



Ireland's Hidden Homelessness Crisis:

**Applying the ETHOS Approach to Defining and Measuring
Homelessness and Housing Exclusion in Ireland**

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Abbreviations

CPS:	Central Placement Service
CSO:	Central Statistics Office
DHLGH:	Department of Housing, Local Government and Heritage
DRHE:	Dublin Regional Homeless Executive
DSVBS:	Domestic, Sexual and Violence Based Services
ESPN:	European Social Policy Network
ETHOS:	European Typology on Homelessness and Housing Exclusion
HAP:	Housing Assistance Payment
HHAP:	Homeless Housing Assistance Payment
HHE:	Homelessness and Housing Exclusion
HNA:	Housing Needs Assessment
HNDA:	Housing Need and Demand Assessment
ICESCR:	International Covenant on Economic, Social and Cultural Rights
IHREC:	Irish Human Rights and Equality Commission
NGO:	Non-Governmental Organisations
NHCC:	National Homelessness Consultative Committee
PASS:	Pathway Accommodation & Support System
PRS:	Private Rental Sector
RAS:	Rental Accommodation Scheme
SSHA:	Summary of Social Housing Assessment
UN:	United Nations
UNCESCR:	United Nations Committee on Economic, Social and Cultural Rights

Executive Summary

A secure, affordable, decent standard home is one of the essential basic human needs and is a human right. Yet unprecedented numbers of people in Ireland are living without this secure base, a place to call home. They are homeless. The scale of this homelessness crisis is a social catastrophe which is having deeply destructive physical and mental health impacts on hundreds of thousands of people in Ireland. The homelessness crisis has become one of the foremost social policy concerns and societal crises in Ireland in recent years. Homelessness has become an entrenched social (and economic) crisis, which is now almost normalised. The normalisation of homelessness is particularly concerning as it can lead to policy lethargy and reduced public concern, and even the deepening stigmatisation of those affected by homelessness.

Despite the progress in reducing homelessness during the COVID period, in part due to specific COVID-related measures including an eviction ban, freeze on rents in the private rental sector, and use of short-term accommodation, homelessness has risen dramatically and consistently since the lifting of these measures in April 2021. Ireland now has the highest levels of homelessness on record. The number of children homeless with their families has increased by 67% in the period from September 2021 (when the Government's Housing For All plan was released), to September 2023. Rising from 2,344 children in September 2021 to 3,904 children homeless with their families in September 2023. Overall homelessness has increased by 51% from 8,475 people in September 2021 to 12,827 in September 2023.

However, this Report, Ireland's Hidden Homelessness Crisis, finds that even these record homelessness figures are a considerable underestimate of the real scale of Ireland's homelessness crisis, due to the failure to consider and measure many people in various forms of 'hidden homelessness'.

Housing market and policy changes including the failure to adequately control rents, the austerity reduction in building of social housing, the shift in housing policy to source social housing from the private rental sector, the promotion of the financialisation of the Irish housing market through the rise of corporate landlords, and a policy reluctance to implement tenancy security has resulted in a rapid rise in new forms of homelessness and housing exclusion in Ireland (Hearne, 2020). Issues affecting the new "hidden homeless"—including housing insecurity, unaffordability, and increased risk of homelessness—have increased dramatically, but we find that current official homelessness data measurements are not fully capturing these new forms of housing insecurity. New types of households and demographic groups previously unaffected by homelessness and housing exclusion are now becoming, and increasingly are at risk of, homelessness. This report analyses Ireland's hidden homelessness crisis using the framework of the European Typology of Homelessness and Housing Exclusion (ETHOS).



We find that the monthly homelessness statistics provided by the Department of Housing and gathered by local authorities are considered by all stakeholders interviewed to provide a vitally important and regular measure of homelessness in Ireland, a way to plan service delivery, to assess effectiveness of services and policy, to hold Government to account by civil society, and should be maintained. There is a consensus that they provide reliable, if somewhat limited data. However, there was strong criticism expressed by some research participants at the reclassification of homeless families by the Department of Housing in 2018, that led to a reduction in official statistics. In a report for the European Commission, Daly (2019, 4) highlighted “statistical obfuscation if not ‘corruption’” relating to Irish homelessness definition, measurement, and statistics.

We find that Irish official homeless statistics are inadequate in capturing the scale of people in homelessness and housing exclusion in Ireland. This is because Ireland’s homelessness statistics and housing policy have an overly narrow conceptualisation, definition, and measurement of homelessness, as it largely defines and measures homelessness as only people in state-funded emergency accommodation.

In contrast to Ireland’s approach to homelessness, measuring hidden homelessness is central to the definition and conceptualisation of homelessness within ETHOS (Amore et al., 2011). ETHOS was devised by FEANTSA, the European Federation of National Organisations Working with the Homeless. ETHOS is considered the international best practice method for conceptualising and defining homelessness and the foundational framework for developing national based measurements of homelessness. The ETHOS framework of defining and measuring homelessness has a wider definition than how Ireland presents and collects data on homelessness.

ETHOS provides a framework which encompasses a broader conceptualisation of homelessness to include various forms of housing exclusion. Within the ETHOS typology are four conceptual categories of homeless

persons: roofless (without any shelter, sleeping rough); houseless (with a temporary place to sleep, in emergency accommodation, institutions or shelters); living in insecure housing (due to insecure tenancies, under threat of eviction or violence); and living in inadequate housing (in caravans on illegal campsites, in unfit housing, in extreme overcrowding).

Countries such as Finland, Denmark, Sweden and Norway have a wider definition and measurement of homelessness, which is more in line with ETHOS than Ireland as they include people in hidden homelessness (staying temporarily with friends and relatives due to the lack of their own place to live) and people awaiting discharge from institutions (hospitals and treatment facilities or release from prison) without a housing solution. Northern Ireland also defines homelessness to include people living in very overcrowded conditions, at risk of violence if they stay in their home, and living in poor conditions that are damaging their health. It measures everyone who presents as homeless, unlike the Republic of Ireland, where we measure only those officially accepted by local authorities as being homeless.

Drawing on the ETHOS framework this report conceptualises and identifies four main areas of hidden homelessness in Ireland that require urgent policy attention, measurement, and responses. This typology of hidden homelessness set out in Figure 1 includes; firstly, people who are experiencing circumstances that are homeless under the ETHOS classification but are not counted in current homelessness statistics in Ireland due to Ireland’s narrow definition of homelessness and administrative reasons.

These include people (mainly women and children) in domestic violence refuges, people in state institutions and care who are due to leave with no housing to go to (care leavers, prisons), families in own-door short term accommodation, long-term homeless accommodation without tenancies, emergency accommodation not funded by the State, people in severe housing insecurity (staying temporarily with friends or family, couch surfing), those in Direct Provision with status and Travellers in substandard accommodation.

For example, there needs to be greater inclusion of those experiencing domestic abuse within homelessness data measurement. An NGO working in Domestic Violence services stated to the research that:

“those experiencing abuse are invisible when it comes to publicly available data on homelessness...those who are homeless, those in refuge accommodation or in supported housing, or a number of different housing solutions, are not captured at all. They don’t form part of the monthly, quarterly or annual stats”

(Interviewee Domestic Violence NGO)

The second area of hidden homelessness identified is the situation of people who ‘present’ as homeless to local authorities but are deemed not to be homeless by the local authority. The narrow housing policy definition of homelessness and narrow interpretation of Section 2 of the 1988 Housing Act means that local authorities are refusing to accept some people who are homeless as being homeless, and therefore they are not being measured as homeless and remain in hidden homelessness.

This second category also includes, as has been highlighted in recent months following the lifting of the eviction ban, people (including families with children) who contact local authority homeless services but are told that there is no (or only inappropriate) emergency accommodation available. These are not counted as homeless, even though they are being evicted out of/have to leave their home, with nowhere to go. They then enter situations of hidden homelessness, sleeping in tents, cars, couch surfing, even emigrating.

Thirdly, there are people who are measured within the homeless statistics but the full nature of their experience is being hidden by the limited way in which homelessness statistics are presented and analysed currently in Ireland, particularly in the monthly homelessness statistics e.g. the duration and flow of child homelessness. There is significant data available that is inadequately analysed. They are qualitatively hidden within the homelessness data. But here too there are also gaps in data, in particular the lack of some data relating to children homeless with their families outside of Dublin.

The fourth category we identify are those experiencing hidden homelessness in the form of housing exclusion and are at risk of/ in potential homelessness. These are hidden in the sense that they are experiencing forms of housing insecurity and inadequate housing, and are excluded from analysis of the housing requirements to tackle homelessness, including, for example, people with disabilities in inappropriate accommodation, and adult children ‘stuck’ living in the parental home.



Figure 1: A typology of hidden homelessness in Ireland

Type of hidden homelessness	Measurement	Experience	Policy
<i>Hidden homelessness 1: Homeless but not counted in homelessness statistics</i>	Experiencing circumstances that are homeless under the ETHOS classification but are not counted in current homelessness statistics	E.g. People in domestic violence refuges, in state institutions and care due to leave with no housing to go to, those in Direct Provision with status	Hidden due to Ireland's narrow definition of, and administrative approach to, homelessness
<i>Hidden homelessness 2 Exclusion of people presenting as homeless</i>	People experiencing homelessness or potential homelessness who 'present' as homeless to local authorities but are deemed not to be homeless by the local authority or not counted due to lack of emergency accommodation	E.g. those contacting local authorities stating they are homeless but local authority refusing their application, and they are therefore not counted	Narrow housing policy definition & narrow interpretation of Section 2 of the 1988 Housing Act means local authorities are refusing to accept some people who present as homeless or due to lack of emergency accommodation
<i>Hidden homelessness 3: Hidden experiences of homelessness</i>	People who are measured within the homeless statistics but the full nature of their experience is being hidden	E.g. the duration and flow of child homelessness, lack of some data relating to children homeless with their families	Limited way in which homelessness statistics are presented and analysed currently in Ireland
<i>Hidden homelessness 4: Housing exclusion (insecure and inadequate)</i>	Experiencing hidden homelessness in the form of housing exclusion and are at risk of/in potential homelessness	E.g. people with disabilities in inappropriate accommodation, adult children 'stuck' living in the parental home	Excluded from Ireland's homelessness definition and measurement

Based on our analysis of the available data, and applying the ETHOS framework, we estimate 23,881 individuals in situations of homelessness (rooflessness and houseless) in Ireland (see Figure 2). This is almost double the current number presented in monthly statistics. While we estimate a further 51,061 in housing exclusion; in insecure and inadequate housing. In total then we estimate 74,942 individuals in homelessness and housing exclusion. It is important to note that this is an estimate, and a likely underestimate of the scale of hidden homelessness in Ireland. For example, the population wide sample survey carried out for the Simon Communities in Ireland found that 190,000 people (5% of the over adult 18 population) had “stayed temporarily with another household, because they don’t have a regular address of their own” i.e. experienced hidden homelessness in the previous 12 months. Over 1 in 10 of young adults aged 18 to 24, which equates to approximately 42,000 people, experienced hidden homelessness in the previous 12 months.

Our research outlined in this report shows that using the ETHOS definition, and including estimates of Ireland’s hidden homelessness, Ireland’s level of homelessness and housing exclusion is significantly higher than the monthly official homelessness statistics.

This data is compiled with a combination of available statistics and estimates, which are detailed throughout the report. This, therefore, is not a definitive measure of homelessness in Ireland, however, it does provide a clear indication that the scale of homelessness and hidden homelessness is significantly greater than current official measurements of homelessness.

Ireland’s narrow definition and measurement of homelessness in monthly and quarterly homelessness statistics which is limited only to those in emergency accommodation results in this large cohort of ‘hidden homeless’ not being counted or measured in homelessness statistics. This means Ireland’s homelessness statistics are not reflecting the true scale of homelessness, and therefore is not responding adequately to meet the needs of those in ‘hidden homelessness’.

Furthermore, in 2022, there were 10,116 NTQs (notices to quit) issued to private renters, while in the first six months of 2023 there were 10,488 NTQs issued. That is a massive scale of housing insecurity and thousands of these are potential homeless as they are unlikely to have anywhere to go to once evicted. Yet these households at severe risk of homelessness are not counted in Ireland. Among these are also people who are officially classed as having their housing needs met in social housing with supports such as the Housing Assistance Payment (HAP), but are actually in a fundamentally insecure form of housing in the private rental sector. If they receive a NTQ from their landlord, they are effectively at risk of homelessness given the gap between HAP limits and market rents and the rental shortage. There are 60,000 households in receipt of the HAP in such an insecure tenure situation. Another group in housing exclusion are some of the 522,486 adults aged 18 years and over living with their parents, the majority of whom want to be living independently, and are insecure and potentially at risk of homelessness if family situations change.

How homelessness is conceptualised and measured impacts on policy effectiveness

This report shows that how we conceptualise and define homelessness is essential as it shapes how we measure homelessness and hence how we formulate evidence-based policy responses. The collection of accurate data and monitoring and measuring homelessness is essential for effective policy responses. In order to end homelessness we need to understand its scale, who is affected, and who is at risk of homelessness. The Irish Government has acknowledged in the 2013 Homelessness Policy Statement that “good data is critical” to provide “realistic and practical solutions” to homelessness (DECLG, 2013: 4). More recently the Lisbon Declaration on the European Platform for Combatting Homelessness of which Ireland is a signatory, includes a commitment to “reliable data on homelessness,” so that there can be a “systematic comparison and monitoring at EU level (2021: 3).

Within the Lisbon Declaration homelessness is defined on a broader basis than Ireland, to include those sleeping rough, being in emergency or transitional accommodation, being discharged from an institution (e.g. prison, hospital, care facility) without an offer of appropriate housing, and facing eviction without assistance for an appropriate housing solution.

The failure to properly measure the scale of hidden homelessness has implications for our current policy and response to homelessness. The failure to measure the broader cohort of 'hidden homeless' means that there is inadequate emphasis within policy and practice on homelessness prevention and a disproportionate emphasis (and expenditure) on the provision of emergency accommodation as the response to 'homelessness', which is defined and measured as those in emergency accommodation.

Because of the narrow definition of homelessness as being only those in emergency accommodation Ireland excludes from measurement (and consequently, service responses) individuals and families who are in hidden homelessness. For example, there are those who for legitimate and understandable reasons, decide not to present as homeless because they do not want to enter emergency accommodation. Some parents report they do not want to bring their children into emergency accommodation because of detrimental impacts on children. These people are forced to become part of Ireland's 'hidden homelessness' because of their legitimate fears of the negative impacts of living in emergency accommodation on themselves, or their children, in terms of physical safety, health and mental health. Whereas in Northern Ireland, for example they measure all those presenting as homeless and provide them with advice and support.

This supports the research by Daly (2019) and Baptista et al (2022, 56) which found Ireland has "limited data on the pool of individuals and households who are at risk of homelessness, because of the emphasis on only defining homelessness in terms of 'homeless places', i.e. living rough, in emergency and temporary accommodation, rather than trying to understand the scale and nature of the

populations at risk of becoming homeless." By neglecting hidden homelessness, Ireland does not fully recognise or sufficiently respond to the true nature of homelessness in Ireland.

So, there is a lack of preventative homelessness responses, because we do not measure within our homelessness statistics, at any level, those in such situations of immediate risk of homelessness, in housing precarity, exclusion and hidden homelessness.

Ireland's definition of homelessness is provided for under primary legislation, Section 2 of the Housing Act, 1988. The Department of Housing stated to this research that "any attempt to meaningfully measure homelessness in Ireland must be oriented around this legislative definition". We concur with this, which means in fact that housing policy and practice and official measurement of homelessness should in fact be operating on a broader conceptualisation than is currently the case as set out in Housing Policy and in practice for the gathering of homelessness statistics by the Department of Housing. We find contradictions within Irish policy and practice in relation to the homelessness definition and measurement such as, between the definition of homelessness in legislation (the 1988 Housing Act) which has a relatively broad definition of homelessness, and the narrower definition of homelessness used in housing policy, homelessness statistics, and the practice of local authorities. Neither the main national housing and homelessness policies of Housing For All nor the Housing for All Youth Homelessness Strategy use ETHOS or make reference to the need for measuring hidden homelessness. This policy approach restricts the preventative potential of overall housing policy.



Children in hidden homelessness

One group in particular which is affected by various forms of hidden homelessness is children. There is a serious deficiency in adequately measuring the number of children experiencing homelessness under the broader ETHOS conceptualisation. This has detrimental consequences in the ability of adequately preventing, responding to, and tailoring service responses and supports to families experiencing homelessness and housing exclusion (insecurity) with children.

There is a failure to measure the homeless experiences of children such as, the length of time and number of children experiencing the trauma of homelessness in the broad range of living conditions outlined under ETHOS such as those living in chronic housing insecurity (e.g. living in a family with an eviction notice and no housing to move to), living in 'hidden homelessness' (couch surfing, sharing with families on temporary basis, care leavers), children with families in domestic violence refuges, in Direct Provision, and Traveller children in unfit accommodation.

Children are particularly affected by homelessness, differently than adults, as they are experiencing this trauma and stress, at key stages in their development. It has longer term impacts, and potentially lifelong impacts. This invisibility of children within housing and homelessness policy results in an inadequate measurement and assessment of the impact of homelessness on children.

We highlight that the experience of homelessness is much more than just being in emergency accommodation. We identify a process of housing insecurity and 'home-loss' that includes periods of time leading up to the forced leaving of a home, the trauma of the experience of the loss of the home, which is additional to the trauma of entering and being in emergency accommodation. There is a need to pay much greater policy attention to this process and measure it within homelessness statistics as this is part of the homelessness experience.

The case of children highlights the other aspect of hidden homelessness we find in Ireland, which is the way in which data, that is available, is 'hidden' by not being properly analysed or presented within the monthly homelessness statistics. Within the public discourse on homelessness, the monthly homelessness figures are the principal focus in public and policy debate. However, as shown in this Report the monthly figures are not a comprehensive guide to understanding the extent of homelessness in Ireland as they do not capture the full picture of the actual data available on homelessness in Ireland, and do not present the full scale of those experiencing the trauma of homelessness (the flow data), which is being gathered by local authorities, but not presented publicly.

This report shows, for the first time, the scale over time of children experiencing homelessness in emergency accommodation in Dublin. Our analysis of data provided to the research by the DRHE shows that 12,804 unique children with their 6,759 families entered emergency accommodation between 2016 to 2023. The data outside of Dublin was not available according to the Department of Housing. However, based on extrapolation of Dublin figures we estimate that at minimum, 17,000 children have experienced homelessness in emergency accommodation in Ireland since 2016. That is a truly shocking figure.. The gap in national data indicates a lack of priority given in policy to the range of homelessness being experienced by the most vulnerable group in Irish society – children. Further analysis that is hidden from the monthly reports, shows the dramatic increase in the length of time families and children are being forced to stay in homelessness in emergency accommodation. Our analysis of the Quarterly Progress Reports shows that nationally, in September 2023, almost two thirds, 63% (1,206 families, 2,533 children), were living in emergency accommodation for longer than 6 months, 42% (805 families, 1,690 children) were there longer than 1 year, while 16.5% (316 families, 664 children) were there longer than two years.

That is a period of time that is likely to leave long lasting negative impacts on children, in some instances essentially robbing children of their childhood, and leaving them with life lasting negative impacts.

We also found that the number of families (and children) in emergency accommodation longer than 6 months grew by 80% from 669 in July 2022 to 1,206 families in September 2023. The number of families in emergency accommodation for longer than 12 months grew by 105% from 393 in July 2022 to 805 in September 2023. While those there longer than 24 months grew from 180 to 316 i.e. by 76%.

These numbers are truly scandalous, and they are in one period of time. We show that there are thousands of children spending extended and damaging periods in emergency homeless accommodation in Ireland, and many thousands more in hidden homelessness, and yet we don't properly measure, track, support, or respond to their needs, but most significantly we are failing to provide proper policies that prevent any children entering homeless accommodation.

There should be no children becoming homeless in one of the wealthiest countries in the world. It is a truly damning indictment of the Irish Government, the state, housing policy, and the housing system that there are thousands of children each year experiencing the trauma of homelessness. The extent of the scale of homelessness affecting children is not shown adequately in monthly homelessness statistics.

The scale of child (and family) homelessness and length of time children are being left in emergency accommodation is a gross violation by the Irish State of the basic human rights of children who are in homelessness in Ireland.

Re-classification of homelessness damaged legitimacy of homelessness figures

We also find a political dimension in the measuring and reporting of homelessness data. A number of policy decisions such as re defining those in own door accommodation as being no longer homelessness and stating that those in HAP are no longer in 'housing need', points to

attempts to reduce homelessness and housing need numbers, by recategorization, rather than actually meeting the real housing need. This is neither ethical nor effective policy. It appears to be an attempt to conceal and reduce the scale of the crisis rather than measuring its true scale and responding adequately.

Recommendations

Ireland is not fulfilling its obligation under international human rights treaties to adequately measure homelessness. The UN obligation to fulfil the right to housing, which Ireland has signed up to, includes implementing measures;

“to measure the extent of homelessness, disaggregated by gender, race, disability and other relevant characteristics, and to establish effective means of monitoring progress....The focus of human rights-based measurement of homelessness should be on prevention and on addressing underlying causes”.

(UN, 2018).

Irish housing policy is not measuring accurately the wider hidden homelessness crisis that is behind the ongoing rise in presentations into homelessness as people's housing situation becomes even more precarious. If there was an acceptance in policy of a broader definition and measure of homelessness, then policy could be more effective.

Ireland's narrow conceptualisation of homelessness leads to inadequate measurement and therefore it is more likely policy responses are going to be inadequate as they are not developed on an adequate evidence base.

There is a failure to align national policy and practice with the commitments within the Lisbon Declaration on homelessness. Policy therefore underestimates the real levels of homelessness and restricts potential preventative policies and measures that a broader conceptualisation and measurement of homelessness, such as the ETHOS, would provide.

Our main recommendation is that ETHOS should be adopted as the way to conceptualise, define and measure homelessness in Irish housing policy. We recommend therefore, that the Irish Government implement the ETHOS framework to measure and respond adequately to those in hidden homelessness, housing exclusion and potential homelessness.

There are also issues that should be improved in the presentation of current data on homelessness, and also there is a need to collate and measure other data on homelessness as we have outlined in our recommendations.

We recommend the inclusion in homelessness statistics, on a quarterly or annual basis, of a data base of homelessness based on the ETHOS classification.

A broader interpretation of the concept of not being 'reasonably able to occupy' in the Housing Act would enable a broader definition and measurement of homelessness.

We need more accurate definitions and measurement in order to ensure informed policy analysis, policy responses and public debate. More accurate and broader measurement of homelessness and housing exclusion in Ireland is essential in order to ensure the adequate understanding of the range of experiences, risks and situations of homelessness, including hidden homelessness and housing insecurity, essential in ensuring effective preventative policy responses to avoid, prevent and reduce homelessness.

The large numbers being made homeless is a social catastrophe which is causing huge and deep personal human trauma to each individual experiencing it. This points to a deeply structural problem in the Irish housing system that is producing a massive scale of

homelessness with catastrophic impacts on people experiencing it.

We must properly measure homelessness in order to respond adequately and, ultimately end it.

Report outline

Following the Executive Summary, the Report begins with an estimation of Ireland's homelessness figures when the ETHOS framework is applied. This is followed by a background overview of ETHOS and the key issues addressed in the research, including the research methodology. Section 2 then describes Ireland's current approach to defining and measuring homelessness. Section 3 outlines why accurate and timely data is important and Irish housing policy in this area. Sections 4, 5, and 6, and 7, then present the main findings of the research. Section 4 details Hidden Homelessness 1; people experiencing homelessness under the ETHOS classification but not counted in current homelessness statistics. Section 5 details Hidden Homelessness 2; Exclusion of people presenting as homeless due to narrow definition of homeless and lack of emergency accommodation. Section 6 details Hidden Homelessness 3; Hidden within the data: hidden experiences of homelessness (children & families). Section 7 details Hidden Homelessness 4; Housing Exclusion (insecure and inadequate). While in Section 8 we present twelve recommendations for policy makers.



Ireland's homelessness numbers using ETHOS classification

Figure 2. Homelessness and Housing Exclusion in Ireland using the ETHOS classification

Conceptual Category		Operational Category	Living Situations
Roofless	1	Living rough	125
	2	Staying in a night shelter	12847 ¹
Houseless	3	People in accommodation for the homeless	1606 ² 200 ³
	4	People in women's shelter/Domestic violence refuge	1300 ⁴
	5	Accommodation for immigrants	5000 ⁵
	6	People due to be released from institutions	Prisons 505 Medical 321 Children 205
	7	People receiving longer term support due to homelessness	1,772
Roofless and houseless sub-total			23,881

1 Number of individuals in Section 10 emergency accommodation

2 Number of adults and children in homelessness supported in accommodation taken out of homelessness statistics in 2018/19

3 Non Section 10 emergency accommodation

4 Estimated need of domestic violence refuge spaces for Ireland under Istanbul Convention, equating to 1,300 women and children in refuges or hidden homeless

5 International protection applicants in Direct Provision with legal right to remain but unable to leave because of inability to access housing

Insecure	8	People living in insecure accommodation (temporarily with family/friends, no legal sub/tenancy)	17,984 ⁶ 14,752 ⁷
	9	People living under threat of eviction	1282 ⁸ 2899 ⁹
	10	People living under threat of violence	N/A
Inadequate	11	People living in temporary/non-conventional structures (mobile homes)	2430 ¹⁰
	12	People living in unfit housing	2421 ¹¹
	13	People living in extreme overcrowding	9,293 ¹²
Insecure and Inadequate sub-total			51,061
Total homeless using ETHOS classification			74,942

6 Individuals 'Living with friends/relatives' on social housing waiting lists (SSHA)

7 'Living with Parents' on SSHA

8 Individuals facing eviction in private rental sector but overholding

9 Unsustainable mortgages. Living under threat of eviction.

10 Traveller accommodation need identified in SSHA

11 Individuals in SSHA 'unfit housing'

12 Individuals in SSHA 'overcrowding'

1.

Introduction



1. Introduction

1.1 Background: Housing as a fundamental human right

A safe, secure home, of a decent standard, is central to our very existence, our physical health and overall wellbeing. The importance of a home is shown most clearly by what happens to people when they don't have one. It is visible in the devastating physical and mental health impacts on people who are homeless, in particular on children. Access to adequate housing is central to family life and child development, as the home is the place where children grow up and the arena in which the most fundamental social relationships are sustained (Hearne, 2020; 2022).

When control over our housing situation is low (such as being in housing financial stress or living in fear of eviction from rented accommodation), ontological security is reduced, which results in chronic stress. Housing is, therefore, an essential prerequisite in enabling a person to exercise choices in almost every area of life required to maximise personal, family, and community wellbeing.

In recognition of the fundamental role that housing plays in our lives in terms of providing a decent standard of living and enabling us to live with dignity, housing is a fundamental human right. The 1966 United Nations International Covenant on Economic, Social and Cultural Rights (ICESCR) has been ratified by almost 150 states including Ireland. Article 11 is clear that “[t]he States Parties to the present Covenant recognize the right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing, and to the continuous improvement of living conditions.” All the States signed up to this Covenant agreed to ‘take appropriate steps to ensure the realization of this right’. The UN defines adequate housing as having: (CESCR, 1991):

1. Legal security of tenure;
2. Availability of services, materials and infrastructure;
3. Affordable housing;
4. Habitable housing;
5. Accessible housing;
6. Location;
7. Culturally adequate housing.

Appropriate policies and laws geared towards the progressive realisation of housing rights, form part of the obligation to implement the right to housing. Progressive realisation involves meeting the rights obligations to a higher standard to the maximum of a state's available resources (Kenna, 2005).

The need to take a trauma informed approach to defining and measuring homelessness

All aspects of homelessness and housing exclusion-from housing insecurity, to the loss of a home, to living in hidden homelessness, to spending time in emergency accommodation, are psychologically damaging and traumatic experiences, particularly for children (Hearne, 2022). That is why it is essential that all steps in the process of becoming homeless and being in homelessness, and the diverse aspects and forms of housing precarity and exclusion should be included in conceptualisations and definitions of homelessness and measured and included in data.

How we measure and conceptualise homelessness impacts on how we respond to homelessness. It is essential to put the human experience and trauma of homelessness central to homelessness discussions and analysis, including data gathering and measurement. The data represents human beings experiencing the most egregious violation of the human right to housing.

Experiencing homelessness as a child is an Adverse Childhood Experience, it potentially leaves life-long impacts (Hearne, 2020). A child who has experienced homelessness is significantly more likely to experience negative outcomes in adulthood, including mental health difficulties, unemployment, substance abuse and so on.

The 2017 report 'Investing in the Right to A Home: Housing, HAP and Hubs' (Hearne & Murphy, 2017) highlighted the severe impact of emergency accommodation on children. It found severely damaging impacts of homelessness and housing insecurity on child and family wellbeing. This included the lack of an adequate home having detrimental impacts on children's physical, cognitive and emotional development.

A child's resiliency skills can be extremely challenged if the family is under huge stress in insecure housing or in emergency accommodation. It is easy to appreciate the negative impact on children's wellbeing of living in unsuitable settings for extended periods of time, and how the experience would result in significant challenges in leading a healthy and well-adapted life in the future.

This highlights the need to expand our conceptualisation and understanding of homelessness as an experience that does not only include being in emergency accommodation or roofless, but also includes processes leading up to becoming homeless: the process of 'home-loss'. The process of becoming homeless can extend for significant time periods, involving multiple types of housing exclusion, such as living in housing insecurity (when there is stress, anxiety and fear experienced about the living situation and becoming 'homeless'), the experience of losing your home (the process of leaving a place not knowing where you are going to be living, eviction, having to present as homeless to local authority), hidden homelessness, and inadequate housing, which all result in significant stress and trauma, including chronic housing stress, with physical and mental health impacts, even before entering emergency accommodation.

All parts of this process of becoming and being homeless are psychologically damaging, traumatising and severely negatively impact those affected.

The ETHOS framework enables policy to provide a rights based and trauma-informed conceptualisation, definition and measurement of homelessness.

1.2 Research Overview

This research applies the ETHOS framework and human rights lens to analyse Ireland's current definitions, conceptualisation, and measurement of homelessness and housing exclusion. It identifies the scale of Ireland's 'hidden' homelessness crisis. It investigates whether the ETHOS framework should be applied to homelessness policy and data measurement in Ireland, exploring the positives and negatives, barriers, and institutional arrangements required to implement the ETHOS framework as a public policy monitoring tool of Homelessness and Housing Exclusion (HHE). It gathers cross sectoral views and experience on concepts, definitions, measuring HHE and implementing ETHOS in Ireland.

The research aims to provide new knowledge for policy makers, civil society and the public to understand and monitor the scale and nature of homelessness in Ireland and enhance civil society, policy makers and academic knowledge and understanding of the nature and scale of Ireland's HHE crisis. It aims to contribute to the methodological approaches of how homeless statistics are compiled and data, and thus contribute to evidence informed policy making, accurately measuring Ireland's progress in ending homelessness and civil society knowledge and enhanced public debate. It provides recommendations for policy and practice on understanding, defining and measuring Ireland's homelessness and housing exclusion.

This project received funding from the Irish Research Council under its New Foundations Awards, under the strand ‘Enhancing Civic Society.’ These are discrete collaborative projects between researchers and civic society groups in the community and voluntary sector. The research project was led by Dr Rory Hearne, Department of Applied Social Studies Maynooth University, and the civic society partner was the Jesuit Centre for Faith and Justice. The Jesuit Centre for Faith and Justice works to combat injustice and marginalisation in Irish society, through social analysis, education and advocacy. The liaison partner with this project was the JCFJ policy officer, Keith Adams. Research assistant on the project was Kenneth McSweeney, Department of Applied Social Studies, Maynooth University.

1.3 Research methodology

This project uses a mixed methods –quantitative and qualitative research – approach. The project methodology and research was co-developed with the civil society partner, the Jesuit Centre for Faith and Justice (JCFJ). The methodological approach involved desk research on the definition and conceptualisation of homelessness and housing exclusion (HHE) based on ETHOS, Human Rights and other relevant frameworks and indicators. A detailed literature review was developed.

An in-depth policy analysis, documentary analysis and data analysis were undertaken of key housing and homelessness policy and data in Ireland including amongst others, Housing For All, the Youth Homelessness Strategy, the Department of Housing Homelessness Statistics (monthly and quarterly), and the Social Housing Assessment of Needs.

Furthermore, semi-structured, in-depth, interviews were undertaken with 12 key stakeholders in the area of homelessness and housing policy and practice in Ireland.

These included;

- Policy and research experts from NGOs/ Charities working in homelessness (five interviews), including community law and civil society NGOs working with and representing particular groups affected e.g., Travellers and Domestic Violence
- Policy and research experts working as practitioners and researchers in homelessness and data collection in statutory and non-statutory bodies (five interviews)
- Academic/research experts working in universities and state research bodies (two interviews)

The interviewees are anonymised in the research and quotations within the Report refer to them as one of the following interviewee types; Homelessness NGO, Traveller NGO, Domestic Violence NGO, Community Law Solicitor, Policy analyst/academic, State practitioner.

The Department of Housing responded by email to a set of questions, and their responses are included in the Report.

The interviews investigated the stakeholders’ views and experience on the following:

1. the definition of and conceptualisation of HHE in Ireland;
2. their assessment of current measurement of HHE (level and process) & available data;
3. perception of ETHOS and potential for its application in measuring HHE;
4. institutional measures required for implementation.

The interviews were transcribed (focusing on key areas relevant to research questions), coded and analysed using thematic analysis, anonymised, and written up to contribute to the overall research findings.

This data was compiled and analysed and combined with policy analysis, documentary analysis and data analysis of HHE policy and data in Ireland and written up into this Report.

1.4 The ETHOS Framework of Homelessness

The European Typology on Homelessness and Housing Exclusion (ETHOS), developed by FEANTSA and the European Observatory on Homelessness, is widely accepted as the most appropriate and comprehensive conceptual framework to define, conceptualise, and measure homelessness and provides the basis for gathering and interpreting homelessness statistics (Edgar, 2012; Amore et al, 2011; Busch-Geertsema, 2010). ETHOS acts as a tool for transnational discussion of homelessness and can be adapted for different policy purposes, including mapping homelessness, as well as developing, monitoring and evaluating policies¹³ (FEANTSA, 2007).

In comparison to national definitions of homelessness, including Ireland's, the ETHOS conceptual definition is quite broad in how it defines and categorises homelessness and housing exclusion. ETHOS was developed in the context of the EU social inclusion strategy that was launched by the European Council of Lisbon in 2000 (Edgar 2012). According to Edgar et al, "undoubtedly, homelessness is amongst the worst examples of social exclusion. Therefore, it is a valuable exercise to consider the varying "extent and depth" of different forms of homelessness" (2009: 15).

Edgar et al, 2007, explain that the conceptualisation of ETHOS emerged from the need to understand that in order to implement policy that can prevent homelessness and reduce its impact on vulnerable households, information is required that reflects the reality of the process of homelessness and housing exclusion. Thus, they explain, "hidden homelessness should be visible to policy makers and service providers". They point out that this means having an understanding and measurement of a broad range of homelessness

experiences, such as people who live in insecure housing, are forced to move constantly between inadequate housing situations and those who are forced to live in housing which is unfit for habitation by commonly accepted norms. As they explain

..for policies that aim to ensure fewer people should become homeless, information is needed to monitor accurately, not just the total number of homeless households but also;

- *"the number living in temporary or insecure / inadequate housing and*
- *the number who are potentially homeless or are threatened with homelessness..".*

(Edgar et al., 2007, pp.11-12)



¹³ ETHOS light is a less comprehensive form of the typology and "was developed for a desk-based study on behalf of the European Commission on the measurement of homelessness at EU level" in 2007. The study, Measurement of Homelessness at European Union Level, used a harmonised definition of homelessness for statistical purposes. It is a pragmatic tool for the development of homelessness data collection, rather than a conceptual and operational definition to be used for a range of policy and practice purposes. (Busch-Geertsema, 2010: 26) (FEANTSA 2017) (Edgar et al, 2007) See Figure 3.

“Hidden homelessness, i.e., staying in precarious/insecure arrangements with friends, family or acquaintances because there is nowhere else to go, is defined and counted as homelessness in some EU countries. For example, Denmark, Sweden and Germany (in regional statistics) record this form of homelessness, but it is not recorded, or even necessarily defined as ‘homelessness’, in others” (Baptista et al 2017: 8). Potential homelessness, i.e. the number of households at risk of homelessness is not widely recorded across Europe. In UK administrations households that present themselves to local authorities as at risk of homelessness are recorded

(Baptista et al, 2022)

The ETHOS typology conceptualises various aspects of HHE which can help measure a specific cohort within the population who are in homelessness. It covers people living rough which is at the most severe end of homelessness, to other aspects of housing exclusion such as people living in insecure accommodation who are staying with family and friends, who are described as ‘hidden homeless’.

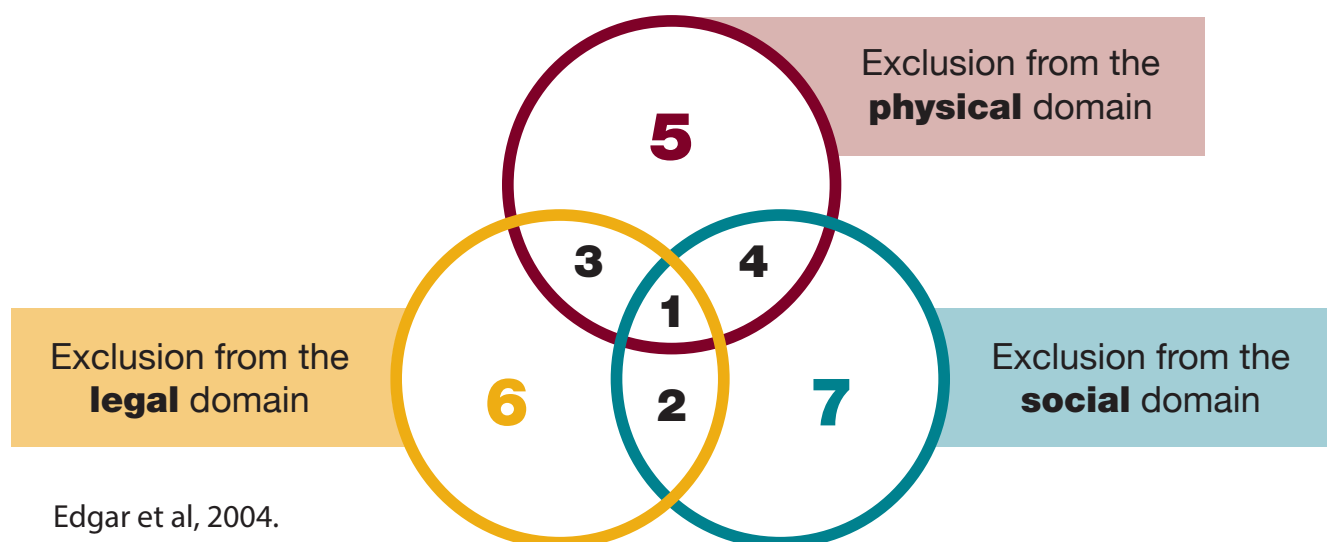


ETHOS identifies three domains that comprise a home, namely the physical domain, the legal domain and the social domain (see Figure 3). According to Edgar et al, “in order to define homelessness in an operational way, we identified three domains which constitute a home, the absence of which can be taken to delineate homelessness”. Within ETHOS having a home (adequate housing) can be understood as: having a decent dwelling (or space) adequate to meet the needs of the person and his/her family (physical domain); being able to maintain privacy and enjoy social relations (social domain) and having exclusive possession, security of occupation and legal title (legal domain)” (2009: 15).

The three domains overlap and “are said to relate to each other”. These three domains “are identified as constituting a home” and conversely “living situations that are deficient in one or more of these domains are taken to represent homelessness and housing exclusion” (Amore et al, 2011: 24). The ETHOS model, therefore, defines different living situations as either homelessness, housing exclusion, or adequate housing according to the physical, legal, and social domains.

Within ETHOS, homelessness occurs when someone lacks all three domains, i.e. they are living rough and when they lack the social and legal domains, who are described as ‘houseless’ people (Baptista et al, 2022)

Figure 3. The 3 domains of homelessness & housing exclusion



The ETHOS Typology then develops four conceptual categories of HHE; roofless, houseless, insecure and inadequate (see Figure Four below). Each of these four conceptual categories have associated operational categories describing actual experiences of homelessness and housing exclusion. There are 13 operational categories of HHE. For example, the conceptual category of roofless has two corresponding operational categories which are “people living rough”, and “people staying in a night shelter”.

The operational categories are then further each divided into “living situations”. For example, the operational category of “people in accommodation for the homeless” has corresponding living situation categories of “homeless hostel”, “temporary accommodation” or “transitional supported housing” and these living situations are defined as “where the period of stay is intended to be short term” (Edgar 2009: 73).

Figure 4. ETHOS European typology on homelessness and housing exclusion

Conceptual category	Operational category		Living situation	
ROOFLESS	1	People living rough	1.1	Public space or external space
	2	People staying in a night shelter	2.1	Night shelter
HOUSELESS	3	People in accommodation for the homeless	3.1	Homeless hostel
			3.2	Temporary accommodation
			3.3	Transitional supported accommodation

	4	People in a women's shelter	4.1	Women's shelter accomodation
	5	People in accomodation for immigrants	5.1	Temporary accomodation, reception centres
			5.2	Migrant workers' accomodation
	6	People due to be released from institutions	6.1	Penal institutions
			6.2	Medical institutions
			6.3	Children's institutions/homes
	7	People receiving longer-term support (due to homelessness)	7.1	Residential care for older homeless people
			7.2	Supported accomodation for formerly homeless persons
INSECURE	8	People living in insecure accomodation	8.1	Temporarily with family/friends
			8.2	No legal (sub) tenancy
			8.3	Illegal occupation of land
	9	People living under the threat of eviction	9.1	Legal orders enforced (rented)
			9.2	Repossession orders (owned)
	10	People living under threat of violence	10.1	Police recorded incidents
INADEQUATE	11	People living in temporary/non-conventional structures	11.1	Mobile homes
			11.2	Non-conventional building
			11.3	Temporary structures
	12	People living in unfit housing	12.1	Occupied dwelling unfit for habitation
	13	People living in extreme overcrowding	13.1	Highest national norm of overcrowding

Edgar, 2009: 73.

We can see then within the ETHOS conceptualisation of homelessness is included people who are:

Roofless: living rough, staying in a night shelter

Houseless: in accommodation for the homeless, women's shelters, accommodation for immigrants such as reception centres, people due to be released from institutions; penal, medical, children, people receiving longer term support due to homelessness e.g., residential care for older homeless, supported accommodation for formerly homeless persons

Insecure: people living in insecure accommodation (temporarily with family/friends, no legal sub/tenancy, illegal occupation of land, people living under threat of eviction, people living under threat of violence

Inadequate housing: People living in temporary/non-conventional structures (mobile homes), people living in housing unfit for habitation, people living in extreme overcrowding.

What is significant in this is that ETHOS includes in its definition of homelessness: people in women's refuges, migrant accommodation, people in institutions (health, care, penal) who's stay is longer than necessary due to lack of housing or who have no housing available prior

to release. It also defines situations of housing exclusion, i.e. excluded from the physical and legal domains or from the physical and social domains, or from any one of the physical, social and legal domains, in two other categories of 'insecure' and 'inadequate' housing. (Baptista et al, 2022). In terms of insecure housing it includes those 'couch surfing', living temporarily with family and friends due to the lack of housing and is not the persons usual place of residence, and those living under threat of eviction. While they also include those living in 'inadequate housing' in extreme overcrowding and uninhabitable housing (poor housing conditions).

There is also an ETHOS light version (Figure 5), a less comprehensive form of the typology developed on behalf of the European Commission on the measurement of homelessness at EU level in 2007. It is a pragmatic tool for the development of homelessness data collection, rather than a conceptual and operational definition to be used for a range of policy and practice purposes (FEANTSA 2017; Busch-Geertsema, 2010; Edgar et al, 2007). ETHOS Light, like the original ETHOS, counted potential homelessness among people living in institutions who had nowhere to move into when they left, such as prisons and long-stay hospitals.

Figure 5 ETHOS Light

Operational category	Living situation	Definition
1 People living rough	1 Public space/external space	Living in the streets or public spaces without a shelter that can be defined as living quarters
2 People in emergency accommodation	2 Overnight shelters	People with no place of usual residence who move frequently between various types of accommodation

3 People living in accommodation for the homeless	3 Homeless hostels 4 Temporary accommodation 5 Transitional supported accommodation 6 Women's shelter/refuge	Where the period of stay is less than one year
4 People living in institutions	7 Health care institutions 8 Penal institutions	Stay longer than is needed because of lack of housing/no housing available on release
5 People living in non-conventional dwellings due to lack of housing	9 Mobile homes 10 Non-conventional buildings 11 Temporary structures	Where the accommodation is used due to lack of housing and is not the person's usual place of residence
6 Homeless people living temporarily in conventional housing with family and friends (due to lack of housing)	12 Conventional housing, but not the person's usual place of residence	Where the accommodation is used due to lack of housing and is not the person's usual place of residence

Based on Edgar et al. (2007)

Baptista et al. (2022) highlight that category six, which encompasses hidden homelessness is the least widely recognised form of homelessness, and is a group in which women appear to be more strongly represented. Family homelessness, most of whom are lone women parents, can be undercounted if this form of homelessness is not counted.

Narrower definitions of homelessness, i.e. focusing on categories 1–3 of ETHOS light, risk generally undercounting populations that are effectively homeless, i.e. lacking security of tenure, physical control over their living space, privacy and the usual benefits of a settled, adequate, affordable home. Baptista et al. (2022) highlight that, in Ireland, existing definitions, which currently centre on people being in what are defined as 'homeless places', i.e. in emergency accommodation or on the street, risk undercounting housing exclusion and hidden homelessness. In turn, this focus means that women, young people and other populations experiencing hidden homelessness,

which ultimately means no legal or physical security and may often mean limited privacy or control over living space, are undercounted in Ireland. Importantly, the population from which people experiencing homelessness are likely to come, i.e. low income households experiencing housing exclusion, is not fully understood either.

A wider definition of homelessness means a broader policy response to prevent homelessness

Baptista et al. (2022) highlight that a wider definition of homelessness means that broader interventions concerned with many manifestations of homelessness are developed: "A wider definition tends to reflect and reinforce a 'broadband' homelessness policy intended to reduce the risks of homelessness on multiple levels.

In essence, a policy that promotes widespread prevention, an integrated, cross-agency and cross-departmental response when homelessness is associated with multiple and complex needs and which devotes significant resource to increasing social and affordable housing supply is more likely to be effective if homelessness is broadly defined”.

Finland, Baptista et al (2022) point out, defines homelessness in broad terms. Most homelessness that exists in Finland is hidden homelessness. Finland’s housing-led approach and strong emphasis on interagency working, social housing supply and preventative services keeps homelessness very low, but it does this in part by defining the issue broadly and delivering services to all the populations at risk of homelessness, alongside those at risk of repeated or sustained homelessness. A wider

definition reinforces strategic effectiveness because more of the population who are at risk of homelessness have access to housing and support within the integrated Finnish strategy (Y Foundation, 2017 and 2022). In New Zealand, also ETHOS is used to develop the official State definition of homelessness (SNZ, 2015). The ETHOS framework was modified to meet its societal, cultural, and environmental contexts. New Zealand developed four conceptual categories for defining homelessness: without shelter, temporary accommodation (notably includes hostels for the homeless, transitional supported accommodation for the homeless, and women’s refuges), sharing accommodation (living situations that provide temporary accommodation for people through sharing someone else’s private dwelling e.g., sharing with family/friends), and uninhabitable housing.



2.

How Ireland defines and measures homelessness



2. How Ireland defines and measures homelessness

2.1 Legislative basis

Ireland's legislative basis (statutory instruments) in relation to housing are the Health Act 1953, the Housing Act 1988, the Child Care Act 1991, and the Housing (Miscellaneous Provisions) Act 2009. Ireland's legislative definition of homelessness is outlined in Section 2 of the Housing Act 1988:

"A person shall be regarded by a housing authority as being homeless for the purposes of this Act 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 of, 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 (Government of Ireland: 1988)

It is important to highlight here, and we discuss it in detail later, that this definition includes a wide potential range of homelessness situations, beyond what it is counted in monthly homelessness statistics.

It certainly includes the first two conceptual ETHOS categories which are "roofless" and "houseless" and could be argued also legislates for wider aspects of housing exclusion. It arguably includes operational categories 1 to 7, namely "people in a women's shelter", "people

in accommodation for migrants", and "people due to be released from institutions" which are operational categories 4, 5 and 6 respectively. While even those in extreme overcrowding or couch surfing in hidden homelessness, could be defined as being homeless under the clause (a) within the Act, as they could not be expected "reasonably occupy" such accommodation. However, local authorities and housing policy which implement this legislation take a much narrower definition and measurement of homelessness.

It is worth noting that the CSO in Censuses 2011, 2016 and 2022 drew on the ETHOS framework and took a wider definition and measurement of homelessness to include rough sleepers, those in emergency accommodation for the homeless, in women's shelters and in long term homeless accommodation. Census 2016 included individuals in non-state funded homeless accommodation identified by the CSO and agencies/service providers involved in providing support to homeless people and persons in domestic violence services. The findings of Census 2022 on homelessness are set to be released in November 2023.



2.2 Homelessness Statistics in Ireland: Monthly and Quarterly Reports.

The definition for measuring and gathering homelessness statistics in Ireland was informed by the National Homeless Consultative Committee (NHCC) in conjunction with the Department of Housing and defines homelessness for statistical purposes as those accessing emergency accommodation funded under Section 10 of the Housing Act 1988, which provides for local authorities to make arrangements to provide “accommodation for a homeless person”, including financial arrangements and assistance.

In relation to ETHOS categories, official homelessness statistics in Ireland are measured as a combination of just categories 1, 2 and 3. The monthly homelessness figures just measure categories 2 and 3, as they do not count rough sleepers (they are counted in quarterly reports, see below). The monthly figures, therefore, have limitations and represent a narrow and specific measure which captures only those in Section 10 emergency accommodation (Daly, 2019; O’Sullivan, 2018; Stanley, 2021).

Official statistics on homelessness in Ireland are published on a monthly and quarterly basis. The monthly reports are produced by the local authorities through the Pathway Accommodation & Support System (PASS), collated on a regional basis and compiled and published to www.housing.gov.ie, typically on the last working Friday of every month. PASS is administered by the Dublin Regional Homeless Executive (DRHE) (DHLGH, 2021). PASS is an administrative system that records the number of people within emergency accommodation. In addition to the monthly reports there are national Quarterly Progress Reports and Regional Performance Reports which include details on the number of adults who have been accepted as homeless under Section 2 of the Housing Act 1988 (including adults who presented as homeless but were prevented from entering homelessness by means of a tenancy).

Different countries measure homelessness using different systems – some using administrative data, some through surveys and others using systems to ‘estimate’ levels. Administrative data provides more regular data, but it is narrower in who it counts, while survey data can cover broader experiences of homelessness but is less regular and more expensive. Ireland has used robust administrative data (information entered on to the PASS database - recently upgraded to PASS 2) to report a narrow definition of homelessness (the number of people staying overnight in emergency accommodation paid for by the Department of Housing any night in the reference week)¹⁴.

2.1.1 Monthly Reports

The monthly figures are available on the Department of Housing, Local Government and Heritage website (DHLGH, 2021). The monthly reports based off the PASS administrative data only count those individuals in designated emergency accommodation and temporary accommodation provided by the State and funded under Section 10 of the Housing Act 1988 (GOI, 1998).

The data is broken down by regional basis, by form of emergency accommodation, and by age. The different forms of accommodation include private emergency accommodation, (PEA) which includes hotels, B & Bs and other residential facilities, Supported Temporary Accommodation, (STA) which includes family hubs with onsite support, and Temporary Emergency Accommodation, (TEA) which is emergency accommodation with no support (DHPLG, 2022). A shortcoming is that the type of accommodation where families and children are being accommodated is not presented in the data.

¹⁴ PASS 2 has the potential to address some of the shortcomings of existing data or to supplement it with additional details. The changes will also allow for additional data to be reported in the Homeless Progress Report, which is published quarterly by the Department (DHPLG, 2021).

2.1.2 Local Authority Regional Performance Reports

There are nine administrative regions for homeless services, with one local authority acting as the main authority in each region, who collate and provide statistics for the Regional Performance Reports (the Homeless Quarterly Progress Report and the Homeless Performance Report), which are released on a quarterly basis (DHPLG, 2021). The Performance Reports are more comprehensive than the monthly statistics. However, they are under reported in media coverage with the emphasis being primarily on the monthly reports. The Homeless Quarterly Progress Reports have a longitudinal aspect and cover a range of indicators including rough sleeping, new and repeat presentations to emergency accommodation, data on those prevented from entering homelessness, time spent in emergency accommodation, the number of adults exiting emergency accommodation,

and into which type of tenancy. It also shows whether those who have moved into tenancies receive supports when they move on, and the number of individual adults in emergency accommodation with support plans. They capture the 'flow' (presentations, in, out) data on homelessness, and have a longitudinal aspect that shows developments in homelessness over time (DHPLGH, 2021).

2.1.3 Homeless Quarterly Progress Reports

The Homeless Quarterly Progress Reports summarise the data contained in the regional performance reports. The Quarterly Progress reports also have detail on Housing First tenancies created and the number of individuals residing in Housing First (DHPLGH, 2021). In Figure 6 we outline the various aspects of homelessness and how they are categorised, measured and reported in Ireland.

Figure 6. Ireland's homelessness statistics

Monthly Reports	Quarterly Progress Report	Homeless Performance Report Quarter
Number of adults and children in emergency accommodation.	Number of individuals exiting homeless into tenancies and what type of tenancy, in each region.	Scale and extent of Homelessness
The numbers of adults and individuals in emergency accommodation for each region and county.	Duration in emergency accommodation for adult individuals. For Dublin only, data on families presenting and deemed by the local authority as being homeless and the duration in emergency accommodation.	Exits from homelessness and into what type of accommodation and in which region.

Form of accommodation individual adults accessing emergency accommodation are in each of the nine regions, namely PEA, STA or TEA.	New and repeat presentations to emergency accommodation.	Family Presentations, (only those deemed as homeless by the LA) Preventions and Exits (Figures only available for Dublin).
Age profile of adult cohort accessing emergency accommodation.	Rough Sleeping by each region. Not all regions count rough sleeping.	Number of Housing First tenancies created and number of individuals residing in Housing First tenancies and in which region.
-	Data on the number of those prevented from entering homelessness	-
-	Number of those moved onto independent living with support or without.	-



3.

The importance of accurate and timely data on homelessness



3. The importance of accurate and timely data on homelessness

3.1 Monthly homeless statistics are important data

The Irish Government, the Department of Housing, academic experts, homelessness NGOs and civil society all agree on the importance of accurate and timely data collection to properly measure, and respond to, homelessness, and understand the causes and impacts of homelessness. There is a consensus that for effective prevention and policy making accurate data is vital to address homelessness and correct policy responses.

The Department of Housing stated in response to this research that,

“The accurate enumeration of homeless individuals and families is a key priority for the Department of Housing, Local Government and Heritage. It was noted in the 2013 Homelessness Policy Statement that “the ongoing extent of homelessness in Ireland must be quantified with confidence so that realistic and practical solutions can be brought forward”.

While it also noted,

“Any response to homelessness or housing exclusion needs to be informed by accurate data. The Department is continuously looking to ensure we are capturing the most insightful and accurate data possible. ...the Department will continue to enhance our understanding homelessness via upgraded data collection”.

The monthly homelessness statistics provided by the Department of Housing and gathered by local authorities are considered by all stakeholders interviewed to provide a vitally important and regular measure of homelessness in Ireland, a way to plan service delivery, to assess effectiveness of services and policy, to hold Government to account by civil society, and should be maintained. There is a consensus that they provide reliable, if somewhat limited data, and that the DHPLGH are accountable to wider civil society through this mechanism.

Despite being a narrow measure, the monthly reports provide consistent data which can provide a comprehensive picture of that aspect of homelessness from the period of 2014 up to the present.

Research participant's views on Ireland's monthly homelessness statistics

- *its a transparent a trustworthy tool that people can see, where the data is coming from.... as a performance toolwe can objectively measure things*
- *within quite a narrow definition of homelessness I think Ireland has amongst the best data in the world, so every month, we're able to have this detailed knowledge ..over a considerable period of time and comparable data..*
- *These monthly statistics are a good source of data on roofless households... They are an up to date and timely summary of a very specific group of users.*
- *The monthly statistics are a strong, clear and precise measure of those in emergency accommodation and are reliably reported every month. They also give some demographic information, for example, gender and now adults and children.*

- *Monthly homelessness statistics have become a kind of a pivot, a weathervane on assessing the effectiveness or otherwise of policy and practice responses. ..it's a serious point of interaction between advocates and the sector as well as service providers.*

3.2 Ireland's commitments under the Lisbon Declaration

In 2021, Ireland signed the Lisbon Declaration on the European Platform on Combatting Homelessness. The Declaration commits EU member states to work towards ending homelessness by 2030. The Declaration also states that “addressing homelessness requires an understanding of how different groups in communities are impacted, including children, youth, women, single parents and large families, older persons, migrants, ethnic minorities and other vulnerable groups”. The Declaration further states that “reliable data collection on homelessness is important”, as is, “the involvement of relevant stakeholders, allowing common understanding, systematic comparison and monitoring at EU level” (EU, 2021: 3).

Further, as part of the commitment to end homelessness by 2030, the key aspects of this Lisbon commitment include:

- No one sleeps rough for lack of accessible, safe and appropriate emergency accommodation.
- No one lives in emergency or transitional accommodation longer than is required for successful move on to a permanent housing solution.
- No one is discharged from any institution (e.g., prison, hospital, care facility) without an offer of appropriate housing.

- Evictions should be prevented whenever possible and no one is evicted without assistance for an appropriate housing solution, when needed.
- No one is discriminated against due to their homelessness status.

The signing of the Declaration was accompanied by the establishment of the European Platform on Combatting Homelessness (EPOCH). The EPOCH is part of a commitment under the European Pillar of Social Rights Action Plan. The platform includes commitments for the European Commission to support the monitoring of homelessness and strengthen analytical work and data collection in order to promote evidence-based policies and initiatives addressing homelessness. It commits to a common monitoring framework on homelessness, including how these metrics will be defined and measured. It is understood this framework will be informed by the ETHOS typology of homelessness. Ireland is committed to EPOCH. Through Housing for All, Ireland enshrined the goals of the Lisbon Declaration in national policy. The Department of Housing outlined to this research, that Ireland believes “it is important that there is a standardised, European-wide definition of homelessness” and stated that future data collection undertaken in Ireland will be guided by their collaborative work with EPOCH. The Department of Housing further stated to this research that the Lisbon Declaration “is now an important national strategic goal. In signing the Declaration, Ireland agreed to promote the prevention of homelessness, access to permanent housing and the provision of enabling support services to those who are homeless”.

3.3 Irish Housing policy has a narrow definition of homelessness

Housing For All (Government of Ireland, 2021), the Government’s national housing policy, despite including a commitment to the Lisbon Declaration has a narrow conceptualisation and definition of homelessness limited to those in emergency accommodation and rough sleeping.

Housing For All states that those experiencing homelessness are “moving from one emergency accommodation to another or, at worst, rough sleeping on our city streets.”

Housing for All further states “the Government is committed to a housing-led approach as the primary response to all forms of homelessness. It includes the prevention of loss of existing housing. It also incorporates the provision of adequate support to people in their homes according to their needs.” This is a recognition that homelessness prevention includes supporting those at risk of homelessness, still living in their homes (not yet homeless). Yet this commitment is not matched by a strategy of including such people at risk of homelessness in its conceptualisation and definition of homelessness, nor in systematically gathering data, and measuring and monitoring such groups at clear risk of homelessness (living in housing exclusion).

Furthermore, the latest homelessness policy strategy for youth, Housing for All Youth Homelessness Strategy 2023-2025 aimed at young people aged 18-24 does not make any reference to the issues of hidden homelessness (an issue identified as disproportionately affecting young people), the need to provide more accurate data, the implementation of ETHOS, or the downsides of the reliance on a restricted definition of homelessness as just being those in emergency accommodation.

It is important to note that the Homeless Agency (replaced by the Dublin Region Homeless Executive in 2011), included ETHOS as a foundational element to its policy and implementation plan on homelessness, Pathway to Home. Stating that, “ETHOS has been adopted by the Homeless Agency as a way of understanding the continuum of housing need that helps ‘ensure awareness of groups that may be at serious risk of homelessness’ and in order to help us better understand housing exclusion as a dynamic that can lead to homelessness” (Homeless Agency, 2009, 23). The DRHE used ETHOS in its action plans and service responses in Dublin (including for Domestic Violence) up to end of 2016. After this, there was a shift in emphasis in policy terms.

3.4 Need for better understanding amongst public of range of homelessness experiences

There is a need for a better understanding of the range of experiences within homelessness amongst the public, in order to also influence policy responses. There is a concern among some homelessness NGOs that homelessness is currently conceptualised and understood in the public mind as rough sleeping. They highlight that media coverage includes “virtually all of the images about homelessness” with people who are rough sleeping. Yet the numbers in the monthly figures do not include rough sleepers and in actual fact when the monthly figures show there are, for example, 1804 families homeless, they are not sleeping on the street, they are in emergency accommodation. So, for homeless NGOs,

“a wider conception of homelessness, which recognizes serious overcrowding, domestic violence refuges, and particularly for young people, precarious sofa surfing and things like that, will give us a much wider understanding of the relationship between the housing system and homelessness. At the moment, the concentration on rough sleeping and back end of it leads to an association of homelessness with mental health and drug addiction, rather than housing, in terms of public perceptions”

(Interviewee Homelessness NGO)

For, example in relation to housing insecurity, a Homelessness NGO policy expert outlined that:

“forms of housing precarity are really important to understand. Because an awful lot of people are in those circumstances. And we need to understand them for two reasons; one, because they’re bad in themselves, and you want to understand them, and therefore be able to respond to them. And secondly, because they’re in a sense their precursors to homelessness in many cases. So, I think there’s a very strong case for having a much broader view of what homelessness and housing precarity are and measuring it”

(Interviewee Homelessness NGO).

3.5 The scale of homelessness is significantly higher than monthly reports of those in emergency accommodation.

Using the ETHOS framework, we can see that Ireland’s monthly homelessness statistics are missing specific cohorts or aspects of HHE. Most notably they do not cover rough sleeping, hidden homelessness, those in long-term supported accommodation, families in domestic violence refuges, those in Direct Provision with status to remain, Travellers in substandard accommodation, or those in emergency accommodation which is not funded by the State under Section 10, or as discussed above those residing in institutions, including hospitals, who have no accommodation in which to reside upon discharge.

The Department of Housing argues that they do not include such groups in our homelessness figures because these are the responsibility of other Departments, and including them in homelessness figures would conflate these cohorts and “risks undermining the strategies to address their problems”.

It is unclear how this would be the case by including such groups in a broader measure of homelessness.

The quarterly homelessness reports provide more detailed data on homelessness. However, their presentation by the Department of Housing lacks analysis and a clear overview of key data. There should also, therefore, be a greater focus on the quarterly reports and the numbers going in, and out of homelessness -which is a measurement of the overall number of people experiencing the trauma of homelessness, and the duration for which they are experiencing it. For example, rough sleeping figures are not included in the monthly homelessness statistics but are included in the local authority homeless Quarterly Performance reports. A consistent and institutionalised rough sleeping count occurs only in Dublin and is carried out by NGOs in the homelessness sector with additional planning and assistance from the Gardaí and staff in the four Dublin Local Authorities. This collaborative approach is similar to other city-wide counts (Drilling et al, 2020). The outreach teams are led by Dublin Simon Outreach team on behalf of the DRHE. The count is carried out biannually. The rough sleeping figures are checked to see how many have a PASS number and are thus registered as homeless with the Central Placement Service (CPS). In the spring count “125 individuals were found rough sleeping of which 110 had PASS IDs”. 44 of those had availed of emergency accommodation that same week of the count (DHPLGH, 2021: 15). In the 2016 Homeless Census estimates were available outside of Dublin to account for rough sleeping in the rest of the country. This estimate was garnered for the CSO with the assistance of local Gardaí and/or local homeless agencies (2016). Outside of Dublin some of the other nine regions provide figures in the Quarterly Performance reports whilst other regions do not (DHPLGH, 2021). This constitutes a gap in the

data. For example, the Southeast and South West regions recorded a significant number of rough sleepers 93 and 72 respectively and the Mid-West region reported 13 rough sleepers in Q1 of 2021 (DPH LG, 2021) (O’Sullivan et al, 2021). In ETHOS rough sleepers would comprise operational category 1. See Figure 2. It is a lacuna that rough sleepers are not included in monthly homelessness statistics.

There is a need for greater focus on the data available in the quarterly reports to show the scale of people experiencing home loss. But also, the numbers exiting homelessness (policy and service effort and effectiveness). The monthly numbers in emergency accommodation are just at one point time and do not show the scale of people experiencing emergency accommodation over time, nor do they show the changing nature of presentations, which can indicate what is happening in terms of the creation of new homelessness. The monthly figures do not show how many people experienced homelessness over the previous 6 months, year, or two years. In particular, they do not show how many children are experiencing long and damaging lengths of time living in homelessness – in emergency accommodation.

More people are experiencing homelessness than the monthly figures suggest. A longer-term perspective was set out in Focus on Homelessness (O’Sullivan, Reidy and Allen, 2021). Drawing on a range of data sources they showed the underlying dynamics of households moving in and out of Emergency Accommodation. They found that while the number of adults who were homeless over the period of 2014 to 2021 never went above 7,000 in any given month, a total of 38,000 unique adults experienced a period of homelessness in Emergency Accommodation over the period. Nearly 22,500 adults exited Emergency Accommodation to either a social housing tenancy or support between Q1 2014 and Q1 2021. The number of adults in Emergency Accommodation for a period of longer than six months increased from under 1,000 in Q1 2014 to over 4,000 by Q4 2020 but dropped to just under 3,500 in Q1 2022 (O Sullivan et al, 2021).

As one research participant highlighted,

“the quarterly performance reports give you detailed information on prevention, the numbers who are exiting, an even much more much better profile of what’s happening... if you think of homelessness as actually 38,000 unique adult individuals had a spell of time in emergency accommodation between 2014 at the end of 2020. Then that tells me homelessness is very different than the stereotypical picture... This is a huge number of people who’ve had a spell but also the majority have exited which is this kind of dynamic flow of homelessness. So, the majority of people who came in have exited. The Monthly figures are useful to a point but they’re profoundly misleading”

(Interviewee policy/academic)

A statutory practitioner in homelessness services stated on this point also that;

“this is important for people to understand that homelessness isn’t like a forever state. And I think it’s really important that people understand homelessness is something that the vast majority of people work through and get out the other side , you know, and so I do think that the flow data is important for that reason. I think people are probably are surprised by the number of people who come through homeless services and exit again”

(Interviewee State practitioner)

This analysis does show that homelessness is in, most cases, a temporary experience, but this should not take away from the traumatic impact of house loss and homelessness being experienced by these tens of thousands of people who have to live in emergency homeless accommodation for some period of time, particularly children and young people.



4.

Hidden Homelessness 1:
People experiencing homelessness
under ETHOS classification but not
counted in current homelessness
statistics



4. Hidden Homelessness

1: People experiencing homelessness under ETHOS classification but not counted in current homelessness statistics

The following sections provide greater detail on our findings in relation to specific groups who are in hidden homelessness – who are homeless under ETHOS categorisations but are not included in current Irish homelessness statistics.

4.1 Domestic Violence Refuges and Shelters

Domestic abuse is the leading cause of homelessness for women and children in Ireland. One in four homeless women cite partner violence as the major contributor to their homelessness. However, although an association between homelessness and domestic violence (DV) has become increasingly clear, policy and service responses to homelessness and domestic violence in Ireland and other European countries have remained largely or wholly distinct (Safe Ireland, 2022).

Women and children coming from domestic violence situations who are staying in refuges or women's shelters were previously counted as homeless and enumerated by PASS, however, from 1st January 2015 onwards, funding for these services were transferred from the Department of Housing, Planning, Community and Local Government to the Child & Family Agency (TUSLA) (DHPCLG, 2017) (DRHE, 2016). Those staying in such refuges were then removed from the monthly homelessness figures. The Homelessness Oversight Group recommended a “discrete funding stream” and “separate reporting” system for domestic

violence-based refuges and shelters (2013: 23). Ireland's national policy obligations in this area include the *Third National Strategy on Domestic, Sexual and Gender-based Violence 2022 – 2026* and also our international policy obligations such as the *EU Victims Directive and Istanbul Convention (Council of Europe Convention on preventing and combating violence against women and domestic violence)* (DJE, 2016) (Flanagan, 2016). TUSLA was tasked with developing a “national structure” for Domestic, Sexual and Violence Based Services (DSVBS) and “coherent and consistent approaches to data around services for victims” (Flanagan, 2016: 2). The issue with collecting data from DSVBS was that they were independent services with no standardized approaches to collecting data across services. Also, TUSLA was looking for data concerning other aspects of DSVBS, including outreach or counselling services as opposed to solely numbers accommodated in refuges. TUSLA never developed a counterpart to the PASS administrative system used for homeless emergency accommodation.

In 2019, data shows that 1,134 women and 2,918 children had been accommodated in domestic violence refuges. The average duration of stays was 34 days, with 40% of stays lasting between 3-6 weeks and 80% of stays less than six weeks duration” with a relatively small number, 2%, staying six months (TUSLA, 2022). This cohort, namely those accessing refuges would correspond to operational category 4 of ETHOS. See Figure 2.

Families fleeing domestic violence have to try access traditional homelessness services as sometimes they cannot be accommodated in overcrowded refuges (Mayock & Neary, 2021). This poses practical problems from a data perspective for crosschecking and capturing the extent of the issue across Government departments.

According to Baptista et al, there is “potential undercounting” of the extent of family homelessness within specific European states and across Europe more generally. This is due to the fact that some European countries like Ireland don’t include DV figures in homelessness statistics, whereas other countries such as Denmark and Sweden include those figures and categorise it as family homelessness (2017: 8).

“Women at risk of domestic violence, who have dependent children with them, and who use domestic violence services such as refuges may not be recorded as being homeless in some countries. This leads to potential undercounting of family homelessness, both within specific member states and across Europe as a whole”

(Baptista et al, 2017)

The need for accurate data collection to inform evidence-based policy is crucial. A TUSLA (2022) review into the provision of domestic violence-based refuges acknowledges inadequate provision. Ireland is not meeting its obligations under the Istanbul Convention for one family place for every 10,000 of population, which means Ireland needs 500 family refuge places. At the start of the Covid-19 pandemic, there were 155 units of emergency domestic violence accommodation operational in Ireland (TUSLA, 2022: 8). This lack of suitable places is exacerbated by the housing crisis meaning

some people in domestic violence refuges can’t find suitable accommodation to move on to. Similar to other areas such as Direct Provision outlined below, housing policy failures leading to the lack of social and affordable housing are responsible for those ready to transition to housing being stuck in the system. They are therefore clearly in a situation of homelessness. This has wider impacts as it means less spaces in refuges available for people seeking to leave domestic abuse (Safe Ireland, 2016). In 2019 there were “4,381” enquiries about the availability of a refuge place which did not subsequently result in accessing a refuge place, two thirds of these because of a lack of available or suitable places. This demand represents only the visible aspect of need i.e., women who have sought help either directly from a domestic violence support service or through a referring professional or service.

Using the 155 refuge spaces, at an average of 2.6 children per mother, gives a figure of 558 individuals in domestic violence refuges, under the ETHOS classification of homelessness. However, the real need based on unanswered requests for refuge spaces and meeting the Istanbul Convention, gives an estimated need of 500 refuge units, equating to 1,300 women and children who are either in refuges or hidden homeless, and should be classed as homeless under ETHOS.

An NGO working in the area of domestic violence explained in this research that from their perspective, there needs to be greater inclusion of those experiencing domestic abuse within homelessness data measurement. They stated that:



“those experiencing abuse are invisible when it comes to publicly available data on homelessness...those who are homeless, those in refuge accommodation or in supported housing, or a number of different housing solutions, are not captured at all. They don’t form part of the monthly, quarterly or annual stats”

(Interviewee Domestic Violence NGO)

They highlight that domestic violence is one of the leading causes of homelessness for families. So,

“if they’re not being counted, you really don’t have an accurate reflection of what is the true extent of homelessness in Ireland, and further still, the housing instability that there is in the context of domestic violence”

(Interviewee Domestic Violence NGO)

Under the 1988 Act definition, individuals and families who are victims of domestic abuse and present as homeless, should be classified as homeless as they can’t as the legislation states, “reasonably occupy or remain in occupation of” their current home.

NGOs working in DV stated that in the past when they were under the Department of Housing’s responsibility, local authorities “were a bit more involved” in responding to DV issues, but since the transfer to TUSLA, its harder to get local authorities to respond to some domestic violence victims as homeless. They pointed out to this research that now, “domestic violence services are sometimes reliant on personal relationships with somebody in a local authority who understands the issues around DV and who is willing to interpret the very loose and ambiguous guidance”. This, the NGO stated, “is not good enough by any stretch of the imagination. And some local authorities are wonderful and some of them are less so”.

A different community law NGO that provides legal advice, highlighted cases they had dealt with of domestic abuse leading to homelessness, but then in some cases the family affected was not being classed by the local authority as homeless because they had legal status issues. They noted that in the past they had more success with local authorities granting exceptional accommodation in such instances.



“if someone was clearly homeless but had a status issue they might get night to night (accommodation) ... We found recently we’re getting nowhere with that. We’ve had two cases in the last month or two, both who were victims of domestic violence leaving Refuges but both of them had legal status issues and in both cases we could not get the councils to agree to give them accommodation and it ended up having to be resolved by resolving their immigration situation, which they were lucky it got resolved for them in time for them to end up being housed before they became homeless”

(Interview-Community Law NGO).

“With the housing crisis comes people’s inability to move from a refuge, which creates an actual bottleneck in refuges as well, which if we track back far enough, prevents people coming into a refuge....because we know anecdotally that some people are not coming to refuges because of their almost foregone conclusion of not being able to move out of it and not being able to get housing moving forward”

(Interview-NGO Domestic Abuse)

The NGO working in domestic abuse raised the issue of the responsibility and role of local authority staff, who might not have little if any training in homelessness or domestic abuse, making decisions based on the 1988 Housing Act, on whether someone who is a victim of DV is homeless or not;

They are also seeing situations where people experiencing domestic abuse are not leaving the home where it is taking place because they know the refuges are full.



“It’s not any reflection on those in local authorities. They didn’t go for a job and go well now I must study up on the issue of domestic violence. They probably know what most people know about this issue, which often times is not accurate or enough. Its limited. And they’re limited, unfortunately, with the use of the physical incident model which leads to measuring

the impact and risk purely on the presence of physical abuse, 'show me a bruise'. And there can also be a tendency to direct... "OK go and get a court order instead". If it was framed through the lens of coercive control, they'd understand that the majority of the impact is underneath the surface. And that it's actually not safe for many people to raise their head above the parapet to seek an order. And even if it they do get an order it can be completely ineffective in some instances because there are those, and we have come across them, that don't care who issues an order. They don't and you know in terms of assessing risk, those living with this, you know, they're the experts of their own experience, but unfortunately it doesn't fit in the box. And people who haven't had the opportunity to unpack this issue and understand it, can only do boxes"

(Interviewee Domestic Violence NGO)

This is a very significant issue for victims of domestic abuse in terms of the stress and compounding of trauma in presenting as homeless and having to 'prove' to a local authority that they are homeless.

There is also a reported reluctance on the part of mothers who are DV victims to present as homeless because of concerns in bringing children into emergency accommodation and adding additional trauma on top of fleeing their home and what children have experienced already.

Such families are part of the 'hidden homeless' and are not measured. As the NGO working in DV points out:

"it's absolutely rife...hidden homelessness. Homelessness is there and is a big part of the domestic abuse experience.... People would come into us. They have spent a number of days, weeks, with family, friends, in their cars, in various other refuges, perhaps in other homeless services in a B&B and the like. Even if we look at B&Bs, that's why the FEANTSA ETHOS approach really spoke to me as well. Some local authority people would say "they're not homeless, they're in a B&B, so they're not homeless". But that's not a home. That's a stop gap"

(Interviewee Domestic Violence NGO)

ETHOS gives a "broader lens" to understand domestic violence as a form of homelessness. This is important because both domestic violence and homelessness are traumatic experiences, which both together compound trauma. As the NGO working in DV explains,

“because we do know that the trauma of this is horrendous. Add the trauma of homelessness and everything that that brings. And I know there’s a good bit of research being done on that, particularly with a focus on children and the longer-term outcomes are pretty awful. So, even in the world of homelessness, it’s only scratched the surface and quite a lot of it is about this issue because even if it is, where somebody finds themselves in homeless services because of a landlord’s decision. I mean that’s traumatic, without adding the multiple traumas of an ongoing and threatening experience that is their life that has deep enduring impacts. Like when we think about children, and we know a bit more about adults but we’re only beginning to know more about children, but, education, health, mental health and physical as well as peer relationships as well as their own relationships into the future, it’s all affected”

(Interviewee Domestic Violence NGO)

“I’m very struck by the blame that goes with the issue. ...the judgment that goes with that. If someone needs to move, if that’s not understood why they need to move and to make that happen, and they are likely going to find themselves in a refuge or a homeless service. Or worse, they’re dead. I mean, I think when we know better, we do better. At the moment all the onus is on the victim to try and navigate this and achieve it, explain it and explain it over and over and convince you, rather than the supports being there understanding ready to work”

(Interviewee Domestic Violence NGO)

The NGO also highlight how we conceptualise, and measure homelessness is linked with stigmatisation and blame and prejudice. They said,



And their view is that measuring victims of domestic violence in homelessness with the homelessness figures would be a spur for the state to act better:

“counting is great leverage for action, so you know if I want to ignore something, I don’t count it....it can be a lack of understanding around the complexity of it and how it manifests, ...a lack of a standardized approach around it. So again, we’re relying on relationships goodwill and peoples’ appetite for understanding it, and so you know that’s not good enough”

(Interviewee Domestic Violence NGO)

If the state did adopt ETHOS, and included people in DV refuges and housing insecurity and potential homelessness, then DV supports would be improved in the view of the NGO, “everything else would flow, if they positioned the women and children I was working with as homeless then it would follow that they would be entitled to the support.”

4.2 People in Institutions

As mentioned above, Ireland’s current legislative definition of homelessness enshrined in the *Housing Act 1988*, covers those “living in a hospital, county home, night shelter or other such institution” who are unable to provide accommodation from their own resources. (GOI, 1998). However, those in hospital, prison, in state care, or various other institutions who are at-risk of homelessness upon release are not measured in official homelessness statistics. The Lisbon Declaration on Combatting Homelessness which the Irish Government

has signed up to also commits Governments to ensure that “no one is discharged from any institution (e.g., prison, hospital, care facility) without an offer of appropriate housing (2021: 4). A performance report by the HSE covering October to December 2020 listed 21 cases of delayed transfer from hospital due to “Housing/ Homelessness” causes (2020: 53). Those counted were experiencing HHE corresponding to operational category 6 (living situation 6.2) of ETHOS.

The problem of discharge of people with no fixed abode from psychiatric institutions is significant. Focus Ireland (2021) site that HSE Mental Health Services in Dublin North City and County (DNCC) showed a large number of DNCC service users (n=385) had a housing need which included people who are homeless (n=145), people living in the family home where it was no longer appropriate (n=112). Across the country, audits have consistently displayed that discharge is frequently delayed due to lack of appropriate accommodation, which includes independent accommodation or a six-month secure homeless bed.

There are various other institutions which figures are not provided for such as people in residential treatment services, prisoners due for release and at risk of homelessness, young people in the care of the state and due to leave when they turn 18 (or age out of supports) are another group that are in state ‘institutions’ but are not counted as homeless.

4.3 Prison and Homelessness

The prison population are another cohort whose relationship with homelessness, both before committal and upon release is complex and documented. For example, homelessness itself has been found to lead to circumstances which increase the likelihood of imprisonment. Conversely as McCann (2003) and Hickey (2002) have noted, housing and the risk of potentially becoming homeless has been a serious issue for prisoners.

McCann noted that homelessness “is found to be both a cause and a consequence of imprisonment, with some offenders identifying their homeless status as a cause of their criminal activity and subsequent incarceration, while others become homeless as a consequence of their imprisonment” (McCann, 2003: 12). The Irish Prison Service Annual Report in 2020 showed that 7.1% of all those committed to prison in 2020 had no fixed abode and were thus homeless (IPS, 2020: 36). Another study in 2018 showed 17.4 % were homeless upon being committed to prison. The study also found that the “prevalence of homelessness in committal to Irish prisons is higher than some international estimates” (Gulati et al, 2019: 35). The number of prison committals where the prisoner declared themselves to be homeless (or of no fixed abode) was 505 in 2019 (444 males and 61 females) (Focus Ireland, 2021).

The total of sentenced prisoners who presented for emergency homeless service provision on their day of release, from March to December 2020 was 224. In 2021 it was 249 and in the first six months of 2022 it was 113 (Houses of Oireachtas, 2022). The Irish Prison Service recognises this issue and are committed to working with Housing Authorities to improve case management of offenders at risk of homelessness on release (IPS, 2020: 48). There is also the “Criminal Justice Housing First Project”, a partnership initiative between the Irish Prison Service, the Probation Service and the Dublin Region Homeless Executive to address homelessness for offenders commenced, October 2020” (IPS, 2020: 57). There is clear evidence that a cohort of prisoners are at high risk of homelessness on release, yet they are not measured nor counted within Irish homelessness statistics.

4.4 Those in care/care leavers and youth homelessness

Children in the care of the state who turn 18 (or later if entering education) are at risk of homelessness. After leaving care, and if they are living in housing insecurity, care leavers are at higher risk of homelessness. Care leavers

experiencing homelessness compounds the ontological insecurity and trauma of the experience (abuse, neglect, parental loss etc) that resulted in them entering care of the state.

It is not just homelessness or housing insecurity affecting those leaving care, but the longer-term risk in the months and years after leaving care—with the reduced likelihood of having a parental home to fall back on. Care leavers are, therefore at a heightened state of potential housing insecurity and homelessness.

The lack of housing options for care leavers means some young people leaving care of the Irish state directly enter into homelessness. However, this is not captured fully in official data.

Mayock and Parker (2020) found care leavers experiencing hidden homelessness such as constantly moving between temporary emergency accommodation, bedsits and the homes of friends or family members.

Those leaving care come out of step-down and semi-independent residential aftercare services, sometimes with no ‘move on’ accommodation in place at the time of their departure. They then enter into prolonged situations of ‘hidden’ homelessness such as staying in overcrowded conditions.

National policy must recognize the central importance of each young person having a home, and the specific needs, and state obligations arising from being ‘in loco parentis’, to ensure access to secure, affordable, suitable housing as a human right to all those leaving care.

TUSLA identified in 2017 an accommodation need for 205 units for care leavers at risk of homelessness.

No young person should leave care unless and until they have appropriate, secure and affordable accommodation.

In relation to the wider issue of youth homelessness, the FEANTSA definition of homelessness states: “Youth homelessness occurs where an individual between the ages of 13 and 26 is experiencing rooflessness or houselessness or is living in insecure or inadequate housing without a parent, family member or other legal guardian.”

It is widely acknowledged within the sector that the true figure of youth homelessness is much higher than the monthly homelessness figures, because there are no youth-specific emergency accommodation services, and many young people are afraid to access adult homeless services (therefore they are not captured in the data).

4.5 Adults and families in “own door” short term accommodation

The reclassification of homelessness figures in 2018 and 2019 damaged the legitimacy of Irish official homelessness statistics. The way in which this was done by the Department of Housing reduced the trust of wider civil society in homelessness statistics. Civil society participants interviewed pointed to a ‘harm’ done to the legitimacy of the statistics resulting from the redefinition of homelessness figures in 2018 and 2019, leading to a decline in trust in the figures. This points to the danger in changing methods of measurement of homelessness without consultation with relevant stakeholders including NGOs and policy experts. A criticism was presented that the homelessness statistics have become politicised – with the Department, local authorities and Government developing ways to artificially reduce the numbers in order to reduce media and public criticism rather than to present the truthful reality of the numbers in homelessness.

“I think in terms of the weaknesses of the monthly homelessness figures there are gaping holes that cannot be ignored anymore... Anybody who’s looking at this with any sort of critical eye, knows that it’s not counting half of what it should be”

(Interviewee Policy/academic)

The most notable and controversial recategorization of the monthly homeless figures occurred in 2018. Adults or families who were housed by local authorities in leased short-term “own door” accommodation, funded under section 10 were removed from the monthly homelessness figures as they were not deemed to be in emergency accommodation (Daly, 2019) (O’Sullivan 2018). Despite still not having had their social housing need met. Focus Ireland strongly argued that this was a redefinition rather than a recategorization as emergency accommodation is “essentially understood as accommodation funded under Section 10 of the Housing Act and recorded on PASS the national database” (2018: 1). Just because the accommodation was of a higher standard did not mean it should be recategorized or more appropriately “redefined” as not being in homelessness (ibid: 4).



Overall, 625 adults with 981 accompanying child dependents were excluded from the Monthly Reports (O’Sullivan, 2018). So, altogether over 3 monthly counts a total of 1606 people were removed from the official published monthly figures (Focus Ireland, 2018). Former Housing Minister, Eoghan Murphy, in 2018 described the removal as resulting from “significant mis-categorisations...which have overstated the total number of people in emergency accommodation in the State today. A number of local authorities have erroneously categorised individuals and families living in local authority owned or leased housing stock”. This recategorization created technical confusion and undermined the public’s confidence in the data. Methodologically speaking, it made the data less comparable over time. Moreover, the lack of consultation with the NCCH and the unilateral manner in which the decision was taken raised suspicion that the real motive for the decision was a political one to produce lower figures.

If we took those adults and families in this specific category and applied the ETHOS typology, they would still correspond to operational category 3, living situation 3.2 and 3.3. This type of housing arrangement is still accommodation for the homeless and, indeed, Louth County Council accept these living arrangements as such. To re-establish confidence in the homeless figures Focus Ireland called for “a more central role” for the CSO in the measurement of homelessness statistics (2018: 4).

4.5 Traveller Hidden Homelessness

Travellers are another group where there are gaps in the data and whose levels of hidden homelessness are not captured adequately. Travellers are one of the most at-risk groups facing homelessness and housing exclusion. For example, Travellers represent less than 1 per cent of the Irish population though constituted 9 per cent of the homeless population (Grotti et al, 2018). Travellers can also face discrimination when accessing the private rental sector through HAP (DPHPLG, 2019) (Grotti et al,

2018). The Expert Group acknowledged that accurate data is crucial to develop evidence-based policies, hence the recommendations to improve the HNA methodology (ibid, 2019).

The Summary of Social Housing Assessments 2022 identifies a housing need of 900 households where the specific accommodation requirement is “Household member(s) is a Traveller”.

However, this does not accurately capture the true extent of Traveller homelessness (DHPLG, 2019) (Russel et al, 2021). A report by the Cork & Kerry Regional Traveller Accommodation Working Group (RTAWG) noted the growing number of hidden homeless amongst the Traveller Community where young adults and families are relying on couch-surfing, staying with family in already overcrowded conditions and doubling up on overloaded halting sites and in relatives’ yards, as well as roadside camps, due to the local authorities inability to supply sufficient levels of Traveller Accommodation regionally (RTAWG, 2021). This report also advocates for the State’s definition of homelessness to be aligned with ETHOS and implemented as a conceptual framework for measuring homelessness, noting that ETHOS captures in its categories most of the ways in which Travellers are homeless. The report states that

“the current definition of homelessness provided by the State is not suitable and excludes a large number of those, including Travellers who are homeless, in effect from homelessness supports and structures

(RTAWG, 2021: 7)

“Travellers are just invisible within the homeless crisis in terms of - there’s no ethnic identifier. So, it’s really hard to capture the true level of Traveller homelessness..there’s so many levels and forms of Traveller homelessness in terms of, couch surfing, Travellers living in mobile homes and trailers in the backyards of their families’ houses, living on unauthorized sites. So, it’s really looking at that definition of homelessness in Ireland to ensure that Traveller cultural needs are captured in that, and the invisible hidden homelessness that Travellers experience”

(Interviewee Traveller NGO)

39% of Travellers are living in overcrowding and 24% in housing deprivation (RTAWG, 2021). This is not captured accurately within homelessness and housing exclusion statistics. There are barriers faced by Travellers in presenting and being accepted as homeless by local authorities. The Traveller NGO reported to this research that *“quite regularly we’d be referring people to legal advice around trying to get registered as homeless, when the Council has refused that”*.

From their experience, the current measurement and assessment of individuals as being homeless through local authorities, *“seems to put a blame on the individual and the Traveller Community, in terms of ‘you made yourself homeless’”*. This discrimination and refusal to assess a Traveller as homeless leads to local authorities offering no support to them. Worryingly the NGO representing Travellers highlights that, *“if they’re leaving domestic*

violence or if they’re leaving due to conflict. That is not the individuals’ fault. They’re leaving and trying to protect themselves and their family. And then they’re not afforded the same protection that everybody else would get”.

ETHOS includes in its definition of homelessness people living in temporary and non-conventional structures such as mobile homes, and for Travellers applying this ETHOS measurement in Ireland requires a cultural sensitivity to Travellers, as the Traveller NGO explains,

“there’s two kinds of situations where they (Travellers) may find themselves living in that accommodation. One is out of a very genuine cultural choice and, one is out of necessity, you know where they might be living in a trailer behind their parents’ home, and they would definitely class themselves as in need of accommodation, so it’s making sure that it’s really clearly outlined for the Irish context, what it would mean for Travellers and just making sure there’s lots of consultation around that and the definition”

(Interviewee Traveller NGO)

So therefore, it’s important to include the cultural aspect of nomadism in Traveller culture, and Traveller homelessness,



“It’s about capturing the definition of being nomadic as not being homeless because some Travellers still hold that on as a cultural aspect of our lives, whereas other Travellers are made homeless and are put back on the roadside but they don’t want to be there. So, they would consider themselves as homeless, whereas nomadic families would consider themselves as nomadic. So, it’s important that that distinction is made within the definition”

(Interviewee Traveller NGO).

4.6 Direct Provision

The statistics and demographic profile of those in Direct Provision is collated by the International Protection Accommodation Services (IPAS) which is under the remit of the Department of Children, Equality, Disability, Integration and Youth.

The Department of Integration reported that in August 2023, there were 22,700 people, 4700 of whom were children, in Direct Provision. Of these 7025 were in IPAS accommodation centres, 14372 were in emergency accommodation, 651 in City West, and 130 in temporary tented accommodation.

The *Day Report* (Report of the Advisory Group on the Provision of Support including Accommodation to Persons in the International Protection Process, Government of Ireland, 2020), recommended that those in Direct Provision should be assisted by local authorities to move to own door accommodation within three months of residing in a reception centre.

There are almost 5,000 people in Direct Provision who have been granted refugee status and permission to stay in Ireland but cannot move out due to the lack of access to housing. Peter Tyndall the Ombudsman in a Oireachtas debate stated that “There are large numbers of people within the system who have the right

to remain in Ireland but who are unable to satisfy their housing needs” (Oireachtas, 2019). ETHOS specifically highlights accommodation for immigrants in operational category 5 (living conditions 5.1 and 5.2) as being conceptualised as ‘houseless’. The cohort in Direct Provision who have been granted leave to remain status, represent another area of hidden homelessness that is not captured or reported adequately within Ireland’s homelessness policy and statistics.

4.9 Long Term Supported Accommodation

Another cohort that is not represented in the monthly and quarterly reports are those individuals staying in long-term accommodation (LTA). This cohort were also recategorized by the Central Statistics Office for the 2016 Census. According to the CSO the “rationale behind this decision was that although these long-term residents may require a certain level of support, they are for the most part considered tenants (although some have license arrangements) and therefore should not be included in the homeless population count” (2016). The CSO Census of 2011 concluded that there were “992 person accommodated in Long Term Accommodation on the Census Night (578 male and 414 female)” (2016: 5).

In 2016, there were 1,772 individuals counted in long-term accommodation though they were not categorised as homeless by the CSO in agreement with the Census Homeless Methodology Liaison Group which consulted stakeholders involved in providing homeless services. It is a small, though not insignificant, cohort who are not enumerated in the monthly statistics under our current definition and measurement of homelessness. This cohort are included in ETHOS, under operational category 7, living situation 7.1 and 7.2.

4.10 Emergency Accommodation not Funded by the State

Those who reside in emergency accommodation that is not funded under Section 10 are not counted or included in homelessness figures (Oireachtas, 2019). Examples of this type of accommodation include the Morning Star Hostel and the Regina Coeli. Again, the CSO 2016 homeless census counted this cohort. According to the CSO, more individuals were reported to be homeless on Census night “because the Census 2016 total included individuals in non-state funded homeless accommodation identified by the CSO and agencies/service providers involved in providing support to homeless people” (CSO, 2016: 10). Again, from an evidence-based policy perspective this small cohort should ideally be counted within Ireland’s homelessness statistics. There are in the region of 200 individuals in such accommodation.

4.11 Homelessness within the Summary of Social Housing Assessments (SSHA)

Data in relation to homelessness is also available from the Summary of Social Housing Assessments (SSHA) (Housing Agency, 2022). Individuals or households who are in housing need, apply to local authorities for social housing support. If those individuals and households are deemed by a local authority to qualify and be eligible for social housing support (such as being under the income threshold or in unsuitable or overcrowded living conditions)

they are counted on the Summary of Social Housing Assessment (SSHA), known as the national social housing waiting list.

The SSHA is legislated for under section 21 of the *Housing Miscellaneous Act 2009* which outlines a “Summary of Social Housing Support”. The SSHA brings together information from all local authorities on those in their administrative area that are qualified for social housing support but whose social housing need is not currently being met in order to inform housing policy and plan delivery of the right types of accommodation.

Among the eligibility categories for social housing is a wider definition of homelessness than in the monthly statistics. Regulations require local authorities to determine if a member of the household is homeless, but this includes “living in an institution, emergency accommodation or hostel”. This category of need, and the method used to collect the data, differs from other counts of homelessness. Reasons for differences between the datasets include definitional differences (the SSHA includes rough sleepers and homeless applicants not currently living in emergency accommodation while the DHLGH data includes those who have never engaged with a local authority in relation to social housing support), timing differences (the SSHA count is based on a single annual point in time while the DHLGH count is carried out over a full week), and data entry and IT systems anomalies (Housing Agency, 2022).

In the SSHA, categories of households who are defined as homeless (Homeless, Institution, Emergency Accommodation or Hostel) include, 6,700 households in 2022.

However, in the description of where they are currently living (current tenure) there are 6704 households living in Emergency Accommodation, and a further 5,113 households identified as living in 'other' arrangements, described as "instances such as households with a disability living in congregated settings, those living in supported and transitional housing, foster homes, Direct Provision, mobile home/caravan, or accommodation provided by an employer and households in hospital, prison, addiction recovery centres, rough sleeping or otherwise homeless but not correctly recorded as such." These could be classed under ETHOS as homeless under living conditions 1 to 7.

The SSHA, therefore, gives an indication of the likely wider numbers in homelessness. Combining the SSHA categories of homeless households, gives a figure of 11,817 households living in homelessness identified by the SSHA using the ETHOS definition. This compares to the 7,684 households homeless in monthly statistics (5880 individuals and 1804 families). The SSHA therefore suggests that there are a potential additional 4,129 households who are homeless above the monthly figures, 51% higher than monthly figures. This figure is very close to our estimate of the numbers of people in roofless and houseless situations identified in Figure 2.



5.

**Hidden Homelessness 2:
Exclusion of people presenting as
homeless due to narrow definition of
homeless & lack of emergency
accommodation**



5. Hidden Homelessness 2: Exclusion of people presenting as homeless due to narrow definition of homeless & lack of emergency accommodation

5.1 Local authorities using narrow homeless definition & lack of emergency accommodation to not count those presenting as homeless

There are people in hidden homelessness because local authorities do not count everyone who presents as homeless. They only count those who they classify as being eligible to be homeless under the Housing Act. This excludes some people who are potentially homeless and in homelessness. It is also impacted by the narrow way in which local authorities interpret the Housing Act definition of homelessness, which means some individuals and families who are presenting as homeless are not being counted and included within homelessness data.

Some people presenting as homeless to local authorities but are not deemed as meeting the definition of homeless by the local authority (or being responsible of that particular local authority area) are therefore not counted as homeless. This is reducing our understanding of the true scale of homelessness and the required policy and service responses. The homelessness statistics are not capturing those presenting as homeless, but not deemed as homeless by the local authority. **Therefore, a very significant area of 'hidden homelessness' is the number of people who literally 'present' as homeless at local authorities but are deemed not to be homeless.**

A solicitor working in a community law centre NGO (research participant) highlighted that the current narrow measurement and definition of homelessness “can conceal pressures to the system”, because if people are refused entry to the emergency accommodation system, they are not counted as homeless. Local authorities are reported to be turning away some people who present as homeless, refusing to offer emergency accommodation to them, for eligibility reasons. They are not being accommodated in emergency accommodation, and therefore not counted as homeless. If they are not classed as homeless, they are then not counted as homeless.

“If someone rings up a local authority and says they’re homeless. The local authority will say “where are you staying”? And the person says, well, I’m staying here for the last 3 months. The local authority says, “Well just keep staying there” and “why are you bothering us” kind of thing”

(Interviewee NGO Solicitor)

The housing legal expert explained that “we have so many people that we deal with who are trying to even just be recognised as homeless”. If they are not being recognised as homeless by the local authority, then those people are not included in the homelessness statistics. They explained that “a huge portion of our clients who are clearly homeless from any sense that one would understand it, and are also legally homeless, as far as we are concerned, but they just haven’t been classified as homeless for whatever reason by a council”. They point that, “a lot of the time it will be people who are in the class of hidden homelessness situations of couch surfing or staying with family and friends or squatting or in unsuitable situations”. By keeping those people out of the statistics, the legal expert explained, “you do miss a large part of the picture of who is homeless”.

The 1988 Act gives significant discretion to a local authority to decide if someone is homeless. We highlight here in italics the sections that provide discretion to the local authority. The Act states that “A person shall be regarded by a housing authority as being 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 of, 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 (GOI: 1988)

Local authorities are interpreting the Act to question those presenting as homeless, to refuse support (and therefore counting). A factor behind this is the lack of emergency accommodation, leading to local authorities asking those presenting if their situation is one

where they “can reasonably occupy”, or that the local authority deems they can provide accommodation from their own resources.

The community law NGO solicitor stated that *“that’s the sticking point that we have all the time with people who are sheltering with family and things like that....the element of discretion around that isn’t helpful. If somebody has no legal right to remain where they are, and they are presenting and saying, “well I can’t stay here” and they’ve no legal right to stay there, they should be considered homeless”. For example, they explain, “we might have an adult child that needs to leave the family home for a very genuine reason and they’re being told (by the local authority), ‘well you are not homeless - you can stay there’, but they have no legal right to stay there. And you’re forcing people to stay in situations which might be very damaging to them or might be dangerous for them, by the definition being so narrow”*. So, for this NGO, the element of discretion of a local authority being able to make their own decisions around whether they consider someone to be reasonably accommodated or not “is unhelpful”.

This also then results in inadequate implementation of homelessness preventative measures, because the definition of homelessness is not considered where someone is at risk of imminent homelessness, such as having an eviction order. As one research participant explained, there is a gap between the good practice of local authorities sometimes accepting someone as potentially homeless (facing an eviction, in an institution leaving with nowhere to go to, young person about to leave care, family in a refuge etc) and intervening to try find them accommodation, yet not counting these as homeless or in housing insecurity. Those at severe risk of homelessness or living in insecure housing, should, therefore, at least be counted, to aid prevention services, if even in a different category.



“in terms of people in situations like refuges, institutions, facing eviction, they are practically homeless once they get to near the end of where they are staying. I don’t see why they wouldn’t be counted, if even in a different category”

(Interviewee Community Law Solicitor)

While the Quarterly Progress Reports show presentations of individuals and families and the prevention work being done on this, it does not include those who could not be supported because of lack of emergency accommodation. Neither does it include those who present as homeless but are not deemed as homeless.

As the community law centre solicitor explained,

“all of those people that are not being considered or classified as homeless because the council are refusing to give them emergency accommodation, saying “stay sleeping on your dad’s floor” or “stay sleeping on your friends couch, why do you need to come into the system’... They’re keeping them out of the system”

(Interviewee Community Law Solicitor)

This, they explain, *“presents a very distorted picture to be leaving those people out.”*

And when emergency accommodation is full, those who contact the local authority are sometimes not counted, because they cannot enter emergency accommodation. This gives a distorted and inaccurate picture of the scale of the homelessness crisis.

Cohorts of people who get refused emergency accommodation are in hidden homelessness staying with friends or family or living in a really unsuitable housing situation but are being told by the local authority, according to a research participant, *“you just need to stay put, “you’ve got a roof over your head”, it doesn’t matter if it’s not suitable or you are precarious there, but you have a house so were not going to consider you homeless”*. This is very problematic and is likely to be leaving people in situations of domestic abuse and vulnerability, and at risk of harm. Local authorities should begin measuring and capturing those who contact them for homelessness supports.

5.2 Pressuring traumatised homeless people to not present as homeless is system failure

A research participant explains that this can lead to the more vulnerable being not assessed as homeless as it depends on your capacity to self-advocate and ‘pressure’ to get assessed and accepted as homeless.

“... people would come to me and say I rang up Central Placement Service and I was told... I was asked where I was staying and I said, ‘sleeping on my dad’s floor with my three kids and my husband’ and they (the local authority) said ‘why can’t you just stay there, there’s room for you’. And that’s as far as they get. So, if they have somebody engaging on their behalf and advocating or if they have really high capacity and mental space to actually do it for themselves and push, they might get assessed, but the first line people are getting is just ‘no’

(Interviewee Community Law Solicitor)

That those going through the trauma of homelessness have to pressure the system to accept them as homeless is a system failure. People experiencing homelessness, including hidden homelessness, should be receiving direct supports for their housing situation, not actively discouraged from seeking support by those responsible for providing such support.

This adds to the individualisation of the personal crisis of homelessness and adds to the isolation and vulnerability of those experiencing homelessness. It is, in a sense, a state enacted gaslighting of those who are homeless, with services trying to convince the person that their reality of homelessness is not actually homelessness, and that they should take responsibility themselves to sort it out, not come to the state for support. It is a deeply stigmatising and destructive response as it makes those already isolated even more so and

adds to destructive emotions being experienced of shame and self-blame. This is not just a service level narrative, but also one expressed by the top in the Irish State and Government, who assert that homelessness is mainly caused by individual factors, not structural housing policy failure. Even though the evidence shows this is incorrect.

5.3 Insufficient resources allocated in data collection and analysis

It takes human resources and capacity to gather and analyse data. It was highlighted in the research that local authorities do not have sufficient resources to conduct extra analysis with different methodological approaches. Part of the issue is that policy and practice does not place sufficient emphasis on measuring a wider range of homelessness experiences, in particular measuring hidden homelessness, and therefore does not allocate sufficient resources to homelessness data collection and analysis.

A research participant who had experience as practitioner and policy analyst within a local authority was critical of the current inadequate resourcing and prioritisation of data collection and measurement of homelessness and explained,

“you might think that, given the primacy and the huge challenge and the political emphasis placed on resolving homelessness, that we would build on a lot of what we achieved in the Census and PASS and go further. And now put in a system where you have base registry data in every local authority, which is available to any other party to use so that you can start looking at the employment or income

characteristics of the homeless population, the ethnicity, the gender, family status of the homeless population, the health status and requirements of the homeless population. And that you'd really begin to understand what's happening for people including who these people really are, rather than only keeping a view of them as a person who's currently living in one of the following versions of emergency accommodation, whether it's a Family Hub, private emergency accommodation hostel or one of the few supported temporary accommodation units that still remains, fully funded or whether they're an intermittent rough sleeper. So, you know, it's funny that there's so much time and effort talked about resolving homelessness, and yet there is very little that has been done since about 2016-17 to complete the picture"

(Interviewee State practitioner and policy analyst)

There is data available to various state agencies and local authorities related to housing need that is not published, collated or analysed—for example data held by local authorities on homelessness and overcrowding on housing waiting lists.

The LGMA is developing a centralised system for data collection. It could have a role in analysing and presenting data.

There are figures that are not included currently in Ireland's homelessness statistics, which could capture Ireland's level of hidden homelessness.

It is important to highlight that there are limitations to all data collection and measurement – particularly resulting from the exclusion of marginalised groups. This highlights the need to explore peer led collection of data on homelessness of vulnerable groups. This is important so that there's a much more systemic approach to, not just the enumeration of the extent of homelessness, but also a deeper analytical understanding of the characteristics within any population and what those dynamics of change are and what may be impacting upon them.



6.

Hidden homelessness 3: Hidden within the data: hidden experiences of homelessness (children & families)



6. Hidden homelessness 3: Hidden within the data: hidden experiences of homelessness (children & families)

6.1 Scale of homelessness affecting children hidden from monthly reports

The monthly homelessness statistics present data on the number of children (dependents – under 18) who are in emergency accommodation at a point in time. The latest figures for July 2023 show 3,829 children homeless with their families.



Figure 7 Families recorded in official monthly homelessness statistics August 2023

Region	Total Families	(of which) single parent families	Total Adults	Total child dependants
Dublin	1,347	738	2,302	2,908
Mid-East	87	49	138	160
Midlands	32	19	46	55
Mid-West	90	62	126	149
North-East	38	21	59	70
North-West	15	12	18	35
South-East	33	25	41	45
South-West	96	61	144	195
West	101	58	151	212
TOTAL	1,839	1,045 (57%)	3,025	3,829

Source: Department of Housing

However, there is data in relation to children and families who are homeless which is not presented within the monthly homelessness statistics. While there is some data, as we will show below, available in Quarterly Progress Reports, it is not clear if some data in relation to children in homeless is being collected but is not being presented in official statistics or the data is not available at all. There is an important aspect of the experience of homelessness that is available for Dublin, but not nationally, and we present that here for the first time – the sheer scale of numbers of children experiencing homelessness. Homelessness statistics do not present the overall numbers of children experiencing homelessness (which is a trauma for children) over periods of time, and this represents a significant failure to systematically

measure the number of children with families experiencing the trauma of homelessness.

6.1.1 The number of children entering emergency accommodation in Dublin

The total number of unique children in Dublin who entered emergency accommodation with their families between 2016 to 2023 is 12,804 children with their 6,759 families (Figure 8). Based on this data from Dublin, and national figures, we estimate that at minimum, 17,000 children have experienced homelessness in emergency accommodation in Ireland since 2016¹⁵. That is a truly shocking figure. The national flow data on children experiencing homelessness was not made available by the Department of Housing.

Figure 8 The total number of unique children in Dublin who entered emergency accommodation with their families between 2016 to 2023

	Q1		Q2		Q3		Q4			
Year	Total Families	No. of Children	Total Families	No. of Children	Total Families	No. of Children	Total Families	No. of Children	Families	Child
2016	292	580	210	270	234	470	166	330	902	1650
2017	226	398	224	443	290	609	236	198*	976	1648
2018	293	620	261	539	323	685	235	486	1112	2330
2019	276	532	232	451	329	671	200	386	1037	2040
2020	216	440	98	152	205	356	180	344	699	1292
2021	154	254	219	424	206	418	170	306	749	1402
2022	245	485	213	354	220	432	169	391	847	1662
2023	203	348	234	432					437	780
Total 2016-2023									6,759	12804

* Data available only for the month Oct-17

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Source: Author analysis of DRHE data provided to this research

¹⁵ This estimate is based on the figures from August 2023 which show that children homeless with their families in Dublin represent approximately 75% of all homeless children nationally.

6.2 The scale of hidden homelessness being experienced by children and families- insecure and at risk of homelessness

The data provided on preventions from entering homelessness also give an indication of the scale of housing insecurity and hidden homelessness that exists among families and children. Although, there is no data provided in homelessness statistics on the number of children (dependents) who are accompanying families who are accepted by local authorities as being homeless. While these are referred to as 'presentations', this is misleading as it does not capture all families and children (and individuals) who are presenting as homeless. It does not count those who present as homeless but are not accepted by the local authority as being homeless. We do not have the data, as for example, is measured in Northern Ireland, for the actual numbers of families and children 'presenting' as homeless to local authorities. In most administrative systems, the number of 'presentations' is the number of people who contact a service for support. In the Irish homelessness usage it is only the number who are assessed as being eligible.

Our analysis of the quarterly reports from January 2022 to July 2023 show that nationally in 2022, 2,734 families 'presented' as homeless (accepted as homeless by local authorities).

1,109 (40%) were prevented from entering emergency accommodation (these children with their families have experienced the traumatic 'home-loss', the loss of their home) and 1,625 entered emergency accommodation. For the 22-month period up to September 2023 we find that 4,998 families presented as homeless, and 58% (2,905) new families entered emergency accommodation (see Figure 9). This shows the lifting of the eviction ban has resulted in an increase in homelessness amongst families, as the number of families presenting as homeless increased after the lifting of the eviction ban in March 2023, by 25% in Q2 2023 on Q1 2023, and this was the highest number of families presenting as homeless in any quarter in the previous 18 month period.

Statistics in the Quarterly Reports on the number of families who presented and were classed as eligible as homeless only commenced nationally in 2022 but is available for Dublin from 2020 onwards. Analysis of Quarterly Reports for Dublin shows that in 2020, 1,544 families 'presented' as homeless, 699 entered emergency accommodation and 1221 left. So, while the national monthly homelessness data showed levels of homelessness falling in this period, what this data reveals is that the flow into homelessness – the presentations, remained at a very high level. The factor that was reducing homelessness was the high proportion prevented from entering emergency accommodation and the high number supported to leave.



Figure 9 Homeless family presentations, preventions and exits at a national level January 2022 to July 2023.

Month	Total Families Presenting	Less families prevented from entering emergency accomodation	Net new families entering emergency accomodation	Families leaving emergency accomodation
Q1 2022	729	263	466	205
Q2 2022	658	256	402	244
Q3 2022	708	295	413	221
Q4 2022	639	295	344	274
Q1 2023	669	306	363	215
Q2 2023	833	352	481	207
Q3 2023	762	326	436	239
Total	4,998	2,093	2,905	1,605

While the data shows 4,998 families were made homeless in this period it does not provide figures for the number of children (dependents) that were with them. Based on an estimate of 2.1 children per family (the average number of children per family homeless in emergency accommodation 2022), we estimate that 10,496 children experienced some form of homelessness in the 22-month period of January 2022 to September 2023, and that 5,741 children experienced homelessness in 2022.

That is, they and their families presented as homeless to local authorities in this period and were accepted by the local authority as homeless. We know too, that this is not the complete figure of families and children experiencing homelessness in this period, as it does not include the families who present as homeless but are not accepted as being homeless by the local authorities, nor does

it capture families, who are evicted into homelessness and did not present as homeless - these 'hidden homeless', couch surfing, living in overcrowding with wider families or friends, living in cars, even tents.

Using the figure of 40% being prevented from entering emergency accommodation, we estimate that at minimum, 28,500 children have experienced 'home-loss', being made, or potentially homeless, with their family since 2016, equating to 4,400 a year. These children are enduring traumatic experiences, with resulting emotional and developmental impacts.

These are only limited as they are based on an estimate of those families who presented and were accepted as homeless by local authorities. It does not include families and children in hidden homelessness - those not accepted as homeless or didn't present, as the data on the number of children with families presenting and not accepted at as homeless isn't available.

As one research participant explained, why this is essential and why it is needed is,

“the point is to be able to construct data analytics that are reliable and valid and can be applied into program decision making about whether or not we expand or divest from certain forms of provision in favour of others if we’re reliant on a shelter-based form of provision, to address the crisis of rooflessness we need to know more about the consequences of that over the short to long term. We need to know a lot about those consequences for particular characteristics in the population”.

6.3 The ‘hidden’ experience of increasing length of time families are in homelessness

Our analysis of the Quarterly Progress Reports shows a dramatic increase in the last 12 months in the length of time families and children are being forced to stay in homelessness in emergency accommodation (see Figure 10). We find that nationally, in July 2023, 37% (667) of families were in emergency accommodation for less than 6 months, 1133 (63%) were there longer than 6 months, 40% (711) were there longer than 12 months, while 15% (273) were there longer than two years.

What this shows is that two thirds of children in emergency accommodation (est. 2,380 children) are there longer than six months, 40% (est. 1,493 children) are there for longer than 1 year, while 15% (573 children) are there for longer than two years. That is a period of time that is likely to leave long lasting negative impacts on children, in some instances essentially robbing children of their childhood, and leaving them with life lasting negative impacts.

The number of families in emergency accommodation longer than 6 months grew by 70% from 669 in July 2022 to 1133 in July 2023. The number of families in emergency accommodation for longer than 12 months grew by 80% from 393 in July 2022 to 711 in July 2023. While those there longer than 24 months grew from 180 to 273 by 51%.

These numbers are truly scandalous, and they are in one period of time. There are thousands of children spending extended and damaging periods in emergency homeless accommodation in Ireland, and we don’t properly measure, track, support or respond to their needs, but most significantly we are failing to provide proper policies that prevent any children entering homeless accommodation. The fact that thousands of children are being left in emergency accommodation for periods of multiple months, and even years is a gross violation of human rights of children in Ireland by the Irish state.



Figure 10 Duration of stays by family households in emergency accommodation in Quarter 4 2022 and Quarter 2 2023

Duration of stays by Family Households in Emergency Accomodation as of the last night in the Quarter (30/06/2022)										
Monthly bands	Dublin	Mid East	Mid West	Midland	North East	North West	South East	South West	West	Total
0-6	450	49	56	18	8	12	19	63	38	713
6-12	207	14	11	7	1	1	3	14	18	276
12-18	100	4	5	2	0	0	2	2	13	128
18-24	75	4	0	0	0	0	0	0	6	85
24+	146	4	2	0	0	0	2	0	26	180
Totals	978	75	74	27	9	13	26	79	101	1382

Duration of stays by Family Households in Emergency Accomodation as of the last night in the Quarter (30/06/2023)										
Monthly bands	Dublin	Mid East	Mid West	Midland	North East	North West	South East	South West	West	Total
0-6	420	49	45	5	11	8	29	62	38	667
6-12	301	25	21	21	10	3	1	27	13	422
12-18	225	10	14	5	4	3	1	7	11	280
18-24	129	5	3	1	0	0	0	3	17	158
24+	233	2	3	0	1	0	2	2	30	273
Totals	1308	91	86	32	26	14	33	101	109	1800

It is important to note that our figures on children above are estimates, as statistics on the length of stay in emergency accommodation does not include data specifically for children - it is just available for families. Figure 10 shows the duration of stay in emergency accommodation for families, but dependents are not included. There is clearly an urgent requirement to show the duration of stay of children in emergency accommodation, given its traumatic and long-lasting impacts on children.

6.4 Families and children type of accommodation is hidden from the data

The monthly homelessness data provides detail on the type of accommodation individuals are in (private, private supported etc), however, such data is not provided for families on a national basis. This is vital information to understand what is the nature of the type of accommodation for families, given as outlined earlier, the impact of different types

of homelessness accommodation on families (e.g. hotels, B&Bs, family hubs etc) and whether they have supports or not (Hearne and Murphy, 2018).

The data is available for Dublin – provided by the DRHE. As outlined in Figure 11, it shows that there are 383 families and 811 children in hotels and B&Bs, an increase on the 114 families in commercial hotel accommodation in 2021. It is seven years since the commitment of the Fine Gael Minister for Housing Simon Coveney to end the use of such accommodation for families given its damaging impacts. The first Family Hub opened in Dublin in late 2016, and by 2021, there were 29 facilities across the country designated as Family Hubs, the majority of them (20) in Dublin. Some are converted hotels and vary in size from 4 to 100 beds. There are now 577 families and their accompanying 1,129 children in Family Hubs in Dublin. This data also shows that only half of families in emergency accommodation in Dublin are in supported accommodation.

Figure 11 Breakdown in number of families, and unique children, by type of accommodation in homelessness in Dublin (accommodated by the DRHE) and level of support (July 24th-30th 2023)

Breakdown Accommodation Type	Family	Number of Families	Number of Children
Hotels and B&Bs		383	811
Private Emergency Accommodation (PEA)		298	790
Supported Temporary Accommodation (STA)		83	165
Family Hub Category One (NGO - STA)		254	534
Family Hub Other Category Two (Pvt Operator - STA)		323	595
TEA		6	13
Total		1,347	2,908

6.5 Youth homelessness reclassification

Prior to July 2021, children and young people who were homeless as dependents with their family were included in the 'dependent's category. However, in July 2021, young adults over 18 who are with their families are no longer included in the dependents category but enumerated in the adult category (DHPLG, 2021). There is the potential for this reclassification to be misleading in terms of the number of dependents with families in

homelessness and the numbers in 'youth' homelessness. Some young people enumerated in categories over 18 are not independent youths who are homeless, but young adults homeless with their families. This creates a difficulty in interpreting youth homelessness based on official homelessness statistics.

Figure 11 shows the categorising of age within the monthly homelessness figures. It is not clear what proportion of the 18- to 24-year-olds are independent and how many are dependents (homeless with their family).

Figure 11 Numbers homeless in emergency accommodation by age group

Region	Ages 18-24	Ages 25-44	Ages 45-64	Ages 65+
Dublin	943	2,843	1,459	81
Mid-East	65	199	118	19
Midlands	19	82	28	2
Mid-West	55	211	112	13
North-East	17	61	24	6
North-West	11	55	18	5
South-East	39	148	54	11
South-West	69	329	158	17
West	56	150	98	10
Total	1,274 (17%)	4,078 (54%)	2,069 (27%)	164 (2%)

6.6 Quarterly data on reasons for becoming homeless

As of Q2 2023, local authorities have begun reporting the reasons for presentation cited by households who newly enter emergency accommodation in the most recent quarter. The Q2 2023 data shows that the main reason

cited for becoming homeless was Notice of Termination (eviction in private rental sector), followed by, Relationship breakdown/Family Circumstance and then Overcrowding.

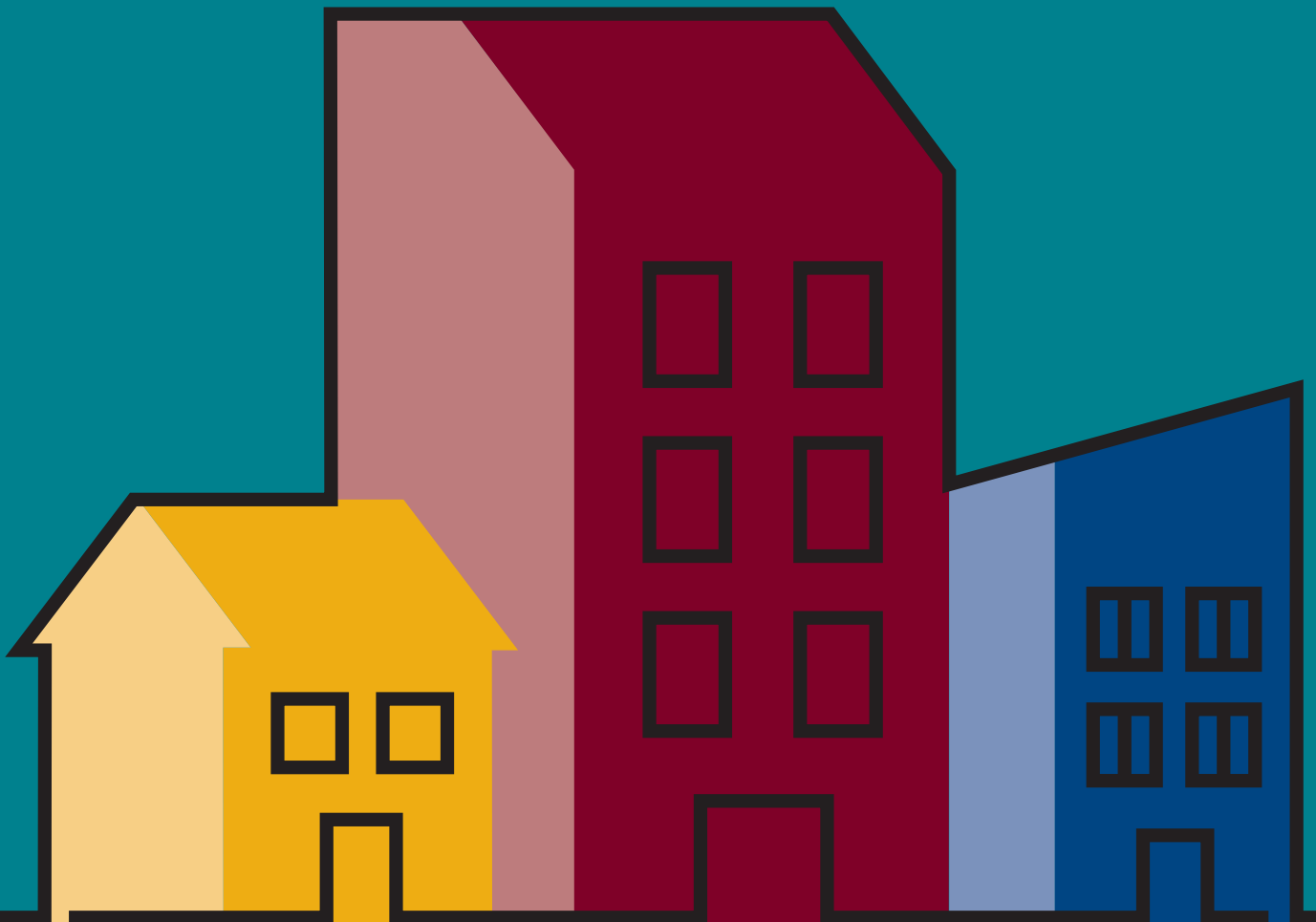
At a Dublin region level, the reasons for presenting as homeless are broken down further as set out in Figure 12.

Figure 12 A breakdown of the primary reason for homelessness recorded for new presenting families in May 2022 in Dublin.

Reasons for Homelessness	May	% of total
NOT	31	48%
Family Breakdown	14	22%
Asked to leave friends - Sofa Surfing	6	9%
Domestic Violence	3	5%
No previous address in Ireland	2	3%
Family re-unification	2	3%
Relationship breakdown	2	3%
Other	2	3%
Victim of anti-social behaviour	1	2%
Leaving Direct Provision	1	2%

7.

Hidden homelessness 4: Housing exclusion (insecure and inadequate)



7. Hidden homelessness 4: Housing exclusion (insecure and inadequate)

7.1 Insecure housing

ETHOS defines people living in insecure accommodation to include those living temporarily with family/friends, no legal sub/tenancy, illegal occupation of land, people living under threat of eviction, and people living under threat of violence.

The scale of hidden homelessness in Ireland was revealed in a population wide sample survey carried out for the Simon Communities in Ireland which found that 190,000 people (5% of the over adult 18 population) had “stayed temporarily with another household, because they don’t have a regular address of their own” i.e. experienced hidden homelessness in the last 12 months.

The SSHA identifies 6661 households, (approx. 17,984 individuals) ‘Living with relatives/friends’, which we classify as ETHOS category 8, ‘people living in insecure accommodation (temporarily with family/friends, no legal sub/tenancy’. While a further 14,752 households are ‘living with parents’.

7.1.1 Generation Stuck at Home

The results of Census 2022, showed that there were 522,486 adults aged 18 years and over who were living with their parents, representing just over 1 in 7 of the adult population (13%). It is a 19% increase since 2011. Over 61% of 20 to 24 year olds lived with their parents (equating to 187,500 people), and 33% of 25 to 29 year olds (97,300), with a further 49,500 30 to 34 year olds living with their parents.

Hearne (2022, 169) describes this ‘Generation Stuck at Home’, “Locked out of buying or renting their own home by the housing crisis, Generation Stuck at Home are living in their

parents’ or relatives’ home. They feel as if they are not real adults, their lives are on hold, their aspirations and dreams slipping away as they desperately try to get a home of their own. For some, if their house is big enough, and their family is small, it might be possible to have the space to develop independently in their own parents’ home, but that is not the case for most”. It can be extremely stressful, with increased tension between parents and children, and between siblings. A survey found that 93 per cent of 21–30-year-olds living at home said they would ‘prefer to be living separately’ from their parents. Three-quarters of female adults living at home with their parents feel they do not have enough privacy. Huge parts of people’s lives are out of their control when they are living at home – how they live, who they live with, having relationships, having children. Adult children feel infantilized. Those living at home feel a huge amount of shame. It has a real impact on their mental health (Hearne, 2022). We do not know how many of this massive group are at risk of homelessness, or living in potential homelessness. It is likely tens of thousands are. Artist Alison Byrne developed a Glass Art Installation; Hidden Homeless: exploring the housing crisis in Ireland. Through an evocative arrangement of 12 small glass houses (see Figure 12), it gives expression to her own and eleven other’s lived experience of hidden homelessness in Ireland. The imagery conveys the feeling of being trapped or confined in a tiny space, often the childhood bedroom. The art describes the impact on mental health, of feeling stagnant, unstable and infantilised, the impact on health and anxiety, living in a state of survival and the guilt of resentment.

Figure 12 Generation Stuck at Home - Art expressing experiences of hidden homelessness: Glass Art Installation by Alison Byrne



Image 1 Confined



Image 2 The guilt of resentment



Image 3 Survival



Image 4 Infantilised



Image 5 Stagnant



Image 6 Health Anxiety

7.1.2 Generation Insecure- private rental

There is a significantly growing cohort of people living in insecure housing in Ireland as a result of the phenomenal increase in households in the private rental sector receiving a no-fault eviction (notice-to-quit). 20,000 notices to quit issued to private rental tenants were registered with the Residential Tenancies Board in the 12 months from Q3 2022 to Q2 2023 (Hearne, 2023). They are living in insecure housing, in a form of potential homelessness.

Within the private rental sector is a large cohort of households living in serious housing insecurity. They are recipients of the Housing Assistance Payment (HAP). Recipients of HAP are eligible for social housing, but rather than receiving traditional council housing or housing from an Approved Housing Body, they are provided with a payment that is supposed to cover their rent. However, many HAP tenants have to pay a 'top-up' on top of the HAP payment to the private landlord. Furthermore, HAP tenants receive HAP because they cannot afford the market rent, if they are evicted (among the 20,000 receiving a NTQ), they are at high risk of homelessness because the HAP limits do not cover the new higher market rents, and they have less income available to cover higher rents. Many of these 60,000 HAP tenant households are living in a form of deeply insecure housing (under ETHOS category 9) and at risk of homelessness, they are in a form of hidden homelessness.

Assuming that a proportion of those 20,000 receiving NTQs are also in receipt of HAP, and from the increase in reports of those receiving NTQs moving into forms hidden homelessness, we are estimating a figure of 1 in 10 HAP tenants living at risk of eviction, which equates to 6,000 households (16,200 individuals). It was reported that 475 households were overholding on their tenancy because of receiving an eviction order and having nowhere to go to (Threshold, 2023). This equates to 1282 individuals.

In 2020 there were 61,880 households who qualified for social housing support which has subsequently dropped in the 2021 count down to 59,274 (HA, 2022: 4), and in 2022 dropped

further to just over 57,000 households. The Parliamentary Budget Office (PBO) estimates that a more accurate figure for households with a housing need may be closer to 122,000, comprising those on HAP, those staying with friends, relatives or parents in overcrowded conditions, those in emergency accommodation and owner occupiers (2022: 36). It must be added that the official figure of 59,274 for those in housing need is only the household figure, the real number of individuals in housing need is actually much higher. The PBO estimates that the 61,880 households with an unmet housing need in 2020 account for a minimum of 111,767 people. If those in HAP tenancies are included along with the cohort with an unmet need, an additional 59,821 households – representing an estimated 152,000 people – would suggest that upwards of 260,000 eligible individuals currently have or would be classed as having a social housing need (PBO, 2022: 37).

7.2 Inadequate housing

The Summary of Social Housing Assessment (SSHA) identifies 3,442 households as being 'overcrowded' (equating to approximately 9,293 individuals) and 897 (2421 individuals) in 'unfit housing'. These are included as categories 12 and 13 under ETHOS HHE definition and are classed as 'inadequate' housing. There are a further category of 1074 households living with an unsustainable mortgage which equates to 2899 individuals.

The SSHA is administrative data that gives a point-in-time snapshot of those households who have applied for and been accepted as being eligible for social housing and are therefore recorded on local authority housing lists as qualified for social housing support.

And while the SSHA provides a wider picture and measure of homelessness, it does not include the aforementioned households in insecure HAP accommodation, nor does it include those who are in housing need but do not apply for social housing including some in hidden homelessness.

The methodological approach of the SSHA is limited in that it is dependent on the individual

in housing need to apply for support and therefore only captures those who have made an application for social housing and have maintained and renewed it annually as requested by local authorities for the purpose of the SSHA. Those who have not applied or renewed are missing from the data. The SSHA, therefore, is likely to be missing important groups who may not proactively apply for social housing need due to certain factors, including those with disabilities or Travellers.

A research participant explained,

“it’s (the housing needs assessment) is very easy to get knocked off of it, as you know. The local authority might write once to those on the list and if they don’t write back they’re off the list. So, it’s I think it’s this issue that they’re not actually trying to get a reliable estimate of the number of people in housing need, because it’s been so politicized and become so controversial they’re trying to get the lowest figure they can reasonably arrive at”

(Interviewee Policy analyst/academic)

With the housing needs assessment, a person has to be aware they can apply for this entitlement in order to be counted as being in housing need:

So, if you don’t, for whatever reason deem yourself suitable or if you’re in the private rental sector or you’re a migrant, you might not be aware of that, you’re not counted

(Interviewee Policy analyst/academic)

Including these households within an ETHOS conceptualisation of homelessness, would give a greater urgency to address their housing needs, rather than being seen as acceptable for people to languish for years on housing waiting lists. If they are defined as being in homelessness, there should be a greater urgency to address their housing needs. We now look at the example of disabled people’s housing needs.

7.3 The hidden housing exclusion of disabled people

Disabled people are affected by hidden homelessness, and experience homelessness and housing exclusion across the different operational categories of ETHOS (homeless living in institutions, living in insecure housing, and unfit housing). Many are not captured in the homelessness statistics in Ireland. For example, the Disability Federation of Ireland (DFI, 2021) showed in a survey of disabled people, 30% of respondents said their current housing was not suitable for their needs. Most of those respondents (between 74% and 83%) were not on the social housing lists, despite the accommodation not being suitable, which is one of the criteria for having a valid application for social housing support. The report stated that between 62% and 75% of respondents were not aware that local authorities can provide social housing to people with disabilities who qualify under a means assessment.

The same report remarked on the lack of sufficient data in relation to assessing people with disabilities who have a housing need, which in turn hinders appropriate policy responses (2021).

The Independent Living Movement Ireland and the Disability Federation of Ireland highlight that some disabled people find housing application processes confusing and in some cases are not aware they are entitled to homeless or social housing assistance and are therefore uncounsed even though they live in hidden homelessness (ILMI, 2021) (DFI, 2021).

The Social Housing Assessment of Needs shows that there were 3,881 households whose specific accommodation requirement was due to a disability (“physical, sensory, mental or intellectual impairment”).

Ireland is a signatory of the Convention on the Rights of Persons with Disabilities and ratified the Convention in 2018. Article 19 states that disabled people have a right “to live in the community, with choices equal to others, to full inclusion and participation in the community, and to the opportunity to choose their place of residence on an equal basis with others” (2006: 13). Despite the number of households on the social housing waiting list declining nationally, there has been a lower level of decline in the number of households who have a disability related need or who require specific accommodation due to a disability (DHLGH, 2022). Those with disabilities are at a higher risk of being in homelessness or housing exclusion. The 2016 census recorded 1,817 homeless persons with some form of disability in Ireland. This represents 27.1 per cent of the total homeless population which is in contrast to the general population where the rate of disabled people was 13.5 per cent (CSO, 2016).



8.

Recommendations



8. Recommendations

Recommendation 1:

Ireland should adopt the ETHOS framework for conceptualising, defining, and measuring homelessness in Ireland and use it to create the foundation for a bespoke data system on homelessness and housing exclusion.

- a. The Department of Housing should use the ETHOS framework as a key conceptual framework to define homelessness in housing policy going forward, including integrating it into the Housing For All quarterly updates, analysing homelessness and policy measures.
- b. The following groups which are included in the ETHOS definition of homelessness should be included in measuring Ireland's homelessness statistics: those due to leave institutions who have no place to go to (e.g. children aging out of care, prisons, health settings), 'couch surfers', those in Domestic Violence refuges, homeless families moved to short lease accommodation, Travellers in substandard accommodation, those in Direct Provision with status to remain.
- c. In addition to continuing to use the PASS system and producing the monthly homelessness statistics based on that, the ETHOS measurement of homelessness in Ireland should be produced on an annual basis to give a more complete measure of homelessness and housing exclusion in Ireland, providing the number of households and individuals, including children.
- d. The CSO should have a greater role in collating and measuring homelessness statistics. The CSO should be given the task and responsibility to gather all existing data sources from across Government Departments and available

data to provide such a comprehensive annual ETHOS framework measurement of homelessness and housing exclusion.

- e. The National Homeless Action Committee should explore how Ireland can implement these recommendations.

Recommendation 2:

Re-examine the definition and assessment of homelessness in the 1988 Housing Act. The 1988 Act should be amended and updated to give a legislative basis for an expanded definition of homelessness in line with ETHOS. It should include children and families as a specific category. A Directive should be issued to local authorities to broaden their classifications in regard to defining someone as homeless or not in line with ETHOS.

Recommendation 3:

Measurement of homelessness cannot be just seen as the responsibility of the Department of Housing. The accurate measurement of homelessness and housing exclusion needs to be seen as a whole of Government and state responsibility to ensure proper measurement of housing needs and therefore ensure policy is needs based and sufficiently preventative and responsive.

Recommendation 4:

Ireland should fulfil its human rights-based obligations to measure homelessness. Fulfilling the right to adequate housing includes proper measurement and response to homelessness and all forms of housing exclusion set out by the UN definition of adequate housing. Inserting the right to housing into the Constitution would enhance the state's obligations around accurate measurement and analysis of housing need. This is a strong additional argument in favour of holding a referendum on inserting the right to housing as a stand-alone legal right in the constitution.

Recommendation 5:

There is a need to accurately assess the level of housing need of those seeking to leave situations of Domestic Violence (DV), and those in DV refuges and sheltered and supported housing, as that housing need is not being captured currently in homelessness measurements, and therefore not included as a requirement in housing provision and homelessness responses. It is a form of 'hidden homelessness'.

TUSLA should develop a counterpart to PASS and report figures for adults and families in refuges. These figures could then be assessed alongside the monthly homelessness statistics to give an accurate picture of the extent of HHE in Ireland.

Recommendation 6:

There is a need to measure those in care of the state, such as children in the care of the state, who are due to leave care without a home to go to, and are likely to go into homelessness, as a category within homelessness statistics. The state should count how many children are due to leave care in the next 12 months as an indicative level of a measure to include in a group at risk of homelessness. This would be a key part of a homelessness preventative approach to avoiding care leavers becoming homeless.

Recommendation 7:

Improve current presentation and analysis of homelessness statistics. There is a need for greater analysis of the data we have and interpreting what it tells us about how policy is or isn't working. The Department of Housing should present an analysis of the data provided in the quarterly performance reports and include it in the quarterly progress reports that is accessible and provided on the Department website. It would be helpful if the media provided a greater focus on this quarterly data. The monthly homelessness data should provide detail on what types of accommodation families are being accommodated in e.g., hotels, B & Bs, Family Hubs, and are they supported or not. This is vital data because of the impact of

emergency accommodation on families and children.

There is a responsibility on policy makers and the media to place a greater focus of energy in analysis and discussion on the data that is available in the quarterly reports on presentations, the lengths of time in homelessness, and wider data on hidden homelessness.

Recommendation 8:

There is a need for proper comprehensive measurement of children (dependents) who are homeless with families, from presentations, to exits, to length of time in emergency accommodation.

There is a need to measure accurately the flow of how many children are experiencing the various aspects of homelessness, including house loss, the numbers presenting as homeless with their families, to how many are entering and exiting homelessness. This is needed nationally across all local authorities, not just in Dublin, and needed to be assessed over Quarterly, and yearly basis. This is needed to provide an accurate number of the scale of children experiencing all aspects of homelessness, but also to provide follow up support and engagement with the children.

Each child presenting as homeless and experiencing homelessness should be counted and followed up with support services.

There should also no family with children without support in emergency accommodation and receiving follow up support subsequently. There are children who have experienced homelessness who no service or school knows about it only the family themselves. This is an unacceptable situation. These children should be provided with services and supports to deal with the trauma of homelessness.

The number of dependents who are over 18 who are in homelessness as part of families should be provided within monthly reports, either categorized as dependents (over 18) with their families or numbered as such as a separate category within the over 18 groups.

Recommendation 9:

There is a need to measure how many people are contacting local authorities in relation to being at risk of, or in homelessness, rather than only measuring those assessed and provided emergency accommodation.

- All those presenting as homeless (making contact with local authority or homeless services) should be included in quarterly data, both those who are classified as homeless and those who are **denied being classed as homeless**. This includes those who the local authority considers not homeless.
- This would also include a clear measurement and classification of those who are classed as homeless but who a local authority is not in a position to provide emergency accommodation, and those who decline an emergency accommodation offer.
- We recommend that two additional categories are included in measuring of homelessness by local authorities. 1. Those who present as homeless (make contact with the local authority) but are denied being classed as homeless 2. Those who present as homeless and are classed as homeless but are not offered accommodation -due to lack of accommodation being available, or the person/family declining the offer of emergency accommodation.

Recommendation 10:

Rebuild confidence in homelessness statistics: Ensure meaningful participation of affected groups and civil society.

- There is a need to rebuild confidence and trust in the homelessness statistics among civil society groups and the public.

A consultation should be undertaken with Homelessness NGOs, Traveller organizations and community groups in relation to applying ETHOS in Ireland. While any further changes to methods of collection should be done with full consultation with key stakeholder groups and clear evidence-based rationale provided.

- Participation is key in order to co-produce a true understanding of the lived reality of homelessness and bring the direct experience of those homeless into the process of conceptualising and measuring homelessness. People who are homeless-should be engaged in a pro-active basis in applying ETHOS, in developing the key measurements of homelessness, and use of peer researchers in measuring and analysing it and developing the conceptualisation of homelessness.
- Include Traveller representatives in defining the most appropriate way to measure homelessness and housing exclusion of Travellers. Implement recommendations of the Traveller Accommodation Expert Review 2019. Ensure the nuances of Traveller accommodation are captured within the conceptualisation and measurement of homelessness.

Recommendation 11:

There is a need to undertake a proactive comprehensive assessment of housing need in Ireland. Those in receipt of HAP should be included on the national social housing waiting list to give a more accurate picture of housing needs and demand. There is a need to measure proactively groups such as disabled people, elderly, young adults living in parental home due to lack of access to housing, and others in situations of housing need.

Recommendation 12:

Further research required:

- Undertake further research into Ireland's 'hidden homelessness' crisis. In particular, undertake participative research methods to gather real experience of levels of hidden homelessness among marginalised groups including as peer-collected data.
- There is a need for more research into the reasons for homelessness and measuring housing need through more detailed quantitative and qualitative research.
- There is a need for research into the impact of homelessness on families, children and individuals, tracking those going through emergency accommodation and documenting and gathering their experiences.



9.

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