



Focus Ireland Submission to Government's National Housing Plan 2025-2030

May 2025

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1. Introduction

Focus Ireland welcomes the opportunity to make a submission for consideration in drafting the new National Housing Plan, but is concerned about the short period allowed for consultation and completion of the Plan. Focus Ireland has consistently made the case that, to be effective, strategies to tackle homelessness must be based on a collaborative problem-solving approach. This view is reinforced by the [OECD toolkit on combatting homelessness](#). Short timeframes for ‘consultation’ do not build either the content or the approach necessary to deliver consistent, effective programmes to tackle homelessness.

The Programme for Government makes clear that one of the key objectives of the new plan will be to increase the overall supply of housing. To achieve this goal, Focus Ireland re-emphasises our support for the Report of the Housing Commission as a broad and coherent approach to most of the key challenges in housing delivery. Our submission draws attention to a number of specific Commission recommendations which are directly related to the objective of ending homelessness, but it is important to note that our support for the Commission Report is much broader than this. It is our view, in relation to housing supply, that the new Housing Plan should, to a large extent, be an implementation plan for the Commission Report.

A further consistent theme of Focus Ireland’s work is to emphasise that, while delivering sufficient affordable homes is important, it does not in itself constitute a strategy to tackle homelessness. If the new ‘Housing Plan’ is also to serve as the new ‘Homeless Plan’, the consideration of how to tackle homelessness must comprise more than an add-on chapter with a few useful actions but no identified impacts. In order for improved housing supply to drive down homelessness, it is essential to address issues such as the size and location of the homes being built, the mechanisms by which homeless households are blocked or supported into the available homes, what systems are in place to prevent people becoming homeless in the first place, and what health and social care systems are available to support them with other challenges they face in obtaining and sustaining a tenancy.

As the OECD toolkit makes clear, governments need to set out clear pathways showing how the above issues will be dealt with and how different elements will be coordinated across government. However, we do not expect this to be fully achieved in relation to homelessness within the timeframe set for government for the publication of the new Housing Plan. In that context, we would support an approach in which the Housing Plan contained a ‘homeless chapter’ in which a broad framework and key objectives are set out, but that specific areas which require more tailored initiatives (for instance on ‘homelessness prevention’, ‘youth homelessness’ or ‘family homelessness’) are specifically identified as requiring further work, as long as a clear timeframe is set for completing that work and an appropriate budget is allocated to deliver it.

The rest of this submission deals with the elements that must be included in the plan to ensure it is, in effect, a ‘Housing and Homelessness Plan’, and not just a Housing Plan.

2. Ending homelessness by 2030

The Government reaffirmation of its commitment to the Lisbon Declaration in the Programme for Government was very welcome, but in the context of the proposed Plan covering from 2025-

2030, we need to set very clear expectations of what can be achieved to deliver on the Lisbon Declaration 'commitment to work towards ending homelessness' by that date.

Prior to the 2024 election, and again during the negotiations for Government, Focus Ireland put forward an ambitious but achievable plan for ending long-term homelessness, tackling the legacy of a decade of failure on homelessness and making a new start.

⇒ ***Proposed action: Incorporate Focus Ireland's ambitious proposal to tackle long-term homelessness and provide a fresh start for the homeless system.***

The full proposal can be [read in full here](#), but in summary, we argue that in order to deal with the accumulated problems of ten years, we need to divide the problem into two parts:

Problem 1: How can we target the specific circumstances of the accumulated households that are already homeless as a result of what the Housing Commission termed the 'housing deficit', particularly those who are long-term homeless?

Problem 2: How can new measures be introduced to fix the ongoing issues in housing and the homeless system and how can we prevent the accumulation of new cohorts of homeless households?

We believe the first problem should be addressed through a once-off, ambitious measure that identifies all households that are long-term homeless and provides them with active, intensive case management and a dedicated stream of social housing.

This would leave the existing homeless system with the task of addressing the second problem, ensuring that the problem of long-term homelessness does not accumulate again, an objective which becomes attainable without having to simultaneously overcome the accumulated homelessness that has come from a decade of failure.

The Focus Ireland proposal involves a once-off measure to ring-fence all those who have been homeless for more than 6 months at the time the programme starts, so including all who have become, and remained, homeless as the result of the 'housing deficit'. However, a less ambitious but still meaningful version of the same approach could ring-fence a smaller group of households, such as those homeless for a year or 18 months or, in fulfilment of the Programme for Government commitment, just include long-term homeless families. However, to be credible as a 'once-off' measure, the ring-fenced group needs to be sufficiently large, as any expectation of subsequent initiatives that would include further households may result in political resistance and potentially distorting effects. Equally, the larger the group that remains outside the ring-fencing, the greater the challenge to the existing homeless services and the lesser the chance of a successful fresh start.

3. Social Housing supply

Ensure increased social home supply is used to reduce homelessness

⇒ ***Proposed Action: Ensure social housing supply increases to the new target of 12,000 homes per year and ensure these homes have the maximum impact on reducing long-term homelessness***

- ⇒ **Proposed Action: ‘Focus social housing allocations on getting families out of long-term homelessness’ as committed to in Programme for Government 2025 and broaden this commitment to include all homeless individuals, not exclusively families.**
- ⇒ **Proposed Action: Ensure these actions align with Housing Commission Action 68 to ensure the alignment of ‘strategic policy aims and objectives of future national strategies and plans with a homelessness dimension.’**

In contrast to preparations for most new National Housing Strategies, housing targets have already been decided for the next 6 years in the Programme for Government 2025. The outgoing Government committed to a target of 300,000 new homes, including 12,000 social houses annually, by the end of 2030, and this has been adopted by the incoming Government. While increased targets to better reflect future housing need is very welcome, to be credible the new Plan needs to address the consistent failure of ‘Housing for All’ to meet its less ambitious social housing targets.

The table below highlights how a deficit of nearly 4,000 homes has built up just in the last three years by a failure to meet Housing for All social housing targets. This issue is more acute in urban areas where most homeless households are concentrated. A new practice of carrying forward any missed delivery into subsequent years must be included in the new Housing Plan to ensure this gap between target and output stops widening.

Housing for All- New Build Social Homes Gap

	Build Target	Build Output	Number below target
2022	9,000	7,433	1,567
2023	9,100	8,110	990
2024	9,300	7,871	1,429
Total	27,400	23,414	3,986

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The Housing Commission report argues that tackling the accumulated housing deficit that has built up since the Global Financial Crash 2007/08 requires a supply of affordable, appropriate housing of around 235,000 homes in addition to the supply needed to meet structural demand (future need in line with population projections). Similarly, the accumulation of homelessness, which is the most visible manifestation of this deficit, requires such a supply of affordable, appropriate housing.

Experience over the last few years shows that such a supply is not, in itself, sufficient to guarantee a fall in homelessness and even less guaranteed to reduce long-term homelessness. Even if we fix the ongoing problems of the housing and homelessness system, we cannot expect its routine functioning to solve the problems built up over a decade. If we expect routine housing policy, in itself, to solve our accumulated homelessness problem, we will be living with large-scale long-term homelessness for many years to come.

The transition of households from homelessness into the housing system is not a simple issue of supply and demand but is mediated by a range of different factors and shaped by specific policies. There have been assumptions in recent years that a rising tide lifts all ships and that increased social housing supply will eventually start to reduce homelessness. But housing policies have not been designed to maximise the impact of housing supply on homelessness but rather to meet a number of different policy goals appropriate to different periods and different objectives.

To solve long-term homelessness, we need a specific and targeted approach. This new approach needs to place much greater emphasis on what kind of social homes we are building and where we are building them, as well as targeting these new homes towards households in homelessness.

Set targets and put in place the conditions to build the right social homes

- ⇒ ***Proposed Action: Record the size of homes being built and publish in the quarterly Social Housing Activity reports broken down by Local Authority area***
- ⇒ ***Proposed Action: Use the approval system for social home financing to align the size of homes constructed with housing need, resulting in Local Authorities and AHBs building one-bed homes for one-adult households, and larger homes for larger families stuck in homelessness, including Traveller families***
- ⇒ ***Proposed Action: Align these actions with Housing Commission Report Action 71 ‘Increase the supply of social housing that better matches the size of homeless households and households in need of social housing’***
- ⇒ ***Proposed Action: Commit to, and set in place milestones and timelines to achieve, Housing Commission Action 45 ‘Increase size of social and cost-rental sector to 20% of national stock’***

Right now, the type of social housing currently provided and being built does not clearly reflect the needs of the most vulnerable households. The Housing Commission Report highlights how in 2021, 12.5% of social homes provided contained one bedroom, 35% two bedrooms, 42% three bedrooms, and the remainder four or more bedrooms.

Most homeless households and households on social housing waiting lists are made up of one adult, but there is a significant shortage of homes for smaller one-and two-person households, and there is no evidence that LAs are building these smaller homes. The recently published [2024 Summary of Social Housing Assessments](#) highlight how one-adult households remain by far the majority grouping on the list and grew proportionately from 57.4% of the total in 2023 to 60.8% in 2024. This is not just an urban issue, as has been suggested by some Local Authorities. One-Adult Households were the majority group on social housing waiting lists in all 31 Local Authorities in 2024. Moreover, we know that larger 5+ person households are also ending up stuck in homelessness purely because almost no new 4 or more-bedroom social homes are being built.

The new National Housing Plan needs to go further than Housing for All in linking new social housing for Local Authorities directly with the need in an area. Targets on unit size need to be set

for all LAs, and LAs and AHBs need to be better supported by the new Housing Plan to deliver the right sized homes in each area.

Remove barriers to building homes in urban areas to reduce long-term homelessness.

⇒ ***Proposed Action: Government needs to ensure that social homes are being built in the right locations, specifically Dublin and other urban centres, to reduce the number of people in long-term homelessness.***

We know that most homeless adults and homeless families live in urban areas, with 70% of homeless adults living in Dublin, and half of all homeless families also living in Dublin. Even though there has been a marked increase in the number of social homes being built every year, the predominantly large urban centres, especially Dublin, where social housing need has expanded most since 2011, has seen the weakest supply response.

If the new Housing Plan is to have maximum impact on reducing homelessness, it needs to prioritise the building of new social homes in major urban areas. While the overall failure to meet social housing construction targets is of grave concern, the situation is even worse in the Dublin Region, with DCC in particular delivering 1,000 homes below target *annually* under Housing for All. There are clearly uniquely challenging conditions in Dublin City limiting the building of social homes, which is resulting in people being stuck in emergency accommodation for much longer in the Capital. These Dublin City challenges need to be addressed, but we also require a strong connection between new housing supply in the wider Dublin region and neighbouring counties and exits for people in emergency accommodation in the city.

We need our next government not only to commit to building more social homes but also to addressing the spatial mismatch between need and supply. This spatial mismatch in social housing delivery was examined further in the Housing Commission Report, which argued for significantly increasing the output of social and cost-rental housing in cities and the Dublin region to address particularly high numbers of households in need of housing and those who are homeless.

Ensure that commitments on ‘cost rental’ and ‘affordable homes’ do not erode social housing delivery.

In many local authority areas, development plans to deliver ‘cost rental’ and ‘affordable homes’ appear to be resulting in land which could have been used for social housing being diverted to these other forms of tenure. This is increasingly evident in the proposals for the Land Development Agency, which increasingly presents its remit in terms of ‘affordable housing’ with social housing representing a minority of new homes in some announced developments. Focus Ireland recognises the importance of additional affordable supply in all tenures. We also recognise the potential benefits of social mix in mixed tenure developments – though noting that in reality, most actual developments involve a high degree of special segregation of tenure types.

We argue, however, that the primary goal of public policy should be the provision of social housing, and the deployment of state resources should prioritise this goal. It will only be in very rare cases that households move out of homelessness into ‘affordable’ housing or even ‘cost rental housing’, so every project which is diverted from social housing construction to other

tenures is a lost opportunity to reduce homelessness. To avoid this diversion of potential social housing supply into other tenures, the National Housing Plan should include measures to ensure that all cost rental and 'affordable' housing projects are additional to plans to construct social housing.

Address issues affecting special needs AHB delivery

Focus Housing Association, the housing arm of Focus Ireland, is the largest Special Needs AHB and one of Ireland's largest AHBs, with a total housing stock of over 1,600 units and a goal of increasing our stock by around 200 units a year. Focus Housing is the only large-scale AHB specialising in providing homes for people who are homeless and have complex support needs. As such, measures which assist Focus Housing Association in achieving its goals – and encourage other AHBs to engage in the same objectives – are not just of relevance to Focus Ireland but are crucial to the success of any Government strategy to tackle homelessness.

Focus Housing's development strategy involves three main strands:

- i. construction of new homes, primarily using urban infill sites, either in partnership with developers or as design & build projects
- ii. conversion of urban, vacant buildings for housing use
- iii. acquisitions of scatter-site housing

In each of these strands of development, current policy is largely unsupportive, inharmonious, and frequently creates barriers to progress.

Issues related to providing tenancy support

⇒ ***Proposed action: A process should be established to integrate Departmental approval for social housing construction with departmental/local authority approval for provision of required Section 10 tenancy support workers.***

Focus Housing's specialised contribution to tackling the housing and homelessness crisis is to provide homes to people moving out of homelessness who have complex support needs and who would be unlikely to sustain a tenancy with other landlords. The Focus Housing model of housing and support has a very high success rate (over 90% tenancy sustainment), and involves a team comprising housing management staff, tenancy sustainment staff, and community development staff.

Although our tenant group requires a higher level of housing management staff than general needs AHBs, the CALF/PAA framework does provide sufficient funding for this element of support. On the other hand, at present, funding for the required tenancy sustainment staff, who are funded under Section 10, is negotiated with individual local authorities after the completion of the housing at the time of allocations. Where local authorities decline to provide support for tenancy sustainment staff, Focus Ireland must meet support costs from its own fund-raised resources. The accumulated cost of providing such staff is now creating a real impediment to further housing construction plans, and Focus Housing is considering scaling back its construction plans, withdrawing from certain counties, or reducing the number of tenants with support needs that it accepts. To allow Focus Housing to make its best contribution to providing homes for this group of people experiencing homelessness, we propose the formalisation of an approval model in which the approval for the construction of special needs social housing is integrated with approval of an appropriate level of funding for tenancy support. A crucial part of

this model would be an agreed framework for assessing support need, and this is discussed under the section ‘Homeless Overview’ on page 13.

Issues related to design and build projects

⇒ ***Proposed action: Create a single point of contact to resolve disharmonies in Government policy that block development, and specifically resolve the conflicting positions on forward financing of design and build projects.***

Focus Ireland shares the Government view that AHBs and Local Authorities should be primarily engaged in approaches which result in additional homes being constructed, rather than purchasing homes from the market after they have been constructed by private developers. This is reflected in the Programme for Government commitment to: “focus local authorities and AHBs on reformed delivery models in achieving new targets and restrict the ability of local authorities or Approved Housing Bodies (AHBs) to bulk purchase developments at the end of the construction process”.

However, the lack of coordination between different arms of Government presents significant challenges in following through on this policy for AHBs the size of Focus Housing.

To undertake design and build projects, an AHB must access forward funding at terms and interest rates that make the project viable. While the Department of Housing is promoting this approach, the main State vehicle for social housing financing, The Housing Finance Agency, takes a different approach and is highly cautious about providing such forward financing, except in the case of the largest AHBS with very large reserves.

As a consequence of this disharmony between different elements of the State’s response to housing, Focus Housing may not be able to play its full potential role in housing delivery. AHBs of a similar size, which could collectively be delivering a few hundred additional homes through this stream, will be similarly discouraged.

This is not only a major barrier, but also symptomatic of disharmonies across the system in which objectives set out by one part of the State are thwarted by another part. There is no single point of contact, where such issues can be collectively addressed and each AHB is left to negotiate between the uncooperative agencies of the state.

The Plan needs not only to address the disharmony on the specific issue of how the risk involved in design and build is to be managed and financed but also establish a functioning system in which such emerging disharmonies can be addressed. Such a functioning system needs to create space for the medium-sized and specialist AHBs as well as the small group of large AHBs.

Issues related to in-fill, conversion and re-instatement

⇒ ***Proposed action: AHBs should be eligible for Croí Cónaithe support where the future tenants are long-term residents in emergency homeless accommodation***

Focus Housing’s commitment to a programme of urban infill, conversion, and re-instatement, meets a number of Government objectives. Delivering this stream of additional social housing is not attractive to larger AHBs and is beyond the capacity of smaller AHBs, and so represents a unique contribution which Focus Housing can deliver. Such housing, which is usually near local

services, support, and public transport, is also ideal for the reintegration of people who have experienced homelessness.

However, initiatives for conversion of properties often struggle to be viable, particularly in the Dublin area where they are the most needed.

The best way of resolving the funding gap on these schemes would be to utilise an established scheme, Croí Cónaithe, and make AHBs eligible for support under this scheme where the housing units will be allocated to people who are long-term residents in emergency homeless accommodation (with a PASS-id), and ring-fenced for this purpose for as long as required.

⇒ ***Proposed Action: Establish a transparent mechanism for setting maximum costs of projects, which take into account savings on new infrastructure.***

The way in which the maximum cost or ‘ceiling’ for housing projects is set by the Department of Housing and local authorities lacks transparency and does not seem to reflect the realities of different sites or the costs of building apartments. The development of urban infill sites can involve particular costs arising from design limitations and construction challenges which do not apply in greenfield sites. This can push up construction costs for these sites, but should be balanced in a transparent manner with recognition of savings on externalities such as provision of utilities infrastructure, etc.

The lack of transparency in how ceilings are calculated creates a tension between Government objectives such as density and urban renewal, on the one hand, and cost-effectiveness, on the other. It also creates uncertainties for developers so that viable projects are not pursued or resources are wasted on projects that are belatedly deemed too costly.

Issues related to ‘second-hand acquisitions’ and scatter-site housing

⇒ ***Proposed Action: The new Plan must include sufficient provision for second hand acquisitions where pepper-potting is essential for the programme (Housing First, disability, ageing, care leavers housing, mental health).***

One of the factors that contributed to ‘Housing For All’ failing to reduce the level of homelessness was its failure to recognise the importance of one-off second-hand acquisitions in programmes that tackle homelessness. This arises from an exclusive attention to the question of increasing housing supply, and a lack of attention to the question of how new and existing housing supply is used- which is critical to tackling homelessness.

In the last two decades, a number of models have emerged in which people who are homeless and have complex support needs are accommodated in ordinary homes that are ‘pepper-potted’ among the homes of other members of the community, where they are provided with various forms and intensities of support to help them sustain their tenancy and integrate into the community. Focus Ireland has been pursuing this approach through its Focus Housing arm for over twenty years and now owns over 1,000 such ‘scatter-site’ or ‘pepper-pot’ homes, - where floating support is provided, funded either by local authorities or from public fundraising. The Housing First model, which Ireland adopted over ten years ago, and now provides homes and support for over 1,000 formerly homeless people, is a particularly high-intensity version of this approach.

‘Housing for All’ restricted the total number of single units that could be purchased to 200 per year until 2026. This very low ceiling must accommodate not only a programme to tackle

homelessness, but also all the other categories of need (disability, ageing) which also seek to employ a scatter-site model. The Government circular in March 2025 (Circular 11/2025), restricts funding for these acquisitions that most local authorities will not be able to purchase any scatter-site accommodation until 2026.

The Programme for Government commits to increasing the number of Housing First tenancies by 2,000. The current model of rolling out Housing First contracts to homeless NGOs makes it an obligation of the NGO to provide a proportion of the homes needed by Housing First tenants, and the main mechanism for doing so has been second-hand acquisitions.

This is another example where one stated goal of Government (the provision of Housing First tenancies by NGOs providing scatter-site housing) is thwarted by another policy (severe limits on scatter-site acquisitions).

Focus Ireland supports the core policy objective of the limitation on second-hand acquisitions to direct activity towards new construction, however, since it is clearly impossible to construct ‘scatter-site housing’ in established communities, adequate provision must be made for its purchase if the Government’s goals on Housing First and homelessness in general are to be met.

Issues related to the Capital Assistance Scheme (CAS)

⇒ ***Proposed Action: Reform the CAS funding model so that it reflects the level of shared costs in modern apartment developments***

The primary mechanism for funding housing for ‘special needs’ groups, including people moving out of homelessness, is the CAS programme. Unfortunately, a range of problems with CAS, which have been evident for several years, have remained unaddressed.

In relation to second-hand acquisitions, as discussed above, the primary problem with CAS is that the financing and rental model does not take into account the fact that all modern apartments require fees to be paid to management companies for common areas and other facilities. Formerly homeless tenants are unable to pay these fees in addition to their rent, and they cannot be recouped from the welfare system. Where the AHB takes on the management fees, the purchase become financially unviable, so in pursuing this model of providing housing for tenants with special needs, the State is inviting AHBs to go down a pathway which will inevitably result in them being unable to fulfil their regulatory responsibilities.

These problems have been known for many years, and an ongoing ‘review’ has been referred to by the Department of Housing for most of this period, with no outcome ever emerging.

Similar challenges relate to the use of CAS for construction projects, including the phasing of funding supports, access to forward financing and the funding of shared and community spaces.

The new plan should either resolve or set a short timeframe for resolving the problems in CAS which limit its capacity to deliver on housing objectives for people with special needs.

- ⇒ ***Proposed Action: Restructure Tusla CAS as a ‘Secure starter home’ or ‘Sábháilte’ programme, drawing funds from both CAS and CALF with clearer remit and targets***

The Tusla CAS scheme, in which a proportion of the CAS budget is ring-fenced to acquire homes for young people leaving care who would otherwise become homeless, has the potential to transform Ireland’s historic and continued neglect of care-leavers. However, the scheme has never fulfilled its potential and delivery remains stubbornly low. Problems related to the scheme come from a variety of sources, as [outlined in a Department of Children evaluation](#), including the restrictive approach to second-hand acquisitions discussed above but also its lack of priority in relation to other programmes, such as acquisitions for Housing First. The scheme is also poorly understood in local authorities and has never been promoted by the Department of Housing, and is not even mentioned in the National Youth Homeless Strategy.

Focus Ireland argues that the scheme should be restructured as a ‘Homes for Care leavers’ programme, with a capacity to draw from both CALF and CAS funding, targets should be set for housing delivery, in collaboration with Tusla, based on annual projections of vulnerable young people leaving care. Targets should be integrated in the overall targets agreed between local authorities and the Department of Housing.

4. Private Rental Sector

- ⇒ ***Proposed Action: Commit to phasing out the long-term subsidization of households in the private rented sector***
- ⇒ ***Proposed Action: Clearly state the Government’s position on the future of HAP and how it relates to rent pressure zones***
- ⇒ ***Proposed Action: Increase the maximum rent limit on HAP properties to realistically reflect increases in market rents over the last 8 years.***
- ⇒ ***Proposed Action: Increase Homeless HAP rates to overcome the barriers faced by households moving out of homelessness.***
- ⇒ ***Proposed Action: Forecast the true housing need and supply needed to inform a strategic plan on the phasing out of HAP as a long-term housing option. All households using rental subsidies that qualify for social housing should henceforth be included in the Social Housing Needs Assessment, so Local Authorities and Government can factor these households into their build programmes.***

While most of our recommendations to the new Housing Plan concentrate on social housing and homelessness, it is imperative that we highlight the main issue in the Private Rented Sector related to homelessness that needs to be addressed in the new Plan - the use of the PRS as quasi-social housing.

The large-scale subsidisation of low-income households reliant on the private rented market is having the dual negative impact of:

- placing an estimated 100,000 households who use state supports to rent at increased risk of poverty and insecurity compared to both other private renters and households in local authority housing
- removing almost all of the most affordable private rental accommodation from the market, placing upward pressure on rent prices, and placing a particularly heavy burden on households who are slightly over the threshold for social housing.

Subsequent housing strategies have failed to address the fundamental issues in the PRS and to set out a vision for the sector. The previous Government began developing a strategy for the sector in 2022, which should have provided policy and legislative clarity for both tenants and landlords going forward, but this was watered down to a review of the sector and did not set out a vision of where this sector should go and the Government's role in it. Unfortunately, the state of the PRS has only declined since we wrote our original submission to the PRS strategy, which can [be read in full here](#).

The State's reliance on the private rental sector to accommodate large numbers of its most vulnerable citizens is an inevitable outcome of inadequate State investment in social housing over several decades. While we acknowledge the role that Housing Assistance Payment (HAP) played assisting households exiting homelessness to private rented accommodation when almost no new social homes were being built, Focus Ireland has long maintained that there is an overreliance on the private rental sector and that it is not an appropriate social housing solution for many households.

The previous Government expressed a desire to move away from subsidising households to rent privately and to build new social homes instead. However, in reality, this aspiration was passive and *Housing for All* did not explore how it can fulfil the goal to move away from relying on private landlords to provide social housing, develop a plan to achieve this, and to ensure that new build social housing targets are linked to a phasing out of the use of private rental subsidies to provide long-term housing.

5. Homelessness overview

This section sets out what Focus Ireland believes should be some of the overarching themes and approaches in the homelessness section of the new plan. We then explore in the final three sections the specific measures which we believe will support prevention of homelessness, supports for people while they are homeless, and sustained exits from homelessness.

Enhance Collaboration on Homelessness

- ⇒ ***Proposed Action: Establish structures at a local and national level to develop a collaborative, problem-solving approach to tackling homelessness across all State and NGO partners***
- ⇒ ***Proposed Action: Implement Housing Commission Action 68 to 'Integrate and coordinate cross-departmental service plans, budgets and strategies on homelessness. Integrate housing and homelessness plans, funding and strategies to ensure a consistent whole-of-government approach.'***

Reducing – and ultimately ending – homelessness requires the active collaboration of a wide range of state agencies and NGOs. As demonstrated in the Focus Ireland commissioned independent review of Irish homeless strategies “[From Rebuilding Ireland to Housing for All](#)”,

alignment and effective working relationships between the wide range of organisations is best achieved, and most effective, through processes of collaboration. At present, some collaborative structures exist, such as the National Homeless Action Committee and local consultative forums, but their potential has not been realised, and they do not operate within a framework of shared objective-setting and problem solving.

The new Housing and Homelessness Plan should mark a shift towards a new collaborative approach, and set out the appropriate structures at Cabinet, Departmental, inter-Departmental, regional, and local levels to mobilise this approach.

Move from ‘passive’ to ‘active’ expenditure

⇒ ***Proposed Action: Create a model for recording funding on homelessness which distinguishes between ‘active’ and ‘passive’ measures, and shift resources to ‘active’ measures over time.***

Focus Ireland [has argued for adoption of a budgetary framework](#) for homeless funding which distinguishes between ‘passive measures’ which address the immediate circumstances of people who are experiencing homeless and ‘active measures’ which contribute to ending the problem by preventing homelessness or supporting a person into a sustainable tenancy. The budgetary framework for this approach should be wider than Section 10 funding and incorporate Tusla and the HSE, to reimburse Local Government spending with a view to creating an integrated all-Government approach to tackling homelessness. This framework would help drive a programme of shifting funding from passive to active measures, driving solutions to the problem.

Develop a shared framework for assessing support need

⇒ ***Proposed Action Establish a shared framework across all stakeholders for assessing the level of support need required by homeless households***

While there is a broad recognition that some homeless households have greater support needs than others, there is no agreed framework across the local authorities for assessing the level of need, and the consequent resource requirements. Some local authorities set out their understanding of the different categories of support need in their SLAs with service providers; for instance, the DRHE has four categories of need, but there is little consistency across local authorities or in application of these. A mechanism for operationalising a shared framework exists through the PASS requirement to complete and record a comprehensive needs assessment but the full potential of this is not being utilised.

Outside of Section 10 homeless services, shared models of assessment have been adopted ensuring more effective resource deployment and collaboration between the service providers and commissioners. The best example of this may be [the Hardiker model](#), which has been adopted by Tusla (The Child and Family Agency) as an assessment framework that analyses needs and services at different levels. Most agencies funded by and working with Tusla have adopted the same model, establishing a shared common framework for discussions on needs and strategic approaches to meeting those needs. Hardiker is particularly useful for understanding and addressing the needs of children and young people, but its approach would provide the basis for a shared framework which includes adult-only households.

Set the goal of making sure no one is homeless for longer than 6 months by the end of the next Government term (2030)

⇒ ***Proposed Action: Align these actions with Housing Commission Action 70 to ‘Implement the Lisbon Declaration in relation to addressing homelessness’ and Action 68 to ‘Gather data on the causes of homelessness and the effectiveness of interventions to address homelessness.’***

More people are spending longer periods in emergency accommodation, unable to exit due to a shrinking affordable rental market and a lack of social housing to facilitate exits. Data shows that there has been no consistent increase in the number of households becoming newly homeless. Rather, the rise in the numbers stuck in emergency accommodation is explained by a steady stream of newly homeless households and a declining rate of households finding their way out.¹

As of March 2025, there were 5,514 households who had been homeless for over 6 months (4,017 adult-only households and 1,497 families). By targeting resources at tackling long-term homelessness, we will move from a position where it is common for households to spend years in emergency accommodation to a situation where households are homeless for a short period of time before their needs are met. In Housing First, this is referred to as Functional Zero, a concept in which a population has the equivalent housing and supports available to meet the needs of the people who become homeless at any given point in time.

To this end, ending long-term homelessness would mean that homelessness is confined to a temporary situation which is resolved quickly and is not repeated. Through efficiently targeting housing supports and resources at the most vulnerable groups trapped in emergency accommodation for long periods with often complex circumstances, we could end the phenomenon of long-term homelessness in Ireland by 2030. This submission lays out a range of proposals that the new National Housing Plan can promote to achieve this goal.

Tackling homelessness through cooperation at European Union level

⇒ ***Proposed Action: Continue active engagement in EU level initiatives to improve effectiveness of policies to tackle homelessness, and support a Council of Ministers declaration on homelessness.***

The Department of Housing has been an active participant in the EPOCH (European Platform on Combatting Homelessness) which emerged from the Lisbon Declaration. Other relevant EU initiative have also emerged, such as the European Parliament Housing Committee, EU permission to reallocate structural funds money to housing for marginalised groups and the EU Homeless Count Project. These EU level programmes can never replace the need for national and local level solutions, but they can provide valuable spaces for shared learning, development of best practice and, in some cases, access to resources.

Ireland will hold the Presidency of the European Union, as part of the regular rotation from July to December 2026, and is in a strong position to further EU work in this area, in particular by

¹ O’Sullivan, E., Byrne, E., and Allen, M. (2024) [Focus on Homelessness: A decade of homelessness data: Significant developments in homelessness 2014–2023](#). Dublin, Focus Ireland

facilitating a European Council of Ministers' declaration on the EU's role in supporting measures to end homelessness.

Commit to the development of a second youth homelessness strategy to begin in 2026 with a focus on prevention

⇒ ***Proposed Action: Commit to a new prevention-focused Youth Homeless Strategy, and commit in principle to mainstreaming the SHY pilot programme.***

As of March 2025, 1,798 young people aged 18–24 were living in emergency accommodation, highlighting the scale and urgency of youth homelessness in Ireland. The current National Youth Homelessness Strategy (2023-2025) is set to conclude at the end of this year, and while the Programme for Government 2025 includes a welcome commitment to its full implementation, a new phase of action is now required.

As part of the full implementation of the current strategy, the new Housing and Homelessness Plan should commit in principle to mainstreaming the SHY beyond the pilot phase, incorporating the lessons from the project evaluation. In addition, the Pilot needs to be extended to reflect the delayed start date. The Pilot was initially envisioned to begin in Q3 2023, but, due to unforeseen delays, the first tenants did not move into their homes until June 2024. The pilot should be extended accordingly to ensure sufficient time is allowed to evaluate the impact of the pilot on the lives of the young people involved and reflect that in a mainstreamed programme for young people at risk of homelessness.

The Government must commit to a timeframe for agreeing a second, ambitious Youth Homelessness Strategy with a dedicated budget and a clear objective to end youth homelessness. This new strategy should build on the learnings from the last three years and place a specific focus on ending youth homelessness by preventing a new generation of young people from ever becoming homeless. The new Strategy must continue to address the distinct needs of key vulnerable groups, including care leavers, prison leavers, members of the Traveller community, LGBTQ+ youth, young parents, and young people with disabilities. It must also explicitly recognise the experiences of young migrants.

As a member of the Irish Coalition to End Youth Homelessness, Focus Ireland is committed to working collaboratively with Government and all relevant stakeholders to help shape a second strategy with a specific focus on prevention and long-term solutions.

Respond to the specific causes and challenges of family homelessness

⇒ ***Proposed Action: Commit to a dedicated child-focused set of policies and initiatives to respond to the specific causes and challenges of family homelessness***

⇒ ***Proposed Action: Implement specific measures to end child homelessness in line with Housing Commission Action 69 as part of this process***

Although family homelessness has grown from around 200 families in 2013 to over 2,200 families in 2025, it has largely been ignored in Government the housing and homelessness strategies over that period, 'Rebuilding Ireland' and 'Housing for All'. The particular challenges faced by children who are homeless with their families have been the subject of no Government

initiative, programme or written policy. Focus Ireland is the leading organisation working with homeless families and have repeatedly drawn attention to the need to address the specific drivers of family homelessness, and to introduce dedicated supports to minimise the harm done to children who experience homelessness. Instead an entirely crisis-driven reactive response has resulted in family homelessness being much higher than it might otherwise have been, but also harm being done to the life chances of children that could well have been avoided.

With family homelessness at a new record high, it is essential that the forthcoming Housing and Homelessness Plan, sets out a commitment to agree a dedicated child-focused set of policies and initiatives to respond to the specific causes and challenges of family homelessness. A number of elements in such an approach, such as providing a legal requirement to consider the best interests of the child, are drawn out later in the submission.

Inclusion of people ‘with status’ and trapped in Direct Provision accommodation in measures to tackle homelessness and in projections of housing need

In February 2025, it was reported that the International Protection Accommodation Service (IPAS) was accommodating nearly 33,000 people, with around 5,400 people having been granted refugee status or permission to remain in Ireland. Despite their legal status, these 5,400 individuals have no alternative but to remain in Direct Provision due to the chronic shortage of suitable and affordable housing. The deeply silo-ed nature of Irish Government has resulted in this group of people, who have broadly the same rights and face the same challenges as people in Section 10 funded homeless accommodation, being largely ignored in housing and homeless planning.

The new Housing Plan must recognise these individuals and families as part of the housing and homelessness challenge that we face. If the Department of Justice continues with the policy of terminating their accommodation in IPAS centres, a joined-up policy must be agreed between the two parts of the state for a transfer to the homeless system with minimum disruption and trauma. Housing targets need to take account of this group of people and they need to be provided with a clear path into housing as part of a programme to end all forms of homelessness.

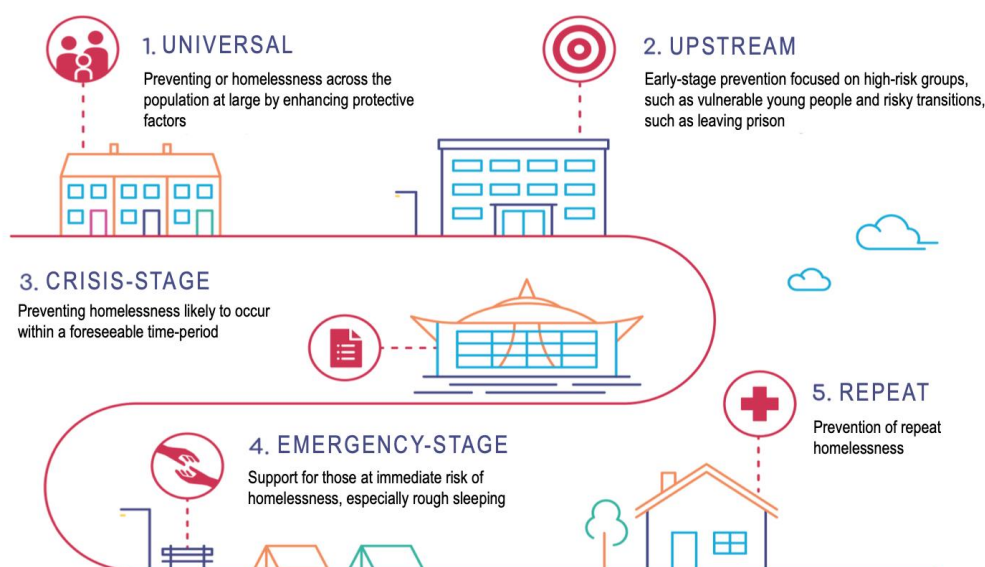
6. Homelessness: Prevention

⇒ ***Proposed Action: Commit to developing a stand-alone Homeless Prevention Strategy, involving all statutory and NGO stakeholders informed by the OECD toolkit by Q3 2025***

The Programme for Government commits to “Ensure a holistic, cross departmental approach to homelessness prevention”. This is a welcome commitment but, in line with the comments above, is complex and involves many agencies and departments, so is unlikely to be fully realised in the timeframe available for publication of the new Housing Plan.

Rather than settle for a too rapidly assembled prevention strategy, Focus Ireland favours a strong commitment to develop such a strategy within the timeframe of Q3 2025, with a commitment to reflect any necessary budgetary requirements in Budget 2026. The OECD toolkit

on tackling homelessness should be used for developing this plan and it should adopt the [Fitzpatrick/Mackie framework for homeless prevention \(below\)](#).



The Homeless Prevention Strategy should include the range of Departments and Agencies whose services or programmes can result in flows into homelessness including: Tusla state care services, the criminal justice system, psychiatric and general hospitals, schools and asylum-seeker services.

Ensure that any changes to RPZ rent regulation continues to protect tenants from unaffordable rent increases

⇒ **Proposed action: Link any new rent regulation system with the level of HAP and other rent subsidies.**

The review of RPZs initiated earlier in the year and the subject of a review by the Housing Agency should be addressed in the context of the new Plan and not as a stand-alone measure. In addition to the technical question of how to develop rent regulation measures which more consistently balance the needs of tenants and landlords, any changes to the current system must also address the fact that rent allowances to low-income tenants (HAP, RS and RAS) have now fallen far significantly behind market rents. Any mechanism to allow landlords to introduce rent increases must be linked to a mechanism which reflects this increase in the level of any rent subsidy.

Ensure that HAP tenants avoid evictions into homelessness due to minimal arrears

⇒ **Proposed Action: Align rent arrears arrangements for HAP tenants with those for social housing tenants to avoid evictions into homelessness due to minimal arrears.**

Rent arrears is a growing problem in HAP and HHAP tenancies, driven primarily by ‘top-ups’ to landlords. The policy for dealing with arrears is much harsher than the one that applies to other

social housing tenants. This is resulting in avoidable evictions, returns to homelessness and disaffected landlords.

The recent EU SILC 2024 clearly shows that housing support payments are placing households at a greater risk of poverty. Households in receipt of HAP had an 'at risk of poverty rate' of 21.5% before housing costs but this increased by more than doubles to 57.3% after they paid their housing costs. Households renting with social housing supports, the majority of which rent with HAP, are at a higher risk of poverty than any other groups after rent is paid. This increases the risk of these households falling into arrears and losing their homes.

As a homeless prevention measure, HAP should be reformed so that all HAP recipients are treated fairly and subject to the same rules as other social housing tenants. They should have a secure home and have an adequate income after they pay their housing costs.

As well as ensuring that HAP tenants who fall behind with their differential rent should be treated in the same way as other social housing tenants and not subjected to unfeasible repayment plans, Local authorities should ensure that the principle that no households should fall below an absolute minimum level of income after paying for their accommodation (as set out in Social Welfare Consolidation Act 2005) is applied to HAP households. In addition, no household should pay more than 30% of their net income on housing costs. Where legally allowable rent increases cause these safeguards to be breached, HAP subsidies should be increased. Furthermore, Local authorities should establish clear, accessible and transparent process to review HAP payments, in line with the 2021 Report from the Ombudsman.

Reinstate the Tenant in Situ scheme as a safety-net for those at immediate risk of homelessness

⇒ ***Proposed Action: Reinstate the budget for Tenant-in-Situ purchases where a tenant is at a significant risk of homelessness because of a no-fault eviction.***

Focus Ireland has expressed significant concern over recent changes to the Tenant-in-Situ (TiS) scheme, which has been a crucial tool in preventing families and individuals from becoming homeless since the end of the eviction ban in Spring 2023. The TiS scheme was introduced as a safety net when the government decided not to extend the moratorium on 'no fault evictions,' which had raised widespread concerns about rising homelessness. Despite its limitations, the TiS scheme has successfully prevented many tenants from becoming homeless, saving the Department significant costs in emergency accommodation.

We fear these recent changes will make the scheme so impractical that it will lead to a substantial increase in homelessness. The scheme will be much less attractive for landlords, who do not benefit financially from selling to local authorities compared to the open market. The new guidelines seem to treat the scheme as a 'last resort,' making the process longer and less appealing for landlords. This shift in policy suggests a preference for vacant-possession sales over protecting existing tenants, which could undermine the scheme's effectiveness and increase homelessness. The failure to renew the scheme in November 2024 has resulted in the already inadequate budget for 2025 being already committed by Q1 in most major local authority areas.

Behind this recent decision, it appears that Government has a pre-occupation with balancing the interests of tenants at risk of homelessness against the interests of households that would become owner-occupiers by purchasing from departing landlords. The new proposals and shift

that balance entirely away from concern about homelessness and effectively withdraws the ‘safety net’ put in place by the previous Government in favour of purchasers.

Given the significant challenges in delivering new social housing, the Government should reintroduce and adequately fund the Tenant-in-Situ scheme as part of its new Housing Plan, so that every household that qualifies under the scheme can avail of its protection over the full year.

Evaluate existing preventative measures

⇒ ***Proposed action: Commission an evaluation of the successful DRHE prevention initiatives with a view to scaling up to a nation-wide programme***

For several years, DRHE has reported impressive success rates with a range of ‘rapid rehousing measures’ which prevent homelessness. These include early access to HHAP supports for households facing eviction as well as methods to increase allocations to social housing for eligible households. Despite this success, no effort has been made to evaluate and document the approaches taken with a view to making the measures more effective and supporting their adoption by other local authorities across the country. This is a lost opportunity to learn from and scale up one of the few successes in homeless policy in recent years.

7. Homelessness: Protection of people while they remain homeless.

Ensure all emergency accommodation complies with the National Quality Standards Framework

⇒ ***Proposed Action: Provide all Local Authorities with funding and training to ensure a system of regular,, unscheduled inspections of emergency accommodations is introduced to ensure all EA is compliant with the National Quality Standards Framework***

⇒ ***Proposed Action: Local Authorities should ensure that all staff, including staff in PEA, should be trained to better understand and respond to the traumatic experience of homelessness, and should be required to undergo training to overcome cultural and religious bias.***

The National Quality Standards Framework was a welcome step forward in establishing consistency in how persons experiencing homelessness are responded to across different regions and models of service delivery and we welcome the use of the National Quality Standards Framework (NQSF) now applying to Private Emergency Accommodation.

While recognising the developments in this area, Focus Ireland’s recent ‘Insights into Family Homelessness’² raised some serious concerns about the quality of the emergency accommodation provided to families homeless in Dublin including cramped living conditions, a lack of privacy and safety, unsanitary conditions for very vulnerable children, as well as discriminatory and demeaning treatment from some staff. While the sample size for this study

² O’Donnell, L. , Slein, A. and Hoey, D. (2024) [Insights into Family Homelessness in Dublin during 2022 and 2023](#). Dublin: Focus Ireland

was small, and did not claim to be representative of all families in EA, it is important to recognise the experiences of these families.

The current reactive complaint process needs to be underpinned by regular, unscheduled inspections of emergency accommodations to ensure all EA is compliant with standards and protect families and individuals from substandard living conditions in emergency accommodation.

Ensure local authorities prioritise the rights and needs of homeless children

⇒ ***Proposed Action: Include the 'Best Interest of the Child' in the Housing Misc Bill 2025***

The Housing Act (1988) in Ireland primarily considers the needs of a single homeless person and does not specifically address the needs of children. This legislation has not been updated to reflect the Thirty-first Amendment of the Constitution (Children) Act (2012), which emphasizes children's rights and the state's duty to protect them. Focus Ireland has long argued that adopting a 'Best Interest of the Child' approach would lead to better outcomes for children experiencing homelessness. Currently, local authorities conduct a Housing Needs Assessment for the parent or guardian, which includes counting the number of children but does not assess their individual needs. Focus Ireland believes that children, being particularly vulnerable after losing their homes, should have their needs individually assessed, considering factors like access to education, medical support, and maintaining relationships with their wider family network.

In 2017, the Labour Party introduced the Housing (Homeless Families) Bill, which aimed to recognise families as units, prioritize children's best interests, and provide safe accommodation to support family functioning and child welfare.

Although the Bill has had broad political support, it was not passed due to a change in Government. We believe that the new Housing Plan presents an opportunity for Government to commitment to incorporating the contents of the Housing (Homeless Families) Bill into the Housing Misc Bill 2025 to ensure that children's needs are central to decision-making and that families have access to safe accommodation.

Improve the transparency of access to homeless services and social housing waiting lists

⇒ ***Proposed Action: Introduce and adequately resource an independent appeals system for emergency accommodation and social housing access***

In May 2024, the Joint Committee on Housing, Local Government and Heritage published its recommendations for amendments to the draft Housing (Miscellaneous Provisions) Bill 2024, including the recommendation that a robust and independent appeals mechanism be included in the legislation. The Department of Housing's support in principle at the time for an appeals system was welcome and to support the advancement of a new system, the Irish Homeless Policy Group, a broad coalition of organisations concerned with homeless and housing policy, prepared a discussion document which sets out matters relevant to an informed dialogue

regarding the establishment of an independent appeals mechanism. This discussion document is attached to this submission for further consideration.

Reform the 'Local Connection' rule to ensure fair access to social housing and emergency accommodation.

⇒ ***Proposed Action: Ensure best interests of the homeless households is prioritised over a connection to a particular region when Local Authorities respond to requests for homeless assistance***

Focus Ireland, in common with most independent legal opinion, believes the local connection provisions should be read in relation to access to social housing lists and that local authorities are wrong to use this rule when responding to requests for homeless assistance and 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. Furthermore, a protocol developed by the CCMA Homeless Regional Leads in July 2023, has further led to the harmful use of the 'local connection' rule being used as a mechanism to apportion responsibility and cost within the local government system.

Government needs to clearly abolish and replace this requirement and develop a new mechanism that responds to requests for homeless assistance in the best interests of the homeless individual. Focus Ireland believes that the new Housing Plan is an appropriate place to set out a road map for reform in this area.

Ensure that appropriate emergency accommodation is provided for all rough sleepers regardless of legal status.

⇒ ***Proposed Action: Ensure that there are sufficient emergency beds so that no one ever has to rough sleep. In particular, ensure that everyone who seeks international protection in Ireland is provided with suitable accommodation while their claim is being assessed, regardless of nationality, gender, or legal status.***

To date, Irish policy in relation to homelessness has been heavily shaped by the objective that no one should have to sleep rough. This has been the objective of Government strategies under several administrations and the Dáil has been frequently reassured that a bed has been offered to anyone who needed it. This public policy has been strongly supported by public opinion and there has been a strong public aversion to seeing fellow human beings forced to sleep rough. This has resulted, over several decades, in levels of rough sleeping which, while regrettable and avoidable, are lower than most comparable cities. Of late, this situation has been suddenly reversed and the large number of visibly destitute people sleeping with or without tents right across the city is entirely unprecedented.

Focus Ireland we are acutely aware of the pressures on both the IPAS and homeless systems, but there can be no acceptance of the failure to provide shelter for any person regardless of nationality, gender or status.

It is very clear that IPAS alone is unable to deal with the scale of the situation and a coordinated Government response is essential. The new Plan should commit to establishing a cross departmental task group including the Department of Housing, Local Authorities, the Department of Justice and the HSE with the remit of, not only assuring long-term solutions to these issues, but ensuring that shelter is provided to everyone who needs it, including those in International Protection.

Ensure that every child in homelessness should have timely access to a Child Support Worker

⇒ ***Proposed Action: Build on the Programme for Government commitment to provide special supports for children impacted by homelessness by funding child support workers.***

In the last 4 years, the number of homeless children has doubled. We know from evidence-based research on childhood trauma and adverse childhood experiences that becoming homeless as a child is deeply traumatic. It is well-documented that the impact of homelessness carries many negative consequences for the physical, psychological, and emotional development of children which can have lifelong effects. We believe that the needs of every homeless child should be assessed, including factors such as access to their school, medical and therapeutic needs, and how to support family relationships.

Focus Ireland has long argued that every child in homelessness who needs one should have timely access to a Child Support Worker, to work 1:1 with children addressing their needs and minimising the trauma of homelessness. Children and parents consulted by the Ombudsman for Children's Office 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 parents. This enables parents to engage much more fully both with supporting their children through a traumatic experience, as well as on the process of exiting homelessness. 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.

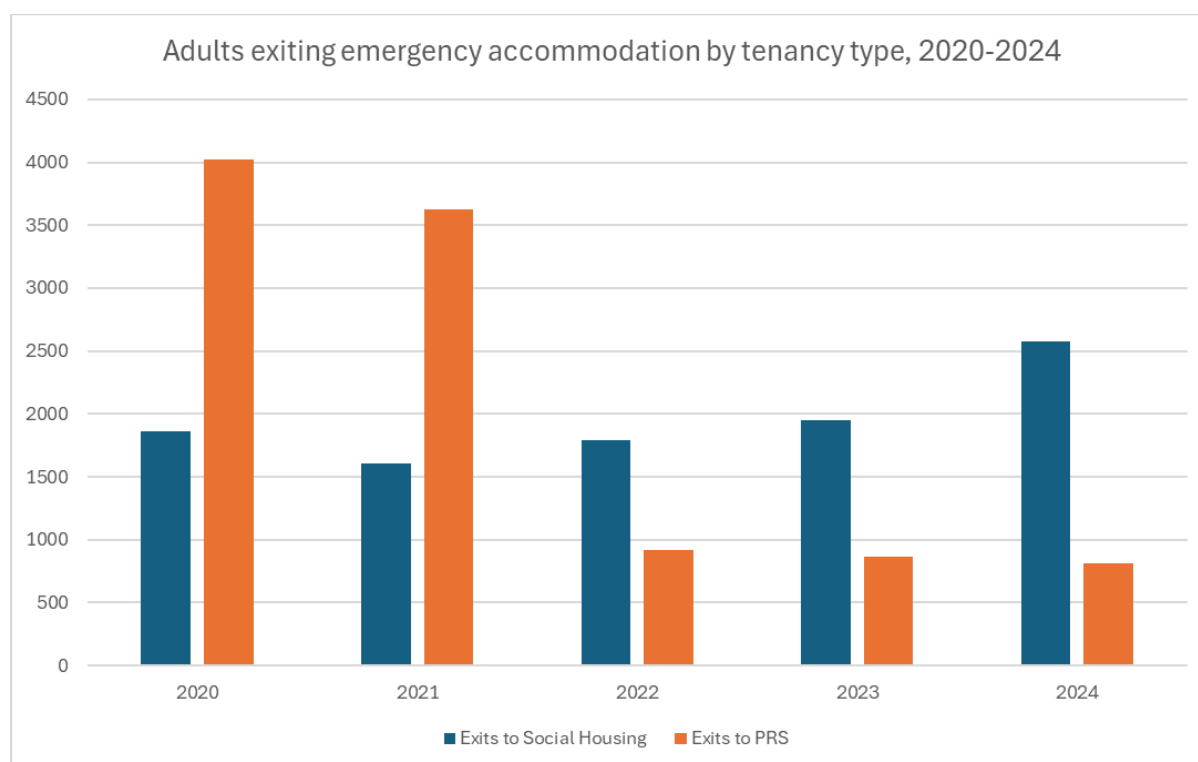
8. Homelessness: Progression out of homelessness

Households exit from homelessness through two main routes: (i) obtaining a tenancy in the private rental sector, usually with some form of rent subsidy (HAP, RAS or RS) or (ii) being allocated a social housing tenancy by their local authority, either with an AHB or in the council's own stock.

In the past, exits to the private rental sector played a crucial role in exits from homelessness – not just because of the numbers exiting to that tenure but because this provided a route out of homelessness for people who were either far back in the social housing list, not eligible for

social housing or needed the sort of homes that are in short supply in social housing. HAP played a crucial role of enabling exits from homelessness at a time when there was very little new build social housing. HAP was the primary exit vehicle from homelessness between 2016-2021, making up between 60-70% of exits during this period.

In recent years, due to the problems in the lower end of the private rental sector, this route out of homelessness has been greatly reduced. As increased supplies of social housing have become available, there has been an increased rate of exit through that route but, despite the substantial increase in social housing supply over recent years, the increased opportunities through this route have not compensated for the lost opportunities in the private rental sector. In 2020, 5,886 adults exited homelessness, compared to 3,394 in 2024, this reduction is exclusively because of the lack of PRS exit options.



This changing pattern of exits, as shown in the graph above, has not only resulted in an overall increase in the number of households that are homeless but in the type of households that would have traditionally relied on exiting homelessness into the private rental sector remaining homeless for longer. This is particularly true in the Dublin Region, which – because of the length of time that people remain homeless in the capital - accounts for only about half the number of people who have become homeless over the last ten years but for over 70% of the total who are currently homeless.

Welcome though this substantial increase in social homes over recent years supply is, it has not translated into a decline in either overall homelessness or long-term homelessness. In fact, as Government data highlights, homelessness has increased remorselessly virtually every month since the end of the pandemic. Our Decade of Homelessness data report³, published in June 2024, highlights that the rise in the numbers stuck in emergency accommodation is now a result

³ O'Sullivan, E., Byrne, E., and Allen, M. (2024) [Focus on Homelessness: A decade of homelessness data: Significant developments in homelessness 2014–2023](#). Dublin, Focus Ireland

of a substantial increase in the number of households becoming newly homeless, rather it is explained by a steady stream of newly homeless households and a declining rate of households finding their way out.

To reduce the number of households in emergency accommodation, action needs to be taken on improving exits pathways rather. The transition of households from homelessness into the housing system is not a simple issue of supply and demand but is mediated by a range of different factors and shaped by specific policies. Thus far, these policies have not been designed to maximise the impact of housing supply on homelessness but rather to meet a number of different policy goals appropriate to different periods and different objectives. To solve long-term homelessness, we need a specific and targeted approach. From the perspective of homelessness, however, consideration of the international and national evidence suggests that further increases in social housing supply, while necessary, will not, on their own lead to significant declines in the level of homelessness or in the average duration of homelessness in the foreseeable future.

In Section 1 on this submission, we go into detail on the steps that need to be taken in the new Housing Plan to better align increased social housing supply with reducing homelessness. Rather than repeat the proposed actions in this section, we instead have chosen to highlight actions that need to be taken on support services and the private rented sector in the new Housing Plan to increase exits from homelessness.

Introduce new measures to increase sustainable access to private rental housing for households stuck in emergency accommodation

⇒ ***Proposed Action: Increase of level of Homeless HAP and expand this support outside of Dublin to re-establish its relative competitiveness in the market and support households stuck in long-term homelessness to exit emergency accommodation***

The private rental sector has been used as quasi-social housing in the face of housing policy failure since the financial crash. By doing so, the State's use of the private rental housing has in many ways caused the current crisis we see in the private rented sector. We must return as much of this housing back to its original use as possible and directly build the social housing required to meet the long-term housing needs of low-income households. A core response to this challenge must be to increase the number of allocations to social housing as the amount of new social housing becomes available, but access to the private rental sector will always remain a key route out of homelessness for many people, as discussed above.

A commitment to 'reducing reliance on HAP' and ultimately phasing it out should not stand in the way of the reforms required to make it more effective in the immediate term. They are rather a regrettable but necessary requirement to support the households currently renting using subsidies. The 'discretionary' increase in the maximum rent limits on HAP announced in 2022 had very little impact on hard-pressed tenants as the Department of Housing made minimal effort to inform tenants of the measure and the application process was off-putting; wider, systematic rather than discretionary changes are required.

In the short-term, urgent reforms to private rental subsidies are necessary so vulnerable households eligible for social housing are adequately supported while they are accommodated in the private rental sector. While the decline in homeless exits to the private rental sector since

early 2022 partially reflects the overall challenges within the sector, it also reflects the relative loss of impact of the additional subsidies related to Homeless HAP. The higher level of rents which can be covered under Homeless HAP (HHAP) is designed to compensate for the disadvantages that homeless households experience in the rental market and allow them to compete successfully in a competitive market. In this regard, the relative decline in the effectiveness of HHAP can be seen as a reduced commitment to tackling homelessness, as judged against other pressing and important priorities. Unless the levels of HHAP are increased to re-establish its relative competitiveness in the market, homelessness will continue to rise and many people who are not currently eligible for social housing will remain homeless for many years.

⇒ ***Proposed Action: develop a new Homeless RAS programme closely targeted at families trapped in homelessness for long periods where private rental market is the only feasible route out.***

For a number of long-term homeless families, getting an allocation to social housing is not a feasible prospect for several years. Some of these families only registered for social housing when they became homeless, so are low down on the list, or are not eligible for social housing for a variety of very different reasons, including their migration status, the number of children or exclusions due to estate management issues. Many of these families also find it difficult to rent a home in the private rental sector due to discrimination or just that landlords see other prospective tenants as a safer option.

There is a strong case for reviewing social housing allocation rules in some of these specific cases, but in the absence of this their only route out of homelessness will be to the private rental sector, so it is essential to create a scheme, targeted at these families, which engages a group of landlords who are willing to provide tenancies for this group.

The Rental Accommodation Scheme (RAS) provides a better basis for such a programme because it establishes a more collaborative relationship between the local authority, the landlord and the tenant (and any homeless organisation that may be involved in support.) It also provides a more secure tenancy as, if the landlord decides to leave the market and evict the tenant, the local authority takes responsibility for finding the family a new tenancy.

There is scope for creating a Homeless RAS programme which would have payment thresholds which reflect real market competition but would not have the effect of pushing up overall rents because of being narrowly targeted on a relatively small number of hard-to-place families. If narrowly concentrated on this group, such a scheme would also be cost effective as without it the family would be certain to remain in expensive emergency accommodation for many years.

Provide Case management for all adult-only households that are homeless to support exits

⇒ ***Proposed Action: Provide Local Authorities with sufficient funding to ensure every person who is homeless is provided with a dedicated case manager to support them to exit homelessness.***

Adult-only homelessness has been allowed to steadily increase in an almost straight line, year on year since 2014, we now have triple the number of homeless adult-only households than we

did just a decade ago. This trend of an almost constant rise in the number of adults without accompanying children in emergency accommodation (EA) is divergent to the fluctuations in family and child homelessness we have witnessed. What is even more striking is that single persons' homelessness has increased almost in a straight line for ten years: two changes in Government, six different Housing Ministers, the introduction and removal of many eviction bans, the collapse and recovery of housing construction, the launch of a successful, national Housing First programme.

How we are approaching adult-only homelessness is wrong and without urgently addressing this issue we will not make progress towards reducing homelessness. We have clear evidence that we need to radically rethink the way we are approaching adult-only homelessness, including how we treat the needs of these households right throughout our housing system.

Throughout this submission, we have proposed changes that need to be made to our social housing system, in particular a radical rethink on the size of homes being built, but as we have long argued, housing is not enough to support people to exit homelessness, and supports need to be made available to every person in emergency accommodation.

As the number of people in emergency accommodation has increased month on month, Private Emergency Accommodation (PEA) has been increasingly used to try meet this need. A consequence of the growth in PEA (which typically is an accommodation only service) is that a large proportion of adult-only households in homelessness do not have an active case manager and no one working on developing an exit plan from homelessness. While most people in homelessness are there for purely economic reasons, additional supports, the likes of which already exist for families, have the dual benefit of reducing the trauma of homelessness and focusing spending on 'active' measures to move individuals out of homelessness rather than spending on 'passive' measures like the provision of emergency accommodation.

The 'PACT' (Private Accommodation Case-management Team) operated by Focus Ireland, Coolmine, Anna Liffey and De Paul works with couples in Dublin with complex support needs but do not reach the threshold for Housing First. This model should be expanded to all adults in PEA, not just couples, and should be introduced across all Local Authorities not just those in Dublin.

The new Housing Plan must provide Local Authorities with sufficient funding to ensure every person who is homeless is provided with a case manager to support them to exit homelessness.

Provide enhanced tenancy sustainment supports to families with complex needs

⇒ ***Proposed Action: Recommit to Housing for All Action 3.18 to 'identify and provide enhanced tenancy sustainment supports to families experiencing long-term homelessness to help them exit from homelessness and maintain their homes' by piloting a multi-disciplinary team for families and put a funding mechanism and timeline in place to achieve this action.***

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. We estimate that 10–20% of families engaged in Focus Ireland services have more complex support needs⁴. The lack of these supports reduces the chances of these families making a sustained exit from homelessness and exacerbates their existing needs.

The challenges facing these families is recognized in ‘Housing for All’ which states: *‘One notable issue that is evident concerns the length of time that some families (many with support needs requiring a multi-agency approach) spend in emergency accommodation. We will work with Local Authorities and NGOs to identify families experiencing long-term homelessness that have complex support needs. Those that do will be provided with enhanced tenancy sustainment supports to help them exit homelessness and maintain their homes’*

Following this commitment in Housing for All, Focus Ireland commissioned a feasibility study into the potential, and challenges, of establishing ‘multi-disciplinary teams’, including clinical and therapeutic components, to support this group of vulnerable families. [The full report can be read here.](#)

The new Housing Plan must recommit to the *Housing for All* action to provide enhanced tenancy sustainment supports to families experiencing long-term homelessness to help them exit from homelessness and maintain their homes but go further than Housing for All by committing to piloting a multi-disciplinary team for families and put a funding mechanism and timeline in place to achieve this action.

Deliver on the new Housing First targets

⇒ ***Proposed action: Develop an implementation plan to deliver the challenging Programme for Government commitment to increase Housing First tenancies by 2,000.***

Focus Ireland welcomes the commitment in the Programme for Government to increase the number of Housing First tenancies by a further 2,000 homes, bringing the total number of Housing First tenancies to over 3,000, but recognizes that this is a very demanding target, particularly within the constraints of the current programme. The Housing and Homelessness Plan must address the challenges to delivering this commitment and set out how they are to be overcome. For the purposes of this submission, we want to draw attention four key issues, but as one of the leading providers of Homeless First services in Ireland we would welcome the opportunity to contribute to a deliver plan on this commitment, as would our colleagues in the Irish Housing First Platform.

- The Programme for Government commitment of an additional 2,000 HF tenancies will not be achievable within the current constraints on second-hand acquisitions, as discussed above. Delivery of the number of scatter-site, one-bedroom apartments to meet this target will require not only increased allocations into AHB and Local Authority stock, but a pro-active acquisition drive, which will require exemption from the second-hand acquisitions cap and an adequate budget.
- The commitment to increase HF tenancies provides an opportunity to broaden the household type that is eligible for Housing First. In particular, providing a HF strand for the relatively small number of families that have a similar level of support needs to the

⁴ Focus Ireland, (2023). [Multidisciplinary Team for Homeless Families Feasibility Study](#)

current single person in-take would contribute to Programme for Government commitments and outstanding Housing for All commitments. Similarly, developing a strand of HF designed for young people with a similar level of need, would provide a route for mainstreaming the current SHY pilot.

- [The Greenwood Evaluation](#) of Housing First services (2022) highlighted the challenge in retaining experienced Housing First support workers, and the crucial role that stable support worker/tenant relationships have in the programme. These staff retention challenges are common across the homeless sector, and indeed in the wider social care sector. However, the fact that these challenges are part of a wider sectoral challenges does not mean they can be ignored in the particular context of Housing First. Recent decisions at the WRC will go some way to dealing with the gap between homeless service care roles and care roles in the state sector, but this agreement provide a basis for developing solutions to the HF staff-retention issue rather than being a solution in itself. Any credible plan to increase HF tenancies to 3,000 tenants must include a considered and funded labour-force development plan.
- The Housing Commission draws attention to the lack of consistent integration of the HSE (both HSE Social integration and the mental health services) in the Housing First programme. The expansion of the Housing First programme as committed to in the Programme for Government must ensure full and consistent integration of essential health services into the Housing First programme.

Bibliography

Baptista, I., Culhane, D., Pleace, N. and O'Sullivan, E., 2022. [From Rebuilding Ireland to Housing for All:: International and Irish lessons for tackling homelessness.](#)

Focus Ireland, (2023). [Multidisciplinary Team for Homeless Families Feasibility Study](#) Dublin, Focus Ireland.

Focus Ireland, (2024). [Proposal to tackle long-term homelessness.](#)

Focus Ireland, (2023). [Submission to the Review of the Private Rented Sector](#)

Greenwood, R.M., Byrne, S. and O'Shaughnessy, B.R., 2022. [National Housing First Implementation Evaluation Findings.](#)

Norris, M. (2020) Department of Equality, Children, Disability, Integration and Youth '[Preventing Homelessness among Care Leavers: Review of the Capital Assistance Scheme for Care Leavers](#)'

O'Donnell, L . Stein, A. and Hoey, D. (2024) [Insights into Family Homelessness in Dublin during 2022 and 2023.](#) Dublin: Focus Ireland

OECD (2024), [OECD Toolkit to Combat Homelessness](#), OECD Publishing, Paris,

O'Sullivan, E., Byrne, E., and Allen, M. (2024) [Focus on Homelessness: A decade of homelessness data: Significant developments in homelessness 2014–2023.](#) Dublin, Focus Ireland