

Submission by the MakeRoom Alliance on Development of New Homeless Strategy

Introduction

This submission is intended to input into the development of the new national homeless strategy that is in the process of being drafted by the Department of the Environment, Heritage and Local Government. Our organisations believe that the advent of a new strategy represents a potentially pivotal moment in the fight to end homelessness in Ireland. Its predecessor, 'Homelessness: An Integrated Strategy', led to important progress in this regard, and the ending of rough sleeping and long-term homelessness began to be viewed as a viable target moving forward. The Review of Implementation of Homeless Strategies (hereafter referred to as 'the Review') undertaken by Fitzpatrick Associates and published in 2006 acknowledged the progress made, but pinpointed a number of key issues that remained to be addressed. A key theme of the Review was the need for partnership in developing new strategy, with the relevant statutory bodies working together and alongside the community and voluntary sector in formulating future action. This collaborative working was deemed essential in order to generate an effective strategy, with the establishment of a National Homeless Consultative Committee recommended to facilitate this process. The setting up of this Committee and our representation upon it was warmly welcomed by our organisations and we intend to maximise the value of participation by ensuring that our views on the content of the strategy are articulated and fully taken into account.

This submission therefore details the core elements that our organisations believe must, as a minimum, be contained within the new strategy. It is intended to assist the strategy formulation process by providing a succinct, issue-by-issue description of the priorities moving forward.

National Homeless Consultative Committee

The Review recommended the establishment of a National Homeless Consultative Committee that would "provide input into the development of the revised homeless strategy and ongoing Government policy on addressing homelessness, including the development of improved funding

mechanisms and the integrated planning and delivery of interventions". Proposed Terms of Reference for the Committee were defined within the Review that envisaged participation in the development of new strategy "in an integrated manner, with individual actions identified, costed, partnership funding provisionally agreed, timescales set for delivery and monitoring and evaluation systems in place."

The Committee that has been established fulfils the objectives of the Review in terms of representation of providers of local homeless services, but we have some concern at the degree of influence it is exerting on the formulation of the new strategy. It is clear that the Review did not envisage that the Committee would serve merely as a proofing mechanism or as a consultation tool about very specific issues, but rather that it would be proactively involved in the identification and specification of particular priorities and actions. The material released to the Committee for feedback thus far has focused on the former types of activity, with little indication as to whether and how more significant input into strategy development will be facilitated. However the proactive involvement of organisations providing homeless services is essential if the new strategy is to be based on issues on the ground as they are developing and emerging. It is hoped that this issue will be addressed moving forward, with the key priorities identified below serving as a basis to begin meaningful discussion about the focus and content of the strategy.

Key Priorities for New Homeless Strategy

The Review contains a recommendation that the new strategy should include an overarching goal to eliminate long-term homelessness in Ireland by a defined date in the future. The MakeRoom campaign, endorsed by all political parties, envisages this date as 2010, with a very specific definition of what "ending homelessness" will mean. If this is to be achieved, our organisations believe a number of actions must be progressed as a matter of priority. These priorities are discussed below across a number of different themes: homeless service provision; provision of long-term housing: housing costs and rented accommodation; homeless service provision; person centred working; improved coordination; the legislative framework; and preventative actions.

Homeless Service Provision

Priorities

- Targeting of existing gaps in emergency service provision.
- Development of Cross-Department response to issue of homelessness among people from EU accession states as result of Habitual Residence Condition.
- More formal monitoring of application of quality standards, controlled via service level agreements wherever possible and clear, transparent funding procedures.
- Mechanisms for sharing best practice.
- Facilitation of access to homeless services for those with complex needs.

The Review stated that “emergency accommodation, although largely sufficient in major urban centres, should continue to be provided to address outstanding requirements in other areas.” The progress in terms of emergency accommodation provision since 2000 is acknowledged, but the new strategy should not neglect the substantial gaps that still exist in emergency services in some areas of the country. Many of our emergency service providers have been forced to turn people away due to a lack of capacity and there is a need to invest further in such accommodation to reduce the incidence of rough sleeping. Account must also be taken of the new challenges that have presented themselves in recent years that have placed significant pressure on emergency accommodation providers. A significant base of people seeking emergency services now originate from the EU accession states and are subject to the Habitual Residence Condition, precluding them from access to social welfare services and benefits. Their needs are generally, although not always, short-term and existing emergency accommodation is not designed to address their needs. There is a risk of this group of people becoming entrenched in a cycle of homelessness, with obvious potential impacts on service provision in the future. A lack of clarity about the status of such individuals has led to different approaches by providers in allowing access to emergency accommodation, although there is strong reluctance to turn any individual away when the only alternative is rough sleeping. There is a need for a coordinated cross-department policy response to ensure that interventions in relation to this group are adequately supported, and that the burden does not fall on homeless service providers with already stretched resources. In progressing this, it is important to recognise that this group does have genuine needs and, regardless of the impact of the Habitual Residence Condition, much migrant labour has been concentrated in low-paid employment, making them one of the most vulnerable groups at risk of social exclusion.

The new homeless strategy must also place emphasis on applying standards, disseminating best practice and establishing service level agreements in relation to homeless service provision. Most providers are committed to good quality standards in service provision and the Putting People First standards produced by the Homeless Agency are widely used around the sector, including outside of Dublin. However more formal monitoring of application of quality standards, controlled via service level agreements wherever possible, should be an objective of new strategy. The introduction of a licensing system for homeless service providers should also be given serious consideration. This will ensure delivery of quality interventions by those organisations that are compliant to such standards. In this regard the new strategy should ensure that, as recommended in the Review, “a more formal funding procedure should be developed in order to prioritise projects for funding, involving:

- Clear national criteria for project funding.
- A transparent funding assessment and approval process that relates all proposed projects against local homeless action plan targets.
- The setting of formal targets or service level agreements for each project, with an appropriate monitoring system put in place.”

The establishment of such a funding procedure should ensure that appropriate projects are adequately resourced, as many projects still remain understaffed and under-funded, limiting their effectiveness in addressing homelessness at local level. There is also a need for standardisation of remuneration and staffing based on client needs, as substantial variations are apparent across different providers in this regard. The Simon Brooke report ‘Work Worth Doing’ identified a series of disparities in this regard and full implementation of the recommendations within this report should be considered within the strategy.

The sharing of best practice was a key focus of the Review and it was recommended that regular homeless fora conferences are held and examples of good practice circulated. Provision for such action should be contained within new homeless strategy.

Organisations providing outreach and emergency facilities acknowledge that there are many people who, often due to a combination of addiction, psychiatric and subsequent behavioural issues, do not have access to quality services. There is a need to ensure that access to homeless services is facilitated for people with complex needs and that services do not focus only on those with lower support needs that require less intensive interventions in order to successfully progress out of homelessness.

Provision of Long-term Housing

Priorities

- Pursuit of NESC social housing targets and establish of dedicated Part V teams in local authorities to advance social housing provision.
- Provision of long-term supported accommodation with a revenue funding stream to allow providers to employ appropriate specialised staff.
- Establishment of agreements between local authorities and service providers to allocate a specific number of local authority units per annum.

The provision of sufficient social housing stock will be central to ensuring successful progression routes for people experiencing homelessness. The 'Towards 2016' Social Partnership Framework commits to the continued relevance of the NESC recommended targets of 73,000 additional social housing units provided in the period 2004 to 2012. 'Delivering Homes, Sustaining Communities', produced by the Department of Environment, Heritage and Local Government, also makes commitments to expanding and improving the quality of social housing stock. However it is imperative that the new strategy includes some provision to ensure that a sufficient proportion of such social housing is allocated to people experiencing homelessness. This must be facilitated by a concerted effort on the part of local authorities to deliver on their obligations in relation to social housing output. At present €60mn has been collected by Councils from construction companies in lieu of social housing but has yet to be invested in such accommodation. Action in this regard must be progressed and it is recommended that the new strategy identifies the establishment of dedicated Part V teams in local authorities with significant Part V developments to enhance the efficient and effective conclusion of Part V agreements.

The financial limits on the Capital Assistance Scheme are in need of review and the commitment by Government to examine this issue later in 2007 is to be welcomed. It is essential that this brings the current ceiling of 95% assistance into line with the 100% funding provided by the Capital Loan and Subsidy Scheme. This has significantly constrained development by homeless service providers of much needed accommodation in the past and taking this step will facilitate progress in this regard.

The provision of social housing must also include dedicated long-term supported accommodation with appropriate specialist staff for those individuals that are incapable of sustaining themselves in an independent living environment. There is a group of individuals

with mental and physical health needs where the only option is long-term group housing where such needs are met by live-in staff, trained to provide this particular support. Our organisations have invested considerably in the generation of such responses in recent years, but there remains a pressing need for further Government investment in this area to remove a significant blockage in homeless services due to the inability to move such clients on into long-term accommodation. In this regard the strategy should make provision for the introduction of a revenue funding stream for housing associations providing social housing in order to employ appropriate specialist staff to meet the support needs of clients.

The Review recommended that “local authorities should ensure that a proportion of their own and the voluntary sector’s housing stock is appropriate to the needs of their homeless population and that due account is taken of the needs of this sector in the operation of their housing allocation process”. With the formulation of new strategy, a significant opportunity arises to adopt a model of housing provision that can put in place a clear progression route out of homelessness and facilitate more effective planning of interventions on the part of homeless service providers. It is accepted by our organisations that use must be made of a number of different long-term accommodation options, including the private rented sector, in order to help move people out of homelessness. However these efforts would greatly benefit from the establishment of agreements with homeless service providers to commit to certain number of local authority accommodation units per annum, with an onus on providers to find alternative solutions to meet remaining move-on accommodation needs. The services would then be able to allocate the different move-on options to appropriate clients based on individual needs.

Housing Costs and Rented Accommodation

Priorities

- Expansion and improved administration of the rent supplement scheme with a review of appropriateness of existing rent caps.
- Comprehensive standards programme for private rented accommodation to protect tenants.
- Expansion of the Rental Accommodation Scheme and measures to improve its effectiveness.

There is now widespread acknowledgement that in order to facilitate progression routes out of homelessness options beyond local authority housing stock must be brought into consideration, including private rented sector accommodation. However, for the private rented sector to

serve as a sustainable solution for people that have experienced homelessness, there is a need for a number of reforms and interventions. The strategy should include a significant commitment to improved administration of the rent supplement scheme. More than 60,000 people in the private rented sector depend on this assistance, yet accessibility to the scheme is often problematic and delays occur that can then result in temporary homelessness, placing avoidable pressure on existing homeless services. A key development would be the payment of rent supplement rather than arrears as this is a key barrier that contributes to discrimination against tenants in receipt of such assistance by landlords. In tandem, there must also be a review of existing rent caps in order to reflect the real cost of renting. A recent trend resulting from high housing costs in Ireland has been a significant base of people that are at risk of homelessness despite being in full-time employment. This 'working poor' phenomenon needs to be taken into account in homeless policy, particularly from a preventative perspective, and it is recommended that rent supplement be extended, on a means tested basis, to people working more than 30 hours a week. Our organisations would also like to see the strategy contain reference to the plans of the Department of the Environment, Heritage and Local Government for pilot schemes to deliver affordable rented housing to the 'working poor'.

The strategy should also consider the issue of standards of accommodation in the private rented sector. Standards of accommodation in the private rented sector are beneath acceptable standards and this makes it difficult for people that have experienced homelessness to sustain themselves within this living environment. A comprehensive standards programme to protect all tenants is essential, incorporating the following elements:

- Updating existing minimum standards regulations.
- A self certification system whereby a landlord must certify with the Private Residential Tenancies Board (PRTB) that a property complies with minimum standards and is fit for the purpose of renting - an 'NCT' for housing.
- A well-resourced local authority inspection programme.
- Better quality information on fire safety enforcement and the enforcement of minimum dwelling standards to measure progress.

The publication of the Action on Private Rented Accommodation Standards by the Department of the Environment, Heritage and Local Government, detailing a series of commitments in this regard, in September 2006, was a welcome development in beginning to address these issues. The commitments must however now be progressed as a matter of priority with timeframes stipulated for delivery within the new homeless strategy.

Although the advent of the Rental Accommodation Scheme appeared to offer significant potential in supply of long-term accommodation solutions to people experiencing homeless, there has been limited success thus far in terms of its roll-out. The expansion and improved effectiveness of the scheme should be a matter of priority for new homeless strategy.

Person-centred Working

Priorities

- Mechanisms to ensure engagement by statutory services in delivering a case management approach via homeless services.
- Ensuring access by people experiencing homelessness and those that have progressed out of homelessness to services of new primary health care teams.
- Standardised housing needs assessment process in every local authority as a statutory duty and conducted on an ongoing basis.

Person-centred working was a key theme of the Review and our organisations have longstanding commitments in place to adopting case management, keyworking approaches for all our service users. Controls should certainly be put in place to ensure that this is the case across all providers. A case management approach is however dependent on the availability of external services and this is an area that requires significant attention in the new homeless strategy. The Review's recommendation that "arrangements should be put in place to ensure that the needs of the homeless person are met in a holistic manner" will require a greater level of engagement by statutory agencies with homeless services at local level, and the strategy must ensure that mechanisms are in place to facilitate this. Ensuring that new primary health care services are accessible to people who are homeless will be an important priority. Full integration of people who have been homeless into their primary care teams in their communities will also be important, with increased investment in community supports required.

An important barrier to progress in this regard is the inadequacy of the existing Housing Needs Assessment process within local authorities. Although a Housing Needs Assessment is required to be undertaken by all local authorities every 3 years, there is substantial inconsistency in approach to this exercise. A standardised housing needs assessment process needs to be put in place in every local authority and conducted on an ongoing basis. The new strategy should progress this and establish a clear statutory duty on local authorities to assess housing need. It

is also important that this duty, and the systems put in place, comply with the principles of human rights legislation. This must include putting clear and transparent appeals mechanisms in place to underpin the rights on the individual being assessed in each instance.

Improved Coordination Between Statutory Bodies

Priorities

- Stronger proofing mechanisms to ensure that Government policy does not adversely impact upon homelessness.
- Coordinated funding mechanism, with clear responsibility on local authorities to meet people's housing needs and responsibility on HSE to meet people's care or support costs.
- Multi-annual funding with allocations from statutory agencies delivered to service providers in a more timely manner.

Our organisations welcome the Review recommendation to proof Government policies against impact on homelessness, yet highlight the inadequacy of the current policy proofing mechanism in failing to consider the impact in this regard of the Habitual Residence Condition and Rent Supplement Caps. These policy developments have had significant implications for homelessness as noted within this submission. The strategy must therefore make provision for stronger proofing mechanisms to be put in place moving forward, with formal systems for undertaking poverty impact assessments put in place.

The work of the Cross-Department Team on Homelessness in agreeing the coordination of capital and revenue funding to address issues relating to homelessness will be a critical success factor in determining whether new homeless strategy will be effective. As recommended within the Review, "the revised homeless strategy should establish a coordinated funding mechanism for the disbursement of capital and current accommodation and care related costs". Out of this process, there must be clear responsibility on local authorities to meet people's housing needs and responsibility on HSE to meet people's care or support costs. It is also important that such funding is provided on a multi-annual basis and is delivered to service providers in a more timely manner. Our services often receive allocations for the calendar year as late as September and therefore have to find alternative resources to support staff until this funding arrives. This can prove extremely difficult, with voluntary boards taking unavoidable risks, and this in turn makes planning and development of services extremely problematic.

Legislative Framework

Priorities

- Clarification of target to end long-term homelessness by 2010.
- Establishment of clear, agreed definition of homelessness that takes account of different layers of housing need.
- Introduction of statutory local homeless action plans.
- Government commitment to deliver social and economic rights as a central component of homeless strategy.
- Review of 1988 Housing Act.

The expressed commitment to end long-term homelessness by 2010 must be backed within new homeless strategy by a clear definition of what equates to homelessness. The Review recommends that “The definition of homelessness should be revisited in order to produce a clearer, unambiguous understanding of what homelessness means for measurement and funding purposes. This should be used as the basis for a common information gathering system establishing the causes, extent and nature of homelessness and rolled out to all areas of the country”. The National Homeless Consultative Committee has established a data sub-group that will focus on the latter of these issues, but there is a need for the definition issue to be addressed as a matter of priority within the new strategy.

The MakeRoom campaign has taken a lead in terms of defining what ending homelessness means by equating it to “no one will have to sleep rough because of a lack of appropriate services, no one will have to live in emergency accommodation for longer than is an emergency and no one will become homeless due to a lack of services or inadequate housing provision”. The new strategy can learn from this by being more specific about exactly what ending long-term homelessness means. It should also be acknowledged that there are many layers of housing need, and the new strategy should aim to set out a definition that recognises such different layers. It should take account of those people living in insecure accommodation, such as those residing temporarily with friends or family and those people living in inadequate or overcrowded accommodation.

The Review notes that the production of local homeless action plans should be made on a statutory basis. This is an area of concern for our organisations, and we believe that the new homeless strategy should go further by committing to the actual plans being statutory. It is certainly essential that there are tight control mechanisms in place to ensure that these plans

are produced in all areas of the country via a defined partnership process. Strong action plans have been shown to lead to more effective interventions in the past and they should serve as a key coordinating mechanism for the realisation of strategy objectives in the future.

Our organisations believe that there is a need for Government commitment to deliver social and economic rights as a central component of homeless strategy. Government have acknowledged that rights encompass social, economic and cultural rights and obligations and that these should underpin equality of opportunity and policies on access to education, employment, health, housing and social services. However, despite very specific commitments as to how this would be progressed no action has been taken to date. An explicit statement of entitlement to these services and mechanisms to monitor access to services should be central to the formulation of any new homelessness strategy.

The above steps should all be incorporated within new legislation proposed within new homeless strategy. The Department of the Environment, Heritage and Local Government flagged the need for new legislation on the back of the Review and this has yet to progress. Indeed our organisations believe that the drafting of new legislation should be linked to a full review of the 1988 Housing Act in order to reflect the overall thrust of Government policy and in particular efforts to ensure equitable and client centred service provision.

Prevention

Priorities

- Research on routes into and out of homelessness.
- Development and funding of early intervention preventative actions.
- Introduction and control of more effective discharge policies for people leaving mental health and acute hospitals.
- Closer links between agencies working with youths and adults experiencing homelessness and more investment in aftercare for people experiencing homelessness when they become 18 years of age.

The new strategy is intended to take on the function of the previous Integrated and Preventative Strategies and clearly prevention of homelessness must therefore be a key theme within the document. In the discussions during the National Homeless Consultative Committee meetings held thus far it would seem that there has been a lack of focus on prevention in the development of new homeless strategy and this must be addressed moving forward.

A good starting point in progressing action in relation to prevention would be more comprehensive research into the routes into and out of homelessness. This would allow the causes of homelessness to be more clearly established and appropriate preventative actions to then be developed. A closer understanding of the situation in this regard is clearly needed given the relatively limited success of the Homelessness Preventative Strategy and the new strategy should attempt to address this.

The Review identified a series of recommendations in relation to preventative actions that now need to be pursued within the new homeless strategy. First and foremost there is a need for development and funding of early intervention preventative actions. There are a wide number of family support activities being delivered around the country and these should be used and built upon to act as early warning systems with regard to homelessness, with linkages developed between resources and additional family support initiatives introduced where gaps currently exist. Early intervention strategies should include the establishment of indicators that act as an early warning system and should as far as possible try to offer supports while the potentially homeless individual remains in the family home.

Significant concern was expressed in the Review about the effectiveness of the discharge policies that have been put in place in health and residential care facilities. The services delivered by our organisations are placed under significant pressure by the release of individuals experiencing homelessness from these facilities that thus require to access our accommodation or supports with little or no notice, insufficient attention as to whether they are linked into appropriate specialist services upon discharge, and no coordination with our service providers to indicate the needs of the individual. More effective and consistent discharge policies will be essential in the future and there is a need for a dedicated system to ensure that these policies are adequate and being implemented effectively in mental health facilities and acute hospitals.

A further problem flagged by the Review in which we have seen little progress has been the establishment of closer links between agencies working with youths and adults experiencing homelessness. There is limited evidence that the recommendation that closer links should be developed between the Youth Homeless Forum and Adult Homeless Forum in each area has been progressed, and indeed it would appear in many areas that there is a lack of momentum behind the Youth Homeless Strategies that were developed. There is still insufficient attention to aftercare by agencies working in the area of youth homelessness and a wide range of

different approaches at local level to coordination of a continuum of care procedures with regard to an individual reaching 18 years of age. The need for such interventions is reinforced by recent research undertaken by the TCD Children's Research Centre in both Dublin and Cork. The new homeless strategy must focus strongly on stimulating such aftercare activity, increasing links between agencies and for a working on youth and adult homelessness and developing formal, monitored continuum of care processes at local level.

Moving the Strategy Forward

Our organisations believe that there is a need for a formal commitment on the part of the Department of Environment, Heritage and Local Government that the priorities identified across the themes above will be included within the new homeless strategy that is produced. The vast majority of the proposals above are based on either the recommendations of the Fitzpatrick Associates Review, accepted by the Minister of Housing, the objectives of the MakeRoom campaign, endorsed by all political parties in Ireland, or the commitments made in the social partnership framework, 'Towards 2016'. This step would therefore be entirely consistent with existing Government policy.

In helping to ensure that new strategy reflects these priorities and is based on the partnership approach recommended in the Review, we would also like clarification on the exact role of the National Homeless Consultative Committee in development of the strategy, with identification of where our input will be facilitated and the degree to which the Committee will be able to impact on the actual content of the strategy. It would also be of great assistance if, at the earliest opportunity, the Committee can clarify the structure and broad content of the strategy with the Department, and the exact timeframe for delivery. This will facilitate the meaningful dialogue in forthcoming Committee meetings that will ensure that all parties can move towards their common objectives of ending long-term homelessness in the coming years.