POLICY BRIEF | JUNE 2026

COMHOM POLICY BRIEF
Report No 2

Simon Communities of Ireland

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# COMHOM Policy Brief 2
# National Definition of Homelessness

## The Case for Reviewing Ireland's National Definition of Homelessness

A policy brief drawing on COMHOM Problem Phase findings on operational definitions of homelessness in Ireland

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The research leading to these results has received funding from by the European social fund (ESF+) of the European union. (Grant no.101172624)

Produced as part of the COMHOM project, an EU-funded initiative

COMHOM COMPREHENSIVE APPROACH TO COMBATING HOMELESSNESS

Co-funded by the European Union

Simon Communities of Ireland

**Acknowledgment**

This policy brief has been developed as part of the COMHOM project, funded by the European Union under the European Social Fund (ESF+). Simon Communities of Ireland sincerely thanks all COMHOM project partners for their valuable support, guidance, and collaboration throughout the research process.

Special thanks are extended to all participants and stakeholders who generously gave their time to contribute to the COMHOM Project, as well as to the individuals and organisations who supported and facilitated the fieldwork.

Please cite this policy brief as: Ogunjemilusi, K (2026). Strengthening Ireland's Response to Homelessness: The Case for Reviewing Ireland's National Definition of Homelessness. A policy brief drawing on COMHOM Problem Phase findings on operational definitions of homelessness in Ireland. Simon Communities of Ireland. Available from: https://www.simon.ie/publication-type/comhom/

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The views expressed in this policy brief are based on findings from the COMHOM project and do not necessarily reflect the official positions of all participating organisations or funding bodies.

# Executive Summary

This policy brief is informed by evidence from the Problem Phase Living Lab sessions undertaken in Ireland as part of the COMHOM project, an EU-funded initiative examining responses to homelessness. While the broader Living Lab explored multiple dimensions of homelessness, the focus of this brief is the national definition of homelessness and the extent to which it reflects the realities encountered by frontline service providers.

Current definitions of homelessness in Ireland, particularly under the Housing Act 1988, do not adequately capture hidden homelessness and severe housing exclusion. Existing national measurements remain largely centred on visible forms of homelessness, including rough sleeping and the use of emergency accommodation. Consequently, many individuals experiencing insecure, temporary, or inadequate housing circumstances remain outside official definitions and statistical reporting frameworks.

Evidence gathered from frontline service providers identifies significant gaps in the recognition and measurement of hidden homelessness within current policy and data collection systems. Individuals experiencing couch surfing, involuntary sharing arrangements, temporary stays with family or friends, overcrowded housing, insecure tenure, and informal living arrangements are frequently excluded from official homelessness counts despite experiencing ongoing housing instability and unmet housing need.

The findings indicate that the current definition of homelessness remains too narrow to reflect the continuum of housing insecurity experienced across Ireland. By prioritising visible homelessness, current measurement approaches risk underestimating the true scale of homelessness and housing exclusion. This has important implications for policy development, prevention strategies, service provision, and resource allocation, as individuals and groups not formally recognised within existing definitions are less likely to be captured within support systems and intervention measures.

The findings point to the need for a formal review of the national homelessness definition and the adoption of broader measures of hidden homelessness. The brief further recommends adopting the European Typology of Homelessness and Housing Exclusion (ETHOS) framework to support a broader, more consistent understanding of homelessness and severe housing exclusion in Ireland.

Broadening the national definition would improve the accuracy of homelessness data, strengthen recognition of hidden homelessness, support earlier intervention and prevention measures, and enable more effective policy development, service planning, and resource allocation.

# Key Messages Arising from this Research Include



The current national definition of homelessness does not fully capture the continuum of housing instability experienced in practice.



Hidden forms of homelessness, including couch surfing, temporary stays with family or friends, and sleeping in cars or informal settings, remain under-recognised within existing policy definitions and reporting frameworks.



Insecure and inadequate housing conditions, including overcrowding, poor housing quality, and lack of secure tenure, are consistently identified by service providers as significant gaps within current definitions



Official homelessness figures may underestimate the true scale of housing need, as existing measurements rely primarily on visible homelessness and emergency accommodation data



Marginalised groups, including Travellers, migrants, young adults, and individuals in temporary or refugee accommodation, are disproportionately affected by definitional gaps and limited recognition within support systems.



There is a clear need to review and broaden the national definition of homelessness so that policy, reporting, service provision, and eligibility criteria better reflect operational realities and lived experience.

# Background

Homelessness in Ireland has become an increasingly urgent social policy issue, driven by rising housing costs, shortages in affordable rental accommodation, limited social housing supply, and increasing pressure on homelessness and emergency accommodation service[1]. The legal basis for defining homelessness is set out in Section 2 of the Housing Act 1988[2], which defines a person as experiencing homelessness where no accommodation is available that they can reasonably occupy, or where they are living in an institution or shelter because they have no suitable accommodation of their own. This definition forms the basis on which local authorities assess need and provide homelessness services.

In practice, official homelessness figures in Ireland are primarily based on data recorded through the Pathway Accommodation and Support System (PASS)[3], which captures the number of adults and children accessing state-funded emergency accommodation each month[4]. Current statistics reported 17,548 individuals relying on emergency accommodation as of April 2026[5], representing an increase of approximately 154% over the past decade[6]. While this provides an important measure of visible homelessness, it captures only a limited segment of the broader population experiencing housing exclusion[7]. Individuals temporarily staying with family or friends, living in overcrowded accommodation, residing in domestic violence refuges, or sleeping in cars and other insecure settings may not be fully reflected in official counts[8]. These experiences are commonly associated with hidden homelessness.

At the European level, the ETHOS (European Typology of Homelessness and Housing Exclusion) framework[9] provides a broader understanding of homelessness, encompassing rooflessness, houselessness, insecure housing, and inadequate housing. ETHOS Light was subsequently developed as a harmonised statistical framework designed to support comparative measurement across European countries[10]. It identifies six operational categories, including rough sleeping, emergency accommodation, temporary shelters, institutional settings, non-conventional dwellings, and temporary stays with family or friends due to lack of housing. Although ETHOS is widely used as a comparative research and policy tool, Ireland's official measurement system (PASS) continues to rely on a narrower administrative definition centred largely on emergency accommodation use[11]. Recent discussions at the European level, including findings from FEANTSA's Overview of Housing Exclusion in Europe reports on homelessness measurement and comparative data collection[12], highlight that many national data reporting systems across member states continue to focus primarily on visible homelessness despite the development of broader frameworks such as ETHOS Light. This contributes to the continued underrepresentation of hidden homelessness and insecure housing situations within official statistics.

Similar concerns are evident in the Irish context, where current administrative definitions and reporting frameworks may continue to privilege visible homelessness while less visible forms remain inadequately recognised[13]. This discrepancy raises concerns that the scale and nature of homelessness in Ireland may be significantly underestimated, with important implications for prevention policy, service planning, and resource allocation

This policy brief focuses specifically on the national definition of homelessness in Ireland, examining the extent to which current policy and reporting frameworks reflect the operational realities encountered by frontline service providers. Strengthening the definition to include hidden, insecure, and inadequate housing situations is critical to improving data accuracy, supporting earlier intervention, and enabling more effective evidence-informed homelessness policy.

## The COMHOM Project

COMHOM[14] is a three-year European project designed to strengthen homelessness responses through digitalisation, social innovation, and improved monitoring and evaluation practices. The project involves five participating countries: Finland, Greece, Ireland, Portugal, and Spain. Through a participatory Living Lab and soft systems approach, the project engages multiple stakeholders, including Individuals with lived experience, service providers, and policymakers to co-design digital solutions.

A key objective of COMHOM is to develop a standardised monitoring and evaluation framework supported by digital tools that enable harmonised data collection and secure information sharing across organisations. These tools aim to support practitioners, service managers, and policymakers by improving access to reliable data and enabling evidence-based decision-making.

Phase 1 of the project focused on defining the homelessness problem through stakeholder engagement. In Ireland, interviews were conducted with service providers, policymakers, and individuals with lived experience of homelessness. This policy brief focuses specifically on insights from frontline service providers, whose perspectives provide valuable understanding of how homelessness is managed operationally within the service system.
Phases 2 & 3 are ongoing.

## What did the research explore?

This brief draws on findings from the Problem Phase of the COMHOM project in Ireland, based on engagement with twenty-eight homelessness service agencies through working sessions and interviews. The analysis focuses specifically on frontline service providers' perspectives on the national definition of homelessness and the extent to which it reflects operational realities in practice.

## What were the main findings?

Homelessness is experienced as a continuum of housing instability extending beyond rough sleeping and emergency accommodation.



Current national definitions do not fully reflect hidden, insecure, and inadequate forms of homelessness encountered in practice.



Hidden homelessness, including couch surfing, temporary stays with family or friends, sharing accommodation with strangers, and sleeping in cars or other informal settings, remains insufficiently recognised within existing policy and reporting frameworks.



Overcrowding, poor housing conditions, housing deterioration, and lack of secure tenure are not adequately captured within formal homelessness definitions.



Rough sleeping, unsheltered homelessness, and living in tents are not always consistently reflected in official reporting systems and service eligibility criteria.



Significant accommodation barriers affect migrants without legal status, Travellers, young adults unable to access independent housing, and individuals living in refugee or temporary accommodation such as International Protection Accommodation Services (IPAS).



Institutional and transitional settings, including mental health facilities, domestic violence shelters, prisons, hotels, and Bed and Breakfast accommodation (B&Bs), are frequently identified as forms of housing exclusion in practice.



Official homelessness figures may underestimate the scale of housing need, as current data collection systems rely heavily on emergency accommodation use. support needs invisible within official systems.



## Policy Implications

| Policy Area / Factor | Implication for Homelessness Services |
|---|---|
| Narrow national definition of homelessness | Limits recognition of hidden, insecure, and inadequate housing situations, reducing access to support and prevention services. |
| Reliance on emergency accommodation data | May underestimate the scale of homelessness and affect service planning, funding allocation, and policy priorities. |
| Exclusion of housing insecurity indicators | Limits early identification of households at risk of homelessness, weakening prevention-focused responses. |
| Limited recognition of marginalised groups | Risks excluding Travellers, migrants, and young adults with specific accommodation needs from targeted supports and interventions. |
| Gaps in temporary and transitional accommodation categories | Individuals in IPAS hotels, B&Bs or other temporary placements may remain outside formal homelessness counts despite ongoing housing need. |
| Misalignment between policy and operational definitions | Creates inconsistencies in assessment processes, eligibility criteria, and national reporting frameworks. |
| Incomplete evidence based on hidden homelessness | Weakens evidence-informed policymaking and accurate assessment of housing need. |
| Limited alignment with ETHOS and ETHOS Light frameworks | May restrict broader recognition and measurement of hidden homelessness and housing exclusion within the Irish reporting system (PASS) |

## The Bottom Line

Homelessness in Ireland has become an increasingly urgent social policy issue, shaped by The evidence suggests that the current national definition of homelessness in Ireland is too narrow to capture the full range of housing instability experienced in practice. Service providers consistently identify forms of hidden homelessness, including couch surfing, overcrowded housing, temporary living arrangements, and informal accommodation, that are not fully reflected in existing definitions or official counts.

This creates a gap between how homelessness is measured and how it is experienced, with important consequences for service planning, prevention, and resource allocation. When policy frameworks rely primarily on visible homelessness and emergency accommodation data, significant levels of need remain unrecognised.

A broader and more inclusive definition is needed to reflect the realities encountered by service providers and to ensure that vulnerable groups are not excluded from support. Strengthening the definition would improve the quality of national data, support earlier intervention, and enable a more accurate assessment of homelessness across Ireland.

A clearer understanding of hidden and insecure homelessness would also place policymakers in a stronger position to design targeted responses, allocate resources more effectively, and develop evidence-informed strategies that better reflect lived experience.

## Policy Recommendations

- The Department of Housing, Local Government and Heritage should undertake a formal review of the national definition of homelessness under the Housing Act 1988, in consultation with local authorities, frontline service providers, people with lived and living experience, and relevant advocacy organisations, to ensure that it reflects the full continuum of housing instability experienced in practice.

- The review should explicitly consider the inclusion of hidden homelessness within the national definition, including couch surfing, temporary stays with family or friends, sleeping in cars, and other informal or insecure living arrangements that are currently under-recognised in policy and reporting systems.

- The revised definition should align, where appropriate, with broader frameworks such as ETHOS / ETHOS Light, to better capture rooflessness, insecure housing, and inadequate housing within the Irish context.

- The outcome of the review should inform a standardised national definition for policy, reporting, and service assessment purposes, reducing gaps between operational realities, data collection practices and formal recognition across homelessness services in Ireland.

- National homelessness reporting should be expanded beyond PASS and emergency accommodation data to include indicators of hidden homelessness and housing insecurity.

- Periodic national research on hidden homelessness should be undertaken to complement administrative homelessness statistics and improve understanding of unmet housing need.

- Coordination and data sharing between housing, health, social protection, children, justice, and homelessness services should be strengthened to improve identification of households experiencing hidden homelessness.

# Proposed Implementation Roadmap



## Phase 1

Evidence Building and Consultation

## Implementation Stage

Short-term Actions

## Priority Actions

Initiate a phased review of hidden homelessness in Ireland

## Key Activities:

- Commission national research on the scale and experiences of hidden homelessness
- Engage local authorities, homelessness organisations, advocacy groups, researchers, and individuals with lived experience
- Map gaps in current data systems (including PASS limitations)
- Evaluate the legal, policy, and resource implications of formally recognising hidden homelessness within national homelessness frameworks

## Lead Stakeholders

Department of Housing, Local Government and Heritage; Research institutions; Local authorities; Homelessness organisations

## Intended Outcome

Development of an evidence base to inform proportionate and evidence-informed policy reform

## Phase 2

Strengthen Recognition of Hidden Homelessness and Soft Integration

## Implementation Stage

Medium-term Actions

## Priority Actions

Improve visibility of hidden homelessness in policy and practice

## Key Activities

- Issue national policy guidance recognising hidden homelessness as a distinct policy concern
- Integrate recognition into prevention and housing support strategies as a preparatory step for statutory definition reform
- Develop advisory/service-level definitions for operational use
- Train frontline staff on identifying concealed housing insecurity

## Lead Stakeholders

Department of Housing, Local Government and Heritage; Local authorities; Homelessness and housing services

## Intended Outcome

Improved visibility and recognition of hidden homelessness across policy and service systems

# Proposed Implementation Roadmap




## Phase 3

Definition Review and Data Development

## Implementation Stage

Medium-term Actions

## Priority Actions

Reform statutory definition and strengthen homelessness data systems

## Key Activities:

- Conduct a formal review of the homelessness definition under the Housing Act 1988
- Use ETHOS Light as a reference framework for understanding and comparability within the Irish context
- Develop proposals for revised or expanded statutory interpretation of homelessness
- Integrate PASS with complementary administrative datasets (health, welfare, housing)
- Develop indicators for hidden homelessness (e.g. sofa surfing, overcrowding, temporary arrangements)
- - Expand homelessness reporting beyond emergency accommodation data

## Lead Stakeholders

Department of Housing, Local Government and Heritage; Dublin Region Homeless Executive.; Health Service Executive (HSE); Housing and homelessness services

## Intended Outcome

A more inclusive statutory definition and improved measurement of both visible and hidden homelessness

## Phase 4

System Integration, Coordination and Monitoring

## Implementation Stage

Long-term Actions

## Priority Actions

Strengthen cross-sector coordination and ongoing monitoring

## Key Activities

- Embed early identification tools for housing insecurity in frontline services
- Institutionalise periodic national research on hidden homelessness to address ongoing evidence gaps and inform future policy development
- Establish an ongoing monitoring framework for definition and data effectiveness
- Align prevention strategies with the revised homelessness classification system
- Introduce indicators capturing hidden homelessness and housing insecurity
- Periodically review the effectiveness of revised definitions and reporting systems

## Lead Stakeholders

Department of Housing, Local Government and Heritage; Research institutions; HSE; Department of Social Protection; Local authorities; Homelessness organisations

## Intended Outcome

More coordinated, evidence-informed, and sustainable system for prevention, identification, and response to all forms of homelessness

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COMHOM Case Study Report: A Lived Experience Case Study from the COMHOM Project - Problem Phase, Ireland

COMHOM Policy Brief 1: The Case for Improving Digital Integration and Data Coordination in Ireland

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## About Simon Communities of Ireland

**We lead campaigns advocating for effective policies and legislation to tackle homelessness, drawing on evidence, best practices, and the lived experiences of people accessing services. Our work spans local, national, and European levels, focusing on practical, sustainable solutions to address homelessness directly.**

**Our mission is to end homelessness across Ireland.**


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**Registration Number: 74038**
**Charity Number: 8273**


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