

Focus Ireland response to Office of the Children's Ombudsman report 'No Place Like Home'

1.0 Introduction

Focus Ireland welcomes the Ombudsman for Children's Office (OCO) *No Place Like Home* report as a valuable and insightful contribution to the debate on responding to the needs of families who are homeless. In particular, the voices of children are an important contribution to our collective understanding of the impact of family homelessness.

We also welcome the opportunity to present to the Committee our response to the report and would like to take this opportunity to also welcome the Minister for Housing's response in seeking the views of voluntary organisations responding to family homelessness.

Focus Ireland has extensive experience working with families who are homeless, including:

- We operate the Family Homeless Action Team (FHAT) on behalf of the Dublin Regional Homeless Executive (DRHE), with additional funding from Tusla, the HSE, and our own fundraising. Focus Ireland's role is to support families to exit homelessness. The FHAT provides case management to almost 500 families, some of which are in Family Hubs managed by private or not-for profit organizations, while others are in hotels/B&Bs.
- We have operated supported temporary accommodation for families with high support needs in Aylward Green for many years.
- Focus Ireland manages and provides support in one Family Hub in Limerick, which is an own door facility.
- Focus Ireland operates a pilot Housing First for Families service on behalf of local authorities in the South East, working with the most vulnerable families.
- Focus Ireland is currently engaged in an initiative involving both research on international best practices and networking with key stakeholders to identify how therapeutic supports for children who are homeless can be best delivered in a cross-sectoral way.

2.0 Scope of the report

It is important to remember that in focusing on Family Hubs the Ombudsman's report is looking at the highest quality emergency accommodation available to families who are homeless. While this focus is warranted¹ a number of observations should be made before considering the findings:

¹ The unsuitable nature of hotel/B&B accommodation is widely acknowledged, and *Rebuilding Ireland* sets a goal of ending the use of such accommodation.

2.1 *The majority of homeless children live in hotels/B&Bs, not Family Hubs.* The OCO report sets out that in August 2018, only 580 of the 2,821 children homeless in the Dublin Region – just a fifth – were staying in Family Hubs. Many of the families outside the Hub system do not have the benefit of support from a Case Manager; they have to manage homelessness alone.

Ensuring that every homeless family has both case management and child support workers regardless of the type of emergency accommodation they are staying in should be a priority.

2.2 *Families need a home.* Many of the issues flagged in the Ombudsman’s report are intrinsic to all emergency accommodation: whether Hub, B&B or hotel, congregated settings are not suitable for accommodating families for anything beyond an emergency period of a few weeks.

There is no ‘perfect Hub’: the most important thing for every one of the 1,733 families that were homeless in March is to ensure they have their own homes as quickly as possible.

2.3 *Child Support Workers mitigate the trauma of homelessness.* In the context of the negative experiences families reported, both parents and children spoke appreciatively about the skills, kindness and diligence of the staff they worked with, particularly Child Support Workers, and the difference those staff made in helping them negotiate their way through homelessness.

Skilled staff focused on the needs of families can mitigate the traumatic impact of homelessness.

From Focus Ireland’s perspective, many of the issues identified in the OCO report arise from the fact that Family Hubs were established in the absence of clearly articulated objectives. The implications of this lack of clarity are discussed further below.

3.0 The importance of clear objectives for Family Homeless Hubs

3.1 What is a Family Hub?

When considering the performance of any public policy initiative, we need to compare outcomes to the objectives set for the programme. However, the OCO makes clear that the programme of Family Hubs has been embraced without clear objectives, rationale or even an evaluated pilot. The report (p.7) quotes the clearest articulation of the policy behind Family Hubs as being:

“to provide a form of emergency accommodation that offers greater stability for homeless families, facilitates more co-ordinated needs assessment, and support planning, including on-site access to required services (such as welfare, health and housing service) and provides appropriate family supports and surroundings”.

However, it would appear that other policy objectives are expected or implied, for example, government spokespersons have frequently stated that families exit homelessness more quickly if they are allocated to Hubs than if they are not. It is not clear what this expectation is based on: there is evidence that *case management* in itself helps families leave homelessness more quickly, but many families in hotels/B&Bs have case managers, so it is not clear what supports other than case management would lead to speedier exits from Hubs.

Focus Ireland's experience is that families managing the crisis of homelessness have no alternative but to spend most of their time dealing with immediate challenges such as getting children to distant schools, or finding a place to stay that night. The time and energy they have to devote to the process of finding a new home is limited by the time-consuming nature of such tasks. This is one of the key benefits of a case management (or key worker) approach: as well as assisting with the task of finding a sustainable exit route from homelessness, it also supports in addressing those practical day to day challenges, so reducing family stress – which in turn reinforces the primary objective.

3.2 Who are Family Hubs for?

The stated objective for Family Hubs (quoted above) would require an allocations policy that prioritised more vulnerable families for accommodation in Family Hubs – these are the families where the need for stability, needs assessment and support planning, and on-site access to services is greatest. However, if the objective of Hubs is to maximise the exits from homelessness, then families whose homelessness is primarily caused by economic issues would be prioritised for allocations, as they will move on more quickly.

There are merits in both policy approaches, but they are different - with implications not just for who should be allocated to Hubs but consequently on staffing levels, training, facilities and measurements of success.

3.3 Facilities in Family Hubs

The Ombudsman for Children states (p.7) that “it is impossible to identify a typical or standard Hub”. Hubs differ in respect of physical facilities resulting in different types of cooking arrangements, whether homework and play areas are available, the number of people expected to share one bedroom, rules in relation to visitors etc. These differences emerge strongly from the testimony of children living in Hubs.

It is therefore not possible to make general statements about Family Hubs. The protestations of some providers that “our Hubs aren't like that” may well be valid, but overall, this absence of clear standards undermines public confidence that any Family Hubs are meeting the needs of homeless families. Clearer standards are in everyone's interest.

3.4 Child support workers

Focus Ireland's work with homeless families has demonstrated the value of including child support workers as an integral element of the supports needed by families coping with homelessness.

In 2013, Focus Ireland launched a Social Impact Investment (SII) pilot project– in collaboration with the Homeless Agency and the Department of the Environment² - to support around 170 families, who had been homeless and living in B&Bs for several years, out of homelessness into secure homes.

The Focus Ireland SII model of support included Case Managers (to work with families), Child Support Workers (to respond to the different needs children of different ages have in coping with homelessness) and Accommodation Finders (to source suitable housing).

The Social Impact pilot was an overwhelming success, with all but two families making sustained exits from homelessness. Evaluations highlighted the importance of Child Support Workers in achieving that outcome. These findings are echoed in the findings of the OCO report: families highlighted the positive role such

² Now the Dublin Regional Homeless Executive and the Department of Housing, respectively.

support workers can play in children's lives – helping provide stability, supporting children (and parents, as appropriate) with the various challenges they face, helping them to stay in education while homeless, and supporting families make a *sustainable* exit from homelessness.

The Social Impact project was re-funded as the Family Homeless Action Team, with HSE (and later Tusla) continuing to fund Child Support Workers. While unfortunately the ratio of children to support workers has not kept pace with need, and there are now long waiting lists for support, this remains the model of Focus Ireland support.

Unfortunately, the lessons of this successful initiative were not carried forward into the Family Hub model and, to our knowledge, few Family Hubs employ child support workers as an integral part of their practice. From Focus Ireland's experience, any enhancement of the Family Hub model must include consideration of the benefits to families and children, and the sustainability of exits from homelessness that resourcing sufficient Case Managers and Child Support Workers provide.

3.5 Conclusions

The lack of clarity about the objectives and expected outcomes of Family Hubs means that there is no clear targeting around allocations to them, about the number and training of staff or the on-site services which are essential or appropriate³.

While Focus Ireland agrees with the Ombudsman for Children's conclusion that a full evaluation of Family Hubs is warranted, we stress that such an evaluation needs to be based on a clear articulation of the rationale for, and objectives of, Family Hubs.

4.0 Recommendations

The report of the Office for the Ombudsman for Children sets out a number of priorities for action, both from the perspective of the OCO (p.26-7), as well as from children themselves (p.53-60). In general, Focus Ireland supports these priorities and in response we make a number of specific observations below:

4.1 Limits on the time spent in emergency accommodation: Focus Ireland supports this recommendation, but stresses that the manner of its implementation is key. It should be framed as placing an obligation on local authorities to identify suitable accommodation for families within a given time period – no longer than six months. There should be no possibility that a homeless family is forced to leave emergency accommodation when they still have no home to go to.

It should be noted that the priority currently placed on support organisations to maximise the total number of families that exit homelessness works against the interests of more vulnerable and harder to place families. The inevitable consequences of a single-minded focus on the number of exits will be an

³ Confusion as to the purpose of Family Hubs has been exacerbated by the decision of the Department of Housing to reclassify families accommodated in the highest standard of Family Hub (with own door accommodation) as not 'homeless' for the purposes of statistical reports. This leaves families in a kind of 'no-man's land': they remain homeless under the legislation governing determination of housing need by local authorities, yet despite not being included in the homeless population by the Department, they are still expected to move on from this accommodation, in which they are denied legal tenancy rights.

ever-increasing concentration of vulnerable families with complex needs living for long periods in emergency homeless accommodation.

In addition, local authorities which restricted/removed homeless priority from their housing allocation schemes should reflect on the fact that this closes an important route out of homelessness for the most vulnerable children and can increase stigmatisation of the families experiencing homelessness.

4.2 Accommodation practices: Focus Ireland shares the OCO’s concern about the continued reliance on the practices of ‘one-night-only’ and ‘self-accommodation’ by local authorities across the country, we are only too aware of the additional stress this places on families and the further trauma it imposes on children; we welcome the recommendation that a time frame be named in which to end such practices entirely.

Data: we welcome the recommendations in relation to better data on families who are homeless, in addition to the areas outlined in the OCO report, Focus Ireland highlights the need for more robust data on the length of time families are spending in ‘emergency’ accommodation. Publicly available data shows that the percentage of families who were more than 18 months in emergency accommodation has grown from 18%, (178 families) in February 2017 to 27% (341 families) in March 2019. This recommendation could usefully be progressed through the Data Sub-Group proposed at the recent National Consultative Forum on Homelessness.



Source: Dublin Region Homeless Executive



4.3 Combating stigma, supporting dignity: Focus Ireland has already discussed the issue of reducing the stigma of homelessness with the Press Ombudsman, and supports the OCO recommendations in this regard. It would be helpful to explore the issue of producing guidelines on this issue.

The OCO report confirms many of Focus Ireland’s concerns about the traumatic impact of homelessness on children and parents. Becoming homeless is a traumatic event, that trauma is frequently exacerbated by the experience of living in emergency accommodation. In this context, we strongly support the OCO recommendation that practical measures – such as an increase in therapeutic supports and child support workers – that could be implemented to “support the resilience, dignity and self-worth of children and parents while they are living in emergency accommodation” (p.30).

As noted above, Focus Ireland is currently engaged in an initiative to identify how therapeutic supports for children can be best delivered in a cross-sectoral way, efficiently and effectively, and we draw the Committees and the Department’s attention to that initiative.

4.4 *Increased space:* We agree with the recommendations in relation to adequate space, including communal space, and separate bedrooms for children and parents; Focus Ireland believes these standards should be included in a clear definition of the role and purpose of Family Hubs, as discussed above - there is little point in having a named strand of better emergency accommodation unless all examples of it meet appropriate minimum requirements.

Focus Ireland further notes that the best form of short-term homeless accommodation is undoubtedly 'own door' accommodation, which overcomes many of the physical limitations of shared and institutional accommodation. This is the main form of accommodation provided to homeless families in the UK, and while data for families in 'emergency accommodation' and 'own door temporary accommodation' are published separately they are all considered homeless.

A number of local authorities in Ireland, including Waterford County Council, appear to be following this approach rather than the 'Family Hub' model and this alternative approach should be encouraged and included in the proposed evaluation.

4.5 *Restrictions on freedom:* OCO recommendations concerning greater freedom for children are clearly desirable, but need to be assessed within the context of what is inevitably an institutional setting. Recommendations in relation to alcohol and drug use are equally important and valid, yet raise real practical challenges in practice. While there would be a strong case for some Hubs to be designated as drug and/or alcohol free spaces, this would inevitably lead to the imposition of strong rules and some parents being barred. This could result in the families with the greatest social problems being accommodated together in facilities where drug use and chaotic behaviour is tolerated, and this would clearly not be acceptable.

This dilemma again highlights the fact that, while homelessness is a dreadful experience for all families, it places even greater risks on the children of families who were struggling before the crisis of homelessness occurred. Focus Ireland has 20 years' experience of working with high support needs families in Aylward Green and would be happy to share our experience and service standards for such services.

More generally, the above emphasises Focus Ireland's position that institutional congregate responses to homelessness are inappropriate and unsuitable, particularly for children.