

Jan O'Sullivan TD  
Minister of State, Department of Environment,  
Community and Local Government  
with special responsibility for Housing and Planning

19 December 2013

Dear Minister O'Sullivan,

As members of the Homelessness Oversight Group, we are pleased to submit our first report to you. The report is based on extensive consultation with major relevant actors, a reading of background documentation and historical data, and a review of three quarters of official current data on homelessness, to the period ending 30 September 2013.

We have been received openly and with a spirit of cooperation by everyone we have met in our work. We wish to recognise the goodwill, ingenuity and hard work of so many in the homelessness sector and the great support they provide to an extremely vulnerable group in Irish society.

We believe that the goals of ending long term homelessness and the need to sleep rough can be achieved by 2016, as set out in your policy statement in February 2013. We consider however that progress towards those goals has been limited so far. Our report focuses on the major challenges that need to be overcome to speed up progress. We have not sought to deal with all issues facing the sector – many of these we expect to return to in later reports. Our concern rather has been to identify the major blockages that hamper progress towards the key goals and to recommend how those blockages might be overcome.

As Minister you have demonstrated a commitment to bettering the lives of those in Ireland who suffer the depredations of homelessness. We hope that our observations will be helpful in achieving that outcome.

Yours sincerely,

**Mark Kennedy**

**Sylda Langford**

**Tony Fahey**

# HOMELESSNESS OVERSIGHT GROUP

First Report

19 December 2013



## Contents

Acknowledgements .....	3
Executive Summary .....	4
1 Background and context .....	7
1.1 Introduction .....	7
1.2 Homelessness: Policies and trends .....	7
1.2.1 Early developments .....	7
1.2.2 The housing-led approach .....	8
1.2.3 Trends in homelessness .....	9
1.3 Obstacles to progress .....	10
1.4 Are the 2016 objectives attainable? .....	11
1.5 Policy measures - prevention and housing .....	12
1.6 The need for flexibility .....	12
2 Achieving the 2016 goals .....	14
2.1 Direction of the sector (including responsibility for addressing supply of accommodation) .....	14
2.2 Supply of appropriate accommodation .....	15
2.3 Funding the sector .....	18
2.3.1 Direct and indirect State funding .....	18
2.3.2 Other sources of funding .....	19
2.4 Data .....	20
3 Additional measures .....	23

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## EXECUTIVE SUMMARY

While there are many complexities to the problem of homelessness, the core of the necessary response is straightforward to conceive though in present circumstances difficult to execute, namely, *to provide permanent housing for the homeless*. The early aim of policy on homelessness (in Ireland and internationally) was to provide temporary shelter as a stepping stone to permanent housing. This approach is now recognised as ineffective and has been replaced by a 'housing-led' approach which accords priority to settling the homeless in permanent housing as a first step, with relevant social supports where necessary but seeking to avoid an extended transition stage in temporary accommodation. Since the adoption of *The Way Home* strategy for adult homelessness in 2008, this priority has been more-or-less universally accepted in the homeless sector in Ireland but progress towards fulfilling it has been slow. A major reason is that agencies that deliver services to the homeless have had little role in providing long-term housing while providers of long-term housing have accorded low priority to housing the mainly single adults who comprise the majority of the homeless.

In other words, policy on housing for low-income households (which is delivered by agencies with a broad housing remit) has been insufficiently aligned with the goals of policy on homelessness (which is delivered by agencies with a specific focus on homelessness but with a limited role in housing). No actor with the authority to co-direct these arms of policy has yet successfully sought to align them fully with each other.

The resulting limited access to permanent housing for the homeless forces the homeless services to shelter many of the homeless in various types of temporary and emergency accommodation, sometimes for long periods, usually at high cost and often with results that either achieve little lasting improvement in the circumstances of the homeless or sometimes may cause them to worsen. In recent months, a dwindling supply of appropriate housing in the Dublin region (where the majority of homeless persons are located) has added to the challenges in this area, though limited access to permanent housing for the homeless long pre-dates recent changes in the housing market.

Some of the homeless require various forms of health and social service supports (particularly in regard to mental ill-health, addiction, and personal and family problems). These services have developed greatly since the early 2000s and are effective to a degree. But they are difficult to coordinate and deliver to maximum effect, particularly for those homeless who live for long periods in the un-homelike circumstances of temporary accommodation, an experience that even the healthiest of people would find difficult to endure. As the long-term homeless are moved into permanent housing between now and 2016, in line with the 2016 objectives, services will need to follow them and provide necessary supports in new ways and in new contexts. This will require serious coordinated effort by the actors involved.

Against this background, we believe that the goal of ending long term homelessness and the need to sleep rough by 2016 can be achieved if:

- a. policy on social housing in a broad sense (i.e. including provision of rent supports for tenants in the private rented sector) fully accepts the 2016 objectives and goes further to meet them than it does at present;
- b. support services for the homeless succeed in re-orienting their work towards settling, supporting and sustaining the homeless in permanent housing in place of the current focus on shelter-based services;

- c. housing providers and social support services do more to prevent homelessness among vulnerable persons who are exiting institutional settings (especially prisons and care institutions) or who are at risk of eviction from current housing.

In order to achieve these outcomes, our core recommendation is that a high-level team supported by an implementation unit be set up and charged with achieving the 2016 objectives. That group should bring together the major state agencies that deal with homelessness, housing and related services, including in particular the homelessness and housing divisions in the DECLG and key local authorities, the Social Care Services in the Health Services Executive, and the rent supplement section in the Department of Social Protection (as delivered through Community Welfare Officers). It should be comprised of officials who have the authority needed to command and coordinate the actions from the agencies involved as needed to achieve the 2016 objectives. It should report in the first instance to the Minister for Housing and Planning and through her to the Cabinet Committee on Social Policy.

We also recommend that, during the period of transition to the fulfilment of the 2016 objectives (that is, for 2014, 2015 and 2016) current funding to the sector from all sources – Department of the Environment, Community and Local Government (DECLG), HSE, Department of Social Protection and Local Authorities – be maintained at 2013 levels. In spite of recent upward pressures in homelessness caused by the financial crisis and developments in the housing market, we believe that the 2016 objectives can be achieved within the existing envelope of available resources, though that will require a much more efficient and complete use of those resources (including in particular a more complete draw-down and utilisation of currently under-utilised capital funding available through the Housing Finance Agency).

Our main recommendations, dealing with these and related issues, are as follows:

1. A single unit (the "Homelessness Policy Implementation Team", hereinafter 'the Team') should be set up with responsibility for achieving the 2016 objectives for the homeless by co-ordinating and commissioning the sourcing and delivery of permanent housing and necessary support services for the homeless and by providing composite Service Level Agreements to relevant delivery organisations. This Team should be led by the DECLG and comprise senior officials from the DECLG/Local Authorities, Health Services Executive and Department of Social Protection. The Team should be supported by operational personnel in the relevant organisations seconded for this purpose to a central unit.
2. The Team should report in the first instance to the Minister for Housing and Planning and through her to the Cabinet Committee on Social Policy.
3. The Team should prepare and publish a structured plan to make the transition from a shelter-led to a sustainable housing-led response to homelessness and to achieve the 2016 goals for homelessness. This plan should set adequate and measurable interim goals for the acquisition, leasing, transformation and refurbishment of suitable properties, for securing suitable tenancies in the private rented sector, for the closure of existing shelter-style accommodation once alternate provision of permanent housing is made, and for the management of funding requirements accordingly. It should also include measures to optimise the delivery of support services in a co-ordinated fashion and to re-orient services to the settlement and support of the homeless in permanent housing. An essential part of such a plan will be to manage the closure of temporary emergency units in a timely fashion, so that continued short-term access to such accommodation will be available for those who need it and thereby to ensure that the need to sleep rough will be eliminated.

4. The Team should also ensure that, with the support of the Minister for Housing, a supply of permanent accommodation is ring-fenced for the homeless. Despite current constraints on the supply of low-income housing (particularly for single persons) and on Government spending, we believe that conditions for creating an adequate ring-fenced supply can be achieved by:
  - a. Updating the Social Housing Leasing Scheme to make it more effective (see p. 18);
  - b. Bringing social housing voids back into use (see p. 18);
  - c. Mandating the Housing Finance Agency (HFA) to create lending products to support provision of housing for the homeless. We also request that the HFA would work with prospective borrowers, without lowering credit standards, to assist them in achieving eligible status thus increasing the chances that the resources available are drawn down by the sector (see p. 18);
  - d. Requesting Local Authorities and AHBs to provide a statement of dedicated allocations of housing to the homeless sector indicating how many units will be available in each of 2014, 2015 and 2016 (see p. 18);
  - e. Requesting that NAMA identify appropriate single or small groups of properties that are currently vacant or will become vacant in the period to 2016, which could be put to use in addressing the challenge of homelessness. We would also suggest that any properties made available by NAMA be ring-fenced for the use of the homelessness sector (see p. 19);
  - f. Replacing the multiple accommodation-search activities that exist at present among homeless agencies with a single integrated Social Housing Rental Service in major urban centres (see p. 19);

We also suggest:

- g. The Data Workshop Group convened by the CDT/NHCC should continue its work and agree by the end of January 2014 the definitions and characteristics of the monitoring indicators identified in the Minister's policy statement. This should include reporting timelines, who should get data and who is responsible for responding to indicators (see p. 22);
- h. That the implementation of PASS be continued in a structured and timely fashion, with a focus on useful indicators of outcomes (see p. 22);
- i. We recommend that the indicator for "Number of persons in emergency accommodation for longer than 6 months" should be amended to represent the episodic nature of long term homelessness – that is, to capture persons leaving and returning to the system. The definition might, for example, refer to "persons consecutively in emergency accommodation for longer than 6 months OR for more than 6 months (non-consecutive) in the previous twelve months."; and
- j. We recommend that in the longer term consideration be given by the Homelessness Policy Implementation Unit to developing a comprehensive model to express the full cost of provision of accommodation and services to homeless persons to support the assessment of value for money.

In addition to these recommendations, we have made recommendations dealing with particular service related matters in part 3 of this report.

# 1 BACKGROUND AND CONTEXT

*“Homelessness is an affront to every value that we assign to the concept of citizenship. In a real republic there is an onus on us all to ensure that all citizens have a place they can call home.”*

Minister Jan O’Sullivan, 21 February 2013

## 1.1 INTRODUCTION

The Homelessness Oversight Group was formed by Minister for Housing, Jan O’Sullivan TD in February 2013. The purpose of the Group is to observe progress towards the objectives set out by the Minister in her policy statement of February 2013 and to provide the Minister with an independent view on where and how progress is or is not being achieved. The objectives in question, to be achieved by 2016, are:

1. Preventing homelessness
2. Eliminating the need to sleep rough
3. Eliminating long-term occupation of emergency accommodation
4. Providing long-term housing solutions
5. Ensuring effective services
6. Better co-ordinated funding arrangements

We have offered our service to the Minister for the period to 2016. We are committed to supporting the Minister and all participating in the provision of services and accommodation to the homeless in achieving the homelessness policy objectives.

## 1.2 HOMELESSNESS: POLICIES AND TRENDS

### 1.2.1 Early developments

Irish public policy on homelessness had been limited and fragmented until an integrated strategy to deal with homelessness was adopted in 2000 (*Homelessness – An Integrated Strategy 2000*) and was followed in 2002 by a strategy to prevent homelessness (*Homelessness – A Strategy for Prevention 2002*). Between 2000 and 2008, expenditure on homelessness (taking both public expenditure and voluntary fund-raising into account) increased approximately ten-fold, rising from c. €10 million to c. €100 million per year. Expenditure has reduced somewhat since 2008, reflecting the impact of the fiscal crisis. As policy developed since the early 2000s, much was achieved in providing shelter and associated support services for the homeless. The incidence of rough sleeping declined from over 300 per night in the early 2000s to between 50 and 100 per night until this year but seem to be rising again in recent months (see below). The range and quality of care services has advanced well beyond the very limited provision previously available.<sup>1</sup>

The initial thrust of policy in the early 2000s was to provide shelter and support services for homeless people, with a view to eventually facilitating their re-entry into normal housing. This was later labelled the ‘treatment first’ or ‘shelter and services’ approach. However, since the mid-2000s, general agreement has emerged that a ‘shelter and services’ model of response

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<sup>1</sup> For an account of these developments and of trends in homelessness and the measurement methods underpinning the available data, see E. O’Sullivan (2012) ‘Ending Homelessness: A Housing-Led Approach’, Report for the Department of the Environment, Community and Local Government, pp. 16-18 (available at <http://www.homelessdublin.ie/publications?page=5>).



to homelessness is inadequate. While the model works as intended for substantial numbers of short-term homeless for whom the stay in homeless services is short and is followed by re-integration into standard housing, there are also many homeless who become entrenched in shelter accommodation for a long time or have repeated episodes of homelessness. A detailed analysis carried out in 2008 found that of the 2,366 adults counted as homeless in the Dublin region in a particular week in that year, 84% had been in homeless services for six months or more and nearly a third (31%) had been in homeless services for at least five years.<sup>2</sup>

The weakness identified in the 'shelter and services' model of homeless services, therefore, is that there are many homeless for whom it fails to achieve reintegration into permanent housing and, by virtue of the un-homelike conditions of shelter accommodation, often causes the personal difficulties of those involved to worsen, despite the often quite costly care and support services they receive. In addition, the model is expensive to implement, particularly in regard to accommodation. While it is often difficult to separate out the accommodation component of the 'shelter and services' model from its care and services component, a number of estimates have found that pure shelter costs per bed-space in temporary or emergency accommodation are well in excess of what a standard single-person apartment would cost in the private rented sector.<sup>3</sup> Since shelter-type accommodation is less good for residents than standard permanent housing, the cost-benefit argument in favour of standard housing over shelter accommodation for anything other than short emergency stays is strong.

## 1.2.2 The housing-led approach

In response to the recognised limitations of the shelter and services model of provision for the homeless, policy shifted in the mid-2000s towards an alternative 'housing led' approach which holds that for the majority of homeless (that is, apart from a certain category of high-need homeless who may require long-term supported accommodation), the first objective should be to provide permanent, standard housing and thus minimise the use of temporary accommodation. In addition, support and care services should be re-directed to settling and sustaining the homeless in such housing and on that basis provide a better context for dealing with whatever additional health or personal problems they may face. The appeal of this new approach lay in the first instance in the better outcomes for the homeless which it seems capable of delivering, but also in the more efficient use of public funding which a reduced reliance on expensive temporary shelter would bring.

A new national strategy on homelessness adopted in 2008, *The Way Home*,<sup>4</sup> embodied the shift in policy towards the housing-led approach. It adopted the six goals of policy on homelessness that remain as the framework for policy today and were re-iterated in the policy statement on homelessness of February 2013 referred in section 1.1 above. A key target set out in *The Way Home* in 2008 was that long-term homelessness and the need to

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<sup>2</sup> *Counted in, 2008*, Dublin: Homeless Agency, p. 30. For similar results based on interviews with a sample of residents in private emergency accommodation in 2008, see *Evaluation of Homeless Services – 2008 Series*, Dublin: Homeless Agency, p. 60. Available at <http://www.homelessdublin.ie/publications?page=5>

<sup>3</sup> An estimate made in 2008 calculated that where it cost the exchequer over €13,600 per year to provide private emergency accommodation for a single homeless person (a form of provision consisting almost wholly of accommodation, without any social service supports), the same person could be accommodated in normal long-term private rented accommodation at an exchequer cost of €9,500 per year, representing a potential saving of over €4,100 per year if the long-term housing solution were provided (*Evaluation of Homeless Services 2008*, pp. 77-78).

<sup>4</sup> *The Way Home: A Strategy to Address Adult Homelessness in Ireland, 2008-13*, Dublin: Department of the Environment, Heritage and Local Government.

sleep rough would be eliminated by 2010.<sup>5</sup> As we shall see further below, that target was not met. The new date of 2016 set for achieving this target in the policy statement of February 2013 is thus a follow-on to that earlier effort. In 2009, the Homeless Agency proposed a detailed plan (*Pathways to Home*) to eliminate long-term homelessness and the need to sleep rough in the Dublin region by the end of 2010. It estimated that 2144 long-term rental housing units were needed to achieve that target, though it also estimated that the number of long-term homeless who comprised the core need group were considerably less than that at 1,651 (*Pathways to Home*, p. 59). The Agency declared itself confident that 1,000 of the necessary units could be delivered in 2009 and identified a range of means by which these units could be provided (*Pathways to Home*, pp. 66-67). It estimated that about a fifth of households that were settled in such housing would need long-term assistance to live independently, a little over half would need short-term assistance, and the balance of almost a quarter would need no special assistance. Another category of homeless consisted of those not capable of independent living, who would need special long-term supported housing. These amounted to about one in five of all homeless (*Pathways to Home*, pp. 62-63).

### 1.2.3 Trends in homelessness

The methods of measuring homelessness applied in 2008 and the years before then have not been repeated since so it is not possible to track precisely what progress has been made in reducing either overall homelessness or long-term homelessness in recent years (see section 2.4 below on the current system of measurement, which is based on data from the Pathway and Accommodation Support System – PASS). However, the indications are that progress has been slow, though advances in outcomes may have occurred on certain fronts for certain periods. A special count of the homeless conducted for Census 2011 found 3,808 homeless persons in the country as a whole on census night, 10 April 2011, of which 2,375 were in the Dublin region.<sup>6</sup> The latter number compares to the Counted In estimate for the Dublin region of 2,336 in 2008, which, even allowing for differences in methodology, would suggest that little change had occurred in the overall incidence of homelessness in the Dublin region over the three years between 2008 and 2011. As the Census count in 2011 did not measure duration of homelessness, that source provides no information on long-term homelessness. It is therefore unclear whether any reduction in long-term homelessness had occurred between 2008 and 2011, though the widespread view in the sector is that the long-term share in the overall total of homelessness is unlikely to have differed to that found in 2008. It therefore seems likely that no significant reduction in long-term homelessness had occurred between 2008 and 2011.

The number of rough sleepers identified in the Census count in Dublin in April 2011, however, was 58, which indicates some improvement when set against the 110 rough sleepers identified in the *Counted In* estimate for spring 2008. Recent indications are that rough sleeping has risen again: the rough sleeper count for Dublin in spring 2013 shows 94 rough sleepers, a substantial rise on the 58 counted in April 2011. A count of rough sleepers for November 2013 shows further increases to 139. On this indicator, therefore, rough sleepers are on an upward trend and this trend will need to be reversed if the 2016 objective of eliminating the need to sleep rough is to be met.

The picture on the trend in overall homelessness since 2011 relies on PASS data, a measurement system which has been developing over that period and is not yet implemented fully (see below section 2.4). Most notably, it does not yet provide a count of long-term homelessness and it is therefore unclear whether the target of eliminating long-term homelessness is closer to being achieved now than in 2011 or 2008. Since the PASS

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<sup>5</sup> *The Way Home*, p. 7.

<sup>6</sup> Central Statistics Office *Homeless Persons in Ireland: A Special Census Report*. (September 2012)

system was rolled out first in Dublin, the trend data it provides are most extensive for the Dublin region. These data report that in the Dublin region in Q3 2013, 1,431 persons were accommodated in emergency accommodation on the night of 30 September 2013, which compares with a very similar number – 1493 – on the same night a year previously.<sup>7</sup> Taking the first nine months of 2013, the PASS count of total individual users who passed through emergency accommodation in the Dublin region was 4,012, which is somewhat higher than the total of 3,919 for the corresponding period in 2011. On these indications, therefore, little change in the incidence of homelessness seems to have occurred in Dublin in recent years.

It is notable that the 1,431 homeless who were in emergency accommodation in Dublin in September 2013 (as just noted from PASS data) was lower than the 1,651 persons who were estimated to be *long-term* homeless in Dublin in the *Counted In* estimate of 2008. Different bases or methodologies adopted may mean that these totals are not comparable, yet on face value they suggest that some reduction in long-term homelessness may have occurred since 2008. It is possible therefore that despite overall lack of improvement in the picture of homelessness in Dublin, some reduction may have occurred in *long-term* homelessness. However, even if any such reduction has occurred, it would seem to be too little and at too slow a pace for the current rate of progress to be enough to achieve the elimination of long-term homelessness by target date of 2016 set out in the homeless policy statement of February 2013.

### 1.3 OBSTACLES TO PROGRESS

In seeking to identify the obstacles to securing permanent housing which is the essential ingredient in ending long-term homelessness, we point to the lack of integration between key domains of provision as a central problem. This lack arises in the first instance between the services component of the response to homelessness (which, in relative terms, is quite highly developed) and the permanent housing component, which is tied in to policy and provision for the homeless only in a limited way. The problem here is that housing providers have housing responsibilities which go well beyond the homeless and embrace a wide range of low income households. The main such housing providers are the housing departments in the local authorities, the approved housing bodies which, as NGOs, deliver most of the new social housing on behalf of local authorities, and the Department of Social Protection (which through its Community Welfare Officers provides rent supplements for welfare-dependent tenants in the private rented sector). The broad housing concerns of these providers typically have the result that their priority targets (such as families with children and elderly households) do not include the single adult males who make up the majority of the long-term homeless. Homeless agencies, by contrast, are more narrowly focused on provision of shelter, social supports and related health services to the homeless but also require access to long-term housing in order to meet what is *the* core need of their clientele – the need for a permanent home. For the latter purpose, they depend on housing providers since they themselves have little role in housing but they struggle to make successful claims for access in the light of the low priority accorded to their clientele in the wider system of housing allocations.

It is in these terms that we interpret the difficulties in achieving the goal of ending long-term homelessness by 2010 which was set out by *The Way Home* strategy on homelessness in 2008. An implementation plan to achieve that goal was devised by the Homeless Agency<sup>8</sup> for the Dublin region. That plan identified a number of different sources from which the

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<sup>7</sup> The data quoted here are from the Dublin Region Homeless Executive Performance Report 2013 relating to the Protocol Governing Delegation of Section 10 Funding for Homeless Services in the Dublin Region (November 2013)

<sup>8</sup> The Homeless Agency was the precursor to the current Dublin Region Homeless Executive.

necessary number of long-term housing units could be drawn within the 2009-10 period.<sup>9</sup> These sources included:

- a. Standard social housing (from both local authorities and voluntary housing bodies), of which the Homeless Agency expected that a substantial proportion of normal lettings would be made available for homeless households;
- b. Existing temporary and transitional housing units, of which a substantial proportion could be converted into long-term housing occupied under normal leases by formerly homeless households;
- c. A special variant of the Rental Accommodation Schemes which would be designed especially for homeless people; and
- d. Closer engagement with Community Welfare Officers to support access to private rented housing for homeless households under the Rent Supplement scheme.

Of these sources, only (b) was directly under the remit of the Homeless Agency or the wider system of homeless services while the other elements – (a), (c) and (d) above – related to agencies outside the homeless services.

## 1.4 ARE THE 2016 OBJECTIVES ATTAINABLE?

Despite slow progress to date in reducing long-term homelessness and ending the need to sleep rough and despite current unfavourable circumstances in government finances, there are four grounds on which we believe that these objectives can be attained by 2016, in accordance with the target set by the homeless policy statement of February 2013. These grounds are:

1. *The scale of the problem to be tackled is limited.* The lack of up-to-date data make it impossible to make precise estimates of the number of permanent housing units needed to achieve the 2016 targets, but the total is likely to be in the region of 1,500 to 2,000 units, to be delivered over the next three years. While this is a substantial total, it has to be seen in the context of the total volume of state-supported housing in Ireland, which consists in nearly quarter of a million units – some 150,000 units rented by local authorities or approved housing bodies and almost 90,000 units of private rented accommodation for which rent subsidies are paid by the Department of Social Protection. While this large sector is under pressure to accommodate large numbers of households of many different types, the added challenge of including the long-term homeless is not of an impossible scale.
2. *There are many under-used housing resources and related financial supports which could be brought to bear to help deal with long-term homelessness.* These include vacant housing ('voids') in the social housing system, private rented properties which could be mobilised through an improved social leasing scheme, properties that might be made available from NAMA, and capital funding from the Housing Finance Agency which at present is available but under-used in regard both for social housing generally and for housing for the homeless. These resources are dealt with further in the next section of this report.
3. *Funding currently devoted to expensive emergency accommodation, especially private emergency accommodation, will be released as the long-term homeless are transferred into permanent housing and the extent of shelter services that is required declines.* A Value for Money evaluation of the homeless services carried out in 2008 pointed out that while securing permanent housing for homeless people was one of the core objectives of policy on homelessness, only 8% of the budget for

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<sup>9</sup> Pathway to Home 2009, Chapter 9: Actions agreed in Response to the Homeless Agency Partnership Submission to Government

homelessness was dedicated to that objective, compared to 64% expended on emergency and transitional services. The evaluation pointed out this balance of spending *[did] not seem logical* and contributed to the outcome where 84% of homeless households were trapped in long-term homeless services. It recommended that allocation of spending between long-term housing and emergency & transitional services needed to be radically rebalanced towards the former if spending patterns were to be aligned with the core policy goal of ending long-term homelessness.<sup>10</sup> A recommendation along similar lines has been regularly repeated in numerous policy and implementation documents up to the present time but has not been implemented, although we note efforts made to implement in 2013. Estimates of expenditure out-turns for 2013 indicate that spending on 're-settlement, prevention and sustainment' will account for 8% of spending on homeless services by the DECLG and local authorities, while emergency accommodation will account for some 53%. Although precise comparisons with earlier spending patterns are difficult because of changes in how spending is categorised, this outturn indicates that the misalignment between expenditure breakdowns and policy goals highlighted in 2008 continues to the present and should be targeted as a key area for reform in the coming period.

4. As we have already noted we have been impressed by the determination of those working in the sector to achieve the 2016 goals. Much has been achieved by the sector in the past decade and this can be built upon over the next three years.

## 1.5 POLICY MEASURES - PREVENTION AND HOUSING

The long term sustainable management of homelessness is perhaps more than anything a matter of prevention. In addition to the immediate objective of addressing long term homelessness, it is necessary to develop preventative measures. This will require the concerted activation of a number of policies, encompassing education, health, social services, and employment measures as well as housing.

## 1.6 THE NEED FOR FLEXIBILITY

We have seen, in the course of our engagement many individuals and organisations working in the sector, that even in a period of increasing demand for services and accommodation and a simultaneous reduction in available funding, how the innovation, ingenuity and hard work of individuals and teams is key to achieving an enormous amount of success and progress for individual homeless persons. Those directly engaged in delivering services and support are often confronted by the severe and chaotic behaviour of individuals with very complex conditions and problems which are contributory factors to their inability to sustain accommodation unaided. There is also some evidence that during 2013 an increasing trend of families and individuals seeking aid having lost their accommodation due to economic circumstances has emerged.

In all of these circumstances an overly rigid system of provision can delay and even prevent the delivery of services, support and accommodation. While a systemic rigour must be maintained to ensure that resources are properly, equitably and appropriately deployed, an element of flexibility in the administration of available resource is desirable and will support those working directly with the homeless population in achieving the best possible results. We have made some suggestions in this regard in Part 3 of this report.

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<sup>10</sup> Review of Finances and Expenditure for Homeless Services 2008, pp. 19, 84

Finally, we stress that the provision of accommodation to the homeless sector is necessarily interwoven with the overall question of social housing availability. The transition from public provision social housing to one where the State and Local Authorities seek to make provision through a predominantly private sector market mechanism risks leaving those without a home in a particularly vulnerable position. We consider that significant progress on the policy objectives will require a separate prioritised, or ring-fenced, supply of accommodation in the short term.

## Findings

1. We believe that the goal of ending long term homelessness and the need to sleep rough by 2016 can be achieved if:
  - a. policy on social housing in a broad sense (i.e. including provision of rent supports for tenants in the private rented sector) accepts the 2016 objectives and does more to meet them than it does at present;
  - b. support services for the homeless succeed in re-orienting their work towards settling, supporting and sustaining the homeless in permanent housing in place of the current focus on shelter-based services; and
  - c. housing providers and social support services do more to prevent homelessness among vulnerable persons who are exiting institutional settings (especially prisons and care institutions) or who are at risk of eviction from current housing.
2. The period to 2016 is in our view an important transition period. It should be used to address the issue of long term homelessness which has seen a disproportionate element of available funding consumed by short term accommodation needs. In doing so we believe it will permit the system to focus more sustainably on themes of long term accommodation solutions, delivery of care, support and services, and preventative measures. As we have noted, we consider that during this period of transition a separate prioritised or ring-fenced provision of accommodation will be required to achieve the 2016 policy objectives.

Beyond those key actions significant progress can be made through specific issues and we have some recommendations in that regard in Part 3 of the report.

## **2 ACHIEVING THE 2016 GOALS**

### **2.1 DIRECTION OF THE SECTOR (INCLUDING RESPONSIBILITY FOR ADDRESSING SUPPLY OF ACCOMMODATION)**

The homelessness sector as currently arranged is a complex network of relationships, responsibilities and authorities and it is perhaps the positive attitude of the different constituent parties which accounts for much of its success. There is, in such a system, a risk of distortion of actions and unintended consequences. Currently homelessness straddles two social policy and implementation areas – care and housing – and responsibility and funding for these two areas lie in different parts of government and with different agencies. The care elements are more to the fore than the housing elements and at present government efforts to solve homeless problems are directed through a sector whose competences are strong in care and remedial services but not in housing.

Organisations with developed competencies in housing delivery are not a dedicated part of the homeless sector as currently configured. These competences include the capacity to structure, develop and manage property portfolios. There are almost 700 AHB's in existence, of which only 6 have been approved as eligible for capital lending from the Housing Finance Agency. While a number of non-government agencies aspire to act as providers of accommodation in the sector they are limited in their capacity to do so by factors such as the strength of their balance sheets, predictability and sustainability of income streams, and organisational and structural issues. In essence, they are not organised to be property agencies.

Those NGO's are, however, well organised to act as providers of social services to the sector. It might be more efficient and effective to use those organisations' with strong competences in social service care skills for prevention, transition, support and crisis intervention services and to free them from the cycle of each separately and concurrently chasing the same limited supply in the private sector for those who present as homeless to each agency.

The current structural responses need to be developed so that those with competence in the housing area are given responsibility for developing supply which those working with the homeless can then access with services as appropriate for their clients. We consider that it would be more appropriate to have the entity that drives policy on homelessness positioned in the general housing policy section of the Department of the Environment (though with linkages to all key agencies involved in the sector). This entity would use Service Level Agreements with competent Approved Housing Bodies capable of accessing capital funding from the Housing finance Agency to supply housing for the homeless and would have Service Level Agreements with those organisations in the social service care side to provide preventive, emergency transition, support and crisis intervention services. At present there is a mismatch between policy and implementation structures which need to be resolved successfully if targets are to be achieved.

Direction of the sector is dispersed throughout a network of complex relationships. We would consider it beneficial if a single body was charged with, and has authority to, deliver the key 2016 objectives. This would include acting as the single reference point and contracting party for SLA's, accounting for funding, and directions of policy implementation. It should draw up and implement a national plan for the reduction and elimination of long term homelessness between now and 2016 – a transition plan. This body should be responsible directly to the Minister.

For the transition period to 2016 there needs to be a single central team with both the authority and responsibility to achieve delivery of the policy goals, with its scope to include both the accommodation and services needs of the homeless. We propose that this group would comprise senior officials of the Department of the Environment, Community and Local Government, the HSE and the Department of Social Protection. The group should have sufficient resources and authority to execute its task.

Finally, we note that reporting against objectives is primarily on the basis of a target of numbers moved into accommodation in a year, and of sums spent. These are useful, but address only partially the objectives of the policy. Additional appropriate performance indicators would enhance the process and, we believe, provide for clearer linkage between efforts and goal achievement.

### **Recommendations:**

1. A single unit (the "Homelessness Policy Implementation Team", hereinafter 'the Team') should be set up with responsibility for achieving the 2016 objectives for the homeless by co-ordinating and commissioning the sourcing and delivery of permanent housing and necessary support services for the homeless and by providing composite Service Level Agreements to relevant delivery organisations. This Team should be led by the DECLG and comprise senior officials from the DECLG/Local Authorities, Health Services Executive and Department of Social Protection. The Team should be supported by operational personnel in the relevant organisations seconded for this purpose to a central unit.
2. The Team should report in the first instance to the Minister for Housing and Planning and through her to the Cabinet Committee on Social Policy.
3. The Team should prepare and publish a structured plan to make the transition from a shelter-led to a sustainable housing-led response to homelessness and to achieve the 2016 goals for homelessness. This plan should set adequate and measurable interim goals for the acquisition, leasing, transformation and refurbishment of suitable properties, for securing suitable tenancies in the private rented sector, for the closure of existing shelter-style accommodation once alternate provision of permanent housing is made, and for the management of funding requirements accordingly. It should also include measures to optimise the delivery of support services in a co-ordinated fashion and to re-orient services to the settlement and support of the homeless in permanent housing. An essential part of such a plan will be to manage the closure of temporary emergency units in a timely fashion, so that continued short-term access to such accommodation will be available for those who need it and thereby to ensure that the need to sleep rough will be eliminated.

## **2.2 SUPPLY OF APPROPRIATE ACCOMMODATION**

There is an acknowledged deficit in the supply of appropriate accommodation for the homeless population, particularly in the Dublin area. This is a significant impediment to the delivery of the 2016 objectives. This supply issue may be considered to comprise two issues:

- an availability of and access to appropriate accommodation; and
- a sustainable system by which finance can be sourced - whether by AHB's, NGO's or others - from private sources or borrowings, from the Housing Finance Agency, or with Government support through provision by the Department of Social Protection, by grant in aid of either a capital or revenue nature, and availability agreements.



There are two further aspects to consider in relation to the question of supply - time and responsibility. There is a need, currently formally unquantified but we would estimate it at between 1,500 and 2,000 units, which are needed to move a significant number of long term and habitually episodic homeless persons from emergency accommodation to more permanent accommodation. This is a need in the short or immediate term if the 2016 policy goals are to be achieved. There is also a need to secure a supply for the future. At present, responsibility for procuring supply of housing for the homeless seems to be dispersed amongst different bodies - the Department, individual local authorities, the DRHE, AHB's and certain NGO's each taking a role - but without a single point of responsibility and management. Our comments on the direction of the sector seek, in part, to address this latter issue.

The following issues are also worth noting.

1. It is generally accepted that the existing leasing/availability agreement scheme is not working optimally in all areas - notably Dublin. Many explanations are offered and much hope is expressed that the arrangements will provide a significant amount of supply of appropriate housing. The scheme, in our view, appears unlikely to do so for the following reasons:
  - a. The private tenancy market supply is dominated by small landlords, many of whom entered the market in the boom and are now in a financially distressed situation. They are less likely to want to engage with the management issues and challenges associated in fact with part of, and perceptively attached to all of, the homeless population. The combination of disposition of the landlord and financial pressures mean that they will not enter into schemes unless there is no other viable option - which in Dublin and in other larger urban centres is generally not the case. There is a potential change to the makeup of this sector if, as is likely, banks engage in significant asset repossession - in that the landlord will change and some of the economic backdrop (level of debt attaching to new landlord) will change. We cannot foresee the longer term consequences of such a change.
  - b. The rent offered (typically at 80% of market rate) is not sufficiently attractive to landlords in the current market situation.
  - c. The leasing scheme does not include a guarantee of income sufficient to entice large numbers of investors to enter into such an agreement for a lengthy period. While there is some debate about this in the sector, it appears that large or institutional investors are less willing to enter the market - and this has been the experience to date.
  - d. Many of the service providers in the sector, because of their focus and structure, are ill-equipped to engage in the large scale provision of housing. While some organisations may achieve this capacity over time, we consider that steps need to be taken in the interim to secure an appropriate supply of accommodation.

It seems to us that an effective leasing system is central to any attempt to increase short term supply and accordingly we are making a recommendation that the Minister would seek support from an expert group to address this in a short exercise.

2. Significant numbers of voids are available in certain local authority areas and some of the relevant local authorities have insufficient maintenance and refurbishment funding to return those properties to use in the short term. It seems important that a mechanism is found to permit these properties to be put at the disposal of the

homeless population and of the wider clientele for social housing. This is, again, a measure seeking to release supply in the short term.

3. The HFA has capital funding available to support both the Local Authorities and the Approved Housing Bodies. Individual local authorities may wish to engage in building programmes targeted at alleviating homelessness in their region, and we would welcome such initiatives, particularly where they are prioritised for provision to the Homeless sector. It will be difficult for many Homeless agencies to access HFA funding in the shorter term, for the reasons mentioned earlier. However, a number of existing AHB's are eligible for HFA funding and are capable of providing housing for homeless persons. We recommend those bodies be encouraged to provide a defined allocation of housing specifically for the use of the homeless sector, in consultation with relevant local authorities to ensure that nominations for such housing from the homeless population will follow.

Finally, we note that significant effort has been made by NAMA to identify properties in its portfolio which may be of use to the sector. Similarly, we understand that certain financial institutions may have a willingness to work with the sector to provide access to suitable properties through structured leasing arrangements. We consider these efforts to be potentially significant contributions to the available stock of housing.

## **Recommendations**

1. The leasing/availability agreement should be enhanced and a working group comprising one representative member from each of; the Department of the Environment, the local authorities, NAMA, the non-Government sector participants, the approved housing bodies, representatives of the Landlord community, the Housing Finance Agency and the banking community should be convened, to report to the Minister within 3 months on amendments to render the leasing scheme optimal.
2. All lead local authorities would prepare an inventory of voids in their region. This stock would be made available to be provided to AHB's or Sector NGO's by way of transfer, or at a nominal annual lease (for example, €1) with secure tenure for a minimum of ten years. In order to avail of a particular property, the relevant body must provide evidence that it has access to sufficient funding to return the property to an appropriate operational standard AND provide a guarantee that the property would be used to provide accommodation to homeless persons. Where void properties are to be leased to an AHB/sector NGO, rather than transferred, we consider that the local authority should assign the property as security for borrowings to refurbish the property.
3. Approved Housing Bodies and Local Authorities would be requested by the Department of the Environment to provide a statement of dedicated allocations of housing to the homeless sector indicating how many units will be available in each of 2014, 2015 and 2016, the transition period identified earlier in our report
4. The Housing Finance Agency should be mandated to suggest and provide a limited range of products for new development, refurbishment and acquisitions which can be used by AHB's and Local Authorities in funding development projects demonstrably ring-fenced for the use of the Homeless population, such products to be available for projects commencing by the end of June 2014. We also request that the HFA would work with prospective borrowers, without lowering credit standards, to assist them in achieving eligible status thus increasing the chances that the resources available are drawn down by the sector.
5. We recommend that the Department of the Environment, the DRHE and the Homelessness Policy Implementation Unit would continue engagement with NAMA

and other relevant financial institutions to secure access to suitable properties during 2014.

6. We request that NAMA identify appropriate single or smaller groups of properties that are currently vacant or will become vacant in the period to 2016, which could be put to use in the challenge of homelessness. We would also suggest that any properties made available by NAMA be ring-fenced for the use of the homelessness sector.
7. We recommend replacing the multiple accommodation-search activities that exist at present among homeless agencies with a single integrated Social Housing Rental Service in major urban centres

## 2.3 FUNDING THE SECTOR

### 2.3.1 Direct and indirect State funding

State provision to support homeless persons essentially derives from three sources, reflecting three separate concerns. The first is to provide for housing, and the Department of the Environment dispenses funding under Section 10 of the Housing Act 1988, which funding is augmented by Local Authorities again under the same legislative provision. The HSE provides direct funding towards the delivery of health and associated services principally under Section 39 of the Health Act 2004. Finally, the Department of Social Protection provides social welfare payments of different types which homeless persons may be eligible to receive.

Since 2010 the two principal funding sources – Section 10 and Section 39 funding – have been reduced. Section 10 funding has reduced by approximately 15% during that period, with Section 39 funding reducing by approximately 17%.

The State also funds other services, with which some members of the homeless population interact - for example Hospitals, Mental Health Services, Prison and Probation Services. As these are provisions to the population as a whole it is not possible to segregate use of such services and supports to the Homeless population, however it is to be borne in mind when considering the cost to the State of an individual remaining homeless for a lengthy period, and the benefits of supporting an individual to once again achieving independent or supported living on a sustainable basis.

The financial position of the Irish State remains challenged, and it is likely to remain so for the period to 2016. It is extremely likely that provision of State funding to the sector will be reduced over the period. There is also a significant risk that funding will be withdrawn or reallocated within budgets as a consequence of the overarching effort to manage public spending, resulting in a real reduction in funding to the sector.

Successful reduction of reliance on emergency accommodation for longer term housing needs offers an opportunity to reduce the overall cost to the sector. However, we would caution that this effect is not likely to be immediate, and will only be achieved as part of a managed transition process which addresses both qualitative and financial actions. The evidence from other countries is that while a Housing First approach is both qualitatively and economically superior, the period to transition is costly and requires careful management. Accordingly, we would suggest that an at least stable State budgetary provision to the sector should be maintained.

We note the very significant contribution of the HSE to the sector, and it's essential role both in improving the lives of homeless persons and in helping them to achieve a longer term solution to both accommodation and welfare needs. We acknowledge that very significant work is done by HSE staff in securing and administering funding for the sector, among many

competing demands on a limited resource. Much of the relevant funding is of grant in aid nature – under Section 39 of the Health Act 2004 - and, in our view there is a risk that this funding is vulnerable to amendment as part of overall budgetary adjustments. Accordingly, we would welcome a move to a system whereby there is a clear budgetary allocation of funding to the sector at HSE level.

We have observed in recent months the process by which current year budgetary provision has been reviewed and reduced. We are cognisant of the budgetary challenges faced by Government Departments in the current environment. We consider, however, that a managed transition will be significantly hampered if State funding is adjusted mid-year. Accordingly, we recommend that budget allocations be agreed in the final quarter of the preceding year, with if necessary an identified maximum contingency. This will we believe, permit all concerned to plan activity better and reduces the risk of reactionary adjustments to service as a consequence of unplanned mid-year funding adjustments.

### **2.3.2 Other sources of funding**

While the State contribution is the most significant source of funding of the sector, we wish to address some comments in relation to the other sources of funding and resource drawn upon by the sector in delivering both accommodation and services to Homeless persons.

A significant amount of funding is raised independently by participants in the sector, primarily from donations, bequests and other fundraising activities of the NGO sector participants. It is also notable that there is a very significant voluntary contribution to the sector, which is not measured formally in economic terms but the value of which is nonetheless extremely significant. It is fair to say that the effectiveness of the sector would be significantly impaired without such voluntary contributions, whether financial or in kind.

Much has been said about the provision of properties from the NAMA portfolio in recent years. It appears clear that NAMA has a willingness to engage with the sector, and has a positive disposition towards making available properties which are suitable. It is also clear that this has not been a straightforward process, and that there is much complexity even where suitable properties are identified. We suggest that NAMA may wish to give consideration to other approaches which may allow it to leverage its portfolio in an innovative manner for the benefit of the sector. We would also encourage NAMA engagement with devising amendments to the leasing scheme which would facilitate a greater flow of suitable rental properties to the use of the sector.

We have also noted that in other countries funding is provided by the sector in a structured way from sources other than the public exchequer. For example, in Finland funding is provided by, in addition to central State resources, the Slot Machine Association (RAY), towards the provision of housing. These are not approaches that have historically been considered in Ireland.

### **Recommendations**

1. We recommend that the budgeted State funding for the sector, from the Department of Environment, Department of Health, Department of Social Protection and Local Authorities, be maintained at the 2013 level for the three years of the transition plan to 2016.
2. We suggest that budgetary data for the following year be provided to the participants in the sector –State Agencies and Non-Government organisations - in the final quarter of each year with, if necessary, an identified contingent amount.

## 2.4 DATA

The primary source of information on the homeless population is from the PASS system, which is operated and managed by the DRHE. The system collects data from each of the bodies providing accommodation to persons within the homeless system. The system is currently being implemented in a small number of regions which remain outside the system and at present data from those regions is also collected from returns provided to the Department. PASS also records certain data on the case particulars of individuals, We have dealt later in this report with the data made available to us for the three quarters ending 30 September 2013. In this section, however, we wish to address a number of points relating to the type of data which is available and which is useful for measuring the progress made towards the goal of ending long term homelessness by 2016. In our opinion, the goals of data collection should be to provide information which permits those delivering services and accommodation with a means of:

- Understanding and reacting to the situation on the ground in real time, or as close thereto as possible; and
- Matching needs and resources, both from the perspective of providing appropriate accommodation and delivering required services

Currently, the indicators identified in the Homeless Policy statement of February 2013 and provided from PASS are;

- Number of new presentations on a daily basis
- Number of persons in emergency accommodation for longer than 6 months
- Number of persons leaving emergency accommodation
- Occupancy rate in emergency accommodation
- Number of persons moving on into independent living with support
- Number of persons moving on into independent living without support
- Number of persons sleeping rough voluntarily and involuntarily

The data collected on PASS is, primarily, accommodation management data, although additional valuable data is collected and planned additional modules will enhance significantly the collection of important service and care data. We have the following observations in respect of the available data categories:

- The PASS system is a strong platform for the collection of good quality data about homelessness.
- As currently implemented, the system focuses primarily on accommodation data.
- The record of “number of persons in emergency accommodation for longer than 6 months is not available in respect of some of the Local Authority regions. This is a significant limitation – in essence, this is the indicator of long term homelessness.
- We suggest that this indicator should be amended to represent the episodic nature of long term homelessness – that is, to capture persons leaving and returning to the system. The definition might, for example, refer to “persons consecutively in emergency accommodation for longer than 6 months OR for more than 6 months (non-consecutive) in the previous twelve months.
- There is an apparent difference in interpretation of what is required – different Local Authorities use averages, estimates and closing figures to capture the same requirement. This makes the data difficult to interpret on an overall basis.
- The data shows that approximately 1,950 persons were in emergency or temporary accommodation as at 30 September 2013.

- The data does not include a frequent measure of rough sleeping. The performance reports do contain factors and comments that may give an indication of the trend in rough sleeping, but a count is not frequently taken.
- Financial data collected shows that approximately €38.9m has been expended under Section 10 in the first three quarters of 2013. Spending includes (expected outcomes to end 2013 in brackets) 44.6% on emergency accommodation (51%).
- Expenditure includes an amount of €1.45m on Domestic Violence refuges (expected annual amount of €2.3m)
- The key indicators could usefully be reported at different intervals. This may mean that users of the data would accept some lack of precision to facilitate quick and frequent reporting, but would facilitate reaction to trends in data. For example, the number of persons in emergency or temporary accommodation for longer than 6 months might be reported on a monthly basis, and the number of presentations to homeless services daily might be usefully reported on a weekly basis.

We note that additional information is collected in respect of the homeless population - the HSE maintains records in respect of the delivery of health services to the population. Safetynet Ireland records clinical data in respect of members of the homeless population. It is desirable that a comprehensive picture of both the accommodation and service profile of the individual is captured, in terms of efficient management and delivery of the appropriate support and in terms of obtaining a proper understanding of the outcomes achieved from different approaches. In our opinion this should also be matched with relevant financial data.

We consider, nonetheless, that to seek to procure the ideal data capture and management system could divert effort and resource away from the most important work of delivering accommodation and services. There appears to be some disagreement within the sector as to the meaning to be attached to some of the PASS data collected, and we would observe from the performance reports that we have received that different lead authorities appear to interpret the requirements differently. We note in this regard that a data group has recently been convened and we welcome this as an initiative.

As a matter of public accounting, we observe that there is not a full and clear collection of the financial cost of the provision of accommodation and services to the homeless population. Neither is the provision of funding an accurate guide to the total expenditure on the provision of accommodation and services, as the publicly available accounting does not include the very considerable donated funding, nor does it include any reckoning of, again, the very considerable voluntary input to the sector.

Against this backdrop, it is extremely difficult to comment with any authority on whether the system as it currently pertains is efficient in an economic sense, as one has neither a clear representation of cost nor of the specific service outcomes attaching available to assist in such a determination. The complex interrelationships between organisations, between their funding and activities render it difficult to meaningfully assert whether any particular action or activity is demonstrably better or worse value.

## **Recommendations**

1. The Data Workshop Group convened by the CDT/NHCC should continue its work and agree by the end of January 2014 the definitions and characteristics of the monitoring indicators identified in the Minister's policy statement. This should include reporting timelines, who should get data and who is responsible for responding to indicators.
2. That the implementation of PASS be continued in a structured and timely fashion, with a focus on useful indicators of outcomes.

3. We recommend that the indicator for “Number of persons in emergency accommodation for longer than 6 months” should be amended to represent the episodic nature of long term homelessness – that is, to capture persons leaving and returning to the system. The definition might, for example, refer to “persons consecutively in emergency accommodation for longer than 6 months OR for more than 6 months (non-consecutive) in the previous twelve months.”
4. We recommend that in the longer term consideration be given by the Homelessness Policy Implementation Unit to developing a comprehensive model to express the full cost of provision of accommodation and services to homeless persons to support the assessment of value for money.

### 3 ADDITIONAL MEASURES

We have in our meetings with participants in the sector observed many positive features of the work done to address the key challenges of prevention of homelessness, delivering accommodation and delivery of services. We have also noted a number of areas where we believe steps can be taken to enhance services or improve the support and resourcing available to the sector. This is not intended as a comprehensive listing of the many good initiatives being undertaken within the sector. Neither is it in any way intended to undermine the many other positive initiatives that are being considered or implemented. The following points are, however, our selection of items to be acted upon urgently. We hope that we will be able to engage more fully with other initiatives in future periods.

As we have noted in the first section of this report, as things are arranged it falls primarily to the Department of the Environment to take the lead on following through the implementation of these items, working collaboratively with the HSE, the DRHE, lead Local Authorities and the non-Government Organisations working in the sector.

- a. Advocacy and the provision of information appear to offer a significant opportunity to prevent individuals becoming homeless. We would welcome the extension of funding available under Section 10 of the Housing Act 1988 to advocacy and information services.
- b. We recommend that the HSE would continue to establish multi-disciplinary Community Mental Health Teams as provided for in the “Vision for Change” plan.
- c. We recommend that Homeless Action Teams be implemented in all areas as a matter of urgency. This approach seems to enhance significantly the delivery of services and the prospect of finding solutions to challenging issues and cases.
- d. We note that Domestic Violence refuges are included in the funding and reporting by Local Authorities. This situation appears to have arisen historically because the Department of the Environment has supported the provision of accommodation, while the health services provided support for the service element. Accordingly, a distinct funding stream has not existed for the provision of accommodation to persons in need consequent to issues relating to domestic violence. It appears to us that the refuges are primarily concerned with the provision of a service to a specific population - those suffering from or at risk of domestic violence - who may also become homeless temporarily as a consequence. We are strongly of the view that such refuges are not homeless emergency accommodation and would prefer to see both a discrete funding stream and separate reporting for the provision of State support to the accommodation needs of persons experiencing domestic violence. This would seem to appropriately reside within the scope of the recently established Child and Family Agency. We recommend therefore that existing funding arrangements for the provision of refuge accommodation and services would be transferred to the Child and Family Agency.
- e. We suggest that the HSE provide for expansion of a scheme of medical cards to attach to specific facilities dedicated to the delivery of services to homeless persons. Where such cards currently are in place we believe that they are an effective example of a flexible approach that delivers service to vulnerable individuals and urge that they are maintained. We recommend that the Homelessness Policy Implementation Unit prepare a schedule of homeless facilities to which such a card should attach.
- f. We recommend that the scheme of provision of rental support be amended where two or more persons elect to share accommodation. At present, we understand that rent supplement payable for tenants in voluntary housing developments (funded through the capital assistance scheme) is capped at €55 per week for a single person and €60 per



week for a couple. We understand that these limits are applied also when individuals share tenancies (for example in a two or three bed apartment or house) the limit is also applied – that is a single payment of €55 is made, rather than per person. We recommend that this system be re-examined and that a specific provision be considered for previously homeless persons agreeing to share tenancies, which would attach a rent supplement to the person rather than the property.