

# Submission to the Dept of Children, Disability, and Equality on the Statement of Strategy 2025-2027

May 16<sup>th</sup>, 2025

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### About us

The Simon Communities of Ireland are a network of independent communities across the country that provide homeless, housing and treatment services to people facing the trauma and stress of homelessness. With a proud history of over 50 years responding to local needs, the Simon Communities of Ireland works to end long-term homelessness in Ireland and ensure that homelessness where it does occur is rare, short-term, and non-recurring.

The Simon Communities of Ireland (SCI) national office is a leading campaigner nationally in putting forward solutions for tackling homelessness. Our work engages with advocacy, policy and communications that is grounded in the experiences of our local services. We campaign for more effective policies and legislation locally, nationally and at a European level. SCI campaign for practical and sustainable solutions that tackle homelessness head on. Our advocacy and solutions are based on evidence, best practice, and the experiences of the people who use our services.

### About this Submission

This submission draws from input from some of the Simon Communities across Ireland, some of our previous work together on <a href="mailto:manifesto">manifesto</a> asks and <a href="mailto:other advocacy">other advocacy</a>. We are member of the Irish Homeless Policy Group (IHPG) and the Irish Coalition to End Youth Homelessness (ICEYH) and therefore, support submissions by our peers in these collaborative working spaces also.

# Accessibility

Please note that under Article 4.3 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD), that public consultations should be accessible and allow submissions in accessible formats.

# List of Acronyms

ICEYH Irish Coalition to End Youth Homelessness

IHPG Irish Homeless Policy Group SCI Simon Communities of Ireland

UNCRPD UN Convention on the Rights of Persons with Disabilities

Summary of Recommendations



- 1. Implement the existing Youth Homelessness Strategy 2023-2025
- 2. Develop a successor Youth Homelessness Strategy from 2026 onwards, in consultation with young persons with lived experience and service providers.
- 3. Ensure children who are experiencing or at risk of experiencing homelessness are adequately supported, and that their interests and rights are at the forefront of decisions made in relation to homelessness services.
- 4. Ensure every child experiencing homelessness has access to a childcare worker, should they require one.
- 5. Create a statutory limit on the time that a family may spend in emergency accommodation, and put into place regulations in relation to the type of emergency accommodation that families may be accommodated in.
- 6. Support disabled persons to live independently and prevent entering homelessness.
- 7. Support exits out of homelessness into appropriate accommodation for disabled persons.
- 8. Prioritise prevention services for young persons at risk of entering homelessness, including aftercare services and family mediation services.
- 9. Enhance data collection and reporting by Local Authorities, to better capture hidden homelessness and the impacts of prevention and support services

### **Recommendations and Comments**

1. Implement the existing Youth Homelessness Strategy 2023-2025



2. Develop a successor Youth Homelessness Strategy from 2026 onwards, in consultation with young persons with lived experience and service providers.

Young people are at a crucial point in their development, transitioning from adolescence to adulthood, and experiences of homelessness at an early age can have very serious lifelong effects on a young person's development and health, as well as access to education, employment and housing security. Ireland has a Youth Homelessness Strategy, published in 2022, with key actions to address this. Since the strategy was launched, youth homelessness has increased significantly, from 1,371 in November 2022 to most recently 1,798 in April 2025. Unless we have changes in policy, start taking preventative measures and collecting the data, it is likely that youth homelessness will continue to increase. The remaining actions must be implemented by the end of the strategy in 2025, and a successor strategy, developed in consultation with young persons with lived experience and service providers, is needed from 2026 onwards.

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Nearly a third (30%) of persons living in emergency accommodation are under the age of 18.<sup>2</sup> A systematic review of homelessness and health-related outcomes in Ireland found that homelessness has significant negative impacts on children's mental and physical health, as well as their social development and access to GP services.<sup>3</sup> Dr. Aoibhinn Walsh, consultant paediatrician at Children's Health Ireland, has also highlighted that children experiencing homelessness are often well below the height and weight of their peers as a direct result of homelessness and not having access to a nutritional diet or a space to play. This faltering growth among children experiencing homelessness has led to cases of anaemia, vitamin D deficiency and rickets.<sup>4</sup> In a 2019 report by the Ombudsman for Children's Office, 'No Place Like Home', both parents and children expressed their appreciation of the

<sup>&</sup>lt;sup>1</sup> Statistics Hub - Simon Communities in Ireland

<sup>&</sup>lt;sup>2</sup> Statistics Hub - Simon Communities in Ireland

<sup>&</sup>lt;sup>3</sup> Homelessness and health-related outcomes in the Republic of Ireland: a systematic review, metaanalysis and evidence map | Journal of Public Health

<sup>&</sup>lt;sup>4</sup> s://www.irishtimes.com/ireland/social-affairs/2024/07/06/rickets-anaemia-scabies-homeless-children-in-ireland-suffering-malnutrition-effects-more-associated-with-developing-countries/



staff they worked with, particularly Child Support Workers.<sup>5</sup> Child Support Workers mitigate the trauma of homelessness, and therefore it is imperative that every child experiencing homelessness has timely access to this support.

There are also far too many people spending lengthy periods in emergency accommodation – as of December 31st, 2024, 906 families were living in emergency accommodation for a year or longer – 417 of which were there two years or longer. The next Strategy should prioritise supporting children experiencing or at risk of experiencing homelessness, while ensuring that the amount of time children spend in emergency accommodation is minimal. In England, for example, Part 7 of the Housing Act 1996 places an obligation on local housing authorities to ensure that accommodation provided to homeless persons is suitable. Secondary legislation provides that "B&B accommodation is not to be regarded as suitable for an applicant with family commitments' where the applicant has already occupied B&B accommodation for a period of six weeks."

- 6. Support disabled persons to live independently, preventing persons from entering homelessness.
- 7. Support exits out of homelessness into appropriate accommodation for disabled persons.

Disabled persons are at increased risk of experiencing homelessness compared to their non-disabled counterparts,<sup>8</sup> and are disproportionately represented among homeless populations. The National Disability Authority reports that 29% of persons living in shelters or refuges were experiencing a "psychological or emotional condition or a mental health issue" – nearly six times the rate of the general population. Additionally, 15% of those in refuges or shelters experienced difficulties with pain, breaking or other chronic illnesses or conditions.<sup>9</sup> Supporting disabled persons to live independently, including through access to employment, education, healthcare, and other supports, is critical to homelessness prevention amongst this cohort. The Dept of Children, Disability, and Equality should also work collaboratively with local authorities and the Dept of Housing, Local Government, and Heritage to support exits out of homelessness.

8. Prioritise prevention services for young persons at risk of entering homelessness, including aftercare services and family mediation services.

Both Irish and international research evidence points to the particularly high-risk of homelessness among those who have been in State care as children. Those

<sup>&</sup>lt;sup>5</sup> Ombudsman for Children's Office (2019) *No Place Like Home*.

<sup>&</sup>lt;sup>6</sup> gov.ie - Homeless Quarterly Progress Report for Q4 2024

<sup>&</sup>lt;sup>7</sup> See Articles 3-4 of the Homelessness (Suitability of Accommodation) (England) Order 2003 (SI No. 3326 of 2003).

<sup>&</sup>lt;sup>8</sup> Addressing the health inequalities for people experiencing homelessness and disability | Homeless Link <sup>99</sup> NDA Factsheet: Housing - National Disability Authority



transitioning out of care often must leave home much earlier than peers living with their families and therefore have to rapidly become self-sufficient once they turn 18. This is especially relevant given that young adults are staying at the family home until much later in life due to the high cost of housing. Several studies conducted in the US point to a 20-30% rate of homelessness in the years following those leaving State care. EPIC's 2022 advocacy report highlighted the prevalence of housing and homelessness issues among care leavers in Ireland, with a total of 18% (12% accommodation and 6% homelessness) of advocacy cases falling into this category. Of EPIC's caseload were classified as homeless. The next strategy should commit to enhancing and improving aftercare services to prevent care leavers from entering homelessness.

A recent evaluation of Focus Ireland's Young Family Mediation Service highlighted the positive impact of the services for young persons and their families. Youth Family Mediation aims to provide a structured environment to address conflict within families, allowing young persons to stay in the family home and prevent them from entering homelessness. Both young persons and their families who were supported by the service reflected positively, citing the mediators as a key reason they were still living at home. The report estimates that on the cost per mediation case, which typically concludes within 12 months, is €5,869.56. The average cost of providing residential care to a child is €6,193 *per week*. Each young person that a mediator prevents from entering residential care could therefore save the state €317,052 annually. Young Family Mediation Services is a cost effective intervention to prevent children and young persons from entering care services or homelessness, and should be prioritised.

9. Enhance data collection and reporting by Local Authorities, to better capture hidden homelessness and the impacts of prevention and support services

17% of adults experiencing homelessness in Ireland today are between the ages of 18-24. Addressing demographic needs are core to addressing housing needs. Given that the population, including 18–24-year-olds is expected to grow significantly to 2051, the problem of youth homelessness can also be expected to continue to grow. Policy must adapt to this reality by encompassing preventative measures and be informed by the collection of related data.

Local authorities are well-placed to provide valuable data. SCI urge that, as part of the Strategy, Local Authorities provide quarterly, publicly available reports on

<sup>&</sup>lt;sup>10</sup> Curry and Adams (2015). Housing and Social Support for Youth Aging Out of Foster Care: State of Research Literature and Directions for Future Inquiry. <u>Available here</u>.

<sup>&</sup>lt;sup>11</sup> Preventing Homelessness among Care Leavers: Review of the Capital Assistance Scheme (CAS) for Care Leavers. <u>Available here</u>.

<sup>12</sup> Statistics Hub - Simon Communities in Ireland



the number of young persons aged 18-24 presenting for support due to homelessness, and, of these:

- The number that are subsequently assessed and regarded as experiencing homelessness under s.2 of the Housing Act 1988,
- The number that are regarded as experiencing homelessness that are subsequently allocated emergency accommodation,
- The number that are regarded as experiencing homelessness but that are not allocated emergency accommodation, and the reasons given,
- The number that are not regarded as experiencing homelessness under s. 2 of the Housing Act 1988, and the reasons for this determination,
- The number of those that are not regarded as experiencing homelessness that are signposted to appropriate support or prevention services.

This data will provide valuable information, capture impacts of support or prevention services, and inform further evidence-based policies and interventions.

For more information, please contact Julia Corey, Policy Analyst at: <u>julia.corey@simoncommunity.com</u> or 086 191 6342

"The Scheme to Support National Organisations is funded by the Government of Ireland through the Department of Rural and Community Development"





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Registered Office: Coleraine House, Coleraine Street, Dublin 7. Registered Charity Number (RCN): 20020125.

Registration Number: 74038. Charity Number: 8273.