



Irish Council for Social Housing

Response from Irish Council for Social Housing

June 2011

1.1. Legislation

-Is there any legislation or policy in your country which focuses specifically on homeless services provision?

Yes, there is primary legislation, regulations, guidelines and policy statements that focus on the provision of homeless services in Ireland.

Legislation- Health Act 1953 and the Childcare Act 1991, Housing Act 1988, Housing (Miscellaneous Provisions) Act 2009.

The Housing Act 1988 provides a legal definition of homelessness in Ireland, and enables local authorities to provide funding to voluntary bodies for the provision of emergency accommodation and long term housing for people who are homeless. Under the 1988 Act local authorities must carry out an assessment of people who are homeless and in need of housing in their administrative area. Agreed Operational Criteria for the Common Assessment of Homelessness have also been developed in addition to the statutory definition.

The Housing Act 2009 provides Local Authorities with a statutory framework for the establishment of Homeless Fora, Homelessness Action Plans and also provides for Regional Homelessness Action Plans where appropriate. The Homeless Action Plans should take account of any available information relating to the extent of the need for services to address homelessness, including any summary of social housing assessments prepared in respect of homeless households, the costs of the proposed measures and the financial resources that are available or are likely to be for the period of the homeless action plan. It must also include effective measures to co-ordinate activities undertaken by the bodies providing services to the homeless in order to address

homelessness in the administrative area concerned. Homeless Actions Plans will be made public as they will be published on the internet for the duration of the plan.

Policy-The Way Home -2008-2013, this is the current strategy in place in Ireland to address Homelessness. One of the aims of the strategy is to end long term homelessness and to ensure those who are homeless will be placed in long term supported accommodation. There has been a National Homeless Strategy in place since 2000. There are also many other policy statements regarding homelessness. The [Youth Homeless Strategy](#) was published by the Government in October 2001. This strategy sets out various objectives and steps to reduce/eliminate youth homelessness in Ireland. The Health Service Executive (HSE) has primary responsibility for implementing the strategy, and two-year strategic plans on how they will achieve this were submitted to the Department of Health and Children. These plans were approved in 2002 and are currently being implemented. The implementation of the Strategy is being monitored and co-ordinated by the Youth Homelessness Strategy Monitoring Committee, chaired by the Office of the Minister for Children and Youth Affairs.

In the reconfiguration of services in Dublin under the homeless strategy there is an evaluation and reconfiguration of services in order to move away from emergency and transitional accommodation toward long term accommodation with supports if necessary
“Pathway to Home”: Mapping of Reconfigured Homeless and Housing Support Services” is the implementation plan which under pins the strategy and how it will operate on a ground level.

1.2 Typology and organization of services

-Does a typology of homeless or social services exist in your country? In your organisation? If yes, please describe in detail.

Homeless services in Ireland could generally have been divided into the categories of emergency services (i.e. hostel type accommodation for over night stays, B&B's), transitional accommodation (accommodation used for a period of time to prepare clients for a move into permanent accommodation) and long term supported accommodation. The provision of services to the homeless in Ireland is undergoing a transitional period where the main aim is to provide homeless people with permanent accommodation.

The majority of services for the homeless are located in Dublin. A reconfiguration of homeless services is currently underway and a typology for this has been developed by the Homeless Agency.

- A: Prevention Services
- B: Temporary Emergency Accommodation and Services
- C: Housing and Housing Support Services

See page 10 – following document: <http://www.homelessagency.ie/Research-and-Policy/Publications/Pathway-to-Home-model/Configuration-of-Homeless-Services-2010.aspx>

Social Services available in Ireland for those who are homeless include:

- Addiction Services
- Advice Service
- Alcohol Advice and Treatment Centres
- Counselling
- Day Centres
- Education, Training and Employment
- Health Care
- Homeless Advice
- Housing Advice
- Information provision

-Does a register of homeless services exist? If yes, please give us relevant links to websites and directories.

Register of homeless services has been developed in Dublin where the majority of homeless services are located: www.casemanagementguidebook.ie
<http://www.homelessagency.ie/About-Homelessness/If-you-are-Homeless.aspx>

The ICSH provides a national register of homeless accommodation services nationwide.
http://www.icsh.ie/eng/list_of_members/dublin/homeless

There are some services listed in the following:

<http://www.socialwork.ie/socialwork/web-directory/homeless/homeless-services>

-Describe briefly how the provision of homeless services is organised in your country.

Homeless services are provided by a mix of statutory agencies and voluntary charitable organizations. Local authorities, to varying degrees, provide accommodation, the HSE provides health and social services and voluntary organizations provide hostel, supported and long term housing, day services and other services such as addiction counseling, outreach etc. Services are funded through a combination of exchequer funding and donations raised through fundraising.

The provision has developed piecemeal over time resulting in a variety of service types depending on provider and location. This disjointed approach has led to a lack of co-ordination of supply of services and varying results in meeting clients' needs. Currently there is a homeless strategy overseeing the development of homeless services to put in place a framework for the development of services and address either gaps in service or duplication.

Currently services for the homeless in Dublin are being reconfigured as part of the implementation of the homeless strategy Pathways to Home. The reconfigured homeless services have 3 interdependent elements

- Interventions and services that prevent homelessness
- Local Authority Homeless Helpline and Local Authority Housing Service
- Community Welfare Service

Homeless prevention services (in addition to the Local Authority prevention services) will focus on the following areas

- Prevent homelessness through quality information and advice.
- Divert people who are at immediate risk of homelessness away from emergency accommodation through information, advice and referral.
- Reduce the length of time people spend in temporary accommodation through information on housing options and assistance with securing tenancies.

Voluntary organizations will deliver preventative and tenancy sustainment services to assist social housing tenants at risk of losing their tenancy in the Dublin Local Authority areas.

Temporary accommodation and homeless services

- Temporary Accommodation (those with low support no support needs) and Supported Temporary Accommodation (ie. those with mental health issues, those fleeing domestic violence, those suffering from addictions)
- Designated units will be set aside on an annual basis for those experiencing homelessness

Housing and Housing Support Services

- Permanent on-site Housing Support function/service
- Semi-permanent on-site Housing Support function/service
- Visiting Housing Support function/ service (specialist crisis intervention)
- Visiting Housing Support function (generic)

1.3. Funding

-What are the main mechanisms in place for funding homeless services provided for the not-for profit organisations in your country (public procurement, grants, agreements with NGOs, donations etc)?

Traditionally capital funding for accommodation was provided by the Department of Environment, Community and Local Government, administered through Local Authorities and available to approved housing bodies (AHB's) under the Capital Assistance Scheme. An element of this will remain in place however there is a new move towards a revenue based mixed-funding model involving private finance raised by AHB's.

Running costs are provided by the DECLG and the Department of Health and allocated to voluntary organizations through local authorities and the HSE. The remainder of funding is sourced through fundraising efforts of the organizations themselves.

All capital projects are procured in line with public procurement rules. Most of the revenue funding is agreed with funding organizations under Service Level Agreements. Revenue funding is usually agreed between the funder and the relevant organization. There has also recently been a case of a competitive tender process for the provision of a homeless service and this may be more of a feature in the future.

Revenue funding for homeless provision in the Irish government's 2011 budget was €53.4m, a reduction of 5%.from 2010. The Homeless Agency allocates funding to homeless services in

Dublin, the funding comes from the Department of Health and the Department of the Environment, Community and Local Government. An evaluation of homeless services is currently under way.

All homeless charities in Ireland rely on donations and fundraising efforts to support their services.

2.1. Quality provisions

-Is there any legislation or policy framework in place defining quality standards or principles in homeless services in your country? (if yes, give a brief description of it and provide us with links to relevant laws or materials)

Currently there is no legislative basis for quality standards in homeless services in Ireland, however a frame work is being developed as part of the Homeless Strategy National Implementation Plan. *“A national quality standards framework will be developed to ensure consistency around the country and improvements will be made to the knowledge and understanding of homelessness, particularly through the application of a national data system”* .

There are many aspects to the current focus on developing quality standards in homeless services and much work is being carried out in applying the care and case management approach, standardizing legal tenancy agreements etc.

Initial details of the proposed framework are available here:

<http://www.environ.ie/en/Publications/DevelopmentandHousing/Housing/FileDownload,20035.en.pdf>.

A current evaluation of homeless services by the Homeless Agency means that buildings which are not fit for purpose and do not meet quality standards are being decommissioned, this will continue throughout 2011.

The Homeless Agency have already produced significant work on standards for homeless services, under the implementation of the homeless strategy, the agency will develop *“national*

quality standards and good practice guidelines". These standards will be developed on the basis of the outcome of the evaluation of homeless services which is currently ongoing."

These standards will be monitored on an annual basis. The standards will be a further development and expansion of work already done by the Homeless Agency on standards for homeless services providers entitled "*Putting People First*".

-If yes, are these quality standards or quality principles?

Both quality standards and guidelines

-Is it compulsory or voluntary?

Currently voluntary – (*Putting People First*) however moving towards a standardized national framework.

-Is there a quality framework for social services in general relevant to the homeless sector?

In order to discharge its statutory duties to promote, encourage and foster high standards in the delivery of mental health services, the Commission has developed, following consultation with stakeholders, a quality framework for implementation within mental health services in Ireland.

The quality framework incorporates the Mental Health Act 2001 (Approved Centres) Regulations 2006, prescribed by the Minister for Health and Children, which came into effect on 1st November 2006. The regulations set out minimum standards for approved centres, necessary in order to provide quality and safety in the provision of inpatient mental health services. The Minister has provided for the enforcement of these regulations by the Commission [Mental Health Act 2001 (Approved Centre) Regulations 2006, Reg. 35]. The quality framework is, however, much broader and more ambitious than the regulations, as it aims to deliver high standards and good practices across all mental health services.

HIQA-The Health Information and Quality Authority, has developed standards and is responsible for inspecting and monitoring the standards in residential care for the elderly, children and people with disabilities. Though this is not aimed specifically at homeless people it may encapsulate a number of homeless people who are assessed as having specific needs.

Part 14 of the Health Act 2007 provides legal safeguards for people who want to report serious concerns they have about standards of safety or quality in Irish health and social care services, including mental health services. It aims to encourage individuals to voice concerns regarding the safety and welfare of patients and to help promote a culture of accountability throughout the health services.

Housing (Standards for Rented Houses) Regulations 2008 requires that rental accommodation reaches certain minimum standards relating to structural condition, provision of sanitary facilities, food preparation, storage and laundry, availability of adequate heating, lighting and ventilation, safety of electricity and gas installation, fire safety and refuse facilities.

Garda Vetting- Garda vetting is conducted for organisations who are registered with the Garda Vetting Unit. It is to ensure that organizations who have employees or volunteers with substantial or unsupervised access to children or vulnerable adults can be vetted. When a prospective employee or volunteer is vetted by the Gardaí the details of all convictions and prosecutions are disclosed to the authorised liaison person in the registered organisation. The ICSH is a signatory organisation for its members, meaning that its members can obtain garda vetting through the ICSH who in turn liaise with the Garda vetting unit regarding each application. It is thought that legislation will be introduced to place garda vetting and the protection of vulnerable groups on a statutory basis.

The ICSH HAPM is a performance management tool for monitoring housing management standards by housing associations. HAPM is currently being further developed to provide benchmarks and performance ratings on housing standards of housing associations. This is currently a voluntary framework.

Are you in your work affected by quality provisions regarding healthcare services or employment services?

No

2.2 Dimensions of quality

- What definition of quality is used in your country? –

As of yet, there is no official definition of quality for homeless services in Ireland. The quality framework is currently under development. The Putting People First guidelines are the existing guidance on standards.

- What are the criteria of quality in a homeless service in your country? (i.e. user's participation, training, funding) –

Under Putting People First there are guidelines on standards for the following:

- ▶ Hostels and temporary accommodation
- ▶ Street outreach
- ▶ Advice and information
- ▶ Food centres
- ▶ Settlements
- ▶ Organizational standards
- ▶ Data protection
- ▶ Transitional housing
- ▶ Day programmes

For full details see:

<http://www.homelessagency.ie/Research-and-Policy/Putting-People-First.aspx>

Example: QUALITY STANDARDS for Organisational Standards

All organisations working with homeless people should aim to achieve the following best practice standards:

PLANNING AND REVIEW

1. Planning
2. Evaluation
3. Research
4. Contributing to public policy

HUMAN RESOURCES

1. Staff recruitment
2. Staff training
3. Managing staff

4. Managing and developing volunteers

HEALTH AND SAFETY

1. Health and safety at work
2. Fire safety
3. Food hygiene

GENERAL

1. Participation and consultation
2. Co-ordination with other agencies
3. Record keeping
4. Funding

The ICSH has also developed general guidelines relating to good governance for housing providers within the Voluntary Housing Sector, this also encompasses homeless service providers.

http://www.icsh.ie/eng/services/publications/icsh_publications/working_for_good_governance

-At what level are the quality standards being developed in your country? (national, regional, local, at the level of your own organisation or a federation of organisations)?

The framework of standard currently being developed will be on a national basis. The standards presently operating are on an organizational level. There are guidelines in place from the homeless agency which are relevant on a national level however currently there are no official consequences for non compliance. However as stated a standardised frame work is in development via the homeless agency in conjunction with the Department of the Environment Community and Local Government.

2.3. Conditionality of funding

-Do funding bodies require minimum standards in homeless services, with strict reporting on meeting these standards? If yes, do funding bodies provide adequate funding to meet these standards?

It is anticipated that as part of the framework of standards for homeless service provision, meeting the minimum standards will be conditional as part of receiving funding for services.

Objective: This section seeks to highlight some specificities of homeless services which should be taken into account when discussing and developing quality standards and measurement tools.

3.1. Transitional character of homeless services

- In your country, is there a different way of measuring quality in homeless services because of their short-term and emergency nature?

Not currently, however an evaluation of homeless services is currently being conducted by the Homeless agency, where buildings which are deemed not up to standard will be decommissioned and services will be realigned with the housing pathway approach.

In relation to the rental housing regulations that apply there are some difference owing to the communal nature of certain aspects of hostel buildings.

-Consultation of service users is an element of quality of the service – do emergency/transitional services in your country have specific methods for this?

Each homeless service provider has their own internal methods for service user consultation and would have established practices within their organizations on consulting with service users in relation to the standard of provision. In some organizations there are dedicated staff who consult and engage with service –users.

Currently an assessment and placement service, the first point of call for homeless people is in operation in Dublin. This service engages with clients to ensure their needs are assessed and they are placed in suitable accommodation, the clients will also be monitored to ensure that changes in their needs or circumstances are adequately responded to. The PASS system (Pathway Accommodation Support System) is the shared client management system which allows statutory and voluntary organizations to share necessary information regarding clients.

The Homeless Agency also envisages a number of consultation periods relating to the national frame work of standards for homeless services providers, which they are currently developing in conjunction with the Department of the Environment, Community and Local Government.

3.2. Diversity

-People who are homeless have multiple needs so services need to have room for creativity and flexibility in finding solutions – do the quality provisions in your work address this diversity?

The Homeless strategy promotes a client centered approach to the reconfiguration of homeless services and a focus on the individual needs of the client. As stated when a client initially enters the system of homeless service provision, an Assessment and Placement Service ensures that clients are placed in suitable temporary accommodation. The clients are then monitored to ensure that if there is a change in their circumstances they can be moved to more appropriate accommodation. This is done via PASS- Pathway Support and Accommodation Support System, which is a shared client support and accommodation management system. This system is currently operational in Dublin.

3.3. Users' Participation

- Has your organisation developed specific methods to ensure effective participation of the users in spite of the unfavourable context of the often emergency character of the homeless services?

Across the homeless sector each organization has developed methods of engagement and consultation with service users.

4. Implementation of quality provisions in homeless services

4.1. Governance

-Who is responsible for implementing minimum standards in homeless services in your country? (homeless services' providers, funding bodies of the homeless services, local authorities etc.)

The homeless service provider is responsible for implementing standards. This is often agreed with the Local Authority in the Service Level Agreement which is the contract between the parties whereby funding is provided for a specific service.

Local authorities are charged with regulation of the standards in the rental housing regulations.

It is stated under the National Homeless Strategy Implementation Plan that the homeless agency will have a significant part in monitoring the minimum standards for homeless services which are in development.

-Is the correct implementation of the quality provisions monitored? If yes, who is in charge of monitoring?

The Homeless Agency will play a significant part in monitoring standards of service provision. The Homeless Agency anticipates an internal and external system of monitoring where internally the failure to meet standards can be flagged and as well as through the external independent monitoring of standards. It is anticipated that the system, PASS- Pathway Support and Accommodation Support System, which is a shared client support and accommodation management system, will play a significant part in helping to monitor standards.

Through which channels is it performed (i.e. activity reports, outcomes measurement, quality certification system etc.)?

Information not yet available, national standards framework in development.

Quality standards in social services from the perspective of services working with homeless people FEANTSA questionnaire

4.2. Methods

-Do homeless service providers in your country create and implement their own quality provisions without involving any external bodies?

Yes it is common for providers to implement their own standards while also looking externally to organizations such as the ICSH or the homeless agency for guidance. Homeless service providers would have agreed standards for delivery of services which would be agreed with funders as well as their own organizations standards relating to services; user participation; health and safety; physical standards; principles of openness and transparency; reporting; monitoring; evaluation; corporate governance; funding.

-Are quality standards regularly reviewed in your country to adapt to changes in service provision?

Currently the standards for the provision of homeless services are being developed to reflect changes in service provision through the implementation of the homeless strategy.

As part of the current on going reconfiguration of homeless services a national framework of standards is in development this is part of the homeless strategy and is set to align the implementation of the strategy with the consistent provision of quality services to homeless clients.

4.3. Staff training

-Are there budgets available to regularly train homeless service staff to adapt to emerging trends and needs?

Ongoing training for staff members may be taken in account in the internal budgets of organizations providing homeless services and would generally be negotiated with funders.

There is currently part funding (50%) on offer for a Certificate in Homeless Prevention and Intervention, with Dublin City University.

5. Evaluation of the existing quality provisions

Objective: this section seeks to identify how the homeless services' providers assess the quality provision and their implementation and how they define the needs in the area against the background of the factual analysis above

5.1. Organisation of homeless services

-In your opinion, is the legislation regarding the organisation of homeless services in your country appropriate?

No the vast majority of homeless services are provided within the Voluntary Housing Sector, the Voluntary Housing Sector is recognised in Irish legislation in a "piece meal" manner, meaning that the sector is covered in aspects of legislation but does not have legislation which is specifically aimed at the sector.

-If not, would you recommend new or amended legislation on homeless services? Please describe how.

The Housing Act 2009 addresses aspects of service provision for the homeless, it would be beneficial in the current economic climate to have legislation amended to ensure ring fenced funding for the implementation of the homeless strategy and future strategies relating to the homeless services on a national basis.

The current framework of standards which is in development will operate as regulation and it is unlikely that the standards will be placed on a statutory basis

5.2. Quality provisions

-Do you consider the existing quality provisions to be adequate t with the reality of homeless services in your country?

It is part of the current homeless strategy that a more clearly developed set of standards is required. The Homeless Agency has been active in developing quality standards for the provision of homeless services, these standards will now be built upon in order to develop a more robust framework of standards for homeless services. Meeting these standards will be mandatory and a condition of accessing funding.

-If not, would you recommend new or amended legislation on quality in homeless services? Please describe how the legislation could be amended and what should the standards or the principles be.

The standards which are in development are being drafted as regulation and it is unlikely that they will be placed on a statutory basis.

-Do you consider the capacity of your organisation to comply with the quality requirements sufficient? If not, what are the needs to be met? N/A

5.3. Specificities of the homeless services

--Is standardisation of quality in homeless services a positive phenomenon, or do you think that (over-)standardisation can detrimentally affect small homeless services providers?

Standardisation of homeless services is a positive phenomenon however it is necessary to take into account the nature of homeless service provision in the case of smaller providers. The Voluntary Housing Sector has in Ireland retained its ethos of volunteerism, with many smaller housing providers in Ireland relying on volunteers and board members in the day to day running of schemes. As such in the development of standards the manner in which smaller service providers operated and their remit should be taken into consideration.

-In your opinion, should there be a two-tier standards system (minimum/maximum) for homeless services to preserve flexibility when necessary (i.e. providing low-threshold services in extreme weather conditions)?

Due to the complexity , changing needs and challenges within the provision of homeless services it is important that a level of flexibility ,which is not detrimental to over all standards, is maintained. As in all frameworks the concept of appropriate levels is helpful.

-One of the criteria of quality in the provision of the homeless services is ensuring effective participation of the service users. Do you find ensuring effective participation of the users in the homeless services challenging? Is this a criterion difficult to meet in your opinion?

Effective participation of service users would be beneficial as a means of ensuring the quality provision of services however due to the complex needs and chaotic back grounds of many homeless service users this could prove challenging for service providers and could prove to be a difficult criteria to meet on a consistent basis. The participation of former homeless people who have emerged from the system are who now successfully live in long term accommodation could perhaps be a more realistic aim.

5.4. Implementation of quality

-Do you think that the quality standards are correctly implemented in the homeless services in your country?

Quality standards are implemented and adhered to by individual service providers in Ireland. It is important the a national frame work of standards is developed and implemented in Ireland to ensure a consistent approach to the provision of homeless services while taking into account the nature of service provision for the homeless in Ireland. This frame work is currently in development.

-In your opinion, what are key principles to consider when implementing quality in homeless services? (transparency, support, user participation, continuous review, understanding of the homeless sector, bottom-up approach, etc.)

- Transparency
- Understanding of homeless sector
- Assessment of clients needs
- Regular review and update of service provision
- Client centred approach
- Staff training and management of volunteers
- Health and safety
- Positive and encouraging work environment for staff
- Good governance
- Outcomes focused
- Enforcement

The role of the European Union

Objective: This section seeks to identify the perceptions of how the EU legislation is affecting the provision of homeless services. In the second place, it looks at what the role of the European Union should be in defining the common quality criteria.

6.1. Impact of EU legislation

-Have you encountered situations where EU rules have had a direct positive or negative impact on the functioning of services in your country?

N/A

-Are you aware of EU legislation on public procurement and state aid?

Yes

-When another EU national uses a homeless service in your country, do you encounter problems with regarding to his/her entitlement to receive services?

Yes , homeless service providers have reported encountering many problems around clients who do not qualify for habitual residency in Ireland. If you do not qualify for habitual residency in Ireland you will not obtain social assistance payments. This means you will not qualify for rent supplement. This in turns blocks the ability of the applicant to enter into permanent or long term accommodation and as a result they end up being stuck in a system of emergency services. This is at odds with the current homeless strategy in Ireland which aims to move homeless clients towards permanent accommodation with necessary supports.

The conditions for habitual residency in Ireland are as follows:

- length and continuity of residence in Ireland or other parts of the Common Travel Area
- Length and purpose of any absence from Ireland or the Common Travel Area
- Nature and pattern of employment
- Your main centre of interest
- Your future intentions to live in Ireland as it appears from the evidence

Criticisms have emerged regarding the consistency through which these conditions are applied to applications and the manner in which applications are assessed for habitual residency.

6.2. Quality framework

-Do you think it would be useful to have a European framework of quality in homeless (emergency) services?

Yes this would be a useful measure to help service providers underpin the current regulation within individual countries regarding homeless emergency services.

-Do you see a role for FEANTSA in supporting the development of quality in homeless services? (for instance by developing a set of quality principles in homeless services)

Yes, FEANTSA could provide a comparison and contrast between the level and type of quality standards within homeless service providers across Europe, a set of quality principles in homeless services could provide a common ground for standards in the provision of homeless services in Europe while still taking into account the individual characteristics and idiosyncrasies of services within each country,

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