision and mandate provision of age-friendly and universal design homes for older people in line with population projections
 - Publish all Local Authority Housing Delivery Action Plans
 - Streamline supports provided across Local Authorities, such as right-sizing incentives
-

4. Increase funding to Housing Adaptation Grants for Older People

- Commit to multi-annual increases to the Housing Adaptation Grant schemes
- Increase funding to Housing Aid for Older People scheme to €84.5 million annually, in line with need and demand

5. Deliver choice in housing and Housing with Supports

- Develop and deliver a funding mechanism for AHBs and other agencies to deliver Housing with Supports

5. Deliver targeted interventions to prevent homelessness amongst older people

- Develop, deliver and fund targeted interventions to prevent homelessness amongst older people
- Ensure homeless accommodation and supports provided take account of increased frailty and additional needs experienced by older people

6. Focus on interventions that have real potential to deliver results

- Avoid focusing on homes vacant due to nursing home occupancy, and focus instead on interventions that can deliver solutions in the best interest of older people

Fully implement and fund actions relating to the Joint Policy Statement: Housing Options for our Ageing Population

The Joint Policy statement released by the Departments of Health and Housing was warmly welcomed as a significant step forward in housing policy for older people, and organisations supporting older people have described it as being key to planning for the housing needs of our ageing population. However, the reports from the Implementation Group have indicated that the Group has now ended their reporting on the progress of the implementation of the actions identified in the Statement. This is despite the fact that many of the actions identified have not been implemented, something that is acknowledged by the Implementation Group itself. The final report, which was uploaded on June 2nd this year, states that “More in-depth consideration of outstanding Actions at Subgroup level has concluded that advancing the objectives of these actions may require revised perspectives and approaches”.²⁹

The report also states that “To address these [outstanding actions], and to maintain the momentum established since 2019 to the linked policy issues that are so vital to older persons policy the two Departments are developing a new framework for joint co-operative policy making and implementation, at national and local level, for housing and supports for our increasing ageing population. These remaining actions will form a key element of the work programme envisaged under this framework and will be advanced and concluded in this way.”

As there has been no further update on the gov.ie website page since this report was published in June, it cannot be established what has been done so far to implement this new framework. Nor is there a timeline for delivery of the remaining actions.

It should be noted that in the original policy statement, all the actions had a deadline to commence or complete. The latest of these was ‘Commence 2021’, in relation to the Home Support Scheme, with the vast majority of other deadlines in 2019.

The Implementation Report was released on the 2nd June 2022, but was written in 2021. There are to be no more reports from the group. Therefore, we must take these current reports on the actions having been carried out as ‘final’, as no information has been published to the contrary.

ALONE’s analysis of the Implementation Report shows that the majority of the actions in the report have not been fully completed. In many cases, activities have been carried out relating to the action, but not the action itself; other actions are ongoing.

Just ten of the actions appear to have been fully completed. Not all of these have been completed to best practice standards.

Thirteen of the actions have not been achieved and it appears there is no ongoing activity to complete them.

- For example, **Action 4.3** – *Review guidance in the area of development contribution exemptions. The aim is to incentivise particular forms of development in high-density urban areas.*
- The action associated with this reads “...A paper setting out the key issues has been prepared and consultation has taken place with the CCMA Land Use and Transportation Committee. The Committee advised **postponement of this recommendation due to the potential impact on LA finances.**”

²⁹ <https://assets.gov.ie/226143/5d6ed6ca-94b7-441f-b3bb-97a2c668cc81.pdf>

- For example, **Action 4.12** – *Issue planning guidelines for the development of residential care homes and primary care centres to ensure that they are appropriately designed and located in areas with access to transport and amenities.*
- The action reported is simply “DHLGH have no plans to issue any formal Section 28 Planning guidelines at this time”.

Fourteen of the actions are incomplete, but activity appears to have been ongoing at the time of writing the report.

- For example, **Action 4.6:** *“In partnership with industry, introduce measures to ensure that over a five year period delivery is increased to ensure that 30% of all new dwellings are built to incorporate universal design principles”*
- The action carried out in association with this is reported as: “A Cost Benefit Analysis of Universal Design (which is also required in connection with the National Disability Inclusion Strategy 2017 to 2021) is being carried out by the National Disability Authority (NDA).”

A Technical Advisory Group (TAG) has been assembled to oversee the project and has held both bilateral and joint meetings with the other stakeholders, but there is no reference to any industry partnerships.

Two of the actions have been somewhat completed, but not in line with the values of the original policy statement. These are:

Action 4.1, which includes ‘*Increase the funding of the Housing Adaptation Grant Scheme*’ references that the scheme has increased funding for 2022. However it does not commit to increased funding on an ongoing basis.

Action 5.3, which includes ‘*Introduce (on a pilot basis) a community grant scheme for older people services for community and voluntary groups*’. Although this scheme did take place, there is no information that suggests a review of the pilot was carried out and it appears to have simply been shelved.

ALONE has carried out a full review of the implementation of the Joint Policy Statement which is available upon request. ALONE believe that it is unacceptable to conclude the activities of the Implementation Group when so many of the actions remain incomplete.

Recommendations:

- Reconvene the Implementation Group for the Joint Statement in order to establish the barriers they experienced in implementing the actions recommended, and deliver a report on this to ensure improvement for future policy delivery

- In the interim of the development of a new framework for the two Departments to work together on joint co-operative policy making, establish a working group to continue the work of the Implementation Group for the Joint Statement
- Publish a timeline for delivery of the actions which have not yet been completed

Develop a long-term plan for housing for older people, including those in the private rental sector

Statistics have shown that more and more of the general population are renting for longer, including into retirement age and beyond as housing and rental costs have skyrocketed. From 1991 – 2016, there has been a 12 per cent increase in the number of over 80s renting, and a 49 per cent increase in over 85s renting³⁰. The 2016 Census indicated that 2.4 per cent of the over 65s and 10 per cent of people between 50 and 54 are renting from private landlords, a proportion we expect to have increased in the 2022 Census.

The State Pension is not designed to include housing costs. Although a lower percentage of older people are renting compared to other cohorts, the rental crisis has a particularly significant impact on this group as they are on a fixed income, with minimal means to increase the amount they are paying in rent. According to the CSO, close to half (49.5%) of tenants who are 65 or over are spending more than 35% of their disposable income on rent. This is just over a third (33.8%) for tenants who are under 30 while only 23.4% of those between 30 and 44 are spending over 35% of their income on rent.³¹ This indicates an extremely tight situation for older people renting currently, and with the numbers of older renters set to increase the problem will only get worse.

The recent report by the ESRI, 'Future Trends in Housing Tenure and the Adequacy of Retirement Income' estimates that just 65% of those currently aged 35-44 are likely to become homeowners by retirement given current trends, compared to 90% of those currently aged more than 65³². It also suggests that these reductions in homeownership could raise the proportion of older people living in income poverty from 14% at present to as high as 31%.

Addressing housing affordability for older people, especially for those in the private rented sector, emerges as a critical concern. While measures such as the application of rent ceilings in rent pressure zones and access to housing subsidies, such as HAP and RAS, are important supports in enabling housing affordability for older people, many older people are still unable to meet rental demands in their locations of choice.

At ALONE we welcome the introduction of indefinite tenancies and it is noted that by 2028, all tenancies will be of unlimited duration. However for those whose tenancies were created before 10 June 2022, landlords can terminate the tenancy at the end of the six-year period without giving a reason, as allowed under the old rules. For older tenants today, this will still be a cause of concern.

The private rental sector is not considered suitable for most older people. This is for several reasons, including lack of security of tenure, inability to adapt the home as needs change, and the previously mentioned cost burden.

Recommendations:

- Develop a long-term plan specifically on housing provision for older people, including provision of support to older people in the private rented sector. Consider other European countries (eg Italy, Portugal, Sweden, Germany, the Netherlands), which provide a good example of how long-term leasing can help support older people in the rental market and ensure security of tenure.

³⁰ Central Statistics Office, n.d. *Census of Population 2016 - Profile 1 Housing in Ireland*. [online] Central Statistics Office. Available at: <<https://www.cso.ie/en/releasesandpublications/ep/p-cp1hii/cp1hii/tr/>>

³¹ <https://www.cso.ie/en/releasesandpublications/fp/fp-trsi/therentalsectorinireland2021/tenants/>

³² <https://www.esri.ie/system/files/publications/RS143.pdf>

- As committed to in Housing for All, 'support pilots of innovative forms of housing redesign/ reorganisation to deliver additional rental accommodation supply along with support for older homeowners'. Commit also to developing a report on these pilot projects to encourage further innovation and uptake.

Undertake a full review of the Local Authority Housing Delivery Action Plans in the context of providing age-friendly social housing

We also see the impact the housing crisis has had through increasing numbers of older social housing applicants. Among social housing applicants, those aged 60-69 and 70+ are the only age groups to have seen an annual increase in the number of applicants since 2017. The Summary of Social Housing Assessments 2021 also shows that more than 1 in 4 social housing applicants are now aged 50 or over.³³

These figures and others would indicate that this trend is likely to continue and that a higher number of older people will go on to experience further difficulties in the coming years unless action is taken.

The primary action needed is a significant increase in the numbers of Local Authority new builds which are built to Universal Design standards and which are suitable and affordable for older people.

‘Housing For All’ contains a number of goals around providing Local Authority Housing for older people. These include:

“Local Authority Housing Delivery Action Plans will set out how dedicated social housing provision appropriate to the needs of older people will be delivered matching the scale and extent of housing need for older people identified.”

“Local Authorities will consider the housing needs of older people through the Housing Need and Demand Assessment Ongoing LAs Framework and feed that into their Housing Strategies as part of their Development Plan process.”

While these actions are welcomed, it is clear that there is an uneven implementation of recommendations across different Local Authorities. Local Authority Housing Delivery Action Plans for the period 2022-2026 were sent to the Department of Housing in December 2021 for review, with Minister Darragh O’Brien stating that these would be published by the end of June this year³⁴. At the time of writing (July 2022) not all of these plans appeared to be available, meaning a full analysis could not be carried out.

Several of the published plans included passing reference to housing for older people or age-friendly strategies, but no written commitment to age-friendly units.

For example, Carlow County Council identifies that “Housing is a key part of building an age-friendly county. The Strategy finds some over-70s report difficulties maintaining their homes, with adaptation of existing homes and providing age appropriate new homes identified as key issues”³⁵. It also references the Carlow Age-Friendly Strategy, and states that part of housing policy is “To provide housing appropriate to the needs of the elderly, persons with disabilities, lone parents, Travellers, and the homeless. The Council shall support and promote the use of Universal Design principles and Lifetime Homes in new housing developments to meet the needs of diverse groups and an aging population”.

However, there is no reference in the Local Authority Housing Delivery Action Plan for a targeted number of units of age-friendly housing or for a percentage of new builds that will incorporate age-friendly or Universal design.

Similarly, some Action Plans only mention a small number of age-friendly units. For example, Tipperary County Council has identified a Social Housing Delivery Target of 1125 units for the period 2022 to 2026³⁶. Of its age-friendly responsibilities, the Local Authority website says “Tipperary

³³ <https://assets.gov.ie/219921/a5419e65-a5ff-4c84-80de-1f18919e0c73.pdf>

³⁴ <https://www.oireachtas.ie/en/debates/question/2022-06-23/55/>

³⁵ <https://consult.carlow.ie/en/system/files/materials/376/Appendix%204%20Housing%20Strategy%20and%20HNDA.pdf>

³⁶ <https://www.tipperarycoco.ie/housing-delivery-action-plan>

County Council is piloting an age friendly project at Gantley Road, Roscrea which will deliver in the region of 14 units in conjunction with an RRDF application. We are also open to proposals from Approved Housing Bodies". This means just 1.2% of the total social housing delivery target is age-friendly housing.

Regarding supported housing schemes, ALONE has previously estimated that 45,905 shared and supportive housing units are needed through social housing³⁷ based on population projections to 2031. It is clear that unless higher targets are set, nowhere near this number will be achieved.

We would urge that proper attention is paid to the provision of age-friendly social housing nationwide. This is also vital in the context of increasing applicants for social housing aged 50+ and the ESRI publication, referenced previously, citing that just 65% of those currently aged 35-44 are likely to become homeowners by retirement given current trends, compared to 90% of those currently aged more than 65³⁸.

Recommendations:

- Undertake a full review of the Local Authority Housing Delivery Action Plans in the context of age-friendly housing provision and mandate provision of age-friendly and universal design homes for older people in line with population projections
- Publish all Local Authority Housing Delivery Action Plans
- Streamline supports provided across Local Authorities, such as right-sizing incentives

³⁷ <https://alone.ie/wp-content/uploads/2018/07/Housing-Choices-for-Older-People-in-Ireland-Time-for-Action-1.pdf>, p.31.

³⁸ <https://www.esri.ie/system/files/publications/RS143.pdf>

Increase funding to Housing Adaptation Grants for Older People

Of older people who are owner-occupiers or who live in their own home, often this home is not suitable to their needs. This may be due to not having a wheelchair accessible bathroom, suitable hand railings or aids for going up and downstairs, and other accessibility difficulties, but also due to the standard of the home itself. ALONE have worked with older people for example who do not have an indoor toilet, who may be sleeping on the floor due to the lack of a bed, or do not have proper cooking facilities.

According to a survey report published in June 2018 under the Healthy and Positive Ageing Initiative (HaPAI), a survey of people aged 55 and over (Gibney, et al., 2018), a quarter reported having difficulties associated with housing maintenance. A further 10% reported having ‘housing condition’ problems, which included rot in windows, doors or floors, and damp or leaks in walls. Over one-fifth (20%) reported having housing facility problems, which included shortage of space, home too big for current needs, lack of indoor flushing toilet, lack of a bath or shower, lack of downstairs toilet/bathroom facilities, and lack of place to sit outside.

A significant proportion of older people live in older buildings, resulting in increased amounts of maintenance required but which often goes undone due to lack of funds. More generally, older people are more likely to live in homes with low energy ratings, leading to increased heating and energy costs, which is further impacted by increased fuel prices. About 57% of people aged 75 and over live in BER EFG rated properties.³⁹

Housing Adaptation Grants is the collective term given to the three grants; Housing Aid for Older People, Housing Aid for People with a Disability and Mobility Aid Grant. These grants are provided to eligible people to modify their own homes, allowing them to live at home, within their communities, for longer. Given the large proportion of older people and people living with a disability who own their own homes, the Housing Adaptation Grants are especially important. It should be noted that these grants benefit the Government through costs avoided in the health sector, by way of the adaptation works facilitating the discharge of older people and people with disabilities from hospital.

ALONE have welcomed increases to the Housing Adaptation Grant in 2022, with an increase to €81.23 million. However, ALONE estimates that the Housing Aid for Older People grant alone requires funding of €84.5 million on an annual basis to meet demand. The scale of the issue shows there is much more to be done.

Action 4.1 of the Joint Policy Statement, ‘Housing Options for our Ageing Population’ states: ‘Increase the funding of the Housing Adaptation Grant Scheme, review the guidelines of the scheme, and streamline the application process and management of the scheme across all Local Authorities.’⁴⁰ While we recognise that a process is being undertaken to review the guidelines of the scheme (which ALONE will be submitting to), we would urge that a Budget commitment is made to increase the funding to this scheme on a multi-annual basis.

Recommendations:

- Commit to multi-annual increases to the Housing Adaptation Grant schemes
- Increase funding to the Housing Aid for Older People Scheme to €84.5 million annually, in line with need and demand

³⁹ ESRI, Working Paper 249: Estimating Building Energy Ratings for the Residential Building Stock: Location and Occupancy (August 2014). [online] Available at <https://www.esri.ie/system/files?file=media/file-uploads/2016-12/WP489.pdf>

⁴⁰ <https://www.gov.ie/en/publication/ea33c1-housing-options-for-our-ageing-population-policy-statement/>

Deliver choice in housing and Housing with Supports

Age-friendly housing and universal design are key steps in supporting older people to age well at home. In order to meet the additional needs of the population as we age, we must also ensure that ongoing supports, such as home care and step-down facilities are available where needed.

Older people, particularly those with health difficulties, require a range of choices in housing so that their health needs can be met cost-effectively and in a manner which is suitable and appropriate for them. ALONE is calling for investment in Housing with Supports as an alternative to nursing homes. Our research, which takes into account population projections to 2031 and take-up of this option elsewhere, indicates that 4,341 housing units with support will be needed.

Housing with supports refers to housing that is purpose designed with embedded on-site 24/7 support. Such housing typically includes self-contained accommodation with its own front door, an ethos of supporting independence, flexible care packages, access to activities and social events and various communal facilities. It is further characterised by a number of design features such as universal design, lifetime adaptable principles, and assisted technology incorporated into the scheme design. This type of housing is based on the premise that some people with high support needs can live independently or semi-independently with more intensive social and health care supports, including personal care and some nursing care. UK research demonstrates that, for some older people, a move to high support sheltered housing is associated with a better quality of life when compared with living in mainstream housing. Housing with supports clearly offers a dignified response to many people who can no longer live in their own homes but who do not require nursing home care.

Research by The Housing Agency shows that there is a strong financial benefit of such models of Supported Housing, which can replace more expensive nursing home beds or delays the need for the older person to access nursing home care, and also due to reduced health and social care needs⁴¹. The research by the Housing Agency shows that the State could save €900 million over 30 years as a result of direct public investment in Supported Housing for older people. Housing development, taking in consideration the demands from the ageing population, is in essence a long-term investment.

ALONE is pioneering this new model for Ireland and are part of a successful partnership with Circle VHA to design, build and deliver the first Housing with Supports scheme in Ireland, under the Government's Demonstrator Project where ALONE will be providing the 24/7 onsite supports. However, given the pressing population needs, we believe that the Department needs to start now in developing a funding a mechanism for further delivery of this model of housing..

Currently there is a severe lack of this type of housing available in Ireland. Given the current and projected levels of demand for housing for older people, a funding mechanism needs to be delivered as soon as possible to enable AHBs and other organisations to plan for and deliver Housing with Supports.

Recommendations:

- Develop and deliver a funding mechanism for AHBs and other agencies to deliver Housing with Supports

⁴¹ The Housing Agency, 2020. *Thinking Ahead: The Financial Benefits of Investing In Supported Housing For Older People*. Dublin: The Housing Agency, p.5.

Deliver targeted interventions to prevent homelessness amongst older people

It is widely recognised that housing is a social determinant of health that impacts a person's opportunity to live a healthy life^{42, 43}. Since the Government's previous plan to address homelessness, Rebuilding Ireland, was launched in July 2016, the number of over people aged 65+ accessing emergency homelessness accommodation in Ireland has increased by 58% - from 88 older people in July 2016, to 139 people in April 2022. This figure has been higher than 139 at various points during this period.

ALONE often works with older people among the 'hidden homeless'. This cohort may not be registered as accessing emergency accommodation but who may be homeless in all but name - for instance, sleeping on friends' couches, living in unsustainable family situations, etc. We also work with older people experiencing or on the brink of homelessness. For example, we have recently supported an older man who was just one week away from homelessness after receiving a notice to quit.

ALONE believe that Budget 2023 should provide targeted interventions to prevent homelessness amongst older people, and age-friendly homeless accommodation should also be provided which takes account of increased frailty and additional needs that older people experiencing homelessness may have. As well as this, the infrastructure of the necessary support coordination that will be required to support older people who are homeless also requires investment and development.

Recommendations:

- Develop, deliver and fund targeted interventions to prevent homelessness amongst older people
- Ensure homeless accommodation and supports provided take account of increased frailty and additional needs experienced by older people

⁴² Krieger, J. and Higgins, D., 2002. Housing and Health: Time Again for Public Health Action. *American Journal of Public Health*, 92(5), pp.758-768.

⁴³ Dunn JR, Hayes MV, Hulchanski JD, Hwang SW, Potvin L. Housing as a socio-economic determinant of health: findings of a national needs, gaps and opportunities assessment. *Can J Public Health* (2006)

Focus on interventions that have real potential to deliver results

There has been a recent focus on vacant homes due to nursing home occupancy, with references made to providing incentivisation for older people entering nursing homes to rent out their property.

Housing for All contains the following action under Pathway 4:

“Amend the Nursing Home Support Scheme Act 2009 to remove disincentives against the rental of vacant properties by participants in the Fair Deal scheme in a way that is targeted, equitable, evidence-based and provides appropriate safeguards for vulnerable older people.”⁴⁴

ALONE do not believe that this action is a viable solution. It is our belief that continued discussion of this topic at a time of housing crisis reflects ageism at its worst. Continued focus on solutions like this implies an element of blame on older people while distracting from the real issue at hand.

Revenue’s Preliminary Vacancy Analysis, dated 20 June 2022, shows that in total, 57,206 (3.2%) properties were indicated by their owners as being vacant on 1 November 2021⁴⁵. Nationally, the most frequent reason given for vacancy was that the property was “Undergoing Refurbishment” (22.4%), “Other” (21.7%) and “Holiday Home” (20.4%).

There are 553 property owners who own 10 or more properties with at least one property reported as vacant. Of these, 108 owners own 10 or more vacant properties.

The report shows that of houses vacant, the resident entering long-term care was the reason for 6.3% of them. This is equivalent to 3,603 homes vacant.

It also shows that 10.5% of homes vacant for more than 12 months or more were due to the resident entering long-term care. This is equivalent to 2,326 homes vacant for more than 12 months, because the owner is in long term care. This means that more than one third of homes vacant because the owner is in long term care have been vacant for less than a year.

A significant proportion of older people living in nursing homes have a form of dementia. The average stay in a nursing home according to the Department of Health is 2.93 years. This figure alone should point to the fact that the energy and resources used to free up these homes will prove at best unfruitful and at worse a waste.

According to the Department of Health, the average length of stay in Irish nursing homes is **2.93 years**⁴⁶ for all older people receiving this type of care. For those aged 85 years and older, and/or are experiencing poor health such as dementia, the duration of their residence is expected to be shorter.

It can be assumed that for many older people entering long-term care, renting their home is not going to be their primary concern, nor should it be. This being the case, where there was an interest in renting out the home, the average duration of a tenancy created on foot of an older person in residential care would be less than 2.5 years. This allows for time for the older person adjust to long

⁴⁴ Department of Housing, Local Government and Heritage, 2021. *Housing for All: A New Housing Plan for Ireland*. [online] Department of Housing, Local Government and Heritage, p.108. Available at: <<https://www.gov.ie/en/publication/ef5ec-housing-for-all-a-new-housing-plan-for-ireland/>>

⁴⁵ <https://www.gov.ie/en/press-release/f7289-minister-donohoe-welcomes-publication-of-revenue-data-on-vacant-property/>

⁴⁶ Department of Health, A Review of NHSS, A Fair Deal, 2015

term care, time to put the home on the market, obtain a suitable tenancy and ensure the statutory requirements of notice to quit in accordance with the Residential Tenancies Act were adhered to.

ALONE would expect that interest in partaking in a scheme involving the rental of their home would be low among nursing home residents for several reasons. This could be due to any resulting income not being a priority upon entering nursing home care; the stress of clearing and moving all belongings from the property; a hope that the person might some day get back home; or simply emotional attachment to a property that many may have spent a large proportion of their adult lives in.

Clearing out and renting a person's home while they are in a nursing home is an emotive and stressful solution that will yield a miniscule return compared to the targeted development of the right types of housing. Focus should remain on viable solutions.

Due to the small number of vacant properties available, the expected low uptake among the owners of this small number of properties, and the average life expectancy of the homeowner upon entering nursing home care, ALONE does not believe that progressing a policy of renting vacant properties from owners in residential care is viable, either from the perspective of the State or the individual concerned.

Other reasons that this scheme may not be viable include:

- The administrative burden on the older person
- Lack of financial incentive for the older person
- The administrative burden on the Department/ Local Authority involved in administering the scheme
- Conditions of the home and the potential need for decluttering, renovations, or other updates to make the home suitable for the rental market
- Location of homes being unpredictable and not consistently in rent pressure zones or other areas of high housing need
- Lack of security of tenure for the potential tenant
- Considerations of agency, safe-guarding, and capacity