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Access to Autonomous Housing for Beneficiaries of International Protection in Ireland

KEIRE MURPHY AND AMY STAPLETON



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ABBREVIATIONS

NB: see Box 1.1 on pages 2–3 for definitions.

AHB	Approved housing body
BIP	Beneficiary of international protection
BOTP	Beneficiary of temporary protection
CCMA	County and City Management Association
DCEDIY	Department of Children, Equality, Disability, Integration and Youth
DHLGH	Department of Housing, Local Government and Heritage
DRHE	Dublin Regional Homeless Executive
DSP	Department of Social Protection
EEA	European Economic Area
EMN	European Migration Network
ETHOS	European Typology of Homelessness and Housing Exclusion
EU	European Union
HAP	Housing Assistance Payment
HNDA	Housing need and demand assessment
HSE	Health Service Executive
IPA	International protection applicant
IPAS	International Protection Accommodation Service
IPO	International Protection Office
IRC	Irish Refugee Council
JRS	Jesuit Refugee Service
LAIT	Local Authority Integration Team
LGMA	Local Government Management Agency
MENA	Middle East and North Africa
NCP	National Contact Point
NGO	Non-governmental organisation
PPSN	Personal public service number
RAS	Rental Accommodation Scheme
RTB	Residential Tenancies Board
UK	United Kingdom
UNHCR	United Nations High Commissioner for Refugees

EXECUTIVE SUMMARY

Housing plays a key role in the integration of beneficiaries of international protection (BIPs; see Box 1.1 for a definition). However, past research has shown that in practice BIPs often face significant barriers in accessing housing, with many countries providing supports to access autonomous housing as a result of this. These barriers pose a challenge for BIPs, who can find themselves with limited options to exit institutional or homeless accommodation, as well as for reception systems, which require outflow to accommodate new applicants. Understanding the challenges, barriers and good practices is therefore a crucial element of the governance of accommodation of international protection applicants (IPA) in Ireland, as well as the integration of BIPs. However, there is limited recent research on the policies and supports in place for this group, their outcomes, and the challenges and barriers faced.

This report considers the situation of those who arrived in Ireland, applied for international protection and were granted this status. Applicants for international protection, beneficiaries of temporary protection (BOTP) fleeing the conflict in Ukraine, resettled refugees, and other third-country nationals residing in Ireland are outside of the scope of this study. The report is based on desk research, interviews and stakeholder consultation.

The research found that BIPs face significant challenges and barriers in trying to access autonomous housing, and that these have resulted in almost 6,000 people with status remaining in International Protection Accommodation Services (IPAS) accommodation as of January 2024. One of its key findings is that some major challenges are actually mainstream issues not specific to this group. Examples include severe shortages in the supply of social housing and affordable rental housing, inadequacies in supports such as the Housing Assistance Payment (HAP), a lack of resources and high staff turnover among frontline workers in public services, and a lack of coordination or communication between different agencies or departments.

Alongside these mainstream issues, and reflecting recent European comparative research (EMN, 2024), this study also found that BIPs experience additional challenges and barriers. In Ireland, these include language barriers and a lack of knowledge or information about the system, psychological issues arising from their background and the international protection system, and discrimination in the housing market. In addition, this study shows that many challenges in the Irish context arose from existing policies concerning this group, such as isolated reception centres, which impact on employment outcomes, mental health, access to services and social connections. Insufficient resources for transition services, the recent IPAS policy of issuing transfers to different centres, and a lack of monitoring

of the housing outcomes of BIPs once they leave IPAS accommodation also emerged as challenges. Other difficulties reported include a lack of knowledge or clarity within local authorities about the rights and entitlements of this group, as well as a lack of planning for families arriving through the process of family reunification.

POLICIES AND MEASURES TO SUPPORT ACCESS

This report identifies both mainstream supports and targeted supports for BIPs to access autonomous housing. Mainstream supports include social housing supports, and the criteria for access to these supports are outlined. The report also outlines the law and policy in relation to emergency homelessness supports, noting that BIPs living in IPAS accommodation who cannot find autonomous housing are not considered homeless by many local authorities and are not counted in Irish Monthly Homeless Reports.

There are no mechanisms to assess the adequacy of housing accessed by BIPs once they leave the IPAS system, as IPAS does not track BIPs after they leave. However, there are mainstream mechanisms in place to assess the adequacy of social housing and private rented accommodation.

Targeted supports have been put in place for BIPs trying to access autonomous housing. The Department of Children, Equality, Disability, Integration and Youth (DCEDIY) is responsible for migrant integration and accommodating international protection applicants through the IPAS system, and they provide some support services, such as meetings with BIPs to advise them of their options. DCEDIY have also commissioned Depaul and Peter McVerry Trust to support BIPs to transition into autonomous housing. However, non-governmental organisations (NGOs) highlighted the strains endured by and variable outcomes of this service due to the large number of people being supported by each caseworker. As of January 2024, there were approximately 185 BIPs (representing 112 households) living in IPAS accommodation per caseworker. Multiple other NGOs provide support, notably the Irish Refugee Council (IRC), Crosscare and Doras. However, many of these are concentrated in urban areas and there is therefore geographic discrepancy in terms of access to these additional specialist services.

Multiple forms of cooperation and collaboration between different actors working on the transition to autonomous housing for BIPs are identified in this report. However, some of these were found to be ad hoc and relationship-based, rather than a reflection of formal inter-agency or inter-departmental protocols. Gaps are identified.

Some stakeholders suggested that, due to its focus on integration from day one and on independent living, the approach outlined in the *White Paper to End Direct*

Provision and to Establish a New International Protection Support Service (published in 2021) may improve outcomes in relation to BIPs' transition to autonomous housing. However, in particular because implementation has been delayed, it is not yet clear what impact this might have. Secondly, many stakeholders felt that the DCEDIY-funded Local Authority Integration Teams (LAITs) – a permanent integration team within each local authority – could potentially play a role in improving coordination by acting as a formal support mechanism for linking in with state services.

CHALLENGES AND GOOD PRACTICES IN SUPPORT PROVISION

A number of challenges were found to hinder the provision of support to BIPs for accessing autonomous housing.

- A lack of resources and staff turnover: NGOs indicated that the number of people they are trying to support has grown significantly following increases in the number of international protection applications, and that they are managing this with the same, or even lower, staffing levels. Local authorities and other stakeholders indicated that a high rate of staff turnover, challenges with recruitment, and the relative novelty of this issue in Ireland all contribute to a dearth of relevant skills, which poses challenges for their provision of support.
- Administrative barriers: These include this issue falling between IPAS and local authorities' mandates in some situations, as well as a lack of clarity on the rights and entitlements of BIPs among frontline workers in local authorities.
- A lack of coordination/communication between actors was noted in relation to this group.
- Inconsistency was highlighted in the approaches of different local authorities, with practices differing widely across them.
- Some issues were flagged in relation to the inclusion of this group in long-term planning of housing needs.

Good practices identified included the planned policy developments mentioned previously (the *White Paper to End Direct Provision*, and the introduction of the LAITs). In addition, the inter-departmental working group set up for BOPs was identified as a good practice, as was a multiagency/multistakeholder approach to the issue, such as the approach taken towards resettled refugees or BOPs. Community integration forums and increased sharing of data between DCEDIY and local authorities were also highlighted as examples of good practice due to their role in improving coordination between key stakeholders.

ACCESS: OUTCOMES AND BARRIERS

Data over time on BIPs in IPAS accommodation indicate the difficulties that BIPs have in accessing autonomous housing and moving on from IPAS accommodation;

approximately 22% of people in IPAS accommodation in January 2024 had been granted status. This is a significant increase from 2020, when around 14% of those in IPAS accommodation had status.

In addition, IPAS data suggest that the majority of those with status in IPAS accommodation have had it for less than two years, indicating that many are able to move on, eventually. However, most NGOs interviewed suggested that BIPs do not have meaningful access to autonomous housing, as they face significant barriers and challenges in the current housing market in Ireland, particularly in recent years.

There are limited data available on the adequacy of available housing. However, some stakeholders reported issues with the adequacy of housing for BIPs, including poor standards of housing, housing not meeting the needs of BIPs, and low-quality or insecure tenancies. This supports previous Irish research, which found lower quality housing among migrants in general (McGinnity et al., 2022).

Barriers to access

Most of the barriers identified in this research relate to the mainstream housing market, the system for housing, the integration of BIPs and the limitations of available supports. Others related to the characteristics of BIPs. The following barriers were identified.

- The housing market, and a lack of supply of social housing and affordable private rental housing, was identified as the primary barrier for BIPs trying to access autonomous housing.
- The inadequacy of mainstream and targeted support services emerged as another problem. Related issues include the very low availability of properties within HAP rental limits, delays with the homeless HAP system, the need to make top-up payments to HAP, a lack of translation services in frontline supports, and overstretched targeted supports. Administrative barriers were also flagged, in particular a lack of clarity among frontline workers in local authorities regarding the rights, entitlements and exemptions of BIPs.
- Services were found to be overburdened, with significant pressure on many government housing-related services, such as social housing, frontline support workers, and homelessness services. This is associated with a subsequent high level of competition for public services, which disadvantages those facing additional barriers to access.
- Discrimination by landlords was also highlighted; this was found to be based on the individual's ethnicity, immigration status, HAP status and the fact they were coming from IPAS accommodation.
- Language barriers also emerged, as well as a lack of access to information and social networks.

- Psychological issues were identified as a potential barrier. These can be caused by traumatic experiences before arrival in Ireland, as well as post-migration stressors, such as insecure residency, long delays in the international protection process and the IPAS accommodation system.
- Issues also emerged around family reunification, in particular in relation to a lack of planning on this issue, which stakeholders indicated can cause BIPs who have accessed autonomous housing to fall into homelessness.
- IPAS's policy of transferring BIPs who have had status for one to two years to a new location was noted to sometimes disrupt factors that can facilitate a BIP's search for autonomous housing – such as their employment, access to services and education and social networks.
- The digitalisation of services can create barriers for BIPs who struggle with language barriers, literacy, and low technological literacy.
- The dispersal system can contribute to barriers, as a result of a lack of long-term strategic planning or consideration of available housing, employment or services in an area.
- While the length of the protection process can have a negative psychological impact and can create dependency, which are potential challenges for those trying to move into autonomous housing, it can also lead to BIPs becoming integrated and building a community within the local area of their accommodation centre. If housing is very limited in that area, this can pose a challenge regarding their ability or willingness to access housing where it is available; it can also lead to disruption of social networks, education, employment, etc. if they have to leave the area to access housing.
- Emergency homeless accommodation services can provide support to BIPs and their families, but there can be barriers to accessing such services.

Good practices and responses to these challenges were also identified by stakeholders consulted: in-depth casework and advocacy supports; the wraparound services provided to resettled refugees; the prior practice of making personal public service number (PPSN) appointments for people arriving through family reunification before their arrival in the State; and facilitating BIPs to make in-person appointments when submitting social housing applications. In addition, stakeholders highlighted the importance of programmes that build social capital and resilience and that link BIPs with education and employment opportunities.

POLICY IMPLICATIONS

This report has several significant policy implications, with stakeholders consulted making multiple recommendations to improve access to autonomous housing for BIPs. One of the main policy implications relates to a wider, mainstream issue of housing capacity, which echoes the key challenges found in the wider European comparative study on the topic (EMN, 2024). A central implication for Ireland is the need for improved supply of social housing and affordable rental housing, as well

as proactive inclusion of IPAs/BIPs in housing frameworks, alongside a built-in flexibility in responding to fluctuating numbers. Moreover, there is need for a multi-agency approach to the provision of wraparound integration supports and services for BIPs, with the potential role of the new LAITs in coordinating this approach highlighted by multiple stakeholders. The importance of increased resourcing of targeted housing supports for BIPs was also stressed, in light of a growth in numbers and challenges in the current housing market. Several stakeholders highlighted the need to move towards a strategic, long-term approach in relation to the geographical location of reception centres for IPAs and to think about the long-term future of BIPs when they have been granted status.

Other key policy implications include the need for capacity building for and communication with frontline staff in local authorities on the needs and entitlements of BIPs, and the need to provide additional resources to frontline services, so that they can effectively meet the needs of disadvantaged groups. The need for formal coordination protocols between actors, and improved planning and coordination for family reunification, are also highlighted.

The study shows a lack of available data for monitoring this potentially vulnerable group in the housing market, with no mechanism for tracking BIPs once they leave IPAS accommodation. Specific mechanisms for gathering the data could enable a better understanding of how to improve outcomes for this group, as well as to tackle vulnerabilities that arise following exit from IPAS accommodation.

CHAPTER 1

Introduction

Housing plays a key role in the integration of beneficiaries of international protection (BIPs). The importance of housing in supporting beneficiaries of international protection to live independently has been emphasised in the *White Paper to End Direct Provision and to Establish a New International Protection Support Service* (DCEDIY, 2021).¹ Housing enables individuals to begin to build a stable life and can improve other dimensions of integration, such as social connections, employment, health and education (Ager and Strang, 2008). Significant challenges can be faced in settling into a community without safe, adequate and stable housing, which is needed to begin the process of establishing a normal life after displacement and accessing basic state services. In recognition of this, the 1951 Refugee Convention guarantees refugees treatment at least as favourable as nationals in relation to housing, as does the European Union's (EU) 2011 Qualification Directive.²

EU Member States are required to provide material reception conditions for international protection applicants (IPAs, often referred to as asylum seekers) for the duration of their procedure, under the Reception Conditions Directive.³ They are required to ensure that the material reception conditions provide an 'adequate standard of living for applicants, which guarantees their subsistence and protects their physical and mental health'.⁴ Many Member States, including Ireland, provide accommodation directly as part of the provision of material reception conditions (EUAA, 2022). However, once individuals are granted status (and become BIPs, the focus of this report), they lose their entitlement to these reception conditions under the Reception Conditions Directive.⁵ They therefore must arrange their own housing (referred to as 'autonomous housing' throughout this report). The term autonomous housing includes housing provided by the State outside of the international protection reception system, housing partially funded or supported by the State, and completely private housing. While the need to provide specialised support services to enable beneficiaries to move from institutional accommodation into autonomous housing has been recognised by many countries (EMN, 2024), European law makes no explicit provision regarding the right to or scope of these services.

Past research has shown that BIPs often face significant barriers accessing housing once they receive their status (Bieri, 2024; Ní Raghallaigh et al., 2016). These

¹ Hereafter in this chapter this is referred to as the *White Paper to End Direct Provision* for brevity.

² Directive 2011/95/EU, <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:337:0009:0026:en:PDF>.

³ Directive 2013/33/EU.

⁴ Article 17(2).

⁵ See EMN (2024). *Access to autonomous housing for beneficiaries of international protection*, EMN Inform; and EMN (2024). 'Ad hoc query 2024.15' for information on EMN Member Countries' practices in relation to reception conditions once IPAs receive status.

barriers to housing form a challenge both for BIPs who are then effectively trapped in institutional or homeless accommodation, and also for reception systems. A lack of outflow from centres has been identified as a significant challenge for capacity management in reception systems across Europe (EMN, 2023).

Understanding these challenges and barriers, as well as good practices, therefore comprises a crucial element of governance in relation to accommodation for IPAs in Ireland, as well as the integration of BIPs. This study aims to shed light on BIPs' ability to access autonomous housing in Ireland, barriers to their doing so, and government policy on this matter.

This report considers the situation of those who have arrived in Ireland, applied for international protection and been granted status. IPAs, BOTPs, resettled refugees and other third-country nationals residing in Ireland are outside of the scope of this study.

BOX 1.1 DEFINITIONS

Beneficiary of international protection (BIP): A person who has been granted refugee status or subsidiary protection status (EMN, n.d.), after applying for international protection in the country. This group comprises the focus of this study.

Resettled refugee: A refugee who is identified by the United Nations High Commissioner for Refugees (UNHCR) and who is transferred from the country in which they have sought protection to a third state, which has agreed to admit them as a refugee with refugee status (EMN, n.d.). In Ireland, resettlement is conducted through the Irish Refugee Protection Programme.

International protection applicants (IPA): A third-country national or a stateless person who has made an application for international protection in respect of which a final decision has not yet been made.

Beneficiary of temporary protection (BOTP): A person who has been granted protection according to Directive 2001/55/EC (Temporary Protection Directive). Temporary protection is an exceptional measure to provide immediate and temporary protection in the event of a mass influx or displaced persons from non-EU countries who are unable to return to their country of origin. It requires a decision by the European Council to trigger the Directive, and it was triggered for the first time in response to the Russian invasion of Ukraine on 24 February 2022 for people fleeing the war in Ukraine.⁶ Beneficiaries of temporary protection are excluded from this study (see Stapleton and Dalton, 2024 for more information on BOTPs in Ireland).

Autonomous housing: A housing solution different from accommodation provided in the context of material reception conditions. Autonomous housing includes any

⁶ See https://home-affairs.ec.europa.eu/policies/migration-and-asylum/common-european-asylum-system/temporary-protection_en.

housing within the housing market for which beneficiaries of international protection may have received support from European Migration Network (EMN) member and observer countries (e.g. financial support or in-kind support), but that are not directly provided by the countries in the context of material reception conditions. Public housing (i.e. social housing) provided outside the context of material reception conditions – as part of mainstream policies addressed to the general population – is also included under the definition of autonomous housing (EMN, 2024).

Material reception conditions: Subsistence support provided to an applicant for international protection consisting of housing, food and clothing, in kind or as financial allowances or in vouchers, and a daily expenses allowance. On an EU level, this is regulated by the Recast Reception Conditions Directive 2013/33/EU, and in Ireland by the European Communities (Reception Conditions) Regulations 2018.

Homelessness or housing exclusion: The study takes the definition of homelessness provided within the Housing Act 1988:

(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.⁷

However, the research also acknowledges the European Typology of Homelessness and Housing Exclusion (ETHOS) which breaks down the phenomenon into four key categories: rooflessness, houselessness, insecure housing and inadequate housing (Feantsa, n.d.). See Appendix 1 for an illustration of these categories.

1.1 BACKGROUND AND POLICY CONTEXT

1.1.1 Policy context: Reception system for IPAs

IPAs are entitled to reception conditions under the European Communities (Reception Conditions) Regulations 2018. This entitles them to accommodation, among other material reception conditions. In Ireland, IPAs are housed by the International Protection Accommodation Service (IPAS), a division of the Department of Children, Equality, Disability, Integration and Youth (DCEDIY).

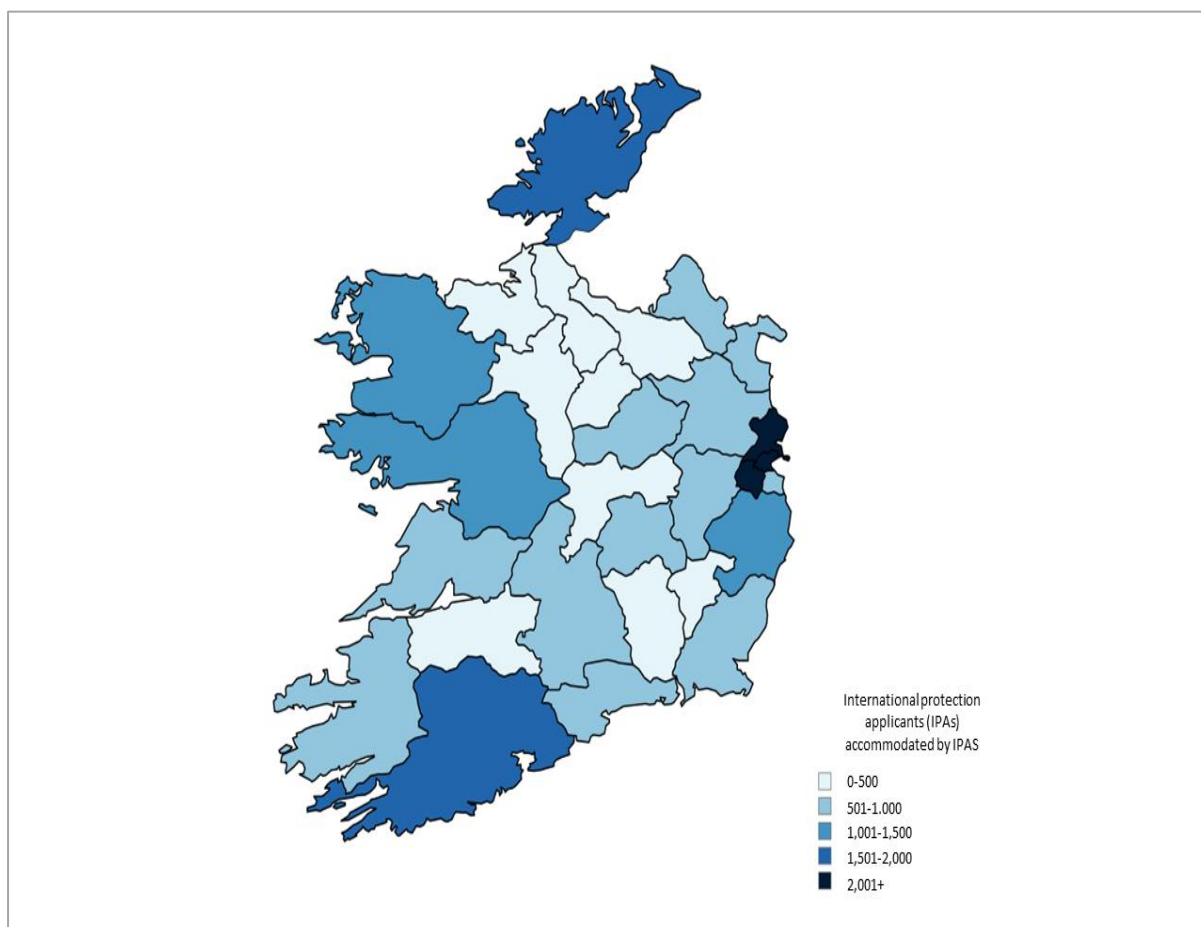
Since the late 1990s, Ireland has operated a ‘direct provision and dispersal’ policy for providing accommodation to international protection applicants. Under this

⁷ The Housing Act 1988 (Act No. 2/1988) (Ir.), <https://www.irishstatutebook.ie/eli/1988/act/28/enacted/en/html>.

policy, asylum applicants were housed directly by the Government, almost entirely through contracts with private providers, and were provided with full board, in various locations around the country. These locations were largely determined by open tenders for private providers of accommodation (Ní Chiosáin, 2018). See Figure 1.1 for the resultant concentration of IPAs in each local authority.

Figure 1.1 shows the locations of IPAs through Ireland. IPAS for the most part accommodates IPAs through contracts with private providers.

FIGURE 1.1 INTERNATIONAL PROTECTION APPLICANTS ACCOMMODATED BY IPAS AS OF 11 FEBRUARY 2024



Source: IPAS (2024). 'IPAS weekly accommodation and arrivals statistics', 11 February 2024, www.gov.ie.

Figure 1.1 shows that IPAs are quite dispersed around Ireland, although with higher concentrations in and around Dublin, Mayo, Donegal and Galway city. Due to the nature of the procurement process used for accommodation (particularly emergency accommodation), many IPAs end up in areas with short-term accommodation from the tourism industry.⁸

Following significant and sustained criticism of this system of accommodation, in 2021 the Irish Government published the *White Paper to End Direct Provision*,

⁸ Interview with local authority representative 2, December 2023.

which outlines a new model for reception of IPAs (DCEDIY, 2021). That model was based on the principle of integration from day one and proposed ending long-term institutional accommodation for IPAs. Under it, applicants would be housed in purpose-built reception centres for four months, where they would receive vulnerability assessments and a range of orientation and integration supports before being moved into own-door accommodation in the community. One of its principal proposals is a move away from private providers of accommodation towards a state-owned, professionalised approach that increased independence and integration.

However, this white paper, which was due to be implemented by the end of 2024, was delayed due to the significant increase in IPAs to Ireland in 2022 and 2023 (see Section 1.1.2), which occurred at the same time as a large number of people arrived from Ukraine.⁹ This increase placed significant pressure on the Department's capacity to source viable accommodation for new arrivals in 2023. This context led to recognition that the underlying assumptions on which the white paper was based needed to be re-examined; the model it outlined was based on the assumption there would be 3,500 new arrivals each year. A review of the implementation approach for the white paper was therefore initiated; this has included inputs from the White Paper Programme Board and the External Advisory Group (see Section 2.3.1).

As a result of this review process, the new Comprehensive Accommodation Strategy was published in March 2024. This strategy maintains the principles of the white paper and aims to set up a system with capacity for 35,000 people through a blended model (both state-owned and commercial providers) by 2028. Under this new strategy, 14,000 state-owned beds will be delivered by 2028 – quadruple the previous commitment under the white paper. This will be supplemented, as required, by high standard commercial providers. Under this strategy, those granted status would be able to remain in accommodation centres for a specified time following the grant of status (currently 12 months) (DCEDIY, 2024). DCEDIY has implemented parts of the white paper, including the acquisition of properties for supported accommodation for vulnerable applicants, increasing state-owned accommodation capacity, the development of an integration programme, and commissioning non-governmental organisations (NGOs) to provide targeted supports.¹⁰

Once an IPA is granted status, they become a BIP and are no longer entitled to reception conditions and IPAS accommodation. However, the significant increase in numbers, the challenges faced by BIPs in accessing autonomous housing, and

⁹ DCEDIY (2023). 'Response to parliamentary question 17371/23', 18 April, <https://www.oireachtas.ie/en/debates/question/2023-04-18/1249/>.

¹⁰ DCEDIY (2023). 'Response to parliamentary question 17371/23', 18 April, <https://www.oireachtas.ie/en/debates/question/2023-04-18/1249/>.

IPAS' policy to not evict BIPs into homelessness have together resulted in BIPs staying in IPAS accommodation for long periods once they get their status. There may also be a financial incentive for people to stay on in IPAS accommodation for an extended period, considering the scarcity of affordable housing, the high cost of living and the challenges in entering the housing market, alongside the non-implementation of the contribution policy in IPAS accommodation.¹¹

In 2023, IPAS began to transfer those BIPs who had been residing in reception centres with status the longest periods of time to emergency accommodation, often far from where they had been residing.¹² This measure was adopted in response to the significant strain on their services (see Section 1.1.2 below) and with the aim of creating vacancies in reception centres for incoming arrivals.¹³ This policy continues to be implemented; IPAS currently has a timeline of approximately 24 months for families and 12 months for single adults before they are moved, but this is not a hard line and varies significantly.¹⁴ Where somebody refuses the transfer, they then lose their place in IPAS accommodation.

¹¹ Correspondence with UNHCR, March 2024. The contribution policy refers to the ability of IPAS to charge residents who are earning income under section 5 of the European Communities (Reception Conditions) Regulations 2018 S.I. 230/2018, which has not been operationalised; interview with IPAS, January 2024.

¹² Interview with the IRC, December 2023; Interview with Nasc, November 2023; DCEDIY (2023). 'Response to parliamentary question 31547/23', 28 June.

¹³ DCEDIY (2023). 'Response to parliamentary question 31547/23', 28 June; interview with IPAS, January 2024

¹⁴ Interview with IPAS, January 2024; meeting with IPAS, February 2024.

BOX 1.2 EMERGENCY ACCOMMODATION TERMINOLOGY

Throughout this report, two forms of emergency accommodation are regularly referenced. The first of these is emergency homeless accommodation administered by local authorities. This form of accommodation includes private emergency accommodation (hotels and B&Bs where supports are provided to services users on a visiting supports basis); supported temporary accommodation (accommodation, including family hubs, hostels, with onsite professional support); and temporary emergency accommodation (emergency accommodation with no/minimal support).¹⁵ Emergency homeless accommodation is administered by local authorities as per their powers under section 10 of the Housing Act 1988.

The second form of emergency accommodation referenced is emergency IPAS accommodation. This is IPAS accommodation that is used to accommodate IPAs in cases where IPAS reception facilities have no remaining capacity. This form therefore does not conform to the normal IPAS standards for reception facilities, and can also take the form of hotels, or even tents. As of 10 March 2024, there were 49 IPAS centres, 220 emergency accommodation centres, 1 national reception centre, 1 transit hub and 3 tented accommodation centres.¹⁶

While these two forms of accommodation can be similar in practice, they are administered by different government bodies with different conditions.

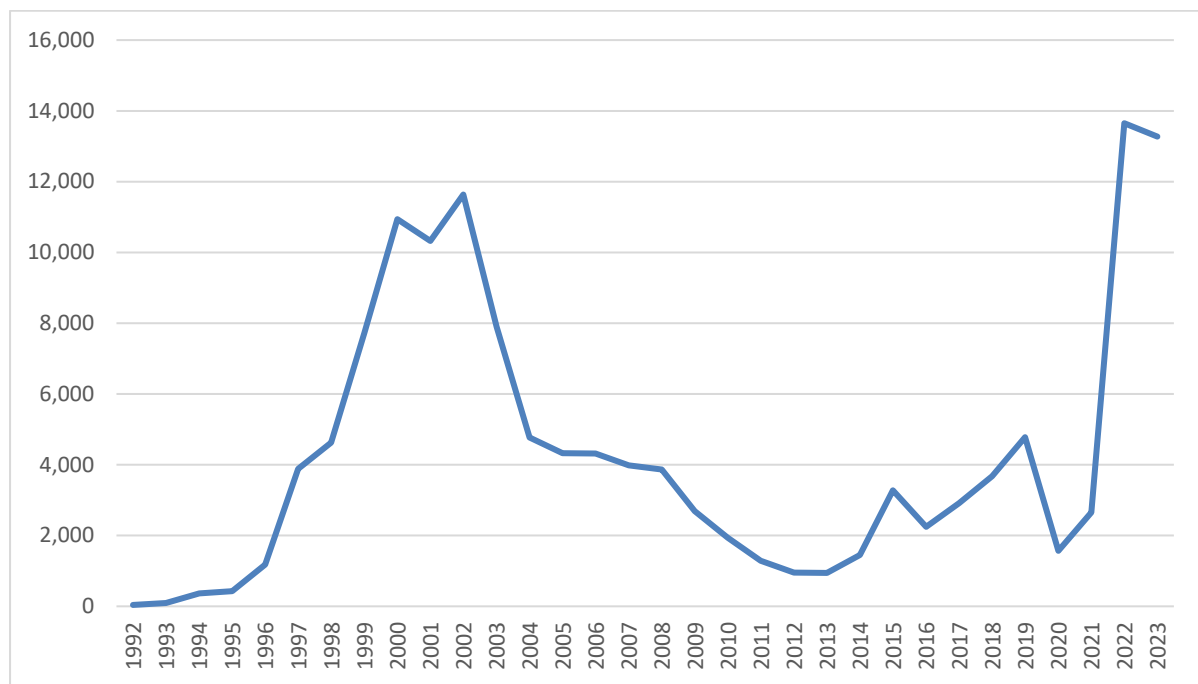
1.1.2 Migration context

Ireland has historically had relatively low numbers of IPAs, compared with other Western European countries. As in most other European countries, there has been significant fluctuation in applications. Ireland experienced a steep increase in applications from the mid-1990s until 2002, followed by a significant decrease (see Figure 1.2). While applications stayed quite low throughout the 2000s, and Ireland was noticeably not affected by the 2015–2016 increase in numbers that was experienced in other European countries, applications began to increase from 2017, until they were interrupted by COVID-19 travel restrictions. Subsequent to the lifting of these restrictions, there was a sharp increase in international protection applications. The year 2022 saw the largest number of applications in Ireland’s history, at 13,651 applications. This level continued into 2023 and is likely to be surpassed in 2024, based on current trends.¹⁷

¹⁵ Correspondence with DHLGH, April 2024.

¹⁶ IPAS (2024). ‘IPAS weekly accommodation and arrivals statistics’, 13 March.

¹⁷ See Department of Justice (2024). ‘International protection: March 2024’, <https://www.gov.ie/en/collection/48a28-international-protection-in-numbers/#>.

FIGURE 1.2 INTERNATIONAL PROTECTION APPLICATIONS IN IRELAND 1992–2023

Source: Office of the Refugee Applications Commissioner, 'Statistics', www.orac.ie/website/orac/oracwebsite.nsf/page/orac-stats-en; International Protection Office, 'Statistics', www.ipa.gov.ie/en/ipa/pages/statistics.

Note: NB: Beneficiaries of temporary protection (BOTPs) from Ukraine are not included in these statistics, as they are covered under a separate legal framework and fall outside the scope of this report.

The rise in applications led to significant pressure on the reception system, with the number of residents in IPAS increasing from around 8,600 in January 2022,¹⁸ to over 27,000 in February 2024 (DCEDIY, 2024). The system was already using emergency accommodation as a result of a modest increase in 2019 (see Sheridan, 2020), as well as the simultaneous arrival of around 100,000 Ukrainians, many of whom are also accommodated by DCEDIY (DCEDIY, 2024).¹⁹ Additionally, at several points since the increase, pressure on the system and a lack of available accommodation resulted in IPAS being unable to offer some applicants accommodation for a period of time, in contravention of their obligations under the European Communities (Reception Conditions) Regulations 2018.²⁰ As of 12 March 2024, 1,260 IPAs were awaiting an offer of accommodation.²¹

Research by the Economic and Social Research Institute (ESRI, Cunniffe et al., 2022) examined this increase, and concluded that multiple different factors were involved. These included global instability following the Russian invasion of Ukraine and COVID-19, and catch-up effects from COVID-19, both of which led to increases

¹⁸ Correspondence with DCEDIY, January 2024.

¹⁹ See <https://www.gov.ie/en/publication/9ac7b-accommodation-of-beneficiaries-of-temporary-protection-botps/>.

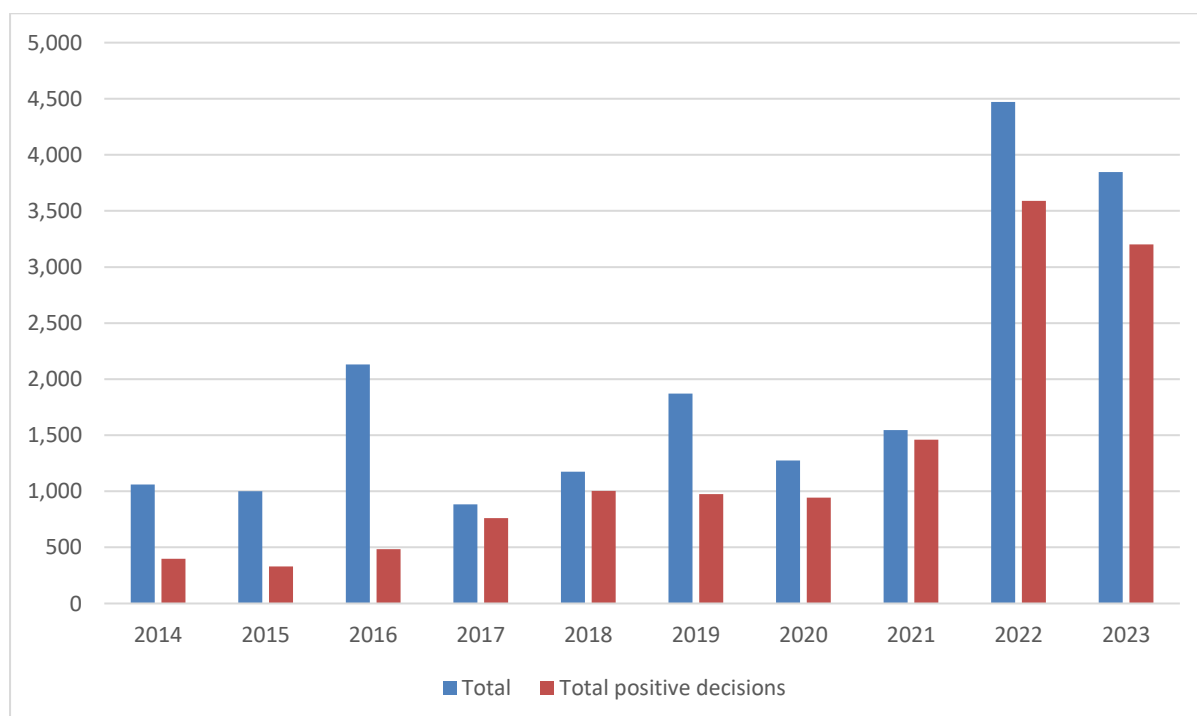
²⁰ S.I. No 230/2018; S.A and R.J v Minister of Children, Equality, Disability, Integration and Youth, Ireland and the Attorney General.

²¹ DCEDIY (2024). 'Statistics on international protection applicants not offered accommodation', last updated 27 February 2024, www.gov.ie. Last accessed 29 February 2024. Note that IPAs not offered accommodation are offered a temporary increase of €75 per week to their daily expense allowance.

in asylum applications in the EU overall. However, the report also noted that Ireland was seeing a larger increase than other EU countries and the United Kingdom (UK). The authors attributed this trend to a deflection effect from the UK for some nationalities, a long-term social network effect that Ireland was experiencing later than other countries as a result of a later migration transition, and increased secondary movements of BIPs from other countries. The report therefore concluded that the increase was unlikely to be temporary.

Another factor that has significantly added to the increased pressure on the system is the fact that there is a growing number of individuals with permission to remain in Ireland living in the IPAS accommodation system. Although BIPs are theoretically no longer entitled to IPAS accommodation (and reception conditions under the Reception Conditions Directive more generally) once they receive status, and are entitled to apply for mainstream social housing benefits, almost 6,000 people with status were living in IPAS accommodation at the end of January 2024.²² An IPAS representative indicated that the increase in BIPs living in IPAS accommodation was in part due to the increase in international protection applications, but also due to an increase in grants of applications (see Figure 1.3), resulting from investment in processing capacity in the International Protection Office (IPO).²³

FIGURE 1.3 TOTAL FIRST-INSTANCE DECISIONS AND POSITIVE FIRST-INSTANCE DECISIONS ON INTERNATIONAL PROTECTION APPLICATIONS IN IRELAND, 2014–2023



Source: Eurostat (2024). 'First-instance decisions on applications by citizenship, age and sex – Annual aggregated data', extracted 1 March 2024.

²² DCEDIY (2023). 'Response to parliamentary question 55182/23'.

²³ Meeting with IPAS representative, February 2024; Department of Justice (2023). 'Response to parliamentary question 18839/23', www.oireachtas.ie.

The simultaneous arrival of around 100,000 people fleeing the war in Ukraine,²⁴ many of whom are also accommodated by DCEDIY, has placed additional pressure on state bodies responsible for supplying accommodation. This situation is compounded by the constrained housing market.²⁵

1.1.3 Housing context

The Irish housing market is commonly characterised as being in a state of crisis. This can be attributed to multiple factors, including: significant increases in both rent and house prices since their nadir following the property crash in 2008 (RTB, 2023b; CSO, 2024); insufficient supply to meet structural demand over the last decade (Barrett and Curtis, 2024) resulting in severely limited availability in the private rental sector (Daft.ie, 2024); problems with housing affordability, particularly for some groups (Corrigan et al. 2019); and falling homeownership (Hearne, 2020; Slaymaker et al., 2022). In addition, a recent study by Disch and Slaymaker (2023) showed an increase in the proportion of young people living with their parents, as well as credit constraints faced by first-time buyers and significant reliance on government supports for rental affordability, something that comes at high cost to the State.²⁶

Many of the problems in the housing market date back to the property crash, fiscal crisis, and recession that Ireland experienced after 2008, and the subsequent bailout and austerity policies that were adopted (Folan, 2022).²⁷ These events resulted in a drop-off in both private development and the building of public housing, which led to a sharp decline in public housing supply in Ireland in the years that followed (see Disch et al., 2024).²⁸ An average of only 1,760 homes were added to the total housing stock each year between 2011 and 2016, compared with 75,000 between 2004 and 2008 (Folan, 2022). The decrease in public housing supply in particular led to an increased reliance on the private rental sector for the provision of social housing through rent supplement schemes (see Section 2.1.1.3).²⁹ The housing policy analyst interviewed as part of this study suggested

²⁴ Department of the Taoiseach (2024). 'Government approves changes to measures for those fleeing war in Ukraine', press release, www.gov.ie.

²⁵ Correspondence with the JRS Ireland, September 2023; Correspondence with the IRC, September 2023.

²⁶ The cost of HAP and RAS (see section 3.1) was €654 million in 2022; see Committee on Public Accounts (2023). 'Thursday, 26 October 2023: Official report', https://data.oireachtas.ie/ie/oireachtas/debateRecord/committee_of_public_accounts/2023-10-26/debate/mul@/main.pdf.

²⁷ Interview with housing policy analyst, December 2023.

²⁸ See also DHLGH, 2024, for two datasets: an overview of social housing activity 2004-2015 and a social housing overview 2016 to Quarter 4 2023.

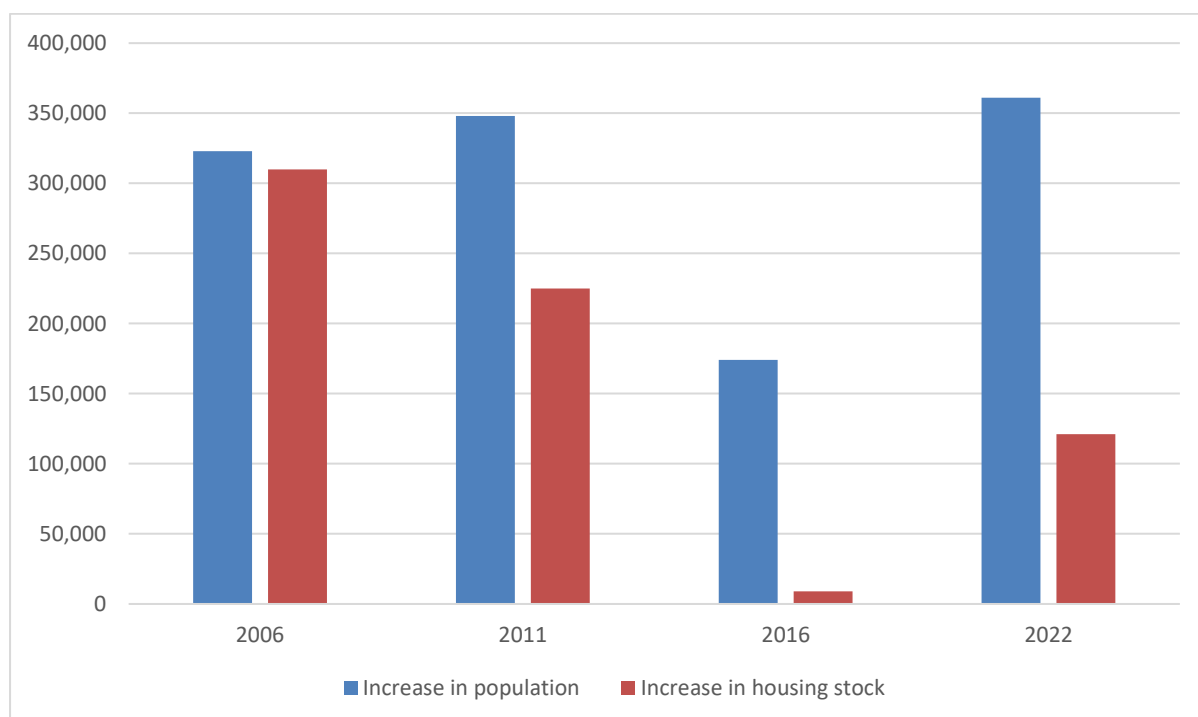
²⁹ Interview with housing policy researcher A, December 2023.

that the use of short-term rentals for tourism purposes may also be playing a role in the lack of supply of rental accommodation in certain areas.³⁰

In 2020, it was estimated that around 33,000 new homes each year are needed to keep up with population growth (Bergin and García-Rodríguez, 2020), which has exceeded growth of the housing stock for each Census period since 2006 (see Figure 1.4; Folan, 2022). Recent analysis has indicated that even if annual new housing stock figures do increase to this amount, such output may still be too low to address the backlog of demand (as opposed to new demand) (Disch et al., 2024). With population growth exceeding growth of the housing stock for each Census period since 2006, the gap between the two has therefore widened significantly (Folan, 2022).

This lack of supply, combined with increased demand, has led to significant increases in house prices, which has made housing in Ireland less and less affordable, while putting increased pressure on the rental sector. It has also led to record numbers of people in emergency homeless accommodation (Folan, 2022; Disch et al., 2024; Barrett and Curtis, 2024; see Figure 1.5).

FIGURE 1.4 CHANGE IN POPULATION AND HOUSING STOCK FROM PREVIOUS CENSUS PERIOD, 2006–2022



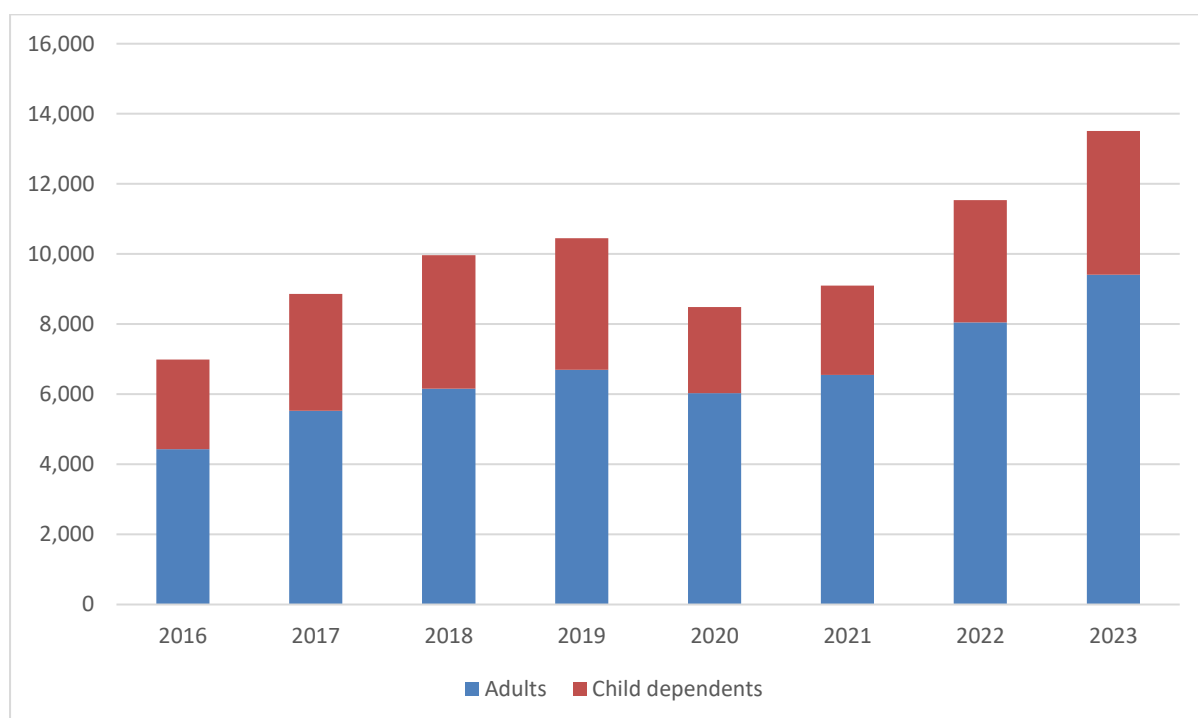
Source: Folan (2022), p. 5.

Structural supply issues have severely limited the amount of housing available on the rental market. Supply shortages are partly due to properties leaving the rental

³⁰ Correspondence with housing policy analyst, February 2024; see Joint Committee on Housing, Planning and Local Government (2017). 'The impact of short-term lettings on Ireland's housing and rental market', Houses of the Oireachtas 32/HPCLG/03; Surr, L. (2024). 'There are more than 18,000 houses to rent on Airbnb vs 2,000 on Daft. Something is very wrong', *Irish Times*, 28 February.

sector, and partly to a high demand for rental housing, due to tenants remaining in a property for longer than had been the case previously in part due to challenges faced by first-time buyers. Other factors include the increased use of private rental accommodation for those in receipt of long-term social housing supports (Slaymaker and Shiel, 2023), as well as higher than expected population increases (Barrett and Curtis, 2024). There were subsequent increases in the number of people (mainly families) in emergency homeless accommodation in 2022 and 2023, after decreases during the pandemic.³¹ Figure 1.5 below illustrates the number of people accessing local government funded emergency homeless accommodation in Ireland between 2016 and 2023.³² There is also some evidence to suggest that the COVID-19 pandemic may have worsened the problems of the housing market, with a plateau in new housing completions over 2020/2021 arising from delays in construction on many projects.³³

FIGURE 1.5 PEOPLE ACCESSING LOCAL GOVERNMENT EMERGENCY HOMELESS ACCOMMODATION IN IRELAND, 2016–2023



Source: DHLGH, November Homeless reports 2016–2023.

Note: These numbers refer to the number of people in local authority emergency accommodation under section 10 of the Homeless Act 1988.³⁴ While these figures are sometimes used as a proxy for homelessness, they do not capture everyone who may fit into the definition of homelessness in the Housing Act 1988 (see Section 2.1.3), but instead refer to those in a specific type of accommodation. They do not include other groups such as BIPs who have a right to leave IPAS accommodation but who cannot find a place to live.³⁵

The lack of housing supply has resulted in large increases in rent rates – with national average standardised rents almost doubling between 2014 and 2023 for

³¹ Correspondence with housing policy researcher B, March 2024.

³² Local government funded emergency homeless accommodation refers to accommodation provided under section 10 of the Housing Act 1988, which is administered by local authorities, primarily with funding from DHLGH.

³³ See CSO (2022). 'New dwelling completions: Quarter 4 2021', CSO Statistical Release, 27 January, www.cso.ie.

³⁴ Correspondence with housing policy researcher B, March 2024.

³⁵ Correspondence with housing policy researcher B, March 2024.

new tenancies.³⁶ House prices are now higher than they were at their peak during the 2007 property bubble, having increased by 143% since their lowest point in 2013 (CSO, 2024). Challenges to supply were also described in the Daft.ie (2023) report, which found that in quarter 2 of 2023, there were fewer than 1,000 properties available to rent nationwide on the Daft.ie website, representing one of the lowest totals since 2007 (albeit a slight improvement from 2022).³⁷ There is also insufficient supply of social housing,³⁸ with 22.3% of all households on social housing lists waiting for more than seven years in 2022 (The Housing Agency, 2023). These factors have contributed to large increases in homelessness, with a 20% increase year-on-year in the number of individuals accessing emergency accommodation (see Figure 1.5 above). The Monthly Homeless Report (which only captures people in local authority emergency homeless accommodation) shows that for the period 19–25 February 2024, 6,352 single adults and 1,994 families were accessing emergency accommodation (DHLGH, 2024).

In 2021, Housing for All, a new housing plan to 2030, was adopted (DHLGH, 2021). The overall objective of Housing for All is that every citizen in the State has access to a good quality home through a steady supply of housing in the right locations. The strategy sets out a range of measures to achieve its policy objectives together with a financial commitment of over €4 billion per year.

1.1.4 Legal context: Entitlements of BIPs

The criteria for international protection and entitlements for international protection beneficiaries in Ireland are laid out in the International Protection Act 2015. Section 53 of the Act sets out entitlements to certain rights for those who qualify for international protection under the Act. As well as the right to reside in the State, the right to enter employment and education, and travel to and from the State, section 53 (b) grants the right to receive the same medical care and social welfare benefits to which Irish citizens are entitled, upon the same conditions applicable to Irish citizens. Therefore, BIPs are entitled to social housing and housing supports upon the same conditions as Irish citizens (see Section 2.1.1.3 for further information on social housing). These rights are different from those granted to many other groups of migrants, who have a variety of restrictions to welfare entitlements and housing entitlements (particularly those on shorter-term permits; see Quinn et al., 2014; McGinnity et al., 2024; Stapleton and Dalton, 2024).

Sections 56 and 57 of the 2015 Act also give those who have been granted international protection the right to apply for their family members to enter and

³⁶ See RTB (n.d.). 'The RTB Q3 2023 New and Existing Tenancies Rent Index', Data Hub, www.rtb.ie/about-rtb/data-insights/data-hub.

³⁷ It should, however, be noted that many landlords do not advertise on the daft.ie website (Correspondence with housing policy researcher B, March 2024).

³⁸ Correspondence with Crosscare Refugee Service, October 2023.

reside in the State. Section 56 relates to family members who are outside the State, and section 57 relates to family members who are already in the State. Family members who are granted permission to enter and/or reside in the State are entitled to the same rights as BIPs (section 56(4), 57(4)). Family members included in the definition of family under the International Protection Act 2015 include a spouse or civil partner, unmarried children under 18 and parents where the sponsor is a child (section 56(9)). BIPs must apply for family reunification within 12 months of receiving their permission (section 56(8), 57(7)).

For family members who do not fall within this definition or for applications after 12 months, decisions are guided by the ‘Policy document on non-European Economic Area (EEA) family reunification’.³⁹ This document applies to all non-EEA family reunifications that are subject to ministerial discretion and is therefore not specific to BIPs.

BOX 1.3 DEPARTMENT HOUSING CIRCULAR 41/2012

Department Housing Circular 41/2012, which was issued in 2012, provides advice on the consideration of applications for social housing support from a non-Irish national. The Circular states that BIPs (granted ‘refugee, programme refugee, or subsidiary protection status’) are eligible to be considered for social housing support from the date of granting of such status on the same basis as an Irish citizen. It also specifies that they will have a ‘declaration of refugee/subsidiary protection status from the Department of Justice’, which is sufficient information to determine their eligibility on residence grounds. The Circular notes that a spouse/civil partner of a BIP is eligible on the same basis as the BIP, as are family members who have come through the formal family reunification process, through the Department of Justice. It states that other family members of refugees must be assessed on their own merits, in accordance with the guidance in the Circular for non-EU nationals.

It should be noted that this Circular predates the International Protection Act 2015, so the International Protection Act is not referenced in the Circular.⁴⁰ A Housing Agency representative interviewed as part of this study indicated the need to update the Circular.⁴¹ The Department of Housing, Local Government and Heritage (DHLGH) indicated that the Government intend to bring forward legislation in 2024 to underpin this policy, and that the General Scheme of the Housing (Miscellaneous Provisions) Bill 2024 was agreed by Government in January 2024.⁴²

1.1.5 Governance context: Who is responsible for supporting access?

The Department of Children, Equality, Disability, Integration and Youth (DCEDIY) is responsible both for accommodation for IPAs and for migrant and refugee

³⁹ Department of Justice and Equality (2016). ‘Policy document on non-EEA family reunification’, www.irishimmigration.ie.

⁴⁰ Correspondence with DHLGH, March 2024.

⁴¹ Interview with Housing Agency representative, January 2024.

⁴² Correspondence with DHLGH, March 2024 and April 2024.

integration, meaning that they play a crucial role in the transition of beneficiaries to autonomous housing. They also are the main funder of integration programmes/projects by NGOs to provide supports designed to facilitate access to autonomous housing. DHLGH is responsible for housing planning and delivery. Therefore the Department also has a role in defining overall housing policy, strategy and governance, which is highly relevant to this study as BIPs benefit from mainstream programmes and encounter problems in the general housing market. As DCEDIY's responsibility for accommodating people ends once they receive their status, and BIPs have the same housing rights as Irish citizens, DHLGH assumes responsibility for the housing of this group as part of mainstream housing policy. The Department of Social Protection (DSP) is responsible for the provision of income support (social welfare) and employment services, and therefore also plays a role.

Local authorities play a key role; as the local statutory housing authority, they administer social housing and housing support programmes, including the Housing Assistance Payment (HAP)/Homeless HAP (see Section 2.1.1.3), many of which are used by BIPs.⁴³ Approved housing bodies (AHBs) also play a role in the provision of affordable rented housing for people who cannot afford to pay private sector rents or buy their own homes.

NGOs and community groups often provide both formal and informal supports to beneficiaries seeking to access autonomous housing, in particular information provision and support with applications (see Section 2.2.3 for more details). During the relevant period, Depaul and the Peter McVerry Trust had DCEDIY-funded contracts for services specifically aimed at assisting persons with status to transition from IPAS accommodation into independent living (see Section 2.2.2).⁴⁴

1.2 PREVIOUS RESEARCH IN IRELAND

There is a paucity of research in Ireland that examines BIPs' access to autonomous housing. However, a small body of literature sheds light on the experiences of life in reception centres. This research has demonstrated the negative impact of (extended) stays in the Irish reception system on BIPs (Higgins et al., 2019), which has been argued as leaving them isolated, in a state of persistent impermanence and waiting (Healy, 2018; O'Reilly, 2018; Ní Raghallaigh and Thornton, 2017; Thornton, 2014). Living for extended periods in overcrowded, poor-quality, institutionalised settings (Bieri, 2024) and the prolonged uncertainty regarding decisions on their international protection status and related entitlements have also been found to negatively affect wellbeing (Bieri, 2024; Groarke and Arnold,

⁴³ Correspondence with JRS Ireland, September 2023.

2018). Thornton (2014) further highlighted the challenges that those residing in reception centres confront as a result of dispersal policies, such as the loss of support networks when many face a move to different areas with little or no choice about where they live (Thornton, 2014). More recent Irish research has stressed the importance of social networks both in relation to quality of life for BIPs and, more specifically, when they seek access to housing (Bieri, 2024; Finn and Mayock, 2021). Conversely, Higgins et al. (2019) demonstrated that a prolonged stay in a reception centre can hinder a person's capacity to sustain relationships.

A second body of work centring on housing outcomes of BIPs has demonstrated the challenges confronted by BIPs when seeking access to the Irish housing market (Finn and Mayock, 2021; Ní Raghallaigh et al., 2016; Finn, 2015). Finn and Mayock's (2021) study on the housing pathways of immigrants in rural Ireland found that accessing housing after leaving reception centres was challenging for almost all BIPs, who typically accessed poor quality, small and cheap private rental accommodation. The same study also pointed to the impact of socio-legal status on a person's housing pathway, which is similarly demonstrated in recent qualitative research on the transition from IPAS accommodation to housing for BIPs. In PhD research on the transition from Direct Provision, Bieri (2024) found that being granted international protection status has a significant impact on a person's life, with BIPs describing feelings of both relief and exhaustion at this juncture. This decision also crucially was shown to trigger a 'dual transition', where a person both bureaucratically and symbolically transitions from IPA to BIP, but also experiences a housing transition from reception centres to a private rental market (Bieri, 2024). In making the 'bureaucratic transition' to BIP status, the individual concerned must begin to navigate new procedures and roles, a process that can amount to a significant administrative burden, with a need to acquire new forms of capital to navigate the different administrative systems (e.g. housing, welfare) (Bieri, 2024). The same study found that, compounding the above, time spent in a reception centre has a negative impact on a person's ability to acquire these forms of capital, which in turn negatively impacts their ability to navigate their lives following status being granted.

Overall, the study identified two housing journeys of BIPs when they leave IPAS accommodation:

- *Linear housing journey*: The BIP secured accommodation in the private rental market through HAP, with housing found through independent searches via rental property websites or viewings facilitated by NGOs.
- *Turbulent housing journey*: The BIP moved through several unstable, temporary accommodations, secured through their social ties. In such cases, social connections supported these individuals to secure temporary housing in an 'informal housing submarket with limited security and, at times, led to homelessness or situations of hidden homelessness' (Bieri, 2024, p. 217).

1.3 RESEARCH QUESTIONS

The research questions that guided this research are:

1. What supports are available for BIPs to access autonomous housing in Ireland?
2. What actors are involved in supporting access to autonomous housing, and what coordination mechanisms or gaps exist between them?
3. What challenges and good practices can be identified in relation to the provision of these supports?
4. What are the housing outcomes of BIPs, and what factors influence these outcomes?

1.4 METHODOLOGY AND SCOPE

This study is based on information submitted by the Irish National Contact Point (NCP) of the EMN to an EMN-wide inform (short study) on access to autonomous housing in the context of international protection. The submissions of NCPs from across the EMN are compiled in an EMN synthesis report (EMN, 2024).

A variety of methods were used. Firstly, desk research was conducted, including of relevant policy, legislation and academic literature. This was used to respond to the common template for the EMN inform (a short comparative report that looks at policy responses across EMN countries), which was sent to a variety of stakeholders for verification. This information was then supplemented with further research and interviews conducted between September 2023 and March 2024 with relevant stakeholders, including NGOs, local government representatives, housing policy researchers and analysts, and representatives of government departments and agencies. In total, 12 interviews were conducted with stakeholders, which were supplemented with written comments and additional meetings where needed.

Input was received from DCEDIY (including IPAS), DSP, the Department of Justice, DHLGH, a small number of local authorities, the Local Government Management Agency, Galway City Partnership, the Housing Agency, UNHCR Ireland, the Irish Refugee Council (IRC), Nasc, Doras, Crosscare, AkiDwA, Depaul, the Peter McVerry Trust, the Jesuit Refugee Service (JRS Ireland), Mercy Law Resource Centre, two housing policy researchers and one housing policy analyst with expertise in the area.

Applicants for international protection, BOTPs fleeing the conflict in Ukraine and other third-country nationals residing in Ireland are outside of the scope of this study. This report only covers policies and measures (targeted or mainstreamed) that support access to autonomous housing. Other services related to the reception and integration of BIPs are beyond its scope, except where they are

relevant to access to autonomous housing. We do not consider refugees who are resettled under the Irish Refugee Protection Programme in this report, as supports provided and governance structures are quite distinct for those falling under this category. However, a case study of these supports is provided in Box 4.1, as stakeholders identified this as a good practice model.

CHAPTER 2

Policies and measures to support access to autonomous housing

This chapter outlines the policies that Ireland has in place to support people in accessing autonomous housing, focusing on beneficiaries of international protection (BIPs). Both mainstream (Section 2.1) and targeted (2.2) policies are included in this chapter. The chapter also highlights coordination and collaboration between different actors working in the area (2.3), as well as a number of key planned policy developments (2.4).

2.1 MAINSTREAM SUPPORTS

Beneficiaries of international protection who are granted international protection status or permission to remain have the same access to housing supports and services as Irish citizens, as per the International Protection Act 2015 and as outlined in the Department Housing Circular 41/2012.⁴⁵ These are outlined below.

2.1.1 Social housing

Social housing supports and social housing tenancies are provided by a local authority or an approved housing body to people who are unable to afford housing from their own resources.⁴⁶ Income limits differ depending on the local authority.⁴⁷ Social housing supports and tenancies are provided in a number of ways:

- The Housing Assistance Payment (HAP), where a local authority will make a monthly payment to a private landlord through the HAP Shared Service Centre, subject to terms and conditions including rent limits, on a HAP tenant's behalf;
- A Rental Accommodation Scheme (RAS) tenancy, where the local authority arranges leases with private landlords;
- A rented tenancy in a property owned and managed by the local authority;
- A rented tenancy leased (long-term leasing) for 10–20 years by the local authority or approved housing body;
- A rented tenancy in a home owned and managed by an approved housing body (AHB);

⁴⁵ Department of Environment, Community and Local Government (2012). 'Housing Circular 41/2012'; DCEDIY, accessed 9 March 2023; 'Response to parliamentary question 12133/23', <https://www.oireachtas.ie/en/debates/question/2023-03-09/295/>.

⁴⁶ AHBs are independent, not-for-profit organisations. They provide affordable rented housing for people who cannot afford to pay private sector rents or buy their own homes. Some AHBs provide housing specifically for particular groups of people, such as older people or people experiencing homelessness; see <https://www.citizensinformation.ie/en/housing/local-authority-and-social-housing/approved-housing-bodies/>.

⁴⁷ Income limits vary between €30,000 and €40,000 per year. Citizens Information (2023). 'Apply for local authority/social housing', <https://www.citizensinformation.ie/en/housing/local-authority-and-social-housing/applying-for-local-authority-housing/>.

- Specific accommodation for vulnerable groups, namely people experiencing homelessness, older people, disabled people and Travellers; and
- Grants to increase accessibility in private homes for older people and people with disabilities.⁴⁸

It should be noted, however, that there are often long delays in accessing social housing (see Box 2.1 below).

BOX 2.1 SOCIAL HOUSING WAITING LISTS

Each local authority maintains its own social housing waiting list. Persons availing of HAP and therefore in receipt of social housing support can also opt to go on to a 'HAP transfer list', if they wish to avail of another form of social housing support.

In 2023, there were 58,824 households on the social housing waiting list (The Housing Agency, 2024). This does not include people who currently receive social housing supports. There were also 68,180 households in receipt of HAP in 2022 (CSO, 2023a). Not all of these households have necessarily applied to go on the transfer list.

In 2023, 21.5% of all households on social housing waiting lists were waiting for more than seven years (The Housing Agency, 2024).⁴⁹ Two-fifths (40.1%) of households were on the list for less than two years in 2023 (The Housing Agency, 2024).

In 2023, 1,261 households on the social housing waiting list were living in Direct Provision, a 120% increase from 2022, when this category was included in the analysis for the first time (The Housing Agency, 2023; 2024).

2.1.1.1 Qualifying for social housing supports

The law on social housing assessments is laid out in the Housing (Miscellaneous Provisions) Act 2009 and in the Social Housing Regulations 2011, as amended.⁵⁰

Households can only apply to one local authority for social housing, to which they ought to have a 'connection' (see below).⁵¹ To qualify for social housing (supports and/or tenancies), a household must be deemed to:

⁴⁸ The Housing Agency (n.d.). 'Social housing support overview', <https://www.housingagency.ie/housing-information/social-housing-support-overview>; correspondence with DHLGH, March 2024.

⁴⁹ The Housing Agency (2023). 'Summary of social housing assessments 2022: Key findings', <https://www.gov.ie/en/publication/862a4-summary-of-social-housing-assessments-2022-key-findings/>.

⁵⁰ Social Housing Assessment Regulations 2011. (S.I. No. 84/2011.) (Ire), <https://www.irishstatutebook.ie/eli/2011/si/84/made/en/print>. Amendments: S.I. No.321/ 2011 and S.I. No 288/ 2016.

⁵¹ Regulation 5 of the Social Housing Assessment Regulation 2011.

- be eligible for social housing,⁵² and
- be in need of social housing.⁵³

If they qualify, they are then placed on a social housing waiting list.

Connection to local authority area

Generally, a person can only apply to one local authority for social housing support. This should be the local authority in which the household ‘normally resides’ or with which the individual or family has a ‘local connection’. If they have neither, it is at the discretion of the local authority to grant support or to conduct a social housing assessment.⁵⁴ The test for a ‘local connection’ is based on whether:

- A household member has resided for a continuous five-year period at any time in the area concerned, or
- The place of employment of a household member is in the area concerned or is located within 15 kilometres of the area, or
- A household member is in full-time education in any university, college, school or other educational establishment in the area concerned, or
- A household member with an enduring physical, sensory, mental health or intellectual impairment is attending a medical or residential establishment in the area concerned that has facilities or services specifically related to such impairment, or
- A relative of a household member resides in the area concerned and has resided there for a minimum period of two years.⁵⁵

The local connection test may mean that a beneficiary of international protection (BIP) only qualifies for the area in which their International Protection Accommodation Services (IPAS) accommodation was located (i.e. where they normally reside), although if they are working or they or their family member is in education elsewhere they may qualify in another area. While local authorities may still grant social housing assessments and supports to those without a local connection, doing so is at their discretion and those without a local connection are often deprioritised, according to local authority schemes of letting priorities (which are adopted and updated regularly by each local authority – see Section 2.1.1.2 below) (The Housing Agency, 2022).⁵⁶

Generally, interviewees identified this local connection test as a challenge for BIPs, many of whom want to move to an area where they know people or where there

⁵² Part 4 of the Social Housing Assessment Regulations 2011.

⁵³ Part 5 of the Social Housing Assessment Regulations 2011.

⁵⁴ S.I. No. 84/2011 – Social Housing Assessment Regulations 2011, section 5.

⁵⁵ S.I. No. 84/2011 – Social Housing Assessment Regulations 2011, section 6.

⁵⁶ Interview with LGMA representatives, September 2023.

are more employment opportunities. When they try to do so, they may find they do not meet the local connection criteria (see Section 4.2.2.2).⁵⁷ It should be noted that an ‘information paper on supporting people with status/leave to remain’ was circulated by the Department of Housing, Planning and Local Government (now DHLGH) in 2019 to all local authorities, informing them that BIPs do not need to prove a ‘link’ to a local authority to be assessed by that local authority,⁵⁸ essentially exempting BIPs from the local connection test. However, most stakeholders consulted indicated that the local connection test was still being applied to BIPs by some local authorities, which is a consequence of the non-binding nature of the memo.⁵⁹

The significant barriers BIPs face accessing accommodation supports from local authorities led the Citizens Information Board to conclude that the social housing system was ‘largely ineffective for this group of people’ (Citizens Information Board, 2019). According to several interviewees, the situation in the housing market both in general and for BIPs has worsened since then,⁶⁰ though targeted supports have also since been put in place (see Section 2.2).

Eligibility

Eligibility for social housing is assessed prior to need assessment.⁶¹ In cases where somebody meets the needs requirements, they can still be disqualified based on behaviour in previously provided social housing, such as damage to property or rental arrears.⁶² Eligibility for social housing is dependent on:

- income being below the prescribed threshold,
- no access to alternative accommodation,⁶³ and
- residency, based on the criteria set out in Housing Circular 41/2012. (BIPs meet this requirement.⁶⁴)

Need

Once eligibility has been assessed, need for social housing is determined. This assessment is based on whether their current accommodation is:

⁵⁷ Interview with LGMA representatives, September 2023, Interview with the IRC, December 2023, Interview with Crosscare, December 2023.

⁵⁸ Correspondence with DHLGH, March 2024.

⁵⁹ Interview with housing policy analyst, December 2023; Interview with housing policy researcher A, December 2023; Interview with the IRC, December 2023; Interview with Crosscare, December 2023; Interview with local authority representative 1, December 2023.

⁶⁰ Interview with the IRC, December 2023; Interview with Crosscare, December 2023; Interview with housing policy analyst, December 2023; Interview with Nasc, November 2023.

⁶¹ Regulation 14, Social Housing Assessment Regulations 2011.

⁶² As per regulation 25 of the Social Housing Assessment Regulations.

⁶³ As defined by regulation 22 of the Social Housing Assessment Regulations 2022.

⁶⁴ Ministry of Environment, Community and Local Government (2012). ‘Access to social housing supports for non-Irish nationals – including clarification re Stamp 4 holders’, Housing Circular 41/2012.

- an institution, emergency accommodation or a hostel,
- overcrowded,⁶⁵
- fit for human habitation,
- meeting accommodation requirements arising from health impairments,
- shared with another household and the applicant household has a reasonable requirement for separate accommodation,
- unsuitable with regard to the household's particular circumstances or on exceptional medical or compassionate grounds,⁶⁶
- mortgaged with a mortgage that is unsustainable for the mortgagee,⁶⁷
- unsuitable for the household's adequate housing in another material respect, having regard to particular household circumstances.⁶⁸

Alternatively, the household must:

- require payment of a supplement towards its current accommodation; or
- be homeless (as per section 2 of the Housing Act 1988).⁶⁹

2.1.1.2 Prioritisation

Local authorities can prioritise support for households that qualify for social housing supports based on various criteria through the adoption of allocation schemes, as per section 22 of the Housing (Miscellaneous Provisions) Act 2009. This legislation requires all local authorities to make an allocation scheme determining the order of priority to be accorded in the allocation of dwellings to households qualified for social housing support.⁷⁰ Examples of priorities include:

- households deemed homeless;⁷¹
- people living in dangerous or overcrowded accommodation;⁷²
- older persons (aged 55 and up);⁷³
- people in need of accommodation on medical, disability or compassionate grounds;⁷⁴

⁶⁵ According to section 63 of the 1966 Housing Act.

⁶⁶ This and above from regulation 23, Social Housing Assessment Regulations 2011.

⁶⁷ Social Housing Assessment (Amendment) (No 2) Regulations 2011 S.I. No 321/2011.

⁶⁸ This and above from S.I. No. 288/2016 – Social Housing Assessment (Amendment) Regulations 2016.

⁶⁹ This and above from S.I. No. 288/2016 – Social Housing Assessment (Amendment) Regulations 2016.

⁷⁰ Correspondence with DHLGH, March 2024.

⁷¹ Kilkenny County Council (2023). 'Kilkenny County Council Scheme of Letting Priorities 2023', www.kilkennycoco.ie.

⁷² Dublin City Council (2018). 'Housing Allocations Scheme (Scheme of Letting Priorities (draft revision))', www.councilmeetings.dublincity.ie; Kerry County Council (n.d.) 'Social Housing Allocation Scheme', www.kerrycoco.ie.

⁷³ Kilkenny County Council (2023). 'Kilkenny County Council Scheme of Letting Priorities 2023', www.kilkennycoco.ie.

⁷⁴ Kilkenny County Council (2023). 'Kilkenny County Council Scheme of Letting Priorities 2023', www.kilkennycoco.ie; Dublin City Council (2018) 'Housing Allocations Scheme (Scheme of Letting Priorities (draft revision))', www.councilmeetings.dublincity.ie.

- people who have been living and/or working long term in the area;⁷⁵
- tenants surrendering larger accommodation in high demand areas.⁷⁶

It should also be noted that, in practice, priority tends to be given to families and older people, according to the Citizens Information Board.⁷⁷ Notwithstanding these priorities, a queue system operates, disadvantaging those who have been on lists for shorter periods of time. However, DHLGH noted that a local authority may disregard the order of priority under an allocation scheme for a household in certain exceptional circumstances, including: displacement by fire, flood or any other emergency; development, redevelopment or regeneration of an area by the housing authority; and exceptional medical or compassionate grounds.⁷⁸

2.1.1.3 Differential rent system

Social housing in Ireland uses a system of differential rent, whereby the tenant pays a contribution to the rent. The amount of the contribution is determined based on their income and household composition. Generally, this contribution is paid to the local authority, who pays the rent directly to the landlord in cases where the property is sourced through the private market (Doolan et al., 2022). In the case of HAP (see below), the tenant may also have to pay a top-up if the rent exceeds rent limits for the scheme. Each local authority operates its own differential rent scheme, with various rates, meaning that households in similar situations can be paying different amounts of rent, depending on the local authority involved (Doolan et al., 2022). See Doolan et al. (2022) for further details.

2.1.1.4 Types of social housing support

(i) Social housing tenancies

As mentioned above, there are different types of social housing support. One of the main forms of support comprises direct tenancies provided by local authorities (Doolan et al., 2022). These can either be in local authority owned properties, AHB owned properties, or in private properties leased by local authorities or AHBs. Doolan et al. (2022) found that social housing tenancies made up the majority of supported housing as of 2020.

(ii) Rent support for the private rental market

In addition to direct tenancies in local authority owned housing, another common form of social housing support involves the local authority subsidising private

⁷⁵ Wicklow County Council (2018). 'Scheme of Letting Priorities (Allocation Scheme for Social Housing) 2018', www.wicklow.ie.

⁷⁶ Dublin City Council (2018). 'Housing Allocations Scheme (Scheme of Letting Priorities (draft revision)', www.councilmeetings.dublincity.ie.

⁷⁷ Citizens information (2023). 'Social housing waiting lists', <https://www.citizensinformation.ie/en/housing/local-authority-and-social-housing/social-housing-waiting-lists/>.

⁷⁸ Correspondence with DHLGH, March 2024; section 22(7) Housing (Miscellaneous Provisions) Act 2009.

rented accommodation. The latter is generally available sooner than local authority tenancies. Forms of this support covered here are: the Housing Assistance Payment (HAP), including the Homeless HAP scheme, the Rental Accommodation Scheme (RAS) and Rent Supplement. Doolan et al. (2022) found that this approach makes up an increasing proportion of social housing supports compared to social housing tenancies; such support made up around one-third of supported renters in 2020, in spite of a decrease in the share of households eligible as a result of a freeze on income limits.

Housing Assistance Payment (HAP)

HAP is one of the main forms of support provided to tenants in the private rental sector and is intended for those with longer-term housing needs. People must be eligible for social housing to receive HAP.

HAP is provided by local authorities and involves a monthly payment from the local authority to a landlord on a tenant's behalf. In return, the tenant pays a weekly contribution to the local authority, which is calculated based on household income and household composition (Doolan et al., 2022; hap.ie, 2018). People who work full-time can claim HAP (unlike Rent Supplement, see below) (HAP.ie, 2018). HAP recipients must find their own accommodation in the private rented market. The payment is subject to terms and conditions, including rent limits, which differ for each local authority and are determined by household composition.⁷⁹

HAP recipients remain eligible for other forms of social housing support, through transfer lists operated by local authorities. Their chance of receiving other such supports is not affected by their accessing HAP (HAP.ie, 2018). HAP is often therefore used by those who are awaiting other forms of social housing.

While HAP has the same eligibility criteria as other forms of social housing, it is possible to use HAP to access housing in another local authority area, under a process known as Inter-Authority Movement of HAP Scheme Applicants. Under this scheme, individuals who find rental accommodation in another local authority area can receive support from their original local authority and remain on the housing list in their original local authority, while the new local authority is responsible for inspecting the property, and the HAP and income limits of the new local authority apply. To access this, both local authorities must offer 'shared areas of choice' in their housing allocation schemes, and other criteria may also need to be met, at the discretion of the local authority.⁸⁰

⁷⁹ Citizens Information (2024). Housing Assistance Payment, <https://www.citizensinformation.ie/en/housing/renting-a-home/help-with-renting/housing-assistance-payment/#f60791>.

⁸⁰ Department of Housing, Planning, Community and Local Government (2017). 'Inter-authority movement of Housing Assistance Payment (HAP) Scheme Applicants', Circular 15/2017; Citizens Information (2024). 'Housing Assistance Payment (HAP)', www.citizensinformation.ie, last accessed 19 February 2024.

Homeless HAP/Place Finder Service

Homeless HAP is a part of the HAP scheme that provides additional supports for people who are homeless or at risk of becoming homeless.⁸¹ Although persons living in IPAS accommodation are not considered to be homeless by most local authorities (see Section 2.1.3 below), ‘Homeless HAP’ is available to those with status in IPAS accommodation.⁸² This includes these supports:

- deposit paid directly to a landlord or agent,
- increased HAP limits (up to 35% increase outside the Dublin area, up to 50% increase in the Dublin area),⁸³
- rent paid in advance to a landlord or agent.⁸⁴

A Homeless HAP Place Finder Service is also available, across all local authorities. This helps households who are either homeless or at immediate risk of homelessness to find a HAP tenancy, with the additional supports available above.⁸⁵

Rent Supplement

Rent Supplement is designed to be a short-term income support for people in the private rented sector who cannot provide for the cost of their accommodation from their own resources.⁸⁶ People in full-time employment are not entitled to Rent Supplement.⁸⁷ This support is for tenants who are living in private rented accommodation who could afford the rent at the beginning of their tenancy but become unable to continue to do so because of a substantial change in their circumstances, which occurred after they started renting, and who have been living in private rented accommodation for at least 6 of the last 12 months.⁸⁸ It is therefore also less likely to be relevant to international protection beneficiaries who are trying to access autonomous housing for the first time.

Rental Accommodation Scheme (RAS)

RAS is a form of long-term social housing support run by local authorities. Generally, it supports the accommodation needs of those who are in receipt of Rent Supplement for 18 months or longer and who are assessed as having a long-

⁸¹ HAP.ie. (n.d.). ‘What is Homeless HAP?’, <https://www.hap.ie/homeless-hap/>.

⁸² Interview with LGMA, September 2023; DCEDIY (2023). ‘Response to parliamentary question 12133/23’, 9 March, <https://www.oireachtas.ie/en/debates/question/2023-03-09/295/>.

⁸³ HAP.ie. (2024a). ‘Information for tenants’, <https://www.hap.ie/homeless-hap/homelesshaptenants/>.

⁸⁴ DCEDIY (2023). ‘Response to parliamentary question 12133/23’, 9 March, <https://www.oireachtas.ie/en/debates/question/2023-03-09/295/>.

⁸⁵ Citizens Information (2024). ‘Housing Assistance Payment (HAP)’, <https://www.citizensinformation.ie/en/housing/renting-a-home/help-with-renting/housing-assistance-payment/>.

⁸⁶ Citizens Information (2022). ‘Rent Supplement’, <https://www.citizensinformation.ie/en/social-welfare/social-welfare-payments/supplementary-welfare-schemes/rent-supplement/>, last accessed 19 February 2024.

⁸⁷ Citizens Information (2022). ‘Rent Supplement’, <https://www.citizensinformation.ie/en/social-welfare/social-welfare-payments/supplementary-welfare-schemes/rent-supplement/>, last accessed 19 February 2024.

⁸⁸ Sections 196, 198 Social Welfare (Consolidation) Act 2005, as amended by section 54 Housing (Miscellaneous Provisions) Act 2015.

term housing need with properties sourced from the private rental market.⁸⁹ While RAS was designed to be sourced through private sector landlords, there is a second dimension to the scheme whereby accommodation is provided to those on the social housing waiting lists by AHBs through properties that have been funded by DHLGH under the Capital Assistance Scheme.⁹⁰

It is planned that HAP will eventually replace RAS.⁹¹ DHLGH has been undertaking a review of the future of RAS, and has recently indicated (in March 2024) that this is almost complete.⁹²

Under RAS, contracts are drawn up by local authorities with landlords to provide housing for people with a long-term housing need.⁹³ The contract includes the landlord's agreement to provide housing for a specific period of time, and the local authority pays the rent directly to the landlord. The tenant pays a differential rent directly to the local authority.⁹⁴

2.1.1.5 Other housing schemes

The following schemes are available to international protection beneficiaries. However, they are less likely to be relevant to those immediately moving out of institutional housing, as many relate to the purchase of a home, which requires significant additional resources:

- Help to Buy scheme
- Local Authority Affordable Purchase Scheme
- First Home Scheme
- Local Authority Home Loan Scheme
- Cost Rental. (This targets at middle-income households with incomes above social housing limits; rents are targeted at 25% below private market rents in the area.)⁹⁵

A representative from the Peter McVerry Trust noted that a small number of people have the resources to plan to buy a house when they are leaving IPAS accommodation.⁹⁶ These schemes may be relevant to that small subgroup.

⁸⁹ Correspondence with DHLGH, March 2024.

⁹⁰ Correspondence with DHLGH, March 2024.

⁹¹ Citizens Information (2021). 'Rental Accommodation Scheme', <https://www.citizensinformation.ie/en/housing/local-authority-and-social-housing/rental-accommodation-scheme/>.

⁹² Correspondence with DHLGH, March 2024.

⁹³ Citizens Information (2021). 'Rental Accommodation Scheme', <https://www.citizensinformation.ie/en/housing/local-authority-and-social-housing/rental-accommodation-scheme/>.

⁹⁴ Citizens Information (2021). 'Rental Accommodation Scheme', <https://www.citizensinformation.ie/en/housing/local-authority-and-social-housing/rental-accommodation-scheme/>.

⁹⁵ Department of Housing, Local Government and Heritage (2023). 'Housing for All – Available supports', <https://www.gov.ie/en/publication/5568b-housing-for-all-available-supports/>.

⁹⁶ Interview with Peter McVerry Trust, March 2024.

2.1.2 Social welfare payments

BIPs are also entitled to social welfare payments on the same basis as Irish citizens, once protection has been granted.⁹⁷

The Community Welfare Service may be of particular relevance because it provides additional financial support to people on a low income or getting a social welfare payment. It also provides support to people in particular hardship or during an emergency. Community welfare officers, employed by the Department of Social Protection (DSP), decide on all applications for financial support to the Community Welfare Service.⁹⁸ Payments administered under the scheme include Supplementary Welfare Allowance, as well as diet and heating supplements, Rent Supplement (see Section 2.1.1.3) and the Additional Needs Payment. Payments can be once-off or a regular supplement.⁹⁹

The Additional Needs Payment is of particular relevance to the transition to autonomous housing and is available to people on a low income or in receipt of social welfare payments.¹⁰⁰ This payment provides financial support for additional expenses that cannot be paid from someone's weekly income. A range of things can be covered by this payment, including deposits for private rented accommodation, furniture, white goods, floor covering, bedding, and cooking utensils when a person moves into their first home.¹⁰¹ This payment is flexible, with no set rate. The amount granted is based on individual circumstances and needs. When someone applies for an Additional Needs Payment, the application is assessed by a community welfare officer. The Irish Refugee Council (IRC) have raised problems with delays in processing this payment.¹⁰² However, DSP stated that where there is an urgent or immediate need, they try to process the claim on the same day, with 19% of all Community Welfare Service payments made on this basis.¹⁰³ The Department indicated that delays can occur when additional information is needed, but that complete applications are typically finalised within two weeks.¹⁰⁴ DSP further reported that as of March 2024, there were no delays with the processing of Additional Needs Payments for new accommodation kit outs.¹⁰⁵

⁹⁷ Section 53(b) International Protection Act 2015.

⁹⁸ Citizens Information (n.d.). 'Community Welfare Service and payments'.

⁹⁹ Citizens Information (n.d.). 'Community Welfare Service and payments'.

¹⁰⁰ Section 201 Social Welfare (Consolidation) Act 2005 (as amended) Citizens Information (2023) 'Additional Needs Payment', see <https://www.citizensinformation.ie/en/social-welfare/social-welfare-payments/supplementary-welfare-schemes/additional-needs-payment/>.

¹⁰¹ Section 201 Social Welfare (Consolidation) Act 2005 (as amended) Citizens Information (2023). 'Additional Needs Payment', see <https://www.citizensinformation.ie/en/social-welfare/social-welfare-payments/supplementary-welfare-schemes/additional-needs-payment/>; Correspondence with DSP, March 2024.

¹⁰² Correspondence with the IRC, September 2023.

¹⁰³ Correspondence with DSP, October 2023.

¹⁰⁴ Correspondence with DSP, October 2023.

¹⁰⁵ Correspondence with DSP, March 2024.

2.1.3 Emergency homelessness supports

Emergency homelessness supports emerged from the research as an important support for some BIPs (see Section 4.2.2.7 for more on this discussion).

The Housing Act 1988 both defines homelessness and gives local authorities the powers to use additional measures to house people experiencing homelessness.¹⁰⁶ The definition of homelessness in the Housing Act is:

(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.

The IRC and Nasc highlighted that while the BIPs who live in IPAS accommodation and are unable to move into autonomous housing arguably fit into this definition of homelessness, they are not included in the monthly figures of local authority emergency homeless accommodation; neither are they considered homeless by most local authorities.¹⁰⁷ According to DHLGH, while the BIP has access to a bed in IPAS accommodation, they are not typically assessed as homeless under the terms of the Act.¹⁰⁸

Section 10 of the 1988 Act gives local authorities the power to provide accommodation for homeless persons through various means, although they are not statutorily required to do so.¹⁰⁹ These include making financial arrangements with approved bodies to provide accommodation, providing financial assistance to the person, or renting accommodation or contributing to the cost of accommodation for the person.¹¹⁰

Chapter 6 (sections 36–42) of the Housing (Miscellaneous Provisions) Act 2009,¹¹¹ however, obligates a local authority to put in place a homelessness action plan and

¹⁰⁶ The Housing Act 1988 (Act No. 2/1988) (Ir.), <https://www.irishstatutebook.ie/eli/1988/act/28/enacted/en/html>.

¹⁰⁷ Interview with the IRC, December 2023; Interview with Nasc, November 2023; confirmed by Interview with local authority representative 1, December 2023. NB: BIPs who are accommodated in local authority emergency homeless accommodation are counted in homelessness figures; correspondence with LGMA, February 2024.

¹⁰⁸ Correspondence with DHLGH, March 2024.

¹⁰⁹ Mercy Law Resource Centre noted that courts have interpreted section 10 as imposing a duty in some circumstances: see *O'Donnell v South Dublin County Council* [2015] IESC 28.

¹¹⁰ Section 10(1) of the Housing Act 1988.

¹¹¹ Housing (Miscellaneous Provisions) Act 2009. (1/2009) (Ire), <https://www.irishstatutebook.ie/eli/2009/act/22/enacted/en/html>.

governance structures around the plan. Therefore, while people experiencing homelessness can continue to be assessed for social housing under normal procedures, where there is an immediate need for accommodation, they can also apply to local authorities for emergency homeless accommodation using the means outlined in section 10 of the 1988 Act. Grounds for eligibility for this are separate from the eligibility requirements for social housing in the legal framework. Despite this, concerns have been raised about local authorities refusing to provide people (BIPs and others) with emergency accommodation, basing their refusal on the ‘local connection’ test, which relates to the legal framework on social housing.¹¹² A recent protocol developed by the County and City Management Association (CCMA) clarifies local authority policy in relation to this.¹¹³ The protocol indicates that households seeking support from a local authority on the basis of being at risk of or experiencing homelessness should present to their local authority of origin, but that the local authority to which they present should provide accommodation on an emergency basis for the day/night of the presentation. The local authority to which they present should then contact the local authority of origin. Where there are delays, the presenting local authority continues to make emergency accommodation available up to a maximum of five days, according to the protocol.

It should be noted that IPAS adheres to a policy of non-eviction of BIPs into local authority operated emergency homeless accommodation.¹¹⁴ However, refusals of transfer offers (see Sections 1.1.1 and 4.2.2.6), for example, can result in BIPs losing their place in IPAS accommodation.¹¹⁵

2.1.4 Mechanisms to assess adequacy of housing

There are no mechanisms to assess the adequacy of housing accessed by BIPs once they leave the IPAS system, as IPAS does not track BIPs after they leave.¹¹⁶ There are mainstream mechanisms in place to assess the adequacy of social housing and private rented accommodation.

Minimal standards for rented accommodation from private landlords are set out in the Housing (Standards for Rented Houses) Regulations 2019. Local authorities are responsible for the enforcement of these standards, and conduct inspections of private rental properties.¹¹⁷ Housing for All, the Irish Government’s housing plan to 2030, sets an annual target of inspections of 25% of all private residential

¹¹² See <https://www.flac.ie/blog/continued-use-of-local-connection-tests-a-concern-for-flac/>; <https://www.rte.ie/news/investigations-unit/2021/0305/1201083-homeless-rough-sleeping-dublin-emergency-hostels/>; https://mercyllaw.ie/wp-content/uploads/2021/03/ML_2020_Minority-Groups-and-Housing-Services_Report_D6.pdf.

¹¹³ CCMA (2023). ‘Local connection protocol for homeless presentations outside county of origin’.

¹¹⁴ Interview with IPAS, January 2024.

¹¹⁵ Interview with IPAS representative, January 2024; Interview with the IRC, December 2023; Meeting with IPAS representative, February 2024; correspondence with Mercy Law Resource Centre, April 2024.

¹¹⁶ Interview with IPAS, January 2024.

¹¹⁷ Housing (Miscellaneous Provisions) Act 1992; interview with the Housing Agency representative, January 2024.

tenancies.¹¹⁸ HAP properties must be inspected by local authorities as part of these inspections, with local authorities required to inspect a property within eight months of the beginning of a HAP tenancy unless the property has already been inspected in the previous 12 months.¹¹⁹ In 2022, 51% of private rental inspections were carried out on dwellings with HAP supported tenancies.¹²⁰ Inspections have increased significantly in recent years, from an average of 20,000 a year between 2005 and 2017 to over 49,000 in 2022 and approximately 63,000 in 2023.¹²¹

Nevertheless, a 2023 Residential Tenancies Board (RTB) survey found that non-Irish citizens were less likely to have properties inspected than Irish citizens (10% versus 19%) (RTB, 2023b). There is evidence that a significant proportion of rental accommodation does not meet the minimum standards, with 91% of inspected properties in 2022 not meeting regulatory requirements on their first inspection.¹²² This varies significantly by local authority, but in 2022, 24 of 31 local authorities recorded that more than 90% of inspected dwellings were found to be non-compliant with regulations.¹²³ However, DHLGH noted that this may overstate the overall proportion of rental accommodation units not meeting minimum standards. This is because inspections are often conducted in response to complaints and suspected substandard dwellings are also often proactively targeted. DHLGH also noted that inspections are based on a pass/fail evaluation, whereby a dwelling will fail if it has only one minor non-compliance issue.¹²⁴ Following failed inspections, local authorities can issue improvement letters or improvement notices to landlords for improvements to be carried out.¹²⁵ Where a landlord fails to comply with an improvement notice, prohibition notices can be served on landlords and local authorities may consider initiating legal proceedings.¹²⁶ However, in 2023, only four legal actions were initiated, all by Dublin City Council, and only 146 prohibition notices were issued, while approximately 44,893 improvement letters were issued.¹²⁷

2.2 TARGETED SUPPORTS

While Ireland generally takes a mainstreaming approach towards migrant integration, some programmes have been put in place to support BIPs to access

¹¹⁸ Correspondence with DHLGH, March 2024; Government of Ireland (2021) *Housing for All – A New Housing Plan for Ireland*, www.gov.ie.

¹¹⁹ Housing Assistance Payment Regulations 2014, S.I. No 407/2014, section 7; Housing (Miscellaneous Provisions) Act 2014, section 41(2).

¹²⁰ Correspondence with DHLGH, March 2024.

¹²¹ Provisional data for 2023 – correspondence with DHLGH, March 2024.

¹²² See National Oversight and Audit Commission (2023). *Local authority performance indicator report 2022*, NOAC Report No. 58.

¹²³ See National Oversight and Audit Commission (2023). *Local authority performance indicator report 2022*, NOAC Report No. 58.

¹²⁴ Correspondence with DHLGH, March 2024 and April 2024.

¹²⁵ Correspondence with DHLGH, March 2024.

¹²⁶ Housing (Miscellaneous Provisions) Act 1992; correspondence with DHLGH, March 2024.

¹²⁷ See Government of Ireland (n.d.). *Private rental inspections 2005–2023*, <https://www.gov.ie/en/publication/da3fe-private-housing-market-statistics/#private-rented-inspections>.

autonomous housing, due to difficulties that BIPs have faced and the subsequent pressure on reception systems. At present, while DCEDIY provides some support services, targeted supports are provided almost entirely by NGOs, either through government commissions or through independent non-governmental organisation (NGO) projects.

2.2.1 DCEDIY services

DCEDIY has a specific team within IPAS, which works on coordinating transition from IPAS reception centres into autonomous housing. This team works with Depaul and the Peter McVerry Trust (both homelessness NGOs, see Section 2.2.2), officials in DHLGH, and the County and City Management Association. They both provide some services directly, and commission services.

One service provided by DCEDIY through IPAS involves teams going into centres to hold information clinics, talk to families about their options, and encourage people to take the next steps.¹²⁸ At time of writing, DCEDIY arranges clinics with families in IPAS accommodation who have had status for 18 months and who may therefore be issued a transfer letter six months later (once they have had status for 24 months). At these clinics, they are advised on the law and their options. Teams check whether they are on the housing waiting list and also advise them to link in with their caseworker from Depaul or Peter McVerry Trust.¹²⁹

2.2.2 DCEDIY commissioned services

As mentioned above, DCEDIY commission support services for BIPs trying to transition into autonomous housing. As of January 2024, 32 caseworkers were employed by Depaul and Peter McVerry Trust to support people transitioning into autonomous housing, a two-fold increase since mid-2023.¹³⁰ The contracts divide all counties between the two organisations. According to DCEDIY, these caseworkers:

- provide housing assessments to identify needs and requirements;
- assist with registering with the relevant local authority for social housing supports;
- identify suitable properties;
- arrange, attend and follow up with property viewings when required; and
- provide practical assistance, i.e., assisting with the start of tenancy agreements, utilities, setting up direct debits/standing orders.¹³¹

¹²⁸ Interview with IPAS representative, January 2024.

¹²⁹ Meeting with IPAS representative, February 2024.

¹³⁰ Interview with IPAS representative, January 2024; DCEDIY (2023). 'Response to parliamentary question 17589/23', 18 April, <https://www.oireachtas.ie/en/debates/question/2023-04-18/1260>.

¹³¹ DCEDIY (2023). 'Response to parliamentary question 17589/23', 18 April, <https://www.oireachtas.ie/en/debates/question/2023-04-18/1260/>.

Once people receive their status, IPAS writes to them with the contact details of their support worker, in either Depaul or the Peter McVerry Trust (depending on their location).¹³² In addition to assisting with housing applications, both Depaul and the Peter McVerry Trust try to support a person's integration into the community. This involves providing information about vocational and training courses (such as suitability, locations and eligibility), CV preparation and aid with medical issues, should they arise.¹³³ A representative from the Peter McVerry Trust explained that the organisation also provides information to support people who express their wish to make a mortgage application, indicating, however, that only a small number of people do so.¹³⁴

Some NGOs highlighted the strain this service was under, noting how caseworkers each had a large caseload, which led to poor outcomes.¹³⁵ As of January 2024, there were approximately 185 BIPs (or 112 households) living in IPAS accommodation per caseworker.¹³⁶ Crosscare highlighted challenges associated with the labour-intensive nature of assisting individuals in accessing housing and the resulting difficulties in providing support to many people at once.¹³⁷ While a representative of the Peter McVerry Trust agreed that their service was overstretched, they explained that the caseworkers don't necessarily see all 185 people, because not everybody engages with the service.¹³⁸ They also highlighted that not all BIPs need the service to move on.¹³⁹

2.2.3 NGO provision of support

Many NGOs provide BIPs support in accessing autonomous housing, including the Irish Refugee Council (Dublin), Crosscare (Dublin), Doras (Limerick) and Nasc (Cork).¹⁴⁰ Some of these organisations are funded or partially funded through government grants.

¹³² DCEDIY (2023). 'Response to parliamentary question 31547/23', 28 June, <https://www.kildarestreet.com/wrans/?id=2023-06-28a.342>.

¹³³ DCEDIY (2023). 'Response to parliamentary question 11447/23', 7 March, <https://www.kildarestreet.com/wrans/?id=2023-03-07a.1144>. The calculation is based on 6,000 people with status and 32 caseworkers.

¹³⁴ Interview with Peter McVerry Trust, March 2024.

¹³⁵ Interview with Crosscare, December 2023; Interview with the IRC, December 2023

¹³⁶ Based on data from IPAS correspondence, February 2024. As of end January 2024, there were 5,914 people with status in IPAS accommodation, made up of 2,471 single people, 1,031 families and 77 couples – 3,579 households in total. There were 32 caseworkers funded by DCEDIY; interview with IPAS, January 2024.

¹³⁷ Interview with Crosscare, December 2023.

¹³⁸ Interview with Peter McVerry Trust representative, March 2024.

¹³⁹ Interview with Peter McVerry Trust representative, March 2024.

¹⁴⁰ Note that Nasc have a limited focus on housing (Interview with Nasc representative, November 2023).

As many of these NGOs are based in larger urban centres, geographic discrepancy in access to services was noted in several interviews and stakeholder comments.¹⁴¹ It was highlighted that many services (particularly specialist services) are concentrated in urban centres, whereas accommodation centres are spread out across the country, and are often located in more rural areas (see Figure 1.1 and Section 1.1.1). This can mean some services are inaccessible to some BIPs in some areas. On the other hand, a UNHCR Ireland representative noted that, despite these challenges, it may be easier and more affordable to find accommodation in some rural areas.¹⁴² The Irish Refugee Council (IRC) also noted that there are many smaller community support groups around the country that work with people locally so people may have access to some supports,¹⁴³ and the Peter McVerry Trust suggested that supports outside of urban areas are improving.¹⁴⁴

BOX 2.2 CASE STUDY OF NGO SUPPORTS: IRISH REFUGEE COUNCIL

The IRC works on housing across two areas. The main area of their housing work is casework and advocacy. In this role, they provide workshops and one-to-one support to people living in IPAS or homeless accommodation. They work with approximately 250 people per quarter, assisting with social housing applications, providing information on HAP and finding tenancies. They also provide advocacy and support for families that arrive through family reunification.¹⁴⁵

The IRC also have a housing programme that focuses on assisting people transitioning out of IPAS accommodation, with the provision of direct housing support and accommodation. The IRC own 17 properties, which are sub-let to individuals and families transitioning out of IPAS accommodation. There are approximately 80 residents in these properties.¹⁴⁶ This housing programme is self-funded, as the properties were donated by religious missionary congregations and civil society. Tenants pay rent via the HAP scheme (see Section 2.1.1.3).¹⁴⁷ According to the IRC, the housing was intended to be transitional; however, due to the ongoing housing crisis, people have not been able to move out.¹⁴⁸ Despite a number of families moving on to more suitable accommodation, most tenants have been living in these properties for four or more years. The ongoing housing crisis continues to challenge the organisation in its efforts to support tenants to move.¹⁴⁹

¹⁴¹ Interview with Crosscare, December 2023; Interview with Housing Agency representative, January 2024; Correspondence with the IRC, March 2024; Correspondence with JRS Ireland, February 2024; Correspondence with local authority representative 2, February 2024. Correspondence with UNHCR, February 2024; interview with AkiDwA, December 2023; Correspondence with AkiDwA, March 2024; Correspondence with Nasc, March 2024.

¹⁴² Correspondence with UNHCR, February 2024.

¹⁴³ Correspondence with the IRC, March 2024.

¹⁴⁴ Interview with Peter McVerry Trust representative, March 2024.

¹⁴⁵ Correspondence with the IRC, September 2023.

¹⁴⁶ Correspondence the IRC representative, March 2024.

¹⁴⁷ Correspondence with IRC representative, March 2024.

¹⁴⁸ Correspondence with the IRC, September 2023.

¹⁴⁹ Correspondence with IRC representative, March 2024.

In addition to housing support, those benefiting from the housing programme receive integration supports, including English language training, education and employment, with the aim of placing them in a better position in their efforts to move independently into the private rental market.¹⁵⁰ It should be noted that the need for such integration supports was reported by the IRC to have diminished over time.¹⁵¹

Other supports provided by the IRC include:

- Weekly housing application morning group workshop, in which they explain the current housing situation in Ireland, help people to fill in housing application forms and to prepare the necessary documents, and assist people submitting their applications to the local authority.
- Weekly HAP/tenancy finding group workshop, in which they help individuals to understand how HAP (including Homeless HAP) works, how to search for private rental accommodation, how to communicate with landlords, their rights and responsibilities as a tenant, and how to navigate reference letters.¹⁵²
- Individual casework and support, with 631 people provided with information and advice in 2022 (IRC, 2023).¹⁵³

Box 2.2 shows a case study of the supports provided by the Irish Refugee Council. Several other NGOs work regionally to provide casework and supports for individuals transitioning out of IPAS accommodation centres, often through their existing casework support. These include: Doras (Limerick) (Doras, n.d.), Crosscare Refugee Service (Dublin),¹⁵⁴ and Nasc (Cork).¹⁵⁵

In addition, ad hoc community projects exist that provide supports for integration for BIPs.¹⁵⁶ Doras, for instance, provides individual casework support to people ready to transition out of IPAS accommodation centres. Oftentimes this involves support with filling in the social housing application form. Doras also leverage their contacts in the local HAP Place Finder Service offices at local authorities to try to link up suitable candidates with available properties. The NGO has reported that although this had worked well over the past 24 months, finding properties has proven more difficult recently with the growing severity of the accommodation crisis. For them, the willingness of Place Finder staff to engage with IPAS

¹⁵⁰ IRC (n.d.). 'A place to call home', see <https://www.irishrefugeecouncil.ie/Listing/Category/housing>.

¹⁵¹ Correspondence with IRC representative, March 2024.

¹⁵² IRC (n.d.). 'Housing', see <https://www.irishrefugeecouncil.ie/housingservice>.

¹⁵³ IRC (2023). *Impact report 2022*, <https://www.irishrefugeecouncil.ie/Handlers/Download.ashx?IDMF=b96297ac-ba83-4ce6-8874-c1ebda4c4e63>.

¹⁵⁴ Correspondence with Crosscare Refugee Service, October 2023.

¹⁵⁵ Nasc (n.d.). 'Advocacy service', see <https://nascireland.org/advocacy-service>.

¹⁵⁶ Interview with IPAS, January 2024.

accommodation centres and make connection with property owners on behalf of clients was key to securing accommodation.¹⁵⁷

Crosscare also provide social care support through their ‘in-reach’ team, which operates in IPAS accommodation centres. For IPAs, it focuses on broader social supports rather than the transition to housing specifically. Crosscare indicated that housing transition support work is quite labour intensive, with relatively poor outcomes due to the lack of accommodation options.¹⁵⁸ Crosscare focuses on preventing homelessness for those who are in autonomous housing but risk losing it for various reasons, and supporting people to access emergency homeless accommodation where no other options exist.¹⁵⁹

Nasc’s New Beginnings project provides wraparound supports for newly arrived families arriving through family reunification with BIPs and people exiting IPAS accommodation. Supports include assistance with social welfare, employment, education, and increasingly focus on housing and homelessness. Nasc indicated that they conduct a significant amount of advocacy on access to local authority emergency homeless accommodation.¹⁶⁰

The Jesuit Refugee Service Ireland runs the Connecting Communities project, which aims to enhance the long-term integration prospects of persons who have been granted status or permission to remain and who are trying to exit IPAS accommodation. A nationwide project, it also seeks to reduce the associated impacts of social exclusion – through the provision of integration supports (immigration, welfare, employment, psychosocial and links to the community) throughout the transition process and after people move into communities. This project is designed to complement the projects run by Depaul and Peter McVerry Trust mentioned above.¹⁶¹ Activities delivered included:

- Outreach: Nationwide coordination transition clinics – both onsite and remote – identify and support persons granted status/permission to remain who are seeking to exit IPAS accommodation.
- Transition: Assessment and supports are provided to meet the immigration, welfare, employment, psychosocial and community links needs of project participants, in liaison with designated housing bodies supporting transition to private accommodation.
- Integration: Integration supports are provided nationwide to persons granted status/permission to remain after they move into communities.

¹⁵⁷ Correspondence with Doras, September 2023.

¹⁵⁸ Correspondence with Crosscare, December 2023.

¹⁵⁹ Correspondence with Crosscare, December 2023.

¹⁶⁰ Correspondence with Nasc, March 2024.

¹⁶¹ UNHCR (n.d.). ‘Housing support’ (Help Ireland page), <https://help.unhcr.org/ireland/where-to-seek-help/housing-support/>.

Links are facilitated to local services, amenities and communities to foster long-term integration and independent living.

The Connecting Communities Project ran from December 2020 to November 2023 and was awarded funding as part of the DCEDIY 2020 National Integration Funding open call.

BOX 2.3 EXAMPLE OF AN EU-FUNDED LOCAL PROJECT

While not housing specific, the Bridge Project seeks to promote the effective delivery of reception and integration supports (including advocacy and capacity building interventions) to asylum seekers and third-country nationals living in Galway city and county.¹⁶² The project is coordinated by Galway City Partnership, and is funded under the Asylum, Migration and Integration Fund (AMIF). Initiated in 2017, the Bridge Project secured funding until December 2023.

This project tackles several challenges faced by international protection beneficiaries regarding access to autonomous housing, including by capacity building to access employment, training and language supports, and increased access to information and community supports. For example, it introduced Threshold, an independent advice and advocacy organisation for those experiencing problems in the Irish rental market, to IPAs during their housing workshops.¹⁶³

The project is also currently developing an intercultural and anti-racism strategy for Galway city, and in this seeks to ensure there is an appropriate response given to intercultural issues and that racism is challenged. The strategy also contains recommendations on housing and accommodation, such as monitoring the impact of housing policies on discrimination and segregation in Galway.¹⁶⁴

2.3 COORDINATION AND COLLABORATION

2.3.1 Local and national government

As described in Section 2.1.1, local authorities are primarily responsible for the provision of social housing to international protection beneficiaries who are eligible for social housing, and have forums to enable the coordination between different local authorities on this issue (among others). Some examples follow.

- The Local Government Management Authority (LGMA) has a housing delivery coordination unit, which supports the coordination of social housing delivery across local authorities.

¹⁶² Galway City Partnership (n.d.). 'Asylum Migration Integration Fund (AMIF) – The Bridge Project', <https://gcp.ie/programmes-supports/support-for-communities/asylum-migration-integration-fund-a-m-i-f-the-bridge-project/>.

¹⁶³ Correspondence with Galway City Partnership, September 2023.

¹⁶⁴ Correspondence with Galway City Partnership, September 2023.

- The LGMA Ukrainian/migrant unit has a single point of contact in each local authority and provides the national coordination of the new Local Authority Integration Teams (LAIT) in local authorities.
- There are monthly meetings of the chief executives of the 31 local authorities, with 7 functional committees, some of which are relevant to the provision of autonomous housing. The CCMA Housing, Building and Land Use Committee has a remit in terms of the provision of autonomous housing.
- The director of housing within each local authority has a forum that meets on a quarterly basis.

There is also cooperation between local authorities and central government, with, for instance, one person seconded to the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) from a local authority (Dublin Regional Homeless Executive) to support with coordination and communication between IPAS and local authorities on supporting the transition into autonomous housing.¹⁶⁵ As described in Section 2.4.2, DCEDIY is now funding a permanent integration team (currently with four positions) in each local authority to coordinate the integration of migrants, including international protection beneficiaries.¹⁶⁶

A number of coordination mechanisms exist between local authorities and relevant central government departments.

- The Approved Housing Body Forum is run by the Housing Agency (a government body working with the Department of Housing) and has two representatives from local authorities.
- The CCMA has regular engagement with the relevant government departments.
- A programme board to oversee transition to the new international protection support service, as described in the *White White Paper to End Direct Provision and to Establish a New International Protection Support Service*, was established in 2021.¹⁶⁷ Membership of the board includes a representative with lived experience of international protection, representatives of NGOs working in the area of asylum seeker and refugee integration, UNHCR Ireland, independent experts in housing, health and change management, and relevant government departments and agencies, including DHLGH.
- The International Protection Support Service (IPSS) Steering Group has been established to progress a number of themes, including supporting

¹⁶⁵ Interview with LGMA, September 2023; Meeting with IPAS, February 2024.

¹⁶⁶ Interview with LGMA, September 2023.

¹⁶⁷ Hereafter in this chapter this is referred to as the *White White Paper to End Direct Provision* for brevity.

pathways for BIPs and developing local authority integration teams (see Section 2.4.2 below). It is chaired by a local authority chief executive, and includes representation from relevant DCEDIY teams and DHLGH.^{168,169}

- A LAIT working group has been established with representation from DCEDIY, local authorities and the LGMA. This working group answers to the International Protection Support Service Working Group (above).¹⁷⁰
- A new community engagement team has been established in DCEDIY to communicate with local authorities about the opening of new accommodation centres.¹⁷¹
- One person has been seconded from a local authority into IPAS, and often acts as a point of contact for local authorities.¹⁷²
- There are a number of coordination mechanisms between local government and government departments in the wider accommodation provision arena. These include new working groups established in response to the humanitarian crisis resulting from the Russian invasion of Ukraine.

While there are regular coordination meetings between IPAS and DHLGH, there seems to be few formal cooperation forums or protocols.¹⁷³ The Expert Advisory group on Ending Direct Provision (an external group made up of experts who monitor the implementation of the *White Paper to End Direct Provision*) consistently make recommendations for formal cooperation and collaboration between the two departments.¹⁷⁴ While the research identified multiple forms of cooperation and collaboration, some of these were ad hoc and relationship-based, rather than a reflection of formal inter-agency or inter-departmental protocols.

DSP flagged the need to improve engagement with the Community Welfare Service (see Section 2.1.2), which currently is not involved in many of the governance mechanisms indicated above; neither is it, according to DSP, linked in with LAITs in many local authorities.¹⁷⁵ DSP also indicated that the Community Welfare Service currently is not being notified of new arrivals, although the Community Welfare Service can provide an important support.¹⁷⁶

¹⁶⁸ Correspondence with DHLGH, March 2024.

¹⁶⁹ LGMA correspondence, February 2024; Meeting with IPAS, February 2024; Correspondence with DHLGH, March 2024.

¹⁷⁰ Meeting with IPAS representative, February 2024.

¹⁷¹ Meeting with IPAS, February 2024.

¹⁷² Meeting with IPAS, February 2024.

¹⁷³ Meeting with IPAS, January 2024; Interview with Housing Agency, January 2024; Meeting with IPAS, February 2024.

¹⁷⁴ Correspondence with UNHCR Ireland representative, February 2024.

¹⁷⁵ Correspondence with DSP, April 2024.

¹⁷⁶ Correspondence with DSP, April 2024.

2.3.2 Government actors and NGOs

DCEDIY funds NGOs to provide transition supports to BIPs across the country; Depaul and the Peter McVerry Trust have been contracted for this purpose (see Section 2.2.2 for more details). These and others NGOs who are providing support work independently of local authorities, though usually coordinate with them to ensure that they are not competing for the same properties, for example.¹⁷⁷ Interviewees spoke of how they often also develop contacts with local authorities to enable better coordination on individual applications.¹⁷⁸ One interviewee indicated that a local authority had contacted their NGO to request training on the rights and experiences of migrants,¹⁷⁹ and there may be other ad hoc examples of coordination of this type. DSP notes, however, that NGOs rarely have contact with their Community Welfare Service.¹⁸⁰

Community response forums (recently renamed community integration forums) represent a formal mechanism of coordination in this area. Community response forums were originally established to respond to the COVID-19 pandemic and were then repurposed to respond to arrivals of BOTPs from Ukraine to Ireland, with their remit being extended to IPAs.¹⁸¹ These forums bring together all public, community and voluntary organisations that provide support services locally. They are chaired by the chief executive or senior management within the local authority. Several stakeholders indicated that these forums provided a significant opportunity for improved coordination between government actors and NGOs, particularly when combined with the introduction of LAITs (see Section 2.4.2).¹⁸²

2.3.3 Inclusion in planning tools

Several NGOs noted that BIPs do not appear to be taken into account in national housing planning or housing policy, although a local authority representative flagged that they often have different needs to other populations, such as access to services and household sizes.¹⁸³ According to an IRC representative and IPAS, BIPs are included in housing planning once they get status and apply for social housing, in which case they are put on the social housing list if eligible.¹⁸⁴ DHLGH indicated that data collection through the Summary of Social Housing Needs Assessments now provides information on the level of social housing need among

¹⁷⁷ Interview with LGMA, September 2023.

¹⁷⁸ Interview with Crosscare, December 2023; Interview with the IRC, December 2023; Interview with the Peter McVerry Trust, March 2024.

¹⁷⁹ Interview with Crosscare, December 2023.

¹⁸⁰ Correspondence with DSP, February 2024.

¹⁸¹ Interview with LGMA, September 2023.

¹⁸² Interview with the Peter McVerry Trust, March 2024; Interview with LGMA, September 2023; Interview with local authority representative 2, December 2023.

¹⁸³ Correspondence with UNHCR Ireland representative, February 2024; Interview with local authority representative 1, December 2023.

¹⁸⁴ Meeting with IPAS, February 2024; Interview with the IRC, December 2023.

BIPs residing in IPAS accommodation, which will assist local authorities in forward planning for their projected accommodation requirements.¹⁸⁵

JRS Ireland similarly pointed out that BIPs were omitted from the Housing for All policy, and higher numbers of applicants (and therefore beneficiaries) than expected have arrived, which may not have been accounted for in targets.¹⁸⁶ A UNHCR Ireland representative highlighted the need to include BIPs in national housing planning and policy through the Irish planning system and its various layers (e.g., the Housing Needs Demand Assessment (HNDA), development plans, regional plans and the National Planning Framework).¹⁸⁷ They argued for the inclusion of everyone with permission to remain in county development plans, as well as in local authorities' housing need and demand assessments, which they stated is not currently the case.¹⁸⁸

However, DHLGH clarified that section 4 of the HNDA framework addresses the assessment of need for specialist provision for households requiring a specific housing solution suited to their needs, and that this section addresses sometimes complex issues, including IPAs who require temporary accommodation in the first instance. The Department stated that local authorities consider the available information on categories of specialised need and also estimate the total specialist need in their area, as well as that which is expected to arise over the period of the HNDA.¹⁸⁹ An IPAS representative further indicated that housing plans and social housing targets are based on social housing lists, suggesting that if BIPs are on these lists, they will be accounted for.¹⁹⁰ Finally, the IPAS representative explained that IPAS communicates numbers of IPAs and BIPs to local authorities, which should be captured in DHLGH targets.¹⁹¹

Therefore, while there seem to be mechanisms to take beneficiaries of international protection into account in housing planning and targets, targets based on previous trends or figures may not immediately respond to the significant increases in international protection applications (and BIPs) seen in the past few years. This is likely to be a challenge in the future, as the unpredictability in terms of the number of international protection applications may pose a challenge for long-term planning tools. In addition, mechanisms that rely on social housing lists could preclude a more proactive approach that recognises that a certain percentage of IPAs will get status and need housing solutions.

¹⁸⁵ Correspondence with DHLGH, April 2024.

¹⁸⁶ Correspondence with JRS, February 2024.

¹⁸⁷ Correspondence with UNHCR Ireland representative, February 2024.

¹⁸⁸ Correspondence with UNHCR Ireland representative, February 2024.

¹⁸⁹ Correspondence with DHLGH, March 2024.

¹⁹⁰ Meeting with IPAS, February 2024.

¹⁹¹ Meeting with IPAS, February 2024.

2.4 PLANNED DEVELOPMENTS

There are a number of key planned developments that stakeholders suggest may have significant impacts on BIPs' ability to transition into autonomous housing. These include the *White Paper to End Direct Provision*, and LAITs.

2.4.1 *White Paper to End Direct Provision*

As mentioned in Section 1.1.1, significant changes to the reception system were proposed in the 2021 *White Paper on Ending Direct Provision and to Establish a New International Protection Support Service* (updated by the Comprehensive Accommodation Strategy, March 2024). Theoretically, this model could support the transition to autonomous housing significantly, as under it applicants would get to experience independent living and be able to establish social networks more easily. This should reduce the negative psychological impacts of living in the current reception system. It would also mean that people would be already living autonomously in the community when they get their status. While these developments might have a positive effect on BIPs' ability to transition to, and access, autonomous housing, it is too early to assess the full extent of the impact of these measures.

2.4.2 Local Authority Integration Teams

As part of the implementation of the *White Paper to End Direct Provision*, local authorities are setting up a Local Authority Integration Team (LAIT) in each of the 31 local authorities, a development that is funded by DCEDIY. Initially, a four-person team will be recruited and employed by each local authority. The purpose of the integration support service will be to coordinate ongoing integration supports, information, advice and guidance to IPAs, BIPs and other refugees. This will primarily involve linking new arrivals with mainstream support services, ensuring their basic needs are met and facilitating independent living, where possible. The work of the LAITs is not intended to replace mainstream service provision in relation to integration, but to support new arrivals in accessing services appropriate to their needs.¹⁹² The teams will also coordinate and collaborate with the relevant agencies in providing support for accessing employment, childcare, healthcare services, and sporting and other local/community activities, as well as linking people with services to support them to develop English language proficiency (Murphy and Sheridan, 2023).

At time of writing, many local authorities were in the process of recruiting their LAIT. While these teams do not have a specific mandate to support with the transition to autonomous housing, a number of interviewees considered the introduction of LAITs as a positive development, suggesting that their general integration mandate and supports, as well as the likelihood of improved

¹⁹² Correspondence with LGMA, February 2024.

coordination, will likely improve the ability of BIPs to transition to autonomous housing.¹⁹³ The UNHCR Ireland representative also stressed the importance of the introduction of LAITs. However, they highlighted a potential problem in the fact that each local authority can have a maximum of four LAIT members, regardless of the level of demand or number of IPAs/BIPs in the area (see Figure 1.1, Section 1.1.1).¹⁹⁴ Similarly, the representative stressed the need to avoid duplication of the supports provided by NGOs, local development companies and others, and to promote consistency and clarity of the roles of these teams.¹⁹⁵ A representative from the Peter McVerry Trust noted that LAITs are already being very proactive in some local authorities, while in other local authorities, the positions have not yet been filled.¹⁹⁶

¹⁹³ Interview with LGMA representatives, September 2023; Interview with local authority representative 1, December 2023; Interview with Housing Agency representative, January 2024; Interview with IPAS, January 2024; Interview with local authority representative 2, December 2023; Correspondence with UNHCR Ireland representative, August 2023; Interview with the Peter McVerry Trust, March 2024.

¹⁹⁴ Written correspondence with UNHCR Ireland representative, March 2024.

¹⁹⁵ Written correspondence with UNHCR Ireland representative, March 2024.

¹⁹⁶ Interview with the Peter McVerry Trust, March 2024.

CHAPTER 3

Challenges and good practices in support provision

A number of factors were found to hinder the provision of support to beneficiaries of international protection (BIPs) in accessing autonomous housing in Ireland. Here, we outline both challenges that service providers face in the provision of support (Section 3.1) and good practices identified in support provision (Section 3.2).

3.1 CHALLENGES TO PROVIDING SUPPORT

3.1.1 The housing crisis

The current housing market, specifically its lack of available housing, was reported by most stakeholders as a major challenge to support provision,¹⁹⁷ one that meant that non-governmental organisations (NGOs) working on the provision of housing support often saw quite poor outcomes. Two NGOs noted that as a result of this they either no longer provide this service or decided not to expand this aspect of their support services.¹⁹⁸ The Irish Refugee Council (IRC) reported that high demand for their support led them to start group workshops on this subject, while a representative of UNHCR Ireland noted the limitations of support services in the face of ‘significant structural challenges’.¹⁹⁹

Several stakeholders mentioned that the housing crisis made it more difficult to enforce and realise certain rights for BIPs. For example, according to one of the housing policy researchers and Crosscare, the competitiveness of the housing market has made it difficult to prove cases of possible discrimination by a landlord against a prospective tenant based on their Housing Assistance Payment (HAP) status or on other protected characteristics, such as ethnicity.²⁰⁰

There can be a mismatch between the composition of those seeking social housing and local authority stock, which doesn’t sufficiently account for single people or larger families.²⁰¹ Both a local authority representative and the IRC suggested that there is often a mismatch between local authority housing stock and the family composition of BIPs, among whom there is a higher proportion of larger families than found in the general population.²⁰² This issue may be exacerbated by certain

¹⁹⁷ Interview with IPAS, January 2024; Interview with Crosscare, December 2023; Interview with housing policy researcher A, December 2023; Interview with housing policy analyst, December 2023; Interview with the IRC, December 2023; Interview with Nasc, November 2023; Correspondence with AkiDwA, March 2024; Interview with the Peter McVerry Trust, March 2024.

¹⁹⁸ Interview with Nasc, November 2023; Interview with Crosscare, December 2023.

¹⁹⁹ Correspondence with a representative of UNHCR Ireland, March 2024.

²⁰⁰ Interview with housing policy researcher A, December 2023; Interview with Crosscare, December 2023

²⁰¹ Interview with housing policy researcher A, December 2023; Interview with housing policy researcher B, March 2024.

²⁰² Interview with the IRC, December 2023; Interview with local authority representative 1, December 2023.

challenges faced regarding the inclusion of BIPs in long-term housing planning (see Section 2.3.3).

3.1.2 Lack of resources and staff turnover

A number of NGOs reported that allocated resources are insufficient to meet the levels of demand and need in the current context.²⁰³ As previously mentioned (Section 2.2.2), commissioned supports from the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) to Depaul and the Peter McVerry Trust provide for one caseworker for every 185 people trying to transition from International Protection Accommodation Services (IPAS) accommodation.²⁰⁴ While the Peter McVerry Trust indicated that the service was overstretched, they also stated that not all BIPs engage with the service.²⁰⁵ Other NGOs felt that, in their experience, these are high numbers per caseworker, leaving the caseworkers overstretched and unable to dedicate the amount of time needed for effective transition.²⁰⁶ In regards to supports provided by other NGOs, Crosscare, Nasc and the IRC all indicated that they face challenges related to their staffing levels either staying the same or decreasing, in spite of a significant increase in international protection applicants (IPAs) and BIPs, which has led to a growth in demand for their services.²⁰⁷ The same NGOs reported that, given current levels of demand and their limited resources, supporting people to access social housing lists has become challenging; it is a labour-intensive process that requires significant one-on-one support and follow-up.²⁰⁸

Recruitment of staff, a high rate of turnover, and finding staff with the necessary skills were all identified as challenges by several stakeholders, in particular in relation to frontline staff in local authorities.²⁰⁹ One aspect of this challenge is the relative novelty of this issue in Ireland, resulting in a limited pool of candidates with the skills and expertise needed to fill the available roles; there are no clear education or career paths for this line of work, according to an IPAS representative.²¹⁰ Difficulties recruiting staff were also identified by the Local Government Management Agency (LGMA) as a barrier to the provision of some services.²¹¹

²⁰³ Interview with Crosscare, December 2023; Interview with the IRC, December 2023; Interview with Nasc, November 2023.

²⁰⁴ Interview with IPAS, January 2024.

²⁰⁵ Interview with the Peter McVerry Trust, March 2024.

²⁰⁶ Interview with the IRC, December 2023; Interview with Crosscare, December 2023,

²⁰⁷ Interview with Crosscare, December 2023; Interview with the IRC, December 2023; Interview with Nasc, November 2023.

²⁰⁸ Interview with Nasc, November 2023; Interview with Crosscare, December 2023; Interview with the IRC, December 2023.

²⁰⁹ Interview with LGMA representatives, September 2023; Interview with the IRC, December 2023; Interview with Crosscare, December 2023; Interview with Nasc, November 2023; Interview with Housing Agency representative, January 2024.

²¹⁰ Interview with IPAS, January 2024.

²¹¹ Interview with LGMA, September 2023.

In regard to staff turnover within local authorities, the LGMA highlighted that there are currently significant challenges across the local authority sector in relation to attracting and retaining staff; this has resulted in gaps in institutional knowledge.²¹² Crosscare, AkiDwA, Nasc and the IRC reported that this issue has often resulted in local authority staff who have no clear policy guidance and limited knowledge of the rights and entitlements of BIPs, and of the many nuances of administrative processes, such as those around exceptions to documentation.²¹³ While these NGOs explained that they sought to assist staff to better understand this area, high turnover meant that they had to do this repeatedly.²¹⁴

The Housing Agency highlighted the further major challenge of short-term funding for projects, which means that local authorities or NGOs lose people with institutional knowledge because their contracts often end when the projects end.²¹⁵

Some interviewees also indicated that a lack of resources for local authorities and frontline services put them under significant strain and made it much more difficult for them to meet the needs of those with additional disadvantage or needs (see Section 4.2.2.3).²¹⁶

3.1.3 Administrative barriers

NGO interviewees highlighted some administrative barriers that they experienced when providing support. One was a situation whereby individuals fell between the mandate of DCEDIY and that of the relevant local authority, with each party claiming that the provision of accommodation was the responsibility of the other party. Often this arose when a beneficiary of international protection (BIP) had been issued with a transfer decision (under the recent DCEDIY policy to transfer people who have had status for 12 months for single people and 24 months for families, see Section 1.1.1) but refused the decision (often due to being transferred from where they may have employment, social networks, and links with services),²¹⁷ and thus had to leave IPAS accommodation. In such cases, local authorities argued that the BIP had an offer of accommodation and were therefore not entitled to emergency homelessness accommodation. However, the BIP also

²¹² Interview with LGMA, September 2023.

²¹³ Interview with Crosscare, December 2023; Interview with the IRC, December 2023; Interview with AkiDwA, December 2023; Correspondence with Nasc, March 2024.

²¹⁴ Interview with Crosscare, December 2023; Interview with the IRC, December 2023.

²¹⁵ Interview with Housing Agency representative, January 2024, January 2024.

²¹⁶ Interview with housing policy analyst, December 2023; Interview with housing policy researcher A, December 2023; Interview with Crosscare, December 2023; Interview with local authority representative 1, December 2023.

²¹⁷ Correspondence with the IRC, March 2024.

loses their right to IPAS accommodation if they refuse the transfer offer. Five NGOs consulted had experienced this problem.²¹⁸

Several interviewees also indicated that the approach taken by local authorities to BIPs who wish to access housing can amount to a significant challenge. Areas flagged included:

- Lack of clarity/knowledge on the rights and entitlements of BIPs among frontline workers in local authorities, as well as a lack of cultural knowledge or understanding of the backgrounds of BIPs;²¹⁹
- The inability to make in-person appointments for social housing applications in some local authorities, which makes it more difficult for BIPs to make applications, leading to their need for more support;²²⁰
- Delays in assessing social housing applications and multiple document requests on applications, often for the same document or documents that have already been provided, again with the result of additional support being required from NGOs;²²¹ and
- The application of the local connection test to BIPs for social housing supports (see Section 4.2.2) and access to emergency homeless accommodation (see Sections 2.1.3 and 4.2.2.10).

Mercy Law Resource Centre indicated that there is no mechanism to track refusals of access to the social housing list to better understand these practices.²²²

3.1.4 Lack of coordination/communication between actors

A lack of coordination between different actors was flagged. For example, three NGOs described a situation whereby an applicant was asked by a local authority for a letter from IPAS confirming that they no longer had accommodation through IPAS, but then faced challenges or delays in obtaining this IPAS letter through public channels.²²³ However, it should be noted that an IPAS representative and the IRC indicated that all previous residents can email the IPAS general inbox and receive a confirmation email that they are no longer entitled to accommodation with IPAS.²²⁴ According to two IRC representatives, the key issue is a delay in

²¹⁸ Interview with the IRC, December 2023; Interview with Crosscare, December 2023; Interview with Nasc, November 2023; Correspondence with JRS, February 2024; correspondence with Mercy Law Resource Centre, April 2024.

²¹⁹ Interview with LGMA, September 2023; Interview with the IRC, December 2023; Interview with Crosscare, December 2023; Interview with AkiDwA, December 2023; Correspondence with Mercy Law Resource Centre, April 2024; Correspondence with Nasc, March 2024.

²²⁰ Interview with Crosscare, December 2023.

²²¹ Interview with the IRC, December 2023; Interview with Crosscare, December 2023; Correspondence with Nasc, March 2024. Nasc also indicated that, in their experience, some local authorities have requested 'affidavits' from BIPs confirming that they do not have property in other countries.

²²² Correspondence with Mercy Law Resource Centre, April 2024.

²²³ Interview with Crosscare, December 2023; Correspondence with Nasc, March 2024; Correspondence with AkiDwA, March 2024.

²²⁴ Meeting with IPAS representative, February 2024; Correspondence with the IRC, March 2024.

receiving this letter. Despite the urgent circumstances, it can take up to two weeks before this email is received.²²⁵

Interviewees flagged a lack of communication between DCEDIY and local authorities, for example in the transfer of international protection applicants (IPAs) into the area.²²⁶ One local authority interviewed said that while DCEDIY had been informing local Health Service Executive (HSE) teams of new arrivals, they had not been informing the local authority, leading to challenges for local authorities in planning for potential impact on services.²²⁷ A new community engagement team that has been established in DCEDIY to communicate with local authorities about the opening of new centres may help to rectify this issue.²²⁸

The Department of Social Protection (DSP) indicated that there is a need to increase communication and coordination with the Community Welfare Service, which assesses Additional Needs Payments, notably for new accommodation kit-outs (see Section 2.1.4). They indicated the need to communicate the volume and location of new housing for IPAs/BIPs. They also noted that several of the coordination and communication forums discussed in Section 2.3.1 did not involve the Community Welfare Service of DSP.²²⁹ DSP reported that coordination with other areas, such as transport, may be an issue, with IPAs and BIPs struggling to attend appointments because of a lack of transport options.²³⁰

Issues of coordination between local authorities (responsible for social housing) and other government departments were also flagged. One such issue was the fact that permission letters, which evidence the granting of international protection status have changed multiple times. However, local authorities do not receive information about these changes, which can lead to confusion and even to BIPs being blocked from accessing their rights.²³¹ While the Department of Justice reported that clarification of changes to permission letters can be obtained through the Ministerial Decisions Unit by any state service provider,²³² stakeholders suggested that this information was often not clear to frontline providers.²³³ There is also a need to update Housing Circular 41/2012 to reflect updates in international protection law (see Box 1.3, Section 1.1.4).

A more general coordination issue identified is the lack of information provided to local authorities and frontline workers by government departments on the rights

²²⁵ Correspondence with the IRC, March 2024.

²²⁶ Interview with local authority representative 1, December 2023; Interview with local authority representative 2, December 2023.

²²⁷ Interview with local authority representative 1, December 2023.

²²⁸ Meeting with IPAS, February 2024.

²²⁹ Correspondence with DSP, March 2024.

²³⁰ Correspondence with DSP, March 2024.

²³¹ Interview with the IRC, December 2023; Correspondence with Mercy Law Resource Centre, April 2024.

²³² Correspondence with the Department of Justice, February 2024.

²³³ Interview with Crosscare, December 2023; Interview with the IRC, December 2023.

and entitlements of BIPs, as well as exemptions from document requirements. NGOs who support people trying to access social housing lists suggested that such shortcomings result in BIPs being asked questions related to their immigration status and arrival into the country, and being asked for documents that they are actually exempt from having to provide.²³⁴

DSP also flagged a lack of communication with Community Welfare Services about initial dispersal of people and changes of accommodation. They indicated that communication with the Community Welfare Service in relation to changes of accommodation could enable the change of payments that are in place to a new location in a timely manner, which would prevent people being left without funds.²³⁵

3.1.5 Inconsistent approaches among local authorities

Almost all interviewees indicated that practices differed widely between local authorities.²³⁶ Inconsistencies identified included the application of the local connection test to social housing assessments and local authority emergency accommodation, approaches to family reunification, and documentation requested.²³⁷ One local authority representative stated, for example, that while a team for temporary protection had been established, and other local authorities appeared to have specific experience of working with BIPs, there were no designated staff for international protection.²³⁸

A further issue that can arise, particularly in the context of IPAS transfers of BIPs to emergency accommodation in different local authorities (see Sections 1.1.1 and 4.2.2.6), is the refusal and/or reluctance of local authorities to grant inter-authority movement for the use of HAP (see Section 2.1.2.1).²³⁹

Mercy Law Resource Centre noted that there can be regional variations in terms of priorities set and the manner of administering waiting lists, and that in some local authorities, there can be a certain level of opaqueness in relation to the process.²⁴⁰

²³⁴ Interview with Crosscare, December 2023; Interview with the IRC, December 2023; Interview with AkiDwA, December 2023; Correspondence with Mercy Law Resource Centre, April 2024; Correspondence with Nasc, March 2024.

²³⁵ Correspondence with DSP, April 2024.

²³⁶ Interview with IPAS, January 2024; Interview with local authority representative 1, December 2023; Interview with Crosscare, December 2023; Interview with the IRC, December 2023; Interview with Nasc, November 2023; Interview with housing policy analyst, December 2023; Interview with housing policy researcher A, December 2023; Interview with the Peter McVerry Trust, March 2024.

²³⁷ Interview with Nasc, November 2023.

²³⁸ Interview with local authority representative 1, December 2023; Interview with local authority representative 2, December 2023.

²³⁹ Meeting with IPAS, March 2024; Interview with a representative from the Peter McVerry Trust, March 2024.

²⁴⁰ Correspondence with Mercy Law Resource Centre, April 2024.

3.1.6 Inclusion of BIPs in forecasting

As highlighted in Section 2.3.3, planning tools may not always proactively consider BIPs (or IPAs who may become BIPs). A local authority representative suggested that this issue may contribute, in part, to current discrepancies between housing stock and the needs of BIPs (see Section 2.3).²⁴¹ This can represent a significant challenge for those trying to provide support, as there may be very limited availability of the type of housing needed. This is reflective of a broader challenge relating to the mismatch between housing needs and the housing stock.²⁴²

3.1.7 BIP engagement with services

A representative from the Peter McVerry Trust noted that the service sometimes identifies engagement issues among BIPs, which are reported back to IPAS.²⁴³ They observed that disengagement can arise due to people's prioritisation of other aspects of their lives (e.g., employment, other personal obligations etc.). These caseworkers work office hours, which may limit the capacity of some people to engage with the service. This interviewee found that receipt of transfer letters increased some people's level of engagement with the service (see Section 4.2.2.6 for more information).²⁴⁴

3.2 RESPONDING TO CHALLENGES AND GOOD PRACTICES

While a number of good practices were reported, it should be noted that many are yet to be implemented, or do not apply to BIPs. However, they may provide useful frameworks that could be applied to BIPs.

3.2.1 White Paper to End Direct Provision

The model set out in the *White Paper to End Direct Provision and to Establish a New International Protection Support Service* (described in Section 2.4.1) has been identified as potential good practice in this area, as it addresses several of the identified barriers,²⁴⁵ including: the isolation of IPAS accommodation; institutionalisation and integration into a community where BIPs may not be able to access housing; and supply of housing for this group.²⁴⁶

3.2.2 Local Authority Integration Teams

The new LAITs (described in Section 2.4.2) were identified as a positive new measure as they have long-term funding and will provide dedicated support and

²⁴¹ Interview with local authority representative 1, December 2023.

²⁴² Interview with local authority representative 1, December 2023; Interview with housing policy researcher A, December 2023.

²⁴³ Interview with a representative from the Peter McVerry Trust, March 2024.

²⁴⁴ Interview with a representative from the Peter McVerry Trust, March 2024.

²⁴⁵ Hereafter in this chapter this is referred to as the *White Paper to End Direct Provision* for brevity.

²⁴⁶ Interview with LGMA, September 2023; Interview with IPAS, January 2024; Interview with Crosscare, December 2023.

coordination in each local authority.²⁴⁷ While LAITs have no formal role in sourcing housing, they can provide guidance in access to services and aim to improve integration outcomes, which may have an impact on access to housing. The representative of the Housing Agency suggested that a good practice would be for these teams to link in with existing housing supports, including innovations around homelessness such as Homeless Action Teams.²⁴⁸ Nasc noted that where LAITs sit within local authorities varies, which may impact their work or coordination.²⁴⁹

3.2.3 Inter-departmental working groups

The Cabinet Committee on Humanitarian Response to Ukraine in the Department of the Taoiseach was identified as an example of good practice in relation to coordination, though it does not apply to BIPs.²⁵⁰ This committee was set up to assist with ensuring a whole-of-government response to the arrival of BOTPs. Members included relevant ministers, such as the Taoiseach and Tánaiste; the Minister for Housing, Local Government, and Heritage; the Minister for Children, Equality, Disability, Integration and Youth; the Minister for Social Protection; the Minister for Justice; and the Minister for Public Expenditure, among others.²⁵¹

3.2.4 Multiagency/multistakeholder approach

Several stakeholders highlighted that multi-stakeholder and multi-agency approaches represent good practice for this area, highlighting multiple examples of such approaches. A local authority representative highlighted the multi-agency and multi-stakeholder approach taken towards resettled refugees, for example, noting that it enables a holistic approach to integration by providing links to various services and caseworkers (see Box 4.1).²⁵² Other stakeholders highlighted the multi-stakeholder approach taken towards BOTPs, through community response forums (see Section 3.2.5 below) or through county coordination teams and local area response teams set up in some local areas to coordinate access to services for BOTPs.²⁵³

The Housing Agency identified good practice in relation to innovations in coordination in the area of homelessness more generally. One example of this is found in the Homeless Action Teams, which have been set up around the country, who hold case management meetings. The potential for these to be linked in with teams working on housing for BIPs was noted. Another highlighted example is the

²⁴⁷ Interview with LGMA representatives, September 2023; Interview with local authority representative 1, December 2023; Interview with IPAS, January 2024; Interview with the Peter McVerry Trust, March 2024.

²⁴⁸ Interview with representative of the Housing Agency, January 2024.

²⁴⁹ Correspondence with Nasc, March 2024.

²⁵⁰ Interview with LGMA representatives, September 2023 .

²⁵¹ See Department of the Taoiseach (2023). 'Cabinet Committees of the 33rd Government', 23 January, www.gov.ie; Department of An Taoiseach (2023). 'Membership of Cabinet Committees of the 33rd Government', 23 January, www.gov.ie.

²⁵² Interview with local authority representative 1, December 2023.

²⁵³ Interview with local authority representative 2, December 2023.

co-location of homelessness NGO staff within local authority offices to support coordination and collaboration.²⁵⁴

Several of the interviewees highlighted one key benefit of the multi-agency or multi-stakeholder approach: it enables services to look holistically at the short-, medium- and long-term needs of individuals, which can relate to many different services, such as learning the English language, employment, education, housing, orientation, legal support, social networks, recreation, and access to social welfare.²⁵⁵

The Housing Agency representative noted another good practice: underpinning collaboration with formal agreements and protocols, so that agencies agree on processes for collaboration and ensure that collaboration survives specific interpersonal relationships.²⁵⁶ As mentioned in Section 2.3, there are several potential areas where this could improve collaboration and coordination on supporting access to autonomous housing for BIPs.

3.2.5 Community response forums

Community response forums (now community integration forums, see Section 2.3.2) were identified as a model of good practice by the LGMA and a representative of a local authority.²⁵⁷ These forums enable a coordinated civil society and local governance response to challenges,²⁵⁸ in particular for complex challenges that benefit from the input of multiple stakeholders and service providers, such as transitioning BIPs to autonomous housing. These forums, funded by DCEDIY, act as a collaborative network and working group for the supports being provided. Driven and chaired by the chief executive of each relevant local authority, the group consists of representatives of key stakeholder organisations and service providers at local level.²⁵⁹

3.2.6 Increased sharing of data

Both the LGMA and a local authority representative identified as good practice the way in which DCEDIY provides local authorities with data on where people with

²⁵⁴ Interview with Housing Agency representative, January 2024.

²⁵⁵ Interview with local authority representative 1, December 2023; Interview with Housing Agency representative, January 2024; Interview with local authority representative 2, December 2023; Interview with housing policy analyst, December 2023; Interview with AkiDwA, December 2023.

²⁵⁶ Interview with Housing Agency representative, January 2024.

²⁵⁷ Interview with the LGMA, September 2023; Interview with local authority representative 2, December 2024.

²⁵⁸ Department of Rural and Community Development (2022). 'Community Response Forum in each area to coordinate local measures welcoming Ukrainians', 4 April.

²⁵⁹ Correspondence with LGMA, February 2024.

status are being housed, as well as relevant demographic information, so that they can plan and provide services.²⁶⁰

3.2.7 Rapid build housing

The UNHCR Ireland representative highlighted the Government's rapid build housing programme as an interesting approach to addressing housing challenges. While this programme is part of the State's humanitarian response to the Ukrainian crisis, they noted that it may provide lessons relevant to housing BIPs.²⁶¹ The programme aims to provide short-term accommodation to 2,000 Ukrainians in several sites across Ireland.²⁶² The development of these units was covered under the planning exemption for BOTPs (Murphy and Sheridan, 2023). As of 31 December 2023, 310 rapid build units were available for use by BOTPs, and 1,240 people had moved into rapid build houses (Stapleton and Dalton, 2024).

3.2.8 Extended stays in IPAS accommodation

The UNHCR Ireland representative emphasised that although IPAS is not legally obliged to continue to provide accommodation to BIPs, it does so for extended periods of time and provides supports to help them to transition.²⁶³ This gives them time and support to find accommodation in a challenging housing market.

²⁶⁰ Interview with LGMA representatives, September 2023; Interview with local authority representative 2, December 2023.

²⁶¹ Correspondence with UNHCR Ireland representative, March 2024.

²⁶² Department of Taoiseach. (2024). *Rapid build housing*, <https://www.gov.ie/en/publication/ef882-rapid-build-housing/>.

²⁶³ Correspondence with UNHCR Ireland representative, March 2024.

CHAPTER 4

Access: Outcomes and barriers

This chapter turns to the practical reality for BIPs seeking to access autonomous housing. It is notable that several interviewees indicated that the barriers and problems they face in this regard have worsened significantly in recent years,²⁶⁴ particularly since 2019. According to Crosscare: ‘things having gone backwards’ with ‘better practice around almost every aspect of this [issue] in 2016 than now.’²⁶⁵ This perspective is backed up by data; most recently, homelessness data from December 2023 demonstrate that 20% of new single presentations to the Dublin Regional Homeless Executive (DRHE) came directly from International Protection Accommodation Services (IPAS) accommodation, marking a 9% increase from June 2023 (DRHE, 2023).²⁶⁶

The deterioration of the situation has been primarily attributed to worsening conditions in the housing market and heightened pressure on frontline services (see Section 1.2.2), rather than explicit policy changes.²⁶⁷ A representative from the Irish Refugee Council (IRC) also stressed an ‘alarming’ rise in homelessness among BIPs since 2016, due to a reliance on the private rental market and the Housing Assistance Payment (HAP) as the primary means of people moving out of IPAS accommodation centres, as well as the current policy of transferring beneficiaries of international protection (BIPs) to different accommodation after they have had status for one to two years.

Other stakeholders attributed the worsening situation to the increasing numbers of IPAs.²⁶⁸ This increase, alongside increased processing capacity in the International Protection Office (IPO), has led to a significant increase in the rate at which people are being granted international protection, which leads to an increase in the number of BIPs trying to exit IPAS accommodation.²⁶⁹ This has happened at the same time as significant pressure has been placed on services as a result of arrivals from Ukraine.²⁷⁰ Representatives from the Jesuit Refugee Service (JRS Ireland) and the IRC, however, suggested that the deterioration was largely a

²⁶⁴ Interview with Crosscare, December 2023; Interview with housing policy analyst, December 2023; Interview with the IRC, December 2023; Correspondence with AkiDwA, March 2024.

²⁶⁵ Interview with Crosscare, December 2023.

²⁶⁶ It should be noted that these figures do not include people who have been in IPAS, found autonomous housing or another housing solution and then became homeless (Correspondence with the IRC, March 2024).

²⁶⁷ Interview with Crosscare, December 2023; Interview with housing policy analyst, December 2023; Interview with AkiDwA, December 2023.

²⁶⁸ Correspondence with UNHCR Ireland representative, March 2024.

²⁶⁹ Meeting with IPAS, February 2024.

²⁷⁰ Meeting with IPAS, February 2024; Interview with local authority representative 2, December 2023; Interview with LGMA, September 2023.

result of policy failures to adjust plans to the increased demand, and a reliance on short-term, market-based solutions.²⁷¹

4.1 OUTCOMES

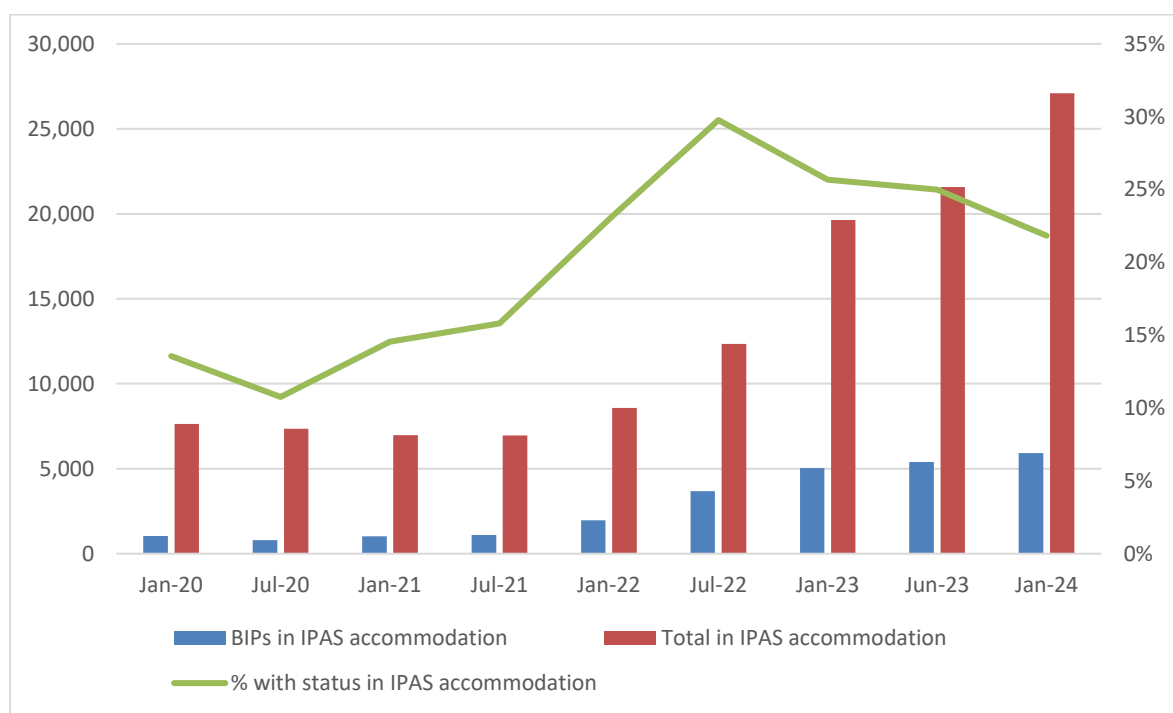
4.1.1 Can BIPs access autonomous housing?

BIPs face significant challenges to accessing autonomous housing, with consequences for outcomes in this area. This is evident from the number of people in IPAS accommodation who have status and are therefore no longer entitled to reception conditions, and can theoretically transition into other housing options.

Figure 4.1 shows the number of people with status in IPAS accommodation compared with the total. It also shows the percentage of the total in IPAS accommodation with status over time. It demonstrates that approximately 22% of those in IPAS accommodation had been granted status as of January 2024 (5,914 of a total number of persons of 27,092 in IPAS accommodation), a significant increase from 2020, when around 14% of those in IPAS accommodation had status, but a decrease from the peak of almost 30% in July 2022. A decrease in the percentage is also evident between June 2023 and January 2024, although this seems to largely be a result of a significant increase in the total number of IPAS residents and a smaller increase in those with status.

²⁷¹ Correspondence with the JRS, September 2023; Correspondence with the IRC, March 2024.

FIGURE 4.1 PEOPLE WITH STATUS IN IPAS ACCOMMODATION AS A PERCENTAGE OF THE TOTAL NUMBER OF PEOPLE IN IPAS ACCOMMODATION, 2020–2024



Source: Correspondence with DCEDIY, February 2024; DCEDIY (2024). ‘IPAS monthly statistics January 2024’.

Most NGOs interviewed indicated that BIPs do not have meaningful access to autonomous housing, due to the significant barriers they face and challenges in the current housing market in Ireland, in particular in recent years.²⁷² Crosscare indicated that during the COVID-19 pandemic, there was a brief period in which BIPs were able to move out of IPAS accommodation, but that there is significantly less availability in the market recently.²⁷³ This trend is supported by data on rental properties, which indicate that more properties were available to rent during the pandemic, but that the rate has since plummeted to significantly below pre-pandemic levels (Daft.ie, 2023). The representative of Crosscare indicated that the likelihood of accessing autonomous housing has grown very low, to the point that they now focus on supporting people in accessing mainstream homeless accommodation.²⁷⁴

Until [the problem of supply is resolved], the best a non-governmental organisation (NGO) can do is provide a compassionate service to hold people’s hand in transitioning to mainstream homelessness accommodation.²⁷⁵

²⁷² Interview with Crosscare, December 2023; Interview with the IRC, December 2023; Interview with Nasc, November 2023; Interview with AkiDwA, December 2023; Correspondence with JRS, February 2024.

²⁷³ Interview with Crosscare, December 2023; Interview with housing policy analyst, December 2023; Interview with the IRC, December 2023.

²⁷⁴ Interview with Crosscare, December 2023.

²⁷⁵ Interview with Crosscare, December 2021.

A housing policy researcher indicated that this is indicative of a wider problem, one that is also faced by other groups such as Travellers.²⁷⁶ However, the UNHCR Ireland representative suggested that NGOs may only encounter BIP cases where the individual or family is facing significant struggles in accessing accommodation; that they are less likely to come into contact with those who can access accommodation independently.²⁷⁷ At the same time, they acknowledged that there is currently a ‘very acute pinch point’ but felt it was unclear as to whether it will be a temporary or longer-term one.²⁷⁸

According to the Department of Children, Equality, Disability, Integration and Youth (DCEDIY), 733 people progressed from IPAS accommodation into housing in the community in 2022.²⁷⁹ The corresponding figure for 2023 is approximately 2,000.²⁸⁰ These figures suggest that some BIPs are able to access some form of housing solution, a conclusion that was supported by comments from the Peter McVerry Trust.²⁸¹ The representative of UNHCR Ireland also noted that since the 1990s all BIPs have eventually moved into housing in the community, and that most integrate fully into their community, become Irish citizens and live in Ireland for a long time.²⁸² Nevertheless, Crosscare stressed that the quality of initial housing may be poor or that BIPs may simply be staying with friends before accessing emergency homeless accommodation.²⁸³ In the former case, according to the European Typology of Homelessness and Housing Exclusion (ETHOS), these people would be considered to be living in insecure housing, a form of housing exclusion (Feantsa, n.d.). Several NGOs also raised concerns about the quality of tenancies and the adequacy of housing for reunified families; both factors can lead BIPs to later fall into homelessness.²⁸⁴

Figure 4.2 shows the length of time people have been in IPAS accommodation with status as of 31 January 2024. The figure indicates that 14% of BIPs in IPAS accommodation have had status for over two years. It should be noted that the IPAS representative reported that some of those with status in IPAS accommodation for over three years may not be capable of independent living or may have specific family make-ups for which it is very difficult to find housing; for example, medical issues and associated healthcare needs might give rise to specific housing requirements.²⁸⁵ However, the figure also indicates that the majority of

²⁷⁶ Interview with housing policy researcher B, March 2024.

²⁷⁷ Correspondence with UNHCR Ireland, March 2024.

²⁷⁸ Correspondence with UNHCR Ireland, March 2024.

²⁷⁹ Correspondence with DCEDIY, 3 February 2024.

²⁸⁰ Interview with IPAS, January 2024.

²⁸¹ Interview with the Peter McVerry Trust, March 2024.

²⁸² Written correspondence with UNHCR Ireland representative, March 2024.

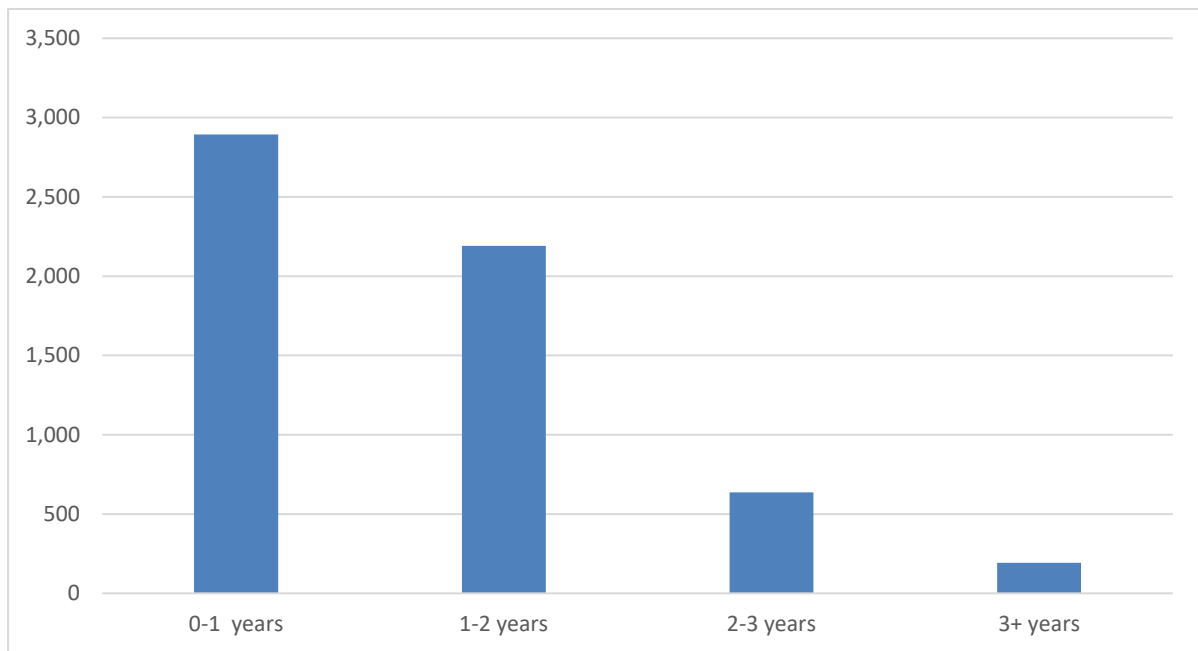
²⁸³ Interview with Crosscare, December 2023; Correspondence with Nasc, April 2024.

²⁸⁴ Interview with Nasc, November 2023; Interview with Crosscare, December 2023; Interview with the IRC, December 2023.

²⁸⁵ Meeting with IPAS representative, February 2024.

those with status have been there for less than two years, suggesting that many are able to move on.

FIGURE 4.2 LENGTH OF TIME BIPS SPENT IN IPAS ACCOMMODATION AS OF 31 JANUARY 2024



Source: Correspondence with DCEDIY, February 2024.

4.1.2 Is housing adequate?

Beyond access to housing, it is crucial to look at the adequacy of housing accessed by BIPs. A limited body of literature has examined the question of adequacy of housing for migrants in Ireland. In an Economic and Social Research Institute (ESRI) analysis of 2016 census data, McGinnity et al. (2022) found that migrants in general are much less likely to live in owner-occupied accommodation, much more likely to live in private rented housing, and much more likely to live in overcrowded housing (20% of migrants versus 8% of Irish-born). They found that some groups of migrants were particularly likely to live in overcrowded housing. This includes those from: eastern Europe; Central and South America; the Middle East and North Africa (MENA) region; other African countries; and South Asia and East Asia (McGinnity et al., 2022). The *Monitoring report on integration* (McGinnity et al., 2023) also showed that those born outside of Ireland had higher levels of housing affordability issues and at-risk-of-poverty rates after housing in 2020 and 2021 (pooled), with non-EU migrants showing the worst outcomes. However, the data in these reports were not disaggregated by the type of migration permission and therefore it is not possible to draw conclusions about BIPs specifically.

However, McGinnity et al. (2022) attempted to estimate the likelihood of someone having arrived through the protection system and the impact this has on their housing outcomes (McGinnity, et al., 2022). They found that this factor is associated with overcrowding, and that those likely to have arrived through the

protection system are much more likely to be living in social housing (McGinnity, et al., 2022, p. 64).

In Ireland, there are currently no mechanisms to verify the adequacy of autonomous housing accessed by BIPs specifically. The UNHCR Ireland representative highlighted the need for information on how people are faring having progressed from IPAS accommodation and their post-transition situations.²⁸⁶ However, there are mainstream mechanisms to assess the adequacy of social housing and private rented accommodation, with data indicating that many houses inspected do not meet minimum standards set out in regulations (see Section 2.1.4). In line with this, stakeholders indicated BIPs were at risk of accessing inadequate housing, including:

- Poor standard housing (e.g., issues with damp, size, suitability for tenants' needs);²⁸⁷
- Housing that was not adequate for the size of the eventual family, as it did not take family reunification into account;²⁸⁸
- Housing with low quality/insecure tenancies (i.e., no formal contract, no registration with the Residential Tenancies Board (RTB), very short-term contract, cash only etc.),²⁸⁹ which can also affect access to other supports, such as social housing supports,²⁹⁰ and
- Rents that cost more than the limits set by the HAP scheme.²⁹¹

AkiDWA added that the level of competition in the market and the desperate situation BIPs can find themselves in, in relation to housing, has resulted in people often accepting housing with very poor living conditions or with low-quality/insecure tenancies.²⁹²

4.2 BARRIERS TO ACCESS

Barriers faced by BIPs to accessing autonomous housing fall into two categories: systemic barriers and barriers relating to the characteristics of BIPs. It should be noted that these categories are interdependent; pre-existing characteristics can make systemic barriers more impactful, and vice versa. The association between mainstream issues and those specific to BIPs emerged clearly from the data collection for this research, and this should be kept in mind throughout this section.

²⁸⁶ Written correspondence with UNHCR Ireland representative, March 2024.

²⁸⁷ Interview with the IRC, December 2023; Interview with Crosscare, December 2023.

²⁸⁸ Interview with Nasc, November 2023; Interview with the IRC, December 2023; Interview with local authority representative 1, December 2023.

²⁸⁹ Interview with Nasc, November 2023; Interview with Crosscare, December 2023.

²⁹⁰ Correspondence with Nasc, March 2024.

²⁹¹ Interview with the IRC, December 2023.

²⁹² Interview with AkiDWA, December 2023.

4.2.1 Barriers relating to BIP characteristics

4.2.1.1 Discrimination

There is a significant body of research indicating that migrants and those from ethnic minorities experience discrimination in the Irish housing market (Gusciute et al., 2022; Grotti et al., 2018). BIPs are often ethnic minorities, and this characteristic as well as their immigration status and HAP status were identified as grounds against which BIPs are discriminated in the housing market.²⁹³ The Peter McVerry Trust representative suggested that people can also face discrimination simply by virtue of the fact that they are coming from IPAS accommodation.²⁹⁴ Although the Equality (Miscellaneous Provisions) Act 2015 prohibits discrimination of prospective tenants based on their ethnicity or welfare status, research indicates that discrimination based on welfare status (receipt of HAP) remains an issue (Bieri, 2024; Finn and Mayock, 2021; Hearne and Murphy, 2017).

4.2.1.2 Language barriers, access to information and social networks

Those seeking to transition from IPAS accommodation often do not speak fluent English or do not speak English as their first language, which can lead to challenges in advocating for themselves, and communication barriers in interactions with the social welfare system, as well as with landlords and agencies.²⁹⁵ Several NGOs and a housing policy analyst identified this as a particular challenge in a very competitive housing market, where any disadvantage (such as delays in responding to ads because of language barriers) can have major consequences for housing outcomes.²⁹⁶

Other challenges that can serve to limit access to autonomous housing include a lack of knowledge and understanding of local housing markets (McGinnity et al., 2022) and the social protection system.²⁹⁷ A lack of information provision for those living in IPAS accommodation has also been reported by NGOs (Crosscare Refugee Service, 2018).²⁹⁸ For example, a representative from the Department of Social Protection (DSP) flagged that their Community Welfare Service often receives claims for items that they understand to be in the remit of other

²⁹³ Interview with Crosscare, December 2023; Interview with housing policy researcher A, December 2023; Interview with Nasc, November 2023; Interview with AkiDwA, December 2023; Interview with the IRC, December 2023; Interview with the Peter McVerry Trust March 2024; See also McGinnity, et al. (2022) and Finn (2015).

²⁹⁴ Interview with the Peter McVerry Trust, March 2024.

²⁹⁵ Correspondence with Doras, September 2023. Interview with Nasc, November 2023; Interview with AkiDwA, December 2023; Interview with Crosscare, December 2023.

²⁹⁶ Interview with housing policy analyst, December 2023; Interview with Crosscare, December 2023; Interview with the IRC, December 2023; Interview with Nasc, November 2023.

²⁹⁷ Interview with IPAS, January 2024 interview; Interview with Crosscare, December 2023; Interview with AkiDwA, December 2023; Interview with the IRC, December 2023.

²⁹⁸ Crosscare Refugee Service (2018). Submission to the Minister for Justice and Equality; Interview with AkiDwA, December 2023.

departments/agencies, such as travel and overnight accommodation for healthcare and Department of Justice appointments.²⁹⁹

Limited social networks in the country also means that international protection beneficiaries have less access to housing information (Finn and Mayock, 2021).³⁰⁰ A lack of access to IT (computers, internet) and the relevant skills also make it difficult for beneficiaries to find housing, which are often advertised through online databases, which, according to Doras, are not optimised for translation.³⁰¹

4.2.1.3 Psychological issues

Both delays in the international protection process and difficulties accessing autonomous housing have resulted in international protection beneficiaries remaining in IPAS centres for years at a time.³⁰² Previous research in Ireland has found that refugees have a high prevalence of psychological issues due to traumatic experiences and post-migration stressors such as insecure residency (O’Connell et al., 2016). In addition, living in the Direct Provision system has been found to have negative psychological impacts, reducing personal autonomy and self-esteem (Crosscare Refugee Service, 2018; College of Psychiatrists of Ireland, 2017; Foreman and Ní Raghallaigh, 2015; Stewart, 2006), and increasing dependency (Ní Raghallaigh et al., 2016), which can then pose a further challenge for those trying to find autonomous housing. Interviews with IPAS and AkiDwA echoed these findings.³⁰³

4.2.1.4 Employment

Previous research on the housing experiences of migrants in rural Ireland has found that employment influences a migrant’s access to housing and shapes their subsequent housing trajectories (Finn and Mayock, 2021). However, it should be noted that a person’s employment opportunities and their ability to engage in the labour market can also be adversely affected by the international protection system in Ireland (McGinnity et al., 2020; O’Connell, 2019) (see Section 4.2.2.8). Doras (2021), for instance, has stressed that while there have been improvements in access to the labour market in Ireland since the EU (recast) Directive was adopted, barriers to participation in employment remain, including the isolation of reception centres (see Section 4.2.2.8), frequent transfers between centres regardless of employment status (see Section 4.2.2.6), and the short-term nature of work permits. A lack of access to employment (which can be exacerbated by a lack of transport options when centres are in rural areas) can hinder access to autonomous housing as it means that people don’t have employment references, have fewer informal connections, and don’t have sufficient income for rent or

²⁹⁹ Correspondence with DSP, April 2024.

³⁰⁰ Interview with AkiDwA, December 2023; Interview with Housing Agency representative, January 2024.

³⁰¹ Interview with Crosscare, December 2023; Correspondence with Doras, September 2023.

³⁰² See Murphy, and Sheridan (2022, p. 52) for statistics.

³⁰³ Interview with IPAS, January 2024; Interview with AkiDwA, December 2023.

deposits or additional income to top-up HAP payments (Bieri, 2024; Polakowski and Cunniffe, 2023; Doras, 2021; McGinnity et al., 2020; Duffy and Crumlish, 2016).

4.2.2 Systemic barriers

While pre-existing characteristics of BIPs create some barriers for accessing autonomous housing, most of the barriers that emerged related to the mainstream housing market, system for housing and integration of BIPs, and supports.

4.2.2.1 Housing market

The overriding challenge and primary barrier for BIPs accessing autonomous housing in Ireland to emerge from this research is the prevailing housing crisis in Ireland. There continues to be a severe lack of available and affordable housing, in particular in the private rental sector in areas with employment opportunities or diaspora networks (see Section 1.2.2).³⁰⁴ Almost all interviewees identified the lack of supply as the principal barrier for people accessing housing,³⁰⁵ with Crosscare stressing that even if all other barriers were removed, until the supply issue is solved, the problem would remain.³⁰⁶ In a similar vein, the IRC described the private rental market as ‘currently defunct’ for this population.³⁰⁷

*It’s a contest for very scarce resources, as a result of the austerity wash-through. There are capacity issues and in that context those with the least capacity to resolve their problems are most affected.*³⁰⁸

Five NGOs and the housing policy analyst indicated that the problem had significantly worsened in recent years, in particular since 2019/2020, stressing that there is almost no housing available for those trying to transition into autonomous housing.³⁰⁹ This finding is supported by data on those with status in IPAS accommodation (see Figure 4.1, Section 4.1.1) and Daft.ie rental data (See Section 1.2.2). The issue is especially important in a context where HAP is the most common form of social housing support, as it requires recipients to source their own accommodation in the private rental market, within specific limits (see Section 4.2.2.2 below on availability of properties within these limits).

³⁰⁴ Correspondence with JRS Ireland, September 2023. Interview with the IRC, December 2023; Interview with LGMA representatives, September 2023; Interview with housing policy researcher A, December 2023; Interview with Crosscare, December 2023; Interview with Nasc, November 2023; Interview with housing policy analyst, December 2023; Correspondence with local authority 2.

³⁰⁵ Interview with IPAS, January 2024; Interview with housing policy analyst, December 2023; Interview with housing policy researcher A, December 2023; Interview with the IRC, December 2023; Interview with LGMA representatives, September 2023; Interview with Crosscare, December 2023; Interview with Nasc, November 2023; Interview with Housing Agency representative, January 2024; Interview with local authority representative 1, December 2023; Interview with AkiDwA, December 2023.

³⁰⁶ Interview with Crosscare, December 2023.

³⁰⁷ Correspondence with the IRC, September 2023.

³⁰⁸ Interview with housing policy analyst, December 2023.

³⁰⁹ Interview with the IRC, December 2023; Interview with Crosscare, December 2023; Interview with housing policy analyst, December 2023; Correspondence with JRS Ireland, February 2024; Correspondence with AkiDwA, March 2024; Correspondence with Nasc, March 2024.

Crosscare, the housing policy analyst and a housing policy researcher all suggested that the lack of available and affordable housing created a highly competitive market for any available housing, which left those with any prior disadvantages or facing additional barriers in a particularly precarious position.³¹⁰ This highly competitive market for rental accommodation greatly compounds those barriers already faced by BIPs – for example irregular or unusual documentation, which inconveniences landlords at a time when they have many options for tenants – and discrimination. Crosscare, for instance, suggested that those who face a language barrier may face increased challenges in accessing housing due to the need to respond extremely quickly to advertised housing resulting from the competitiveness of the market.³¹¹

Several NGO actors noted trends such as increased international protection applications and the failure to meet social housing targets,³¹² which may exacerbate this problem. The UNHCR Ireland representative similarly shared a marked concern for the future, highlighting that higher than anticipated inward migration in 2022 signifies that housing need and demand assessments would have been based on lower immigration assumptions.^{313,314} This is corroborated by recent research from the ESRI, indicating that population growth has been higher than expected (Barrett and Curtis, 2024).

The housing policy analyst consulted highlighted the challenge of short-term lets for the tourism sector, which may disproportionately affect areas in which tourism is prevalent, which, as discussed in Section 1.1.1, may also house a lot of IPAs/BIPs because of the procurement system and significant reliance on hotels and guesthouses.³¹⁵ While there is a dearth of research so far on the short-term rental sector and its overall impact, there is a potential overlap between areas with tourist accommodation being used to house IPAs/BIPs and areas that are attractive to short-term lets. This may have an impact on the availability of rental properties.³¹⁶

4.2.2.2 Adequacy of support services

Many stakeholders identified inadequate support services as a major challenge for BIPs. Stakeholders referenced both mainstream supports (see Section 2.1) and

³¹⁰ Interview with Crosscare, December 2023; Interview with housing policy analyst, December 2023; Interview with housing policy researcher A, December 2023.

³¹¹ Interview with Crosscare, December 2023.

³¹² Correspondence with JRS Ireland, September 2023.

³¹³ The assumptions for net international migration were of +30,000 in 2020 and estimations of remaining constant thereafter (Bergin and Garcia-Rodriguez, 2020, p. 18). However, apart from 2021, the flows were significantly higher, at 77,600 to April 2023, and 51,700 to April 2022 (see CSO, 2023a). More information on migration statistics for Ireland are available at: <https://emn.ie/2023-population-and-migration-figures/>.

³¹⁴ Correspondence with a representative from UNHCR Ireland, August 2023.

³¹⁵ Correspondence with housing policy analyst, February 2024.

³¹⁶ Correspondence with housing policy analyst, February 2024.

targeted supports (see Section 2.2) as currently insufficient to meet the needs of BIPs.³¹⁷

Identified issues with mainstream supports include concerns around the adequacy of HAP in the current context of the housing market (see Sections 1.1.3 and 4.2.2.1).³¹⁸ Firstly, the availability of HAP-eligible properties appears to be a significant issue. In a highly constrained rental sector that offers few units to rent and rapidly increasing prices, finding properties within HAP rental limits appears to be a significant challenge. Doolan et al (2022) found that by 2020 less than 7% of one-bedroom rental tenancies registered in the Dublin City Council region fell below the maximum amount allowed for a non-homeless single applicant to HAP, with low levels of availability also emerging in more rural rental markets such as Kerry and Carlow. Simon Communities of Ireland (2024) found that in December 2023 just 33 properties were available to rent within standard or discretionary HAP limits across the 16 urban centres, suburbs and certain rural areas analysed.³¹⁹ The report found that 76% of these were in Dublin, and that in 9 of the 16 areas looked at, there were no properties available within the standard or discretionary HAP limit (Simon Communities of Ireland, 2024). Only 2 properties, both located in Cork city, were identified as falling within standard HAP limits across the 16 study areas. IPAS also identified the lack of available properties within HAP limits as one of the biggest barriers for BIPs.³²⁰

While BIPs have access to Homeless HAP, which covers their deposit and rent in advance, the IRC reported that, as of March 2024, there were delays of around six weeks in this payment being processed.³²¹ As a result, people can be obliged to cover the deposit and first month(s)'s rent themselves so as to secure the accommodation (they are later refunded).³²² In addition, an IRC representative noted that when people do pay their rent or deposit while their HAP is being processed, local authorities may refuse to pay; in other cases, landlords won't wait for HAP to be processed and people lose the property.³²³ In addition, according to a representative from Mercy Law Resource Centre, in many local authority areas the HAP Place Finder Service is extremely limited.³²⁴

³¹⁷ Interview with Crosscare, December 2023; Interview with the IRC, December 2023; Interview with Nasc, November 2023; Interview with AkiDWA, December 2023; Interview with housing policy analyst, December 2023; Interview with IPAS, January 2024; Interview with Housing Agency representative, January 2024.

³¹⁸ Interview with IPAS, January 2024; Correspondence with JRS Ireland, September 2023.

³¹⁹ The report is based on data from Cork city centre, Cork city suburbs, Dublin city centre, Dublin city north, Dublin city south, Galway city centre, Galway city suburbs, Limerick city centre, Limerick city suburbs, Portlaoise, Kildare (selected areas), Athlone, Sligo Town, Dundalk, Co. Leitrim and Waterford city centre.

³²⁰ Interview with IPAS, January 2024.

³²¹ Correspondence with the IRC, March 2024. DHLGH indicated that this may not be the experience of all households, as local authorities prioritise making these initial payments to landlords ASAP; Correspondence with DHLGH, April 2024.

³²² Correspondence with the IRC, March 2024; Interview with the Peter McVerry Trust, March 2024.

³²³ Correspondence with the IRC, March 2024.

³²⁴ Correspondence with Mercy Law Resource Centre, March 2024.

Many people have to make top-up payments to HAP. JRS Ireland and the IRC highlighted that the mainstream HAP and Homeless HAP (see Section 2.1.11 for details) are often lower than market rents, which means those transitioning from IPAS accommodation have to fund the shortfall (see also Hearne and Murphy, 2017).³²⁵ This was corroborated by the most recent RTB survey, which indicated that 88% of all tenants surveyed in receipt of rental assistance made a top-up payment to their landlords, a rate that was higher for non-Irish nationals (92%).³²⁶ In addition, stakeholders cited the lack of translation services in frontline supports,³²⁷ and issues in relation to clarity around and sensitivity to BIPs' situation (see Section 3.1.2).

The adequacy of resources allocated to targeted supports for BIPs was also questioned throughout the research, in particular in the current housing context. As mentioned previously (see Section 2.2.2), there are approximately 185 BIPs (representing 112 households) in IPAS accommodation for each caseworker hired, which several NGOs considered insufficient in light of the intensity of the support required and the challenges posed by the current housing market.³²⁸

4.2.2.3 Administrative barriers

While BIPs have the same entitlements to social housing as Irish citizens (see Section 1.1.4), significant issues were found in relation to their access to social housing.

Firstly, a lack of clarity among frontline workers in local authorities of the rights, entitlements and exemptions of BIPs was reported.³²⁹ The IRC and Crosscare suggested that such gaps in knowledge have led to requests for documents that BIPs are exempt from having to provide, and local authority housing officers asking unnecessary, extensive questions about people's immigration background. The latter is in spite of the individuals concerned possessing documentation that entitles them to social housing on the same basis as Irish citizens.³³⁰ Staff turnover was identified as an issue linked with this (see Section 3.1.2), as was the way in which the 'recognition letters' changed without frontline workers being updated accordingly (see Section 3.1.4).

Significant delays with the processing of applications were also reported as a challenge, with Nasc, Crosscare and the IRC experiencing delays beyond the 12-

³²⁵ Correspondence with JRS Ireland; Correspondence with the IRC, March 2024. David Carroll cited in K. Holland (2022) 'Almost 4,000 people trapped in direct provision due to housing crisis', *Irish Times*, 15 July.

³²⁶ RTB Tenants Survey (RTB, 2023b).

³²⁷ Interview with Housing Agency representative, January 2024.

³²⁸ Interview with the IRC, December 2023; Interview with Nasc, November 2023; Interview with Crosscare, December 2023.

³²⁹ Interview with the Peter McVerry Trust, March 2024; Interview with AkiDWA, December 2023; Interview with the IRC, December 2023; Interview with Crosscare, December 2023.

³³⁰ Interview with Crosscare, December 2023; Interview with the IRC, December 2023.

week statutory requirement for assessing applications.³³¹ While the Department of Housing, Local Government and Heritage (DHLGH) indicated that delays can arise because of the need for documentation,³³² NGOs had experienced situations where BIPs were asked for the same documentation multiple times, were asked for documentation from which they were exempt from providing,³³³ and experienced delays beyond the statutory period without additional documentation requests.³³⁴

The application of the local connection test (see Sections 2.1.1.1 and 2.1.3) was found to be a barrier to BIPs accessing supports.³³⁵ The application of the test was also identified by several interviewees as a significant barrier to BIPs being assessed as eligible for social housing in places they want to live, as many BIPs try to move to cities where they have contacts or where there are more employment opportunities.³³⁶ Although the local connection test is applied at the discretion of local authorities, with those applying it appearing to do so sporadically,³³⁷ the test may result in the ineligibility of some BIPs for social housing assistance in the area in which they reside or wish to reside. Therefore, they may be delayed in or prevented from accessing social housing lists, supports and/or tenancies, especially when lacking familiarity with the system and available resources, such as inter-county HAP.³³⁸ The housing policy analyst interviewed indicated that, to reduce the demand for social housing, local authorities whose housing systems are under pressure are more likely to apply the local connection test.³³⁹ This barrier is therefore linked to other factors relating to pressure on the system, such as those described in Section 4.2.2.4 below. The application of the local connection test to those trying to access emergency homeless accommodation was also identified as a barrier (see Section 4.2.2.10).

4.2.2.4 Overburdened services

The challenges with the housing market (described in Sections 1.1.3 and 3.1.1) have put significant pressure on many government services, such as social housing, frontline support workers and homelessness services.³⁴⁰ The resulting high level of

³³¹ Interview with the IRC, December 2023; Interview with Crosscare, December 2023; Correspondence with Nasc, March 2024.

³³² Correspondence with DHLGH, March 2024.

³³³ Interview with the IRC, December 2023; Interview with Crosscare, December 2023; Correspondence with Nasc, March 2024; Correspondence with Mercy Law Resource Centre, April 2024.

³³⁴ Correspondence with Mercy Law Resource Centre, April 2024.

³³⁵ Interview with Nasc, November 2023; Correspondence with Mercy Law Resource Centre, April 2024.

³³⁶ Interview with LGMA representatives, September 2023; Interview with housing policy analyst, December 2023; Interview with housing policy researcher A, December 2023; Interview with the IRC, December 2023; Interview with Crosscare, December 2023; Interview with local authority representative 1, December 2023.

³³⁷ Interview with local authority representative 1, December 2023; Interview with housing policy researcher A, December 2023; Interview with housing policy analyst, December 2023; Interview with Crosscare, December 2023.

³³⁸ Correspondence with DCEDIY.

³³⁹ Interview with housing policy analyst, December 2023.

³⁴⁰ Interview with housing policy analyst, December 2023.

competition for these public services has placed BIPs at a disadvantage.³⁴¹ According to the housing policy analyst, strain on services puts those with any additional barriers or disadvantages at serious risk of being overlooked by these public services, as their cases are more labour intensive, there is a lack of clarity about their rights and entitlements, or there are additional issues such as language barriers. According to the housing policy analyst, this would not pose a problem if sufficient resources were allocated to these services, but in the current context it leads to the deprioritisation of difficult cases:

*If 50 people come through the door, the people with the golden ticket will get the service first – the people at the back of the queue will be those with poor language skills, no orientation in the services, and poor/irregular documentation – they’re then in a very difficult position because their case is labour intensive. But if you had enough people on the frontline, you can get that done.*³⁴²

4.2.2.5 Family reunification

Family members of BIPs arriving in Ireland through the family reunification process are outside the scope of this report. Moreover, fewer people are arriving through family reunification than through international protection; 760 applications in relation to 2,245 individuals were received in 2022 for example (not all of which may be granted).³⁴³ Nonetheless, it is relevant to note that Nasc, the IRC, Mercy Law Resource Centre, and Crosscare shared their concern over how this can further complicate BIPs’ efforts to access housing, and how the difficulties experienced by BIPs in accessing housing consequently affect this group as well.³⁴⁴ As the IRC stated, ‘families are inevitably arriving into homelessness’.³⁴⁵ This supports Smith et al.’s (2020) research on family reunification in Ireland, which found that, for a number of reasons, challenges with family reunification can also lead to BIPs who have accessed autonomous housing falling into homelessness.³⁴⁶ There are a number of factors behind this.

Firstly, the inability of those arriving through family reunification to apply for personal public service number (PPSN) appointments prior to their arrival in the country leads to delays in their being placed on social housing lists and accessing social welfare.³⁴⁷ As a result, as BIPs in Ireland are each only eligible for social housing supports for an individual person, they cannot access social housing for their entire family (even if the family’s arrival is imminent). Therefore, even in a

³⁴¹ Interview with housing policy analyst, December 2023; Interview with housing policy researcher A, December 2023; Interview with Housing Agency representative, January 2024; Interview with Crosscare, December 2023.

³⁴² Interview with housing policy analyst, December 2023.

³⁴³ Department of Justice (2023). ‘Response to parliamentary question 15502/23’, www.oireachtas.ie.

³⁴⁴ Interview with Crosscare, December 2023; Interview with Nasc, November 2023; Interview with the IRC, December 2023; Correspondence with Mercy Law Resource Centre, April 2024.

³⁴⁵ Interview with the IRC, December 2023.

³⁴⁶ Interview with Crosscare, December 2023; Interview with Nasc, November 2023; Interview with the IRC, December 2023.

³⁴⁷ Necessary for accessing a range of government services, including social welfare and social housing lists.

situation where a BIP has accessed autonomous housing for themselves prior to the arrival of their family, their HAP entitlements, which account only for the single individual (at most covering a studio or one-bed apartment, or a room in a shared house or apartment), will be inadequate for family-sized accommodation. Crosscare stressed that once the family of a BIP arrives, they can also then face problems of inadequate housing, such as overcrowding, which can lead them to fall into homelessness.³⁴⁸

Crosscare, the IRC and Nasc indicated that some local authorities can be reluctant to provide people arriving here through family reunification with emergency homeless accommodation, because they are not on a social housing waiting list.³⁴⁹ Crosscare, for example, described encountering families who were only provided with emergency homeless accommodation after having presented to a garda station multiple nights in a row.³⁵⁰ However, Nasc indicated that with advocacy families can generally access local authority emergency accommodation.³⁵¹

There are also major implications for newly arrived families who struggle to access homeless accommodation.³⁵² The IRC and Crosscare reported that often families are split up across diaspora networks, noting subsequent child protection concerns as well as the strain that this can put on families.³⁵³

4.2.2.6 Transfer of BIPs to emergency accommodation

It has recently become IPAS policy to transfer those who have had their status for at least 12 months into emergency accommodation (see Section 1.1.1), often in areas far from where they had been residing. As of 22 February 2024, 1,256 households had been advised of a transfer to alternative emergency accommodation. Of these, 745 left IPAS accommodation, 96 availed of the offer of emergency accommodation and 415 households were still in the process.³⁵⁴

Nasc, the IRC and the housing policy analyst noted that this presents a challenge to BIPs trying to access autonomous housing. They stressed that this policy has resulted in BIPs often being transferred away from NGOs that they had been engaging with. It can also separate them from employment, services and education, as well as pre-established social networks and contacts that could support them in their search for autonomous housing. The IRC noted that some

³⁴⁸ Interview with Crosscare, December 2023.

³⁴⁹ Interview with Crosscare, December 2023; Interview with Nasc, November 2023; Interview with the IRC, December 2023.

³⁵⁰ Interview with Crosscare, December 2023.

³⁵¹ Correspondence with Nasc, March 2024.

³⁵² Interview with the IRC, December 2023; Interview with Crosscare, December 2023; Interview with Nasc, November 2023.

³⁵³ Interview with Crosscare, December 2023; Interview with the IRC, December 2023.

³⁵⁴ It should be noted that those over the age of 65 or with significant medical or welfare needs are not transferred; DCEDIY (2024). 'Response to parliamentary question 8618/24', www.oireachtas.ie.

BIPs were subject to multiple transfers.³⁵⁵ The housing policy analyst consulted indicated that this had been flagged by stakeholders as creating poor outcomes, in that it undermines the multi-agency case management approach, especially for BIPs who had successfully established access to local healthcare, training or education, or had found employment or were volunteering, or had children enrolled in school.³⁵⁶ Similarly, a local authority representative flagged transfers of BOPs as a significant challenge for service providers and local stakeholders trying to ensure access to services for BOPs, as sometimes they had accessed schools and other services and were then transferred, resulting in them having to begin the process again elsewhere.³⁵⁷

Nasc reported that BIPs with connections or employment in their local area sometimes didn't want to leave, to the extent that they would try to move into emergency homeless accommodation provided by local authorities in order not to have to leave the area.³⁵⁸ (Section 3.1.3 provides further details of the challenges related to refusal of a transfer and accessing emergency accommodation as a result.) Nasc also indicated that no information is provided to BIPs subject to transfers regarding how the transfer may impact their social housing application, and what they need to do. They indicated that BIPs likely need to notify the local authority of their move; otherwise, there is a risk of them being removed from the housing list if they miss correspondence as a result of not notifying the local authority.³⁵⁹

Despite the several challenges raised in regards to BIP transfers, a representative from the Peter McVerry Trust reported that receipt of a transfer letter can increase the sense of urgency for the person concerned, which can subsequently lead to their increased engagement with the organisation's transition services.³⁶⁰ The representative noted that BIPs typically come to them after receiving a transfer letter to ask them to advocate against the transfer, but that this initial contact enables Peter McVerry Trust to support them with their progression out of IPAS.³⁶¹

4.2.2.7 Digitalisation

The digitalisation of services often aims at improving accessibility, efficiency and inclusivity. However, the IRC and Crosscare identified that for some BIPs with language or literacy issues and with low technological literacy, it can act as a barrier.³⁶² The NGOs suggested that in-person appointments and frequent contact with service users could make public services and eligibility much simpler and more

³⁵⁵ Correspondence with the IRC, March 2024.

³⁵⁶ Correspondence with housing policy analyst, February 2024.

³⁵⁷ Interview with local authority representative 2, December 2023.

³⁵⁸ Interview with Nasc, November 2023.

³⁵⁹ Correspondence with Nasc, March 2024.

³⁶⁰ Interview with the Peter McVerry Trust, March 2024.

³⁶¹ Interview with the Peter McVerry Trust, March 2024.

³⁶² Interview with Crosscare, December 2023; Interview with the IRC, December 2023.

accessible to BIPs, but that not all local authorities who had digitised their services still offered in-person appointments. The Peter McVerry Trust representative agreed that in their experience in-person services are much better, particularly as it can help overcome certain language barriers. They added that all transition services provided by the organisation to BIPs are in-person, supplemented by other forms of communication such as WhatsApp and email.³⁶³

4.2.2.8 The dispersal system

Several barriers related to Irish dispersal policies (see Section 1.1.1), were identified as also posing challenges to accessing autonomous housing.

Firstly, a lack of long-term strategic planning involved in the current ad hoc dispersal system of reception in Ireland (see Section 1.1.1) was identified by several actors as a barrier to access. This is because there is no consideration of available housing or services in the local area when centres are chosen, and IPAs are not included in housing targets, even though many are likely to get status (see Section 2.3.3).³⁶⁴ This has been exacerbated by the significant increase in the number of individuals being accommodated by DCEDIY, which has put IPAS under considerable strain (see Section 1.1.2). As a result, reception centres may be opened in areas where there are few appropriate houses, services or opportunities for BIPs once they get their status.³⁶⁵

In addition, several actors reported that there is limited planning or consideration of employment opportunities and the long-term future of BIPs, either during the initial dispersal or during IPAS transfers for BIPs who have been in centres long-term.³⁶⁶ (See Section 4.2.1.4 on the associated employment challenges.)

While there are usually some supports available locally,³⁶⁷ if a reception centre is in an isolated area, access issues can lead to BIPs being prevented from access to support services in addition to those commissioned by DCEDIY; the larger relevant NGOs, for example, which have greater expertise and capacity regarding the needs of BIPs, tend to be based in urban areas.³⁶⁸ This may lead to large discrepancies in

³⁶³ Interview with the Peter McVerry Trust, March 2024.

³⁶⁴ Interview with IPAS, January 2024; Interview with housing policy researcher A, December 2023; Interview with local authority representative 1, December 2023; Interview with local authority representative 2, December 2023; Interview with housing policy analyst, December 2023; Interview with the IRC, December 2023.

³⁶⁵ Interview with AkiDwA, December 2023; Interview with local authority representative 2, December 2023; Correspondence with DHLGH, March 2024; Correspondence with the IRC, March 2024.

³⁶⁶ Interview with IPAS, January 2024; Interview with Nasc, November 2023; Interview with local authority representative 1, December 2023; Interview with housing policy analyst, December 2023.

³⁶⁷ Correspondence with UNHCR Ireland representative, March 2024.

³⁶⁸ Interview with Crosscare, December 2023; Interview with local authority representative 2, December 2023; Correspondence with JRS Ireland, February 2024; interview with AkiDwA, December 2023; Correspondence with UNHCR Ireland representative, March 2024; Correspondence with Nasc, March 2024.

outcomes, as multiple interviewees highlighted the importance of an advocate and caseworker in achieving access to autonomous housing.³⁶⁹

A reception centre being in an isolated setting can also prevent BIPs from forming social connections in their local community. This issue was identified by AkiDwA and the Housing Agency, as well as previous research (Finn, 2015, and Bieri, 2024, for instance). Such connections can facilitate access to housing in a difficult market.³⁷⁰ An IRC representative noted that for some BIPs, living in remote accommodation with irregular public transport options can also negatively impact their mental health.³⁷¹

In light of these challenges, the importance of a more strategic, long-term approach to integration and access to autonomous housing was stressed by several stakeholders.³⁷²

4.2.2.9 Length of the protection process

The international protection procedure in Ireland has frequently been criticised for its significant processing delays; it had a median processing time of 18 months in 2022 and 13 months in 2023.³⁷³ The length of the protection process can become a barrier to accessing autonomous housing for BIPs. This is in part because of its psychological impacts (see Section 4.2.1.3) but also because it means that BIPs become integrated and build a community within the centre and within their local area.³⁷⁴ If BIPs become integrated in a community over time, they may not want to leave it. They may therefore feel reluctant to move out of their IPAS accommodation if a low local housing availability means that doing so would require them to move out of that local area altogether.³⁷⁵ Furthermore, the duration spent in IPAS accommodation can lead to dependency and institutionalisation, which can form yet another challenge for BIPs trying to access and live independently in autonomous housing.³⁷⁶

³⁶⁹ Interview with Crosscare, December 2023; Interview with Housing Agency representative, January 2024; Interview with the IRC, December 2023; Interview with AkiDwA, December 2023.

³⁷⁰ Interview with AkiDwA, December 2023; Interview with Housing Agency representative, January 2024.

³⁷¹ Correspondence with the IRC, March 2024.

³⁷² Interview with IPAS, January 2024; Interview with Housing Agency representative, January 2024; Interview with local authority representative 1, December 2023; Interview with LGMA representatives, September 2023.

³⁷³ Department of Justice (2024). 'Response to parliamentary questions 5458/24 and 5459/24', www.oireachtas.ie.

³⁷⁴ Interview with AkiDwA, December 2023; Interview with IPAS, January 2024.

³⁷⁵ Interview with IPAS, January 2024; Interview with AkiDwA, December 2023; Interview with Nasc, November 2023.

³⁷⁶ Interview with AkiDwA, December 2023.

4.2.2.10 Access to emergency homeless accommodation

Emergency homeless accommodation emerged as relevant to BIPs due to the severity of the housing crisis in Ireland, a consequence of which is that some BIPs or their families need to rely on emergency homeless accommodation.³⁷⁷

There is an IPAS policy to not force people out of IPAS into emergency homeless accommodation. Nonetheless, the IPAS transfer policy has led to situations where people leave IPAS accommodation and try to access emergency homelessness accommodation through the local authority in the area they have been living. This is because leaving the local area may mean having to leave their job, if they're working, their education, or their local community, for example.³⁷⁸ In doing so, however, they might then face barriers to accessing emergency homeless accommodation if the local authority is of the opinion that they already have an accommodation offer from IPAS (see Section 3.1.4).³⁷⁹

Reunified family members can face extended periods waiting for the necessary paperwork, before being added to a social housing waiting list. This can result in some local authorities being unwilling to grant them access to emergency homeless accommodation.³⁸⁰ NGOs indicated that BIPs and their reunified families often can eventually access local authority emergency accommodation; however, doing so can necessitate advocacy and support in navigating processes, something that not all BIPs and reunified families may have access to.³⁸¹

Mercy Law Resource Centre noted significant variability in local authority decision making on this issue, as well as a lack of documentation in some cases. They reported that some of their clients have experienced difficulties accessing homeless assessments, and yet are not provided an explanation in writing for a refusal to assess them as homeless, or to provide supports in cases where they have been recognised as homeless. They suggested that there was also a lack of structured appeal mechanisms to challenge decisions by local authorities in relation to access to emergency homeless accommodation.³⁸²

³⁷⁷ Interview with Crosscare, December 2023; Interview with the IRC, December 2023; Interview with Nasc, November 2023.

³⁷⁸ Interview with Nasc, November 2023; Interview with the IRC, December 2023.

³⁷⁹ Interview with LGMA representatives, September 2023; Interview with Crosscare, December 2023; Interview with the IRC, December 2023; Interview with Nasc, November 2023; Correspondence with Mercy Law Resource Centre, April 2024.

³⁸⁰ Interview with Nasc, November 2023.

³⁸¹ Correspondence with Nasc, March 2024; Correspondence with Mercy Law Resource Centre, April 2024; Interview with Crosscare, December 2023.

³⁸² Correspondence with Mercy Law Resource Centre, April 2024.

4.3 RESPONDING TO CHALLENGES AND GOOD PRACTICES

Stakeholders proposed multiple responses to the challenges described in the previous section (4.2), with a number of good practices identified.

4.3.1 Provision of supports

In-depth casework and advocacy support services were identified by the Housing Agency and several NGOs as the most effective method for supporting people to transition to autonomous housing.³⁸³ These stakeholders suggested that a number of support services were effective: direct engagement with individuals to assist in navigating social housing applications; continuous support with document requests; advocacy, involving liaison with local authorities and IPAS for the acknowledgment of rights and document acquisition; comprehensive assistance in housing searches; and ensuring that rights are respected once people have accessed housing.³⁸⁴ These types of support services were found to assist BIPs to access their entitlements, such as HAP, and emergency homeless accommodation if necessary. One example of such good practice identified is the IRC's group workshops and information sessions. These enable them to meet high demand and support a larger number of people at a time than is the case with one-on-one sessions, which they had previously been providing.³⁸⁵

The wraparound services and support approach taken for resettled refugees, which includes a resettlement caseworker, was identified by several stakeholders as a good practice (see Box 4.1 below).³⁸⁶ One local authority representative described the importance of continued support and wraparound supports:

*Housing is only one part. ... The solution is not just finding a property. Leaving people in that situation is just creating problems for the future. Providing wraparound supports and services does work.*³⁸⁷

³⁸³ Interview with Housing Agency representative, January 2024; Interview with Crosscare, December 2023; Interview with Nasc, November 2023; Interview with the IRC, December 2023.

³⁸⁴ Interview with Crosscare, December 2023; Interview with Housing Agency representative, January 2024; Interview with the IRC, December 2023; Interview with Nasc, November 2023; Interview with AkiDWA, December 2023; Interview with IPAS, January 2024.

³⁸⁵ Interview with the IRC, December 2023.

³⁸⁶ Interview with local authority representative 1, December 2023; Interview with Housing Agency representative, January 2024; Interview with the IRC, December 2023; Interview with IPAS, January 2024; Correspondence with AkiDWA, March 2024; Correspondence with UNHCR Ireland representative, March 2023.

³⁸⁷ Interview with local authority representative 1, December 2023.

BOX 4.1 CASE STUDY OF SUPPORTS FOR RESETTLED REFUGEES

While ‘spontaneous’ refugees receive mainstream integration supports, resettled refugees receive targeted supports (Arnold et al., 2021; Gusciute et al., 2016).^{388,389} A number of interviewees, including a local authority representative, described the provision of these targeted supports as a good practice:

Resettled refugee supports were a best practice. We shouldn't be trying to reinvent the wheel, we can use that model. (Local authority representative 1)

Targeted supports that were provided for resettled refugees include:

- Initial housing in an Emergency Reception and Orientation Centre, after which local authorities source their housing, often in the private rental market or through housing associations;
- Support from a resettlement team to a local interagency working group for 18 months after the resettlement of the refugee into the receiving community;
- Grants to the receiving community for the establishment of homework clubs, links with sporting clubs;
- Employment of a resettlement worker to support the refugees during their first year in the community by facilitating access to local services and assisting with problems that arise;
- Accompaniment to initial appointments with public services;
- Provision of interpretation services for appointments;
- An initial eight to ten week, reception-centre-based orientation programme that covers topics such as rights and entitlements, life in Ireland, child protection, children's rights, domestic violence, the role of An Garda Síochána (the Irish police force), the position of women, the Irish education system, employment etc. (Gusciute et al., 2016).

The UNHCR Ireland representative identified the establishment of LAITs, as well as certain other elements of the white paper that similarly seek to draw from good practices in providing supports to resettled refugees, as a positive development in this regard.³⁹⁰ They added that the same level of support wouldn't necessarily be needed for asylum seekers/BIPs as for resettled refugees, as resettled refugees

³⁸⁸ ‘Spontaneous’ refugees refers to those who arrive independently and go through the international protection process in Ireland.

³⁸⁹ Resettled refugees are those who come through the Irish Refugee Protection Programme and are therefore brought into Ireland having already been identified as refugees.

³⁹⁰ Correspondence with UNHCR Ireland representative, March 2024.

coming to Ireland are usually prioritised for resettlement on the basis of vulnerability and will have been living in difficult conditions in a third country of asylum for a protracted time. However, the representative further noted that resettled refugees typically come in groups, often with a shared nationality, language, etc., which, in some ways, can make the provision of targeted supports easier to facilitate.³⁹¹ One stakeholder suggested that not all people may need wraparound supports; therefore, programmes such as support for living independently could provide a useful model to draw from.³⁹²

Despite the benefits of providing these various supports, several NGOs emphasised that such widespread, well-resourced casework is presently lacking.³⁹³ While DCEDIY has commissioned NGOs to provide similar work, their caseload appears to be such that it is difficult to provide the required level of support needed to enable BIPs to access the current private rental market. AkiDwA and a local authority representative also stressed the need to continue to support people after they have accessed autonomous housing to help them with the transition to autonomous housing, and to understand utilities, etc.³⁹⁴

Despite the value placed on such support services, it is important to note that most stakeholders who discussed their benefits explained that, even with the provision of extensive and well-resourced support, the current housing crisis would impede BIPs' access to autonomous housing.³⁹⁵

4.3.2 Access to services and social welfare

Crosscare identified giving people the option of an in-person appointment to submit their social housing application, rather than requiring them to do it online, as a good practice.³⁹⁶ They indicated that online applications were often quite difficult for BIPs who sometimes had language, computer literacy, or basic literacy problems, and that in-person appointments could help them to overcome some of these barriers. Crosscare and Nasc both experienced an absence of standard practice across local authorities, with, for example, Dublin City Council facilitating in-person appointments, while other local authorities in Dublin only accept online ones.³⁹⁷

³⁹¹ Correspondence with UNHCR Ireland representative, March 2024.

³⁹² Interview with the Peter McVerry Trust, March 2024.

³⁹³ Interview with Crosscare, December 2023; Interview with the IRC, December 2023; Interview with Nasc, November 2023.

³⁹⁴ Interview with Interview with AkiDwA, December 2023; Interview with local authority representative 1, December 2023.

³⁹⁵ Interview with Crosscare, December 2023; Interview with the IRC, December 2023; Interview with Nasc, November 2023; Interview with IPAS, January 2024; Interview with Housing Agency representative, January 2024; Interview with housing policy analyst, December 2023; Interview with housing policy researcher A, December 2023.

³⁹⁶ Interview with Crosscare, December 2023.

³⁹⁷ Interview with Crosscare, December 2023; Correspondence with Nasc, March 2024.

Currently, PPSN appointments can only be made once people have arrived into Ireland, and even then they often face a waiting period of several weeks.³⁹⁸ It should be noted, however, that certain NGOs, such as the IRC, use contacts to assist with the processing of PPSNs for reunified families, which results in shorter waiting periods.³⁹⁹ According to NGOs, it used to be possible to arrange PPSN appointments for those arriving through family reunification before they arrived in the State,⁴⁰⁰ so that the actual appointment could be scheduled for the day they arrived in the country. This was found to significantly reduce the administrative delays in accessing a variety of services and social welfare benefits. While not resolving the issue fully, this appointment on arrival was considered a good practice by a number of NGOs as it reduced delays (see Section 4.2.2.5).⁴⁰¹

DSP indicated that the existing national phonenumber for community welfare services represents good practice. They also expressed that the following would make for good practices that would result in improved access: allowing people to access the Community Welfare Service without making an appointment; and allowing people to make a claim without meeting with a Community Welfare Officer.⁴⁰²

4.3.3 Building social capital and resilience

The Housing Agency representative stressed the importance of building resilience and social capital from early on in the process. This is achieved by linking people with education, employment opportunities and financial supports before housing.⁴⁰³ Secondly, echoing some of the Irish research outlined in Section 1.2 (Bieri, 2024; Finn and Mayock, 2021), they highlighted the importance of social networks for facilitating access to autonomous housing. In this regard, the Housing Agency representative and AkiDwA stressed the importance of programmes that aim to build connections with local communities or other social bridging programmes for supporting people's access to autonomous housing; for example, navigating the systems and supports available.⁴⁰⁴

4.3.4 Developing informational resources

The Peter McVerry Trust representative identified the development of videos of information sessions in different languages as a good practice. They indicated that they had translated a video on their information session on housing transition into

³⁹⁸ Interview with the IRC, December 2023; Interview with Crosscare, December 2023; Interview with Nasc, November 2023.

³⁹⁹ Correspondence with the IRC, March 2024.

⁴⁰⁰ Interview with Crosscare, December 2023; Interview with the IRC, December 2023; Correspondence with the IRC, March 2024.

⁴⁰¹ Interview with Crosscare, December 2023; Interview with the IRC, December 2023; Interview with Nasc, November 2023.

⁴⁰² Correspondence with DSP, April 2024.

⁴⁰³ Interview with Housing Agency representative, January 2024.

⁴⁰⁴ Interview with AkiDwA, December 2023; Interview with Housing Agency representative, January 2024. Correspondence with AkiDwA, March 2024.

17 different languages, and that they can send the appropriate version to clients. The organisation has developed other resource packages as well, and a YouTube page that provides additional information to support BIPs' transition from IPAS accommodation centres.⁴⁰⁵

4.3.5 Transitioning out of homelessness

Crosscare identified high-quality family hubs as an example of good practice in helping people to exit homelessness.⁴⁰⁶ Family hubs are a model of emergency homeless accommodation for families experiencing homelessness and are superior to private emergency accommodation such as hotels and B&Bs in that they aim to create a more stable environment. They are usually run by NGOs, and high-quality family hubs sometimes provide own-door or self-contained accommodation, as well as wraparound supports to help people to exit homelessness. While their quality varies hugely, Crosscare reported that these hubs have much better move-on rates, as the stability they provide leads to people having more time to search for accommodation and also enables them to work.⁴⁰⁷

⁴⁰⁵ Interview with the Peter McVerry Trust, March 2024.

⁴⁰⁶ Interview with Crosscare, December 2023.

⁴⁰⁷ Interview with Crosscare, December 2023.

CHAPTER 5

Conclusion and policy implications

This report provides an overview of the law and policy in relation to access to autonomous housing for beneficiaries of international protection (BIPs). It also discusses the related governance structures and services, coordination between actors, and outcomes and barriers to accessing autonomous housing for BIPs. BIPs comprise an increasingly large group and face substantial challenges accessing housing, with significant implications for individuals and for the capacity of the reception system. This report aims to fill a gap in understanding around policy, governance and services relating to housing for this group and the impact these factors have on their housing outcomes.

Significant mainstream and targeted supports are identified, as well as multiple forums for coordination, and examples of good practice. The report also outlines challenges and gaps in support provision. In terms of outcomes, it concludes that while some BIPs can access autonomous housing, overall this group experiences significant challenges in trying to do so, as shown by the large percentage of International Protection Accommodation Services (IPAS) residents with status. To understand why this is the case, this report outlines barriers to access to autonomous housing, covering both barriers relating to the characteristics of BIPs and barriers stemming from state policies and the Irish reception system.

The main barrier identified in this report is insufficient supply of rental and affordable housing, in particular in areas where BIPs want to live. Other issues identified include: the (in)adequacy of support schemes like the Housing Assistance Payment (HAP); a lack of coordination between different government departments and/or local authorities; and a lack of clarity and knowledge among frontline workers in local authorities. Overall, the most important challenges for BIPs are mainstream ones that also affect the rest of the population, and that therefore require mainstream solutions.

However, echoing previous Irish research, specific disadvantages experienced by this group were identified, which are exacerbated by the highly competitive housing market as well as broader, mainstream challenges. While some of these relate to the characteristics of this group (such as language barriers, discrimination, and knowledge of the system), many relate to the policies in place for this group. Barriers were identified resulting from the lack of long-term planning in the dispersal system, the length of the protection process, and the IPAS policy of transferring those with status to different accommodation, for example.

While these challenges are significant, good practices identified represent potential avenues for improving outcomes. Aspects of these practices include

wraparound supports, multiagency approaches, improved coordination and communication, and early integration interventions, all of which could improve outcomes in the shorter-term. However, long-term solutions are needed in order to address the sources of barriers and challenges in this area – the housing crisis, issues around communication between different actors, and long-term thinking in the reception system for international protection applicants (IPAs).

It is clear from this research that Ireland faces a double challenge at present: a broader, mainstream challenge in relation to housing and public services in general, and the more specific challenge of developing institutional capacity to address the relatively recent phenomenon of inward migration. While this report focuses on Ireland, it is important that in making changes, we draw from the experiences of countries with a longer history of inward migration and managing fluctuating international protection arrivals. To this end, evidence from other European countries can provide important insights for Ireland, and help to identify common challenges.

The European-level synthesis report on the same topic (EMN, 2024), which is linked to this report, identified extensive use of supports targeted specifically at BIPs in response to their additional needs, alongside mainstream supports. Nevertheless, the synthesis report demonstrates that many European countries confront similar challenges in the provision of services to support BIPs to access autonomous housing as Ireland. These include, for instance, challenges related to administrative obstacles, discrimination by landlords and language barriers.

The European Migration Network (EMN) (2024) also highlights examples of good practice, such as cooperation agreements, joint platforms, and regular meetings and exchanges to improve coordination (EMN, 2024). Early provision of information on access to autonomous housing is also identified as good practice, as is promoting the overall integration of BIPs, supporting them to build social networks and improving coordination between actors (EMN, 2024).

5.1 LIMITATIONS AND FURTHER RESEARCH

There are multiple limitations to this research. Firstly, the methodology focused on stakeholder interviews, rather than analysis of quantitative or administrative data. There is a lack of data on this topic, as IPAS does not track this group once they leave IPAS accommodation, and no specific surveys of this group have been carried out. Nationally representative surveys are generally not sufficient to capture a relatively small group and housing data are not disaggregated by immigration status/initial reason for entering the country (or even nationality in the case of Eurostat data).⁴⁰⁸ It was therefore not possible to examine the characteristics (such

⁴⁰⁸ Even if surveys collected information on immigration status, this would not capture those who had naturalised.

as language, ethnicity, location, employment status and family status) of those who access and those who do not access autonomous housing in an effort to better understand how these variables impact access. Neither did we collect primary data from BIPs. Consequently, conclusions on how individuals access autonomous housing, and where they found autonomous housing, for example, cannot be drawn. These are all potential avenues for future research.

There was also a lack of data on the quality of housing accessed, and what happens to BIPs once they access autonomous housing. The findings of this report suggest that there is currently no follow-up mechanism to track outcomes for BIPs once they leave IPAS accommodation,⁴⁰⁹ which makes it very difficult to analyse their housing pathways over time.

Regarding avenues for future research, this report has demonstrated that it is unclear exactly how and when migrants (and refugees in particular) are incorporated into housing and development plans at local and national level, and where there may be potential gaps in this planning. Avenues for further research on this could include both Irish and comparative European studies. Additionally, there is a need for increased data to allow for future research on how the new LAITs contribute to housing outcomes through improved access to services. As they become more established in local authorities, it would also be useful to examine how they are incorporated into different governance structures, and their outcomes in terms of coordination and improved integration and housing access.

5.2 POLICY IMPLICATIONS

This report has several significant policy implications, with stakeholders consulted making multiple recommendations to improve access to autonomous housing for BIPs. These implications should be read alongside the European-level summary report on this topic, which identifies good practices and models in other European countries (EMN, 2024).

5.2.1 Mainstream housing policy

This report highlights significant challenges resulting from mainstream housing policy for BIPs. Constrained supply of both social housing and private rental accommodation, as well as major affordability issues in the private rental sector, is a major challenge confronted by BIPs in Ireland. The findings demonstrate that this issue significantly impacts outcomes for BIPs trying to access autonomous housing, whose additional disadvantages have serious implications for outcomes in a highly competitive market. To improve access therefore, improved supply is needed, particularly social housing and affordable rental accommodation, as well as

⁴⁰⁹ Interview with IPAS, January 2024.

consideration of the different needs and characteristics of BIP households in housing frameworks (Bieri, 2024).⁴¹⁰ The findings on the mismatch between the Irish social housing stock and the household sizes of BIPs indicate that addressing this mismatch could improve outcomes for BIPs.

While increased supply of mainstream social and affordable housing is crucial, examples from other European countries indicate the value of a targeted supply for BIPs. EMN (2024) highlights a funding programme through which municipalities are supported to create housing for BIPs. The funding is limited to investment and can only be used for measures that result in new, additional housing for long-term accommodation.

5.2.2 Wraparound supports

Several stakeholders raised the need to approach the issue of autonomous housing not only from the perspective of housing needs, but also access to wraparound services in the context of factors such as: the integration needs of BIPs (e.g. employment, language skills, education, primary healthcare, etc.); psychological problems among BIPs; and long-term dependency as a result of institutionalised accommodation.⁴¹¹ Stakeholders indicated that a multiagency approach is critical to ensuring support for BIPs and enabling long-term integration. The role of LAITs in working towards this approach was highlighted by multiple stakeholders. The potential for these teams to be expanded in proportion to the number of IPAs/BIPs in an area was noted by UNHCR Ireland.

The model of wraparound supports provided to resettled refugees (see Box 4.1) was highlighted by four stakeholders as a potentially promising avenue for BIPs; adopting a similar model for this group could improve both housing outcomes as well as their ability to live autonomously and integrate successfully.⁴¹² Innovations and structures from other areas such as homelessness (e.g., the co-location of NGOs in local authorities, a multiagency approach) could also be taken as models of good practice and used to improve access for this group.

It could be interesting to consider models from other European countries and their feasibility in the Irish context. Examples here include individual integration plans, transitional housing in separate centres or through rent-a-room schemes (which Belgium uses), the provision of extensive supports for the transition period, and training social workers to support BIPs (EMN, 2024).

⁴¹⁰ Interview with local authority representative 1, December 2023; Interview with the IRC, December 2023; Interview with Nasc, November 2023; Interview with housing policy analyst, December 2023; Interview with housing policy researcher A, December 2023; Interview with Crosscare, December 2023.

⁴¹¹ Interview with local authority representative 1, December 2023; Interview with local authority representative 2, December 2023; Interview with Housing Agency representative, January 2024; Interview with housing policy analyst, December 2023; Interview with AkiDwA, December 2023; Interview with Nasc, November 2023.

⁴¹² Interview with local authority representative 1, December 2023; Interview with the IRC, December 2023; Correspondence with JRS Ireland, September 2023 and February 2024. See also JRS (2018). *Sharing responsibility, saving lives*. Correspondence with AkiDwA, March 2024.

5.2.3 Targeted housing supports for BIPs

The findings of this report indicate that current services in place for BIPs to access autonomous housing are not sufficient to meet the significant current housing needs or to address the various barriers to access social housing and the private rental sector in the context of significant structural challenges in the Irish housing market. Several stakeholders stressed the need for increased resourcing of high-quality casework that has the capacity to follow cases throughout their entire housing search.

The multi-agency and multi-stakeholder approach discussed in Section 3.2.4 was also broadly acknowledged as the most effective way of targeting complex and multifaceted issues such as access to housing for BIPs. According to EMN (2024), both Germany and Serbia use joint platforms in this area to coordinate access to autonomous housing with other integration services and stakeholders. The findings of EMN (2024) indicate that Ireland is also quite unusual in providing its targeted supports almost exclusively through NGOs, with most countries included in the report providing these through competent authorities, as well as NGOs.

5.2.4 Strategic dispersal

The research clearly highlighted issues arising in relation to where BIPs are accommodated, the services available to them, and the impact of the dispersal system on housing outcomes. Several stakeholders recommended the need to take a more strategic, long-term approach to the geographical location of reception centres for IPAs, and highlighted the importance of considering government policy in terms of the National Planning Framework, local development plans and future housing and employment outcomes upon initial dispersal. As one local authority representative stated:

[W]here people are located matters – you have to consider their future and opportunities.⁴¹³

5.2.5 Capacity building for and communication with local authority frontline staff

Clear gaps emerged in relation to the communication of BIPs' rights to those concerned, an issue that has significant implications for their housing outcomes. Capacity building of frontline local authority staff on the needs and characteristics of BIPs, through training and/or targeted resources, for instance, could improve BIPs' access to information and supports and reduce the requirement for additional support from NGOs. In addition, proactive communication and material provision to frontline staff to notify them of changes to, for example, permission letters could improve clarity and understanding of rights and entitlements.

⁴¹³ Interview with local authority representative 1, December 2023.

5.2.6 Sufficient funding/resourcing of frontline services

Several of the barriers indicated in this report arose from insufficient resourcing of frontline services or services such as housing or emergency accommodation, which led to additional barriers for disadvantaged populations such as BIPs. Ensuring services are sufficiently resourced to meet the presenting needs could therefore improve outcomes.

5.2.7 Formal coordination protocols

Some challenges arose from an absence of communication and coordination between actors, with impacts on access to housing for BIPs. This included a lack of communication with local authorities and the Department of Social Protection (DSP) when IPAs are first placed in reception centres, but also a lack of clarity in relation to documentation. Improving communication and coordination between local authorities and IPAs, as well as those providing on-the-ground supports could facilitate improvements in supporting BIPs to access autonomous housing.

While several forums and avenues of coordination were identified in this research, one issue that was flagged was the sometimes informal or relationship-based nature of the coordination, which meant that it may be reliant on personal relationships and may not continue if people move on. This is particularly concerning in light of the high staff turnover among some services. Formal coordination protocols between agencies or within agencies may therefore support a more sustainable holistic approach to BIPs, and ensure that good coordination practices are codified long-term. Formal coordination agreements are used by several EU Member States to support coordination in this area (EMN, 2024). Such protocols could also support the multiagency approach mentioned above and become a particularly important avenue for the new LAITs.

5.2.8 Family reunification

Similar to previous research (Smith et al., 2020), the findings of this study suggest that there is a significant lack of coordination in relation to reunified families of BIPs, both in terms of long-term social supports and housing, and in terms of access to emergency accommodation and other services upon arrival. Several interviewees highlighted the need for improved coordination in relation to this group, in order to prevent vulnerable people and children ending up in very precarious situations. Enabling family members to apply for a personal public service number (PPSN) or a PPSN appointments prior to their arrival in the State was flagged as a potential means of reducing the likelihood of this happening; another suggestion was for improvements in the coordination of actors for housing upon the arrival of those who come to Ireland through the process of family reunification.

5.2.9 Department of Children, Equality, Disability, Integration and Youth (DCEDIY) transfers

This research showed clear challenges arising from the DCEDIY policy of transferring BIPs with status who were unable to transition to autonomous housing within a certain period of time to a different location. Stakeholders stressed that this relocation often results in BIPs being separated from social networks, a course education, employment and linkages with state services such as healthcare or other supports. In this way it undermines long-term integration as well as other factors that may enable access to autonomous housing. Some stakeholders noted their concern that such transfers can also lead to further challenges for the BIP, including precarious housing. However, one positive aspect of this policy to emerge was that, according to the Peter McVerry Trust, it provided an incentive for BIPs to engage with their transition services.

5.2.10 Administrative changes

Significant administrative barriers emerged regarding BIPs' access to autonomous housing. Some stakeholders suggested that exempting this group from the local connection test could facilitate their access to autonomous housing.⁴¹⁴ Minor changes to administrative procedures such as enabling PPSN appointments to be made for those arriving through family reunification before they arrive, or being able to indicate on social housing lists that a family reunification application is pending could also potentially be impactful to improve outcomes.

5.2.11 Data collection

The lack of data collected on BIPs once they leave IPAS accommodation was identified as a challenge, as this makes it very difficult to track their housing and integration outcomes. Improved follow-up with this group may therefore enable a better understanding of the characteristics of BIPs who successfully access autonomous housing, as well as the characteristics of the communities that facilitate this access. In addition, nationally representative surveys are not sufficient to capture this population. Targeted data collection could therefore provide significant insight that is not currently available.

5.2.12 Promoting social networks

Many stakeholders emphasised the importance of social networks and relationships for BIPs achieving access to autonomous housing. Several also indicated that programmes supporting the building of these informal contacts could therefore improve outcomes for BIPs.

⁴¹⁴ Interview with housing policy researcher A, December 2023; Interview with housing policy analyst, December 2023; Interview with LGMA representatives, September 2023.

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APPENDIX I

European Typology of Homelessness and Housing Exclusion (ETHOS)

	OPERATIONAL CATEGORY	LIVING SITUATION	GENERIC DEFINITION	
Conceptual Category	ROOFLESS	1 People Living Rough	1.1 Public space or external space Living in the streets or public spaces, without a shelter that can be defined as living quarters	
		2 People in emergency accommodation	2.1 Night shelter People with no usual place of residence who make use of overnight shelter, low threshold shelter	
	HOUSELESS	3 People in accommodation for the homeless	3.1 Homeless hostel	Where the period of stay is intended to be short term
			3.2 Temporary accommodation	
			3.3 Transitional supported accommodation	
		4 People in Women's Shelter	4.1 Women's shelter accommodation Women accommodated to experience of domestic violence and where the period of stay is intended to be short term	
		5 People in accommodation for immigrants	5.1 Temporary accommodation/reception centres Immigrants in reception or short term accommodation due to their immigrant status	
	5.2 Migrant workers accommodation			
	6 People due to be released from institutions	6.1 Penal institutions	No housing available prior to release	
		6.2 Medical institutions (*)	Stay longer than needed due to lack of housing	
		6.3 Children's institutions/homes	No housing identified (e.g. by 18th birthday)	
	INSECURE	7 People receiving longer-term support (due to homelessness)	7.1 Residential care for older homeless people	Long stay accommodation with care for formerly homeless people (normally more than one year)
			7.2 Supported accommodation for formerly homeless people	
8 People living in insecure accommodation		8.1 Temporarily with family/friends	Living in conventional housing but not the usual place of residence due to lack of housing	
		8.2 No legal (sub)tenancy	Occupation of dwelling with no legal tenancy illegal occupation of a dwelling	
		8.3 Illegal occupation of land	Occupation of land with no legal rights	
9 People living under threat of eviction	9.1 Legal orders enforced (rented)	Where orders for eviction are operative		
	9.2 Re-possession orders (owned)	Where mortgagee has legal order to re-possess		
10 People living under threat of violence	10.1 Police recorded incidents	Where police action is taken to ensure place of safety for victims of domestic violence		
INADEQUATE	11 People living in temporary/non-conventional structures	11.1 Mobile homes	Not intended as place of usual residence	
		11.2 Non-conventional building	Makeshift shelter, shack or shanty	
		11.3 Temporary structure	Semi-permanent structure hut or cabin	
12 People living in unfit housing	12.1 Occupied dwellings unfit for habitation	Defined as unfit for habitation by national legislation or building regulations		
13 People living in extreme over-crowding	13.1 Highest national norm of overcrowding	Defined as exceeding national density standard for floor-space or useable rooms		

Note: Short stay is defined as normally less than one year; Long stay in defined as more than one year.

(*) Includes drug rehabilitation institutions, psychiatric hospitals etc.

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