



Focus Ireland **Budget 2022**

Recommendations
to Government

Challenging
homelessness.
Changing lives.

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Ireland

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Recommendations
to Government

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Section 1: Introduction

This submission was drafted in July 2021.

There is no doubt that the potential impact of the Covid-19 pandemic on housing security was mitigated by the protective measures introduced to prevent evictions and rent increases, and to ensure renters had access to emergency Rent Supplement. In addition, many local authorities and Approved Housing Bodies (AHBs) were quick to take advantage of the availability of more accommodation to house people experiencing homelessness, open cocooning facilities and ensure social distancing was possible in emergency accommodation. It is one of the positives of the pandemic that the homeless population were largely kept safe from the virus, despite their inability to ‘stay home’.

While the number of people in homeless accommodation declined over 2020, much of this was due to a welcome reduction in the number of families with multiple members availing of emergency accommodation. The number of single people presenting as homeless continued to rise, particularly in Dublin. As result, the number of homeless households, which should be the key measurement of homelessness for policy makers, remained a historically high levels despite the Covid-19 protections.²

In addition, the disruption to construction led to a drop in the number of completions of new-build homes expected in 2020. As the economy recovers, the finite number of units available for purchase or rent will be squeezed once again as retail, hospitality and offices reopen. Already the number of families becoming homeless each month is beginning to return to pre-pandemic levels – with 79 families becoming newly homeless in April 2021³. Serious consideration must be given to the policy levers available to ensure that we prevent a renewed rise in homelessness. None of the underlying causes of the current housing crisis have been addressed, which means that the return to ‘normal’ will inevitably lead to a rise in the number of people experiencing homelessness. Bold moves are now required to prevent this happening.

The Economic and Social Research Institute (ESRI) has called for the State to take advantage of low borrowing costs in order to facilitate a record level of capital investment in housing. We echo this call. While the establishment of the Commission on Housing in September 2021 should help to bring together expertise across the different aspects of policy affecting the long-term ability of the private market to build adequate housing at affordable levels, it will nevertheless remain the case that, in the short to medium term, the private market will continue to struggle to deliver anything near the number of homes needed. Bergin and García-Rodríguez (2020) estimate that 35,000 units a year will be required to meet housing demand.⁴ We will not reach this if the State continues its current approach, and each year the target is not reached the gap between supply and need grows wider.

1 Lima (2021) The Impact of the Pandemic on Services Oriented Towards Single Homeless Persons, Geary Institute <https://bit.ly/2SoJije>

2 See: ‘Focus on Homelessness Summary Edition 2014–21’, Focus Ireland (2021) <https://bit.ly/FIResearch21>

3 Dublin City Council 2021, Homeless Update No.16 <https://www.homelessdublin.ie/content/files/Homeless-Update-No-16.pdf>

4 [Regional demographics and structural housing demand at a county level \(esri.ie\)](https://www.esri.ie/publications/Regional-demographics-and-structural-housing-demand-at-a-county-level)

Focus Ireland has argued for a commitment to end homelessness in order to ensure that our ambition is to reduce homelessness to functional zero rather than accepting a level of homelessness as normal. We have welcomed the Cabinet decision to endorse the European Union Declaration on Combatting Homelessness⁵ with its ‘shared goal of ending homelessness.’ The 2022 budget will be the first where this commitment can be expressed in tangible programmes.

We have also made the case for a specific family homelessness strategy (or specific strand within overall strategy) to ensure that the specific needs of families experiencing homelessness are identified and addressed. The Government’s new housing policy ‘Housing for All’ is an opportunity to change the direction of current housing policy and to act with a renewed ambition towards ending the current homelessness crisis. A new Youth Homelessness policy is also long overdue. The Programme for Government’s commitment to a referendum on a right to housing is also a positive means of moving us forward, out of the current morass which is preventing us making decisive progress on tackling the housing crisis.

While successive budgets have increased the total expenditure on homelessness, our ‘Focus on Homelessness’ research⁶ shows that three-quarters of expenditure is on emergency/crisis ‘passive’ measures to provide immediate shelter, instead of ‘active’ measures to achieve long term, stable housing⁷. The proportion of expenditure on ‘active’ measures which alter the circumstances of the person who is homeless, has declined year on year. Focus Ireland has long advocated that preventing homelessness should be our priority and the solution to homelessness is homes, not emergency shelter. It is vital that we ensure our budgetary priorities are directed towards ‘active homeless measures’ (such as prevention and building public homes), while also ensuring that emergency accommodation is available to those in need.

5 Cabinet endorsed the EU Declaration on Combatting Homelessness on 15th June 2021

<https://bit.ly/2UccaMd>

6 Focus on Homelessness Special Edition Vol. 2 June 2020 <https://bit.ly/2UccaMd>

7 See discussion of ‘active’ and ‘passive’ homelessness measures in ‘7-years of homelessness spending – it’s time for change’ <https://bit.ly/FIResearch21>

Section 2: Policy recommendations requiring no budgetary allocation

Policy and practice recommendations to address homelessness efficiently and effectively	
COVID-19 protections	<ul style="list-style-type: none"> › Streamline the legislation underpinning the Covid-19 arrears legislation and review its operation. › Maintain access to Rent Supplement under current Covid-19 rules until the end of 2021.
Social housing	<ul style="list-style-type: none"> › Restore priority in allocating social housing for households who are homeless. › Include appropriate unit sizes in plans for new-build public homes to match household needs.
Emergency Accommodation	<ul style="list-style-type: none"> › Allow visits from family members in all emergency accommodation. › Prioritise households in emergency accommodation for over a year for intensive case management to facilitate exits out of homelessness.
Review initiatives on family homelessness and Family Hubs	<ul style="list-style-type: none"> › Clarify the objectives of Family Hubs, and before further public funds are committed, commission an independent review of provision for families who are homeless. › Include an 'acting in the best interests of accompanying children' requirement for Local Authorities into the Housing Act.
Housing First	<ul style="list-style-type: none"> › Permit greater local flexibility on use of 2 bed units for Housing First where no 1-beds are available. › Conduct feasibility review for pilot programmes applying Housing First principles and practice to young people and families who are homeless and have complex support needs.
Evidence-Informed Policy	<ul style="list-style-type: none"> › Collate and publish data on a wider definition of homelessness and 'housing insecurity' in line with FEANTSA's ETHOS Light framework.⁸ › Standardise the criteria for the monthly homeless figures, with a view to expanding and standardising the categories of homelessness that are included.
Homeless Students and Children	<ul style="list-style-type: none"> › Ensure that the issue of transitioning to independent living is addressed in school and youth service programmes, so that young people learn what is involved in leaving home and how they can plan towards it, as well as the nature and risks of homelessness and the assistance available. › Identify children who have experienced homelessness and are at risk of early school leaving for increased supports at school.

We are also joining other charities to ask for action to remove VAT from the cost of making a will if a charitable bequest is included in that will.

⁸ See: FEANTSA, ETHOS Light, European Typology for Homelessness and Housing Exclusion
<https://www.feantsa.org/en/toolkit/2005/04/01/ethos-typology-on-homelessness-and-housing-exclusion>

Section 3: Expenditure proposals

Department of Housing, Planning & Local Government

A. Overall housing supply

Covid-19 restrictions and shutdowns have been a serious setback for construction, though the prioritisation of social housing during this period, although restricted, was very welcome. While all elements of the housing system continue to face very serious challenges, the driver of rising homelessness continues to be the private rental market. As the DHPLG is aware, supply constraints, in the face of continuing high demand in the property market, is placing considerable pressure on the private rental market. The rental market is also the key driver of exits from homelessness. Of those who exited homelessness in 2021, approximately 75% entered the private rental market via HAP.⁹

Table 2.7: Breakdown of the Current Tenure

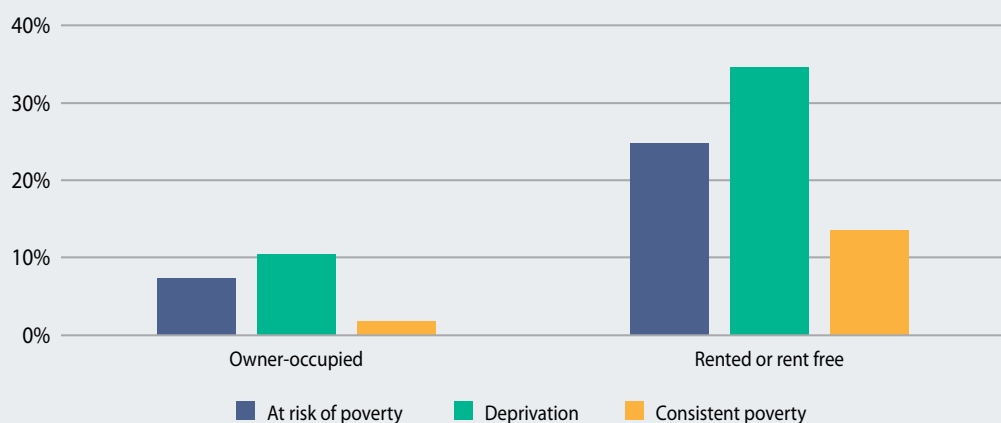
Breakdown of the Current Tenure	2019		2020		Change 2019/2020	
	No. of HH	%	No. of HH	%	No. of HH	%
Private rented accommodation (with and without Rent Supplement)	36,283	52.8	28,194	45.6	-8,089	-22.3
Living with Parents	14,773	21.5	14,825	24.0	52	0.4
Living with Relatives / Friends	6,131	8.9	6,431	10.4	300	4.9
Emergency Accommodation / none	5,834	8.5	6,188	10.0	354	6.1

Source: [gov.ie - Summary of Social Housing Assessments 2020 – Key Findings \(www.gov.ie\)](https://www.gov.ie/publications/documents/2020/summary-of-social-housing-assessments-2020-key-findings)

28,194 people on the Housing List in 2020 are currently living in private rented accommodation (with or without rent supplement). Beyond the official waiting list, a further 58,802 people are in HAP tenancies as of 2020. The number of households eligible for social housing which are being accommodated in private rental housing is increasing demand in urban areas particularly, pushing rents to unsustainable levels and pushing lower income households who are ineligible for social housing into serious deprivation and poverty. The chart below refers to 2019, but we know that the pandemic particularly affected renters and is highly likely to have worsened the outlook.

⁹ Focus on Homelessness Summary Edition June 2021 <https://bit.ly/FIRResearch21>

Figure 3.6 Poverty status and deprivation by household tenure status, 2019



Source: CSO Ireland

Source : CSO Survey on Income and Living Conditions 2019

Due in part to Covid-19 restrictions and shutdowns, we remain far from reaching the number of social housing units we need. In 2020, only 5,073 new build and 1,314 acquisitions and 1,440 leases were added to the social housing stock.¹⁰ This is in the context of the Social Housing Needs Assessment 2020 showing a total number of 61,880 qualified households, with 58,802 HAP tenancies.¹¹

The delivery of social housing continues to rely heavily on acquisitions and leasing with a consistently low level of new building. This is true of social housing delivered by both local authorities and AHBs. Acquisition by local authorities or AHBs had a role to play in the early stages of recovering from the financial crisis – it is much faster in meeting immediate need and allows for the purchase of turnkey properties. However, we have continued to rely too heavily and too long on this short-term approach, which does not add to the overall stock of accommodation in the country. This creates a scenario where the State is competing for the limited stock of housing which already exists (or is well on the way to existing) rather than bringing into existence new supply. This contributes to rising house prices, while simultaneously adding to pressure and rising rents via the HAP and Rent Supplement schemes. Local Authorities and larger AHBs are among the few entities in Ireland with the capacity to build substantial new housing stocks.

We now need policies which encourage them to divert their energies from harvesting housing which has already been built by speculative developers and towards generating a new and additional flow of built-for-purpose social housing. Moving to incentivising ‘additionality’ in the activities of local authorities and AHBs and breaking this cycle must be the urgent and immediate priority of the State as we rebuild after the pandemic.

As noted by the ESRI, ‘[w]hat is particularly clear from recent trends in the housing market is that the private sector, on its own, is struggling to meet current housing demands. Indeed, combining the forecast provision of State housing along with the overall forecast of 15,000 units indicates that private sector housing supply is likely to be less than 10,000 units for both this and next year.’¹²

¹⁰ gov.ie – Overall social housing provision (www.gov.ie)

¹¹ [SSHA-2020.pdf](https://www.housingagency.ie/SSHA-2020.pdf) ([housingagency.ie](https://www.housingagency.ie))

¹² [With ‘g’ greater than ‘r’, should we be borrowing to increase Irish housing supply?](https://www.esri.ie) ([esri.ie](https://www.esri.ie))

A whole-of-government approach, with a dedicated Delivery Unit devoted to the coordination of built-for-purpose social homes by the State, is required.

Overall housing supply

- › Increase capital investment to €4 billion in line with ESRI recommendations to build-for-purpose 18,000 additional social homes, overseen by a Delivery Unit within the DHPLG, working together with representatives from each local authority, DPER, the Department of Finance and the LDA.

Land Development Agency

The establishment of a legislative basis for the Land Development Agency (LDA) is a positive move towards properly utilising public land for development but the emphasis must be firmly on the delivery of new public homes. The LDA is an opportunity to ramp up the building of social homes and cost rental homes and government targets should reflect that. Much of the current focus of the debate on the LDA is on the ‘middle’ of the housing system, meaning the housing needs of households in the fourth, fifth and sixth deciles of income who do not qualify for social housing. However, the challenges faced by this section of society cannot be solved without at the same time solving the problems facing by households on lower incomes. It is, in part, the chronic dearth of social housing which is increasing pressure on the ability of low-income households to afford current house prices. This is due, both to the State’s continued acquisition of available accommodation for social housing, rather than building directly and to the operation of HAP.

An ambitious budget allocation to the LDA should be made to ensure that a maximum delivery of social housing and cost rental or affordable rental housing is secured. Housing should not be offered for sale because of an inadequate LDA budget, and should only take place on the basis of providing socially mixed communities or where existing structures are unsuitable for social or cost rental housing. All ‘affordable for sale’ property should be sold on an ‘ensuring affordability’ programme outlined below.

Land Development Agency

- › Increase the budget allocation to the LDA so that it has the resources to ensure that a minimum of 20% social, 20% cost rental and 60% ‘affordable for sale’ be provided on all LDA land.

‘Enduringly affordable’ owner-occupied housing

The current debate on ‘affordable housing for sale’ concentrates exclusively on the sale price when the unit is first completed. Focus Ireland recognises the importance of this debate and supports the view that for ‘affordable housing’ to be a meaningful concept which can retain confidence as a part of public policy, ‘affordability’ must be related to average income rather than to a discount against market rates. However, to date the debate on affordability has concentrated on the immediate short-term so that housing units are ‘affordable’ on initial sale but revert to full market rates at any subsequent sale. In this way the public investment in creating ‘first-sale affordability’ is captured by the first purchaser and no lasting stock of ‘affordable purchase’ homes is built up for future need.

We need to develop a concept of ‘enduringly affordable’ owner-occupied homes in which the public investment to achieve affordability at the first sale is retained as a public good for all subsequent sales. There are a number of mechanisms through which this could be achieved, including a hypothecated tax of gains at the time of sale or a ‘first option’ purchase rights to Local Authorities. Such mechanisms would have to ensure that the benefits of good maintenance and improvements are reflected in the payment received by the vendor, so that the rights of ownership are exactly the same as any other householder except in relation to the public investment in achieving an affordable first-purchase price.

Matching demographics to unit size

Despite its well documented limitations, the Social Housing Needs Assessment (SHNA) gives us some guidance to allow us to plan ahead for the type of households in need. To date, local authorities have been largely led by availability from private developers, which means that the unit type has generally been dictated by the private market. Local authorities should be planning housing by reference to the local Social Housing Needs Assessment, based on the need to ensure that appropriate stock is available to accommodate various household sizes. Where the market is not providing such units, the local authority needs to guide overall supply through its planning processes and also act directly by building for purpose. This is particularly noticeable in respect of 1-bed units for single adults and units large enough to accommodate larger families.

The growing requirement for 1-bed units is evident not only in the SHNA but in demographic projections for households of all incomes. Despite this, the DHPLG is only collecting data on the number of units constructed and not on the size of those units.¹³ It is unclear how we can meaningfully promote a policy of increasing 1-bed units without knowing how many are being built and where. This data must be collected centrally by the DHPLG and local authorities progress building 1-bed units should be monitored. This should be part of an overall upgrading of the quality and clarity of all housing and homelessness data.

One bed units and housing first

Reducing the numbers on the Social Housing Waiting List and increasing Housing First tenancies is dependent on the availability of appropriate-sized units. There are 34,906 adult-only households on the Housing List – over half – who require 1-bed units. Housing First is also dependent on the availability of 1-bed units and this limitation is the single biggest barrier to expansion of the highly effective Housing First response to homelessness.

Within the overall Programme for Government target of 50,000 social homes in five years, a specific target must be set for the building of 1-bed units. As the number of 1-bed units increase, Government housing policy must set out clear planning guidelines to ensure that 1-bed units are integrated among other sized dwellings, and not concentrated into blocks or onto floors (usually upper floors) of mixed blocks. For Housing First tenancies, while the supply of 1-bed units remains constrained, or non-existent, in some towns and localities, local authorities should be allowed to use their discretion, based on local knowledge of the housing market, to allow 2-bedroom units to be acquired for Housing First tenant in a limited number of cases.

¹³ [Housing Provision: 28 Apr 2021: Written answers \(KildareStreet.com\)](#)

Four bed units and larger households

There are currently 4,164 households with three or more children on the housing waiting list. These households will require larger units which must be considered as part of the overall social housing targets. The private rental market typically offers smaller units for rent, which means that larger families are doubly disadvantaged: firstly, by the smaller units available for social housing; and secondly, by the inaccessibility of a HAP tenancy as a means of exiting homelessness. As a result, larger families are at risk of becoming trapped in homelessness for significant periods of time. Figures from the Dublin Regional Homeless Executive demonstrate this, with nearly half of families in emergency accommodation for over one year:

Duration in EA	Total Families	%
24+ months	179	24%
18–24months	68	9%
12–18 months	112	15%
6–12 months	104	14%
6 months or less	279	38%
Total	742	100%

Source: DRHE January 2021, Monthly Report to Dublin City Councillors-Covid-19 and Homelessness

Particular effort is needed to move larger families out of homelessness. Rapid rehousing can be achieved for this cohort who are particularly vulnerable to spending long durations in homelessness by identifying a target of larger units to be built in each local authority area and prioritising homeless families first for allocations.

Unit size and Housing First

- › Ringfence funding for built-for-purpose social housing with 1-bed and four-bed plus homes in integrated communities to address needs of smaller households and larger families.

B. Expansion of Housing First

Housing First is a solution to homelessness which works, based on the simple idea of stabilising a person's living situation as the first step to addressing other needs, with multi-disciplinary support provided for as long as required to sustain the tenancy. Under the Housing First Implementation Plan (2018), the Housing First programme supports adult-only households with complex support needs, providing housing and intensive support. However, other people who are homeless also have complex support needs which would benefit from the intensive support and practices delivered through Housing First. The Housing First practice and approach should be expanded to particular groups with underlying vulnerabilities and complex needs in order to reduce their risk of long-term homelessness or recurring homelessness.

Housing First for Families

Ireland's Child Poverty rate is higher than the EU average. As a Member State with a rate of children at risk of poverty or social exclusion above the EU average of 23.4%, under the EU Child Guarantee Ireland is obliged to spend at least 5% of their European Social Funding allocation on actions that contribute to children's equal access to, amongst other things, decent housing¹⁴. This provides Ireland with an impetus, backed by funding, to launch a Housing First for Families programme.

The overwhelming majority of families that are homeless only require affordable housing and some short-term tenancy support to settle in. However, a small proportion of families, estimated to be around 10-15% of the families that become homeless, have complex support needs. Unlike individuals with complex needs who have a high risk of persistent, long-term homelessness, families with complex support needs have a risk of moving in and out of homelessness over long periods, with repetitive traumatising effects on children.

The aim of this Housing First for Families would be to target this group of vulnerable families, tackling child poverty and social exclusion by providing children with stable accommodation, along with adequate wrap-around supports (including dedicated child supports) to ensure the family, and each member of the family, is supported with any additional complex needs they may face.

Ireland will receive €451 million as part of the European Social Fund between 2021 and 2027. This means €22.5 million must be spent on programmes tackling child poverty. A small portion of this should be used to develop, implement and then evaluate a pilot 'Housing First for Families' programme to help 90 families with complex needs who have spent more than two years in homelessness (including in a Family Hub).

Housing First for Families

- Allocate €3.6m to develop, implement and evaluate a pilot 'Housing First for Families' response for 90 families around Ireland who have complex needs and have been homeless for more than two years.

14 See Children's Rights Alliance Q&A <https://bit.ly/3gCMaSR>

Housing First for Youth

Housing First for Youth provides young people with complex support needs with housing and support as quickly as possible to help them to make a permanent escape from homelessness. The young person is then provided with intensive and targeted, person-centred supports including healthcare, counselling, education, training, financial advice and more. These supports are crucial to helping the young person to move on to independent living and to avoid them becoming homeless again in the future. This approach recognises young people have particular needs distinct from the more general adult population. The European Housing First Hub has published evidence of the effectiveness of such programme for young people.¹⁵ Focus Ireland runs Housing First for Youth services in the South-East¹⁶ and Mid-West of the country, in close partnership with Tusla and the relevant local authorities in each area, and work with young people aged 18–26 who have experienced, or are at risk of, homelessness. The Housing First for Youth approach builds on the successful ‘CAS for Careleavers’ scheme operated by Tusla with the DHLGH, bringing in significant additional multi-disciplinary supports for the proportion of careleavers who have complex support needs and require such support.

A national Housing First for Youth pilot, which builds on the existing Housing First project and ‘CAS for Careleavers’, will contribute to a large reduction in both the current level of youth homelessness and prevent future homelessness among at risk young people. Focus Ireland believes that a Housing First for Youth national programme must form a central part of the ‘Housing for All’ Strategy and the soon to be developed strategy on youth homelessness.

Housing First for Youth

- › Avail of funding available under the ESF+ scheme to allocate €400,000 to a national Housing First for Youth project involving 60 young people, as part of the Youth Guarantee scheme.

15 Blood, Alden and Quiglars (2021) Rock Trusts Housing First For Youth Pilot <https://bit.ly/3j7g9C2>

16 Lawlor and Bowen, Just Economics (2017) Limerick Youth Housing Evaluation <https://bit.ly/FIRearch21>

C. Private rental sector

Housing Assistance Payment (HAP)

HAP remains the primary exit vehicle from homelessness, representing approximately 75% of exits. Despite the rise in market rents year on year, HAP rates have not increased since 2017. This means there is a widening gap between HAP rates and market rates, with tenants picking up the difference by way of ‘top-ups’. This gap falls on HAP tenants who, by definition, have very limited financial means. There is no data collection undertaken by the State to identify the scale of this problem, despite a commitment in the Programme for Government to a review of HAP levels.

Focus Ireland has examined the difference between market rents in each region against current HAP rates (Q1 2021). The table below outlines this difference for single adults, with average rents compared to both the flat HAP rate and the HAP rate plus additional 20% discretionary payment which local authorities may provide. Even where the 20% additional discretionary payment is paid, there is a sizeable shortfall for tenants. This shortfall is left to the tenant to pay, pushing them into poverty, into rent arrears, and putting them at risk of further homelessness. Furthermore, in Rent Pressure Zones, which now cover most of the country, landlords are permitted to an increase of rents by 4% per annum while the HAP payment is not increased automatically, so that each year the increase falls to the low-income tenant to cover.

Family of 1–2 adults with 1 child in 2-bed house					
Area	HAP limit, 1–2 adults with 1 child	HAP+20%	Daft.ie Average rent, 2-bed house (€)	Difference, HAP limit – Avg Rent	Difference: HAP+20% – Avg Rent
Cork City	900	1080	1246	–346	–166
Dublin City Centre	1250	1500	1879	–628.75	–378.75
Galway City	850	1020	1145	–295	–125
Limerick	650	780	777	–127	3
Waterford City	550	660	909	–359	–249

Source: Focus Ireland, based on data provided in DAFT Rental Index Q1 2021

For adult-only single households, the HAP rates have fallen so far below market rents that the programme is struggling to function fully as a method of prevention or exiting homelessness. Focus Ireland staff confirm that the challenges of finding a HAP tenancy within HAP rates for single people is enormous. Even with Homeless HAP (HHAP) in Dublin (where the additional uplift is 50%), the HHAP rate for single persons falls well below the average rent for a one-bedroom apartment (a gap of €616 between HHAP top rate and the average rent for a one-bedroom apartment).

Given the significant affordability gap for single adults seeking HAP tenancies, it is unsurprising that single adult homelessness continued to rise in spite of the protection measures introduced during the pandemic.

As noted by the ESRI, ‘increasing housing supply significantly will take time and there may therefore be a case in the interim for examining whether the current of system of housing supports for low-income private renters (e.g., Housing Assistance Payment and Rent Supplement) is adequate.’¹⁷ Rent supports are absolutely vital for younger people on a lower income and at risk of homelessness. To function, the rates must be related to the realities of market rents.

We are calling for an increase in the basic HAP rates to bring them in line with market rents. We are also calling for greater flexibility for local authorities to make additional discretionary payments where necessary. This mechanism would allow for maximum discretion to ensure HAP tenants are not left paying a top-up to a private landlord, alongside their differential rent payment to the local authorities. It would also avoid the risk of a perceived inflationary effect by avoiding setting in law a new floor for rental rates.

An additional budgetary allocation would be necessary to fund local authorities to meet the additional cost. EU Recovery and Resilience Fund should be used on the basis that low-income renters are at particular risk of losing their tenancies as a result of the impact of Covid-19. Protecting this population from homelessness is vital, particularly in the short term while supply in the housing market increases.

HAP

- › Provide increased funding of €20m to local authorities for discretionary top-up payments to ensure HAP payments reflect market rents.
- › Review current HAP rates and reliance on top-ups.
- › Implement a National Differential Rent scheme to improve financial incentives to be in paid employment.

¹⁷ [Intergenerational inequality \(esri.ie\)](#) page 37

Department of Employment Affairs & Social Protection

Youth unemployment and the risk of homelessness for young people

Those most vulnerable to being Not in Education, Employment, or Training or 'NEET' are those young people who are already marginalised. The Covid-19 crisis particularly affected youth employment.¹⁸ Many young people are also renters, leaving them very exposed to high rents. While the moratorium on evictions and legislative protections for those in rent arrears protected them in the short term from the effects of pandemic-related unemployment, we must be very alive to the risks this cohort face as we reopen in a changed economy.

With the Pandemic Unemployment Payment winding up, there is an opportunity to reconsider the adequacy of the baseline social welfare rate for young people and its impact on social exclusion. Research from Germany and Denmark finds that 'from a preventative perspective, the harsher policies aimed at the young equate to a high-risk strategy, which for the most marginal groups may actually increase the risk of social exclusion'.¹⁹ The reduced rate of social welfare for young people was introduced during the period of austerity following the global economic crisis. It was unclear whether this was a costs-driven austerity measure or whether there were intended policy objectives. In the many years since this decision, the Department has not published any evidence demonstrating any positive outcomes from this policy, while front-line services see the negative impact of the policy on a daily basis.

Currently, young people in emergency accommodation or who are sofa surfing or otherwise living outside the family home and not in receipt of State support are not eligible for the normal adult rate of Jobseeker's Allowance. While we fully support the higher rate for those who are unemployed and living independently, this only applies to young people who have been able to avail of State support schemes, meaning HAP, RAS, Rent Supplement or those in AHB accommodation. Recent research published by Focus Ireland shows that only 14% of young people exited homelessness into a HAP tenancy or into social housing/AHB accommodation.²⁰ This shows that independent living with the support of the State is rare for this age group, with 62% of young people departing emergency accommodation for a reason other than moving into secure accommodation.²¹ This means that vulnerable young people at risk of homelessness are not benefiting from available State housing supports and are not eligible for the higher rate of Jobseekers' Allowance. These young people are at risk of entrenched, long-term homelessness and social exclusion if we do not urgently give them the means to find employment, accommodation, and a stable life.

18 Darmody (2020), 'Implications of the COVID-19 Pandemic for Policy in Relation to Children and Young People' ESRI <https://www.esri.ie/node/8196>

19 Benjaminsen & Busch-Geertsema (2009) 'Labour Market Reforms and Homelessness in Denmark and Germany: Dilemmas and Consequences'. European Journal of Homelessness, p.144 https://pure.sfi.dk/ws/files/207207/feantsa_ejh2009_article_5.pdf

20 Insights into Youth Homelessness No 1 p.33 <https://bit.ly/FIResearch21>

21 Insights into Youth Homelessness No 1 p.31 <https://bit.ly/FIResearch21>

In the context of Budget 2022 and the Government's upcoming youth homelessness strategy, the supports provided to young people at risk of homelessness must be fully reviewed.

Youth unemployment

- › Extend eligibility for the higher rate of Jobseekers Allowance and Jobseekers Benefit to the 733 young people currently reliant on Emergency Accommodation at a cost of €3.4m annually.

Lone Family Payment

Lone parent families are still disproportionately represented among families who are homeless: while lone parent families comprise 23% of all families in Ireland, they represent 53% of families who are homeless. There are a number of factors contributing to this disproportionate number of lone parents in homeless accommodation, but the treatment of lone parents by the welfare system, and in particular its interaction with the labour market, is one of the policy areas where reform is needed.

Despite (and sometimes because of) reforms to social protection arrangements for lone parent families, lone parents are at greater risk of deprivation than other working-age adults.¹³ Lone parent families in Ireland experience very low rates of employment (36% in 2017)¹⁴, among the lowest in Europe. Focus Ireland welcomed the increase in the earned income disregard for lone parents to €165 in Budget 2020. In the absence of a significant and targeted increase in investment in the National Childcare Scheme (NCS) to address the reduction in childcare subsidies for low-income parents, a significant increase in the earned income disregard is needed to prevent lone parents being locked out of the labour market; Focus Ireland recommends that the disregard be increased from €165 to €200.

Lone Family Payment

- › Increase the earned income disregard from €165 to €200.

Working Family Payment

Research in Ireland shows that the absence of employment in a household is a key indicator of poverty and deprivation.²² The Working Family Payment (WFP) plays a vital role in making work pay in Ireland – in-work benefits are most effective in countries with high levels of wage dispersion, such as Ireland. In the context of the impact of Covid-19 on the labour market, the WFP – as a targeted payment to support employment for those whose earnings are not sufficient to meet their household's needs – has the potential to play an important role as the Temporary Wage Subsidy Scheme is wound down, and Focus Ireland recommends that the WFP forms an active part of considerations in that regard. At a minimum, we recommend an increase of at least €20 in the income limits used to calculate entitlement.

The WFP scheme rules make no provision to review entitlement if earnings are reduced during the 52-week period for which the payment is awarded. Given the impact of the pandemic on the labour market, and the need to support employment to the greatest extent possible, the rules for the scheme should be revised to allow anyone who has experienced a loss in earnings to have their entitlement reviewed and adjusted.

Further, employees may face reduced working hours as the labour market recovers from public health measures. A planned reduction in the working hours threshold to qualify for the Working Family Payment to 15 hours per week was not implemented by the last government but could play a valuable role in supporting low paid parents in a recovering economy.

Working Family Payment

- › Support employment for lone parents by extending eligibility for the Jobseekers Transition Payment until the youngest child reaches 18.
- › Review eligibility rules for SUSI maintenance grants to ensure lone parents are not excluded from training and education opportunities due to receipt of welfare payments.

²² See: Roantree, Maître, McTague, Privalko Economic & Social Research Institute, [Poverty, income inequality and living standards in Ireland \(esri.ie\)](#) p.25

Activation for people with a history of homelessness or young people at risk of homelessness

The unprecedented levels of unemployment experienced due to Covid-19 require an unprecedented response from the State to ensure that those of working age have access to decent employment as the economy reopens. It is hugely important that we learn from the mistakes of the recent past and ensure that we do not leave any group behind in a post-Covid recovery.

People with an experience of homelessness often experience barriers in the labour market and may even find it hard to access mainstream labour market measures. Focus Ireland's experience through the PETE (Preparation for Education, Training and Employment) programme shows that people exiting homelessness respond very positively to additional supports when re-entering the labour market.

In line with the integration objectives of a Housing First approach, PETE works with people who have moved out of homelessness and who now have housing stability. The PETE programme is tailored to the needs of each individual and provides flexible, wrap-around supports, to enable labour market inclusion for people. The current high demand for labour provides a unique opportunity for people who have been marginalised from the labour market if the right supports and programmes are put in place.

Labour market activation

- › Fund a pilot national partnership based on the current Focus Ireland PETE programme to support positive activation for people of all ages who are most distant from the labour market, including those with experiences of homelessness.

Activation for young people experiencing unemployment who are at risk of homelessness

The Youth Employment Initiative, which supports the EU Youth Guarantee, offers a very valuable opportunity to target young people who are NEET as the economy reopens. Focus Ireland runs a PETE programme in Waterford as part of our Housing First for Youth project where young people are supported to prepare for employment as part of a homelessness prevention strategy.

PETE aims to address a number of barriers to employment facing young people at risk of homelessness or who have experienced homelessness:

- No or low levels of qualifications.
- Disrupted education or employment histories: no work experience, intermittent employment.
- Low self-esteem and confidence, difficulty relating to others.

The Youth Employment Initiative, as part of the ESF+ funding post-Covid, provides an ideal source of funding to reach young people who are economically inactive and at risk of homelessness. Each member state must put together their national programmes for ESF+ funding. Given the impact which the current housing and homelessness crisis is having on young people in particular, there is a strong rationale for helping those most vulnerable to long-term unemployment through employment activation schemes aimed specifically at those most at risk of homelessness or who have already experienced homelessness.

Labour market activation for youth

- Fund a pilot national partnership employment supports initiative specifically aimed at young people at risk of homelessness or currently experiencing homelessness, which has the joint benefit of increasing their employment prospects and preventing their future homelessness.

Rent Supplement

The protective measures introduced to prevent mass evictions from the private rental sector as a result of the sharp rise in unemployment were a hugely effective policy response. The challenge, as we move out of the pandemic, is to avoid the risk of a cliff edge and to ensure that longer-term effects do not result in homelessness. Most people affected by the current economic downturn will not (it is hoped) have a long-term need: when the economy recovers, they will once again be able to meet their housing costs from their own resources. But assistance with housing costs will be important in supporting them while this recovery takes place. A revision of maximum rent limits for the Rent Supplement scheme has not taken place for many years, with the result that the rent caps are now significantly out of line with market rents. While the extension of the ban on evictions arising from Covid-related rent arrears is welcome, such bans only delay the impact of accumulated debt and are not a lasting solution to the problems faced. This should be remembered if any change is contemplated to the current Covid-related operation of the Rent Supplement scheme to ensure housing security for renters who are still affected by the pandemic-related changes to employment.

With this in mind, Focus Ireland believe that the current Covid-related protection measures for renters should be maintained through Budget 2022 and reviewed fully prior to any changes in Budget 2023.

This is particularly important given that renters are more likely to be at risk of poverty, deprivation or experiencing consistent poverty. The CSO's analysis of '*consistent poverty rates by tenure status shows that the rate for those living in owner-occupied dwellings was 1.8% compared with 13.5% for those living in renting accommodation*'.²³

Rent Supplement

- › Retain RS eligibility for tenants who have been renting for less than six months.
- › Extend RS eligibility to employees working longer than 30 hours and whose earnings have been reduced.
- › Retain immediate access to rent support to people fleeing domestic abuse on a permanent basis.
- › Align maximum rent limits with market rents, and review annually.

²³ [Poverty and Deprivation – CSO – Central Statistics Office](#)

Department of Children, Equality, Disability, Integration and Youth

The European Commission's new European Child Guarantee provides an opportunity and a framework to make targeted investments to improve the welfare of our most vulnerable children, as the Government has already acknowledged²⁴. Homeless children and children experiencing severe housing deprivation are a priority group within the Child Guarantee²⁵, with the provision of adequate and affordable family housing (including increased social housing) a key recommendation.

As of 2019, 8.1% of children - or around 100,000 children across Ireland - were living in consistent poverty, a situation which is unlikely to have improved during the Covid-19 pandemic²⁶. Given Ireland's high level of child poverty and family homelessness, the funding available through the ESF+ to support the implementation of the Child Guarantee can make meaningful strides towards eradicating child poverty and child homelessness.

Child Support Workers

Focus Ireland services (in partnership with DRHE and other local authorities) are the largest provider of specialist support for families and children experiencing homelessness. Each Focus Ireland team includes a specialised, trained child support. Some children need this support to cope with the trauma of homelessness, either as a result of challenges they were facing before becoming homeless, or as a result of being homeless, or both. Not only do our Child Support Workers help to address some of the detrimental impacts of homelessness, by extension, they help to reduce the pressure and stress on parents. This enables parents to engage much more fully both with supporting their children through a traumatic experience, as well as on the process of exiting homelessness.

The Child Support Workers posts in the Focus Ireland family teams are currently funded by HSE Social Inclusion, Tusla, local authorities or public donations, but there are insufficient posts for the children that need them. There are a significant number of children with assessed needs who cannot be allocated a Child Support Worker. Each Child Support Worker has a case load of about 20 children. Four additional workers, at an estimated cost of €280,000, could support over 100 vulnerable children per year. The best approach to the deployment of these workers should be considered in a review of family homeless services, as recommended above and by the Ombudsman for Children in *No Place Like Home*.

Child Support Workers

- Allocate funding for four additional Child Support Workers in Tusla, to support over 100 vulnerable children per year.

24 'Ireland to 'sharpen' focus on child poverty in line with EU scheme'

<https://www.irishexaminer.com/news/arid-40297355.html>

25 See Section 2.2 of the Commission Staff Working Document accompanying the document Proposal for a Council Recommendation establishing a European Child Guarantee (2021), available here:

<https://ec.europa.eu/social/main.jsp?langId=en&catId=89&furtherNews=yes&newsId=9968#navItem-2>

26 CSO 2019 figures: <https://www.thejournal.ie/cso-disposable-income-5246093-Oct2020/>

Family mediation for young adults at risk of homelessness

Family breakdown is a significant driver of youth homelessness among both older minors and young adults. In appropriate instances, skilled family mediators can intervene to resolve the issues that caused the break, support reconciliation, and prevent or end a young person's homelessness.

Focus Ireland operates two forms of 'family mediation' service with Tusla, one designed for families where relationship issues are likely to result in a young person becoming homeless and the second for families where the relationship has temporarily broken down and a young person is accessing homeless services. The programmes work intensively with a small number of extremely vulnerable young people (in most cases under-18s) and their families and/or carers with the aim of preventing admissions to care or crisis admissions to homeless services.

A major longitudinal study into youth homelessness in Ireland²⁷ commissioned by Focus Ireland recommended the establishment of a family mediation service to prevent and address such cases of youth homelessness, leading to the establishment of Focus Ireland's current service with Tusla. More recently, the first major study into LGBTQI+ youth homelessness in Ireland found that family rejection after coming out was a major cause of LGBTQI+ youth homelessness and identified mediation as a solution: 'As an immediate step, Tusla should increase funding to extend the lifetime of the existing Youth Homeless Prevention Mediation Service.'²⁸

The effectiveness of this service can mean that a child often does not have to be taken into care, resulting in a considerable financial saving to the State and avoiding the long-term consequences of experiencing homelessness at a young age. The social and financial benefits of this service are so clear that it should be rolled out to other vulnerable young people outside of Dublin as soon as possible.

Family mediation services

- › Resource three additional Family Mediators for Cork, Limerick and Waterford, at an estimated annual cost of €190,000.

27 Mayock et al (2014) Young People, Homelessness and Housing Exclusion. Dublin: Focus Ireland. p.183
<https://bit.ly/FIResearch21>

28 LGBTQI+ Youth research, p.118
<https://bit.ly/FIResearch21>

Domestic violence

Domestic or family violence was the declared cause of homelessness for 6% of families in emergency accommodation and may be a contributing factor in a larger proportion of cases²⁹.

Domestic violence has increased significantly during Covid-19 containment measures, with Women's Aid receiving 43% more calls in 2020 than in the previous year. At the same time, due to social distancing requirements the already low number of refuge spaces has fallen by 25% during the pandemic³⁰. Ireland is committed to developing a plan to expand the number of refuge places and to ensure geographical coverage — implementation of this is urgently needed.

A core element of this plan needs to be a much more integrated response to homelessness and domestic violence – currently, women in refuges may not be receiving the same accommodation supports as they would in homeless services, while women living in homeless services may not be receiving adequate care and support in addressing the domestic violence they have experienced. It is critical that every person experiencing violence and abuse in their home knows that they will be able to find safe accommodation.

Domestic violence

- › Resource a planned expansion of domestic violence refuge spaces, in line with Istanbul Convention requirements.
- › Resource a domestic violence homelessness taskforce to include cross-departmental decision-making capacity with the Departments of Housing and Children.

29 Long et al (2019) 'Family Homelessness in Dublin: Causes, Housing Histories, and Finding a Home'. Insights into Family Homelessness. Series 2019 | Vol.2 No.1. <https://www.focusireland.ie/resourcehub/research/>

30 https://www.womensaid.ie/assets/files/pdf/womens_aid_when_home_is_not_safe_covid-19_supplement_-_embargoed_20820.pdf

Youth Key Workers

The Government's commitment to a new Youth Homelessness Strategy is extremely welcome, given the specific challenges facing young people experiencing homelessness. Given the evidence that those most affected by Covid-19 related job losses are predominantly young workers³¹ and that this cohort is also the most likely to live in overcrowded and unstable rented accommodation³², increased provisions for young people at risk of, or experiencing, homelessness are urgently needed.

One of the most significant contributors to ongoing or prolonged homelessness among young people is the lack of youth-specific services. Young people who have no choice but to enter general adult services are extremely vulnerable, and research has shown that 'substance use and criminal activity, invariably intensified subsequent to young people's first contact with the homeless service system and, in particular, following their entry to adult systems of intervention'. In contrast, those who had accessed supported temporary accommodation for young people reported access to support, re-engagement with education or training, and the ability to form trusting relationships with staff, particularly key workers.

Given the risks faced by young people who are homeless or at risk of homelessness, it is critically important that they can access prevention and support services designed to meet their needs in their local communities. Children & Young People's Services Committees are an appropriate structure through which to coordinate such support, but it is important that services are adequately resourced to be able to meet these needs.

Youth Key Workers

- › Resource Tusla to provide key workers for vulnerable young adults who are homeless and ensure that they can access the range of youth oriented and community-based services they need, through Children and Young People's Services Committees.

31 See: <https://www.gov.ie/en/press-release/97112d-minister-doherty-announces-the-publication-of-a-working-paper-on-the/>

32 See: <https://www.ihrec.ie/app/uploads/2018/06/Discrimination-and-Inequality-in-Housing-in-Ireland..pdf>

Aftercare

It is well established from national and international research that care experienced young people are at an increased risk of homelessness on reaching adulthood. Planning and resourcing Aftercare can play a critical role in helping vulnerable young people avoid homelessness and establish independent lives. In this context, the government has made a welcome commitment to ensuring that every young person leaving State care who needs an aftercare worker should be allocated one.

However, in order to reach this laudable goal, the caseload of Aftercare workers in some areas has been increased to a level where it is not possible to provide meaningful Aftercare support, particularly to those young people with complex needs who are most vulnerable to homelessness. Focus Ireland aims to maintain a caseload of 15–20 young people per Aftercare worker, in line with international best practice. However, funding constraints have forced us to operate a case load of 22–25, and there is currently a waiting list for Support & Settlement Aftercare Workers. In Aftercare services run directly by Tusla, a caseload of up to 50 young people per Aftercare worker is not uncommon. This is a false economy. Vulnerable young people leaving care need meaningful Aftercare support to realise a sustainable and independent life. In the absence of such support, the risks of a life of social exclusion, with associated costs, are high.

Aftercare

- › Resource Tusla to increase the number of aftercare workers to a ratio of one for every 20 young people.

CAS for careleavers (see also Housing First for Youth above)

The ‘CAS for Careleavers’ programme, operated by Tusla, for purchasing appropriate apartments for young people leaving care is one of the most successful Government initiatives in recent years, and will over time build up a significant stock of housing ring-fenced for young vulnerable care-leavers. A number of changes were identified in the recent internal review of the scheme by Michelle Norris, Professor of the Social Policy at UCD and these should be implemented urgently to secure the continued success of the programme. Given the fact that the programme, correctly, offers young people an indefinite tenancy agreement on the properties a new supply of housing will continue to be required for several years, until vacancies begin to emerge due to normal household development. Capital funding for CAS for Careleavers should be continued at present levels for at least 5 years, before a further review.

Department of Health

Invest in health-related homeless services

Under Section 54 of the Health Act, 1953, the Department of Health/HSE continue to have joint responsibility (along with the Department of Housing, Local Government and Heritage/Local Authorities) for responding to homelessness. Despite this, the proportion of homeless services funded by the HSE has fallen significantly over the last decade – partly due to substantial cuts in HSE funding to homeless services during the austerity period and partly due to the increase in Department of Housing Section 10 funding in response to the quadrupling of homelessness from 2014 onwards. This reduced HSE funding of homeless services has not just created general funding pressures in the sector but has shifted supports away from care and case management approaches and towards ‘shelter only’ provision.

This disengagement of the HSE from homeless provision has been reversed to a significant extent in recent years, firstly through a new commitment to funding Housing First services and more recently due to the impact of the Covid-19 pandemic. Despite this welcome commitment, the legacy of HSE underfunding of services during the period of rapidly rising homelessness means that front-line services are repeatedly told by local authorities that they will not continue to fund particular staff posts and that the service should seek payment from the HSE. Such funding disputes should not be delegated to the front-line but should be addressed in a coherent and integrated strategy at Government level. It is now timely to consolidate this new financial commitment in the context of an all-Government strategy to move towards ending homelessness.

The link between adequate housing and public health has become clearer than ever during the Covid-19 pandemic. The adaptation of services over this period to include more in-reach health services for those in homeless accommodation and the high level of cooperation across Government departments, local authorities and homeless services is very welcome and must continue. This depends on clear and well-resourced funding streams into the future.

Dr. Austin O’Carroll’s interim report on deaths in homelessness contains a number of recommendations for homeless health services which should be implemented as soon as possible³³. Homeless people living in Private Emergency Accommodation (PEA) have had in-reach access to addiction, nursing and mental health workers during the Covid-19 pandemic, provided by the HSE. For as long as these ‘shelter-and-food’ PEAs continued to be used, this should be maintained as a core service.

Health services for homeless people

- › Agree at Cabinet level which aspects of homeless services are to be funded by the HSE (Social Inclusion) and which by the DHPLG Section 10 funding, and provide adequate funding accordingly.
- › Maintain the provision of in-reach addiction, nursing and mental health services as a core service for homeless accommodation.

33 See: Interim Report on Mortality in Single Homeless Population 2020 <https://www.homelessdublin.ie/content/files/Interim-Report-on-Mortality-in-Single-Homeless-Population-2020-Dr-Austin-OCarroll.pdf>

Mental health

Mental health supports play a critically important role in preventing and addressing homelessness: poor mental health can result in homelessness, while failure to provide for mental health needs can undermine the impact of housing supports. We would welcome stronger collaboration across mental health and homeless services but this is only possible in the context of adequate budgetary provision.

The 2020 implementation plan of the current mental health strategy, Connecting for Life, identifies the homeless population as a priority group for increased access to mental health services: 'Assertive outreach teams should be expanded so that specialist mental healthcare is accessible to people experiencing homelessness. Further, Domain 3 Social Inclusion provides for additional housing support for those with mental health difficulties.'³⁴

Mental health

- › Establish an outreach mental health team to engage with homeless people through emergency accommodation, rough sleeping and day services with secure funding.

Youth mental health

Poor mental health can be both a cause and effect of homelessness for young people. It is also a significant factor in inhibiting successful transitions into a secure home and independent living. Ensuring that vulnerable young people can access the support they need to address mental health needs, and develop resilience, is therefore an important component of tackling homelessness among young people.

Waiting times for mental health appointments are at present extremely long, which exacerbates the issues at hand and discourages many from seeking appointments before their situation is at an advanced level of crisis. Under Sláintecare, waiting times for a first appointment should be no longer than 10 weeks³⁵. This requires urgent investing in recruitment and retention of mental health staff.

Youth mental health

- › Increase the HSE Social Inclusion budget by €1 million to provide mental health nurses for youth homelessness programmes and children in homeless accommodation.
- › Provide adequate funding and resources to decrease waiting times for a first appointment to a maximum of 10 weeks.

34 See: <https://www.hse.ie/eng/services/list/4/mental-health-services/connecting-for-life/publications/cfl-implementation-plan-dec-2020.pdf>

35 See: <https://www.oireachtas.ie/parliament/media/committees/futureofhealthcare/Oireachtas-Committee-on-the-Future-of-Healthcare-Slaintecare-Report-300517.pdf>.

Children's mental health

Children and young people experiencing homelessness are struggling to access mental health supports, a problem which is likely to have increased as a result of the Covid-19 pandemic. The Mental Health Commission has pointed to the use of emergency departments by children and young people with mental health difficulties, as well as the presence of children in adult inpatient units due, in part to the lack of out-of-hours service and the low number of CAMHS units nationally.³⁶ Mental Health Reform has argued for the need to develop 7/7 crisis intervention mental health services for children and young people in every community across the country.³⁷ Significant investment and a new strategy for recruiting an adequate level of staff is clearly required for CAMHS. Focus Ireland also believes that funding for multi-disciplinary teams within homeless services, including those with expertise working with children and young people experiencing mental health difficulties, is urgently needed.

The decision to maintain all aspects of the mental health service under the HSE has resulted in a lack of integration between the children's/youth mental health service CAMHS and other children's/youth services. While transferring CAMHS to Tusla would have some clear benefits, it would also have some detrimental impacts in undermining a consistent approach to mental health across all ages. Many of the problems which are discussed as arising from 'lack of integration with children/youth services' in fact arise due to massive and prolonged underfunding of CAMHS. It is not clear that moving a chronically underfunded service from one agency to another where it will continue to struggle for funds will solve the underlying issues. Focus Ireland recommends increasing funding to CAMHS to an adequate level and only then undertaking a review of where it should be best situated.

Children's mental health

- › Increase funding for CAMHS by €10 million to recruit and roll out provision of out-of-hours services.
- › Develop out-of-hours crisis intervention mental health services for children and young people across the country.

³⁶ See: Mental Health Commission Annual Report 2019 [MHCAAnnualReport_2019.pdf](#) ([mhcir.ie](#))

³⁷ See: Mental Health Reform PBS 2020 [Full-MHR-pre-budget-submission-2020_-FINAL-1.pdf](#) ([mentalhealthreform.ie](#))



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