



**Presentation to the
Joint Committee on the Environment, Heritage and Local Government
from the Simon Communities of Ireland
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Delegation

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Introduction

Simon Communities of Ireland very much welcomes the opportunity to meet with this Committee today and we thank you for taking time from your busy schedule.

The Simon Communities throughout Ireland provide the best possible care, accommodation and support for people experiencing homelessness and those at risk. Together, with people who are homeless, we tackle the root causes, promote innovative responses and urge the government to fulfil their commitments.

Simon delivers support and services to almost 5,000 people who experience – or are at risk of – homelessness every year.

The Simon Communities of Ireland is an affiliation of local Communities in Cork, Dublin, Dundalk, Galway, the Midlands, the Mid West, the North West and the South East. In addition, the National Office performs a coordinating role in terms of campaigning in the areas of housing/homeless policy and the wider poverty and social inclusion agenda; best practice in service delivery and working with people who are homeless; and in the area of full time volunteering promoting excellence and providing accredited training.

Current Context

We are acutely aware of the pressures associated with the current fiscal crisis and the fact that difficult decisions must be made. However, we wish to highlight a number of issues based on our knowledge and experience in working with people who are homeless and at risk of homelessness across Ireland for almost four decades:

Government Commitments to end rough sleeping and long term homeless by 2010.

The Government has pledged the following:

- To end long-term homelessness (the occupation of emergency accommodation for longer than 6 months) by 2010. This commitment was included in the Towards 2016 Social Partnership Agreement and is restated in the Government's Homeless Strategy 'The Way Home' published Aug 2008. This commitment was confirmed in the renegotiated Programme for Government (Oct 2009).
- To eliminate the need to sleep rough by 2010. This commitment is clearly articulated in the Homeless Strategy 'The Way Home'.

This Government has consistently repeated its commitment to protect 'poor and vulnerable people'.

The Way Home – A Strategy to Address Adult Homelessness in Ireland - offers a blueprint to facilitate the realisation of these key commitments.

The Homeless Strategy with the Homeless Strategy National Implementation Plan is a blueprint to achieving the Government's key commitments. This blueprint includes a range of other commitments, including prevention, meeting the long term housing needs of people progressing out of homelessness, ensuring effective service provision and improving funding arrangements.

The Homeless Strategy National Implementation Plan must be updated on an annual basis, tracking activity to date and assigning timelines and departmental/agency responsibility for the delivery of the remaining actions. This process should include all key players, including the voluntary sector. We have not yet been involved or informed of such a process. It is imperative that there is an updated version for Jan 2010 (especially in light of the aforementioned commitments) and it is essential that this process begin without delay.

There have been significant gains in this area in recent years and we particularly acknowledge the commitment of the current Minister of State for Housing and Local Services, Micheal Finneran, TD, his staff and the officials in the Department of the Environment, Heritage and Local Government working in this area. The Way Home recognises that homelessness is a cross cutting issue and that solutions are dependent on coordinated action and intervention across a range of Government departments and agencies. In addition, the acknowledgment that people who are homeless will need support to move out of homelessness in the development of the Supported Living Initiative (SLI) is a real breakthrough. However we do have some concerns with this scheme which my colleague Niall Mulligan will come to later.

The National Homeless Consultative Committee (NHCC) has a key role to play in ensuring the success of The Way Home and the National Implementation plan as acknowledged in the plan itself.

Its [the National Implementation Plan] success will be influenced, to a significant degree, by all of the relevant agencies working in an effective and integrated manner, at national level through the Cross Departmental Team on Homelessness (CDT) and the National Homeless Consultative Committee (NHCC), and at local level through the local homeless fora. (Homeless Strategy National Implementation Plan; page 6).

The Terms of Reference of the NHCC require urgent review and updating to allow the Committee to have more of an active involvement in monitoring and influencing the implementation of the plan. In addition, the Committee should meet more frequently, especially in the run up to Dec 2010, ideally on a monthly basis. We currently participate in this Committee and would welcome a more active role for us and our voluntary sector partners.

We wish to reaffirm the necessity of all the key players including the HSE, the Office for the Minister for Drugs, the Department of Social and Family Affairs, and the Department of Enterprise, Trade and Employment engaging in the full implementation of the Strategy to ensure that the 2010 commitments are achieved. We reiterate our support to work with all parties to realise these goals.

The recession means more people are at risk of homelessness, more people will become homeless and more people will turn to the Simon Communities for support.

Homelessness was a serious issue in Ireland before the economic downturn but the current recession is exacerbating this issue. The link between homelessness, poverty and social exclusion is widely acknowledged nationally and indeed internationally. Homelessness impacts most on people who are on the margins with fewer resources in the first place, people who may have experienced homelessness in that past, people on low incomes, and people with little job or housing security who quickly run out of options.

My colleague Niall Mulligan will talk about the current pressures on the Simon Communities around Ireland later in this presentation.

Complex Needs¹ and Long Term Solutions

Housing is important, but homelessness is about more than housing; it is about physical and mental health, it is about drug and alcohol use and it is often about complex needs.

There are many different reasons why a person becomes homeless, but generally the explanation lies in a combination of structural factors (such as poverty or unemployment) and personal factors (such as family breakdown or health issues). What is clear is that once a person becomes homeless, the deterioration in their physical and mental health is both rapid and debilitating. People who have experienced homelessness die at a younger age. Problematic drug and alcohol use amongst people who are homeless is high. In addition, some people who are homeless have a range of complex (multiple) needs. Such needs are often interconnected; therefore holistic responses are critical to respond to all these needs simultaneously. It is this group of people – some of whom need high levels of round-the-clock care – that have nowhere else to turn but Simon.

A Health Audit Sick and Tired of Homelessness - A Health Profile of People Using Cork Simon² was conducted among all 183 people using Cork Simon services during the first week of September. This snapshot found the following:

- 58% had a diagnosed mental health condition.
- 48% had a diagnosed physical health condition.
- 77% had either a diagnosed physical or mental health condition
- 82 percent reported using alcohol, almost half of which were described as heavy users.
- 39% reported using drugs, 40 percent of which were described as heavy users.
- 36% used both alcohol and drugs, 37% of which were described as heavy users of both.
- Fifty two per cent of those with a diagnosed mental health condition also used alcohol and/or drugs.
- 87% had a medical card and 63% were in receipt of a Department of Social and Family Affairs disability payment.

¹ People with complex needs can be defined as having "...multiple interconnecting needs that span medical and social issues. Individuals with 'complex needs' may have mental health issues, combined with substance misuse problems, and learning disability. At the same time they may experience social exclusion, such as living in poor housing, with few opportunities for meaningful activities and leisure". (Rankin & Regan. (2004) as cited in Cox, G. & McVerry, P. (2006) 'Social Care & Drug Users in Ireland'. Policy Paper 2. Drug Policy Action Group. Dublin)

² About Sick and Tired of Homelessness – A Health Profile of People Using Cork Simon: This Health Audit was conducted among all people using Cork Simon services during the first week of September 2009 to build a picture of some of those needs and to highlight the complex nature of homelessness among people using those services. Sick and Tired of Homelessness records diagnosed mental and physical health conditions, alcohol and drug use, behaviour issues and referrals to the Adult Homeless Multi Disciplinary Team (AHMDT).

Responding to the needs of this particularly marginalised and vulnerable group of people requires appropriate accommodation, requires high levels of health and social care, requires time and patience. Everyday Simon sees the positive results; people getting back hope, getting back their lives, getting back to their communities. However, The Way Home provides no clarity or real detail on how the needs of this particular group of people will be addressed.

The long-term accommodation and support needs of people who are homeless are not currently being met. The 2010 commitments cannot be met until accommodation and health and social care needs are addressed.

Ideally, emergency accommodation would only ever be used in case of emergency but this is often not the case. Due to a lack of suitable long-term accommodation options, people often spend long periods in emergency accommodation. Fortunately current government policy is seeking to change this, as mentioned, plans are underway to respond to those who have low to medium support needs both in terms of accommodation and support. However, many of the people who are long term homeless have high levels of need – mental health, physical health, problem drug and alcohol use, fractured family relations, education and training needs – how their long term accommodation and support needs will be addressed remains unclear. Addressing long-term accommodation needs will in turn help to address rough sleeping. The 2010 commitments will not be met until long-term needs and those of people with complex needs are specifically targeted.

To adequately address homelessness a range of responses and options are required including:

Social housing: It is essential that the Government provides the number of social houses it has promised and that all local authorities around the country ensure that a portion of their housing stock, whether owned or leased, is available to people who are moving out of homelessness. The impact of the recent policy shift towards long term leasing remains to be seen. As yet it is unclear what the fate of people whose homes are leased by local authorities will be once a lease ends. Security of tenure for all living in any form of social housing is critical to the quality of life of individuals, families and communities.

Private Rental Accommodation: This is an option for some people ready to move out of homelessness, it may not suit all particularly those with complex needs. It is important that there are flats, apartments and houses with low rents available.

Rent Supplement Scheme

This is a supplementary allowance available to those who cannot cover the cost of rental accommodation from their own finances. Changes in the operation of this scheme as part of budget 2009 and the Supplementary Budget 2009 have put increased financial pressure on people and families on low incomes increasing the risk of homelessness. (There is more information on the Rent Supplement Scheme in appendix 1).

Rental Accommodation Scheme (RAS)

RAS generally caters for the accommodation needs of people in receipt of rent supplement, normally for more than 18 months and who are assessed as having a long-term housing need. The roll out of this scheme has been very slow. We anxiously await the promised review of this scheme, particularly

in relation to the RAS pilots targeting people who have experienced homelessness. We would also welcome the opportunity to participate in any such evaluation process. (There is more information on RAS in appendix 2).

Supported Living Initiative (SLI): as mentioned Niall Mulligan will discuss this initiative.

For any such schemes to succeed they must be targeted towards the specific needs of people who have experienced homelessness. The necessary social and care supports must be easy to access and must be available for as long as a person needs them in order to return to independent living. In addition, the needs of those with higher support needs who need intensive support over the longer term to live independently must also be addressed.

Supported Housing: For people with high care and support needs, supported living will best suit their needs. Many have long term disabling conditions – they cannot work and they cannot live independently. In many cases this means offering people a home for life. These are often residential homes staffed by care staff and trained volunteers and where access to medical and other services are facilitated. Supported housing is a particularly important solution when working with those with complex needs. There is evidence to suggest that this type of provision is currently under threat or could potentially fall between the two stools of housing on one side and health on the other. Not only must services such as this be maintained; future provision must be planned for and resourced.

Urban and Rural Homelessness

Urban homelessness, particularly rough sleeping, is more visible in our towns and cities. However, this does not mean that people do not become homeless in rural areas. On the contrary, a lack of emergency night shelters and hostels in rural areas means that people who become homeless within these areas tend to travel towards the nearest town or city in the hope of getting the support that they need. There are particular problems in rural areas in relation to isolation where there is often limited access to support services, to information and to public transport. If you are homeless with a drug or alcohol problem in the North East it is almost impossible to get a place on a residential detoxification programme without leaving your community and waiting a considerably long time for a detoxification place to become free.

When people do gravitate towards urban areas, they find that support services are often full, leaving them with little choice but to sleep wherever they can i.e. on the streets or within the doorways of our towns and cities. It also means that extremely vulnerable people have now moved away from their friends and family – critical social networks and support structures that most of us take for granted. This is the time when they need them most.

Whether in urban or rural areas, many of the causes of homelessness remain the same – drug or alcohol issues, mental health issues, poverty and family breakdown. Simon wants to see services and responses in place locally in all parts of the country so people are not forced to leave their community and can remain connected to their support network - their family and their friends. Local issues need local responses. This is, and always has been our approach, and is reinforced in the National Homeless Strategy ‘The Way Home’.

Pressure on the Simon Communities around the Country

We in the local Simon Communities around Ireland see first hand the devastating impact the current economic crisis is having on people who were already marginalised and vulnerable. People turning to Simon often have nowhere else to go; they have run out of options. They are in poor health and isolated, lonely and excluded. Many have experienced great trauma in their lives. Their only option is Simon.

The added tragedy is that in the current climate all the Simon Communities around Ireland are under increasing pressure in terms of funding, with reductions in statutory funding across a range of budget lines and uncertainty in terms of voluntary donations. It is more important now than ever before that Simon services are guaranteed the essential funding to allow them to meet the needs of the most vulnerable people in our society. It is critical that we do not turn the clock back on the progress that has been made in addressing homelessness in recent years.

None of us know what 2010 will bring. However, what we do know is that further cuts in our statutory funding will be devastating for the people we work with.

Current Policy Responses

On a more positive note, we welcome current developments in terms of the Supported Living Initiative mentioned earlier. There has been considerable work done on this scheme in the Dublin context which Sam will address later in his presentation. However, outside of Dublin, we are getting little information as to how this, and other schemes, will be rolled out. In addition, such schemes need to be tailored to meet local needs and local demands. We have had no clarity to date in relation to how and when this will happen.

A related gap that we have identified nationally is that of people living within our emergency accommodation whose needs are high and fall outside the low and medium support parameters of SLI. These people fit within the context of complex needs that Colette Kelleher spoke about and are dependent upon night shelter and emergency accommodation services to keep them alive. This point is not made lightly. They will not survive for long if forced back to living on the streets.

In relation to current legislation, the new Housing (Miscellaneous Provisions) Bill 2008 will put local and regional homeless fora on a statutory footing. This extends to the Homeless Action Plans which such fora will develop. The Simon Communities of Ireland are very supportive of this development and indeed we lobbied for its inclusion in the Bill. It is now critical that this becomes a reality. There are some areas where the local/regional fora meet regularly and function very well but in other areas they are less effective or indeed do not exist at all.

Our experience within Dundalk Simon Community of Local and Regional Homeless fora is varied. In relation to Louth County Homeless Forum, our experience is extremely positive – in fact the

forum has just signed off on the final draft of our new Homeless Action Plan and we are awaiting the opportunity to present this to the Housing Social Policy Committee (SPC) and Louth County Council. In relation to Meath County Council, we are well aware that a forum exists and a current plan is in place which extends out to 2011. We are also aware that a Homeless Forum operates within Cavan/Monaghan. We are not aware of any regional homeless forum in the North East though the idea has been discussed in County Louth.

We believe the Department of the Environment, Heritage and Local Government has issued guidelines this month to each local authority on the establishment of homeless fora. It is essential that all of these fora are up and running before the end of 2009 and working on their Local Homeless Action Plans. If this does not happen, some areas of the country will be operating in limbo and the rural/urban divide discussed here will widen when it comes to service provision for people who are homeless in Ireland.

From the point of view of joined up thinking and collaboration, it is worth noting that the North East Regional Drugs Task Force is now represented on the Louth Homeless Forum and we are hopeful that this will extend out to those in Meath, Cavan and Monaghan. Given the well-established links between homelessness and drug or alcohol issues, this approach should be encouraged nationally.

The Dublin Approach (under the auspices of the Homeless Agency)

The situation in Dublin differs from the rest of the country for two main reasons:

1. The concentration of homelessness in the urban capital.
2. The Homeless Agency: The Homeless Agency was established in Dublin in 2001 in response to the higher levels of homelessness experienced in the city than elsewhere in Ireland at that time. It followed on from the former Homeless Initiative, which was established in 1996. The Homeless Agency works in partnership with voluntary and statutory service providers.

The Homeless Agency Partnership action plan Key to the Door for the Greater Dublin Area compliments the National Homeless Strategy.

Towards the end of 2008, three reports were published by Homeless Agency Partnership specifically for the Greater Dublin Area:

- Counted In 2008.
- Evaluation of Homelessness.
- Review of Finance.

These reports analysed the profile of the homeless population, evaluated the system they were stuck in, and where money (approx 62m Euro annually) was being spent. The reports were followed by a submission from the Partnership to central Government last December 2008 with a broad set of recommendations, the critical thrust of which was the need for adequate provision of housing and appropriate supports in housing.

In this submission the Board of the Homeless Agency Partnership made a commitment to Government that an Implementation Steering Group be established to develop Action Plans with timelines for the initiatives recommended. This Implementation Steering Group was established and

has since been replaced by an Implementation Advisory Group which meet on a weekly basis to drive this process. This process has been, and continues to be, difficult and challenging but we really believe that it will lead us to achieving the 2010 commitments in the Greater Dublin Area.

Habitual Residence Condition

This additional criterion for qualifying for certain social assistance payments was introduced in May 2004. Since its introduction there have been changes in relation to family payments for those from the European Union/European Economic Area (EU/EEA) member states which we welcome. However, this condition continues to have very real implications particularly for those from EU/EEA member states with no work history and non- EU/EEA nationals.

Evidence

EU10 Study: A study undertaken in Dublin (O'Sullivan and the Homeless Agency) in one week in Dec 2006 identified 283 EU10 migrants were using homeless services, of those 170³ agreed to participate in a survey. This survey looked a range of factors including housing status and found high levels of housing instability, homelessness risk and homelessness.

Counted In 2008 - Rough Sleeper⁴ Findings (Survey Method): The Counted In 2008 survey identified 110 people who were sleeping rough in the Dublin area (this is down from 185 in 2005). However, there was a large increase in the number of non-Irish nationals who reported sleeping rough - from one in ten people sleeping rough (9%) in 2005 to two out every five people (37.6%) who reported sleeping rough in 2008.

Nationality statistics from the cold weather shelter run by Dublin Simon (Winter 08/09): Of the 74 male service users 62 (84%) were non-Irish nationals.

Implications

- The HRC is putting people at risk of homelessness and is causing homelessness.
- This is increasing pressure on already stretched homeless services.
- There is inconsistency in the interpretation of the rules and guidelines surrounding the HRC.
- There is no reference to the Habitual Residence Condition and its implications for homeless services in the National Homeless Strategy and Implementation Plan.
- This issue is not being addressed in any meaningful way at a policy level.

(More information on the HRC in appendix 3)

³ Of the survey respondents, the majority were Polish (65%), with significant numbers from Lithuania (10%) and the Czech Republic (9%). Men accounted for 83% of respondents. The majority (55%) were in the 26-39 years age group (Counted In, 2008- A report on the extent of homelessness in Dublin. Homeless Agency 2008).

⁴ The Homeless Agency has agreed a definition of 'rough sleeping' (or 'sleeping rough') as people sleeping, or bedded down, in the open air (such as on the streets, or in doorways, parks or bus shelters); and people in buildings or other places not designed for habitation (such as barns, sheds, car parks, cars, derelict boats or stations).

Conclusion

We would like to once again thank you for inviting us to address you.

We would ask for your support in particular to ensure that:

- The 'poor and vulnerable' whom this Government has repeatedly pledged to protect are indeed protected from further cuts in Budget 2010.
- The National Implementation Plan is updated on an annual basis, tracking activity to date and assigning timelines and departmental/agency responsibility for the delivery of the remaining actions.
- There are effective responses to meet the needs of people who are homeless who also have complex needs.
- The long-term accommodation and support needs of people who are homeless are addressed as a matter of priority. The 2010 commitments cannot be met until accommodation and health and social care needs are addressed.
- Supported housing services for people who are or have been homeless are maintained and that future provision is planned for and resourced.
- Simon services are guaranteed the essential funding to allow them to meet the needs of the most vulnerable people in our society particularly at this critical time.
- There are sufficient cold weather strategies in all areas where they are required.
- When the National Housing Services Support Agency is established that the focus on homelessness will not diminish in any way. This agency will amalgamate a number of agencies of which the Homeless Agency is one.
- The same energy and emphasis currently being given to the Dublin Action Plan (as discussed by Sam McGuinness) is given to the National Strategy/Implementation Plan and areas outside of Dublin.
- The Habitual Residence Condition and its impact in terms of homelessness and increasing the pressure on homeless services is addressed at a policy level.
- Acknowledging the cross cutting nature of the Habitual Residence Condition that the Department of Environment, Heritage and Local Government in conjunction with the Department of Social and Family Affairs and the Department of Justice, Equality and Law Reform and the social partners, conduct an impact assessment of the HRC in relation to increasing homelessness and the risk of same.
- Finally, to put the weight of this Committee behind all of the good work which is being done and to ensure that such efforts are sustained.

We also hope that you will continue to remind the Government of its commitments to end long-term homelessness and the need to sleep rough by 2010 and to monitor the implementation of the National Homelessness Strategy and Implementation Plan. We would appreciate the opportunity to return to you in the future to report on the Simon Communities of Ireland's perspective and experiences of the issues of homeless around the country at this critical time.

Appendices

Appendix 1:

Rent Supplement Scheme

If a person cannot pay the full amount of their rent each month because of unemployment, disability or illness they can apply for help under the Rent Supplement Scheme (RS). Although RS offers a safety net for some at a time of crisis there are a number of difficulties associated with this scheme. It can be difficult to access and landlords are not always willing to accept RS payments. Sometimes the RS amount is not enough to meet the full cost of renting and many landlords also require tenants to pay an additional (illegal) top up to their personal contribution often from their own limited resources. This often results in people doing without basic necessities such as food to avoid the risk of eviction. Changes in the operation of this scheme as part of budget 2009 and the Supplementary Budget 2009 have put increased financial pressure on people and families on low incomes increasing the risk of homelessness.

Recent Rent Supplement Changes
<p>Budget 2009 Changes</p> <ul style="list-style-type: none">- Minimum contribution of households in receipt of Rent Supplement was increased from €13 per week to €18 per week.
<p>Supplementary Budget 2009 Changes</p> <ul style="list-style-type: none">• Entitlement to Rent Supplement was restricted to households who were living in rented accommodation or in accommodation for homeless people for at least 6 months in the previous 12 months or who were on a local authority housing list following a full housing assessment.• The minimum household contribution was further increased from €18 to €24.• The maximum rent limits were reduced by between 6% and 10%, depending on geographical area and household size.• Rent Supplement payments currently being made to tenants were reduced by 8%, in order to encourage landlords of existing Rent Supplement tenants to reduce their rents.

Impact of changes

- These changes put more individuals and families at increased risk of homelessness and will continue to do so. The combined increase in the tenants' contribution from €13 per week to €24 per week represents an increase of 85%⁵.
- We also fear that these changes will pressurise already vulnerable tenants to increase their 'personal contribution further ('topping up') thus diminishing their limited resources and increasing their vulnerability and risk of homelessness.

⁵ Source: MakeRoom Pre Budget Submission 2010

- In addition, a central tenet of the National Homeless Strategy is prevention however recent changes may mean some households become homeless as they do not meet the tighter eligibility criteria i.e. they are not living in private rented accommodation or in accommodation for people who are homeless for 6 months of the previous 12 months or they have not have had a full Housing Needs Assessment (HNA)- there are waiting lists for HNA. Thus some households clearly at risk may fall through this vital safety net for administrative reasons.

The impact of these changes to the weekly income of rent supplement claimants is detailed below

Payment	Single person	Couple	Lone parent family with 1 child	Family with 2 children
Basic payment minus tenants rent contribution (€18) pre budget	€186.30	€321.90	€212.30	€373.90
Basic payment minus tenants rent contribution (€24) post budget	€180.30	€315.90	€206.30	€367.90
Basic payment minus additional 8% where landlord does not reduce weekly rent	€171.82 (where 8% = €8.48)	€301.82 (where 8% = €14.08)	€188.22 (where 8% = €18.08)	€345.82 (where 8% = €22.08)
Combined percentage reduction in basic rate of weekly income	8%	7%	12%	8%

Source: MakeRoom Pre Budget Submission (Oct 2009) www.makeroom.ie

Appendix 2

Rental Accommodation Scheme

Latest figures from the Department of the Environment, Heritage and Local Government indicate that to date, local authorities have transferred almost 12,000 rent supplement cases to the Rental Accommodation Scheme units. This scheme is an alternative to Rent Supplement generally catering for the accommodation needs of people in receipt of rent supplement, normally for more than 18 months and who are assessed as having a long-term housing need. It involves local authorities sourcing accommodation for these households from private and voluntary sector sources. The roll out of this scheme has been very slow. We anxiously await the promised review of this scheme particularly the RAS pilots targeting people who have experienced homelessness. We would also be anxious to participate in any such evaluation process. This scheme aims to give people some security in the longer-term.

Appendix 3

Habitual Residence Condition (HRC)

The Habitual Residence Condition is having a particular impact of the following groups of people:

- Those with limited or inconsistent work history.
- Those who were employed and assumed their employer had filed appropriate documentation on their behalf and once they have become unemployed they discover that this is not in fact the case.
- People who came to Ireland in pursuit of a better life and things may not have worked out.
- Those who met the HRC criteria but the guidelines are being misinterpreted.

Evidence

EU10 Study

A study undertaken in Dublin (O'Sullivan and the Homeless Agency, 2006) in one week in Dec 2006 identified 283 EU10 migrants were using homeless services, of those 170 agreed to participate in a survey. This survey looked a range of factors including housing status and found high levels of housing instability, homelessness risk and homelessness.

Housing Status (n=170)	
20%	Living in private rented accommodation
18%	Living with friends and relatives
14%	Living in tourist accommodation
12%	Living in a squat
11%	Sleeping rough
13%	Staying in homeless accommodation
18%	Reported sleeping rough or living in a squat for longer than 1 month
36%	Reported that they had applied for state assistance but were rejected

NB: This study only focuses on EU10 nationals and is limited to homeless services in Dublin

Implications

- The HRC is putting people at risk of homelessness and is causing homelessness.
- This is increasing pressure on already stretched homeless services.
- There is inconsistency in the interpretation of the rules and guidelines surrounding the HRC.
- There is no reference to the Habitual Residence Condition and its implications for homeless services in the National Homeless Strategy and Implementation Plan.
- This issue is not being addressed in any meaningful way at a policy level.