

FOCUS **Ireland**

**Focus Ireland Submission to the
*Framework Statutory Homeless Action
Plan for the Dublin Region 2022-2024***

29 October 2021

**Challenging
homelessness.
Changing lives.**

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Introduction

Focus Ireland welcomes the opportunity to make a submission to the Framework Statutory Homeless Action Plan (SHAP) for the Dublin Region 2022-2024. Our submission follows the framework set out by DRHE, except where we prioritise the pillars of 'prevention' and 'progression', with the important issue of 'protection' only being addressed where these measures have failed. We also address the issues of ensuring effective services and better co-ordination of funding arrangements identified in the background document.

The Homeless Action Plan for the Dublin Region 2022-2024 covers a similar period to Focus Ireland's own organisational strategy- [Restating our Vision 2021–25](#)- where we set out own 5-year strategic targets which include:

- 1,152 additional households will have a home through a Focus Housing Association tenancy, with tenancy support as needed.
- 5,000 households which have experienced homelessness will have moved out of homelessness with Focus Ireland support (in partnership with local authorities and national Government).
- 3,000 households that would have otherwise become homeless will have been assisted to keep their home or find an alternative (in partnership with local authorities and national Government).

Furthermore, our current housing pipeline for the Dublin Region between 2022-2024, will see Focus Housing Association build or acquire over 300 homes in partnership with local authorities in Dublin, the DRHE, Government departments and statutory agencies. We are confident that other opportunities, either through construction, part V or acquisitions, will be sourced over this period. Focus Ireland's unique contribution over the next number of years, will not be achieved alone. These goals will only be achieved through partnership and collaboration with local authorities and statutory agencies, like the DRHE, and we greatly welcome the opportunity to work together in tackling, and work towards ending, homelessness in Dublin.

This SHAP will be the first to be developed in the context of the Government's new housing and homelessness strategy, Housing For All. This strategy does not set out many specific policy initiatives in relation to homelessness, but rather provides a general framework in which local policies will be developed nationally and regionally. Where appropriate, this submission draws on the specific commitments in Housing For All in Focus Ireland's proposals for action in the Dublin Region. The most significant commitment in Housing For All in relation to homelessness is of course the commitment to work towards ending homelessness by 2030, as part of Ireland's commitment under the Lisbon Declaration. The SHAP currently under preparation will cover one third of the time available to achieve this 2030 goal, and it will be crucial that this plan make appropriate progress towards that goal but also that it puts in place some of the foundations for long-term measures that will be crucial during the closing years of Housing For All. We believe that the SHAP should set out clearly the ways in which it prepares the ground for the subsequent two SHAPs which will complete the pathway to 2030.

In this context, it is worth noting that the projections for housing supply in Housing For All indicate that, as the level of new building accelerates over the period, we experience the greatest problems of housing shortage during the period covered by the SHAP currently in preparation. This is likely to express itself in continued upward pressure on rents, overcrowding resulting in relationship breakdown, evictions due to change of use and pressure on social housing waiting lists. We believe

that the predominance of these pressures during the 2022-24 period should be acknowledged in the SHAP, both in terms of setting out realistic goals for reducing homelessness and in terms of re-emphasising the importance of prevention over this period.

1. Prevention

Over the last number of years, homeless service and DRHE in particular have become increasingly more effective at supporting the progression of households out of homelessness. The scale of progression now routinely achieved would have been unthinkable just few years ago and would have ended homelessness in a few months if achieved a decade ago.

While there are some enhancements in progression which will be addressed later, these will continue to only have limited impact if we cannot reduce the number of households becoming homeless through more effective prevention measures. Partly because of the pressures on the housing system over this period, already referred to above, work in preventing households that have already been supported out of homelessness from becoming homeless again will be of particular importance.

Protecting tenant security in private rental properties

Prior to the Covid-related protections to households in the private rental sector, the majority of homeless families had their last stable home in the private rented sector¹, with some spending an intermediate period with friends or family before entering homeless services. The largest single cause of families becoming homeless over the last few years has been landlords leaving the market, usually by selling the property and evicting the tenants in advance to maximise the sale price. All the evidence suggests that this pattern is reasserting itself since the Covid-related restrictions have been lifted.

It is recognised that the solutions to this problem lie at national policy level and that the policies available to the DRHE at a regional level can only have limited impact. However, given the scale of the problem that this creates for the DRHE, it would be a mistake to ignore this area entirely. There are two interventions which could be included in the SHAP to influence this area.

1) Selective purchase of 'evict-to-sell' properties. Given the scale of the problem, it would not be feasible to purchase every 'evict-to-sell' property where the tenant is eligible for social housing, and so retain the tenant in place.

However, there are properties where the potential harm to the tenant would make such a scheme cost effective and very much in the public interest. Such cases include where the tenant is elderly, has a disability or would otherwise be likely to spend a prolonged period in homeless accommodation, or be particularly at risk during such a period.

Proposed Actions

- Suitable AHBs to purchase private rental units which are for sale where the existing tenant is eligible for social housing and is assessed as having a high risk of prolonged homelessness if the property is sold.
- The SHAP should explore the viability of a scheme in which the DRHE would support evicted tenants as part of the sales process.

¹ Long et al., 2019. Family Homelessness in Dublin: Causes, Housing Histories, and Finding a Home.

2. Secondly, while the DRHE is not responsible for national policy, it has access to data on the reality of the situation which, if collated in a timely and authoritative manner, should influence policy. Government has consistently argued that the question of protections in the private rental sector is a matter of balance between landlords and tenants. Regular and reliable data on the pathways into homelessness would be a crucial element in assessing the appropriate balance between landlord rights, tenant rights, and the public interest.

Proposed Action

- The SHAP should include support for twice yearly assessment of the trajectories of families and individuals into homelessness. This support could be through, commissioning, partnering or simply making the necessary contact information available.

Rapid Rehousing

While prevention services are more effective the earlier the intervention occurs, there will always be a role for preventative action at the time of crisis.

Focus Ireland research into family homelessness shows that seven out of every ten families becoming homeless rented their last stable home from a private landlord and this has remained remarkably consistent since our first study in 2015². Families often spend a period of time couch surfing or moving between family members in an effort to avoid entering homeless accommodation. Engaging with families at this stage is hugely important to increase their chances of finding an alternative home in time to avoid having to enter emergency accommodation.

The DRHE reports significant success in this area with a scheme which allows households with a valid Notice of Termination to avail of the Homeless HAP scheme, which provides for a higher level of rent than mainstream HAP. However, despite the apparent success of this scheme it has never been evaluated and it had not been rolled out to other local authority areas. Awareness of the scheme is limited and there is no evidence that the decision to provide access to Homeless HAP 4 weeks before eviction is the optimum timescale.

Proposed Action

- The SHAP should provide for the successful DRHE homeless prevention scheme to be independently evaluated with a view to optimising its effectiveness and applying it to other areas, if appropriate. The evaluation should also consider expanding eligibility for Homeless HAP to people not residing in emergency accommodation, e.g., people who may be couch surfing or at the 'hidden homeless' stage.

² Long et al., 2019. Family Homelessness in Dublin: Causes, Housing Histories, and Finding a Home. P7. <https://www.focusireland.ie/wp-content/uploads/2021/09/Long-et-al-2019-Insights-Vol-2-No-1-Family-Homelessness-in-Dublin-%E2%80%93-Full-Report.pdf>

Advice and Information

To date Government strategies on preventative Advice and Information (A&I) 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-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.

Proposed Action

- The SHAP should continue to support expert A&I services (such as the service provided by the Coffee Shop, Focus Ireland Tallaght and Threshold) and ensure, along with the CIC network, that such expert preventative advice is funded to be accessible in all parts of the Dublin region.

Systems Prevention

Over the last two decades, Dublin Region Action Plans on Homelessness have included proposals for ‘protocols’ between the local authority and the health, special care and prison authorities to reduce the flow from these institutions into homelessness. While such protocols are an essential foundation, it is now clear that a much deeper institutional engagement is needed to be effective.

International experts on homelessness prevention³ 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 Strategy⁴ (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 today⁵.

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

⁴ National Homelessness Prevention Strategy (2002) <https://bit.ly/3tX72sj>

⁵ 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>

There is good reason to believe that these systemic routes into homelessness and the ‘institutional circuit’⁶ 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 state agencies, if they can mobilise the engagement of the relevant stakeholders.

Housing For All highlights the central importance of an ‘all-Government approach’ and the need to attain a new level of cross-departmental engagement but does not set out a mechanism through which this ‘all Government’ approach can be translated into an ‘all-agencies approach’ at regional level. The creation of new national collaborative structures provides an opportunity to re-energise the Regional Consultative Forum.

Proposed Action

- The Dublin Regional Consultative Forum should establish a task force with the role of developing a ‘systems prevention’ approach to interrupt the pathway into homelessness from state institution – prisons, psychiatric hospitals, general hospitals, special care.

Multi-disciplinary practice 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 methodologies have been applied as measures to prevent people who have complex support needs that are likely to result in them becoming chronically homeless from having to go down that path. This approach is referred to in the first 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 relevance⁷. More recently, the positive experience of Focus Ireland’s 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 innovations⁸.

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)⁹. This indicates the increased importance of this route into homelessness – and the need to address it.

⁶ Daly, Craig and O’Sullivan. (2018) The Institutional Circuit: Single Homelessness in Ireland, European Journal of Homelessness 12(2) pp.79-94.

⁷ Sarma (2014) Evaluation of the Cork Prison In-Reach Pilot Project.

⁸ 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.

⁹ Focus on Homelessness Vol: 4 ‘Adult-only Households’ pp.14

Similarly, there is now a significant body of work in relation to the 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.¹⁰

Proposed Action

- The SHAP should establish a pilot projects with the HSE in the North and South of the Region to develop multi-disciplinary housing led solutions to prevent homelessness among people being discharged from psychiatric hospitals with no place to live.

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/TSS is important in this and must be continued for households with low/medium support needs. Housing First provides a similar support for people with high support needs to prevent them returning to homelessness.

Proposed Action

- The SHAP should include a review of the current SLI/TSS provision to ensure that an appropriate intensity and duration of housing support is available to all households that need it to prevent them returning to homelessness.

There is significant anecdotal evidence that a number of households exiting homelessness struggle to sustain their tenancy, either because they did not receive support or the SLI support was insufficient for their needs. The evidence is not available to us to recommend the best solution to this

¹⁰ Dowling (2020). An Evaluation of the North Tipperary Intensive Tenancy Sustainment Service.

problem, but the policy objective should be to ensure that any gaps in support are closed to minimise the prospect of return to homelessness

Housing Assistance Payment arrears

Focus Ireland's A&I services are increasingly being contacted by tenants in private rented sector tenancies supported by HAP who are facing the risk of eviction, often due to rent arrears to the local authorities. Prior to the pandemic, the Central HAP unit in Limerick had a strong record of keeping HAP arrears to a much lower level than that experienced in Local authorities or AHBs.

However, the challenges of the pandemic along with rising rents, the scale of 'top-ups' and the mismatch between HAP thresholds and market rents will make this much more challenging during the next few years. A Homeless HAP tenant being evicted and returning to homelessness due to rent arrears should be recognised as a catastrophic failure of policy and practice – not only is the tenant retraumatised by the experience, but the good-will of a landlord is lost and the tenant returns to homelessness with debt burden which will make it even more difficult for them to exit a second time.

Focus Ireland experience indicates that a pro-active engagement by a case manager before irrevocable steps are taken to cease the Homeless HAP rental payment to the landlord can assist the tenant to agree an arrears repayment plan and budget to sustain the tenancy.

Proposed Action

- The SHAP should include the objective of minimising the number of Homeless HAP tenancies lost due to rent arrears and should set out the principal that HAP rental payments should not be stopped or suspended before the support of a case manager is made available to the tenant to try to resolve the issue of arrears.

Older people and homelessness

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 occasions¹¹.

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.

¹¹ Bevan, Jones and Pleace (2015) 'Service Evaluation of Focus Ireland Long-Term Supported Housing: Review of Congregate and Clustered Housing'.

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 SHAP notes this emerging issue and puts in place a process to plan appropriate policies and funding supports in good time.

Proposed Action

- The Dublin Regional Consultative Forum should establish a working group involving the appropriate state agencies, AHBs and homeless NGOs to address the challenges of people (in homeless accommodation or supported housing) who are ageing prematurely as a result of an experience of homelessness.

Special measures related to young adults

Local Authorities have the same statutory responsibility for young homeless adults as they do for all other adults, but for a number of historical reasons the specific needs of young adults tend to be overlooked or given lower priority.

This needs to reflect the particular pathways of young adults into homelessness, their particular experience of homelessness and their on-going development needs and vulnerabilities. International evidence indicates that a disproportionate number of young homeless people are LGBTQI+.

A recent Focus Ireland and BeLonGTo report¹² into the experiences of homeless LGBTQI+ youth in Ireland called for the Youth Homelessness Strategy to include specific reference to the particular risks and pathways into homelessness which LGBTQI+ youth are likely to experience.

Proposed Actions

- The SHAP should include a provision to revisit appropriate elements in the light of the National Youth Homelessness Strategy and publish a 'Youth Annex' by the end of 2022 once the the Government publishes the new National Youth Homelessness Strategy in early 2022.
- In advance of the National Youth Homelessness Strategy, the particular risk of LGBTQI youth experiencing homelessness should be referred to in the SHAP, to help support the on-going work of the Dublin Homeless Network and DRHE in developing staff training and safe spaces.

¹² Quilty and Norris (2020). 'A Qualitative Study of LGBTQI+ Youth Homelessness in Ireland'. Available at: https://www.focusireland.ie/wp-content/uploads/2020/09/LGBTQI-Youth-Homelessness-Report_FINAL-VERSION.pdf

In the meantime, several specific actions can be set out in the SHAP, including:

Proposed Actions

- Engage with appropriate other stakeholders to support an outreach programme which ensures that the issue of transitioning to independent living is addressed in school and youth service programmes so that adolescents can learn what is involved in leaving home and how they can plan towards it, as well as the nature, risks and consequences of homelessness, and assistance available.
- Family conflict or breakdown is a major cause of youth homelessness. Skilled family mediation services can effectively prevent or end homelessness for a young person by resolving the conflict in many cases (e.g.: there was no abuse or neglect). Tusla currently funds family mediators and these services should be recognized and named in the SHAP, with a view to increasing the Tusla investment in this effective preventative service.
- Similarly, Tusla's Crisis Intervention Service to prevent young people transitioning from homelessness while under-18 to adult homelessness post-18 should be recognized as part of the prevention fabric of the Region and linked operationally into Section 10 funded services.
- Guarantee that where a young person does become homeless and presents to services that they will receive a comprehensive assessment and will be transferred from emergency accommodation within two weeks.
- The concentration of services for vulnerable young people in city centres is inappropriate and can place already vulnerable young people at greater risk. The strategy should commit to decentralising youth homeless services.

2. Progression

Ensure that social housing is allocated to households that will otherwise remain homeless.

Allocation of social housing remains one of the most significant and effective resources available for tackling family homelessness – however its application has been dogged by political and administrative disputes which have reduced its potential positive impact.

The ministerial directive in January 2015 which assigned 50% of local authority allocations in Dublin and 30% elsewhere to the priority list resulted in a significant increase in the number of families exiting emergency accommodation and moving into social housing. This directive met resistance from

politicians and senior local authority officials and was discontinued in Q1 2016 without any evidential basis.¹³

While the initial directive was a relatively unsophisticated policy tool, the data for the period in which it operated shows that it was successful in its objective of reducing family homelessness and could have been refined to target those most in need rather than abandoned.

In Dublin City Council, the decision to ring-fence the ‘homeless priority’ of families already in the system means that this policy has continued to play a key role in the high level of exits achieved. Active management of such vacancies by the DCC Housing Department during the pandemic also made a, largely overlooked, contribution to the successful response to Covid-19 by homeless services¹⁴. As the number of these ring-fenced ‘homeless priority’ families declines, exits from homelessness will depend to an even greater extent on HAP, unless a new form of prioritisation of the long-term homeless families and the ‘hard to place’ is agreed.

Proposed Action

- The SHAP should commit to the establishment of consensus on a new, evidence-based approach to social housing prioritisation for homeless families with high support needs.

Expansion and deepening of Housing First.

Focus Ireland welcomes the commitment in ‘Housing For All’ to further expand the Housing First programme by over 1,200 tenancies across the country over the next five years. 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 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. There will be significant challenges in meeting Housing First targets over the next five years, particularly given the severe lack of 1-bed accommodation.

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.

¹³ Allen, Benjaminsen, O’Sullivan and Please, 2020. Ending Homelessness?: The Contrasting Experiences of Ireland, Denmark and Finland. Policy Press. pp.130.

¹⁴ Homeless Figures and the Impact of COVID-19 - Focus Ireland Blog (October 2020) <http://bit.ly/3pfAzdT>

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.

In the Irish context, the HF National Implementation Plan rolled out the delivery of Housing First on the basis of ‘winner takes all’ competitive tendering. As result the expertise and commitment of organisations which were unsuccessful in the tendering process were not available to local authorities. We do not believe that this was the most effective use of the expertise and capacity in relation to Housing First that exists in the region. A system which allows a range of organisations to provide Housing First support to cohorts of people moving out of homelessness will deliver a more effective service for tenants and the DRHE.

Proposed Action

- Contracts for the delivery of Housing First should be allocated in a way which maximises the contribution which all suitably skilled and resourced organisations in the Region can make to the programme.

Multi-disciplinary team support for families with complex needs

The benefits of a multi-disciplinary support model for entrenched rough sleepers have been well-documented in Housing First.

A small proportion of homeless families have complex support needs and require a similar level of multi-disciplinary team support if they are to successfully sustain a tenancy and integrate into their neighbourhood. There are worrying indications that a new form of ‘staircase model’ is being developed for these high-needs families, where a period in emergency accommodation is presented, without evidence, as having ‘therapeutic value’¹⁵.

Proposed Action

- The SHAP should include the piloting of a multi-disciplinary support service for families with high/complex support needs to rapidly move families out of emergency accommodation, stabilise their situation, and then work towards resolving any complex needs which may have caused or contributed to their experience of homelessness.

The families whose complex support needs create the greatest barriers to sustained exits from homelessness include those who have ‘episodic’ patterns of exit and return to homelessness, as well as some of the families who have been longest in emergency accommodation. The piloting of a multi-

¹⁵ Haran & Ó Siochrú, 2020. ‘Models of Emergency Accommodation for Homeless Families in Ireland’. Dublin: Focus Ireland.pp.79.

disciplinary team model for such families will allow for the careful planning of an appropriate service model, based on core Housing First principles, that can then be rolled out more broadly.

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. We welcome the approach reflected in recent DRHE reports to Councillors, where the approach to local connection is driven by whether or not 'the person has access to better outcomes in their local authority of origin'.

Proposed Action

- The SHAP is an appropriate place for the DRHE to set out its strategic approach to assessing 'Local Connection' on the an assessment of where the person has access to better outcomes.

Tusla CAS

The Tusla CAS scheme which provides homes for young vulnerable people leaving care is one of the most important measures that has helped tackle youth homelessness over recent years. Because of the scale involved, the Dublin Region has experienced greater problems of co-ordination between Tusla and local authorities than in many other regions, and this has limited the potential impact of the scheme in Dublin.

In the protocol between local authorities and Tusla, it states that "Where the assessment of accommodation needs of the young person leaving the care of the Agency determines that social housing is the most appropriate form of accommodation for that young person, the provision of such social housing will be subject to availability and the operation of the relevant Housing Authorities Allocation Scheme" (p.6). In effect, this means that care leavers are precluded

from accessing local authority housing because allocations are based on the length of time on the housing list.

Proposed Actions

- The joint protocol between local authorities and Tusla, which has been in place since 2014, should be reviewed.
- In collaboration with Tusla and appropriate AHBs and NGOs, the SHAP should ring-fence a number of social housing units specifically for identified young people leaving care who are assessed as being at high risk of homelessness. And Tusla could provide each local authority with the necessary data to enable them to track demand year-on-year.

Applying Housing First practice to young adults

Housing First is acknowledged internationally as the way to address homelessness effectively. Focus Ireland supports the application of Housing First principles to young vulnerable people facing

homelessness, reflecting their unique needs. We hope to see progress in this area in the forthcoming Second National Implementation Plan on Housing First and the National Youth Homeless Strategy.

Proposed Action

- The SHAP should acknowledge these forthcoming Second National Implementation Plan on Housing First and the National Youth Homeless Strategy and allow room for adaption to reflect their proposals.

3. Protection

Initial contact with homeless services

When a family becomes homeless the first step they must take is to register with their local authority. The administrative system they encounter in their local authority offices is one which conscientious local authority staff have created to deal with an escalating problem in a manner which is both humane and protects public resources. They have done this in the absence of an adequate policy, legislative framework or specialist training which could have been set at national level.

Focus Ireland recognises and strongly welcomes the significant improvement in the initial engagement with homeless families in each of the four Dublin local authorities. Particularly welcome have been the ending of systematic ‘one-night-only-provision’ and the reduction of the system in which distressed families had to secure their own emergency accommodation (‘self-accommodation’). These changes represent some of the most significant progress under the outgoing SHAP and should be noted as such.

However, we are concerned that these improvements represent changes in *practice* and not in policy, and we are concerned that in the unwelcome event of a return to the scale of presentation seen in 2017/18, practice might revert. Legal practitioners working in the area have highlighted that “the wide margin of discretion afforded to the local authority within the current legal framework pertaining to provision of emergency accommodation does not adequately protect families with minor children who are facing homelessness”¹⁶ This remains deeply problematic.

Focus Ireland believes that the presence of one or more dependent children among the persons normally residing with the presenting adult must be a primary determinant in the decision-making process of the local authority. The presence of a minor should substantially alter the burden of proof required to decide whether a family have no alternative accommodation open to them. We also believe that when a child is accepted as homeless with their family, the clause in the Housing Act 1988 which *enables* local authorities to provide assistance should become be seen as *obligation*.

The best way of achieving this is reform and modernisation of the legislation in this area to remove grey areas, boost transparency, and ensure a legal approach which is consistent with rule of law principles, and which supports local authority decision makers. While this is currently lacking, there is nothing to prevent the Dublin local authorities from setting down their own principles and providing clear written guidance. With DRHE support, Focus Ireland has established a day service to provide a multi-disciplinary first point-of contact and support for homeless families. This

¹⁶ Mercy Law Centre, 2019. Report on the Lived Experiences of Homeless Families. pp.9-
<https://mercylaw.ie/wp-content/uploads/2019/12/MLRC-Child-and-Family-Homelessness-Report-5.pdf>

service provides skilled, trauma-informed advice and a gateway to other supportive social services. The Centre also provides a child support service to allow hard-pressed parents to access counselling or other supports or to more effectively attend viewings of properties to rent. Appropriate sustainable funding lines for this service should form part of the new strategic approach.

Proposed Action

- The SHAP should commit to ensuring the ‘best interests of the child’ are at the heart of any interaction with families that are homeless. This should include a clear process for informing Tusla where families are not provided, or decline, offers of emergency accommodation and are at risk of having to sleep without shelter.

Immigration status and access to homeless services

Immigration status can act as a barrier to accessing homeless services and the interaction between the asylum system, immigration system, and homeless services needs urgent attention.

Where a person’s immigration status may dis-entitle them to access to mainstream social and housing support, there are other human rights requirements which are sometimes overlooked. For example, the right to family life and rights of the child must be considered where a family with children are refused accommodation, potentially exposing them to an experience of rough sleeping and the trauma which this creates. Families can find themselves caught in an immigration limbo where they are refused access to homeless services, but no further assistance or State intervention is offered to resolve their immigration status.

The inadequacy of existing regulations in this area has been highlighted for many years by the IHREC, homeless organisations, the DRHE and local authorities.

Proposed Actions

- The SHAP must ensure that this limbo is removed by identifying areas in which cross-agency cooperation is needed and mechanisms for ensuring that families in need of accommodation who have an unresolved immigration issue can receive the advice and support they need, without leaving them in a state of destitution.

One-night-only accommodation

Focus Ireland welcomes the ending of the practice of ‘on-going one-night only’ accommodation. We regret that it was deemed necessary, as part of the decision to discontinue the persistent and long-term use of this approach, to also remove the flexibility to provide emergency accommodation where applications are incomplete but imminent.

Proposed Action

- The SHAP should commit to not returning to the persistent long-term use of ‘one-night-only’ accommodation, while finding space for appropriate flexibility in not denying emergency accommodation where applications are not yet complete.

Maximum duration of homelessness and ‘progressive engagement’

Allowing families to remain in emergency accommodation for prolonged periods of time is damaging and wrong. International research has shown that the longer families remain in homelessness, the more the situation can impact on children. Aside from nutritional and educational impacts, this can also result in higher stress levels, anxiety, and behavioural disorders.

An effective strategy must include a reduction in the number of families who are homeless for prolonged periods as one of its key performance indicators.

A maximum period of homelessness should be set, initially at two years, and then reduced by steps, with a long-term view of bringing family homelessness to a rate of ‘functional zero’ in which no family remains homeless for more than a couple of weeks.

There is a risk that a maximum period of homelessness could become a mechanism to blame or penalise families. Instead, the maximum period should be a mechanism for ‘progressive engagement’ through which resources and options for families incrementally increased as time passes¹⁷.

The reasons for the lack of move-on should be highlighted and a plan to overcome these should be developed as a collaborative process between the case manager and the family. This would also allow services to evaluate whether specific child support services are now needed given the length of time children have been residing in emergency accommodation.

These timeframes should be realistic and used as an objective measure of need, not as a political tool to criticise failings. Families which spend prolonged periods of time in emergency accommodation are often those with the most complex needs. Keeping visibility on this category and working towards a deadline for moving them out of emergency accommodation will ensure better outcomes for them.

Proposed Action

- The SHAP should set an objective of ensuring that, by 2024, no family remains in emergency accommodation for longer than 12 months.

Quality of emergency accommodation

It has already been noted that Ireland now has the 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.

¹⁷ Culhane et al., 2011. A prevention-centred approach to homelessness assistance: a paradigm shift? Housing Policy Debate, 21(2), pp.295-315.

<https://www.tandfonline.com/doi/abs/10.1080/10511482.2010.536246>

We know from our work with families that even families with resilience who are experiencing homelessness for purely economic reasons can develop serious social needs the longer they spend in emergency accommodation. For vulnerable families, emergency accommodation seriously exacerbates underlying needs and can cause these to become entrenched. Where prevention is not possible, rapidly moving families out of emergency accommodation and into stable housing with appropriate supports is the next best option for them. However, both prevention and rapid rehousing have not been working for a large number of families for many years, resulting in the need for ever increasing amounts of emergency accommodation. A large amount of such provision has been created over the last number of years. While it important to recognise the pressures under which emergency accommodation was commissioned, it is also necessary to note that it was commissioned in the absence of any child-centred or trauma-informed guidance.

As local authorities across the country have struggled to increase the amount of emergency accommodation available for families that are homeless, significant problems about quality standards have emerged. For some families residing in emergency accommodation, the range of difficulties are numerous and well-documented by many organisations working in the sector.

These include:

- cramped and overcrowded hotel rooms
- a lack of space for play and homework
- the imposition of rules which undermine parents
- a lack of access to cooking and food storage facilities
- a lack of washing facilities, difficulty getting to school or work
- a deterioration in family relationships

Proposed Actions

- The SHAP should specify that supports for children experiencing homelessness must include access to sufficient space for homework and study; access to child support workers or other developmental supports and outlets; access to mental health supports where needed.
- The SHAP should ensure that caseload ratios across Short Term Accommodation take into consideration the number of children in each household unit.

Family Hubs

While Family Hubs emerged out of a recognition of the unsuitability of hotel/hostel accommodation for families, they have become entrenched as a long-term response to family homelessness without regard to their suitability for this. It has now been over two years since the Ombudsman for Children called for a review of Family Hubs to be carried out urgently. Half of homeless families (48%) now spend over a year in emergency accommodation. The suitability of hubs and their ability to assist families to exit homelessness for good must be assessed to prevent any family from facing long durations in homelessness in unsuitable conditions.

For now, Family Hubs are an emergency response to an ongoing problem. Without any long-term strategic plan, the hubs are not working towards ending family homelessness. The Ombudsman's report on Family Hubs, "No Place Like Home," found that "parents in particular were concerned that

the Family Hubs were becoming a long-term solution to family homelessness and they and their children would be forgotten about. They expressed concern that while the Government were continuing to open and invest in Family Hubs, no one had looked at whether they were effective or how they were operating.”¹⁸. Many of the issues identified in the OCO report arise from the fact that Family Hubs were established in the absence of clearly articulated objectives and have continued as Government policy without any evidence or analysis.

Proposed Action

- The SHAP should commit to carrying out an evaluation of all family hubs in line with proposals by the Office of the Ombudsman for Children's 'No Place Like Home' report.

Therapeutic Supports

Families experiencing homelessness can often require additional support to manage their situation. Some families have support needs which predate their entrance into homelessness, and others develop additional needs given the extended periods of time that they are spending in emergency accommodation. Therapeutic supports should be available to all families in emergency accommodation and could be targeted at children alone or at parents and the family as a whole.

Children and parents consulted by the Ombudsman for Children’s Office¹⁹ reported that child support workers were one of the few positive aspects of being in a Family Hub; the Ombudsman recommended that “further attention should be given to identifying additional practical measures (for example, an increase in therapeutic supports and child support workers) that could be implemented to support the resilience, dignity and self-worth of children and parents while they are living in emergency accommodation”. Not only do child support workers help to address some of the detrimental impacts of homelessness, by extension, they can help to reduce the pressure and stress on parents²⁰ 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.

Proposed Action

- The SHAP should note the potential of trauma for children in homeless families, the beneficial impact of Child Support Workers and the contribution of Tusla and the HSE in funding the existing posts.

¹⁸ Ombudsman for Children’s Office, 2019. No Place Like Home: Children’s views and experiences of living in Family Hubs. <https://www.oco.ie/app/uploads/2019/04/No-Place-Like-Home.pdf>

¹⁹ Ombudsman for Children’s Office, 2019. No Place Like Home: Children’s views and experiences of living in Family Hubs. <https://www.oco.ie/app/uploads/2019/04/No-Place-Like-Home.pdf>

²⁰ Siersbaek & Loftus, 2020. Supporting the mental health of children in families that are homeless: a trauma informed approach.

Currently, there are a considerable number of children with assessed needs who are unable to access childcare supports. Addressing this shortfall in support workers and expanding this support to parents and families could significantly improve family wellbeing while in emergency accommodation and support families to successfully exit homelessness for good.

Youth Specific services

Young people experiencing homelessness are in a uniquely disadvantageous position vis-a-vis their lack of housing options and the lack of youth-specific homeless services (both emergency and preventative). And because services are not youth-specific, many young people are afraid to access them and so don't receive the supports they need. Moreover, their refusal to access adult homeless services means the extent of youth homelessness is not captured in the data. If young people, such as care leavers, experience homelessness, it is essential that youth-specific services (accommodation and day services) are available so that they can be helped to move out of homelessness as quickly as possible and with the right supports (designed to meet their specific psycho-social needs).

Proposed Action

- The SHAP should note the importance of having youth-specific services so that young people can be helped out of homelessness as quickly as possible.

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 homelessness.²¹

Proposed Action

- The SHAP should set an objective of ensuring that all adults in PEA have access to an active case manager.

²¹ For more discussion of this see Allen (2020) 'Review of 7 years of spending on homelessness shows it's time to change'.

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

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 support.

4. Ensure adequate and sustainable funding mechanisms

It is essential to set out a stable and long-term funding model for the homeless sector, in which the different responsibilities of the Local Authorities and statutory agencies are clear, co-ordinated, and adequately funded. The availability of multi-annual, sufficient, and sustainable funding for homeless service providers is necessary to provide the full range of supports needed for those who are homeless or at risk of becoming homeless, to support people to move out of homelessness, to increase the supply of housing, and to prevent and eliminate homelessness.

One of the remarkable features of the response to the pandemic was the renewed sense of collaboration, teamwork, and partnership between service providers, local authorities, and health services. This renewed sense of partnership and trust demonstrated how effective collaboration between all parties can be in an emergency on behalf of vulnerable people, and we believe that there are aspects that we need to retain, learn from, and build on as we work together in the future with the shared goal of making homelessness a thing of the past.

The publication of Housing For All is a very welcome development, and we support it fully in its ambition to eradicate homelessness as it aligns with our own vision, but service providers must be properly funded in order to play our part in ensuring that achieving this target is possible.

As it currently stands, the funding mechanisms in place for the delivery of homeless services are not adequate and sustainable, nor do they reflect the full cost of delivery of services. This situation has existed for many years and service providers have struggled in an environment of underfunding and increased regulation.

Focus Ireland currently relies heavily on public donations so we can provide the quality and breadth of services that we know are necessary in preventing homelessness, supporting people experiencing homelessness and moving people out of homelessness into long-term, supported, housing. This model is not sustainable long-term.

Below, we outline some of the main challenges that are caused of the chronic underfunding of homeless services.

Recruitment and remuneration of staff

The funding model for homeless services should recognise the skills and qualifications required to staff effective homeless services. This means ensuring that systems are in place to fund appropriate remuneration, pension arrangements and continued professional development for the skilled and experienced staff which are essential to respond to the complex needs of many people who are homeless. The current funding mechanism do not allow service providers to remain competitive regarding recruitment of staff posts which poses serious challenges in providing the highest quality service possible for vulnerable people, nor does it provide the best work environment for our staff. Stressful, understaffed environments are increasingly causing burn out and exhaustion which has required increased prioritisation and investment, all of which comes at an increased cost to organisations providing homeless services.

Tendering

The use of weightings and marking schemes in tender submissions ultimately leads to the least expensive tender securing the tender regardless of service or quality. Where competitive tendering is to be used to contract out services, a model which does not undermine collaboration in the sector or reward below-cost bidding but does promote high standards and effectiveness should be adopted.

Rising Inflation

Rising inflation in Ireland is driving up the cost of providing homeless services and housing. In particular, construction costs have been heavily impacted by the Covid-19 pandemic, Brexit and now increased inflation, which poses significant challenges in meeting social housing targets over the next number of years.

The SHAP should recognise that the 2020-24 period is likely to be characterised by a significant rise in inflation and commit to ensuring that the funding of NGOs to provide services is increased and flexible to reflect inflation levels and developments in wage levels in public and private sectors.

Health and Safety and management of risk

There has been an increase in the severity and extent of complex needs in those who use homeless services. There has also been an increase in incidents relating to threats and assaults of staff, overdoses, and increased rate of domestic violence incidents. The increased challenges in relation to complex needs have required improvements in a number of health and safety measures that need to be in place to keep our staff and people we support safe. This includes building and fire management, child protection and vulnerable adult's management. Legislative and statutory requirements have also increased in recent years in relation to health and safety measures. The implementation and management of additional health and safety measures will require additional funding to ensure the standards can be reached and maintained, and this should be reflected in funding mechanisms.

Increased Governance and compliance costs

Homeless service providers are facing increased demands and costs in relation to governance, compliance, and quality. We recognise the importance of providing well-governed and managed organisations and delivering high-quality services, however, the costs of compliance are difficult to meet given that these additional costs have been largely ignored in funding allocations.

The SHAP should recognise that that funding for homeless services should include the increased costs of complying with quality and compliance frameworks.

Appendix One: Summary of actions proposed by Focus Ireland

1. Prevention- Focus Ireland's Proposed Actions

<p>Protecting tenant security in private rental properties</p>	<ul style="list-style-type: none"> • Suitable AHBs to purchase private rental units which are for sale where the existing tenant is eligible for social housing and is assessed as having a high risk of prolonged homelessness if the property is sold. • The SHAP should explore the viability of a scheme in which the DRHE would support evicted as part of the sales process. • The SHAP should include support for twice yearly assessment of the trajectories of families and individuals into homelessness. This support could be through, commissioning, partnering or simply making the necessary contact information available.
<p>Rapid rehousing</p>	<p>The SHAP should provide for the successful DRHE homeless prevention scheme to be independently evaluated with a view to optimising its effectiveness and applying it to other areas, if appropriate. The evaluation should also consider expanding eligibility for Homeless HAP to people not residing in emergency accommodation, e.g., people who may be couch surfing or at the 'hidden homeless' stage.</p>
<p>Advice and Information:</p>	<p>The SHAP should continue to support expert A&I services (such as the service provided by the Coffee Shop, Focus Ireland Tallaght, and Threshold) and ensure, along with the CIC network, that such expert preventative advice is funded to be accessible in all parts of the Dublin region.</p>
<p>Systems Prevention.</p>	<p>The Dublin Regional Consultative Forum should establish a task force with the role of developing a 'systems prevention' approach to interrupt the pathway into homelessness from state institution – prisons, psychiatric hospitals, general hospitals, special care</p>
<p>Tenancy Sustainment and ensuing no return to homelessness.</p>	<p>The SHAP should establish a pilot project with the HSE in the North and South of the Region to develop multi-disciplinary housing led solutions to prevent homelessness among people being discharged from psychiatric hospitals with no place to live.</p>
<p>Homeless Students and Children</p>	<p>The SHAP should include a review of the current SLI/TSS provision to ensure that an appropriate intensity and duration of housing support is available to all households that need it to prevent them returning to homelessness.</p>
<p>Housing Assistance Payment arrears</p>	<p>The SHAP should include the objective of minimising the number of Homeless HAP tenancies lost due to rent arrears and should set out the principal that HAP rental payments should not be stopped or suspended before the support of a case manager is made available to the tenant to try to resolve the issue of arrears.</p>

Older people and homelessness

The Dublin Regional Consultative Forum should establish a working group involving the appropriate state agencies, AHBs and homeless NGOs to address the challenges of people (in homeless accommodation or supported housing) who are ageing prematurely as a result of an experience of homelessness.

Special measures related to young adults

- The SHAP should include a provision to revisit appropriate elements in the light of the National Youth Homelessness Strategy and publish a 'Youth Annex' by the end of 2022.
- In advance of the National Youth Homelessness Strategy, the particular risk of LGBTQI youth experiencing homelessness should be referred to in the SHAP, to help support the on-going work of the Dublin Homeless Network and DRHE in developing staff training and safe spaces
- Engage with appropriate other stakeholders to support an outreach programme which ensures that the issue of transitioning to independent living is addressed in school and youth service programmes so that adolescents can learn what is involved in leaving home and how they can plan towards it, as well as the nature, risks and consequences of homelessness, and assistance available.
- Family conflict or breakdown is a major cause of youth homelessness. Skilled family mediation services can effectively prevent or end homelessness for a young person by resolving the conflict in many cases (e.g.: there was no abuse or neglect). Tusla currently funds family mediators and these services should be recognized and named in the SHAP, with a view to increasing the Tusla investment in this effective preventative service.
- Similarly, Tusla's Crisis Intervention Service to prevent young people transitioning from homelessness while under-18 to adult homelessness post-18 should be recognized as part of the prevention fabric of the Region and linked operationally into Section 10 funded services.
- Guarantee that where a young person does become homeless and presents to services that they will receive a comprehensive assessment and will be transferred from emergency accommodation within two weeks.
- The concentration of services for vulnerable young people in city centres is inappropriate and can place already vulnerable young people at greater risk. The strategy should commit to decentralising youth homeless services.

2. Progression- Focus Ireland's Proposed Actions

<p>Ensure that social housing is allocated to households that will otherwise remain homeless</p>	<p>The SHAP should commit to the establishment consensus on of a new, evidence-based approach to social housing prioritisation for homeless families with high support needs.</p>
<p>Multi-disciplinary team support for Families with complex needs</p>	<p>The SHAP should include the piloting of a multi-disciplinary support service for Families with high/complex support needs to rapidly move families out of emergency accommodation, stabilise their situation, and then work towards resolving any complex needs which may have caused or contributed to their experience of homelessness.</p>
<p>Expansion and deepening of Housing First</p>	<p>Contracts for the delivery of Housing First from 2020 should be allocated in a way which maximises the contribution which all suitably skilled and resourced organisations in the Region can make to the programme.</p>
<p>Local connection</p>	<p>The SHAP is an appropriate place for the DRHE to set out its strategic approach to assessing 'Local Connection' on an assessment of where the person has access to better outcomes.</p>
<p>Tusla CAS</p>	<ul style="list-style-type: none"> • The joint protocol between LAs and Tusla, which has been in place since 2014, should be reviewed. • In collaboration with Tusla and appropriate AHBs and NGOs, the SHAP should ring-fence a number of social housing units specifically for identified young people leaving care who are assessed as being at high risk of homelessness. And Tusla could provide each local authority with the necessary data to enable them to track demand year-on-year.

3. Protection - Focus Ireland's Proposed Actions

Initial contact with homeless services	<p>The SHAP should commit to ensuring the 'best interests of the child' are at the heart of any interaction with families that are homeless. This should include a clear process for informing Tusla where families are not provided, or decline, offers of emergency accommodation and are at risk of having to sleep without shelter.</p>
Immigration Status and Access to Homeless Services	<p>The SHAP must ensure that this limbo is removed by identifying areas in which cross-agency cooperation is needed and mechanisms for ensuring that families in need of accommodation who have an unresolved immigration issue can receive the advice and support they need, without leaving them in a state of destitution.</p>
One-night-only accommodation	<p>The SHAP should commit to not returning to the persistent long-term use of 'one-night-only' accommodation, while finding space for appropriate flexibility in not denying emergency accommodation where applications are not yet complete.</p>
Maximum duration of homelessness and 'progressive engagement'	<p>The SHAP should set an objective of ensuring that, by 2024, no family remains in emergency accommodation for longer than 12 months</p>
Quality of emergency accommodation	<ul style="list-style-type: none"> • The SHAP should specify that supports for children experiencing homelessness must include access to sufficient space for homework and study; access to child support workers or other developmental supports and outlets; access to mental health supports where needed. • The SHAP should ensure that caseload ratios across Short Term Accommodation take into consideration the number of children in each household unit.
Family Hubs	<p>The SHAP should commit to carrying out an evaluation of all family hubs in line with proposals by the Office of the Ombudsman for Children's 'No Place Like Home' report.</p>
Therapeutic Supports	<p>The SHAP should note the potential of trauma for children in homeless families, the beneficial impact of Child Support Workers and the contribution of Tusla and the HSE in funding the existing posts.</p>
Youth Specific services	<p>The SHAP should note the importance of having youth-specific services so that young people can be helped out of homelessness as quickly as possible.</p>
Active and Passive Supports	<p>The SHAP should set an objective of ensuring that all adults in PEA have access to an active case manager.</p>