

Submission to the Joint Committee on Housing, Planning and Local Government regarding the categorisation of emergency accommodation

Introduction

Merchants Quay Ireland (MQI) is a national organisation that helps people who are homeless and those caught in addiction. We provide frontline services, practical supports, pathways towards recovery and innovative responses to the issues of drug use and homelessness in Ireland.

We welcome the opportunity to respond to the Department of Housing, Planning and Local Government report on the Categorisation of Emergency Accommodation in Monthly Homeless Reports.

Background

In April 2018, it was announced by Minister for Housing, Planning and Local Government that a categorisation error had occurred in the March 2018 homeless statistics. Despite this, no detailed explanation was given to accompany the Minister's statement. A report has since been issued by the Department of Housing, Planning and Local Government this error.

This report detailed that:

- Some local authorities "had been categorising individuals and families who had been provided with accommodation in local authority owned stock or in properties secured by the local authorities under other arrangements, as being in emergency accommodation."
- Families who were at risk of homelessness and had been supported to stay in their own homeless by accessing rental supports (funded from the homeless budget) were also included in the monthly homeless statistics.
- The Department of Housing, Planning and Local Government sought an account of each local authority's position for the March report.
- The information given to the Department by the local authorities showed that the majority of people were classified as being in hotels, hubs, hostels and other forms of emergency accommodation. The information also showed that 741 people in housing and apartments were also included homeless statistics.
- There are inconsistencies in the methodology of reporting, and the Department is being advised by the Central Statistics Office to improve this process.

This report was published in September and accompanied the publication of August 2018 homeless statistics, which showed that 1,606 people had been erroneously categorised as being homeless and removed from homeless statistics for March, April and August 2018.¹

The re-categorisation of people who are homeless calls into question the accuracy of the data being presented to the public and organisations working to address the homeless crisis. What is particularly concerning is that the re-categorisation is not limited to a reporting error, but rather due to the Department's restrictive definition of "homelessness". Merchants Quay Ireland have stated on a number of occasions that without reliable and credible data, the organisation's capacity to address the housing and homeless crisis is greatly diminished.

Re-categorisation

The categorisation report by the Department of Housing notes that people who are being housed by Section 10 funding or staying in leased accommodation should not be considered as homeless. Minister Eoghan Murphy confirms this position when he stated in the Dáil, "I am satisfied that individuals and families who are being accommodated in publicly funded houses or apartments, whether it be social housing or homes leased from the private rented sector, should not be considered as living in emergency accommodation."²

Section 10 funding is funding from government to local authorities under the 1988 Housing Act combined with a contribution (at 10 percent) of funding directly from each local authorities revenue streams for resources for homeless services. This funding allows local authorities to fund and arrange emergency accommodation.

Minister Murphy has also stated, the "issues which have emerged to me indicate clearly to me that we need improved reporting in this area in order to reflect accurately the numbers of households in emergency accommodation so that we can measure our progress and target our further policies and actions." ³

There are several concerns which arise from these statements. While the re-categorisation by the Department of Housing calls into question the accuracy of the data on homeless populations, it, along with Minister Eoghan Murphy's above statement presents another issue

¹ 741 people were removed from the August statistics and 865 people were removed from the March and April statistics, giving a total of 1,606 people removed.

² Eoghan Murphy, Dáil Debates Vol 968 Col 736 8 May 2018

³ Ibid.

in terms of what definition is being used to determine whether or not a person is considered homeless.

In Ireland, Section 2 of the Housing Act 1988, states that a person is considered as homeless if:

- (a) "There is no accommodation available which, in the opinion of the authority, he, together with any other person who normally resides with him or who might reasonably be expected to reside with him, can reasonably occupy or remain in occupation or
- (b) He is living in a hospital, county home, night shelter, or other such institution, and is so living because he has no accommodation of the kind referred to in paragraph (a). and he is, in the opinion of the authority, unable to provide accommodation from his own resources." ⁴

FEANTSA, a European Federation of organisations working with people who are homeless uses ETHOS Light, a typology which is used for collecting homelessness data. ETHOS Light classifies people who are homeless as being:

- People who are rough sleeping
- People who are staying in emergency accommodation
- People living in homeless accommodation, such as transitional housing or women's shelters
- People living in non-conventional dwellings due to lack of housing
- People living temporarily in conventional housing with family and/or friends due to a lack of housing ⁵

Both Section 2 of the Housing Act 1988 and FEANTSA's ETHOS Light typology all follow similar definitions of homelessness. Given this, the Department of Housing's categorisation report, and Minister Eoghan Murphy's statements to the Dáil, do not take into consideration any of these classifications when collating the monthly homeless statistics.

https://www.feantsa.org/download/fea-002-18-update-ethos-light-0032417441788687419154.pdf [Accessed 25 Oct. 2018].

⁴ Housing Act 1988, No. 28/1988, s.2, Dublin: Stationery Office, available:

http://www.irishstatutebook.ie/eli/1988/act/28/section/10/enacted/en/index.html [Accessed 25 Oct. 18]

⁵ FEANTSA. (2005). European Typology of homelessness and housing exclusion. [online] Available at:

While Merchants Quay Ireland recognises that the Department of Housing's monthly published statistics only include people staying in emergency accommodation, which means that people who sleep rough are not included, they do not take into consideration other homeless populations staying in emergency accommodation. For example, by using the ETHOS Light system people staying in women's shelters, transitional housing and other institutions should also be include in the statistics.

The Department's logic in excluding the above groups from the homeless statistics is that they are not in receipt of Section 10 funding. However, at the same time, with the recent recategorisation, the Department is also excluding people who *are* in receipt of Section 10 funding. The effect in both instances is to reduce the headline statistic for the number of people who are currently homeless in Ireland. In this regard, it was concerning to hear Minister Katherine Zappone's comments that people staying in women's shelters may be excluded from the published homeless statistics due to "political issues" around the homeless statistics reaching over 10,000 people⁶.

Recommendations

It is the view of Merchants Quay Ireland that the statistics currently produced do not show the true extent of the homeless crisis in Ireland.

Firstly, we welcome the role for the Central Statistics Office in the collation of housing statistics. However, given the current housing crisis, we believe both the Department and the public would benefit from the statistics being compiled and released independently from the Department by the CSO.

Secondly, Merchants Quay Ireland would strongly urge both the Central Statistics Office and the Department of Housing to give due consideration to their definition of homeless. The current definition is ad hoc, inconsistent, and out of line with current legislation. We would welcome an expanded statistical release to include rough sleepers, as well as people staying in women's shelters and other institutions.

⁶ Coyne, E. (2018). Homeless figures ignore domestic abuse victims 'because of politics'. *The Times Ireland*. [online] Available at: https://www.thetimes.co.uk/edition/ireland/homeless-figures-ignore-domestic-abuse-victims-because-of-politics-says-zappone-p80v8gkcm [Accessed 25 Oct. 2018].

Thirdly, we believe that there was a need for more transparency, at an earlier opportunity, regarding those who have been identified by the Department as being "supported to remain in their own homes via additional rental supports, funded from the homelessness budget". ⁷

Finally, we would also add that while having accurate and credible data is important for organisations and individuals working in addressing the housing and homeless crisis, this focus on statistics should not take away from the real human trauma that is being experienced by men, women and children trapped in homelessness. The current housing and homeless crisis presents a real moral test to the Government to deliver on its commitment to provide real social and affordable homes urgently.

⁷ Department of Housing, Planning and Local Government. Categorisation of Emergency Accommodation in Monthly Homeless Reports. Accessed online.