



**Submission to the
Joint Committee on Housing, Planning and Local Government
on the Re-Categorisation of Emergency Accommodation in Monthly
Homeless Reports**

November 2018

Introduction

The Simon Communities in Ireland welcome the invitation to make this submission to the Joint Committee on Housing, Planning and Local Government on the content of the recent report published by the Department of Housing, Planning and Local Government on the Categorisation of Emergency Accommodation in Monthly Homeless Reports (the report). Our expertise stems from our experience of almost 50 years working with people experiencing homelessness; our involvement in FEANTSA¹ (the European Federation of National Organisations Working with the Homeless); our ongoing liaison with the CSO on appropriate Census homelessness data collection methodologies; and our participation on the National Homeless Consultative Committee (NHCC) and the NHCC Data Sub Committee Chaired by Professor Eoin O’Sullivan of Trinity College Dublin. The report in question raises several issues relating to statistical methodologies and best practice that underpin accurate homelessness data collection across the State. This submission will briefly explore these issues from the perspective of agreed data collection methodologies, the benefits of these methodologies and best practice in evolving data collection methodologies. This will be followed by a brief analysis of the figures reported in the re-categorisation of Emergency Accommodation Monthly Homeless Report figures that took place earlier this year, the nature of the resulting housing arrangements and the lack of a detailed analysis of same.

The NHCC Data Sub Committee Methodology

There was a dearth of official data collection on homelessness and emergency accommodation use across the State prior to 2014 despite repeated requests for same from the Simon Communities and many others. While there was a commitment to end long-term homelessness and rough sleeping by 2010, in the absence of official statistics there was a reliance on best ‘guesstimates’ which were often the source of disagreement and considerable media debate.

Significant progress was made on this issue in 2013 with the convening of the National Homelessness Consultative Committee Data Sub Committee chaired by Professor Eoin O’Sullivan, which included representatives from the Department of Housing, Planning and Local Government, Local Authorities and homeless and housing organisations including the Simon Communities. Following a review of international evidence and analysis of what work had been undertaken in the past in attempting to enumerate homelessness, and a review of the existing data collection systems, the NHCC Data Sub Committee concluded that the most appropriate and accurate approach was to extract data from the national administrative data collected by the Pathway Accommodation and Support System (PASS). It was acknowledged by all that this would not be a *de facto* homelessness count but would instead be a count of those in emergency accommodation funded through Section 10 of the 1988 Housing Act. The count would take place during one week per month, thus providing indicative data only, and that all reports would include this caveat.

The NHCC Data Sub Committee methodology reflects the country-wide practice of Local Authorities carrying out their responsibilities as outlined in the 1988 Act. The figures are published monthly and are compiled for the final full week of the month. The monthly figures provide consistent and comparable longitudinal data of those in emergency accommodation allowing for a greater

¹ FEANTSA is the European Federation of National Organisations Working with the Homeless. <https://www.feantsa.org/en/about-us/what-is-feantsa>.

understanding of the changing homelessness crisis and support the planning and delivery of appropriate services, policy and funding interventions.

The approach taken by the NHCC Data Sub Committee was a collaborative process and reflected practical and contextual realities of homelessness in Ireland. On this basis, recent discussions and practices that suggest a change in the methodology are concerning. Best practice would suggest that at the very minimum, the NHCC Data Sub Committee or a similar body including key stakeholders should have been (re)convened and consulted in advance of any change in data collection methodologies and the subsequent publication of the resulting data. Any changes to the methodology risks creating issues with the ongoing compatibility and comparability of existing and future data sets.

The limitations of this approach were openly acknowledged, as was the fact that services provided through funding from other Government departments were excluded from these figures. Groups excluded include rough sleepers, people experiencing hidden homelessness,² people in domestic violence refuges, people in direct provision, and persons with disabilities in congregated settings. Further, it was acknowledged that other periodical homeless counts and studies are important in forming an accurate picture of homelessness in Ireland in line with international best practice (see Busch-Geertsema, 2010³). These include rough sleeper counts, the Census homeless count, the latter of which has been carried out across two census cycles in 2011 and 2016, and ongoing research.

Re-categorisation of Monthly Homeless Reports

Given the divergence from the agreed NHCC Data Sub Committee methodology outlined above, the adjustment of the Monthly homeless reports in March and April 2018 is cause for concern. According to the report, two scenarios have emerged which have led to the removal of individuals and families from the monthly homeless reports.

The first scenario involved the allocation of local authority owned stock or properties obtained by local authorities to individuals and families assessed as homeless by local authorities, therefore falling within the remit of Section 10 funding. A total of 211 houses and apartments were being used in this manner, providing emergency accommodation to a total of 741 individuals. The nature of these housing arrangements is not clear, and a number of questions arise:

- What is the level of security of tenure for these tenants; do they have a tenancy in place?
- Are these arrangements temporary and transitional in nature?
- What discretion do local authorities have in allocating available housing stock for use as emergency accommodation in an evolving homelessness crisis?
- Does the use of self-contained section 10 funded emergency accommodation units warrant the removal of households from the confines of the agreed NHCC Data Sub Committee definition?

² The term Hidden Homeless refers to households who stay temporarily with others because they have no other choice. This means they do not have a secure place to call home. They are often staying with friends or relatives, as they have no other place to go. These housing situations are often short-term, unsustainable and breakdown leading to homelessness. Hidden homelessness is often characterised by overcrowded accommodation.

³Busch-Geertsema, V (2010) Defining and Measuring Homelessness.
<https://www.feantsaresearch.org/download/ch013303200488323787194.pdf>.

The second scenario involved families being supported to remain in their homes through the provision of additional rent supports, funded from the homelessness budget under Section 10. If this was in effect a homelessness prevention measure, it should be welcomed. The Housing Assistance Payment scheme (HAP) is, however, the usual means of administering additional payments to households and individuals that are struggling to meet rental payments in such scenarios. Greater detail is required to fully understand the re-categorisation of households in this instance:

- Why were these households not provided with the necessary additional rental supports through either the HAP scheme or the Homeless HAP Scheme, which is primarily used to assist households to move out of emergency accommodation?
- Furthermore, the nature of these arrangements is again unclear. Are these households being permanently supported or was this a once off transitional payment? Do these households have a secure tenancy in place?

Conclusions and recommendations

- The height of this housing and homeless crisis is not the time to move away from a regular reporting system. We need consistent monthly data to allow us to compare like with like.
- The 2014 methodology for the enumeration of homelessness across the State should be maintained, including the publication of monthly homeless reports. This data set allows for consistent policy, service and funding planning.
- This data-set should include:
 - Individuals and families included on PASS as residing in emergency accommodation including shelters, hotels, B&B's, hubs or another form of accommodation funded under Section 10.
 - Where local authorities use Section 10 funding to rent properties (in full or partial payments) for individuals and families these individuals and families should be considered homeless and included in the monthly counts⁴.
- This data set has helped concentrate on the important issues of policy and services rather than distracting public debate on numbers and methodology. Monthly homeless data better facilitates the evaluation of the impact of newly introduced legislation and policies aimed at regulating the housing sector and reducing homelessness.
- The report on the categorisation of emergency accommodation in monthly homeless reports lacks the detail required to fully explain the removal of a significant number of households from the monthly emergency accommodation reports. This has resulted in ongoing confusion.

⁴ See Section 10 (1) of the Housing Act 1988

10.—(1) A housing authority may, subject to such regulations as may be made by the Minister under this section—
(a) make arrangements, including financial arrangements, with a body approved of by the Minister for the purposes of [section 5](#) for the provision by that body of accommodation for a homeless person,
(b) provide a homeless person with such assistance, including financial assistance, as the authority consider appropriate, or
(c) rent accommodation, arrange lodgings or contribute to the cost of such accommodation or lodgings for a homeless person.

- Further re-categorisation of monthly homeless reports should be paused until the NHCC Data Sub Committee has been reconvened, the issues at hand have been discussed and a joint approach has been agreed if required.
- While acknowledging the changing nature of homelessness can mean that the processes used in its enumeration may need to be periodically reviewed, any methodological changes must ensure the integrity of the data and, as far as possible, maintain the comparability of the series.
- The open and collaborative approach which led to the creation of the current official homelessness series was an excellent model, which was agreed as broadly accurate by all the key stakeholders and can be produced regularly without undue resource demands.
- We encourage the Department of Housing, Planning and Local Government to reconvene the NHCC Data Sub Committee under an independent Chairperson to consider any issues of concern that have emerged in the current methodology and agree any updating of the series.
- Recording of, and concern about, numbers should not impact the quality of services being delivered in the housing and homeless sectors. Appropriate time and supports should be made available to those in emergency accommodation to enable them to move to suitable and secure tenancies.
- It is important to recognise that monthly homeless numbers are not political, they represent lived experiences and reflecting the numbers accurately will best serve those in need of housing and homeless assistance.
- Finally, there is a risk of spending too much time debating the numbers without looking to the qualitative experiences behind these numbers, including people's pathways into homelessness, their experiences while homeless and their pathways out of homelessness. More resources need to be invested in researching the actual lived experiences of homelessness and housing insecurity to inform policy and practice.

About the Simon Communities

The Simon Communities support over 11,000 men, women and children. We have almost 50 years of experience providing homeless, housing and treatment services to people facing the trauma and stress of homelessness. We are a network of independent Communities based in Cork, Dublin, Dundalk, Galway, the Midlands, the Mid West, the North West and the South East, responding to local needs and supported by a National Office in the areas of policy, research, communications and best practice. We share common values and ethos in tackling homelessness and, informed by our grassroots services, we campaign for more effective policies and legislation regionally, nationally and at European level. Whatever the issue, Simon's door is always open for as long as we are needed. For more information, please log on to www.simon.ie

Services include:

- Homelessness prevention, tenancy sustainment and resettlement.
- Street outreach, emergency accommodation and harm reduction.
- Housing with support and Housing First services.
- Homeless specific health and wellbeing services (counselling; addiction treatment and recovery; and mental health supports).
- Personal development, education, training and employment services.
- Foodbanks, drop-in centres and soup runs.

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