	Housing Needs Assessment Reform
	Response to the Policy Framework Document from
	the Simon Communities of Ireland
	April 2010

Introduction

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.

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 between 4, 500 and 5,000 people who experience – or are at risk of – homelessness every year.

We welcome the opportunity to contribute to this process from our perspective working with people who are homeless or at risk of homelessness across Ireland. We see this as the start of a process of engagement in relation to the reform of the Housing Needs Assessment and look forward to working together with the Department of the Environment, Heritage and Local Government on this matter into the future.

General Comments

Housing Needs Assessment – The Process

Many people who are homeless are not actually on the housing lists and are unaware of the process of application. It is important that this process is accessible and that it is simplified to ensure all of those with housing need are included. More detail is required in relation to how the HNA will actually be undertaken and by whom, along with a clear delineation of roles and responsibilities. There needs to be greater clarity about the process including the expectations of applicants to keep their application 'live' and under what circumstances their name will be removed from the list. A greater level of transparency is required in relation to the right to reapply if an applicant has withdrawn their name from the list. In addition, there should be a clear and accessible appeals process.

Specialist Training

Specialist training is required for staff who will be liaising with applicants in the process bearing in mind that they are dealing with people who are often vulnerable and the application process requires the gathering of very sensitive personal information.

Guidelines and Best Practice

The document mentions guidelines and best practice throughout. More detail is required in relation to the development of same and who will be involved. In addition, organisations with particular expertise in this

field should be involved, for example organisations working with; people who are homeless, members of the travelling community, and those experiencing domestic violence.

Housing Supports

There is acknowledgement in the document that those who fall within the special needs categories may need some support to live independently. However, there is no discussion of what these support services might be in relation to those who have experienced homelessness and who may have complex/multiple needs. 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"[1]. The section on Housing Support Options should be expanded taking into account the type of supports which are required including but not limited to tenancy services, supported housing, tenancy sustainment, tenancy support and settlement, advice, advocacy and mediation services.

Joined Up Thinking

There needs to be more joined up thinking and a better interface between different policy/strategy areas, departments and agencies, for example, between the Housing Needs Assessment and *The Way Home – A Strategy to Address Adult Homelessness in Ireland 2008-2013.*

Role of Advocates

Some attention should be given to the potential role of advocates in the HNA process both at an individual and an organisational level. This would be important for those who are particularly vulnerable and who may find the process difficult.

Allocations Policy

The paper mentions that regulations will be drawn up in relation to the allocations policy. It is important that there is meaningful consultation with various stakeholders including the voluntary sector on this matter. In addition the regulations should include a specific focus on households who are homeless. There must also be a clear and accessible appeals process. We would welcome the opportunity to contribute to such a process.

Specific Recommendations - The Framework Document

2.1 Eligibility Criteria

(a) Income: We would like to see some flexibility in relation to the stated income threshold bearing in mind that people who have been homeless or who are at risk of homelessness have very limited income capacity.

(c) Availability of alternative accommodation: This category should be expanded to 'availability of alternative and appropriate accommodation' thus ensuring that this alternative accommodation is

---

[1] 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

appropriate to the needs of the particular household. We appreciate that the regulations have still to be specified and welcome the assertion that:

Efforts will be made through regulations and directives and through best practice guidance to ensure a reasonable level of consistency in interpretation in this regard.

These regulations, directives and best practice guidelines should emphasise the appropriateness of the accommodation to the household's needs and the proximity to required facilities and services.

 (d) Rent Arrears – There is no reference in the document to 'Tenancy Support Services' detailing how and when there should be intervention if a tenant is experiencing difficulty, for example, in relation to rent arrears. It is essential that there is an early warning system which facilitates early intervention and resolution before arrears accumulate. This may involve referral to tenancy support services. This process should be explained to all at the beginning of the tenancy (tenant and local authorities).

In cases where there are monies due and owing by a household to a housing authority and the housing authority is satisfied that the household would otherwise suffer undue hardship if social housing support was withheld, there should be flexibility to facilitate housing authorities to provide social housing support and to negotiate a repayment plan with the households for the outstanding monies owed.

3.1 Special Needs Categories
Allocation Policy (previously known as the scheme of letting priorities) we would welcome on opportunity to contribute to the development of these regulations.

Homelessness – The length of time a household has been homeless is an important factor when assessing housing need. The government has pledged to end long term homelessness, defined as the occupation of emergency accommodation for more than six months[2]. Thus, the HNA should gather information on the length of time a household has been homeless and fast track applicants who have been in emergency accommodation for six months or longer. It is essential that accommodation is appropriate to the needs of the household in this context and that relevant support is provided. This would also be useful for data collection purposes and planning to meet future trends.

The description of 'Institutional Care' should be expanded to include all of those in state institutions including psychiatric hospital (not just those which are being closed), general hospitals, prisons, young people leaving state care, those leaving drug/alcohol detoxification and rehabilitations centers. This should encompass those who have no accommodation outside of these ' institutions' but who are capable of either independent living or supported living and are scheduled for return to the community.

Definition of Homelessness
In *The Way Home – A Strategy to Address Adult Homelessness in Ireland 2008-2013* it was stated that the statutory definition of homelessness would not be reviewed but that a review of the definition of homelessness for 'operational purposes' will be carried out. This review will be undertaken by the Cross Departmental Team on Homelessness in consultation with the National Homeless Consultative Committee with reference to the ETHOS typology. The operational definition of homelessness is a critical part of the HNA thus ETHOS typology from appendix two of the Strategy is reproduced below which should inform this process.

---

[2] See Towards 2016, The Way Home – A Strategy to Address Adult Homelessness in Ireland 2008-2013

The European Typology of Homelessness and Housing Exclusion (ETHOS)		
Conceptual Category	**Operational Category**	**Living Situation**
Roofless	1.People living rough 2. People in emergency Accommodation	1.1 Public space or external space 2.1 Night shelter
Houseless	3.People in accommodation for the homeless 4. People in Women's Shelter 5. People in accommodation for immigrants 6. People due to be released from institutions 7. People receiving longerterm support (due to homelessness)	3.1 Homeless hostel 3.2 Temporary accommodation 3.3 Transitional supported accommodation 4.1 Women's shelter accommodation 5.1 Temporary accommodation/ reception centres 5.2 Migrant workers accommodation 6.1 Penal institutions 6.2 Medical institutions 6.3 Children's institutions/homes 7.1 Residential care for older homeless people 7.2 Supported accommodation for formerly homeless people
Insecure	8. People living in insecure Accommodation 9. People living under threat of eviction 10. People living under threat of eviction	8.1 Temporarily with family/friends 8.2 No legal (sub)tenancy 8.3 Illegal occupation of land 9.1 Legal orders enforced (rented) 9.2 Re-possession orders (owned) 10.1 Police recorded incidents
Inadequate	11. People living in temporary/nonconventional structures 12. People living in unfit Housing 13. People living in extreme Overcrowding	11.1 Mobile homes 11.2 Non-conventional building 11.3 Temporary structure 12.1 Occupied dwellings unfit for habitation 13.1 Highest national norm of overcrowding

Domestic Violence - Those fleeing domestic violence in their home should be included as a special needs category.

3.2 Housing Conditions and Household Circumstances
1. Current Housing Conditions

There needs to be flexibility to allow for changing need and circumstance e.g. deterioration in health or for someone with a physical disability whose condition worsens and they can no longer use the stairs etc.

3.3 Choice/Preference
A number of factors should be taken into account in relation to housing choice and preference:

- Getting the balance right between clustering and ghettoisation.
- Provision of single units suitable for the housing of single homeless people.
- Proximity to facilities and services on the basis of household need e.g. an individual with complex needs would need to be housed close to the services and supports they need to access.

- Energy efficiency should also be taken into account especially when dealing with those experiencing poverty and social exclusion.

3.5 Housing Support Options

Housing Support options are crucial for Special Needs categories.

(d) Other housing support options – this section needs to be expanded to include, but not limited to, tenancy services, supported housing, tenancy sustainment, tenancy support and settlement, advice, advocacy and mediation services.

3.6 - Transfers

What is meant by 'good tenant behaviour' need more clarity here as this is very subjective terminology.

4. Future Housing Need

Need to include:

- Those at risk of homelessness.
- Those who are long term homeless (according to the Government's own definition this is 6 months plus).
- Need to expand the category 'persons leaving psychiatric institutions that are being closed' to include:
  all person leaving state institutions including psychiatric hospitals (not just those which are being closed), general hospitals, prisons, young people leaving state care, those leaving drug/alcohol detoxification and rehabilitations centers.

5. Aggregation of Data and Monitoring of Returns

All work in relation to data collection, collation and sharing must conform to best practice guidelines and data protection regulations particularly as they relate to 'sensitive personal information'. Thus, more information in relation to this IT system is required. In addition, where consent is required it is essential that this is 'informed consent' especially when dealing with vulnerable applicants and that refusal of consent will not act as a barrier to inclusion in the Assessment. In addition, how will this link to other data collection systems e.g. the system which is being developed/adapted by the Homeless Agency and the DoEHLG in relation to monitoring homelessness across the country.

Appendix I – Residency Requirements

Habitual Residence Condition (HRC)

The HRC is putting people at risk of homelessness and is causing homelessness. There are households affected by this condition who wish to remain in Ireland but have a clear housing need. This places an obstacle in the path of the government's target of ending the need to sleep rough and long term homelessness in Ireland. The impact of the HRC on homelessness must be acknowledged and addressed at policy level to ensure the housing needs of all those residing in the state are adequately addressed.

Appendix II -Describing Need

Appendix II appears to merely be a check list and gives no indication of how decisions are made. Greater clarity on this process is required.

Special Needs:

4 *Intellectual and Physical Disability:* Intellectual disability and physical disability should appear as separate categories. These are fundamentally different types of disability and result in very different needs in relation to housing. In addition, some individuals have both an intellectual disability and a physical disability and their particular needs must be catered for.

6. *Homelessness:* As previously mentioned, the length of time a household has been homeless is an important factor when assessing housing need. The government has pledged to end long term homelessness, defined as the occupation of emergency accommodation for more than six months. Thus, the HNA should gather information on the length of time homeless and fast track applicants who have been in emergency accommodation for six months or longer. It is essential that accommodation is appropriate to the needs of the household in this context and that relevant support is provided.

9. *Existing Accommodation* : Should include the category 'involuntary sharing' – choice is critical here.

11. *Exceptional Circumstances:* – 11b *Compassionate Grounds:* More detail is required in relation to this category.

15 – *Financial Circumstances:* Need to add a category 'No known source of finance'.

16 – *Income:* Need to add a category 'No known source of income'.

17 – *Ethnic background*: Should conform to best practice and use a unique ethnic identifier.

Special Housing Need:

Complex/Multiple Needs: As already stated, some people, particularly those who are homeless or at risk of homelessness have complex needs (see earlier definition) and require particular accommodation types coupled with appropriate support. Therefore, there should be a special needs category entitled 'complex or multiple needs'.

Other Areas
Other areas which should be included are the requirements for single units/accommodation options and location which is an important factor dependent on need and access to facilities and services. In addition, support needs should be captured here.

Conclusion

As stated, we appreciate the opportunity to contribute to this process; we have a lot to offer in terms of experience and expertise at a local, regional and national level and we are anxious to complement and add value to existing processes. We would welcome further consultation on this matter and in relation to the drafting of regulations regarding the 'allocations policy'.

For Further Information please contact
Niamh Randall, National Research and Policy Manager, Simon Communities of Ireland
Ph: 01 671 1606/087 6188650 or niamh@simoncommunity.com