

Focus Ireland Submission to the Joint Oireachtas Committee on Housing Planning and Local Government

Focus Ireland welcome the opportunity to provide our observations on this important topic. As the Committee will be aware Focus Ireland supported over 14,500 people who were either homeless or at risk of homelessness last year. We are the main provider of support for families experiencing homelessness in the Dublin region, are the designated provider of Housing First in both Dublin and Cork (partnering with Peter McVerry Trust and Cork Simon respectively). We have over 30 years' experience working with families that are homeless across the country.

Focus Ireland is represented on the National Consultative Committee on Homelessness (NCCH) and in 2013/14 participated in the collaborative development of the methodology for the monthly homeless reports through membership of the NCCH Data Subcommittee. We feel that this was an important exchange and consensus building forum and the decision of the Department not to utilise this resource in deciding how to respond to recent data issues is, we believe, a missed opportunity.

This is a point that we have raised with the Ministers office and with the Department of Housing Planning and Local Government in our submission on 25th May 2018¹. This submission includes a short background to homeless statistics that, for ease of reference, we have replicated for the committee below in the second part of this submission.

Summary

The decision to remove over 1,600 people from the official homeless statistics over the last number of months has undermined public confidence in the accuracy of housing and homeless statistics, reduced the credibility of important Government initiatives to tackle this national crisis, reduced our capacity to understand the changing nature of the crisis and distracted policy resources from issues of substance. These problems have been created as much by the piecemeal, unilateral manner in which the changes have been implemented as the changes themselves. The Department's Report on the Categorisation of Emergency Accommodation in Monthly Homeless Reports does little to correct this damage or explain the rationale behind it.

As set out in our submission to the Department (Appendix 2), the existing series of official homeless statistics published by the Department of Housing since April 2014 are the outcome of a collaborative process led by the Department, under the auspices of the National Consultative Committee on Homelessness (NCCH). The collaborative process of deciding how to most usefully measure homelessness recognized the importance of not placing an unreasonable burden on the administration of local authorities, while producing a figure that was sufficiently reliable to inform and guide policy. The fact that this approach has several limitations and that some anomalies would arise was full recognized by everyone concerned.

¹ Focus Ireland (2018) *Submission to the review of Department of Housing homeless figures*, Dublin, Focus Ireland Available at: <https://bit.ly/2PgFM4t> (Accessed 24th October 2018)

The Department's minutes of the NCCH meeting on the 17th May 2014² make this abundantly clear:

A trial exercise had recently been performed on PASS across all local authorities for a specified week in April. This exercise demonstrated that useful homelessness data could be generated quickly and without creating an unreasonable administrative burden upon local authorities. Some anomalies were noted in the data, it was observed that, as with all data, results would be subject to a margin of error with a requirement for subsequent verification but it was acknowledged that results will be sufficient to demonstrate the dynamics of homelessness.

Origins of the re-categorisation.

Despite the enormous growth in homelessness and public expenditure on homeless services, there is considerable evidence that the Department of Housing does not sufficiently resource the collection and analysis of homeless data. This emerges from the erratic schedule of publication of the monthly reports, the failure to upload the quarterly financial and performance reports from the regional authorities and the absence of publications which explore the patterns within the data and their implications for policy.

This failure to fully engage in the information that can be gleaned from the homeless data is evident right from the genesis of the re-categorisation process. The report, correctly, states that the process that led to the re-categorisation arose from 'discussions with a number of local authorities following higher than expected increases' in January (para 2).

However, it is clear from any review of the seasonal pattern of the homeless figures that there has been an increase in family homelessness every January/February since the series began – the increase in Jan/February 2018 was, in fact, the expected pattern³.

Emergency Accommodation.

The report correctly states that: "The Department's monthly homeless report includes details of adults, families and their associated dependents accessing emergency accommodation funded by local authorities." However, what is not made clear in this statement is that, under the definition agreed by the Department in 2014, 'emergency accommodation' is essentially understood as accommodation funded under Section 10 of the Housing Act and recorded on the PASS the national database, excluding long-term accommodation.

The report notes two quite distinct circumstances in which households were considered to be wrongly categorised:

- Some families were accommodated "in local authority owned stock or in properties secured by the local authorities under other arrangements"
- Some families had remained in their own home, due to additional rental support funded from the homeless budget.

²

<https://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Housing/FileDownload%2C40562%2Cen.pdf>

³ Stanley W, Allen M (2018) *Insights into family homelessness No. 13. Family homelessness end of year review 2017*, Dublin, Focus Ireland. Available here: <https://bit.ly/2pX9lfy> (Accessed 30th October 2018)

The phrasing in the first case does not explain very much, as it is the case that all properties in which homeless people are accommodated are 'secured by local authorities' under a variety of arrangements. However, from statements by the Minister, but not reiterated in the report, it would appear that, in fact, the distinction being made here is that these families were accommodated in properties where they have their 'own door'.

It also appears to be the case that none of these families has a tenancy agreement but are accommodated there under license. Finally it has also emerged these families are still considered homeless by the local authorities and are receiving homeless supports. In fact, given the large number of families in who hotels who do not have case management support (over 400 families), it seem likely that the families in these 're-categorised' accommodations are more likely to be receiving homeless supports than those who remain categorized as homeless.

Effort to improve the quality of emergency accommodation are widespread throughout the sector and are recognized as one way to reduce the harmful and damaging effects of homelessness. It should be noted that one of the implications of this change is to designate the highest quality emergency homeless accommodation as 'non-homeless', thus undermining the efforts of local authorities and NGO to upgrade the form of emergency accommodation provided.

It seems clear to us that the situation of these families would be properly described as 'homeless' under the definition set by the Department in consultation with the NCCH. The removal of these families from the official figures would be more accurately described as a 'redefinition' than a 'correction'.

In the second case, where families remain in their own home, there appears to be a strong case, on the basis of the information available, that such families should not be included in the official homeless figures, so long as they have retained their rights as tenants. We would note however that in the tables setting out the numbers of adults and children removed from official figures of homelessness there is no breakdown between the two reasons for 'recategorisation'. The information furnished in the tables suggests that the number of families in this second case is very small.

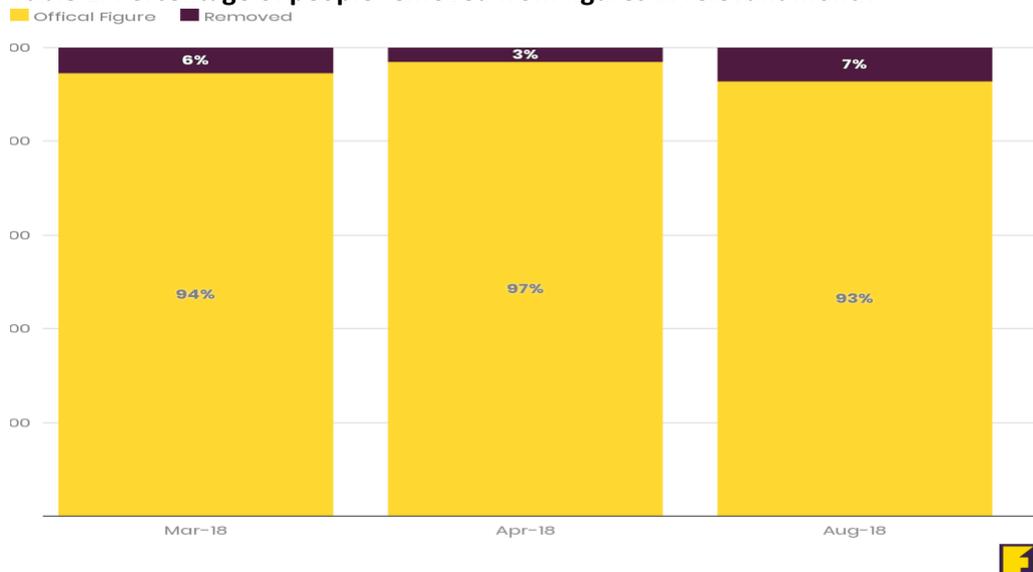
It is also notable that there is no further discussion on whether this is a permissible use of Section 10 funding and, if so, whether what appeared to be an effective preventative response should be extended.

Technical issues arising.

While the presentation of the tables is a bit unclear, it is assumed that the tables show three separate 're-categorisations' with no overlap of individuals/households between them. On this basis, the report shows that in total over 3 monthly counts 1,606 people were removed.

Table 1 below shows the percentage impact of this in each month. The largest removal being 7% of the total in August.

Table 1. Percentage of people removed from figures in relevant month⁴



However, these families which according to the Department had been wrongly categorized as homeless, were included in the figures for previous months – potentially for several months. A rigorous and serious attempt to rectify such a categorization error would have involved a restating of every previous month in which these families were present, so that a revised pattern of the revised definition would be available. The fact that this rudimentary exercise was not carried out leads further weight to the suspicion that the underlying motive was to produce a lower total figure.

A second technical problem arising from this process relates to how any improvement in the living situation of the families in ‘non-homeless emergency accommodation’ are to be reported. As local authorities still consider these 1,600 individuals to be homeless and are still providing homeless supports, it is to be assumed that some of them will move into more secure accommodation in the private or social housing sectors. Is this improvement to be counted as an exit from homelessness, even though their current situation is considered ‘not homeless’?

If so this could lead to a situation where in any given month 100 people enter homelessness and 110 people exit homelessness but the official figures increase, because 20 of the exits came from ‘non-homeless’ accommodation. The confusion would be further deepened when the household that moved from hotel accommodation into the ‘non-homeless emergency accommodation’ was also counted as leaving homelessness.

While this may appear to be a far-fetched concern, it should be noted that the Department currently includes households who were prevented from becoming homeless through rapid rehousing in its reported figure for ‘exits from homelessness’ – in other words families that have not been counted as *entering* homelessness are counted as *leaving it*.

⁴ The actual numbers are illustrated in graph form in the appendix

On the other hand, if households moving on from this new 'non-homeless' emergency accommodation are not counted it is hard for the Department to fully assess the value for money it is getting from homeless supports.

Involvement of the CSO

The final paragraph of the report sets out the ongoing work, with advice from the CSO, to provide broader and more consistent data. The inclusion of reliable publishing information on presentations and exits would be a welcome additional data and help us understand the constantly evolving pattern of the homeless crisis. However, on the basis of the recent handling of the homeless figures, re-establishing confidence in the homeless figures would benefit from a more central role for the CSO.

Concluding remarks

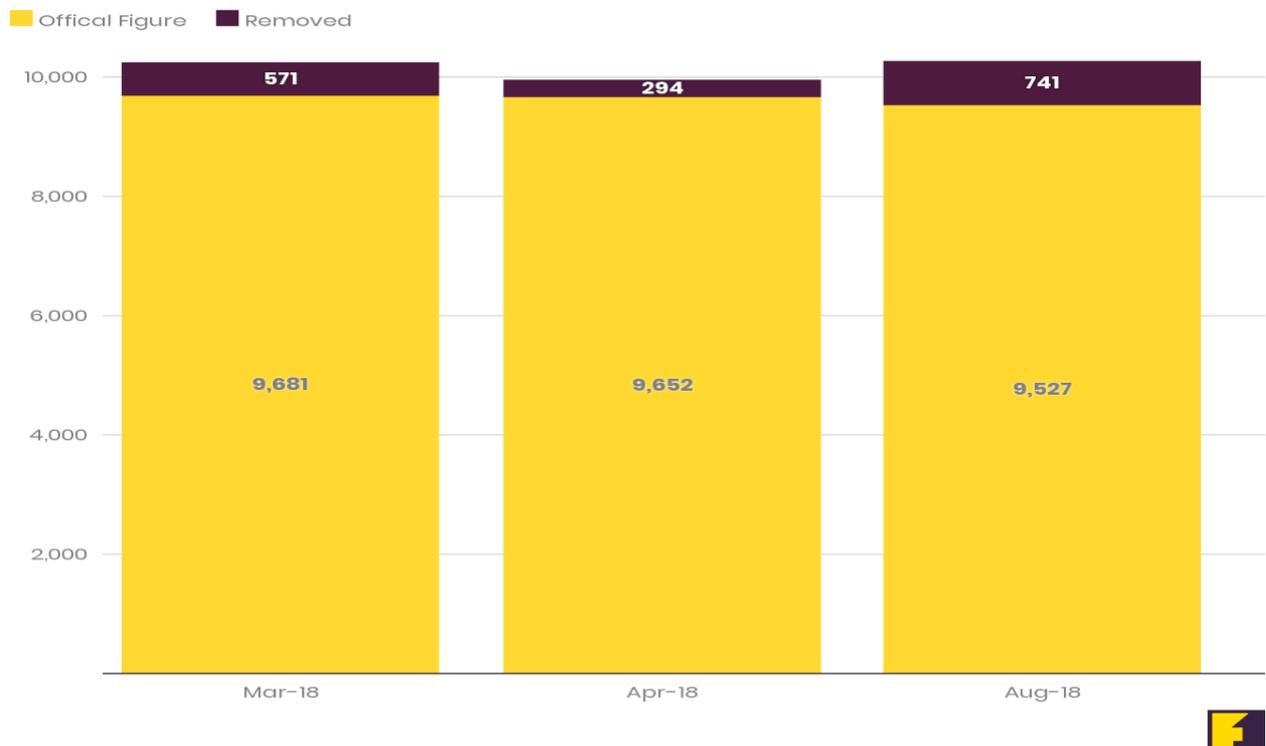
Focus Ireland has raised a number of concerns with the ongoing 'recategorization' of the official homelessness figures. The recent report by the Department does not allay these fears, does not answer key questions and raises new questions.

- Omitting families from the homeless statistics on the basis that the emergency accommodation which has been provided to them is of a higher standard (i.e. it has its own door) is a significant redefinition of homelessness which creates more anomalies than it solves, makes it harder to identify value of money and is not justified in the report.
- Omitting families from the homeless figures on the basis that they remain in their own home with additional funding supports appears to be a genuine correction, but this appears to account for a very small proportion of the of the 1,600 people removed.

Focus Ireland is also concerned that resetting the definitions of what is measured as homelessness is leading to changes of practice which are damaging to families. Despite the fact that the Government supports a Housing First approach, some local authorities are proposing that some of our housing stock be re-registered as 'transitional' so that families currently in B&B accommodation can move into it. In another area a local authority has increased barriers to families being allowed access to Hotel and B&B accommodation giving as one reason that they need to 'reduce reliance' on such accommodations. As already noted, the efforts of some local authorities to put in place a stock of high standard emergency homeless accommodation has been undermined by the decision to redefine that accommodation as 'non-homeless.'

Finally, the piecemeal fashion in which the changes have taken place has added to confusion, added nothing to the efforts to tackle homelessness and created controversy where collaboration is desired and needed. Giving a key role to the CSO in the compilation and publication of homeless data and a broad return to a collaborative approach to solving homelessness would go some considerable way to redressing these problems.

Appendix 1: Actual numbers removed from the official homeless figures.



Appendix 2 : Focus Ireland Submission to Department of Housing

Background to homeless statistics

There have been a number of different attempts to define and measure the level of homelessness over the last 30 years, and it is important to review the lessons of these measures so as to avoid repeating the mistakes of the past.

The landmark Housing Act of 1988 introduced not only the definition of homelessness which is still in use, but also required local authorities to carry out an assessment of the level of homelessness at least every three years. These reviews of homelessness were carried out along with the more general Housing Needs Assessment (HNA). However, lack of clarity about what should actually be counted as homelessness resulted in different local authorities essentially counting different things. As a result, the figures produced were of limited value for policy purposes.

The HNA continues to be compiled, now on an annual basis and published by the Housing Agency. This report continues to include details of the number of people categorized as 'homeless' on the local authority housing waiting lists. The methodological problems with this approach are still evident, however, and the most recent report contains three different figures for homelessness,

despite the fact that all three come from the same sources and are intended to measure the same thing.

In 1999, as the preparations were underway for the first National Homelessness Strategy, a new approach was taken to measuring homelessness. Called 'Counted in', this approach involved a detailed survey of all homeless facilities over a given period. The count was to take place every three years, but more regular counts were regularly proposed. The first counts were undertaken by the ESRI while later counts were undertaken by the Homeless Agency (the forerunner of the DRHE), with the active involvement of service providers. Particularly in the later 'counted in' surveys, extensive efforts were made to reconcile the survey data with the housing list data from the HNA.

'Counted in' produced detailed information on the characteristics and needs of people who were homeless but had a number of limitations, in particular the three year gap meant it was not effective at assessing the impact of new policy measures or changing circumstances. In the early stages 'Counted in' was only undertaken in Dublin. These limitations were difficult to address because the methodology was considered expensive and time-consuming. The last 'Counted in' survey was in 2008, and in 2011 the DRHE decided to discontinue the survey, citing the excessive costs involved as the primary reason.

There was no reliable measure of homelessness between 2008 and 2014, a period which it turns out would have been crucial in putting in place timely responses to our current homeless crisis.

During this period the homeless organisations, including Focus Ireland, strongly argued for some form of regular and reliable assessment of homelessness. In 2013 the then Department of Environment responded to these calls by establishing a sub-committee of the joint National Consultative Committee on Homelessness/Cross Departmental Team on Homelessness to make recommendations on how this should be done.

This sub-committee included not only Departmental and DRHE staff but also nominees from the local authorities and from the voluntary sector. The Department appoint Prof. Eoin O'Sullivan of Trinity College to chair the committee.

The sub-committee considered the ETHOS framework for understanding homelessness. This approach recognizes that a number of concerns interact to shape our understanding of homelessness – the need for physical shelter, the need for legal security and the need for private social space.⁵ The absence of all three domains is the most extreme form of homelessness – rough-sleeping. But the absence of any of these features can result in some form of homelessness. While this framework is extremely important in understanding homelessness it does not readily provide a practical system for regularly measuring how many people are homeless.

The sub-committee unanimously agrees that, for a range of conceptual and practical reasons, there is no single measurement of 'homelessness'. Any measure which is adopted could be critiqued for excluding certain groups or experiences or for including others. For many people experiences of homelessness are fluid, and in reality, large numbers of people move through different forms of

⁵ Busch-Geertsema, V., 2010. Defining and measuring homelessness. Homelessness Research in Europe: Festschrift for Bill Edgar and Joe Doherty, pp.19-39. https://www.researchgate.net/profile/Volker_BuschGeertsema/publication/268055088_Defining_and_Measuring_Homelessness/links/5469bc230cf20dedafd0f0c0/Defining-and-Measuring-Homelessness.pdf

precarious housing in ways which are extremely hard to measure. The committee came to the collective view that it is important to select a measure which is 'broadly accurate', and to ensure that data collection was not excessively demanding on resources and did not create protracted and time-consuming debates about particular circumstances on the margins of the measurement.

For these reasons it was agreed to recommend that the measure be based on the administrative data collected on PASS. The definition of what was to be measured was 'people residing in emergency accommodation paid for by Section 10 funding.' The definition of 'emergency accommodation' is normally fairly self-explanatory, but where there is doubt was understood to mean accommodation where no tenancy agreement is in place.

In addition to its practical benefits, this approach has the benefit of linking the 'homeless statistics' with the legally defined practice of local authorities. For a household to be provided with accommodation using Section 10 funding they must have been assessed as actually being homeless under Section 2 of the same act. The agreed measure is therefore particularly useful to the Department of Housing and local authorities as it measures exactly the form of homelessness which drives departmental expenditure.

It was recognized that there are number of homeless facilities which would be excluded from these figures, notably non-Section 10 funded homeless accommodation run by voluntary organisations (e.g. entirely donor funded facilities) and facilities funded by other Departments (e.g. domestic violence shelters). It was agreed to explore the extent of these issues.

A detailed survey was undertaken of homeless facilities not funded by Section 10. The results of this survey indicated that while a number of individuals were accommodated in privately funded homeless shelters, the number did not materially change the picture of the extent of homelessness. It was agreed that, while this fact needed to be taken into account in policy interventions, the survey did not need to be repeated on an on-going basis, nor did these individuals need to be included in the reported figure.

The Department of Environment raised the issue of the numbers in Domestic Violence shelters with the Department of Children and Youth Affairs and various administrative issues came to light. We understand these continue to be pursued by the DCYA and Tusla. Again, while it was agreed that the inclusion of households in such shelters would be in line with the Ethos typology and would result in a more accurate picture of homelessness, they would not materially impact on the reliability of the picture available from the PASS data.

The group recommended that the figures be published on a quarterly basis. The Department of Environment and DRHE decided that it was not overly onerous to produce the figures on a monthly basis and that this would provide a more meaningful picture, and decided to publish on a monthly basis from July 2014.

Despite the pressure of rising homelessness since 2014, and the tensions that this inevitably creates, the reliability of this data series has been remarkably widely accepted by all stakeholders, and has been crucial in framing the responses in Rebuilding Ireland and elsewhere.

Focus Ireland has proposed that the collection and publication of this data could usefully be transferred to the CSO, in much the same way at the CSO collates and publishes other Departmental administrative data, such as the Live Register. However, this proposal specifically relates to the publication of the existing data as derived from PASS. We do not support proposals, that the CSO should be asked to look at alternative means of measuring homelessness or that the present series should be discontinued while the CSO reviews such proposals.