

Everyone has a right to a place
they can call home.



Dear Miss Donnery,

Focus Ireland welcomes the opportunity to comment on the Review of the Code of Conduct on Mortgage Arrears.

As a housing and homeless charity our organisation works to prevent people becoming, remaining or returning to homelessness through the provision of quality services, supported housing, research and advocacy. We work with single adults, families and young people believing everyone has a right to a place they can call home.

Focus Ireland recognises that the present scale and prevalence of mortgage areas raises a number of important issues. However from our perspective the overriding concern of public policy should be that no person should become homeless as a result of falling into Mortgage Arrears.

In 2008 the government published a strategy to tackle homelessness called *The Way Home*. This strategy has three pillars prevention, housing and support. It is our view that the new Code of Conduct must reflect the fact that policies which allow repossession of the family home is not consistent with this approach.

Mortgage arrears must be addressed but mortgage repossessions which may cause someone to become homeless do not benefit the borrower, the lending institution or the wider community. Therefore a system of early intervention is vital for vulnerable households at risk losing their home.

Focus Ireland primary concern is in relation to what might be known colloquially as the "family home". This dwelling is referred to as the 'sole place of residence' in relation to entitlement to the Mortgage Interest Supplement under the Supplementary Welfare Allowance scheme.

We believe that two practical consequences arise from making prevention of homelessness the over riding objective:

First, that proceedings relating to the 'family home' should involve additional protections for the family in arrears, specifically that no eviction notice should be issued until the courts are satisfied that alternative housing arrangements have been made.

Second, that where repossessions proceedings are commenced in relation to premises that are rented out as accommodation, that the tenants in that accommodation should be notified of the commencement of those proceedings.

Yours Sincerely,

Mike Allen
Director of Research, Advocacy and Development

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Focus Ireland, Head Office
9-12 High Street
Christchurch
Dublin 8
Tel 01 881 5900
Fax 01 881 5950
Email info@focusireland.ie
www.focusireland.ie