



**Simon Communities of Ireland
Homeless Strategy Implementation Plan Submission**

September 2008

Published by:
SIMON COMMUNITIES OF IRELAND
ST. ANDREW'S HOUSE, 28-30 EXCHEQUER STREET, DUBLIN 2
T: (01) 671 1606 E: info@simoncommunity.com

Simon's 10 Point Plan for Implementation of the National Homelessness Strategy

Introduction

The Simon Communities of Ireland broadly welcome the Strategy and believe certain elements will be extremely helpful in terms of prevention and assistance to people already experiencing homelessness. We welcome the continued commitment by government to the eradication of the need to sleep rough and to reducing the length of time people have to stay in emergency accommodation by 2010.

Furthermore, we support the commitment to meet the long-term housing needs of people experiencing homelessness and the further development of locally and regionally based Homeless Fora and Local Management Groups with responsibility for devising and implementing local Homeless Actions Plans.

We recommend the following 10 Point Plan for the development of the Implementation Plan to accompany the Strategy. In addition, we highlight specific areas of the strategy, which must be prioritised if the Strategy is to achieve its strategic aims.

1. Departmental/Agency Responsibility

- There needs to be an identification of the government department and/or agency with responsibility for the delivery of each action.
- This Implementation Plan must allow for better management of the policy interface between this Strategy and other policy areas, structures and strategies.
- It is essential that local and regional Homeless Fora are adequately resourced so that they can have the greatest impact on homelessness at a local and regional level.

2. Timelines

- It is essential that there are specific timelines for delivery and implementation of each action.

3. Funding

- All Strategy actions must be 'costed' and where additional funds are required the source of such funding must be identified and the funding allocated.
- Revenue and capital funding must to be provided for the full four years of the strategy and index linked.
- The governments existing social housing commitments must be met.
- The value for money exercise underway is welcomed but not at the expense of service provision and quality. It is critical that 'quality of life' measures are incorporated into any such exercise.

4. Stakeholder Involvement

- It is essential to have full 'buy-in' from all key stakeholders including the voluntary sector in the development and implementation of this Implementation Plan and the Strategy as a whole.

5. Monitoring and Evaluation

- A commitment to formally monitor and evaluate the effectiveness of the strategy is critical. This should be included in the terms of reference of the National Homelessness Consultative Committee.
- It is essential to identify the appropriate Key Performance Indicator's for each action.

6. Quality Standards and Good Practice Models

- It is essential that the voluntary sector providers to have meaningful input into the development and monitoring of quality standards, good practice models and other such guidelines referred to throughout the strategy.

7. Definition of Homelessness

- We regret that a review of the statutory definition of homelessness will not be undertaken.
- However, we welcome that the commitment to review the definition for operational purposes with reference the ETHOS¹ typology.

8. Measuring Homelessness

- We believe that the Central Statistics Office (CSO) should be asked to develop, implement and monitor an improved data gathering mechanism to ensure timely, accurate information on homelessness across Ireland.
- The CSO should measure not only housing needs of people experiencing homelessness but also health status and other needs.

9. Tenancy Sustainment and Settlement Support

There is a reasonable focus on Tenancy Sustainment within the Strategy and the definition is comprehensive. However there is a need for

- Ongoing provision for those who require long-term, medium to high support accommodation.
- There are some for whom independent living is not a realistic option and thus their long-term needs must be provided for.
- A 'preventative tenancy sustainment service' working with 'at risk' households and individuals at local and regional level.

10. Emerging Needs

- It is critical that the Implementation Plan has sufficient flexibility to respond to needs as they arise and also the changing economic environment.
- The possibility of a rolling 'Emerging Needs Fund' should be explored.

¹ See the p 84 of the Strategy or visit www.feantsa.org for a full description of the ETHOS typology

Specific Strategy Areas

Prevent Homelessness (Aim 1)

Preventative measures identified in the Strategy are vague and ambiguous.

- Preventative measures must be clear, focused, targeted and adequately resourced.
- The New Strategy must include provision for pilot initiatives, which can be assessed and evaluated before 'roll out'.

Eliminate the Need to Sleep Rough (Aim 2)

- There must be sufficient numbers of emergency beds to meet needs of people presenting to emergency accommodation on a nightly basis.
- There is an apparent contradiction between aims 2 and 3 (see below for aim 3). To eliminate rough sleeping it is essential to have a sufficient supply of emergency accommodation thus no resources should be transferred away from emergency provision at this point. It is critical that activities under both these strategic aims happen in parallel.

Eliminate Long Term Homelessness (Aim 3)

- The new Strategy fails to identify appropriate move-on options for a significant number of people in emergency accommodation with a broad and complex set of needs.
- Independent living is not a realistic option for all thus the Implementation Plan must establish a balance between providing for move-on options and providing a range of support options from low to high level care e.g. 24/7 for those who will always need such option.
- Services must be resourced to meet the medium to high support needs of such individuals on a long-term basis at local and regional level.

Meet Long Term Housing Needs (Aims 4)

Social Housing Provision and Local Authority Housing

- The Implementation Plan must recommend an immediate increase social housing output to meet National Development Plan (NDP) targets, restated in the Social Partnership agreement Towards 2016, of meeting the housing need of 60,000 households between 2007-09. A sizable proportion of this output should be allocated to people progressing out of homelessness.
- In addition, the Implementation Plan should allow for agreements between Councils and homeless service providers to commit to provision of a certain number of local authority accommodation units per annum for clients of that service ready to move-on.

Rental Accommodation Scheme (RAS), Rent Supplements and Rent Caps

- There needs to be a concerted focus within the Implementation Plan on how the RAS will be used practically to assist people moving out of homelessness.

- Current rental amounts are not realistic in terms of market rent and thus local area rents need to be reviewed and set at appropriate levels, taking account of the information held by Private Residential Tenancies Board (PRTB), to provide a higher rate of rent supplement for areas where the market rent is above the average.

Ensure Effective Services for Homeless People (Aim 5)

- There needs to be a greater understanding of the range of complex and multi-faceted needs of those experiencing homelessness including physical and mental health issues, and drug and alcohol use, and interaction between these needs.
- The Implementation Plan needs to indicate how these needs will be practically met in the short, medium and long term.

Better Coordinate Funding Arrangements (Aim 6)

Capital Assistance Scheme (CAS)

In relation to CAS it is critical that there is

- Local representation on Assessment Boards, including participation by the Community and Voluntary Sector, and an open transparent assessment process with a clear appeals procedure.
- Reassessment of recent changes to CAS, which make the application process increasingly difficult and bureaucratic.
- When CAS funding is made available that the associated revenue funding is available concurrently.

Habitual Residence Condition (HRC)

- There must be acknowledgement within the Implementation Plan that the HRC is putting people at risk of homelessness, leading to increased levels of rough sleeping and putting increased pressure on already overstretched homeless services.
- It is critical to safe- guard the discretionary powers of Community Welfare Officers (CWO's) in general, and in this specific context.

Conclusion

The Simon Communities of Ireland firmly believe that the Homeless Strategy can achieve its aims but only if the points outlined in this document are addressed in the forthcoming Implementation Plan. We also take this opportunity to reiterate our support and commitment to working together with all of the key players - policy makers, statutory agencies, and community and voluntary groups - in the development of this Implementation Plan and in tackling and responding effectively to homelessness in Ireland.