



**COPE Galway**  
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## **Introduction and Background**

COPE Galway is a local Galway charity that provides a range of services to some of the most vulnerable and isolated people in Galway. The services we provide are across three main areas:

- Homeless Services
- Domestic Abuse Services for Women and Children
- Nutritional and Social supports for Older People

Our vision is a community where every person is valued, cared for, and supported at every stage of life.

We work to achieve this vision by providing essential supports for people at challenging times in their lives, and by advocating for systemic change to remove the root causes of inequality and disadvantage that constrain the wellbeing and development of individuals, families and communities.

Our mission is to make a positive difference by empowering people, creating change, and strengthening communities.

We understand, respect, and respond to the needs of those who struggle with the challenges of homelessness and domestic abuse, and we support older people towards healthy and active ageing.

COPE Galway welcomes the opportunity to make a submission in relation to the Galway City Council Draft City Development Plan 2023-2029. We have previously made a submission to the issues papers last year. We highlighted several issues in relation to housing, homelessness and older people, which are summarised below.

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COPE Galway CLG, Registered Office: Calbro House, Tuam Road, Galway.  
CRO No. 248134 Registered Charity No. 20011314 Revenue No. CHY6339  
Board of Directors: P. Timon (Chair), A. Heaney (Vice-Chair), C. Feeney, C. Greaney, C. Healy,  
S. Lennon, C. Mangan, E. McGuane, M.T. Ni Dhubhghaill, C. O'Donnellan, Fr. J. Roche.  
**Patron: Sabina Coyne Higgins**

- There is a continuing prevalence of rough sleeping in Galway City.
- Shortage of appropriate housing and accommodation - 866 households who qualified for Social Housing Support in Galway City are single people<sup>1</sup>. Importantly, many of those accessing homeless services are single person households and would prefer an adequate live-alone option. The increasing number of single people who are homeless in emergency and transitional accommodation is evidence of this.
- Families and single people residing long term in tourist accommodation is still an issue within Galway City.
- Use of dorm style accommodation during the winter months is not appropriate into the future; Covid-19 has highlighted the unsuitability of such accommodation as shelter for vulnerable adults.
- Currently there are a number of social housing complexes for older people throughout Galway City. We are concerned that the concentration of older people with complex support needs in small communities makes it difficult for residents to support each other as a thriving resilient community should.
- COPE Galway were also concerned that older residents may not have the capacity to advocate for themselves and without the strong advocacy efforts from independent agencies, challenges in regards maintenance issues would go unanswered.
- For some older people living in their own home, in our experience, without assistance can find it difficult to access the Housing Assistance Grant.
- COPE Galway is seriously concerned that as people age they may struggle to afford paying rents so as to be able to afford to continue to live in Galway City.
- We are also concerned for some older people living in local authority housing who may not have the support of a significant other or of family. When challenges in their lives arise, sometimes due to a lack of coordination between services and the absence of a

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<sup>1</sup> Housing Agency. 2019. Summary of Social Housing Assessments 2019.34

lead authority as well as difficulties concerning the sharing of information because of data protection considerations, this can lead to missed services and supports.

We also offered some solutions, of which we have summarised below;

- COPE Galway strongly advocates that social housing need must be met through the construction of additional social housing units.
- COPE Galway would like to highlight that a one size fits all approach must not be taken. New social housing design must ensure the possibility of adaption as people age or experience new challenges such as issues with mobility. New social housing should adhere to universal design principles.
- New developments must be designed to ensure they are mixed communities with mixed tenure.
- Housing options that give older people the opportunity to downsize while continuing to live in their own community can benefit the entire community as well as utilising housing stock to its potential.
- With the provision of any new social housing, the adaption for the utilisation of smart technology to support older people to continue to live in their communities must be included.
- Along with the provision of housing, adequate levels of response must be provided to ensure when issues regarding maintenance and heating are dealt with quickly.
- Along with the provision of housing, the health and well-being of its residents is important and with this the coordination of services for vulnerable older people needs to be prioritised.
- COPE Galway as an organisation recognises the strengths that all those we work with have. We feel that any Development Plan must recognise and promote the strengths within the Galway's diverse range of communities.

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- Finally COPE Galway suggested that Galway City engage with the WHO 10 priorities towards a Decade of Healthy Ageing 2020 – 2029.

COPE Galway has also recently made a submission regarding the Western Region Homeless Action Plan, from which some of our information and recommendations are detailed in this submission.

### **Trauma Informed.**

COPE Galway is on a journey to becoming Trauma Informed. It is important that the services, agencies and partners we work with also become trauma informed.

The term “ACEs” is an acronym for Adverse Childhood Experiences and are attributed to three specific kinds of adversity children faced in the home such as abuse, neglect, and family dysfunction. The more ACEs a child experiences the increased likelihood of experiencing health issues, poor academic performance, and substance use in later life.

Experiencing many ACEs coupled with external factors such as community violence or racism without a supportive caregiver can lead to toxic stress<sup>2</sup>.

A recent systematic review and meta-analysis noted that the total annual costs attributable to ACEs were estimated to be \$581 billion in Europe, 77% of these costs arose in individuals with two or more ACEs. This study identified potentially 319 million adolescents and adults (15 years and older) across Europe who could have a legacy of ACEs, with 142 million individuals in Europe having experienced multiple ACEs. Each individual could carry ACE related vulnerabilities to health-harming behaviours and, ultimately, non-communicable diseases<sup>3</sup>.

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<sup>2</sup> <https://developingchild.harvard.edu/resources/aces-and-toxic-stress-frequently-asked-questions/>

<sup>3</sup> Bellis MA, Hughes K, Ford K, Ramos Rodriguez G, Sethi D, Passmore J. Life course health consequences and associated annual costs of adverse childhood experiences across Europe and North America: a systematic review and meta-analysis. *Lancet Public Health*. 2019 Oct;4(10) 130

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Another systematic review and meta-analysis aimed to estimate the annual health and financial burden of ACEs for 28 European countries, found that total ACE-attributable costs ranged between 1.1% and 6.0% of nations' gross domestic products. In Ireland, they estimated that costs of ACEs attributed to 2% of GDP<sup>4</sup>.

Irish Research from 6,706 respondents aged 50 years and older found that than 22.3% of the sample reported that they grew up poor, 8.5% reported alcohol or substance abuse by their parent(s), 6.9% reported that they had experienced physical abuse, and 6.1% reported that they had experienced sexual abuse. Overall, 33.6% of the sample revealed that they had experienced at least one adverse childhood event prior to 18 years of age. 25.8% of the sample experienced one type of adverse childhood event, 5.9% experienced two adverse childhood events, and a further 1.9% experienced three or more<sup>5</sup>. Another piece of research of 2,047 men and women aged 50–69 years, found that ACEs were common among older adults in Ireland and are associated with higher odds of later-life depressive symptoms, particularly among those with poor perceived social support. 23.7% of participants reported at least one ACE<sup>6</sup>.

No one is immune to trauma. However, due to structural inequalities trauma can disproportionately affect some groups. For example, research indicates that families experiencing poverty in urban areas can experience multiple traumas and due to diminished access to resources have difficulty coping. Repeatedly being exposed to trauma can lead to severe and long-lasting reactions in many family members, transmitting through the family system and wider society. The entire family is affected by exposure to trauma and families

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<sup>4</sup> Hughes, K., Ford, K., Bellis, M. A., Glendinning, F., Harrison, E., & Passmore, J. (2021). Health and financial costs of adverse childhood experiences in 28 European countries: a systematic review and meta-analysis. *The Lancet. Public health*, 6(11), e848–e857.

<sup>5</sup> McCrory C, Dooley C, Layte R, Kenny RA. The lasting legacy of childhood adversity for disease risk in later life. *Health Psychol*. 2015 Jul;34(7):687-96.

<sup>6</sup> Cheong EV, Sinnott C, Dahly D, *et al* Adverse childhood experiences (ACEs) and later-life depression: perceived social support as a potential protective factor *BMJ Open* 2017.

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“experience chaotic, disorganized lifestyles, inconsistent and/or conflicted relationships, and crisis-oriented coping”<sup>7</sup>. COPE Galway is concerned that members of the Travelling community are at risk of trauma and its negative effects. Research highlights that the average Traveller household has 5.3 persons per household, with almost 8,000 living in an urban setting, in overcrowded accommodation<sup>8</sup>. 65% of Travellers have experienced discrimination and 52% have experienced hate-motivated harassment. Travellers experience poverty, severe material deprivation and social exclusion and 1 in 10 often go to bed at least once a month hungry. 1 in 4 experience severe housing deprivation<sup>9</sup>. Suicide rates are 6.6 times higher among men of the Travelling community than the general population. Members of the Traveller community suffer from mental health issues, poor self-esteem and self-efficacy and experience fatalistic thoughts<sup>10</sup>. Ninety percent of individuals seeking services from Exchange House Ireland present with trauma<sup>11</sup>.

We also understand that many people who are at risk of or are experiencing long-term homelessness have been disproportionately exposed to trauma with most having experience four or more ACEs. Trauma also frequently occurs during episodes of homelessness, further compounding the challenges a homeless person faces and increasing

<sup>7</sup> Collins, K., Connors, K., Davis, S., Donohue, A., Gardner, S., Goldblatt, E., Hayward, A., Kiser, L., Strieder, F., Thompson, E. (2010). Understanding the impact of trauma and urban poverty on family systems: Risks, resilience, and interventions. Baltimore, MD: Family Informed Trauma Treatment Center.2

<sup>8</sup> Central Statistic Office. Census of Population 2016 – Profile 8 Irish Travellers, Ethnicity and Religion.

<sup>9</sup> FRA – European Union Agency for Fundamental Rights. (2020). Travellers in Ireland — Key Results from the Roma and Travellers Survey 2019.

<sup>10</sup> AIHHS, (2010). All Ireland Traveller Health Study - Our Geels. UCD. Department of Health and Children, Dublin

<sup>11</sup> Exchange House Ireland National Traveller Service represented by Ms. Allyson Coogan, Head of the Mental Health, Family Support and Crisis Intervention Service Opening Statement on the Key Issues Affecting the Traveller Community October 8, 2019: Available at [https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint\\_committee\\_on\\_key\\_issues\\_affecting\\_the\\_traveller\\_community/submissions/2019/2019-10-08\\_opening-statement-allyson-coogan-health-and-social-care-manager-exchange-house-ireland\\_en.pdf](https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint_committee_on_key_issues_affecting_the_traveller_community/submissions/2019/2019-10-08_opening-statement-allyson-coogan-health-and-social-care-manager-exchange-house-ireland_en.pdf)

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risks to their physical and psychological safety. Furthermore, the absence of a safe and stable home can in and of itself be traumatising.

COPE Galway is committed to working towards becoming a trauma informed organisation, one that is trauma aware and that consciously aims not to trigger or retraumatise clients but rather to focus on building trusting and effective professional relationships. It is an attitudinal shift that accepts that the people may exhibit trauma responses to their surroundings and situations and that we as services must adapt our responses to this in order to ensure that individuals and communities traditionally most likely to disengage from services can stay engaged and feel safe, respected, empowered, trusted and welcomed. The benefits of ensuring our services meet the needs of our client group are manifold.

The six principles espoused by Trauma Informed Care are:

1. Safety
2. Trustworthiness & transparency
3. Peer support
4. Collaboration & mutuality
5. Empowerment & choice
6. Cultural, historical & gender issues

The often-damaging effects that trauma has on both physical and mental health are widespread within our communities. To address this issue, broad-based solutions are required to both prevent and lessen the trauma experienced by so many. Public policy is vital in determining how health and human services are provided to a population. As mentioned on Galway City Council's website the City Development plan sets out policies and

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objectives to guide the sustainable development of the City over the lifetime of the Plan to 2029<sup>12</sup>. COPE Galway recommends that consideration be given to these values and that they be incorporated into the City Development Plan.

The plan should ensure the creation of safe physical environments, such as housing, estates and open areas and parks as well as Council buildings themselves. Positive relationships between residents, Galway City Council and other agencies should be promoted and fostered. Opportunities for growth and community building activities should be encouraged as should collaboration between, residents, City Council and agencies. Opportunities for communities to work together on issues of concern must be provided for and the plan must value the varied history, culture and diversity of Galway City.

### **Inclusion.**

COPE Galway notes that the draft states the intention 'to make Galway an equal and inclusive city, particularly through facilitating all forms of social inclusion in the built environment, including in the public realm, housing, and community facilities and in the ability to access services, amenities, employment opportunities and public transportation<sup>13</sup>'. Many of those we work with face exclusion, as already highlighted members of the Travelling community experience discrimination and are the most at risk of being homeless. While representing less than 1% of the population they make up 9% of the homeless population. They are almost ten times as likely to report discrimination in access to housing as the general population<sup>14</sup>.

We also work with a large number of migrants who are rough sleeping in the city. This cohort face multiple barriers in transitioning out of rough sleeping. The lack of year-round

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<sup>12</sup> <https://www.galwaycity.ie/development-plan-2023-2029>

<sup>13</sup> Draft Galway City Development Plan 2023-2029. 187

<sup>14</sup> Grotti, Raffaele & Russell, Helen & Fahey, Éamonn & Maitre, Bertrand. (2018). Discrimination and Inequality in Housing in Ireland. ix

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emergency accommodation beds available to those who are not ordinarily eligible to access homeless accommodation services and the shortage of spaces on a night-to-night basis in the Cold Weather Response this past winter on 2021/22 are contributing factors to a situation where persistent rough sleeping is now an ongoing feature in Galway City.

Young people are six times more likely to experience discrimination than those aged 65 and over. They are more likely to experience housing deprivation, to live in a neighbourhood with poor environmental conditions, and to live in an over-crowded household<sup>15</sup>. Many young people who are on social housing waiting lists have little chance of receiving a social housing allocation in the short to medium term due to their age and the short length of time on the waiting list. This means many young people need to look to the private rented sector with most reliant on HAP.

COPE Galway notes the draft statement 'The Council seeks to prevent undue segregation through application of the Housing Strategy 2023-29. It encourages a variety of house types and sizes throughout the city to cater for all including families, single person households and those with specialist housing needs such as members of the Traveller Community, older people, people with disabilities and people who are homeless'<sup>16</sup>. COPE Galway wishes to highlight that people who are homeless are not a separate or distinct group, they are families, single people, members of the Traveller Community, older people and people with disabilities. Homelessness and housing precarity are pervasive in our communities and COPE Galway is concerned that treating those who are homeless as a separate group may cause stigma and could lead to misconceptions and misunderstanding as to what homelessness is.

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<sup>15</sup> Grotti, Raffaele & Russell, Helen & Fahey, Éamonn & Maitre, Bertrand. (2018). Discrimination and inequality in housing in Ireland. 74

<sup>16</sup> Draft Galway City Development Plan 2023-2029. 187

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COPE Galway recommends that the Development Plan ensure inclusion by guaranteeing adequate service provision so those who are most excluded can access relevant services such as emergency accommodation and affordable housing.

COPE Galway welcomes the drafts objective of supporting a diverse range of housing types, size and tenures<sup>17</sup>. However, a later objective states, “Proactively promote all forms of social inclusion, where feasible in land use planning particularly in the built environment and public realm, housing, community facilities, employment opportunities, transport and accessibility”<sup>18</sup>. Social inclusion is essential in supporting a diverse range of housing types, size and tenures. COPE Galway believes that inclusion is vital and not something that should only be considered if it is feasible. The qualification ‘where feasible’ must be removed to reflect this commitment.

COPE Galway wishes to highlight that the draft Development Plan does not mention Public Sector Equality and Human Rights Duty. Public Bodies’ have a legal obligation to eliminate discrimination, promote equality, and protect human rights of staff and service users. The Galway City Development Plan needs to take into consideration the Duty in its design, implementation and monitoring.

## **Housing**

As stated in our previous submission COPE Galway strongly advocate for an increase in social housing through the construction of additional units. We are concerned that the draft does not note the role the private sector has in meeting social housing delivery<sup>19</sup>, with our concern primarily being the role the private rental market will play in delivery through HAP and RAS. As noted in the Galway City Housing Strategy and Housing Need & Demand

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<sup>17</sup> Draft Galway City Development Plan 2023-2029. 65

<sup>18</sup> Draft Galway City Development Plan 2023-2029. 190

<sup>19</sup> Draft Galway City Development Plan 2023-2029. 62

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Assessment the vast majority of new social housing tenancies based on the 2016-2020 average have been delivered through HAP, totalling 74.2% of all delivery<sup>20</sup>.

COPE has long advocated that HAP is not a suitable social housing option. COPE Galway's view is that while HAP has a role to play for some in need of social housing as an interim or short-term housing solution, it should not be viewed as a long-term solution as it leaves those with a housing need, vulnerable to the precariousness of the private rental market.

COPE Galway strongly advocates that the target for additional social housing be revised to include provision to allow households to transfer out of HAP. The current target of 1,575 social homes and 903 affordable homes for Galway City as detailed in Galway City Housing Strategy and Housing Need and Demand Assessment<sup>21</sup> project and included as a policy objective in the draft plan needs to be revised in the context of the need for 3,946 including 2,115 being accommodated through HAP and RAS<sup>22</sup>.

## **Homelessness**

COPE Galway recently made a submission in respect of the Western Region Homeless Action Plan and many of the points articulated in this submission will be re-emphasised here. The Draft states "the Housing First Programme for rough sleepers is a critical support to homeless persons utilising one bed accommodation units in the city with significant wrap-around supports provided by key agencies"<sup>23</sup>. COPE Galway wishes to highlight that there are 769 single person households and 44 couple households on Galway City social housing waiting list<sup>24</sup>, equating to a need of 813 one-bedroom social housing units.

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<sup>20</sup>Galway City Council. Galway City Housing Strategy and Housing Need & Demand Assessment 2023-2029. 41

<sup>21</sup>Galway City Council. Galway City Housing Strategy and Housing Need & Demand Assessment 2023-2029. 68

<sup>22</sup>Galway City Council. Galway City Housing Strategy and Housing Need & Demand Assessment 2023-2029. 71

<sup>23</sup>Draft Galway City Development Plan 2023-2029. 64

<sup>24</sup>Summary of Social Housing Assessments 2020. 32

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Prior to the release of Housing for All, we made a submission regarding the strategy in which we highlighted that “(t)he acute shortage of one bed units presents a significant challenge in Galway and the Western Region in respect of the successful delivery of Housing First”. The latest progress report on Housing for All states that Action 3.3 Publish a new Housing First National Implementation Plan is complete<sup>25</sup>. It provides for the creation of 1,319 additional tenancies between 2022 to 2026, involving an average of 264 new tenancies per year, 30 in Galway city<sup>26</sup>. Looking at targets against progress from the last plan in Galway City there was a target of 30 tenancies in the city however, 20 tenancies were achieved<sup>27</sup>. The dearth of one bedroom properties in Galway is a contributing factor to this situation. With a target of 6 tenancies each year for 2022 and in 2024<sup>28</sup>. COPE Galway is concerned that this programme is starting from a deficit, this issue must be addressed.

COPE Galway has been providing an early morning street outreach service one to two days per week and on a more frequent basis when required for a number of years. This has recently been expanded to four mornings a week. The focus of this outreach service has been on engagement, relationship building and sign posting to services and supports with primary health interventions being provided through the Multi-Disciplinary Team (MDT) for homeless one of these mornings each week. What is evident through our engagement with rough sleepers is the notable number of migrants. They account for the most significant proportion of those who are sleeping rough in Galway City. Very few have habitual residency status, just one of multiple barriers they face to transitioning out of rough sleeping. Not satisfying habitual residency conditions can be a barrier when attempting to access homeless and housing services. The lack of year-round emergency accommodation beds available to those who are not ordinarily eligible to access homeless accommodation services and the shortage of spaces on a night-to-night basis in the Cold Weather Response

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<sup>25</sup> Housing for All: Q4 2021 Progress Report. 20

<sup>26</sup> Housing First National Implementation Plan 2022-2026. 5-6

<sup>27</sup> Housing First National Implementation Plan 2022-2026. 15

<sup>28</sup> Housing First National Implementation Plan 2022-2026. 25

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over the past winter are contributing factors to a situation where persistent rough sleeping is now an ongoing feature in Galway City.

It is also important to highlight that this cohort are not deemed eligible for Housing First and alternative options must be provided. A prerequisite to assertive and effective outreach work which can support rough sleepers into accommodation is the availability of accommodation into which they can be referred and placed. COPE Galway recommends that to adequately address rough sleeping in Galway City and to ensure any outreach support has a focus beyond providing basic humanitarian assistance, the following are put in place;

- Increase the provision of accommodation, emergency and move-on, targeted specifically on homeless
- Assess and approve households for emergency homeless accommodation based on the definition set out in the Housing Act 1988.

In our experience having access as a minimum to a bed is a beginning to providing the security and stability for rough sleepers to transition into more stable accommodation through sourcing employment, education or other relevant services, none of which can realistically be achieved or maintained while rough sleeping. Without the provision of all-year round emergency bed capacity a cohort of rough sleepers will remain rough sleeping and dependent on outreach and Day Centre services to access food and washing such as those provided by COPE Galway and on the goodwill of the public.

COPE Galway notes that the draft states “under Housing for All the government is committed towards the eradication of homelessness by 2030 and the Council will implement any new initiatives arising from Housing for All in conjunction with relevant stakeholders”<sup>29</sup>. COPE Galway wishes to highlight that Housing for All also commits to providing funding to develop supported further emergency accommodation for families and

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<sup>29</sup> Draft Galway City Development Plan 2023-2029. 64

individuals experiencing homelessness<sup>30</sup>. In order to successfully address homelessness in Galway City, the first step is to ensure there are enough emergency beds available. As already stated, COPE Galway recommends increasing emergency bed capacity in Galway City on a year round basis and in increasing emergency beds it is important that the accommodation provided upholds the dignity and respect individuals experiencing homelessness deserve. Any increase in beds available must at a minimum be single occupancy en-suite rooms.

As mentioned, there is a real and pressing need for additional emergency accommodation in Galway City at this time, as evidenced by the near 100% occupancy rates in the Cold Weather Response in the winter of 2021/22. How further emergency accommodation is designed, developed and operated, needs to reflect the commitment and belief that homelessness can be ended. When designing new emergency accommodation, consideration needs to be given to ensuring the infrastructure of this emergency accommodation provision can be easily converted for use as permanent housing and the approach to the operation of any additional emergency accommodation needs to be one which empowers and enables individuals and families to develop and practice the necessary life skills and home management which will contribute to sustaining tenancies into the future and which will enhance the lives of household members, most especially children in the case of families. The experience during the COVID-19 pandemic in respect to the temporary provision of additional emergency accommodation throughout the two years since March 2020, and in particular the Cold Weather Response project over the past two winters, is one that has been generally very positive in terms of the quality of the accommodation and the safety and wellbeing of those accommodated. This accommodation, consisting of en-suite single rooms, has provided the privacy, space, safety and dignity that individuals experiencing homelessness deserve and should be the minimum level of quality of emergency accommodation into the future. This is in marked contrast to

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<sup>30</sup> Housing for All A new Housing Plan for Ireland. 55



the dormitory style accommodation available for the Cold Weather Response for the previous four winters where up to seven people shared a single sleeping area and one WC and relied on the day centre for shower and washing facilities , something that should not be returned to again in the view of COPE Galway

COPE Galway recently in our recent submission in respect of Western Regions Homeless Action Plan recommended that the values mentioned earlier, espoused by Trauma Informed Care, be incorporated into all homeless services delivered in the Western Region. In line with this, we recommend a commitment be made to the FEANTSA (the European Federation of National Organisations Working with the Homeless) recommendations for psychologically informed and trauma informed services including;

- Create a physical environment that is safe
- Develop services based on the assumption that the service user will be managing the effects of trauma
- Minimise barriers to service (low threshold and harm reduction)
- Ensure that services do not retraumatise service users.
- Ensure a gendered approach (trauma affects men and women differently)
- Establish services that offer caring, long-term relationships
- Provide training on trauma informed care and therapeutic relationships
- Make services client-driven

We understand that homelessness can be a traumatic experience and should be a moment in a person's life. However, for many, without the option of appropriate move on accommodation, they will become long-term homeless. COPE Galway recognises this and has worked with Galway City Council to acquire and secure properties within the community that allow individuals to move from a hostel setting into shared accommodation in housing units pepper potted across the city. This fosters an environment of independence and empowerment and, we feel, is a more appropriate real-world option to homeless provision rather than long-term residing in an emergency accommodation environment. We do

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acknowledge that it is not the solution to homelessness, rather an appropriate response. This however, is a model that should be explored if increasing emergency accommodation provision.

Other areas within our recent submission on the Western Region Homeless Action Plan that we wish to highlight is Youth Homelessness and Older People experiencing Homelessness.

A growing concern for COPE Galway is the number of older people who are presenting to us for homeless supports. In 2021, we provided emergency accommodation to 31 individuals aged 61 years and over. 10 of these individuals were accommodated for over 6 months consecutively or cumulatively in a 12-month period. Suitable, age-appropriate, localised responses to homelessness for older people currently reliant on homeless hostels and B&B placements are needed. When an older person enters homeless accommodation, timelines need to be put in place to ensure their time living in emergency accommodation is short. The establishment of an 'Older Persons Homeless Action Team' involving the local authority, HSE and relevant NGOs to prepare dedicated support plans and to ensure that each older homeless person has a dedicated key worker<sup>31</sup> would be an important part of the response to homelessness in Galway City over the coming years as homelessness in this older age cohort will likely continue to increase as our older population grows.

Other recommendation made in our recent submission on the Western Region Homeless Action Plan that need to be considered in relation to Homelessness and the City Development Plan are:

### Homelessness

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<sup>31</sup> Recommended by Focus Ireland. See Focus Ireland (2018) Focus Ireland Launches Campaign As Number of People Aged 65+ Who Are Homeless Has Shot up 40% in the Last Two Years Available at <https://www.focusireland.ie/pressrelease/focus-ireland-launches-campaign-as-number-of-people-aged-65-who-are-homeless-has-shot-up-40-in-the-lasttwo-years/> Accessed 27/02/2022

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- Increase number of social and affordable housing options.
- Increase funding for Tenancy Sustainment and Resettlement Services.
- The Recognition of the criticality of Inter-Agency Cooperation in addressing Homelessness.
- Work with relevant agencies to identify young people at risk of Homelessness.
- Establish an Older Persons Homeless Action Team.
- Support for Rough Sleepers and Individuals with Complex Needs.
- Increase the number of emergency beds available. Any increase should not include dormitory style accommodation but instead need to be single occupancy, ensuite rooms.
- Ensure approval for homeless accommodation is based on definition in Housing Act 1988
- Increase number of one-bedroom units for Housing First; continue to utilise two-bedroom accommodation until number of one-bedroom accommodation has increased. Two-bedroom accommodation must also be considered for single people who have overnight access to their children.
- Introduce a Housing First for Youth Program.
- Any new emergency accommodation must be designed to ensure easy conversion into permanent housing, reflecting a commitment that homelessness can be ended.
- Increase the number of community-based housing options for single people experiencing homelessness, who have little or no support requirements.
- Begin reducing reliance on Family Hubs and Tourist accommodation, begin by introducing a Housing First for family's pilot and sourcing suitable accommodation to provide own door responses to family homelessness.
- Provide funding for suitable age-appropriate localised responses to homelessness for older people currently reliant on homeless hostels and B&B placements.

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- Ensure every person who enters emergency accommodation is provided with a support plan focused on a speedy transition out of homelessness.

#### Youth Homelessness

- Collaborate with other relevant agencies to identify young people at risk of facing homelessness when they reach adulthood.
- Ensure all young people at risk of facing homelessness or who are leaving state care when they reach adulthood have an open social housing needs assessment.
- Ensure no young person spends more than two weeks in Homeless Emergency Accommodation.
- Work with other agencies to provide independent mediation to families where a young person's accommodation may be at risk.
- Ensure Young Families are provided with own door accommodation to minimise the impact on parenting while homeless. Families and Children
- Provide own door accommodation to families experiencing Homelessness.

#### **Older People**

As everyone's abilities change as we transition through life, it is important that our environment is adaptable. COPE Galway welcomes the drafts policy objectives to "Encourage the promotion of universal design principles and lifetime adaptability in the design and layout of residential developments"<sup>32</sup> as well as "Proactively promote the various aims of the Council to give effect to the Barcelona Declaration and support universal design principles to make Galway a more accessible and disability friendly city"<sup>33</sup> and also "Prioritise the safe movement of people on streets and create a high quality environment

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<sup>32</sup> Draft Galway City Development Plan 2023-2029 77

<sup>33</sup> 190 Draft Galway City Development Plan 2023-2029

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through design promoting connectivity, accessibility and the principles of universal design”<sup>34</sup>.

COPE Galway recommends that the draft include commitments that all newly constructed social housing units be designed using universal design principles and lifetime adaptability.

As we mentioned in our original submission and highlighted again earlier, we are concerned about the concentration of older people in complex supports needs, making it difficult for residents to support each other as a thriving resilient community should and we welcome policy objective; “Support the specific housing needs of older people including independent living options as well as semi-independent living options and nursing home accommodation. These facilities should be preferably accommodated within established neighbourhoods and at locations that have good access to community facilities and amenities”<sup>35</sup>. We also recommended that Housing options that give older people the opportunity to downsize while continuing to live in their own community should be included in the Development Plan and welcome the inclusion of Policy 3.1.10; “Enable older people to continue to live in their own homes, through adaption where necessary or a home more suitable to their needs through rightsizing”<sup>36</sup>. In our previous submission to the Development Plan we made a number of recommendations in relation to older people and their housing solutions that we feel need to be highlighted again;

- With the provision of any new social housing the adaption for the utilisation of smart technology to support older people to continue to live in their communities must be included.

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<sup>34</sup> Draft Galway City Development Plan 2023-2029 217

<sup>35</sup> Draft Galway City Development Plan 2023-2029. 65

<sup>36</sup> Draft Galway City Development Plan 2023-2029. 65

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- Along with the provision of housing, adequate levels of response must be provided to ensure when issues regarding maintenance and heating arise, they are dealt with quickly.
- Along with the provision of housing, the health and well-being of its residents is important and with this the Coordination of services for vulnerable older people needs to be prioritised.

COPE Galway welcomes the Draft commitment to “supporting the development of healthy and active communities, where there are opportunities for the whole community to be healthy and active at all life stages”<sup>37</sup>. COPE Galway as an organisation recognises the strengths that all those we work with. We feel that any Development Plan must recognise and promote the strengths within Galway’s diverse range of communities. COPE Galway feel that focusing on and recognising individuals, families and communities’ strengths promotes empowerment and self-determination and provides an opportunity to build hope and trust in individuals own expertise, abilities, interests, and strengths, and can further promote the positive aspects of being active and healthy.

It is also important to highlight that in order to ensure healthy and active lifestyles for our older people, particularly for our more vulnerable older people, coordination between services is needed. COPE Galway recommends the Development Plan include commitments to provide for the coordination of services for vulnerable older people, focused on ensuring they can participate in community life and live in accommodation that is of a suitable standard.

### **Domestic Violence**

COPE Galway wishes to acknowledge the Draft Development Plans objective, “Support service providers in the provision of domestic violence refuges in the city”<sup>38</sup>. We note that

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<sup>37</sup> Draft Galway City Development Plan 2023-2029. 189

<sup>38</sup> Draft Galway City Development Plan 2023-2029 67

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this is listed under the drafts Housing Strategy. COPE Galway wish to highlight that in relation to social housing and access to emergency homeless accommodation, not having a local connection or satisfying habitual residency conditions ,while not a barrier to accessing domestic abuse services, are barriers that some households face when attempting to access homeless and housing services. COPE Galway wish to make it clear that access to domestic violence refuges in Galway City should not be based on satisfying similar conditions and should only be based on a woman's right to safety and refuge.

In more practical ways to help, in our recent submission to the Western Regional Homeless Action Plan we noted that in 2021, COPE Galway Domestic Abuse Service had 126 admissions to their refuge, 58 of those being women with children. One-third of these were local authority tenants, with the majority of the remainder having open housing applications at the point of admission. Challenges faced by these women include difficulty in returning to their home where they continue to be at risk of violence, fear of rendering themselves homeless, and the process associated with separating themselves from their partner's housing applications and tenancy. Any one of these issues is challenge enough, but in the context of an abusive and controlling relationship, the stakes are higher and the options for resolution more difficult to find. The following options could provide support to women in these situations and are worthy of exploration:

- Where a local authority tenancy exists, and an order from the court has been granted, the local authority should consider the potential of deeming this an anti-social behaviour and consider whether the abuser forfeits the right to the tenancy. In effect, this means the abuser must leave the home, as opposed to the current situation whereby the victim and children (also victims) are at risk of homelessness.
- Where a joint housing application is in play, that the process of separating applications is streamlined and easy to access so that a woman and her children may move on alone

COPE Galway would like these recommendations taken into consideration.

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## **Implementation and monitoring**

COPE Galway is concerned that Implementation and Monitoring makes up only 3 pages of the 351 page draft Development Plan. The Draft states that “A methodology that affords measurable monitoring and analysis and an allied reporting structure will allow for a review of the effectiveness of the Plan over the period of six years”<sup>39</sup>. However the methodology to be used is not described, further on the Draft states that a “Core Strategy Monitoring Framework will be activated”<sup>40</sup> and while it states housing growth will be a KPI, there is very little description and information regarding the methodology of this framework. COPE Galway recommends that every effort is made to ensure that the objectives of the plan follow the SMART approach (Specific, Measurable, Achievable, Relevant and Time-bound). COPE Galway notes that a two-year progress report will be prepared which must also include a review of the progress in implementing the housing strategy<sup>41</sup>. We note that the Chief Executive may recommend that the Housing Strategy and Development plan be adjusted, if the progress report indicates new or revised housing needs. As there is a possibility that the plan may be adjusted, COPE Galway recommend that public consultations take place during the review process and feedback be provided prior to any adjustment.

COPE Galway also notes that the draft states funding opportunities will be pursued to support implementation of the plan<sup>42</sup>, COPE Galway is concerned that aspects of the plan may not be implemented if they are dependent on sourcing funding.

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<sup>39</sup> Draft Galway City Development Plan 2023-2029. 327

<sup>40</sup> Draft Galway City Development Plan 2023-2029. 327

<sup>41</sup> Draft Galway City Development Plan 2023-2029. 328

<sup>42</sup> Draft Galway City Development Plan 2023-2029. 329

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