



Focus Ireland Submission to the Child and Family Homelessness Action Plan

February 2026

Introduction

Focus Ireland welcomes the opportunity to make a submission to inform the drafting of the Child and Family Homelessness Action Plan. Focus Ireland, as one of the lead organisations working with homeless families, in partnership with local authorities, Tusla and other agencies, has repeatedly drawn attention to the need for a strategic set of policies which address the specific drivers of family homelessness, and minimise the harm done to children who experience homelessness with their families¹.

Between June 2021 and June 2025, family homelessness in Ireland increased by 149%, while child homelessness increased by 128%.² This increase followed a period of declining family homelessness associated with measures introduced during the Covid pandemic, specifically tenant protections against ‘no-fault evictions’ and accelerated allocation of social housing³. The increase in the number of homeless families since 2022 has been accompanied by a significant increase in the number of families that are homeless for long periods, with the number of families homeless for over two years more than doubling in Dublin since 2023.

Focus Ireland has consistently argued that strong collaboration is key to tackling homelessness, and this approach should not only be at the heart of the new *Action Plan* but also inform its drafting. We particularly welcome the initiatives to include the voice of people experiencing homelessness, such as through the Focus Ireland Child Panels, and strongly recommend a continued interactive process of consultation during the drafting process itself, as well as in the implementation.

Policymakers now have access to unprecedented research and analysis of family homelessness in Ireland⁴, allowing the *Action Plan* to respond more effectively to the specific needs and experiences of different families who face homelessness. In particular the *Action Plan* needs to address the over representation of lone parents⁵, the particular problems faced by larger families, the different pathways into homelessness, and the impact of different housing allocation policies.

This submission draws on this knowledge and proposes a strategic approach built around six workstreams.⁶

Workstream 1: Prevention of Family Homelessness

Families that become homeless follow, broadly speaking, three pathways into homelessness⁷: from a stable home in the private rental sector; through new family formation or through a range of complex pathways (including DV and migration). Understanding these pathways has important implications for the *Action Plan*.

¹ For more detail see [“Towards a Family Homeless Strategy”](#) (2021)

² O’Sullivan, E., McGovern, A., and Allen, M. (2025) Focus on Homelessness: All Regions, Dublin, Focus Ireland

³ O’Sullivan, E., Curran, H., Byrne, E. and Allen, M. (2024) COVID-19 and trends in homelessness in Ireland. In Research Handbook on Homelessness (pp. 313-325). Edward Elgar Publishing.

⁴ In particular: Maphosa, P. (2025) Family Homelessness in Dublin: New Families 2024 and trends 2016-2024, DRHE and [Long, A.E., Sheridan, S., Gambi, L. and Hoey, D., 2019. Family homelessness in Dublin: Causes, Housing histories, and Finding a Home. Focus Ireland.](#)

⁵ More details of lone parents and homelessness can be found in the report from the INVOLVE Horizon project: Sheridan, S. (2025) Lone Parents and Homelessness in Ireland. Executive Summary at <https://bit.ly/LoneParentES>

⁶ For more detail on the framework see [“Towards a Family Homeless Strategy”](#) (2021)

⁷ For more discussion and of these pathways see [Long et al. \(2019\) p37](#). Five routes were identified: Stable Housing History; Precarious Housing History, Highly Unstable Housing, New Family Formation, Vulnerable Migrant Pathways.

Private Rental Sector Pathways

It is positive that *Delivering Homes, Building Communities 2025-2030 (DHBC)* recognises that presentations from the Private Rented Sector will be one of the priority areas in the upcoming Homeless Prevention Framework. Notices of Termination (NoTs) from the Private Rental Sector (PRS) continue to be the single largest driver of family homelessness in homeless presentation data with the recently published DRHE report on family homelessness⁸ confirming this analysis, finding that NoTs accounted for 40% of new family presentations in 2024 in Dublin. Additional security of tenure measures due to come into effect in March 2026 are welcome but leave households in pre-March 2026 PRS tenancies, and those with smaller landlords, at continued risk of no-fault eviction. Measures are still required to protect pre-2026 at-risk tenancies and prevent a continued flow into homelessness from this large group of renters.

- Relaunch an enhanced Tenant-in-Situ scheme to protect households not covered by the 2026 reforms

Since the discontinuation of the eviction moratorium, the Tenant in Situ (TiS) scheme has been a crucial tool in preventing families and individuals from becoming homeless, saving the Department significant costs in emergency accommodation (EA) as well as averting the human cost of homelessness.

Confused messaging about the TiS has resulted in it now being seen as unreliable, with limited, stop-start funding. Departmental guidelines emphasise when it should not be used rather than the strategic role it could play, and the characterisation of it as a ‘last resort’, makes little sense for a measure which involves the lengthy process of purchasing homes. In effect, the ‘safety-net’ put in place at the end of the no-fault eviction moratorium has been weakened, resulting in a decline in the number of households prevented from becoming homeless - 2,150 in the first three quarters of 2025, down from 2,991 for the same period in 2024^{9,10}.

The *Action Plan* should include a renewed commitment to an adequately funded TiS scheme with a clear, pro-active remit, as part of a range of measures for preventing homelessness for families facing no-fault evictions in tenancies started pre-2026 and of smaller landlords. Conditions which were introduced with no evidence and limit its effectiveness for vulnerable families, such as that tenancies should be in place for more than 2 years, should be removed.

- Ensure that the Housing Assistance Programme (HAP) reflects real rent levels, match legally permitted rent increases and end the need for ‘top-up’ payments

Focus Ireland welcomes the commitment in *DHBC* to carry out a review of the HAP Scheme, further to the commitment to this Review by the Minister for Housing in July 2025. The problems with the scheme are well documented¹¹, affording the Minister a clear pathway to

⁸ Maphosa, P. (2025) [Family Homelessness in Dublin: New Entries in 2024 and Trends Over Nine Years \(2016–2024\)](#). Dublin: Dublin Region Homeless Executive

⁹ Department of Housing, Local Government and Heritage (2025) Homeless Quarterly Progress Report 2025 Q3

¹⁰ Families and individuals often don't present to homeless services immediately after becoming homeless so the impact of funding and policy changes to TiS may not be fully evident in presentations to homeless services for months.

¹¹ [Focus Ireland \(2023\) Submission to the Review of the Private Rented Sector](#); Office of the Ombudsman (2025) [Ombudsman Investigation of the HAP Scheme - Summary: Findings and Recommendations \(2025\)](#)

improving the scheme in the short term, many of which are process changes that do not require any additional budgetary allocation.

HAP rent levels that reflect market realities are required both to make private rented tenancies more viable for vulnerable tenants *at risk* of homelessness, and to support families *to exit* homelessness. Notably, while exits from homelessness tended to be evenly divided between HAP and Social Housing, in 2025 social housing now accounting for 76% of exits¹². An increase in HAP rent levels is especially critical given incoming rent reforms; without an increase in rates, it is unlikely that lower-income families will be able to either remain in or access properties where rent is reset. For the PRS to play its essential role in preventing homelessness and providing an exit from it, HAP levels must reflect real rents and include a mechanism to increase in response to rent increases permitted under the 2026 legislation.

New Family Formation Pathways

The second largest group of families entering homelessness are young parents who are themselves leaving the family home, typically recorded as being homeless due to ‘relationship or family breakdown’. Little attention has been paid to the specific needs of this group, and they were excluded from the Youth Homeless Strategy. Some of the measures which could reduce homelessness in this group are discussed under Workstream 2 below.

Complex pathways

- Ensure the new Domestic Violence protocol clearly defines responsibilities and processes for consistent implementation across all local authorities (Stage 3 Prevention under the forthcoming Homeless Prevention Framework)

Fleeing domestic violence (DV) remains a frequently cited reasons for families presenting to homeless services and may well be under reported.¹³ Focus Ireland welcomes the commitment in *DHBC* to develop a new protocol with LAs, enabling victims of DV to transfer time previously spent on a social housing waiting list between LA areas, subject to eligibility requirements, however, further clarity is needed and the scope of the protocol needs to be wider, including the specific responsibilities of LAs.¹⁴ The *Action Plan* provides an important opportunity to develop this new Protocol as a homeless prevention measure, through a collaborative, multi-agency approach.

Workstream 2: Rapid Re-housing

While prevention services are more effective at Stage 1 or 2 of the Prevention Framework, Crisis-point (Stage 3) intervention remains vital. Engaging with families while they are in crisis (either due to a NoT or due to household relationships) can increase their chances of finding or retaining a secure home and avoiding having to enter EA.

For several years, the DRHE has reported impressive success with a range of ‘rapid rehousing measures’ which prevent homelessness. These include early access to Homeless HAP supports

¹² [DRHE Monthly Report on Homelessness in the Dublin Region - December 2025](#)

¹³ Maphosa, P. (2025) [Family Homelessness in Dublin: New Entries in 2024 and Trends Over Nine Years \(2016–2024\)](#). Dublin: Dublin Region Homeless Executive

¹⁴ Mayock, P. and Neary, F. (2021) [Domestic Violence and Family Homelessness](#). Dublin: Focus Ireland & The Housing Agency. This identified inconsistent LA responses and unclear agency roles as key barriers to safe and timely housing. The research recommended a review of existing guidance for housing authorities to strengthen and clarify their role in responding to the housing needs of victims of domestic violence.

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. This is a lost opportunity to learn from and scale up one of the few successes in homeless policy in recent years.

While interventions during this period of housing crisis can result in significant reduction in the number of families becoming homeless, their successes are poorly documented, and policies are often in conflict with each other. For instance, while it may be in the best interest of some families to remain in unsuitable housing while they seek secure housing, they are only provided with case management and other supports if they actually enter EA. Consideration should be given in the *Action Plan* to extending support measures such as mediation and case management to families that were deemed homeless but not residing in emergency accommodation.

Workstream 3: Reducing the harm done by homelessness

There is considerable evidence to show that a period in homeless EA can be damaging to the wellbeing of parents and children.¹⁵ This is further exacerbated where families spend longer periods trapped in homelessness.

- **Ensure that every child in homelessness has timely access to a Child Support Worker**

Focus Ireland has long advocated that every child in homelessness who needs one should have access to a Child Support Worker (CSW), to help to reduce the detrimental impacts of homelessness.¹⁶ The Office of the Ombudsman for Children has also recommended greater focus on practical supports such as CSWs¹⁷, which can reduce the pressure and stress on parents thus enabling them to engage much more fully both with supporting their children and on taking the necessary steps to find a new home.

Currently, there are insufficient CSWs for the children who require their supports, deepening the avoidable long-term harm of family homelessness. The *Action Plan* should include a cross-departmental commitment to providing funding for an adequate number of CSWs.

- **Incorporate the Best Interests of the Child into legislation**

Focus Ireland has long argued that adopting a 'Best Interest of the Child' approach that considers educational, medical and family supports would lead to better outcomes for children experiencing homelessness. The *Action Plan* presents an opportunity to commit to incorporating the best interests of the child into the forthcoming Housing Miscellaneous Bill 2025, ensuring that children's needs and access to safe family accommodation are central to housing decisions.

¹⁵ Lucey, H., (2025) [Faltering care: why mothers experiencing homelessness in Dublin, Ireland, miss their childcare visits](#). Anthropology & Medicine, pp.1-16.

¹⁶ Focus Ireland's [Insights into Family Homelessness](#) series found that families in EA often experience substandard living conditions, including overcrowding, a lack of privacy safety and, unsanitary conditions for children.

¹⁷ Ombudsman for Children's Office (2019) [No Place Like No Home: Children's Views and Experiences of Living in Family Hubs](#). Dublin: Ombudsman for Children's Office

- **Standards in Emergency Accommodation**

The need to rapidly increase the amount of EA for families as homelessness accelerated after Covid protections were removed resulted in a number of below standard facilities having to be used, including a deterioration of facilities for cooking and family meals¹⁸. The *Action Plan* should include a clear commitment to ensuring basic standards in all EA are met and an aspiration to provide own-door facilities where possible.

Workstream 4: Increase Housing Supply Available to Long-Term Homeless Families

Most families who are homeless do not have on-going support needs, so their solution to exiting homelessness will come through being able to improve their access to available housing. Under a housing strategy that genuinely prioritises homelessness, homeless households would access available social housing more quickly than other applicants. Recent research shows that this is not the case¹⁹. The authors argue that this, in part, reflects a mismatch between the size of homeless households on the social housing waiting list and the size of the units available for letting so delivering on DHBC's commitment to increase the number of larger family homes, in particular 4 and 5-bed homes, will need to be delivered in tandem with the *Action Plan*.

Focus Ireland strongly welcomes the commitment in DHBC to "Ensure that sufficient allocations of social housing are being made to reduce long-term family homelessness". Now, we must examine the most effective way to ensure that fully State-financed homes are being utilised to achieve this aim. While amendments to allocation schemes are one route, the *Action Plan* should examine how the Department of Housing can use financing to, in essence, 'pre-allocate' homes to homeless families and households and to ensure that the right sized homes are being built.

- **Use funding approval processes to ring-fence a proportion of social homes for long-term homeless families**

This proposal does not require additional Exchequer spending on new social homes, but a process change that would ensure that every new scheme over a certain size would require a minimum percentage (10-20%) to be allocated to homeless households. Suggestions that this would disincentive build projects would only be borne out if there was a significant administrative burden. As social homes are already built by AHBs and LAs, and are fully financed by the State, all of whom want to see the number of people in homelessness fall, it is unlikely that there would be any objection at a funding stage that the homes once built would eventually be tenanted by formerly homeless households.

¹⁸ [Share, M. and Hennessy, M. \(2017\) Food access and nutritional health among families in emergency homeless accommodation. Focus Ireland \(funded by the Department of Children\) for details of challenges, many of which persist or have re-occurred, as well as an indication of appropriate standards.](#)

¹⁹ [Bairéad, C. and Norris, M \(2025\) Demographic and Socio-Economic Profile of Applicants for Social Housing and Recipients of Housing Assistance Payment. Dublin: Housing Agency](#)

- Launch 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.

There is a significant group of homeless families for whom a social housing allocation will not be a realistic option for several years and, while the private rental sector is their only route of homelessness, they face considerable difficulties in accessing a private rental tenancy. Solutions for this group of families require the creation of a cohort of supportive landlords willing to create stable long-term tenancies. The Rental Assistance Scheme (RAS) provides a stronger basis for creating such a housing option than HAP, as it involves a partnership between Local Authorities, landlords, NGOs and the tenant. Such an enhanced RAS scheme should not be introduced as a scatter-gun additional option but as a specific programme targeted at families who face particular challenges in exiting homelessness. The higher levels of rent subsidy which would be needed to attract landlords to this programme would be protected, and value for money assured, by clear targeting of eligible families.

Workstream 5: Ensure additional supports are available to families who need them to rapidly exit homelessness to secure housing

- Develop a shared framework for assessing support need

While there is a broad recognition that some homeless households have greater support needs than others, there is no agreed framework across the LAs for assessing the level of need, and the consequent resource requirements. There is little consistency across LAs in application of the different categories of need, and while a mechanism for operationalising a shared framework exists on PASS, 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 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.

- Pilot a multi-disciplinary team for families with complex support needs

A relatively small but significant number of families experiencing homelessness require additional supports to exit from homelessness and to sustain a tenancy. In some cases, the support needs include therapeutic and psychological supports. 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 EA. A feasibility study, commissioned by Focus Ireland, examined the potential, and challenges, of establishing 'multi-disciplinary teams'²⁰ (MDTs) to support this group of vulnerable families not only to exit homelessness but to sustain long-term housing stability. *DHBC* reinforces the need to support

²⁰ Focus Ireland (2023) [Multidisciplinary Team for Homeless Families Feasibility Study](#). Dublin: Focus Ireland

these families with a commitment to 'increase the supports provided to households in EA, in particular to children and households with complex support needs'.

The *Action Plan* is a key opportunity to commit to a fully funded two-year pilot MDT for families, followed by a full evaluation with a view to future expansion. A partnership model between the DRHE, HSE Social Inclusion, Tusla and service providers will be required to identify complex support needs inhibiting families from sustainable exits from homelessness. The proposed model would deliver integrated supports ensuring timely access to therapeutic, medical, educational, and social care interventions. This approach will reduce crisis escalation and deliver measurable savings to the health, housing, and social care services, and support families with the most complex support needs to exit homelessness.

- Prioritise the prevention of repeat homelessness by introducing a new tenancy sustainment programme for families with complex support needs (to align with Stage 5 of the forthcoming Homeless Prevention Framework)

Alongside the MDT pilot to support families while in EA, a small number of families exiting homelessness require additional, long-term support to their sustain tenancies and to prevent repeat homelessness. The lack of these supports reduces the chances of these families making a sustained exit from homelessness and exacerbates their existing needs. Building on the successes of Housing First in Ireland over the last decade, *DHBC* commits to increasing the number of Housing First tenancies to 2,000. This commitment provides an opportunity to broaden the household type that is eligible for Housing First supports. In particular, providing a Housing First strand for the relatively small number of families that have a similar level of support needs the current adult-only in-take would contribute to commitments and the outstanding Housing for All commitments to provide enhanced tenancy sustainment supports to help this small cohort of families to exit homelessness and maintain their homes.

Workstream 6: Targets and Governance

It is essential that the *Action Plan* identifies a number of meaningful measures through which it can demonstrate progress. There is no escaping the reality that the total number of homeless families as reported each month will remain the most public indicator of success or failure, but it is essential to establish more nuanced measures which indicate the impact of new measures and build morale across the organisations involved in tackling the problem.

Focus Ireland strongly discourages targets based entirely on process indicators (completion of a review, publication of a report etc.) and recommends achievable indicators based on an understanding of the dynamics of homelessness- average duration of homelessness for families; number of families who are homeless for over 1/2/3 years; close attention to not only the number but also the nature of presentations and exits. We also recommend development of indicators in relation to families who are in crisis risk of homelessness and the effectiveness of prevention measures in averting them becoming homeless. Focus Ireland further recommends that the establishment of such indicators should be delegated to a 'Data, Research and Monitoring' Sub-Group of NHAC.

In terms of governance and oversight of the Strategy, we welcome the structure in which NHAC reports to a Cabinet Sub-Committee in relation to the broad range of homelessness measures. In relation to the *Action Plan*, we recommend the establishment of an on-going

NHAC sub-group to oversee the implementation of the Plan in a collaborative way. This sub-group should include representatives from relevant Government departments and agencies along with relevant NGOs. Continuing on one of the successful aspects of the Youth Homeless Strategy, the NHAC Sub-Group should have an independent Chair. The sub-group should report every 6 months to NHAC, indicating progress but also escalating barriers or blockages which have emerged.

Conclusion

The Child and Family Homelessness Action Plan presents a unique opportunity to put in place an evidence-based, cross Departmental approach to a problem which is at risk of being seen as unsolvable. Drawing from our services expertise, and from our own and international research, Focus Ireland has proposed a framework which reflects the understood pathways into and out of homelessness, and the different experiences and needs of families who experience crisis and homelessness.

The Department has requested submissions which are as brief as possible, so it has not been possible to detail the evidence for each of the proposals made here or fully explain the proposed impact. While we have indicated the source of these proposals, we are also available to explain or expand any proposal, as part of an on-going consultation, where that would be helpful.

It is not possible from available data to estimate the number of children who have been through the traumatic experience of homelessness in the last decade, but analysis of adult homelessness shows that over 60,000 adults have been through the homeless system over the last decade, suggesting that the number of children would amount to tens of thousands. With the right policies, adequate commitment of resources and a collaborative approach across Government and beyond, the Child and Family Homelessness Action Plan could represent a turning point in which the next decade sees family homelessness falling and far fewer children experiencing the trauma and harm that it involves.