



Focus Ireland submission to inform the
development of the National Homelessness
Prevention Framework

April 2026

Introduction

Focus Ireland welcomes the decision to develop a Homeless Prevention Framework based on the five-stage typology proposed by [Fitzpatrick, Mackie and Wood](#).

From our perspective, what makes this piece of work different to other Strategies or Action Plans developed by the Department in recent years is that it has the potential to change how we view homelessness and its causes, as well as integrating other arms and agencies of the State into homeless prevention. While homelessness is always a housing issue, it is rarely *exclusively* a housing issue: the actions and decisions taken by other State agencies and Departments can be hugely influential on whether someone becomes homeless. The development of the Homeless Prevention Framework provides a unique opportunity to engage all parts of the State which may inadvertently contribute to a pathway into homelessness and to delineate their responsibility on a framework which is housing-led – and Housing Department led.

Homelessness for individuals or families can rarely be explained by a single event or cause, it more usually involves a series of events, leading to a final trigger into homeless services. As a result, it is often misleading to attribute one ‘cause’ of homelessness, and consequently it is problematic to identify which single action would have prevented it. Equally, where a household does not enter homelessness after a particular intervention, it is impossible to be certain that the household might have avoided homelessness even without that intervention – making it difficult to distinguish between effective and unnecessary expenditure.

For this reason, a Framework on preventing homelessness must be approached from a systematic standpoint, rather than on the basis of individual cases and periodic crises. The Framework is also an opportunity to reframe how progress is achieved and recorded. 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 pathways into and dynamics of homelessness; close attention to not only the number but also the nature of prevention, presentations and exits. As part of the Framework development, we recommend the design of indicators in relation to families and individuals who are at risk of homelessness and the effectiveness of prevention measures in averting them becoming homeless. To facilitate this, and to strengthen the collaboration, which is essential to this project, Focus Ireland again recommends that the establishment of such indicators should be delegated to a ‘Data, Research and Monitoring’ Sub-Group of the National Homeless Action Committee (NHAC).

Universal Prevention

Universal Prevention is in many ways the most important element of effective homeless prevention but the most difficult to identify. The actions and decisions taken by many agencies of the State around social welfare, migration, education disability etc. all have the potential to be universal, or non-universal, homeless prevention depending on the decisions made and policies implemented.

Many of the proposals that Focus Ireland has made in recent years around the size and location of new social homes; wider issues with the PRS and HAP scheme; the need for an independent and transparent appeals system; the restrictions placed on and the opportunity presented by, second-hand acquisitions and the unique challenges of AHBs could all be classified as Universal Homeless Prevention.

We recognise that it would be impractical to apply a homeless prevention-lens to every State policy before the Framework is published, however unless a clear timescale is set for looking at the Universal level of prevention it will simply not happen.

The published National Homeless Prevention Framework should set out a clear timeframe and process for exploring the cross-Government issues that arise under universal prevention.

Upstream prevention

Upstream prevention is usually focused on identifying ‘at-risk’ groups that face more difficulties accessing housing and are at a higher risk of homelessness than others. We know that lone-parents, migrants, young people leaving residential State care, Travellers and Roma people, disabled people all face a much higher risk of homelessness than others because of lower incomes, exclusion from employment and discrimination.

While there is value in recognising and putting in place specific supports for these groups, this approach can result in an extensive list of ‘vulnerable groups’ and little effective action. We believe that a more effective policy approach is to track *the pathways* into homelessness and identify the points at which interventions can be made that divert from a pathway into homelessness. The work of Prof Paula Mayock on youth homelessness and Dr Sarah Sheridan on Family homelessness, for instance, provide practical examples of this approach in the Irish context.

For instance. families and individuals that enter homelessness follow, broadly speaking, several distinct pathways into homelessness:

- 1) From a stable home in the private rental sector
- 2) From a succession of less stable homes in the private sector
- 3) Through new family formation and overcrowding in the family home
- 4) Through a range of complex pathways, including Domestic Violence
- 5) From other State institutions
- 6) From pathways specific to certain migrant households (N.B. many households of migrant origin enter homelessness through the other pathways)
- 7) Youth-specific pathways

Broadly speaking these pathways can be used to frame practical discussion of pathways into homelessness for a broader range of households and people, with the addition of a ‘institutions’ pathway (involving hospitals, addiction treatment facilities, prisons and state care) for young adults and adult-only households.

Detailed understanding of these pathways has important implications for the Upstream section of the Framework. For instance, the work of Mayock and O’Sullivan in tracking the pathways of young care leavers, identified the potential crucial role of wider family in preventing homelessness for certain groups, resulting in new practices in aftercare services.

1) Pathways from secure private rental tenancies.

Households entering homelessness through this pathway are well settled in private rented accommodation, often with one long successful tenancy. The head of household is frequently in employment. In a private rental sector that was functioned effectively for renters, these households would be at very low risk of homelessness – if they were unlucky enough to lose their home because their landlord was selling up, they would find alternative accommodation easily. For several years, such households are at significant risk of homelessness in Ireland due to the shortage of alternative rented accommodation at an affordable price. At the time of entering homeless services, these households have few support needs but experience indicates that overtime the impact of homelessness can lead to a range of issues. This group comprise the largest group of family households becoming homeless and, while data is less reliable, they are likely to be a significant group among adult-only households. This group includes a significant number of families where the parents are not born in Ireland but have been settled for several years. This group are the primary target of a number of exiting prevention measures: the ‘rapid rehousing’ preventative measures run by DRHE and other local authorities and the Tenant in Situ (TiS) initiative.

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 report¹ on family homelessness confirming this analysis, finding that NoTs accounted for 40% of new family presentations in 2024 in Dublin.

While we broadly welcome the additional security of tenure measures that came into effect on 1st of March 2026, households in pre-March 2026 PRS tenancies, and those with smaller landlords, will continue to be at risk of no-fault eviction for as long as those tenancies remain within the system. The recent NoT data from the RTB shows that nearly 12,000 households were at risk of eviction last year because landlords wanted to sell the property². With one third of tenants renting with some kind of State support³, and no breakdown of NoT data on whether a tenant is supported by the HAP scheme, this could mean that nearly 4,000 households receiving HAP, RAS or Rent Supplement were at risk of eviction, and potentially homelessness, last year.

Measures are still required to protect pre-2026 at-risk tenancies and prevent a continued flow into homelessness from this large group of renters.

- i) [Relaunch enhanced Tenant-in-Situ supports to protect households not covered by the 2026 reforms](#)

Tenant in Situ (TiS) purchases have been a crucial tool in preventing families and individuals from becoming homeless since the discontinuation of the eviction moratorium in 2023, saving the Department of Housing significant costs in emergency accommodation (EA) as well as averting the human cost of homelessness. Confused messaging about TiS purchases has resulted in it now being seen as unreliable, with limited, stop-start funding.

Departmental guidelines in Circular: Housing 07/2026 stress that tenant-in-situ purchases should be a ‘last resort policy option’ and that any LAs that are seen to be operating any kind of ‘application processes’ are at risk of having their funding stopped. The message and process laid out to LAs is now so complex and does not recognise the strategic role that TiS purchases could play, as well as ignoring the lengthy process LAs have to follow when purchasing homes.

¹ DRHE (2025) [Patterns of Emergency Accommodation Usage in the Dublin Region by Single Adults and Families, 2017-2024](#)

² RTB (2026) [RTB data hub- Notices of Termination Q2 2023-Q4 2025](#)

³ [LOW INCOME RENTERS AND HOUSING SUPPORTS \(esri.ie\)](#)

The insistence that TiS is not a scheme but needs to be decided by Local Authorities as part of their wider second-hand acquisition budgets puts this key homeless prevention measure in competition with households trying to exit homelessness, care-leavers, older people etc. This is borne out in the decrease in homeless prevention last year via TiS purchases which fell significantly from 1,034 in 2024 to 301 in 2025.⁴ This resulted in a decline in the number of households prevented from becoming homeless - 2,910 in 2025, down from 4,176 in 2024⁵.

The new Framework should include a renewed commitment to adequately funded TiS purchases with a clear, pro-active remit, as part of a range of measures for preventing homelessness for families and individuals facing no-fault evictions in tenancies started pre-2026 and of smaller landlords.

ii) [Access to Homeless HAP nationally in advance of NoT date](#)

One of the key responses of successive Governments to the crisis in the private rental sector has been to give tenants longer notice periods where the landlord has a legal right to evict. This approach gives the tenant a longer period to find alternative accommodation. In a more normal rental market this would have had greater positive impact, but due to the severe shortage of affordable alternative rentals, this has been less effective than might have been hoped.

At present Dublin local authorities operate informal systems in which they allow households with a valid NoT to access Homeless HAP, while non-Dublin authorities allow access to enhanced HAP levels. Some local authorities allow this enhanced payment 8 weeks prior to the date of the NoT while others wait until 4 weeks. Particularly where the time allowed is only 4 weeks, or where the household faces particular challenges (e.g., larger families, family member with a disability, members of the ethnic minorities, young adults) many households are unable to find alternative accommodation in time and become homeless.

Given the severe shortage of affordable rental housing, there should be a much more proactive and flexible approach to providing Homeless HAP payments. Right now, a tenant facing an eviction could identify a suitable property to avoid homeless 12 weeks before their eviction date but not be able to access Homeless HAP for many weeks and the property will likely be rented by the time they can access the uplift.

⁴Department of Housing (2026) Homeless Quarterly Progress Reports 2024-2025

⁵ Department of Housing (2026) Homeless Quarterly Progress Reports 2024-2025

- iii) Evaluation of the ‘rapid re-housing’ prevention programmes operated by DRHE and other local authorities.

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 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.

2) Pathways from insecure private rental tenancies.

Households entering homelessness through this pathway would typically have a number of shorter tenancies in the private rental sector, potentially difficult relationships with landlords for a variety of reasons. The proximate event leading to homelessness may involve a no-fault eviction or an eviction arising from failure to comply with tenancy rules. Most households in this category will have been reliant on HAP prior to homelessness. The main measure currently in place to support the families relate to the level of HAP payment and any interventions in at risk HAP tenancies by the HAP shared services unit in Limerick.

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

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 and individuals to exit homelessness. Notably, while exits from homelessness in previous years tended to be evenly divided between HAP and Social Housing, in 2025 social housing accounted for 76% of adult exits.⁶

The ongoing review of the HAP rent levels is welcome and long overdue. The problems with the scheme are well documented, affording the Minister a clear pathway to improving the scheme in the short term, many of which are process changes that do not require any additional budgetary allocation, however, the decision for the current review to only review rent levels is disappointing. The Framework should commit to examine wider issues with the HAP scheme under the lens of prevention as highlighted by the Office of the Ombudsman in 2025⁷.

⁶ Department of Housing (2026) [Homeless Quarterly Progress Report Quarter 4 2025](#)

⁷ Office of the Ombudsman (2025) [Investigation of the HAP scheme](#)

On the issue of rent levels, an increase in HAP rent levels is especially critical now given the new rent reforms that came into law on the 1st of March 2026. Without an increase in HAP rates, it is unlikely that lower-income families will be able to either remain in or access properties where rent is reset. For the Private Rented Sector to play its essential role in preventing homelessness, and providing an exit from EA, HAP levels must reflect real rents and include a mechanism to increase in response to rent increases permitted under the 2026 legislation.

Focus Ireland will present its recommendations to amending the HAP Scheme in the separate consultation on this topic; however, we strongly urge that any changes to the scheme are considered as a key homeless prevention tool under the new Framework.

- v) [Review of the policies and practices of the HAP shared services centre to place tenancy sustainment/homelessness prevention as one of the key objectives.](#)

As part of an initiative of the National Homeless Action Committee, Focus Ireland participated in two pilot initiatives looking at potential interventions in Homeless HAP tenancies which were at risk of breaking down due to rent arrears. The pilot programmes identified a significant number of HHAP tenancies that were terminated on the basis of very small levels of rent arrears or delays in welfare payments. The reports indicated that a significant number of HAP tenancies are terminated due to issues which would appear to be completely resolvable. Focus Ireland submitted detailed reports on these pilots to the NHAC, and a number of changes in process were implemented on the foot of them, as were a range of measures to reduce the losses of landlords when HAP tenancies ended. However, the pilot service was discontinued⁸ and no information has been published about the impact of the changes.

One factor which emerged from the project was that the HAP Shared Service unit has a primary goal of preventing the accumulated rent arrears but has no focus or performance metric in relation to tenancy sustainment. The HAP shared services unit does not appear to share data with the RTB, does not publish accessible reports and does not appear to collect data in a way which makes its potential role in tenancy sustainment visible.

The HAP Shared Service unit is a prime example of a public body which does its given task efficiently and well, but the given task does not place tenancy sustainment, or prevention of homelessness, as a central concern. The problem lies with the mandate not with the service or its staff. As such, the unit represents an example of a relatively easy win for the

⁸ Focus Ireland has not published these reports as they were commissioned by the NHAC, but they are available on request.

new prevention framework approach, but equally a test case of how seriously the approach is taken.

3) New family formation pathways into homelessness

vi) Provide homeless supports without requiring the need to enter EA

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’ or ‘overcrowding’⁹. Little attention has been paid to the specific needs of this group, and they were excluded from the Youth Homeless Strategy. Consideration should be given in the Framework to extending support measures such as mediation and case management to these families who are at very high risk of entering EA but are not residing in emergency accommodation

While interventions during a 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.

4) Complex pathways into homelessness

The ‘complex pathways’ into homelessness covers a range of different routes which can be usefully if broadly sub-divided. Households entering homelessness from this pathway are characterised more by the challenges they face than by their prior tenancy. For instance, a family entering homelessness arising from Domestic Violence may previously have lived in social housing, private rental accommodation or an owner-occupied dwelling. Equally, a single person entering homelessness due to mental health issues or addiction may have previously been part of an owner-occupier family or a single person in the private rental sector. For this reason, there is some overlap between this pathway and the ‘unstable private rental’ pathway. This pathway constitutes the more stereotypical pathway into homelessness, and consequently a large number of interventions exist, at least in theory, to prevent homelessness. However, many of these are under resourced, operate in isolation or have other purposes which are dominant in practice.

⁹ [Maphosa, P. \(2025\) Family Homelessness in Dublin: New Entries in 2024 and Trends Over Nine Years \(2016–2024\). Dublin: Dublin Region Homeless Executive.](#)

For practical purposes, it is useful to draw out particular examples of complex pathways rather than treat them as one group. For the purposes of this submission, we have concentrated on Domestic Violence as an example

- vii) Ensure the new Domestic Violence protocol clearly defines responsibilities and processes for consistent implementation across all local authorities

Fleeing domestic violence (DV) remains a frequently cited reasons for families presenting to homeless services and may well be under reported¹⁰. 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.¹¹

The Framework provides an important opportunity to develop this new Protocol as a homeless prevention measure, through a collaborative, multi-agency approach.

5) Institutional pathways into homelessness

Households that enter homelessness through this pathway have typically been previously resident in a state service, such as a psychiatric hospital, prison or in special care as a minor. While each of the state institutions is very different they all provide residential accommodation, so that when the appropriate period for occupying that accommodation is ended, a person with nowhere else to go is at high risk of homelessness. In some case, the period of residence in the state institution can contribute to the absence of a place to live on leaving – for instance loss of rental accommodation or, over longer periods, social housing, during a hospital stay or prison sentence. It is worth noting that the Government Homeless Prevention Strategy of a quarter of a century ago (2002) concentrated almost entirely on this pathway into homelessness. In general, it adopted an approach of making state institutions responsible for providing ‘step down’ housing, and approach which, despite some early successes, failed as the challenges faced by non-housing institutions in providing housing became apparent¹².

¹⁰ [Maphosa, P. \(2025\) Family Homelessness in Dublin: New Entries in 2024 and Trends Over Nine Years \(2016–2024\). Dublin: Dublin Region Homeless Executive.](#)

¹¹ [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.

¹² See What is preventing prevention? (2014) <https://bit.ly/homelessprev>

viii) Leaving State Care: Embed a guaranteed aftercare supports and coordinated housing planning within the Prevention Framework

Focus Ireland’s youth services and research consistently highlight the persistent link between experiences of state care and subsequent homelessness¹³. This is also evident in research by the DRHE, which found that in 2023, among 18–24-year-olds in Dublin, leaving State care was the fifth most frequently cited reason for entering emergency accommodation. A major missed prevention point occurs at age 18, when many young people face a sudden drop in support and, in some cases, no guaranteed accommodation due to non-universal aftercare eligibility. This affects young people in long-term care as well as unaccompanied minors who may not qualify for aftercare because of limited time in care or unresolved immigration status.

Although mechanisms such as proposed HAP reforms and the Tusla CAS scheme offer potential routes into secure housing, delivery of Tusla CAS homes remain low and the scheme is poorly understood within Local Authorities. [A Department of Children evaluation](#) has identified several barriers contributing to this low delivery, including restrictive acquisition rules, low prioritisation relative to other housing programmes, and limited awareness of the scheme at local level. Focus Ireland believes the CAS process should therefore be restructured into a dedicated Homes for Care Leavers programme, with clear delivery targets agreed jointly by Tusla, Local Authorities and the Department of Housing.

Embedding guaranteed aftercare supports and coordinated housing planning within the Prevention Framework would provide meaningful early intervention for young people transitioning out of care and significantly reduce their risk of homelessness

ix) Mainstream intensive tenancy support services for discharge from psychiatric institutions

In 2025, “leaving hospital” appeared 71 times as a presenting reason for entering emergency accommodation in the [DRHE’s monthly](#) homeless reports. As this information is self-reported, it should be understood as an indication of hospital-related presentations rather than a precise measure of how many people became homeless following discharge.

For a number of years, Focus Ireland operated, in collaboration with the HSE Mid-West Mental Health Services (CHO3) and Tipperary County Council, an intensive tenancy support

¹³ See publications such as Dixon, J., Ward, J., Reeve, K., & Byrne, T. (2019). [Brighter Futures for Care Leavers: A qualitative study of outcomes, practices and support. Focus Ireland.](#)

service for people who are at risk of homelessness at the time of discharge from psychiatric institutions. An evaluation of this service was published¹⁴ and the collaboration won an HSE innovation award. This service has recently been extended to two further counties, again in collaboration with the HSE and the relevant local authorities.

The potential savings to the HSE and to homeless services are very considerable, however, due to the structure of budgets it has proven very slow to extend this approach beyond pilot areas. Similar services in all local authority/HSE areas would play an important role in reducing number of people with severe mental health issues entering homelessness.

- x) [Discharge from prison: tenancy protection, sentencing policy and a dedicated Housing First strand live.](#)

The complex relationship between homelessness and the criminal justice system is well documented. As with measuring discharges from hospital, the available data on exits from prison is limited and therefore not an accurate representation of the scale of need. Across the DRHE's monthly reports for 2025, "leaving prison" was recorded as a reason for presentation to homeless services on 47 occasions.¹⁵

A strategy to prevent homelessness arising from incarceration would start with Universal and Upstream initiatives to reduce offending, but more proximate issues such as the prevalence of short sentences (which often result in the loss of tenancies) and the weakness of policies in relation to Rent Supplement and HAP to sustain tenancies during short sentences would also reward attention.

Focus Ireland has been active in the area of incarceration, recidivism and homelessness prevention for many years. This happens directly through the delivery of specialist programmes such as the former Prison In-Reach services operating in Dublin and Limerick and the current Women's Outlook Programme¹⁶ which seeks to support women serve the remainder of their sentence in less restricted living environment and reduce the risk of a return or entry into homelessness.

¹⁴ [An Evaluation of the North Tipperary Intensive Tenancy Sustainment Service](#)

¹⁵ DRHE (2025) DRHE Monthly Reports Jan-Dec.

¹⁶ Focus Ireland (2024) [An Evaluation of the Focus Ireland Women's Outlook Programme](#)

The Framework should seek to develop an early warning system and early intervention protocol between the Department of Justice, the Irish Prison and Probation Services and LAs to identify people who are at risk of homelessness upon leaving prison.

As part of this new Framework, the Department should also explore building on the success of the Housing First programme (which currently only supports people with complex support needs and a long experience of homelessness to exit homelessness) and identify opportunities to utilize Housing First as a Homeless Prevention tool. Focus Ireland welcomes the *DHBC*'s commitment to increase the number of Housing First tenancies to 2,000 by the end of the Strategy and believes that this gives up as opportunity to broaden the household type and use of Housing First in Ireland.

Introducing a HF strand for individuals at very high risk of homelessness after leaving the Prison system and other institutional pathways like State care or psychiatric institutions would provide a route into housing and stability for vulnerable people with complex support needs who are often discharged straight into homelessness by a State agency.

- xi) [Develop a joint protocol to stop the eviction people 'with status' in International Protection Accommodation into homeless services](#)

While this specific institutional pathway applies only to refugees, it is included as an institutional issue as it more closely reflects the problems experienced by residents in other institutions than the more complex issues dealt with under 'Complex Migrant pathways' below.

In February 2026, it was reported that the International Protection Accommodation Service (IPAS) was accommodating nearly 33,000 people, with around 5,000 people having been granted refugee status or permission to remain in Ireland¹⁷. Despite their legal status, these 5,000 individuals have no alternative but to remain in IPAS 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 Framework must recognise these individuals and families as part of the housing and homelessness challenge that we face but the Department of Justice must immediately discontinue its policy of terminating accommodation in IPAS centres leaving people with no other choice but to present to homeless services. A joined-up protocol must be agreed

¹⁷ [Dáil Éireann Debates, Written Answers, Question No. 945 \(17 February 2026\)](#)

between the two parts of the state for a transfer to the homeless system with minimum disruption and trauma.

Furthermore, Local Authority Housing Delivery Action Plans and 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 prevent all forms of homelessness.

6) Complex Migrant Specific Pathways

Households who enter homelessness through this pathway are diverse and the range of challenges they face are complex and interacting. In some cases, individuals face similar problems to people in other pathways (poverty, mental health issues, DV, etc) and the situation of many migrants need to be understood in these pathways, but in cases which are best understood in this pathway the challenges interact with legal or regulatory challenges specific to their status. Prejudice and racism can also play a role in this pathway, though it is not absent in other pathways too.

xii) Family re-unification for people with refugee status

Government policy allows a person who has international protection (refugee status or subsidiary protection) to apply to the Minister for Justice and Equality for permission to have a member of their family enter and live in the State. If approved they will be entitled to upon arrival, to social protection supports and housing rights. However, administrative processes do not allow the person to make arrangements (e.g., applying for a PPS number, completing a social housing needs assessment, looking for a home to rent with HAP) to provide housing for their family until they arrive, nor are they eligible for Homeless HAP. As a result, re-uniting families arrive in Ireland into an immediate crisis, frequently seeking access to emergency homeless accommodation or experiencing severe overcrowding in small apartments, which in turn leads to eviction and homelessness. Aside from the inhumanity of this, it places avoidable pressure on local authorities and homeless services and results in families unnecessarily entering homelessness.

Persons who have received international protection and who have been given Ministerial permission to bring over family members for Family Re-Unification should be able to apply for a PPS number prior to the arrival of the family and be eligible to be assessed for the housing needs of their full re-unified family in advance of the family arriving in Ireland. Such households should be eligible for Homeless HAP (or discretionary uplifts of HAP outside of Dublin). The protocols and sequencing of administrative processes should be updated where relevant to reflect this proposal to ensure that it works in practice

7) Youth-specific pathways into homelessness

Focus Ireland welcomes the commitment in *DHBC* to include a dedicated youth strand within the Homelessness Prevention Framework to build on the achievements of the Youth Homelessness Strategy and to integrate outstanding actions from the YHS. We encourage the Department to consult with the Irish Coalition to End Youth Homelessness in developing the Strand, as the Coalition brings broad expertise on youth homelessness and youth-specific needs.

The Youth Strand must recognise that young people experiencing homelessness are a diverse group with varied risks and pathways into homelessness that can be identified early in a young- person's life to prevent homelessness. Addressing this diversity requires coordinated action across Government to ensure the Prevention Framework reflects the full range of risks young people face and delivers targeted early interventions to reduce and ultimately end youth homelessness.

xiii) *Expand Youth Family Mediation Services and pilot the Upstream Model in Irish Schools*

Family breakdown is one of the leading drivers of youth homelessness. The [DRHE's analysis](#) of 2023 youth homelessness in Dublin found that relationship breakdown with a parent accounted for 27.8% of cases, rising to 36.5% when wider family conflict was included. Early intervention is therefore essential to prevent conflict from escalating into homelessness or, as mentioned above, into entry to the State care system.

Focus Ireland's Youth Family Mediation Service provides this early intervention by helping young people and their families resolve conflict, rebuild communication and stabilise home life. An evaluation¹⁸ of the service emphasised its impact, showing that mediation prevented youth homelessness and care entry, stabilised placements, improved family functioning and supported young people to remain engaged in education. The evaluation also recommends that, if the service is scaled nationally, an Irish version of Upstream should be developed. Upstream is a school-based early intervention model that uses a wellbeing survey to identify young people at risk of homelessness due to factors such as family breakdown, school disengagement or mental health challenges. Those identified receive early, tailored support through education, family and community services, preventing issues from escalating into crisis.

The Early Intervention and Prevention Subgroup of the National Youth Homelessness Strategy has also recommended expanding Youth Family Mediation and piloting Upstream

¹⁸ Focus Ireland (2025) [Evaluation of Focus Ireland Youth Family Mediation Service](#)

in Ireland. Embedding both Youth Family Mediation and Upstream within the Prevention Framework would significantly strengthen Ireland’s capacity to identify risk early, support families sooner and reduce youth homelessness

Crisis Prevention

While prevention services are more effective at Stage 1 or 2 of the Prevention Framework, Crisis-point intervention remains vital. Engaging with families and individuals 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 in the first place.

As part of the Framework development, the timeframe in which crisis supports are introduced should be revised and should begin to support families and individuals as soon as a high risk of homelessness is identified rather than reserve supports until a few weeks before homelessness is imminent.

- xiv) Provide funding for specialist homeless prevention Advice and Information Services.*

Focus Ireland operates a nationwide Advice and Information (A&I) service, largely funded by donations, which provided support to just under 10,000 households in 2025., supporting people at risk of homelessness through case management, legal advice and advocacy where required. Many of the people we work with require ongoing support to help stabilise their housing situation or prevent a crisis from escalating into homelessness¹⁹.

Access to the right supports through A&I is a vital part of preventing homelessness. While many Local Authorities undertake important prevention work at regional level, there remains significant variation in how each Local Authority approaches early intervention and the provision of advice and information. This inconsistency can make it harder for people to get the help they need quickly and can place additional pressure on our frontline staff. It is therefore vital that the Prevention Framework includes the streamlining of approaches to homelessness prevention among Local Authorities to ensure greater consistency in Advice and Information supports nationwide.

¹⁹ See ‘Are you Still Ok?’ a follow up report on customers supported by this and related services.

The Prevention Framework must recognise A&I as a key service in preventing homelessness. Moving toward a more coordinated national approach would ensure that people can receive timely, reliable and practical guidance wherever they live.

- xv) *A pilot programme to look at the impact of a case management approach with landlords who have issued an NoT, to provide information and address minor issues that could save tenancies*

In the run up to the new rental regulations coming into place on the 1st of March 2026, there was significant discourse from landlords that, due to personal circumstances, they felt they would have to evict tenants because of the new rules even where they had sitting tenants who did not fall under the new scheme and whose rights and obligations were the same before and after the 1st of March. It is unclear why these landlords believed that they needed to evict existing tenants, however the 41% increase in NoTs in 2025 compared to 2024, would suggest that there is a significant proportion of landlords who have decided that they would rather sell a property than continue to rent it out with an existing tenant in place. As noted above, such evictions will continue to be part of the housing situation until all remaining pre-2026 tenancies are completed.

Other than a standard letter from the RTB in advance of the new regulations, we are not aware of any process to actively engage with landlords who have issued an NoT to sell which would help identify the reasons for the decision and perhaps alter or delay the decision by providing information or access to other existing supports. This engagement could be modelled on the case management approach in relation to people experiencing homelessness, in which the case manager assists in problem solving and linking the client with other services which can assist them but which they may not be aware of. While not every NoT will result in an eviction, and not every eviction will lead to homelessness, this is a lost opportunity to sustain tenancies and, at the very least, gain greater understanding of the decision driving landlord decisions.

The organisation best placed to carry out this engagement would be the RTB as they must be notified of an NoT at the same time as the tenant. A pilot programme that resources the RTB to engage with landlords when they issue an NoT where the household is receiving State support to see if anything could be identified to keep the tenancy in place should be considered as part of the Framework.

Repeat Homelessness Prevention

- xvi) *Integrate Departmental approval for social housing construction with departmental/local authority approval for provision of required Section 10-funded support workers.*

At present the lack of integration between the funding approval to construct homes for people with complex needs moving out of homelessness with the funding approval to provide them with the tenancy sustainment supports they will need represents a significant barrier to the provision of special needs housing.

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 be able to sustain a tenancy with other landlords. Focus Ireland provides the tenancy support using a case management approach.

This Focus Ireland/Focus Housing model of housing and support has a very high success rate (well over 90% tenancy sustainment for people with complex support needs), and involves a team comprising housing management staff, tenancy sustainment staff, and community development staff. Although it is widely recognised that this 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.

Funding for tenancy sustainment support can be provided under Section 10 through negotiation with individual local authorities after the completion of the housing at the time of allocation. Where local authorities decline or are unable to secure Section 10 funding, 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.

Delivering Homes, Building Communities 2025-2030 contains a commitment to look at funding of support for people who are homeless, but this appears to primarily consider HSE funding for support workers for people who are currently homeless, rather than the issue of tenancy sustainment.

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 as explained below.

xvii) Establish a shared framework across all stakeholders for assessing the level of support need required by households leaving homelessness

As Focus Ireland has previously highlighted, while there is generally agreement that some households have higher support needs than others, there is no shared framework for local authorities and homeless organisations to ascertain the level of tenancy support that an individual/household will need to sustain their tenancy.

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) and the agencies it funds as an assessment framework that analyses needs and services at different levels.

We recommend that a commitment be made in the Framework to identify how a mechanism for operationalising a shared framework exists through the PASS requirement to complete and record a comprehensive needs assessment should be developed and rolled out across all LAs and set a timeline for its delivery. As noted above this aspect does not appear to be covered in the review of support needs initiated under ‘Delivering Homes, Building Communities 2025-2030’ which focuses on health-related support needs in emergency accommodation.

xviii) Homeless HAP tenancies

A systematic Homeless HAP preventative protocol should be agreed, to be triggered whenever there are indications that a Homeless HAP tenancy is at risk, for instance, by irregular patterns of rent payment or complaints of Anti-Social Behaviour. Responses should involve assertive multi-disciplinary team engagement with tenants and case management. Given the investment of time and resources in supporting each tenant into a Homeless HAP tenancy, every effort should be made to deliver a ‘no return to homelessness’ practice, similar to that applied in Housing First.

xix) Introduce a new tenancy sustainment programme for families with complex support needs based on Housing First principles

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 needs. Alongside additional wraparound supports for 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. As discussed under ‘Upstream’ prevention, 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.

xx) Identify Employment and Education supports as a tool to prevent repeat homelessness

People experiencing homelessness, and people with experience of homelessness, have been consistently overlooked in employment activation policy. Through our Preparation for Education, Training and Employment (PETE) service, we work directly with people experiencing homelessness to support them into education, training, and employment. PETE demonstrates that with tailored, person-centred supports, people can overcome significant challenges and sustain employment.

The Framework offers the Department of Social Protection an opportunity to consider the importance of supporting individuals into meaningful employment as a key element of homeless prevention and reducing poverty. In our submission to the Pathways to Work 2026-2030 Public Consultation in 2025²⁰, we urged the Department of Social Protection to ensure that employment activation interventions are coordinated, inclusive, and responsive to the lived realities of people experiencing homelessness and recommend that the upcoming Pathways to Work strategy be linked with commitments in the Framework.

Data, Evaluation and Governance

The introduction of a Homeless Prevention Framework is an ambitious and welcome initiative. Important steps have already been taken in establishing cross departmental

²⁰ Focus Ireland (2025) [Focus Ireland Submission to the Pathways to Work 2026-2030 Public Consultation](#)

structures at senior staff and Cabinet level. While these governance structures are welcome and demonstrate a political commitment to this work, they are notable for the complete absence of the NGOs which universally provide the front-line services on which the initiative depends. The exclusion of the front-line services means that decision making is deprived of not only of an important perspective but also crucial knowledge about what is working and what is not. As the initiative goes through the challenges which are inevitable in any major project, the statutory decision makers are placing the NGO providers in potentially adversarial positions. NGOs are not seen as partners in solving homelessness but rather contractors to deliver services, with occasional invitations to make point-in-time submissions.

To change this approach will require a transformation of thinking across the statutory sector, and a comparable generous response from the NGOs. Two specific proposals would represent a first step in that transformation:

- The NGO groups on NHAC should be nominated to make two appropriate nominations to the ASG Group which is co-ordinating the Prevention Framework project
- NHAC should establish a 'Data, Research and Monitoring' sub-group with an independent chair, comprising relevant sectoral expert and local authority and NGO nominees.