

FOCUS Ireland

Recommendations to Government: Housing for All Strategy 2021 Adult Only Households

May 2021

Proposals on Adult-only homeless households

Introduction

People who are homeless without accompanying children are typically referred to, both in data and practice, as 'single homeless people'. However, this tends to obscure the fact that a significant, and apparently growing, number of such people regard themselves as being part of a 'couple'. The more accurate title for this group is 'adult-only households' and this term is generally used in this submission to refer to this wider group, while the term 'single' is used to refer to individuals¹.

While the total number of people who are homeless started to decline over 12 months ago, and declined more rapidly during the pandemic, this decline has been exclusively in family homelessness and has masked the continued growth in homelessness among adult-only households. Most of this increase has taken place in Dublin and neighbouring counties, and the growth is primarily in male homelessness². The level of homelessness in adult-only households in Dublin is now at a historically high level.

The most significant response to homelessness in adult-only households has been Housing First, as set out in the Housing First National Implementation Plan and subsequent roll-out of contracts across the country. The adoption of Housing First at this scale has been one of the most positive developments during Rebuilding Ireland in relation to homelessness and is one of the factors (along with substantial increases in shelter provision) for the decrease in rough sleeping over the last number of years. However, it is clear that the scale of our response remains insufficient to the scale of the problem: at the time of the launch of the National Implementation Plan in 2018, there were 214 Housing First tenancies in Dublin and 2,500 emergency homeless bed for single people. At the end of 2020, the number of Housing First tenancies had grown by almost 130 while the number of people in homeless shelter beds had grown by over 500 - to an unprecedented total of 3,000.

This problem will not be solved by giving existing policies more time, nor by marginally adjusting the targets on the existing programmes. A more fundamental shift in approach is needed.

As in all other aspects of homelessness, Focus Ireland argues that any set of policy measures needs to be organised around the objective of ending homelessness and a long-term approach to do so. The importance of such an organising principal and the approaches to arriving at a shared long-term plan to achieve it are set out elsewhere in this submission.

This section of the submission sets out some of the key elements which Focus Ireland believes should be included in that response.

Workstream 1: Prevention of homelessness.

Workstream 2: Ensuring rapid exits from homelessness to secure housing.

Workstream 3: Reducing the harm done by a period of homelessness.

Workstream 4: Housing Supply.

Workstream 5: Evidence and evaluation.

¹ This is part of a wider debate on how homelessness is best measured, which is discussed under the 'Evidence and Evaluation' section below.

² Focus on Homelessness Vol: 4 'Adult-only Households' <http://bit.ly/FoHADultOnly>

Workstream 1: Prevention of homelessness

While the trajectories through which families become homeless have been the subject of significant research, firstly by Focus Ireland³ and subsequently by the DRHE⁴, there has been remarkably little exploration in Ireland into the factors leading to homelessness among single people and couples without children. This is despite the large number of single people who become homeless every day – for instance, with 4.5 single people becoming newly homeless in Dublin for every day of the pandemic⁵ it is remarkable that we have virtually no reliable information on what events pushed them into homelessness.

The most immediate and compelling requirement for an effective strategy to prevent the continued flow into homelessness must be to better understand the current routes into homelessness so that we can then consider how they might be blocked.

How this gap can be filled is discussed in more detail under Workstream 5 below, but, in the absence of such reliable data, a few observations can be put forward on the basis of international evidence and front-line experience.

In the first place, the routes into homelessness for single people appear to be more complex and varied than for families. It would appear that, while eviction from a private rental tenancy is the main route into homelessness for families, it is less common for single people. Relationship breakdown, either where a former partner retains an existing tenancy or where there was no formal tenancy arrangement (sofa-surfing, doubling up etc) appears to be more prevalent. In addition, there are more frequent cases of homelessness arising from discharge from long-term institutions – prisons, psychiatric institutions or special care. Some evidence of these patterns can be ascertained from the continued rise in single persons homelessness during the pandemic, where, in contrast to the case of families, the pandemic-related eviction embargos did not reduce the inflow into homelessness⁶.

Advice and Information:

To date Government strategies on preventative Advice and Information have concentrated heavily on tenancy rights for people in private rented accommodation. This approach, with advice provided by Threshold and also by Focus Ireland, has had notable successes for families and for some single people, but, as noted above, is not relevant for a large proportion of single people facing homelessness as they had no tenancy (and no rights) to be defended.

For these individuals, the advice services, which use a case management model delivered by Focus Ireland in Dublin and on behalf of a number of local authorities across the country, are more relevant. These services which respond to the needs of people with complex needs are under

³ Long et al., 2019. Family Homelessness in Dublin: Causes, Housing Histories, and Finding a Home. <http://bit.ly/Trajectories2019>

⁴ Gambi and Sheridan, 2020. Family Homelessness in Ireland: The Importance of Research Design in Evidence-Based Policymaking. European Journal of Homelessness Vo. 14 <https://bit.ly/2R1fipd>

⁵ Dublin City Council (2021) Report to the Housing SPC 'Report/Update on Covid-19 and Homelessness- December 2020.'

⁶ 'Single adult homelessness continues to rise despite pandemic decreases' (2020) Focus Ireland Blog <https://bit.ly/3sslPFV>

resourced and there is need for greater awareness among target groups. As well as maintaining the ‘tenancy rights based’ services, there is a need to develop a well-resourced case-management strand to homeless prevention advice for non-tenants at risk of homelessness. This should be a key part of the Housing for All strategy.

Systems Prevention.

International experts on homelessness prevention⁷ highlight the importance of what they call ‘systems prevention’, which is defined as ‘addressing institutional and systems failures that either indirectly or directly contribute to the risk of homelessness. In some cases, policies and procedures are designed in ways that undermine the ability of individuals to get access to needed supports that would stabilize their housing. In other cases, the lack of planning and supports for individuals transitioning from public systems (e.g., hospital, corrections, child protection) can produce a higher risk of homelessness.’ While predating this typology, the National Homelessness Prevention Strategy⁸ (2002) deals in detail with a number of these issues in an Irish context and a number of the key issues it seeks to resolve (e.g. whether the Prison service should maintain a small housing stock for releases prisoners) remain relevant today⁹. There is good reason to believe that these systemic routes into homelessness and the ‘institutional circuit’¹⁰ that they create are a very significant contribution to single person’s homelessness in Ireland.

While the inter-institutional and inter-agency responses to these challenges are difficult to align, they differ from other causes of homelessness in that a very significant part of the solution lies directly in the hands of the state, if it is able to mobilise the engagement of the relevant stakeholders. This highlights the central importance of an ‘all-Government approach’ and the need to attain the level of cross-departmental engagement which was previously achieved at the start of the century, but was lost due to the overwhelming demands of the Global Economic Crisis.

While the approaches set out in the 2002 document may not be the precise choices that would be adopted today, the challenges that it sets out in each of the institutional domains remain relevant. ‘Housing for All’ should revisit the key recommendations in the 2002 document and set out the contemporary solutions to the challenges it identifies. The process of engaging the relevant state agencies and Department may take longer than the timeline for drafting ‘Housing for All’, so that it might be more productive to set out a time-limited process to achieve this within 12 months of the publication of the overall strategy.

Multi-disciplinary practice (or Housing First approaches) as a prevention measure

In the Irish context, Housing First has largely been adopted as a programme to support people whose complex support needs are evidenced by the long period during which they have been homeless. In a number of jurisdictions, Housing First (or housing first methodologies without the label) have been applied as measures to prevent people who have support needs that are likely to result in them becoming chronically homeless from having to go down that path. This approach is

⁷ Dej and Gaetz (2017). A New Direction: A Framework for Homelessness Prevention <https://bit.ly/3uqxN81>

⁸ National Homelessness Prevention Strategy (2002) <https://bit.ly/3tX72sj>

⁹ Maher and Allen (2014) What is Preventing us from Preventing Homelessness? A Review of the Irish National Preventative Strategy, European Journal of Homelessness <https://bit.ly/3vnJJbb>

¹⁰ Daly, Craig and O’Sullivan. (2018) The Institutional Circuit: Single Homelessness in Ireland, European Journal of Homelessness 12(2) pp.79-94.

referred to in the Housing First National Implementation Plan in relation to prisons and psychiatric institutions, but to date has not been developed in a systematic way.

There is considerable experience of trying to prevent homelessness among prisoners on discharge. While there have been significant developments in the prison system since, an evaluation of such systems by Focus Ireland, with the support of the Irish Prison Service, continues to have some relevance¹¹. More recently, the positive experience of the Outlook programme for female prisoners, provided to the Irish Prison Service in partnership with the Probation Service, demonstrates a number of important service and practice innovations.¹² While there are well understood limitations to the self-reported data, the number of prison committals where the prisoner declared themselves to be homeless (or of no fixed abode) has increased significantly in recent years, from 265 committals in 2014 (231 males and 34 females) to 505 in 2019 (444 males and 61 females).¹³ This indicates the increased importance of this route into homelessness – and the need to address it.

Similarly, there is now a significant body of work in relation to discharge of people with no fixed abode from psychiatric institutions, but this has not been brought together in a coherent national plan. The problem is significant. For instance, HSE Mental Health Services in Dublin North City and County (DNCC) conducted housing audits over the 18 months up to May 2020 showed a large number of DNCC service users (n=385) had a housing need which included people who are homeless (n=145), people living in the family home where it was no longer appropriate (n=112) (24 of these with elderly parents) or are living in inappropriate private rented accommodation (n=39). Similarly, across the country, audits have consistently displayed that discharge is frequently delayed due to lack of appropriate accommodation, which includes independent accommodation or a six-month secure homeless bed. Funding by Genio in this area has been shown to be effective in a range of innovations, but the funding approach has been to see these issues as short-term issues relating to a cohort of people who can be helped by a time-limited intervention rather than seeing this as an ongoing issue directing a constant stream of vulnerable people into homelessness.

A Focus Ireland collaboration with Tipperary County Council and the HSE Mid-West Community Healthcare was last year presented with an award for innovation, and provides a strong model for effective interagency collaboration to tackle this issue.¹⁴ If 'Housing For All' is able to pull together the extensive good practice experience in this area together into a coherent and sustained strategic approach, it would result in a lasting and significant decrease in the level of homelessness.

Tenancy Sustainment and ensuing no return to homelessness.

Supporting people who have exited homelessness from returning to homelessness is a critical element of a prevention strategy. Existing programmes such as SLI and TSS are important in this and must be continued. Equally, further investigation of the problems encountered by the 10-20% who are unable to sustain a tenancy under Housing First is needed. There are a number of different models being developed in Canada and elsewhere to explore supported housing models which work for this group and these should be piloted in the Irish context.

¹¹ Sarma (2014) Evaluation of the Cork Prison In-Reach Pilot Project <https://bit.ly/2R9vY12>

¹² A review of the first year of this project has been prepared by Focus Ireland and the Irish Prison Service and is awaiting a publication date.

¹³ Focus on Homelessness Vol: 4 'Adult-only Households' p.14 <http://bit.ly/FoHAdultOnly>

¹⁴ Dowling (2020). An Evaluation of the North Tipperary Intensive Tenancy Sustainment Service <https://bit.ly/3xDLX8g>

Focus Ireland has been providing long-term tenancies for people moving out of homelessness for over 30 years. The model provides housing units where case managers are either available on-site (Supported housing) or as floating support (Off-site housing) to provide tenancy support as required to sustain independent living. These models of housing have a very high success rate for people with intense or intermittent support needs, and have been evaluated on a number of occasions¹⁵.

With the passing of time, the average age of the tenants in these homes is getting higher and there are now a number of older residents who experienced homelessness many years ago. As is well documented, people with an experience of chronic homelessness can experience the effects of ageing at an earlier chronological age than the mainstream population. Many of these tenants now have growing support needs which are outside the normal 'tenancy sustainment' support provided by Focus Ireland, however because they are living in a form of supported housing they often find it difficult to access the HSE care packages which would normally be available.

We understand that this issue of a cohort of ageing tenants with deepening support needs is experienced by a number of similar AHBs. It is important that the new strategy notes this emerging issue and puts in place a process to plan appropriate policies and funding supports in good time.

Workstream 2: Exits from homelessness.

One of the least remarked upon 'record-breaking' features of recent responses to homelessness has been the unprecedented number of households who are exiting homelessness to long-term tenancies, accounting for over 1,000 individuals without accompanying children in Dublin in 2020. This is almost double the exit rate for 2019 (575) and nearly triple the 2018 outcome (395).

The supports to assist people out of homelessness appear to be extraordinarily effective and one reasonable conclusion would be that if we could just slow down the rate at which people are becoming homeless, we would soon see very rapid declines in the level of homelessness. There is considerable merit in this approach, which reinforces the argument that a dominant feature of the homeless chapters of 'Housing for All' must be a shift to prevention.

Nevertheless, there are a number of ways in which interventions to support exits can be improved.

First, it might well be that the success in supporting exits from homelessness is, to a significant extent, a consequence of our failure at prevention. Research into pathways through homelessness indicate that a large proportion of people who become homeless use homeless services for only a few nights and do not contact homeless services again. Given the shortage of housing supply in Ireland at present, a large number of households is likely to be becoming homeless primarily for economic reasons, increasing the proportion of homeless households that are able to exit homelessness quickly with little case management support - though Homeless HAP is likely to be a significant assistance for this group. The risk in this situation is that people with more complex needs, who cannot get out of homelessness quickly, are likely to become trapped in homelessness for longer – with all the deleterious effects that this is known to have. This analysis is supported by the fact that, along with the phenomenal increase in exits from homelessness, the proportion of homeless households which have been homeless for over 6 months is increasing. In short, people with more complex support needs are falling into long-term homelessness in larger numbers, and

¹⁵ Bevan, Jones and Pleace (2015) 'Service Evaluation of Focus Ireland Long-Term Supported Housing: Review of Congregate and Clustered Housing' <https://bit.ly/3xNAu6n>

we need to ensure that measures to support exits from homelessness are more effectively targeted on those who need them most.

Expansion and deepening of Housing First.

Focus Ireland welcomes the commitment in the Programme for Government to further expand the Housing First programme. This extension of the programme should consist not only in an increased target for participants but must draw on the now extensive experience across the country on the barriers and opportunities to successful tenancies.

In a number of local authority areas, the Housing First programme has been made possible due to part funding from the Service Reform Fund. This funding is by definition time-limited creating a degree of uncertainty about the future of a supports which are intended to be provided for as long as they are needed. To further develop and expand the programme, clear and reliable long-term mainstream budgets need to be put in place for all aspects of the programme.

In the first phase of roll out of Housing First, the target group prioritised people who were sleeping rough and were long-term residents in emergency accommodation. A similar target was established in the National Implementation Plan including locally determined assessments of risk, complex support need and patterns of engagement with health and homeless services. In many areas there remain many individuals who fall into these categories so that there is scope for increased targets within the same target group.

However, there is also scope to explore access to Housing First supports for other people with complex support needs who do not necessarily fall into these criteria. As noted above, Housing First can be used as a measure to prevent long-term homelessness as well as a route out for those who are already homeless for long periods. Such group could include: released prisoners with complex support needs and no home to return to, psychiatric patients with on-going complex support needs and no home to return to, families with high and complex support needs, young adults with high support needs. The European Housing First Hub has drawn attention to the capacity of EU programmes to support de-institutionalisation to fund elements of such programmes.

While the high intensity of support available to Housing First participants is not needed by a large proportion of the people who are experiencing homeless, many other practices and principles of Housing First would have very positive impacts if extended across the entire housing and homelessness system. The achievements of Finland in bringing about significant and lasting reductions in all forms of homelessness can be understood as arising from a decision to implement Housing First not as 'one-programme-amongst-many' but as a systemic approach underpinning all aspects of its housing and homeless system as it relates to vulnerable groups.

Such a transition is not easily achieved, but within an overarching goal of 'ending homelessness' over a sustained period, such a transition could valuably be signalled in 'Housing for All'.

Local connection

Focus Ireland supports the recent submission by the Dublin Homelessness Network to the Department of Housing, Local Government and Heritage in relation to the 'Local Connection' rule and its application by local authorities, and believes that 'Housing for All' is an appropriate place to set out a road map for reform in this area.

In the first place, Focus Ireland, in common with most independent legal opinion, believes the local connection provisions should be read in relation to access to social housing list and that local authorities are wrong to use this rule in relation to access to emergency accommodation.

Nevertheless, the persistence of this disagreement and the enormous harm it has done over many years, suggest that a review of the legislation to establish clearer personal rights and local authority obligations is long overdue. The ‘local connection’ rule is essentially a mechanism to apportion responsibility and cost within the local government system and should be abolished and replaced by a requirement to respond to requests for homeless assistance in *the best interests* of the homeless individual.

Workstream 3: Reducing the harm done by a period of homelessness.

Quality of emergency accommodation

It has already been noted that Ireland now has a highest ever number of homeless shelter beds for single people, with over 3,000 beds in Dublin alone. Much of the debate on this has concentrated on the standards and quality of accommodation and whether it is provided by private for-profit operators (PEA) or by voluntary not-for-profit organisations.

Focus Ireland supports all measures which will improve the quality of emergency accommodation and which provide privacy and autonomy for people who are homeless. We also support a shift away from a system which sees homelessness as an opportunity for private profit.

Active and Passive Supports

Another way of looking at the provision of emergency homeless accommodation is to divide it between interventions which are ‘passive’ and those which can be seen as ‘active’. This draws on the analytical framework adopted in labour market measures which was so instrumental in tackling long-term unemployment in the 1990s. ‘Passive’ interventions are those which respond to the immediate human needs of the person: in the case of unemployment this is the weekly welfare income and in the case of homelessness it would refer to the provision of night shelter and services such as food. ‘Active’ measure against unemployment included supports such as training, job search skills, capacity building; in the case of homelessness such supports would include case management based on an exit plan, accommodation finding and tenancy support.

From this perspective, the growth in PEA (which typically is an accommodation only service) at the expense of voluntary homeless agencies can be seen not as an ideological question but as a shift of resources away from ‘active’ measures and toward ‘passive’ measures. As a consequence, a large proportion of single homeless people do not have an active case manager and have no exit plan from homelessness¹⁶.

Couples

There is considerable evidence that an increased number of homeless people which to be treated as couples yet homeless residential accommodation is overwhelmingly designed for single individuals. A transition to a lower level of better quality homeless accommodation must include appropriate provision to provide emergency accommodation to couple, so respecting their right to mutual support in traumatic circumstance

Dual diagnosis

The barriers faced by people who have both a mental health problem and a drug addiction have been recognised by the homeless system for several decades, yet persist. ‘Housing for All’ should

¹⁶ For more discussion of this see Allen (2020) ‘Review of 7 years of spending on homelessness shows it’s time to change’ <https://bit.ly/396Exyv>

address these issues and establish process to ensure that dedicated services capable of responding to people with 'dual diagnosis' are available for all who need them.

Rough-sleeping

The programme for ending homelessness should set an early target for ending the 'need to sleep rough', along with arriving at a shared understanding of what this requires. It is clear from the last ten years, that simply providing more and more emergency accommodation will not achieve this goal.

Treatment of non-Irish nationals

Our immigration system is complex and the process can involve significant delay. While a non-Irish national waits for their application to be processed or while awaiting an appeal, they can fall into a situation of destitution very quickly. In such a scenario, they will struggle to access emergency accommodation as a result of current rules and the application of Circular 41/2012, even in situations where their residency status will ultimately be confirmed. Language and literacy issues are a known barrier which should be urgently addressed as part of the 'Housing for All' strategy.

Non-Irish households fall into a gap which occurs between our immigration framework and our housing and homelessness policy. This gap – in knowledge, expertise, and communication – becomes an inability to access accommodation, leading to preventable homelessness.

As part of the Irish Homeless Policy Group, Focus Ireland completed a project entitled "[Ensuring a Home for All](#)" on discrimination experienced by migrant households when accessing homeless services and housing in Ireland. We would strongly encourage that a review of these findings and how the Public Sector Duty might be better used to tackle the discrimination faced by non-Irish households when accessing homeless and housing supports.

Workstream 4: Housing Supply

The supply of and short-term flexibility around 1-beds

For most of the people moving out of homelessness into Housing First tenancies, 1-bedroom accommodation is the appropriate housing allocation. However, there is very limited supply of 1-bedroom units right across the country, and in some areas, there are no such units available at all. Rebuilding Ireland targets were expressed entirely in terms of 'number of units' without consideration of the size of units required to meet demand. 'Housing For All' must set targets for delivery of 1-bed unit and respond to real challenges face by developers in increasing the supply of such units (including issues related to planning, the profit margins related to 1 and 2 bed units, etc). The targets for delivery of 1-bed units must take account of the existing demand for 1-bed units on general housing need housing waiting lists and the increased number of 1-person households in the general population.

As the number of 1-bed units increase, 'Housing for All' 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 block.

Members of the Housing First Platform, through their housing bodies, are fully committed to building and acquiring the maximum number of 1-bed units to expand Housing First. However, while the supply of 1-bedroom 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.

Workstream 5: Evidence and evaluation

The shortage of reliable data on the pathways into and out of homelessness for single people has already been noted. Systems to gather and publish data on the pathways into homelessness for single people should be an urgent priority for the new strategy.

As in other areas of data publication, Focus Ireland strongly urges a collaborative approach to defining the categories of data to be collected, how it is to be analysed and used. Data on homelessness needs to become a reliable tool to understand and solve the issue, rather than a flexible instrument of political dispute. Engaging the homeless organisations in a process of collaborative agreement about data would be the most effective approach to making that shift.