

Introduction

The Simon Communities of Ireland welcome the DoEHLG proposed announcement of two schemes for people experiencing homelessness who are progressing along a pathway to independent living. The focus on those living in emergency accommodation for longer than six months is particularly welcome. We also support the flexibility proposed in the two schemes to move support around to those who need it most. We appreciate the open consultation process with the opportunity to provide feedback on both schemes and we look forward to working with the DoEHLG and the NHCC further on the detail of same.

We do have some observations and questions in relation to the details of both the Supported Living Initiative (SLI) and the Homeless RAS Initiative (HRI) in the document circulated. We hope they will be beneficial in the development of both schemes.

Observations and Questions in relation to the SLI and HRI

Emergency Provision

The document identifies the target group for the SLI scheme as those in emergency or transitional accommodation. There is no acknowledgement in the document that there are different types of such accommodation.

- The term emergency accommodation is ambiguous in this context. Does it refer to private emergency provision or does it mean all emergency provision including voluntary sector emergency provision.

This clarification is critical as it has implications in terms of the savings that will be accrued. This point is returned to below.

Funding

Funding details remain ambiguous.

- Funding details are only included for the roll out of the SLI scheme which the document states will be funded entirely through the proceeds of savings on emergency accommodation that is vacated as persons move to their mainstream accommodation. How will the 5% increase in funding for homeless services in 2009 be spent?
- The funding paragraph states 'The scheme will be funded entirely through the proceeds of savings on emergency accommodation that is vacated as persons move to their mainstream accommodation. A proportion of the current funding available to DEHLG for homelessness will be ring-fenced for this purpose'. The meaning here is unclear.
- How will the SLI scheme be self-funding and how will savings apply for:
 - Non-private emergency provision where savings will not be so great. In such settings the provision of emergency accommodation in designated homeless

hostel settings has fixed costs attached in terms of staffing and other overheads for the services to operate.

- Emergency provision in the voluntary sector where such service provision is generally subsidised.
- What about situations where a place in emergency accommodation will have to be, for the time being, retained. For example, when a person moves out of emergency accommodation but the vacancy is filled by another person i.e. someone who is sleeping rough.

Any saving accrued though these schemes must be retained as part of the budget for homeless services. These savings should be used to support the development of these schemes in parts of the country where they are required but where savings do not occur or are not substantial enough to support such development and the roll out of other actions outlined in the Homeless Strategy 'The Way Home'.

Sourcing Suitable Accommodation

- What accommodation is currently available nationally to bring such schemes into operation? And where is this accommodation located? The considerable experience and success of the Simon Communities around the country indicates that small units of city centre based apartments work best in terms of tenancy sustainment/support.
- Is the available accommodation suitable for single people i.e. apartments rather than houses? For example the experience of some services operating on the ground is that smaller sized units suitable for single person households are at a premium in the private market and the affordable housing units are predominantly in the form of 3 bed units.
- How will dwellings assigned for use under the scheme be deemed suitable to address the needs of people who are homeless? Will criteria be developed? We would welcome the opportunity to contribute to the development of same.

Assessment

- What will the assessment criteria be? We would welcome the opportunity to contribute to the development of criteria.
- Will there be guidance available to those conducting these assessments? The document mentions that the Homeless Agency in Dublin will be developing guidelines we would like an opportunity to contribute to the development of these guidelines.
- How will this assessment process link into the Care and Case Management processes in place?
- Who will undertake the assessments?
- What if the service provider does not agree with the findings of an assessment?
- Will the common assessment form be used as basis for allocating both accommodation and support?

Support

Defining Support

The document mentions low and medium support without any reference to what they mean. These terms are very subjective thus it is important to define from the onset what is meant. This will be particularly important when drawing up guidelines for the assessment process.

- How will low, medium and high support be defined, will it be in terms of staff hours or support needs?

Flexibility of Support

Homelessness can be episodic in nature. The ultimate aim of both of these schemes is to support people in their move to, and to remain in, independent accommodation thus exiting the cycle of homelessness for good. Therefore, for these schemes to succeed it is critical they are responsive to changing needs and crisis situations. In a positive way this can be the reduction of support downwards from medium to low support levels, eventually tapering off. However, in some circumstances this can also mean continuation or intensification of support if the person is at risk of losing their tenancy, faced with a crisis or there is deterioration in health status.

- How flexible will the support be to respond to changing need and circumstance?
- Will there be an early warning system in place to assist in identifying when somebody is in difficulty and to facilitate the intensification of support or an alternative appropriate response.

Linkage between Housing Support Teams and other Support Systems

There is acknowledgment of the interagency collaboration which is required to respond effectively to homelessness in the Homeless Strategy National Implementation Plan, however, this is not clear in this document. People may be assessed as having low to medium support needs but need support in terms of their wider health and social care needs.

- How will Housing Support Teams link with, and make referrals to wider services and support e.g. health services including mental health services (Primary Care Teams, Social Care Networks), drug and alcohol services, probation and welfare services, employment and training services.

Target Group

The document clearly states that the target group for the HRI is 'persons with low or no support needs', and that the target for SLI is 'households with low to medium support needs'. There is an absence of any detail of how the needs of those with higher support needs/complex needs are to be met.

- Where will people homeless for longer than 6 months with complex or high support needs be housed, and how will their support needs be met?

Refusals of Offer

When a refusal of an offer occurs it is important to explore why the offer may have been refused and the appropriateness of the offer in the first instance. The document mentions that

‘Procedures will also be developed to deal with situations where people refuse to accept the offer of accommodation despite been considered eligible’.

- What will these procedures be? And what will the alternative be for the individual?
- How will these schemes work alongside the Government’s other objective - the elimination of the need to sleep rough by 2010 and the importance of maintaining high quality emergency provision for those who need such an option?

Roll-Out Nationally

The scheme appears to favour Dublin. The extent of the homelessness in the greater Dublin area is well documented however, so too is that fact that people tend to migrate to urban centres in pursuit of services. The homeless strategy has a very clear focus on local responses through the development of Local Fora and Local Homeless Action Plans. Such schemes will be critical to the development of responses at a local level so people are not forced to leave their area and can remain connected to their existing support networks.

- Outside of Dublin, where will schemes be rolled out and when?
- In areas of the country where there is limited or no spend on private emergency provision how will the development of such schemes be resourced?

Competitive Tendering Arrangements

The idea of competitive tendering is welcome but transparency is critical. Reference is made to ‘the potential to promote greater competitiveness and value for money in the overall scheme’

However, there is no mention of quality service provision, quality of life and outcome measures. These are critical for the success of both schemes and must be built into the assessment criteria for the competitive tendering process from the start.

- Will guidelines for the competitive tendering process be developed nationally? We would welcome the opportunity to contribute to the development of such guidelines.

RAS

- What has been learned from the roll out of the RAS pilots? It is critical that this learning is integrated into the plans for the development of HRI. There is the mention of the review of current RAS pilots but there is an absence of detail - when will this happen, who will carry out the review, how will the review be undertaken? We would welcome the opportunity to contribute to the review process.
- What extra provision is being made to monitor and assess standards of properties of private rented accommodation used by RAS?

Security of Tenure

Security of tenure is an issue to those housed under both schemes. Some thought needs to be given to this from the start in the interest of prevention in the longer-term.

- What are the contingencies when a fixed-lease comes to an end and there is no potential for extension?

Social Housing Waiting List

- Will people accommodated through these schemes remain on the social housing waiting list and receive an allocation in due course?

Review and Evaluation of New Schemes

One of the central tenets of the Homeless Strategy National Implementation Plan is the development of a data and information strategy. It is critical that these schemes have review and evaluation processes built in from the start to ensure that they are meeting established and continuing need in the best possible way, taking into account quality of life and outcome measures. Such process should involve qualitative data collection and integrate the views and experiences of those housed under the schemes. As with all data collection it should be valid, appropriate and timely with the appropriate expertise assigned including voluntary sector participation throughout the process.

Language and Clarity

Some of the language used in this document is harsh and prescriptive e.g. 'Homeless service providers will be required to co-operate fully in the selection of tenants etc'. In addition, at times the document is not very accessible and easily understood. The example of the funding paragraph is mentioned above. It is important that all proposals and documents are presented in the most lucid manner possible to continue to foster the spirit of consultation and cooperation as the success of the scheme/s rely on the involvement and support of homeless services providers across the country.

Conclusion

Once again the Simon Communities of Ireland would like to reiterate our welcome and support for the development of SLI and HRI. We believe the development of these schemes, with the appropriate support, present a real opportunity to increase the options available for people who are homeless across Ireland and to move closer to the achievement of the 2010 commitments. We realise we are asking many questions but we highlight our full commitment to working closely with all concerned to get the detail of the schemes right and to support people to move and critically remain in independent accommodation for good. We would welcome the opportunity to comment further on both schemes in the future.