

Homelessness Inter-Agency Group

Report to Minister for Housing, Planning and Local Government

June 2018

1. Introduction

In 2016, the Government published the Rebuilding Ireland Action Plan on Housing and Homelessness. The aim of the plan is to increase the delivery of housing across all tenures to help individuals and families meet their housing need and to help those who are currently housed to remain in their homes or to be provided with alternative options of emergency accommodation. The plan focuses on increasing the delivery of social housing, with a target of delivering 50,000 social housing homes in the period to 2021, while also making the best use of existing stock and laying the foundations for a more vibrant housing sector. A Housing Delivery Office is now established within the Department of Housing, Planning and Local Government. The Office, led by Minister of State Damian English, is working closely with local authorities to identify mechanisms to accelerate the delivery of social housing, together with assisting in identifying suitable lands across the State and Semi-State sector that are suitable for housing. Rebuilding Ireland also sets out a range of measures to address homelessness.

The Plan sets out five pillars as follows:

Pillar 1- Address Homelessness

Provide early solutions to address the unacceptable level of families in emergency accommodation, deliver inter-agency supports for people who are currently homeless, with a particular emphasis on minimising the incidence of rough sleeping and enhance state supports to keep people in their own homes.

Pillar 2 – Accelerate Social Housing

Increase the level and speed of delivery of social housing and other State-supported housing.

Pillar 3 – Build More Homes

Increase the output of private housing to meet demand at affordable prices.

Pillar 4 – Improve the Rental Sector

Address the obstacles to greater private rental sector delivery, to improve the supply of units at affordable rents.

Pillar 5 – Utilise Existing Housing

Ensure that existing housing stock is used to the maximum degree possible, focusing on measures to use vacant stock to renew urban and rural areas.

Many of the actions in the Plan are inter-related and inter-dependent and delivering the targets to address homelessness set out in Pillar 1 will be dependent on progress across the other pillars of the Plan. While delivering increased social housing will be critical, the actions in pillar one also recognise the need for individuals and families to be provided with the necessary supports while they are in emergency accommodation and to support their exits from homelessness into independent tenancies.

2. Role of the Inter-Agency Group

The Homelessness Inter-Agency Group was established by Mr. Eoghan Murphy, Minister for Housing, Planning and Local Government, following the Housing Summit held in September 2017. The Group was established to provide a more coherent and coordinated approach to the State's response to homelessness. The April 2018 Homelessness Report, published by the Department of Housing, Planning and Local Government showed that there were 5,963 adults (including 1,712 families with 3,689 dependents) in emergency accommodation. While there has been some stabilisation in the increase in the numbers in recent months, the numbers in emergency accommodation remain high. As such, it is critical that there is a coordinated State response in this area. The Group is chaired by Mr John Murphy, former Secretary General in the Department of Jobs, Enterprise and Innovation and has the following terms of reference:

- To bring about greater coherence and coordination in the provision of homelessness related services across the relevant Government organisations, including health and social care supports, welfare, employment and social protection supports, family supports as well as housing and emergency accommodation services. This will include accelerating the delivery of new supports and ensuring greater transparency and efficiency in the delivery of the various relevant funding streams.

- To consider the respective roles and responsibilities of the components of the State, including funded service providers, in the delivery of homelessness related services. The Group will identify programme inputs and will consider the efficiency with which these lead to Government objectives being achieved.

- To examine the scope for alternative policy or organisational approaches to achieve objectives in a more efficient, effective and coherent manner.

- To consider the framework of relevant supports relating to;
 - prevention supports (to prevent homelessness occurring);
 - homeless supports (to assist and support those in homeless services);
 - exit supports (to assist homeless households enter new independent tenancy arrangements); and,
 - tenancy supports (to ensure that previously homeless households maintain their new tenancies).

- To engage with other Governmental working groups and committees as required to further its objectives and, where necessary, to appoint its own ad-hoc and time-bound sub-groups, including expertise from other organisations, to undertake specific tasks or examine particular issues.

- The work of the Group is informed by the 'housing-led' / 'housing-first' policy objectives of the 2013 Homelessness Policy Statement and commitments entered into via the 2016 Government strategy Rebuilding Ireland: Action Plan on Housing and Homelessness.

The Group includes membership from the following organisations:

- County and City Management Association;
- Department of Children and Youth Affairs;
- Department of Employment Affairs and Social Protection;
- Department of Health;
- Department of Housing, Planning and Local Government;
- Department of Justice and Equality;
- Department of Public Expenditure and Reform;
- Dublin Region Homeless Executive;
- Health Service Executive
- TUSLA.

The Group has met on seven occasions since its establishment and has considered a range of issues where the respective Departments and Agencies have an involvement in policy formulation or in delivering services. A number of these areas will require further consideration and analysis by the Group.

3. Role of Departments and Agencies in Response to Homelessness

One of the issues tasked to the Group was to consider the respective roles and responsibilities of the components of the State, including funded service providers, in the delivery of homelessness related services. Homeless services in Ireland have traditionally been delivered by a range of Non-Governmental Organisations, who received funding from the State. The five largest organisations currently involved in

service delivery are Crosscare, Depaul, Focus Ireland, the Peter McVerry Trust and the Simon Communities of Ireland. However, a much larger range of organisations are involved in service delivery nationally.

The funding for homeless accommodation is met by the local authorities, which have responsibility for housing matters. Funding is provided to the local authorities for this purpose by the Exchequer, through the vote of the Department of Housing, Planning and Local Government. Dedicated funding is provided for health and care supports in homeless accommodation through the HSE's social inclusion budget. A range of other Departments and Agencies also provide resources for various aspects of homeless services and details of this are set out in section four below. A summary of the respective roles and activities of the key Departments and Agencies involved in the delivery of homeless services is set out below.

3.1 Department of Children and Youth Affairs and TUSLA

The Department of Children and Youth Affairs (DCYA) primary focus is policy development and implementation with regard to issues that affect children, in particular childhood care and education, child welfare and protection, but also family matters including domestic violence and young people leaving state care who may be at risk of homelessness.

As part of Rebuilding Ireland, DCYA launched a special provision under the current Community Childcare subvention programme, which provides access to free childcare on a part-time basis for the children of families experiencing homelessness. The provision provides subvention for all pre-school children aged 0-5 years and from June 2017, the scheme was expanded to include primary school children (aged 6-12 years) during the school holidays. Since its introduction in 2017, 235 children have been signed up for the programme with 156 service providers.

Tusla, the Child and Family Agency, is charged with supporting and promoting the development, welfare and protection of children, and the effective functioning of

families. Tusla operates under the aegis of DCYA. Tusla delivers a range of services which may be relevant to those experiencing homelessness including:

- Child protection and welfare services;
- Educational welfare services;
- Psychological services;
- Alternative care (including aftercare);
- Family and locally-based community supports;
- Early years services; and
- Domestic, sexual and gender-based violence services.

The DCYA and TUSLA have worked closely with the Department of Housing, Planning and Local Government and the Dublin Region Homeless Executive on the development of the supports provided in family hubs.

3.2 Department of Employment Affairs and Social Protection

The Department of Employment Affairs and Social Protection's (DEASP) mission is to promote active participation and inclusion in society through the provision of income supports, employment services and other services. The Department is also the largest payment organisation in the State. It operates the public employment service and directly funds a wide range of employment programmes and citizen advisory services. DEASP's primary role in relation to persons experiencing or at risk of homelessness is the provision of income support. A number of measures are being addressed as follows:

- Administration of the Rent Supplement scheme to approximately 33,000 recipients. DEASP has been operating the National Tenancy Sustainment Framework (NTSF) since 2014 which takes a flexible case by case approach in circumstances where there is a risk of homelessness where rent is being sought in excess of the existing rent limits. Since 2014, over 12,000 tenancies have been supported with increased rental payments under the NTSF.

- DEASP also operates a protocol arrangement with Threshold in Dublin, Cork, Meath, Kildare, Wicklow and Galway City. Over 3,000 tenancies are supported through increased payments under this arrangement.
- Participation in the inter-agency Homeless Action Teams (HATs) throughout the country. In Dublin, specifically, there is a dedicated Homeless Persons Unit (HPU) which works closely with other agencies.
- Provision of supports through Exceptional Needs Payments (ENPs) in a variety of circumstances; ENPs are especially important to homeless households with regard to, for example, certain travel costs, clothing and other expenses associated with households exiting emergency accommodation.
- Provision of funding for the employment of participants on a number of Community Employment schemes aimed at persons who are homeless or have had experience of homelessness.

3.3 Department of Health and HSE

The Department of Health and HSE are responsible for the delivery of a range of health-related services and supports to homeless persons. Under the Health Acts, in particular the 1953 Act, the HSE has statutory obligations towards homeless persons; today this is understood to mean responsibility for the delivery of health and social care supports to homeless persons either directly or through section 39 funded services.

The HSE provides 'in-reach' health services to homeless persons in emergency accommodation settings, including care and case management and intensive addiction and mental health supports. The HSE also provides outreach health and harm reduction services to homeless people and rough sleepers, including via the Mobile Health Unit. The HSE also provides wrap-around health services and

supports to help homeless people secure and sustain a normal tenancy and supports the development and implementation of hospital discharge policies for homeless persons. Issues of addiction and mental health are particularly relevant in the context of homelessness.

Along with housing authorities, the HSE takes a joint role in the delivery of homeless services through the Homelessness Consultative Fora at regional level; along with housing authority representatives, the HSE representative on these fora comprise the decision-making component of the Statutory Management Group.

3.4 Department of Housing, Planning and Local Government and local authorities

The Department of Housing, Planning & Local Government (DHPLG) is responsible for the provision of a national framework of policy and legislation to underpin the role of housing authorities in addressing homelessness at a local level. DHPLG takes a lead coordination role in relation to homelessness at Government level.

The funding model for homeless services provides for a devolved allocation-based system of Exchequer funding for the provision of accommodation and related funding to housing authorities. Local authorities are organised into nine regions, with lead authorities nominated in each region, with responsibility for project implementation and oversight within their regions. The Dublin Region Homeless Executive plays a critical role in coordinating the response to homelessness across the four Dublin local authorities, with approximately two thirds of those in emergency accommodation based in this region.

The Housing Sector oversees the following types of services for homeless persons:

- emergency accommodation provision, including hostel-type accommodation for homeless individuals and other supported facilities, e.g. family hubs;
- long-term supported accommodation for vulnerable individuals;
- Funding for the HAP Place-finders service, which supports individuals who have presented as homeless or who are in emergency accommodation, to

source accommodation in the private rental market through the payment of the rental deposit and up to two months' rent in advance;

- tenancy sustainment and resettlement supports; and
- contribution towards day services e.g. information.

3.5 Department of Public Expenditure and Reform

The Department of Public Expenditure and Reform is responsible for the management of public spending. The Department works closely with the various Departments and Agencies involved in the delivery of homeless services in relation to their resource requirements through the annual estimates process.

4. State Expenditure on Homeless Services

There is significant and increasing expenditure by State Agencies on supporting individuals and families experiencing homelessness. Based on the Group's analysis of current budgets, it is estimated that in excess of €234m in current funding was provided by the State in 2017 to meet operational costs of homeless services, including activities focussed on prevention. This figure does not include all of the staff costs and other administrative costs associated with service delivery. Nor does it include the cost of specific health services provided by the HSE, such as addiction services and mental health services, provided to those individuals experiencing homelessness. Additional funding provided by the NGOs from their own resources, such as fundraising, is not reflected in these figures.

A summary of the expenditure across the agencies in 2017 is set out below:

Agency/Department	Estimated Expenditure 2017	Summary of expenditure
Department of Children and Youth Affairs/Tusla	€13.5m	Homeless supports from Community Childcare Subvention Programme, Homeless liaison

		officer, funding of child protection posts, funding for facility for pregnant women and refuge accommodation.
Department of Employment Affairs and Social Protection	€39m	Tenancy Sustainment Framework, Exceptional needs payments, training programmes.
Department of Health and HSE	€34m	In reach and outreach health services, wrap around health services and support.
Department of Housing, Planning and Local Government and local authorities	€149m	€109m in Exchequer funding and approximately €40m from local authority resources to meet the operational costs of delivering homeless services.
Total	€234.1m	

In addition to current funding, increased capital expenditure has been allocated by the Department of Housing, Planning and Local Government to meet the cost of increased provision of emergency accommodation. These costs are primarily in the Dublin region where homelessness is most prevalent and has included the provision of a number of family hubs in addition to emergency hostel accommodation. Approximately €20m in capital expenditure was provided in 2017. An estimated €40m will be allocated during 2018, primarily towards family hubs which will continue to be developed in the Dublin region and elsewhere as required.

5. Engagement with NGOs delivering homeless services

Given the central role played by the NGOs in the delivery of homeless services, the Group undertook an engagement with the Sector to discuss the issues being faced by service delivery organisations and to obtain their views on what measures could be delivered more effectively.

Each of the NGOs in receipt of funding from the Department's homelessness budget was invited by the Group to make a written submission, setting out the organisation's role in the area and to set out proposals for new measures and to identify blockages to the successful implementation of existing initiatives. A total of 19 NGOs made submissions to the Group. To further examine the issues raised, a structured workshop was arranged with over 50 representatives from the relevant NGOs in attendance. Based on the content of the submissions, dedicated workshops were organised to focus on: health; justice-related issues, and family and youth homelessness. A summary of the key issues raised during these workshops is set out below.

5.1 Health Workshop

A common theme raised was the need for adequate resources to be provided for voluntary organisations who are meeting the health needs of those experiencing homelessness. Funding provided by the HSE, through its Social Inclusion Budget, has remained at similar levels since 2008. The funding for health supports is impacting on the capability of many of the NGOs to deliver the required services to those in emergency accommodation. Many of those engaging with homeless services have complex health needs including addiction, mental health and physical health. Increased interventions are required. While existing in-reach GP services, such as Safetynet, are playing a vital role in service delivery, it was suggested that more extensive interventions are required in many cases. The frequency of hospital admissions and challenges with discharges of homeless individuals was also a particular concern. The successful operation of a hospital discharge protocol is seen as vital in this area. A further issue discussed was the potential introduction of an intermediate step-up/step-down care facility. This would allow individuals to be prepared for admissions to hospital while also ensuring arrangements for discharge following treatment.

Mental health was also a prominent topic with a general consensus amongst the NGOs that there are insufficient mental health supports available to those

experiencing homelessness. It was suggested that accessing existing supports can be challenging due to the requirement for a referral from a General Practitioner. It was also suggested that there was a need for increased psychological support and counselling for those who have sub-clinical mental health requirements, particularly in light of the negative impact that homelessness can have on mental health.

Addiction is a common problem amongst those experiencing homelessness. There is a need for increased treatment for those experiencing addiction issues and greater provision of drug free beds for those tackling addiction. Difficulties can frequently be encountered in accessing housing for those who have completed treatment, which can heighten the likelihood of a relapse. There was also a focus on the need for increased prevention by providing greater supports to those with addiction issues before they become homeless.

In terms of accommodation solutions, there was a consensus on the importance of Housing First in providing a route for those with complex health needs into independent tenancies. In this regard, the importance of increasing the capacity for Housing First both in Dublin and nationally was agreed. However, there was also a discussion on a smaller cohort of individuals who may require longer term supported accommodation and the importance of consulting with individuals on their needs.

5.2 Family and Youth Homelessness

The importance of increased prevention in the area of family homelessness was a prominent theme in this workshop. With a large number of presentations of families from the private rental sector, the importance of tenancy protection services, such as those provided by Threshold was emphasised. In the same area, it was suggested that the powers of the Residential Tenancies Board need to be examined to ensure that landlords who breach the provisions of the Residential Tenancies Act are pursued.

While the introduction of family hubs offers a more suitable option than hotels, further hubs are required to reduce the numbers of families in hotels. It was also agreed that the operational arrangements in the hubs should be kept under review. The reluctance of some families to consider a HAP tenancy to leave emergency accommodation was also raised by two operators of family hubs.

A number of the NGOs raised the impact of reduced social welfare payments to individuals below the age of 25 as a potential concern in terms of the presentations of younger individuals to homeless services. It was noted that young people leaving State care are not subject to the reduction in Jobseekers payments from the DEASP and receive the full adult rate.

The issue of individuals formerly in State-care ending up in homeless services was discussed and further research is required to understand the extent of this issue.

5.3 Justice issues

A number of obstacles were identified at the Justice workshop as presenting particular difficulties in the sector. Language barriers are a persistent problem with translation and interpretation difficulties arising regularly. The PASS consent form being available in English only was cited as one clear example. To assist in countering this problem, it was suggested that consideration should be given to making information available in the commonly encountered languages along with increased availability of interpretation services.

Prisoner releases frequently present difficulties for NGOs in the sector. It was proposed that the provision of increased step-down facilities be explored. Media reporting of certain prisoners can also increase the challenges of providing housing. It was also suggested that the DEASP should reinstate the Community Welfare Officer prison in-reach scheme to reduce the number of prisoners presenting as homeless due to their economic circumstances. A targeted Housing First scheme

for prisoners could play a role in supporting vulnerable prisoners at risk of homelessness while also supporting reintegration into society and reducing recidivism.

The numbers of households in direct provision centres was raised. There are currently approximately 280 families who have been granted permission to remain in Ireland but remain in direct provision. There is a need for increased efforts to support these households into independent tenancies.

The issue of non-nationals with no rights to social housing supports was also considered. It was suggested that consideration should be made to providing accommodation on a week-to-week basis for these households rather than on the current night-to-night basis, which is resource intensive.

5.4 Challenges in service delivery

A range of issues being encountered by the NGOs in terms of service delivery were also discussed. These are outlined in section 7 below (service delivery).

5.5 Ongoing engagement between State Agencies and NGOs

It is proposed that further bi-annual engagements with the Inter-Agency Group and the NGO sector will be arranged to continue the engagement between the State Agencies and the service providers. These engagements can provide for a broader participation from the NGO sector than was previously the case with the engagement between the National Homeless Consultative Committee and the 'Cross Departmental Team'.

6. Specific issues considered by the Group

In examining the potential to improve current service delivery through identifying blockages in the implementation of current initiatives, or through the identification of potential new actions to improve current service delivery, a number of specific areas were considered by the Group. A number of these areas have a common theme in that they relate to the interface or in some cases to the boundary between homeless services and other policy areas.

6.1 Social Housing Policy

A number of areas in the broader housing policy area were considered by the group, including issues relating to access to social housing supports and the Housing Assistance Payment (HAP) in particular.

6.1.1 Inter – local authority transfers

One of the particular issues facing local authorities is where individuals and families present as homeless but do not have any entitlement to apply for social housing supports in that local authority. In some instances, the individual or family may be supported with short-term emergency accommodation but will not have access to longer-term supports and as a consequence can spend longer periods in homeless accommodation. There are also cases where families from the Dublin region have either sourced or been provided with emergency accommodation in the counties adjacent to Dublin, including in Louth and in Meath. In some cases, the families have expressed a wish to remain in those areas but are not entitled to apply for housing supports in those counties. While some arrangements have been facilitated on a bi-lateral basis, providing for a more formal system of inter-local authority transfers will allow for longer-term solutions to be identified for these families and

reduce the time being spent in emergency accommodation. Such a system would also contribute towards the Government's broader rural development policy agenda in that it could facilitate households wishing to move from urban areas to more rural settings i.e. rural resettlement.

6.1.2 Housing Assistance Payment (HAP)

The Housing Assistance Payment (HAP) scheme is a flexible and immediate housing support that is now available to all eligible households throughout the State. At the end of 2017, over 31,200 tenancies were being supported by the HAP scheme, including 17,916 additional households in 2017. Notwithstanding increased delivery of social housing units, it is clear that the private rental market, and HAP, has a vital role to play in preventing households entering emergency accommodation and also in providing for the exit of families in emergency accommodation in hotels and family hubs into independent tenancies.

Many families have chosen to avail of HAP as it allows them the flexibility to choose a property in their preferred area. The HAP Placefinders service in Dublin is proving very successful in meeting the social housing needs of many households who have been assessed as homeless. The Placefinders service can play an important role by providing the support and advice to households in locating and securing a tenancy, including financial support to achieve this. In many cases, an intervention can be made prior to a household ever having to enter emergency accommodation, supporting the household to find suitable accommodation with the support of the HAP payment.

The current Placefinders arrangements allow for a deposit of two months rent and a security deposit of up to one months rent to be paid by the local authority, on behalf of the household, to secure a tenancy. In Dublin, local authorities can utilise statutory discretion to exceed the maximum HAP rent limits by up to 50% where it is necessary to meet the needs of the family, while discretionary limits of up to 20%

beyond the prescribed limits apply in other local authorities. The Department of Housing, Planning and Local Government has made funding available to cover 90% of the staff costs of the Placefinders service. Ensuring that the Placefinders service is operating effectively in all areas where there are high levels of homeless presentations is critical in ensuring reduced use of emergency accommodation.

However, a proportion of families currently in emergency accommodation have expressed a strong preference for a local authority or housing association owned dwelling and indicated a reluctance to consider HAP as a solution. Local authorities have also reported that some households have chosen to enter emergency accommodation rather than considering HAP as an immediate way of meeting their housing need. A refusal to consider HAP has also been reported by a number of the NGOs working with families in emergency accommodation, with those families preferring to remain in emergency accommodation rather than consider a supported tenancy in private rented accommodation. It is understood that many families have a preference for a local authority owned property due to the perceived greater stability and security of tenure. Other families may have arrived in homeless services due to difficulties in the private rental sector. Nevertheless, given the unsuitability of emergency accommodation for long-term use, the overall demands for the supply of social housing units and the need for the best use of State resources, it is important that barriers to HAP acceptance be considered. Given the need to minimise the number of families in emergency accommodation, it also needs to be considered whether it is appropriate for the State to provide emergency accommodation to households who are unwilling to consider HAP, where HAP may offer an appropriate solution for that household.

As outlined, many of the households in emergency accommodation, or presenting to homeless services, have a preference for a tenancy in local authority housing. The current policy on HAP provides that households in receipt of HAP supports can avail of a move to other forms of social housing support, should they wish to do so, through the social housing transfer option, provided for in each local authority's own individual Scheme of Letting Priorities. Local authorities were also directed by the

Minister that HAP recipients, who apply to go on the transfer list, should get full credit for the time they previously spent on the waiting list and be placed on the transfer list with no less favourable terms than if they had remained on the waiting list. In practice, housing authorities offer HAP recipients the opportunity to apply to go on the transfer list at the point when their HAP application is approved. Given that the Scheme of Letting Priorities is a reserved function for local councils, different arrangements apply in different local authority areas; however, the available data indicates that some 1,105 HAP supported tenants have transferred to other forms of social housing. In this regard, the recent amendments to the scheme of letting priorities by Dublin City Council, which aim to incentivise the use of HAP by offering increased transfers to households in HAP tenancies, is an approach which might usefully be considered by other local authorities.

6.1.3 Delivery of Emergency Accommodation

With continuing presentations to homeless services, it is important that local authorities keep the need for the development of further emergency accommodation under continuous review.

During 2017, the Department of Housing, Planning and Local Government and the local authorities introduced a new model of emergency accommodation to reduce the numbers of families staying in hotels and B&Bs. Family hubs offer family living arrangements with a greater level of stability than is possible in hotel accommodation, with the capacity to provide appropriate play-space, cooking and laundry facilities. The operators of the hubs work with families to support their exit into independent tenancies. There are currently 21 family hubs in operation providing over 500 units of family accommodation. DHPLG is continuing to work with local authorities on the development of further hubs.

Despite the introduction of over 500 family hub spaces since 2017, there remains a significant number of families in hotel and B&B accommodation. Communication

with other State Agencies during the development of emergency facilities is important to ensure that those agencies have time to plan for their respective service delivery. This is particularly important for hostel type accommodation where there is frequently a high demand for health supports. These engagements can be facilitated at the local level through regional structures. However, it is also important that there is national oversight of this process to ensure that budgetary and resource management issues are coordinated effectively.

The high cost of providing emergency accommodation was discussed by the Group, particularly hotels, B&Bs and family hubs used for emergency accommodation for families. The Group was briefed on the Value for Money review that was underway in relation to the Department of Housing, Planning and Local Government's expenditure in this area. This review is due to be completed in July 2018.

6.1.4 Private Rental Market

The high level of demand for properties and increasing levels of rents has resulted in a significant level of presentations to homeless services. It is therefore critical that there is strong regulation of this sector, including ensuring compliance with the limits in Rent Pressure Zones (RPZs). A new Residential Tenancies Bill, currently being drafted, will provide for strengthened regulation of the private sector by providing new powers to the Residential Tenancies Board to investigate and prosecute landlords who implement rent increases that contravene the legislation relating to RPZ (4% per annum) in Rent Pressure Zones. The Bill also provides for increased protection for tenants by extending the notice periods for tenancy terminations by landlords.

The provision of increased notice periods should allow for greater time for tenants to source alternative accommodation. Consideration should be given to how to ensure that there is earlier engagement between households at risk of homelessness and the local authorities to allow for solutions to be addressed before a household presents to homeless services. Increased efforts in the area of prevention can assist in reducing the numbers of families entering emergency accommodation.

6.2 Homelessness and Health

Much of the increase in homelessness in recent years relates to the economic conditions in the property market, particularly with regard to family homelessness. Nevertheless, amongst a significant cohort of the homeless population, many individuals are facing additional health challenges, which can present a barrier to exiting homelessness into an independent tenancy. There is a high prevalence of mental health and addiction issues amongst the homeless population and it is vital that individuals with high support needs can access the range of health services and supports they require while living in emergency accommodation. Individuals in emergency accommodation can often present significant demands on the health service with high levels of presentations to Accident and Emergency Departments, frequently resulting in admissions to hospital.

It is recognised that housing is a key social determinant of health and wellbeing. It is therefore vital that individuals with high support needs access supported long-term accommodation.

Individuals in emergency accommodation are provided with health supports, funded by the HSE. However, there is a consensus amongst the service providers that there are a significant number of individuals in emergency accommodation who require substantial health supports to allow them to exit homelessness into an independent tenancy. Issues relating to mental health, physical health, substance abuse, or some combination of these are prevalent amongst those experiencing homelessness. It is important that appropriate housing solutions with the necessary supports be delivered to support the exit of these individuals from homelessness.

For some of those individuals, sustaining an independent tenancy will require ongoing and substantial health supports, particularly in relation to mental health and substance abuse. Otherwise, individuals may remain in homeless services for long

periods of time, due to their inability to sustain a tenancy without the necessary supports.

Better and more accessible data on the profile and needs of homeless people is required. The Department of Housing, Planning and Local Government, in conjunction with the Dublin Region Homeless Executive, recently commenced work on a survey to obtain more information on existing barriers to exiting homelessness. This survey will examine the number of individuals who require some form of health support. More detailed research in this area will be considered following the evaluation of the current survey results. Better data in this area will support the development of the appropriate strategies to ensure that individuals do not remain in homeless accommodation long-term.

Depending on the level of health supports required, different approaches will need to be considered to support increased exits from homelessness. For many of those with acute housing needs, Housing First (see below) may offer the best approach to an independent tenancy. Others with less acute health needs may be supported in independent tenancies with less intensive supports. However, a smaller proportion of those in homeless services may have acute health needs that make them incapable of sustaining an independent tenancy. It is not desirable that these individuals reside in Supported Temporary Accommodation for long periods and more secure arrangements need to be considered. Research is required to identify the cohort of individuals in this category.

6.2.1 Provision of Homeless Health Care

The HSE is funding the development and expansion of multi-disciplinary primary healthcare teams for individuals experiencing homelessness in each Community Healthcare Organisation (CHO) area. These teams include a mix of healthcare professionals including nurses, social workers, occupational therapists, mental health and addiction workers as well as administration support. The teams work in

each area to ensure that homeless people are linked with appropriate health and social care services and that partnerships with primary and secondary healthcare services and other relevant service providers are developed.

6.2.2 Hospital Discharge Protocol

Issues often arise with the discharge of homeless individuals following an admission to hospital. A National Hospital Discharge Protocol for Homelessness has been approved by the HSE, with the aim of ensuring that clear procedures are in place so that all discharges of a person experiencing homelessness or at risk of homelessness from acute and mental health care services are planned, with the necessary accommodation and supports in place prior to discharge. Key to this will be ensuring the availability of suitable (homeless) accommodation and that integrated care pathways are strengthened for those individuals experiencing homelessness who have complex health needs.

The Dublin homeless hospital discharge oversight committee involving acute hospitals, mental health, primary care/social inclusion, local authorities and the Dublin Homeless Network will lead on the pilot implementation of a Dublin-wide homeless hospital discharge protocol and an evaluation of the pilot project within a selected site. Effective implementation of a homeless discharge protocol in each CHO/Hospital group will follow, based on learning from the pilot.

6.2.3 Mental Health

Mental health issues are prevalent amongst the homeless population. However, accessing the supports for those in emergency accommodation can be difficult. In addition to the mental health supports already in place when presenting at Emergency Departments, the HSE has prioritised the provision of improved out-of-hours liaison and seven-day responses for mental health. A working group has been established to progress models of care for 7/7 and 24/7 services. The HSE is developing a plan to resource mental health services and supports in primary care

and homeless action teams across Dublin and the country. This project will create a stepped model of care in which the homeless population receives timely access and appropriate mental health care, addiction interventions and other secondary specialist services appropriate to their mental health needs. The model aims to establish clear pathways into specialist mental health services and addiction services, while supporting mental health staff working within the NGO structures with a clinical governance/supervision framework.

In addition, the National Office for Suicide Prevention has agreed to support a pilot two-year extension of counsellor availability to homeless persons in Dublin and the surrounding counties. The extension will facilitate crisis containment and resolution and will be evaluated for evidence of reduced demand for emergency department mental health services and self-harm rates with the potential for reduced risk for suicide in homeless persons.

6.2.4 Addiction Supports

The national drug strategy, 'Reducing Harm, Supporting Recovery' emphasises a health-led response to drug and alcohol use, based on providing person-centred services that promote rehabilitation and recovery. The strategy focuses on improving the range of problem substance use services and rehabilitation supports for people with high support needs that are homeless. This will be achieved through increasing the number of detoxification, stabilisation and rehabilitation beds in 2018 and strengthening interagency cooperation between service providers to address impediments to rehabilitation.

6.2.5 In-reach primary care and outreach services

The HSE is also enhancing in-reach speciality primary care services. The capacity of the mobile health clinic be increased to provide outreach services for hard to reach homeless people with complex needs in the Dublin area will increase from a three to a five-day week basis.

6.2.6 Intermediate Step Up/Step Down facility

The HSE will fund an intermediate step-up/step-down healthcare facility for service users who are homeless and require nursing and related care prior to hospital admission and post discharge from hospital. Capital funding for a new premises will also be considered.

6.2.7 Prescription charges

Homeless people in receipt of a medical card can access GP services and get prescribed drugs and medicines. However, as with all holders of a medical card, they are obliged to pay a prescription charge of €2 per item, up to a maximum of €20 per month. It has been pointed out that these charges can represent a greater financial burden for homeless people in emergency accommodation or who are sleeping rough. The Department of Health is therefore considering measures that would allow this cohort of the homeless population to be supplied with prescribed drugs and medicines without having to pay the prescription charge.

6.2.8 Health Funding for NGOs

The Minister for Health has established an Independent Review Group to review the role of voluntary organisations in the provision of health and personal social services. The group is looking at current arrangements regarding the role of voluntary agencies in the provision of services across the health and social care sector; to consider the issues currently arising and those likely to arise in the future; and to make recommendations on how the relationship between the State and voluntary organisations should evolve in the future. To inform its work, the group has launched a public consultation seeking the views of service providers, service users, the public, funders, regulators, and other interested parties. Details on this consultation process were provided to each of the NGOs involved in the delivery of homeless services.

6.3 Housing First

The Housing First programme enables people who may have been homeless and who have a high level of complex needs to obtain permanent secure accommodation with the provision of the appropriate supports, to help them to sustain their tenancy. Housing First is collaboration between the Department of Housing, Planning and Local Government, the Department of Health, the HSE and the local authorities. An implementation group has been established, including representation from each of the aforementioned stakeholders to oversee the delivery of the programme. A National Director of Housing First is based in the DRHE, with national responsibility for the programme. A National Implementation Strategy for Housing First is due to be finalised shortly, setting targets for the expansion of Housing First nationally.

To date in Dublin, over 220 tenancies have been created under the Housing First programme, which is being delivered by the HSE and the DRHE in conjunction with the Peter McVerry Trust and Focus Ireland. The current target under Rebuilding Ireland is for the creation of 300 tenancies in the Dublin Region. Housing First projects will also commence in Cork, Galway and Limerick during 2018, with the aim of supporting an additional 100 tenancies in total. The experience with Housing First to date shows a level of tenancy sustainment of approximately 90% so it is clear that the programme is delivering positive results. The implementation of the national plan can play an important role in supporting rough sleepers and long-term users of emergency accommodation to exit from homelessness into independent tenancies. In this regard, it is vital that the resources, including resources from the HSE, are provided to match the targets set out in the Housing First National Implementation Strategy. As highlighted previously, research is required to identify the number of individuals requiring the level of interventions provided by Housing First. Preliminary research has commenced in the DHRE and the ultimate aim should be to target all of the relevant individuals through the national implementation strategy. While rough sleeping and long-term homelessness may be most prevalent in the large urban centres, Housing First offers the potential to assist in addressing homelessness in all parts of the country.

A particular difficulty being faced at present is the supply of one-bedroom units. It is important for Housing First, and indeed for meeting the housing needs of many single people in need of housing supports, that a continued supply of one-bedroom units be delivered and made available for social housing.

6.4 Young people leaving State care

A prominent issue in the engagement with the NGOs was the number of people in homeless services who had previously been in State care. Again, there is a lack of specific data detailing the extent to which this is happening. Further analysis of this is required and the appropriate policy responses need to be developed by homeless services in conjunction with TUSLA and the Department of Children and Youth Affairs.

Work is ongoing between Tusla, the DHPLG and the local authorities to review and simplify the current protocol for the CAS (Capital Assistance Scheme) to ensure that the acquisition of properties for Approved Housing Bodies (AHBs) for the accommodation of care leavers, are progressed as quickly as possible. A Dublin area coordinating forum for AHBs and the DRHE has been established by Tusla, as well as a national coordinating forum for AHB's to ensure coverage in all areas and efficient implementation of the scheme. Approximately 40 properties have been purchased or in the process of being purchased under the scheme.

6.5 Access to facilities for families utilising emergency accommodation

The Group considered the situation relating to families who are awaiting allocation of emergency accommodation which does not become available until the evening. Tusla is in discussion with the Family Resource Centres to provide an evening support service for these families. In the interim Tusla has signed a contract (until

end 2018) with Focus Ireland for the provision of an evening support service to be provided to these families from the Focus Ireland Coffee Shop. This will include a child support worker, an educational tutor and a full-time volunteer who will be available to support the families as required. The facility will provide high quality food and separate rooms for children to do homework supported by an existing educational tutor.

6.6 Releases from Prison

Individuals released from prison continue to be a high-risk group to experience homelessness. A number of NGOs provide specific supports to individuals in this category and report that it can be particularly challenging to establish tenancies for certain individuals released from prison.

A protocol has been developed between the Irish Prison Service and the County and City Management Association. The protocol includes an agreement to provide a named single point-of-contact in each local authority for prison authorities to liaise with once a prisoner is identified as homeless, or at risk of being homeless, and preparing for release. To give effect to the protocol, the IPS engaged the Irish Association for the Social Integration of Offenders (IASIO) to provide Resettlement Coordinators for all closed prisons. These Resettlement Coordinators work in prisons to facilitate a prisoner to complete and submit their application for social housing to this single point-of-contact, in order to initiate the process to identify suitable accommodation in preparation for release. The Resettlement Coordinator then continues to liaise with this local authority official to make every effort to secure suitable accommodation arrangements pre-release. Ongoing monitoring of this protocol is required to ensure that it is operating effectively.

Preliminary discussions have also been held between the DRHE and the Irish Prison Service in relation to the scope for a national Housing First project for prisoners with

high support needs who would otherwise be homeless upon release from custody. This would necessitate the involvement of a range of stakeholders including the Irish Prison Service, Probation Service, Dublin Region Homeless Executive, local authorities and HSE. This proposal should be further developed.

6.7 Non-Nationals Accessing Homeless Services

Specific challenges arise for local authorities in dealing with individuals presenting as homeless who do not have the right to reside in Ireland or do not meet the habitual residency requirements to apply for social housing supports. In many cases, individuals without an entitlement to housing supports can spend significant time in emergency accommodation with no option to move on. In other cases, local authorities may only provide emergency accommodation on a night-to-night basis. This presents particular challenges for families with children. There is a need for a closer relationship between the Department of Justice and Equality and the local authorities in relation to non-nationals presenting as homeless or in homeless services. There also needs to be a clearer policy on the State's position on the provision of supports to those with no rights to reside in the State. This matter should be considered by the Department of Justice and Equality and the Department of Housing, Planning and Local Government.

In relation to the prevention of homelessness, there are also specific concerns around non-nationals granted permission to remain in Ireland. Persons who receive a permission to remain in Ireland arising from claims for international protection (under the International Protection Act 2015) can generally access State services in the same manner as the indigenous population. There are approximately 7,000 people in that process at the moment. Historically persons with a permission to remain linked in with local communities and local authorities to identify permanent accommodation for themselves and their families. In more recent times, and given the general pressure on accommodation, the Department of Justice and Equality has begun working with housing bodies and housing agencies to assist persons move into communities around the country. Individuals granted refugee status in Ireland, programme refugees or beneficiaries of subsidiary protection in this State may also

apply to the Minister for Justice and Equality to bring other members of their family to this State. Local authorities have reported presentations to homeless services where the family home was insufficient to accommodate new family members arriving in the State. It is important that there is planning and communication between the Department of Justice and Equality and the relevant housing authorities on demands for housing arising from 'family reunification' to prevent further incidences of homelessness from this cohort.

6.8 Data and Research

There is a need to have improved information available to the relevant State Agencies to inform better policy making, both in terms of supporting those experiencing homeless and developing interventions to improve the prevention of homelessness. We know from information provided by the local authorities, the HSE and the NGOs that there are significant challenges faced by a cohort of those in emergency accommodation to exit from homeless services into independent tenancies. However, there is a data deficit to allow for sufficient analysis in these areas. These issues include:

- Health issues including addiction, mental health and physical health;
- Lack of entitlement to housing supports (no link to local authority area);
- Individuals leaving State care and institutions;
- Non-nationals with no entitlement to housing supports; and
- Specific housing requirements (eg, adapted housing, Traveller specific accommodation).

The Department of Housing, Planning and Local Government has recently issued a survey to all local authorities to obtain preliminary data. The survey will provide useful information on specific challenges to be addressed to support this cohort from

emergency accommodation into independent tenancies. The responses to this will require inter-Agency cooperation.

More detailed research in the area of homelessness is required and the Department of Housing, Planning and Local Government should consider how this might be addressed in consultation with other relevant Departments and Agencies.

The Group also considered the current data being collated and published by the Department of Housing, Planning and Local Government. The Department publishes a monthly report, setting out the numbers of individuals in emergency accommodation in each of the nine administrative regions in place for the administration of homeless services and funding at local authority level. The report also includes details of the numbers of families and associated dependents in emergency accommodation across each of the regions. The Department also collates and publishes quarterly performance reports, which include more details on issues such as the numbers of exits achieved from emergency accommodation to an independent tenancy.

The monthly reports provide a useful indicator to measure the number of people in emergency accommodation. However, the information is limited in terms of the picture it provides in terms of activity. Accordingly, the Department should consider amending the reporting system to obtain more detailed information. A number of specific issues were considered by the Group in this regard:

- Details on the numbers of presentations and exits: including details in the reports on the numbers of individuals and families who report as homeless and access local authority services and emergency accommodation as well as the number of exits from emergency accommodation can provide important information on the flow of individuals both into homeless services and exiting into tenancies.
- Including data on the reason for someone presenting as homeless would provide increased information on the causes for homelessness,

both nationally and at the regional or local authority level. It would also support the formulation of policy responses to address these causes, in particular the development of policy to support prevention of homelessness.

- Including details of the length of time that individuals and families are spending in emergency accommodation would provide useful information to inform policy development. The performance reports from the local authorities show significant progress in exiting individuals from homelessness, yet there are frequent reports of families spending extensive periods in emergency accommodation. Accordingly, it would be useful for the Department to consider how this could be incorporated into the reporting structure.
- In addition to reporting on the number of exits, as suggested above, it would also be useful to consider reporting the route to a tenancy to provide information on the measures that are working to exit individuals and families from emergency accommodation.

While there will be additional work in compiling these more detailed reports, the frequency of these reports could also be considered to ensure that resources are deployed efficiently.

7. Service delivery

The Housing (Miscellaneous Provisions) Act 2009 provides for regional structures for the coordinated delivery of homeless services at the local level, including through the establishment of a management group and a homelessness consultative forum.

A Ministerial direction issued pursuant to section 39 of the Act provides that the management group is comprised of the Director of Services with responsibility for Housing in the lead local authority, a representative of the HSE and up to two persons from other statutory bodies. The Direction also provides for the membership of a Joint Homelessness Consultative Forum, pursuant to section 39 of the Act. The Act also provides for the production of Homeless Action Plans for each region. These action plans are required to specify the measures to be undertaken by the local authorities and other bodies providing services to address homelessness.

While lead local authorities report that there is generally effective cooperation at regional level, there is lack of consistency in the approaches being taken by a number of the statutory bodies across the regions. Given the increase in homelessness since 2010, and the changing profile of those experiencing homelessness, it would be timely to consider the operation of the regional structures. In particular, guidance should be developed at the national level to ensure a more consistent implementation of agreed policies at the regional level. Such guidance should inform the development of Regional Homeless Action Plans which are to be revised by the end of 2018. The membership of the management group should also be considered as part of this process.

As outlined above in section 4, there is significant funding being provided to deliver homeless services each year by a variety of State Agencies. A large proportion of this funding is being provided to a range of NGOs operating in this area. The majority of this funding comes via local authority funding, funded through the Department of Housing, Planning and Local Government and the HSE social inclusion budget. The local authorities and the HSE each put in place annual service level agreements with the homeless NGOs operating in this area.

With the increase in homelessness and the corresponding demands being placed on the services being delivered by the NGOs, a number of challenges are being faced by these organisations. There was a detailed discussion on these issues during the

Group's engagement with the NGOs. Particular difficulties are arising in relation to recruitment, partly related to the cuts imposed by the HSE but also more generally due to the strength of the labour market. The increases in homelessness and the significant expansion of a number of the NGOs involved in service delivery, has meant that the payment arrangements in place with local authorities are causing difficulties. Currently, payments are made on a quarterly basis in arrears and some NGOs reported that this is causing cash-flow difficulties. The Department of Housing, Planning and Local Government will work with the local authority sector to determine what improvements can be made in this area.

Where services are contracted by a local authority to a service delivery partner, the terms of the contract are generally documented in a Service Level Agreement (SLA). During the engagements with the NGOs, there was a degree of dissatisfaction in relation to how the SLA process is operating, in particular the delay which has occurred in the past in the agreement of the SLAs between the local authorities and the service providers. In a significant number of the homeless facilities operated by the NGOs, the residents have significant health demands. In such facilities, separate SLAs are in place between the NGO, the HSE and the relevant local authority. In some cases, the SLAs are negotiated separately with the HSE and the local authority and frequently agreed at different stages. The Group believes there would be benefits to aligning the process whereby the SLAs are agreed by the HSE and local authority with the NGO simultaneously. The structures in place via the Statutory Management Groups, established in each of the nine homelessness administrative regions, can facilitate HSE/local authority engagement on this matter.

There was also some discussion on the process used by local authorities to invite expressions of interest from NGO service providers. It was suggested that this process was overly focussed on price and promoting a competitive process. While value for money is critical, it was suggested that the local authorities should consider how tendering could facilitate collaborations between different service providers.

8. Recommendations

This report sets out the findings of the Group based on the work carried out to date. In many of the areas, more detailed examination of the issues is required by one or more of the Agencies involved. Accordingly, the recommendations outlined below do not represent a definitive or final response to ensuring the optimum inter-agency arrangements for addressing the current crisis of homelessness. It is important that the Group would continue to meet and ensure that the most effective State response to homelessness continue to be delivered.

8.1 Social Housing Policy

- That the Department of Housing, Planning and Local Government and the local authorities should introduce measures to provide that those who wish or are willing to move to another local authority area can be facilitated.
- An increased supply of one-bed apartments needs to be urgently addressed by local authorities as part of social housing delivery programmes to ensure that appropriate accommodation is available for Housing First candidates and the wider population of single adults requiring this type of accommodation.

8.2 Housing Assistance Payment

- Develop measures to encourage increased take-up of HAP by individuals or families in emergency accommodation, or at risk of entering emergency accommodation. This should involve a proactive engagement with clients, identifying their housing needs at an early point while also improving efforts to source suitable properties through the Placefinders Service.

- Placefinder officers should be appointed in all local authorities where the demand for the service exists. There should be detailed roles and responsibilities, as well as expressed working arrangements with NGOs working in the area, local estate and rental agents.
- Local authorities should ensure that arrangements are in place to provide for transfers from HAP to a local authority tenancy, that are consistent with the existing Ministerial Direction on this matter. This can increase the uptake of HAP from households which have expressed a reluctance to consider it heretofore.

8.3 Emergency Accommodation

- Continue development of family hubs to ensure that the use of hotels and B&Bs is minimised.
- Continue to review requirements for additional hostel/emergency accommodation by reviewing demands on existing services and by monitoring levels of rough sleeping.
- Review the continued provision of emergency accommodation to those who refuse to consider offers of appropriate housing supports.
- Ensure relevant Government Departments and State Agencies are notified of the development of emergency accommodation at an early stage to allow for a planned approach to annual planning for their service inputs and the associated budgetary implications. The Department of Housing, Planning and Local Government should lead on this.

8.4 Private Rental Sector

- Strengthen regulation of private rental sector through the introduction of the Residential Tenancies Bill to allow for, inter alia, increased notice periods for tenancy terminations, sanctions for landlords in breach of certain provisions of the Act, and powers of investigation to the Residential Tenancies Board.
- Local authorities should consider whether earlier engagement with at-risk tenants can be increased.

8.5 Health Services and Funding

- Health services for those experiencing homelessness should continue to be developed. Increased funding is required to enhance support for the transition of those in emergency accommodation into independent tenancies, in particular through the Housing First programme.
- The HSE should lead the development of an integrated model of care to address the complex needs of people experiencing homelessness, in conjunction with relevant stakeholders.
- A review of the impacts and effectiveness of Intermediate Care (step-up/step-down) should be carried out.
- The Department of Health should monitor the health outcomes for people who experience homelessness and identify relevant improvements in health policy coordination and service delivery.

8.6 Research on needs of those accessing homeless services

- Detailed research is required on the supports required by those experiencing homelessness to exit from homelessness into an independent tenancy. The

research should also consider whether there are individuals in emergency accommodation who will require long-term supported accommodation. There is also a need for an improved health data management system for homelessness. This research will be led by the Department of Housing, Planning and Local Government and the Department of Health.

8.7 Hospital Discharge Protocol

Review of the implementation of the National Hospital Discharge Protocol for Homelessness by the HSE in conjunction with relevant stakeholders.

- Pilot and evaluate the implementation of a Dublin-wide homeless hospital discharge protocol that strengthens integrated care pathways from hospital to community with the support of the Service Reform Fund.
- On-going review of the operation of the protocol will be required by these same stakeholders.

8.8 Mental Health

- Development and implementation of the plan to better resource mental health services and supports in primary care and homeless action teams across the country.

8.9 Addiction Supports

- In line with the commitments in Rebuilding Ireland and Reducing Harm, Supporting Recovery, increase the availability and geographical spread of relevant quality drug and alcohol services and improve the range of services available, based on identified need, to those experiencing homelessness.

8.10 Housing First

- The National Implementation Strategy for Housing First should set ambitious targets for the expansion of the programme on a national basis.
- Increased funding may be required for both the housing and health inputs of the programme and these should be costed and considered in the context of available resources. Any request for additional resources will have to be considered alongside competing resources in this and other sectors and within the context of the fiscal space.
- An increased supply of one-bedroom housing is required to ensure that appropriate units are available (see recommendation in this regard under 8.1).

8.11 Young people leaving State Care

- Research is required to determine the extent of the problem of individuals leaving State care finding themselves accessing emergency accommodation. On foot of this research, the existing Joint Protocol set out in Housing Circular 46/2014, relating to the accommodation needs of care leavers, should be reviewed and updated.

8.12 Releases from Prison

- The operation of the prison release protocol should be reviewed on a continuous basis by the Prison Service and the local authorities.

- Consideration should be given to introducing a pilot Housing First project for prisoners with high support needs who would otherwise be homeless upon release from custody. Initial discussions have been held between the National Director of Housing First and the Irish Prison Service on this subject.

8.13 Non-nationals accessing homeless services

- The Department of Justice and Equality, and the Department of Housing, Planning and Local Government should develop an agreed policy, including a communications protocol, on the services to be provided to individuals who may have no rights to reside in the State.
- A communications protocol should be put in place between the Department of Justice and Equality and the local authorities in relation to potential housing demands arising from family reunification applications being processed by that Department.

8.14 Data and Research

- Increased research is required around a range of issues considered by the Group and in the area of homelessness more generally. This should be considered by all of the relevant Departments and Agencies involved in the delivery of homeless services.
- The current reporting arrangements of the Department of Housing, Planning and Local Government should be reviewed to ensure that more detailed information is collected to support better policy making.

8.15 Regional structures

- The operation of the regional structures that have been in place since the introduction of the Housing (Miscellaneous Provisions) Act 2009 be reviewed to ensure that the current structures are operating effectively.

- Guidance in relation to the development of regional homeless action plans should be prepared and issued by the Department of Housing, Planning and Local Government to regional authorities.

8.16 SLAs with NGOs and Payment arrangements

- The operation of the Service Level Agreements that exist between NGO service providers and local authorities and the HSE should be reviewed with a view to aligning the processes such that SLAs are agreed in tandem and in a timely fashion.
- The potential for moving to monthly payments to the NGOs should be considered by the local authorities in consultation with the Department of Housing, Planning and Local Government.

8.17 Engagement with NGOs

- The Department of Housing, Planning and Local Government should convene meetings of the National Consultative Committee on Homelessness bi-annually.

8.18 Role of the Inter-Agency Group

- The Inter-Agency Group should continue to meet on a quarterly basis to coordinate the State's response to homelessness, including both the range of actions set out in Rebuilding Ireland and new initiatives being considered and developed by the Group.