

Implementing Alternatives to Direct Provision

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**Irish
Refugee
Council**
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The Irish Refugee Council is very grateful to The Tomar Trust and The Social Change Initiative for their support of its work on ending Direct Provision and implementation of alternatives.

The Irish Refugee Council dedicates this report, and its work to end Direct Provision and improve the protection process in Ireland, to Sharon Waters, Communications and Public Affairs Manager at the Irish Refugee Council 2010-2013.

2 Introduction

2.1 This report has been commissioned by the Irish Refugee Council (IRC) due to an identified need to bridge the gap between the recommendations of the [Advisory Group Report](#) published in October 2020¹ and the Government White Paper due in February 2021, and to guide transition from Direct Provision to a new system of housing for people seeking protection and refugees in 2021 and beyond. This report sets out an alternative approach to housing asylum seekers and refugees in Ireland. The report authors are Campbell Tickell; one of the leading Housing Consultancy organisations in the United Kingdom and Ireland.

2.2 We hope our recommendations and ideas will contribute to the policy discussion and build on and develop the recommendation contained in the Advisory Group Report. That report, reflecting the extremely broad and whole-system approach it takes, does not go into significant detail on its accommodation recommendations. Our report focusses exclusively on developing new models and approaches for housing those seeking sanctuary and refuge in Ireland. We hope it makes a useful contribution to the debate on creating the new system desired by all and mandated by the Programme for Government. Our report builds on the discussion of alternative models in an informed and considered way, considering the views of key stakeholders, including the views of people who have lived experience of the current system.

3 Five Critical Questions

3.1 Our approach addresses and answers five critical questions and challenges:

— Models

What models of accommodation delivery can be used to meet the aim of ending Direct Provision and congregated settings? What are the advantages and disadvantages of those models and what ownership, build and management structures do they have?

— Transition and Timing

How do we transition to those models? What has to occur for them to become live and at what point do they start to deliver accommodation?

— Management and Control

Who should have responsibility for protection accommodation? Who should commission and procure accommodation? Who manages accommodation and how should models be funded?

1. Report of the Advisory Group on the Provision of Support including Accommodation to Persons in the International Protection process.

— **Exiting Direct Provision**

What strategy should be used to wind down Direct Provision?

— **Risk Analysis**

What risks are associated with each model and this wider policy challenge?

4 Methodology

- 4.1 Our report has been developed through a process of desk research (all documents reviewed are set out in Appendix 1) and a web-based questionnaire seeking views from key stakeholders, followed by one-to-one discussions with eight key stakeholders (listed in Appendix 2). In addition, we conducted two focus-group meetings with people who have lived experience of Direct Provision. Due to Covid-19 restrictions, these meetings and interviews took place via phone or online through zoom.
- 4.2 Our work has been further informed and developed through regular discussions with Peter Minnock, Dr Orla Hegarty, and Peter Stafford BL (See Appendix 3 for biographies), who formed a sounding board to test assumptions, conclusions from desktop research and recommendations as they evolved.
- 4.3 We have taken account of a range of views and perspectives from these different contributors to arrive at a proposed pathway that seeks to promote the movement of refugees to their own-door accommodation while ensuring that people who are vulnerable and who require additional support are assessed and have their needs provided for.
- 4.4 We would like to thank all those who participated in our research and gave us their views and insight into their experiences; our proposed approach could not have been developed without their time and generous contributions. The recommendations which underpin this report are the views of Campbell Tickell only.

5 Executive Summary and Recommendations

This report contains several recommendations and ideas that aim to assist Government and all stakeholders in creating new housing policy for people in the international protection application process. This section aims to distil and summarise them.

Responsibility:

- The responsibility for protection accommodation should rest with the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) in the short term. However, in the longer-term responsibility should move to the Department of Housing, Local Government and Heritage (DHLGH) when certain indicators are met and the recommended models are delivered. Ultimately, this is a housing policy issue and it belongs in the government department with oversight of housing policy in Ireland. In the short term, the outright merger of accommodation policy for those in international protection with mainstream housing and homeless policy is to be avoided.
- In addition to the above, the accommodation of people seeking protection and refugees should be included in national and local housing development plans, regional spatial strategies and in the mandate of the Land Development Agency. If national guidelines on housing and planning do not include mention of refugees and people seeking protection, the objective of working to ensure integration will not be reflected in policy implementation at either a national or regional level.

Three stage process:

- We agree with the ‘three stage’ accommodation process recommended by the Advisory Group. It is important to note that approximately 875 Stage 1 reception ‘spaces’ will be needed if the Stage 1 process is kept to a minimum of three months and the number of protection applications remains at 3,500 per year or below. As the Advisory Group Report recognises, this could be a significant pressure point upon which other parts of the accommodation system fails.
- Several stakeholders warned that there is a risk that reception centres, if onward accommodation cannot be sourced, may simply become the main housing system for refugees and we revert back to repeating the problems of the current system.

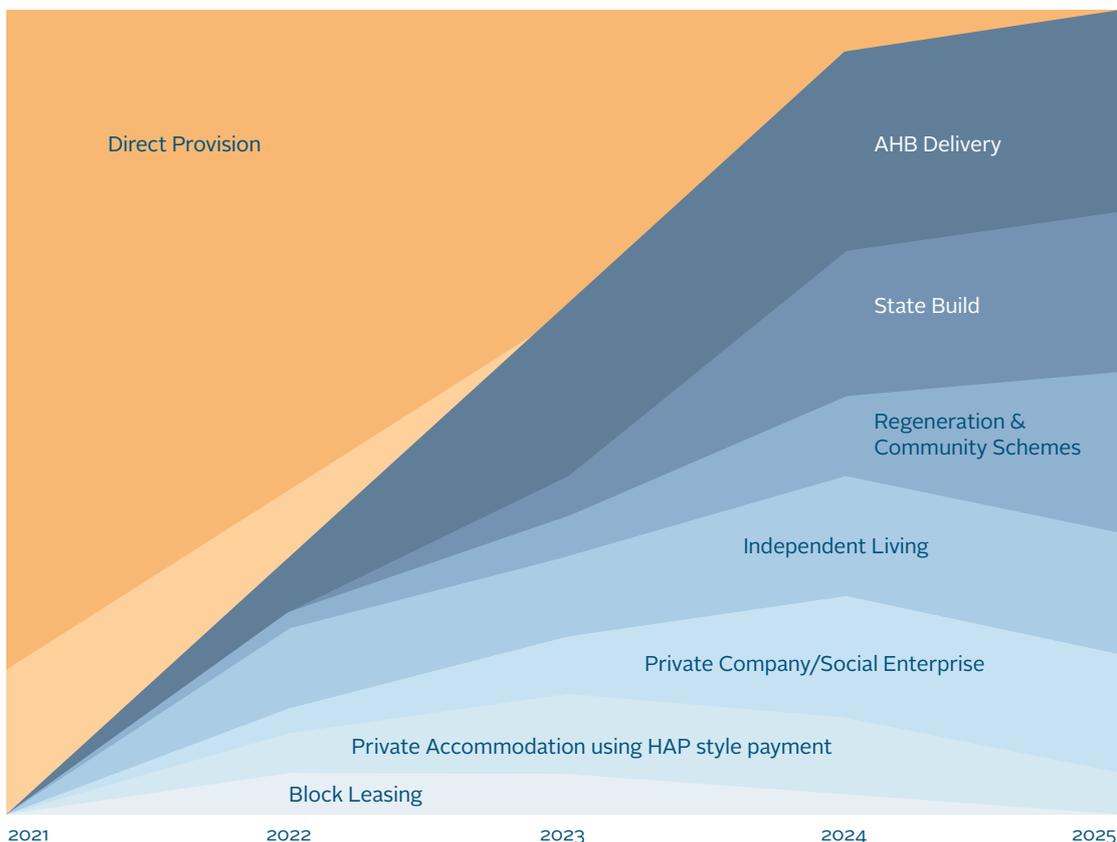
Models of accommodation:

- Rather than using a single model, a blend of models should be used. There are risks with using different models, principally the challenge of co-ordinating and monitoring their implementation. However, there are also significant advantages, not least that a variety of streams will be needed to meet the demand for accommodation. Some streams can mobilise more quickly than others. As far as possible ‘new’ accommodation supply models should be pursued so that supply is not drawn from existing sources. However, all actors,

including the DHLGH must accept that some existing supply will have to be used for this purpose. Accepting, and ultimately supporting this, is an important part of moving protection accommodation in to mainstream housing policy into the future.

- While we dispute some of the observations of the DHLGH on the Advisory Group report, it makes valid points around the possible lack of capacity in the private rented sector and the need to identify new streams of accommodation supply.
- In this report we project over four years a percentage of how much each accommodation model will supply. These are reasoned projections presuming that the necessary policy changes are put in place. Creating momentum is essential not least for people experiencing the current system. Therefore, new models of accommodation need to be brought on stream by mid-2021. Reflecting the need for urgent momentum, several accommodation pilots should be committed to over 2021.
- Very precise and particular approaches should be used to trigger the implementation of each model of accommodation. This report gives some guidance on how each model could proceed. However, there may be a need for specific implementation plans for each model.

Accommodation Type: Old vs New Models



- The introduction of new models of accommodation should commence as soon as possible and not wait for the existing protection backlog to be reduced.
- Various existing urban and town regeneration and renewal policies could be used to either accommodate people and be leveraged by accommodation providers. While likely to be small in the immediate short term, these have significant potential and provide a win-win for delivery of other government housing and regional development policy goals if done well.
- The non-profit aim of the Programme for Government, that was widely supported in stakeholder interviews including by the Irish Refugee Council, should guide the process. Insofar as possible, an approach that contributes to wider, progressive housing policy, should be used. However, in the short term in particular (2021 and 2022), it is unrealistic for this to be the sole model for delivery. Swift implementation of independent inspections and National Standards may mitigate the perceived risks (e.g. variable quality of accommodation) of a for-profit approach.
- In addition, non-profit and for profit are arguably crude terms which disguise the nuance of certain approaches. For example, for profit models can return profit back into their model to support better delivery in the style of a social enterprise.
- Any new model should carefully consider, whether by accident or design, it is contributing to segregation or whether it is aiming to achieve equality between people seeking protection and their peers in Irish society. In our analysis, for a 'mainstream' approach (i.e. the merging protection and housing policy and practice) to be viable, it requires a homelessness prevention policy and implementing infrastructure that works and a well-functioning housing market, able to meet the housing needs of all people effectively. Neither of these two essential building blocks are in place at the moment.

Role of local authorities:

- The Advisory Group recommended delegating responsibility to local authorities but recognised there are a variety of ways that local authorities could accommodate people. The Group also recognised that particularly vulnerable people may not be best accommodated through local authority provided accommodation. Therefore, there is significant latitude in how a local authority could discharge its responsibilities to house people going through international protection. While local authorities should be involved in this process, particularly in the longer term, significant doubts remain as to whether they are best placed to manage the delivery of accommodation.

- We suggest an approach involving regional 'Accommodation Committees' to identify needs and commission accommodation. This model aims to include local authorities, but does not place sole responsibility on them for addressing accommodation issues - rather they facilitate the sharing of responsibilities across several stakeholders.
- In the shorter term, there is a risk that whether or not accommodation should be delivered by local authorities' is a distraction; the focus should be on identifying streams of accommodation and bringing them online as soon as possible.

Control, responsibility and commissioning:

- Who controls the model(s) of accommodation is a critical question. Any new approach will require agility and dynamism, particularly around procurement. Government track record on procuring public housing is relatively poor. Control could be with a single body or spread across different bodies according to the characteristics of each model. Models will exist independently and some may only bring supply online in the medium term. A Programme Management Office (PMO) style body should be considered to manage the implementation accommodation.

Funding, value for money and costs:

- We have prepared costings on the models recommended but due to several models being recommended and the complexity this entails, we have not published them. It is essential that there are sufficient financial resources – capital and current - allocated for the whole term of this reform programme from 2021. A 5-year capital funding allocation is needed for protection accommodation.
- There will be a period of considerable spend increase as capital investment increases and legacy contractual arrangements are wound down, and therefore total public spending in this area will actually increase in the short term.

Strategy to wind down and end Direct Provision:

- There should be a clear strategy to end Direct Provision: This means focussing on closing emergency accommodation by the end of 2021, not renewing Direct Provision contracts when they expire and ensuring that all new applicants from mid-2021 are channelled towards the new system.

Advisory Group recommendations and ‘whole system’ approach:

- The swift implementation of the recommendations of the Advisory Group are crucial, in particular around reducing processing times and the ‘case processing’ recommendation so that as few people as possible are brought across from the old system to the new.
- Approximately 2,895 people could possibly benefit from the ‘case processing’ recommendation (See Advisory Group paragraph 6.2) with a path being laid for them to leave Direct Provision. However, this case processing process scheme will take time to implement and then a further period of time for people to move out of Direct Provision. Creating a new system with no starting population is a completely different proposition than a new system that begins with approximately 7,000 people on board.

6 Vision Statement

- 6.1 Our proposed approach is based on a theory of change that believes immediate sanctuary and a safe home are fundamental steps to setting down roots and becoming embedded in a new community for people seeking protection and refugees. We also believe that a safe and humane approach to the status process, with a clear assessment of needs and a secure place to stay while waiting results of the process, gives people the best chance of integrating in to Ireland.
- 6.2 Ultimately, we want people to have accommodation that provides them with stability, a chance to recover, put down roots and contribute their skills and experience to enrich Irish society, and a place to call home that facilitates employment, access to education, health and wellbeing services and also enables community integration.
- 6.3 We know that the alternative to the system of Direct Provision has been debated for a number of years. Our model is, we hope, a useful contribution to this debate as government moves forward to public consultation and decision-making.
- 6.4 Will it work? We believe it will because it has been informed by evidence from other jurisdictions and existing research. We have used a robust multi-method approach informed by the literature review and the perspective of different stakeholders.
- 6.5 Can people support this model? We believe people will support the approach we propose because it incorporates the multiple perspectives of policy makers, state and local officials, the different government department stakeholders, housing providers including Approved

Housing Bodies (AHBs), supported housing and homelessness providers, private sector housing providers, charities working with asylum seekers and refugees, and most importantly, people with lived experience of the current arrangements.

- 6.6 Our proposed approach will mean that the responsibility of providing safe sanctuary and stable housing is shared between the public, private and charity sectors, and local communities and that a humane, equitable and safe housing response can be delivered at best value to the wider community and to the taxpayer.

7 Guiding Principles

- 7.1 We recommend a number of core principles that should underpin the new accommodation and support pathway model regardless of what stage a person has reached within that pathway. These are:
- Instilling the principle of promoting integration from day one rather than integration from the point someone receives a positive decision on their application for international protection. Scotland's 'New Scots' Refugee Integration Strategy is a good example of the benefits of people being supported to integrate into communities from day one of arrival, and not just once protection has been granted.
 - The whole process from Reception Centre to Stage Two accommodation to Stage Three move on accommodation, if the application for international protection is successful initially or after appeal, should be based on 3 important guiding objectives:
- 7.2 **Objective 1** – To deliver effective and practical help and support to all protection applicants. This help and support should assist them to make timely and realistic decisions about their accommodation and other needs and the options available to them for access to services. The support should help them to plan, from the earliest stages of the process, their future life in Ireland, including their realistic options regarding accommodation type, tenure and location. The accommodation pathway should be based on the constraints of the legal rules for those claiming international protection, on the principle of self-help and resilience for those who are able to help themselves and early intervention actions for those who are vulnerable.
- 7.3 **Objective 2** – To be effective in identifying those individuals and families who are most vulnerable or will struggle to make fully informed decisions and take proactive action to protect them. This would involve early identification of housing and support needs including

those in need of supported housing or specialist support (mental health, post-traumatic stress disorder, victims of torture etc.). It will also require a process for determining whether they will require on-going or continued support as part of their Stage Two and eventual move on accommodation to ensure that they are able to sustain their accommodation or access mainstream services to help them to do so. Crucial to this process is the implementation of the vulnerability assessment, required by Irish law and now over two years overdue.

7.4 **Objective 3** – To promote ‘self-help’ and independence.

The accommodation and support pathway needs to avoid perpetuating the short- and long-term dependency that is endemic in the Direct Provision model. The operation of the current model results in people quickly becoming institutionalised and dependent as result of having decisions made for them, with no real say in decisions that will fundamentally impact on both their short term and long term future.

7.5 The new system should promote personal resilience by emphasising people’s rights as well as promoting the taking of personal responsibility within the constraints of the legal system of international protection. This means everyone applying for international application should not only have a right to accommodation but also a right to be fully involved in the decision-making process regarding their move on accommodation and any support and wrap-around services they may qualify for, with the state acting as enabler. This should be based on a relationship of trust and transparency, and on maximising people’s realistic choices.

8 Stage 1 Reception Centres

8.1 We agree with the Advisory Group recommendations around ‘Stage 1’ Reception Centres with people moving to ‘Stage 2’ accommodation.

8.2 Approximately 20 centres will be needed, of between 50-100 units each. It is recommended these are dispersed geographically in line with the five major cities identified in the ‘National Planning Framework 2040’ (Dublin, Cork, Limerick, Galway and Waterford).

8.3 This would provide an annual capacity of 1,500 units of accommodation to house 3,500 people, taking into account the move through to Stage 2 accommodation and some flexibility to the three-month maximum stay, as well as accounting for voids and the need for capacity to self-isolate brought about by Covid-19. We would envisage, in line with the profile of people in Direct Provision, that approximately 57% of the units would be for single people, with some units ring-fenced as women only accommodation, and approximately 43% of units for families with children.

- 8.4 Reception Centres should be State owned where possible. This recommendation is based on the clear evidence that State-owned facilities can be delivered at lower cost than those delivered by commercial providers. Another challenge to this model will be how the State attempts to procure these centres. As the Advisory Group report notes, Baleskin Reception Centre is not State owned, and its contract is due to expire in 2023. This is a strategic weakness going forward.
- 8.5 We have calculated that there is then a further need for approximately 3,000 units of Stage Two accommodation to achieve the move through of 3,500 people a year from the Reception Centres. This figure takes into account the length of time required for a status decision (including on appeal) and delays in removal to arrive at the number of Stage Two units required.
- 8.6 We agree with the Advisory Group recommendations about how Reception Centres should be delivered to ensure that applicants for international protection receive a far better experience than under Direct Provision. Many of these recommendations are sensible, for example, the requirement to assess any vulnerability on entering a Reception Centre. Some of the recommendations require more operational detail on how an effective induction and assessment process should work and our proposals set out to address this. We also have a number of operational recommendations designed to build on the Advisory Group Report recommendations. These are set out below.

Number, scale and distribution of Reception Induction and Assessment Centres

- 8.8 We have considered the number required, the scale and distribution of Reception Centres and this section sets out our recommendations for these. Of critical importance is the need to avoid replicating the problems inherent in the Direct Provision in the new Reception Centres. These must be different in terms of location, ethos, putting people first and designing the provision around the needs of the people seeking protection. The new model must deliver a fundamental shift from the current induction and assessment approach and ethos.
- 8.9 The Advisory Group recommends that there should be sufficient Reception Centre capacity to accommodate a throughput of around 3,500 applicants per year based on a three-month stay. We agree with this estimate. This would require 875 reception places, perhaps with an additional buffer to account for the three-month target not being met.

- 8.10 There must be sufficient capacity in the system to ensure that there is no longer a need to spot-purchase costly hotel or similar emergency accommodation if numbers were to increase. The current spot purchasing of emergency accommodation for up to 1,000 households costs €30 million. To avoid the need to spot-purchase emergency accommodation when Reception Centres are full, the model for the number of units required should not be based on working at full capacity. If a system is always based on 100% occupancy problems can occur. Capacity will be needed for voids, delays and self-isolation. There is also the issue of the national Covid-19 emergency and the need to be able to deliver accommodation for people who need to self-isolate.
- 8.11 We therefore recommend that 1,500 units of Reception Centre accommodation is provided. This would allow for circumstances where the three-month target cannot be met, such as in the initial years as the system gears up to process applicants more quickly.
- 8.12 Reception Centre provision should be of good quality and should be of sufficient size to be run effectively and economically without compromising the safety of residents. We recommend that individual Reception Centres range in size from 50 -100 single room and family units. As noted above to mitigate the risks of reception centre stay accommodation being longer than three months, as far as possible own cooking and washing areas, particularly for families should be provided.
- 8.13 Given the above assumptions we propose that 20 Reception Centres are required. Obviously, the greater number of people in a centre the fewer centres will be needed. Having a greater number of reception centres possibly reduces the risk of blockages and a lack of capacity and increases safety by ensuring that vulnerable people are not lost as they might be in a large centre.
- 8.14 We recommend that these be evenly distributed across Ireland and to support the objective that move-on from the Reception Centres should be evenly spread across the country. We recommend that the location of the reception centres should be based on the [National Planning Framework: Project Ireland 2040](#), which has identified five major cities. These are: Dublin, Waterford, Limerick, Cork, Galway.
- 8.15 The above would require significant capital investment. This does not all have to be new build provision and consideration should be given to purchasing private sector facilities. This could include, as recommended by one stakeholder interviewed, an audit of existing Direct Provision facilities, if they are appropriate in terms of size, location and quality.

The role of the Reception Centres in helping to deliver successful move-on

- 8.16 The role of the Reception Centres in delivering a successful next stage move-on accommodation outcome is critical. The Advisory Group report recommends the urgent implementation of vulnerability assessments, as required by Irish law. In addition, we recommend that all individuals and families should receive a housing and support needs assessment which the person has a statutory right to receive in the form of a 'Personal Plan'.
- 8.17 The Personal Plan would retain housing as the key focus, but would also consider housing and support needs not just for the Stage Two accommodation but should be used to begin the process of discussing realistic longer term housing options if their application for international protection is successful.
- 8.18 A team of officers to deliver this service outside of the management of the building should be funded by the State for each Reception Centre. The role of the team of Reception Centre Support Officers would be:
- To assess and identify very vulnerable households as per the Advisory Group report recommendations;
 - Assess and deliver a Personal Plan for all individuals and families;
 - To match households to their chosen region in good time for the accommodation move to be properly planned and wrap-around services arranged;
 - To work with and support individuals and families to find their own accommodation with friends, family or through the private sector where that is their choice.
- 8.19 The Personal Plan would consist of an assessment of accommodation needs and gathering of information to help make decisions on the suitability of accommodation to be offered. For example:
- The size of accommodation needed;
 - The type of housing, for example, where a person may need ground floor accommodation because of an assessed disability;

- Whether accommodation with support is required because of mental health issues, substance misuse issues, or accommodation with support appropriate for a victim of torture, trafficking, or sexual violence.

- 8.20 The assessment process for the Personal Plan would include giving clear facts and information on realistic Stage Two accommodation options to enable people to make informed choices about their housing future. There would need to be clear information on the housing schemes or housing options they do, or may qualify for, including social housing, private rented sector, charity sector and community based initiatives.
- 8.21 This information is critical given that decisions made about Stage Two accommodation are likely to shape an applicant's long-term accommodation future if their application for international protection is successful, including the location of that accommodation. The aim would be to deliver assisted choice through working with the person or family on the advantages and disadvantages of the different accommodation options available, taking into account their needs.
- 8.22 The Personal Plan would also focus on assessing education, training and employment needs and current skills, providing specific information on the range of opportunities available in the Stage Two accommodation areas. Discussions on access to employment, would include covering the current rules or any changed rules, depending on decisions made by the Government regarding the Advisory Group recommendations on access to employment.

Tackling the issue of 'no choice' Stage Two accommodation versus choice

- 8.23 We believe that "no choice" dispersal should be avoided wherever possible and a system is used which is based on respecting people's choices, especially where there are existing friendship, family or community support networks. There should be assisted choice of realistic Stage Two accommodation areas; settlement is generally more successful when people have some choice. However, this would not be unlimited choice. Our recommendation that Reception Centres are based on an even regional distribution will, we believe, enable more people to be accommodated within the region (or close to the region) where the Reception Centre is located rather than in a completely different region.
- 8.24 The choice of a new applicant should be taken into account when deciding which Reception Centre they need to be placed into, especially where an application has been made in-country

given such applicants are more likely to have established social networks whilst living in Ireland. Choice still has to be realistic given a large number are more likely to want to remain in Dublin, given community support networks and employment opportunities.

- 8.25 Applicants should also be given the choice of sourcing their own accommodation with friends or family or into the private sector whilst they wait for a decision on their protection application. For those that wish to pursue this option, they should be supported to achieve this during their three-month stay in the Reception Centre. It is through this option, expanded on in greater detail below in Model 7, that Private Rented Sector accommodation may be delivered in greatest quantity. Where the option to find their own private sector accommodation is pursued, any accommodation sourced must be suitable and the rent would need to be within the Homeless Housing Assistance Payment allowance set for such accommodation. This should include the funding of rent in advance or a deposit.
- 8.26 The current system disincentivises people from finding their own solutions by making them ineligible for the daily expense allowance if they do not choose to live in Direct Provision and also difficulties around accessing a Medical Card. To remove this barrier, we recommend that this allowance for applicants making their own accommodation arrangements should be paid at the same rate as those who take international protection accommodation.
- 8.27 Applicants who secure their own accommodation with friends, family or through renting should not be penalised if this breaks down and they subsequently require accommodation. We note from stakeholder interviews that Covid-19 has increased considerably the precarious nature of people's situation: lost work and flat sharing arrangements falling through have likely decreased the number of people who can live independently.

nature of people’s situation: lost work and flat sharing arrangements falling through have likely decreased the number of people who can live independently.

<p>Stage 1</p>	<ul style="list-style-type: none"> — Approximately 20 centres (based on a capacity of 50-100 units each); fewer centres means greater number of people — Geographically dispersed: Dublin, Cork, Limerick, Galway and Waterford — Annual, total capacity of 1,500 units of accommodation to house 3,500 people, taking into account move through to Stage 2 accommodation — This includes some flexibility to the three-month maximum stay and accounts for voids and the need for capacity to self-isolate brought about by Covid-19 — Approximately 57% of the units would be for single people, with some units ring-fenced as women only — Onward accommodation directed by personal pathway plan
<p>Stage 2</p>	<ul style="list-style-type: none"> — Accommodation delivered via the 8 streams set out below. Accommodation type: own door within community. Capacity for 3,000 units.
<p>Stage 3</p>	<ul style="list-style-type: none"> — Post decision accommodation. Mainstream provision. Own-door accommodation. 1,275 people per annum. Private and social housing.

9 Stage 2 Accommodation Models

9.1 Having looked at Stage 1 accommodation we now explore possible models for Stage 2 accommodation.

9.2 In determining our proposed model, we explored eight different approaches to the provision of accommodation, some are distinct models of accommodation, some are policies to enable independence.

Model 1: Community led and regeneration policies:

Name and Summary	Implementing body	Funding streams	Advantages	Disadvantages
<ul style="list-style-type: none"> — Variety of mechanisms that can be used — These can be divided into policies for urban and rural renewal and specific grants and policies for regenerating housing and Community Sponsorship — Can include a specific drive to upgrade a portion of the approximate 180,000 vacant homes in Ireland, a relatively untapped supply <p>Community Sponsorship and other forms of community involvement:</p> <ul style="list-style-type: none"> — Adapt the existing community sponsorship programme to protection applicants — Use other forms of community organisation similar to Area Based Childhood (ABC programmes) <p>Utilise Regeneration policies including:</p> <ul style="list-style-type: none"> — National Planning Framework — National Vacant Housing Reuse Strategy — Town Centre Living Initiative — Town Centres First programme for government commitment 	<ul style="list-style-type: none"> — Dependent on policy and or Department 	<p>EU funding initiatives:</p> <ul style="list-style-type: none"> — Urban Innovative Actions — European Regional Development Fund — European Social Fund Plus — Asylum and Migration Fund — Invest EU — EIB 'Disasters Reconstruction' loan <p>Specific construction policies that could foster and enable models:</p> <ul style="list-style-type: none"> — National renovation strategy — Repair and Lease Scheme 	<ul style="list-style-type: none"> — Alignment with other government policy and objectives, including energy grants, repair and lease scheme, vacant property development — Can contribute to local construction employment — Overcomes barriers of local opposition due to investment, support services — 'Quick', as refurbishments take months, not years and no new infrastructure required, — 'Sustainable'- as short-term housing can roll-over into long term and residents have flexibility for long-term in same community — Easier and better to 'add' new communities/ host towns than to move people around — Meet the challenging of providing accommodation but also wider regeneration policies — Huge potential in the power of communities — Can contribute to direct community buy in which is absent from some other proposals — Assists in rural and urban regeneration — Reduces criticism that housing for protection applicants is drawing from the same source as mainstream housing — Possible adoption of AHB approach to harvest community endeavour across spectrum of new build, regeneration or link with community services/buildings — Opportunity to prioritise community lead projects in terms of access to a range of funding and bottom up service supports 	<p>Practical concerns</p> <ul style="list-style-type: none"> — Some polices are not models in themselves but regeneration tools that could be used by a provider such as an AHB — Difficult to scale — Requires investment in building support of communities to adopt this approach — Variety of policies and tools that could be used that require significant overarching control and coordination — Aligns with broad government policies but needs a whole of Government commitment to invite and reward communities who embrace opportunity to bring forward projects — Risk of reducing people's ability to live in complete independence as opposed to being obliged to live and participate in a community

Model 2: Approved Housing Bodies (AHB) delivery

Name and Summary	Implementing body	Funding streams	Advantages	Disadvantages
<ul style="list-style-type: none"> — Accommodation delivered via AHBs — More suited to clustered style accommodation or pepper potting — AHB could provide accommodation only or wrap around supports if needed — Creating of a new dedicated funding stream for international protection accommodation — Procurement process is amended to allow AHBs to deliver accommodation — Approach should consider creating a new dedicated AHB to focus on protection accommodation or an existing AHB pivots to focus on protection accommodation — 500+ plus AHBs in Ireland: engage the larger but also smaller and local AHBs who may be more nimble — Also consider large AHBs and possible pilot using the Housing Alliance group of AHBs 	<ul style="list-style-type: none"> — Department of Children, Equality, Disability, Integration and Youth responsible but implementation via new arms length 'programme management office' 	<ul style="list-style-type: none"> — Amend existing funding streams to allow eligibility for protection accommodation — Create new funding streams that are attractive to AHBs and comparable to their existing funding lines — Amend Capital Assistance Scheme (CAS) and Capital Advanced Leasing Facility (CALF) to allow pilots 	<ul style="list-style-type: none"> — Non-profit approach which reflects Programme for Government commitment, therefore greater Government buy in — Wrap around supports can be built in if necessary — Reflects statement of Advisory Group that more vulnerable groups may need a different form of accommodation that is not delivered by local authorities — If large amounts of accommodation cannot be re-directed small proportions of accommodation could be leased from AHBs — Recapture origin of AHBs where schemes initiated to address specific or local community need — If pursuing a new body, there is precedent in that a similar body set up for programme refugees 	<p>Barriers to implementation</p> <ul style="list-style-type: none"> — No current funding structure is in place: CAS is linked to social housing lists — Current procurement for protection accommodation has been criticised for narrow focus on larger congregated units and also shorter contracts compared to possible 30-year funding for many AHB — AHBs already occupied by existing delivery commitments and funding streams tied to local and central government — Difficult to scale quickly unless AHBs can provide a proportion of their accommodation stock or stock that is in the pipeline — The option of establishing a dedicated and new AHB will take time; unless an existing AHB pivots to this area as noted

Model 3: State build and State or AHB or other delivery

Name and Summary	Implementing body	Funding streams	Advantages	Disadvantages
<ul style="list-style-type: none"> — This could be led by a Government department or by a type of ‘programme management office’ to take control of the delivery programme — Units could be provided in appropriately sized clusters with communal facilities for support and advice services — A dedicated capital budget line supporting the building over a period of 5 years — Broaden the powers of the Land Development Agency to use land for the purpose of developing the housing needed 	<ul style="list-style-type: none"> — Department of Children, Equality, Disability, Integration and Youth responsible but implementation via new arms length ‘programme management office’ 	<ul style="list-style-type: none"> — State capital funding over a period of five years, possibly using a third party to construct and build (e.g. an AHB or private developer) 	<ul style="list-style-type: none"> — Guarantee of accommodation — Designed and implemented as desired and high degree of control — Possible use of rapid build and/or modular construction — Support of the Department of Housing (see the Department’s Observations on Advisory Group Report) — Use by Local Authorities of Part 8 planning process could expedite provision and re-enforce community engagement aspect 	<p>Practical concerns</p> <ul style="list-style-type: none"> — Potentially long lead in time unless in progress accommodation can be accessed <p>Barriers to implementation</p> <ul style="list-style-type: none"> — Doubts as to whether state authorities are sufficiently resourced in the short term — Current procurement and administrative barriers — State can lead but competition for resources means that alternatives are needed to generate additional supply — Planning uncertainty, although local authority-led planning is more certain than that of private developers

Model 4: Self-funded and independent

Name and Summary	Implementing body	Funding streams	Advantages	Disadvantages
<ul style="list-style-type: none"> Not a 'model' necessarily but a policy approach of increasing people's ability to live independently People seeking protection have right to work and rent accommodation Approximately 22% of people who have applied for protection in Ireland in the last 5 years have not entered Direct Provision 	<ul style="list-style-type: none"> Central government policies that aim to enable and increase independence 	<ul style="list-style-type: none"> Person rents via private sector using own funds, for example through salary income 	<ul style="list-style-type: none"> Allows a person to become completely self-sufficient and independent of the State Requires broadening of the right to work and removing other barriers to independence 	<ul style="list-style-type: none"> Only appropriate to relatively small proportion of people Unclear how many of the 22% live independently through work compared to living with friends or family Increased unemployment due to Covid-19 has reduced the number of people who can live independently

Model 5: private company or social enterprise delivery

Name and Summary	Implementing body	Funding streams	Advantages	Disadvantages
<ul style="list-style-type: none"> Private company purchases or leases accommodation who then contract with Government to provide own door accommodation Two distinct approaches: for profit private developer or landlord or social enterprise, social care company See example of Dídean model 	<ul style="list-style-type: none"> Department of Children, Equality, Disability, Integration and Youth responsible but implementation via new arms length 'programme management office' 	<ul style="list-style-type: none"> Body could have separately organised finance to purchase or rent accommodation Model is scaled as profits can be returned back into the initiative Rolling open tender framework could be used to identify possible accommodation projects that could be drawn down if appropriate 	<ul style="list-style-type: none"> Brings agility and funding and stock that is ready to go Model that is dedicated to people seeking protection (in the case of Dídean) Private provider could reinvest any profit back into the model pivoting to be type of social enterprise Can scale if financing already in place Locking in social ethos by having a social clause in procurement, social enterprise models could be prioritised, limit on profit and requirement to publish accounts National Standards should apply, with inspections, e.g. HIQA 	<p>Practical concerns:</p> <ul style="list-style-type: none"> For profit approach inconsistent with programme for government; unless provider commits to not draw down profits from the company and redirect into the service Unclear if the model can scale significantly Only one known organisation providing this type of model Risk of blurring with existing Direct Provision accommodation if done badly 'Ready to go' stock is predominantly in large, dense apartment developments, which may not be best suited to requirements Ready to go option tends to emerge when market is struggling, or product represents poor value for public purse

Model 6: Local authorities source accommodation using Homeless Housing Assistance Payment or other delivery

Name and Summary	Implementing body	Funding streams	Advantages	Disadvantages
<ul style="list-style-type: none"> — Catherine Day Advisory Group recommendation on local authorities obtaining accommodation, predominantly via the Private Rented Sector — More a mode of control than an actual accommodation model — This would require local authorities to supply a quota of housing units based on county size and population — The housing would be sourced through a place finder style body commissioned by the local authority to find the numbers of units as established by the quota — Wide latitude given to local authorities in what type of accommodation they use 	<ul style="list-style-type: none"> — Local authorities identifying accommodation and being funded to do so on a per person basis 	<ul style="list-style-type: none"> — Payment, equivalent to or the same as Homeless HAP is used to pay landlord for private rented accommodation 	<ul style="list-style-type: none"> — Own door accommodation — Opposite to congregated settings — Considerable scope as to who does what and how it is implemented — Quick to implement if accommodation can be sourced — Person could remain in Private Accommodation if granted status — Possible positive change in Private Rented Sector market post Covid-19 	<p>Practical concerns</p> <ul style="list-style-type: none"> — Fragmented locations and difficult to introduce wrap around support if necessary — Private led with possible problems of perception — Well documented lack of supply of Private Rented Sector accommodation — There are 31 local authorities in Ireland: very difficult to control and monitor 31 modes of operation — Well documented opposition of the Department of Housing via observations on Advisory Report <p>Cost and value for money concerns</p> <ul style="list-style-type: none"> — Some stakeholders criticised approach as ‘dead money’ and no return to wider housing policy and stock in the long term — Depending on the specific market, increased demand may elevate rental prices — Many stakeholders consulted warned the local authority model has risks — Already difficult to leave Direct Provision and find accommodation via the private rented sector

Model 7: Housing Assistance Payment/supplementary welfare allowance

Name and Summary	Implementing body	Funding streams	Advantages	Disadvantages
<ul style="list-style-type: none"> Similar to Model 6 except delivered centrally and purely via private rented sector Similar to pre-Direct Provision accommodation Led by the Department of Housing, Local Government and Heritage (DHLGH) and delivered by local authorities using Homeless Assistance Payment or similar device Similar to Model 1 above but is based on using HAP to enable people to access accommodation through the mainstream housing route. 	<ul style="list-style-type: none"> Central Government via Department of Housing, Local Government and Heritage 	<ul style="list-style-type: none"> Similar to Model 6 but using HAP equivalent payment 	<ul style="list-style-type: none"> Full integration with mainstream housing policy Possible positive change in Private Rented Sector market post Covid-19 Prospect of increasing supply through targeted incentives 	<p>Barriers to implementation</p> <ul style="list-style-type: none"> Considerable resistance from Department of Housing and likely other parts of government as HAP enables access to social housing list and requirement for habitual residence <p>Practical concerns</p> <ul style="list-style-type: none"> Exposes protection applicants to possible discrimination and possible unsuitable accommodation Well documented discrimination towards minorities who try to use HAP Limited or at least difficult to project supply of private rented sector accommodation Cost and value for money concerns Some stakeholders raised the issue of this being 'dead money' bringing no return to wider housing policy in the long term

Model 8: Block leasing

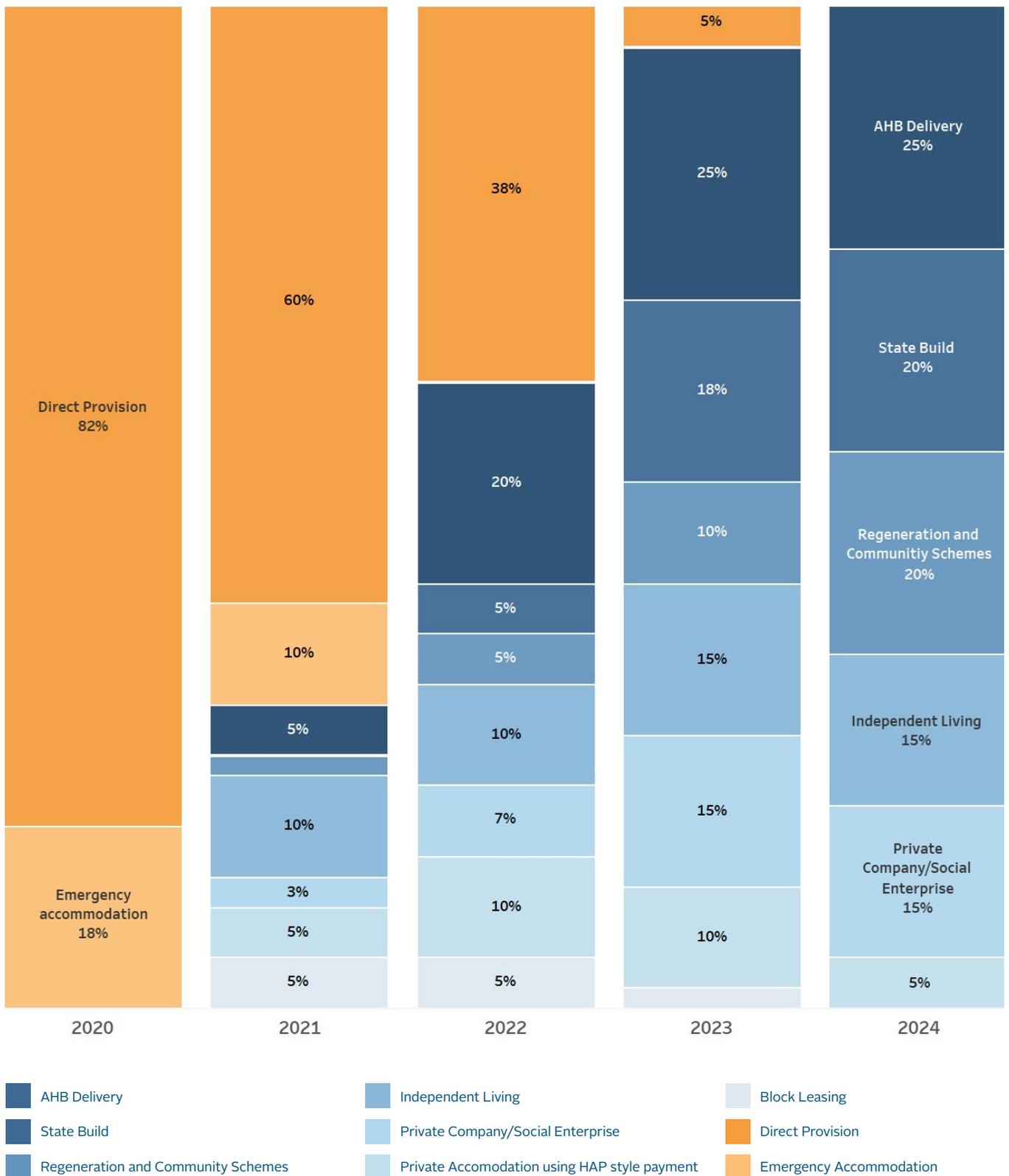
Name and Summary	Implementing body	Funding streams	Advantages	Disadvantages
<ul style="list-style-type: none"> Block leasing by Government directly with a landlord, similar to private company model 5 but fewer or no wrap around supports Examples are in Galway in September 2020 and Ballinamore in November 2019 and most recently in Letterkenny in November 2020 	<ul style="list-style-type: none"> Previously Department of Justice now Department of Children, Equality, Disability, Integration 	<ul style="list-style-type: none"> Government directly contract with a landlord for number of units 	<ul style="list-style-type: none"> Accommodation ready Several stakeholders spoke positively of the Galway experience of accommodation Wider support services could be included in contract with developer People can live in proximity to each other, but not in the same living space Ability to direct services to one location 	<ul style="list-style-type: none"> Doubts over the ability to scale No long-term gain to wider housing policy Possible risk of replicating problems around Direct Provision Cost and value for money concerns Possible very high cost, poor value for money

10 Transitions to New Models of Accommodation

- 10.1 One of the key challenges to ending the current system is creating the required combination of accommodation models, projecting when these can deliver accommodation and what policy changes are necessary to create the environment for them to become realisable. Several stakeholders, including the Irish Refugee Council, have emphasised the need for models that match with progressive housing policy. This included building, regeneration and non-profit approaches compared to reliance on the private sector or leasing. As noted above, this aim will have to be tempered with what is realisable in the time available. A mixture of models is the most appropriate and realistic model to deliver the end of direct provision in the timescale required.
- 10.2 In the following tables we have attempted to project, as Direct Provision and emergency accommodation is wound down, what accommodation streams can realistically be brought online and when. These projections are based on what we believe can be delivered. This transition would need to be aligned with the contract end dates for Direct Provision so the process of winding down existing aligns with the delivery of new accommodation models.
- 10.3 We have estimated the percentage that each of these solutions would contribute to meet the overall provision required. These are informed estimates. The model is based on an 'Accommodation and Support Pathway' enabling, as far as possible, a seamless transition from first stage Reception Centre accommodation with an intended length of stay of a maximum of three months to 'Stage Two' accommodation. If an application for protection is successful, this would lead through to move on accommodation that is, wherever possible, long term, sustainable and avoids the person becoming homeless once they are required to leave their second stage asylum specific accommodation.
- 10.4 This hybrid approach involves:
- Emergency accommodation ending by end of 2021
 - Direct Provision ending by 2023
 - Community and Regeneration initiatives starting slowly, through pilots, but building to provide 20% of supply by 2024
 - Using a combination of large and small AHBs, through pilots, and through a combination of new build, existing developments, starting slowly but gradually increasing to provide 25% of supply by 2024

- State Build starting slowly but gradually increasing, including a focus on reception centres, delivering 20% of supply by 2024
- Independent living starting lower than historical average in 2021 due to Covid-19 issues (recession and unemployment) but gradually to 15% by 2024
- Private Company and Social Enterprise starting slowly but being replicated going forward to 15% for 2023 and 2024
- Private Rented sector being accessible and steadily used from 2021 but decreasing by 2024
- Block Leasing being used in 2021, 2022 and 2023 but being phased out by 2024

Transition to new models of accommodation



Transition to new models of accommodation



11 Model implementation: discussion and recommendations

- 11.1 In this section we make some observations and recommendations on each model and what would be needed to change for the implementation of each individual accommodation solution.

Model 1: Community led and regeneration initiatives

- 11.2 A number of stakeholders consulted believe that a community led approach to delivering accommodation should be pursued. As noted above there are huge variety of tools and approaches that could be used to develop accommodation. Some policies are broad, overarching regeneration schemes. Others are quite particular construction tools that could be used. Stakeholders commented on the huge potential of redeveloping vacant properties. This model could include modifying the existing Community Sponsorship scheme to protection applications to enage the power of communities. Some stakeholders expressed concerns that the model could not deliver on the accommodation numbers required. We agree that at present Community Sponsorship as a delivery model lacks the infrastructure and capacity to deliver at scale. We do believe that this could be grown and that delivering accommodation through a community led approach can play a significant role in the longer term. The potential we believe is significant. Community groups are more likely to be able to deliver a range of innovative solutions.

Recommendations and considerations:

- Expansion of Community Sponsorship could be piloted but expectations should be limited as to how much this could be scaled.
- It is of critical importance for any new model to be developed with the support of local communities and community groups with the needs and interests of applicants for protection at their core.
- Any community approach should be considered against the need for people to be able to access key services including those in Dublin.
- Various possible funding sources exist.

- Vacant properties, within existing communities, are a significant and relatively untapped source. Developing vacant properties have several benefits: a new source, bring new life to communities and increase employment opportunities.
- Several pilots could be created to demonstrate the model.

Model 2: Approved Housing Body delivery

- 11.4 We suggest that in the long term the objective should be to deliver the majority of the units required through new build and acquisition. It is accepted by stakeholders that AHBs are the most appropriate bodies to deliver new build and acquisition. AHBs have the experience of build and acquisition and project delivery structures to make it happen. Some stakeholders however doubted their commitment or focus to deliver. We note that there are examples of large and small AHBs delivering accommodation schemes for people claiming international protection and that there is a role of Government in bringing together AHBs to explain the need and obtain their commitment.

Reflections on the Experience of Housing Associations in the UK

- 11.5 In the UK, similar concerns were expressed when the UK Home Office was developing its protection accommodation model. This related to providing accommodation for the UK protection dispersal contracts rather than new build but the claims of lack of commitment were similar. To address the problem Housing Associations across the UK were brought together through the National Housing Federation and asked to help if there were insufficient bids for accommodation. A commitment was given by many of the large and smaller associations to help. In the end their commitment to help was not called upon, as there were sufficient viable bids from the private sector.
- 11.6 There were good examples in the UK of delivering accommodation through Registered Housing Associations. In 2000 South Yorkshire Housing Association (SYHA) successfully bid to provide homes for asylum seekers under a five-year contract with the UK Home Office. Safe Haven was set up to do this and Yorkshire Housing now have a successful partnership with SYHA to deliver homes accommodation and support under contracts with several local authorities.
- 11.7 In Scotland, Housing Associations, coming under the Scottish Federation of Housing Associations, lease social housing to the private sector company Serco who hold the Home Office contract. Large and smaller Housing Associations in Scotland provide the majority of asylum dispersal accommodation and have done so since the first round of contracts in 2000.

Recommendations and considerations:

- The current procurement process for protection accommodation cannot compete with the benefits CAS style funding offers AHBs. The Department of Justice offer 1-3-year contracts compared to 20-year funding envelopes. There would have to be significant difference between the previous Direct Provision procurement process and any future process. Despite the above, with a strategic approach, AHBs are well placed to provide accommodation.
- AHBs could deliver built accommodation but also a portion of existing accommodation or accommodation in the pipeline, for example through Part V of the Planning and Development Act 2000.
- Serious consideration should be given to fostering the creation of a dedicated AHB to source accommodation or that an existing AHB is encouraged to pivot completely to focus on this area. The benefit of the latter is that expertise is retained and ready.
- Consider approaching the [Housing Alliance](#) of AHBs with a view to a pilot taking place.
- Taking into account that there are 300 plus AHBs across Ireland, smaller AHBs should be considered in any strategy that engages AHBs as they have more agility and better local connections to facilitate delivery of housing.

Model 3: State Build discussion and recommendations

- 11.8 Nearly all stakeholders commented on the importance of the state committing to building accommodation, both for people in the protection process and as part of its wider housing policy. As noted in Section 20, protection accommodation is dependent on success, or failure, of wider supply and policy. Stakeholders cautioned relying on, particularly, in the short term, on built accommodation: our projections reflect this and estimate only 5% of protection accommodation will be State built by the end of 2022. In addition, to delay there was some concerns about the location of the State built accommodation and the dangers of people being segregated from the rest of society. Nevertheless, it remains a crucial stream.
- 11.9 Further to the importance of committing to State built accommodation there is a needed for protection accommodation to be embedded into wider housing policy programmes. This includes embedding in the Land Development Agency's mandate, as was recommended by the Advisory Group. Of note is that protection accommodation is not mentioned in Rebuilding Ireland.

- 11.10 As long as protection accommodation policy remains isolated and apart from mainstream planning it is likely to be defective. However, as noted below at Section 20, until wider housing policy and supply does begin to meet demand, we recommend ringfencing protection accommodation and policy given the particular needs of protection applicants.

Recommendations and considerations:

- State built housing is a key stream in the overall plan to end Direct Provision. While possibly slow to deliver it is the most ambitious and delivers most. It is particularly relevant in the context of reception centres.
- It is notable that DHLGH recommended state build accommodation in their observations on the Advisory Group report.
- The quality and location of State land will be crucial. It is important that State land is procured and made available and that it is not substandard.
- The Land Development Agency mandate, as recommended by the Advisory Group, should be amended to include acquiring and developing accommodation, including reception centre accommodation.

Model 4: Policies to increase and facilitate Independence

- 11.11 As noted above this is not strictly speaking an accommodation ‘model’ in itself but a policy approach aimed at increasing people’s independence. There are fundamental barriers to people in the protection process integrating in to Irish life. These should be removed. There should also be increased flexibility on where someone coming through the process can live and decisions made on piloting self-help place finding schemes within the exiting Direct Provision system. In this report we describe the role of a new assessment and support service in the Reception Centres. This would include helping people to source their own accommodation whilst their application for protection is being assessed. We feel that a self-help accommodation solution if properly structured and supported could deliver a reasonable percentage of the accommodation required although this is unlikely to be a large-scale solution.
- 11.12 We believe there is more potential for people finding their own Stage Two accommodation solution through moving into accommodation with family and friends or sourcing their own private rented accommodation. For this to be successful people will need to be able to sustain their accommodation costs including contributing to the costs of being accommodated by family and friends.

Recommendations and considerations:

- Implementing the Advisory Group proposals on expanding the right to work, bank accounts and driver licences should be implemented without delay. Without these and other changes, a self-help accommodation solution is likely to continue to play a small part in meeting the overall accommodation numbers required.

Model 5: Private Company delivery or social enterprise

11.13 This is a broad stream of accommodation that could involve similar types of accommodation but delivered via different types of entities. This could include a large landlord style private company the other via a social enterprise company that diverts profits back into its work. Encouraging the involvement of social enterprises should result in a larger variety of accommodation providers and may also mitigate concerns about 'for profit' companies. A benefit of this model is that the company can independently raise capital and funding and may have accommodation ready to go, thereby reducing lead in time.

Recommendations and considerations:

- Only one known organisation is pursuing this model but it has not yet been commissioned by Government. It has stock in hand and the resources to grow. Others may emerge.
- Rigorous implementation of standards, inspection and enforcement may mitigate concerns about a for profit approach. This could include requiring providers to demonstrate investment in staff training. Plus requirement that there is an annual allocation for capital investment so that facilities are maintained.
- A rolling tender process could also be initiated: accommodation proposals could be submitted that could be considered and, if approved, commissioned. This would allow Government a rolling source of accommodation. The Department of Health used a similar open framework for disability accommodation.

Model 6 and 7: Local authority delivery through the private rented sector using a Homeless Housing Assistance Payment style payment

11.14 Models 6 and 7 are linked. Model 6, as recommended by the Advisory Group involves local authorities being responsible for the delivery of accommodation in a variety of ways, but that private accommodation is likely to be the main model of accommodation due to insufficient

supply elsewhere. Model 7 would simply merge protection accommodation policy with mainstream housing policy with the vast majority of accommodation being delivered using the private rented sector using the Housing Assistance Payment or a similar type of payment.

- 11.15 Accessing the private rented sector will inevitably play a significant part in meeting the accommodation numbers required. Generally, there was support amongst stakeholders for this being part of the recommended mix of solutions. There were concerns expressed by some regarding costs and the need to require a framework to guarantee housing standards. We accept that using HAP is not the long-term solution. It increases costs for the State, drives up rents, and does not increase supply. Stakeholders also raised concerns about whether private rented accommodation would be suitable for vulnerable people. This is reflected in the Advisory Group recommendations.
- 11.16 However, in order to end Direct Provision quickly, accessing the private rented sector in the numbers required using the subsidy provided through HAP or a similar style payment is a pragmatic and realistic solution whilst new build and other solutions are pursued.
- 11.17 There was feedback from stakeholders on whether HAP should be set at the higher levels available through Homeless HAP. We think the level needed will depend on the local market costs and pressures. Under the current rules HAP cannot be accessed unless a person has residency status. There would, therefore, need to be changes to the regulations to enable this option to be feasible.
- 11.18 An advantage of using the private rented sector is that a person could possibly remain in their accommodation if they receive a successful outcome to their application for protection. In the UK for the first two of the five-year commissioning rounds local authorities provided hard to let social housing as dispersal accommodation under contract. Much of the social housing was used for families and not for single people. The advantage to this approach was that if the application for protection was successful, a significant number of households were able to stay in the property as the local authority were able to grant a secure tenancy on the property occupied. This did mean however that the local authority had to replace that unit with another unit to meet the contract requirements.
- 11.19 However, this is not to say that a local authority cannot use social housing stock or convert other buildings in their ownership to provide some accommodation. It is still likely to be the case that a small number of local authorities may have harder to let units that could be used. However, these would need to be suitable and meet the criteria set out in this report in respect to location and not being in isolated areas.

- 11.20 For the model to work local authorities and the Department for Housing, Local Government and Heritage must play an active part alongside other partners to deliver the programme needed. There will need to be sufficient funding allocated to support the programme without creating pressure on local authorities existing budgets.

Recommendations and considerations:

- The private rented sector could be particularly suitable for people who are less vulnerable and feel able to live independently within the community.
- A significant advantage is that a person may be able to retain their tenancy if they receive status.
- Covid-19 has possibly changed the availability of accommodation, but it is unclear if this will persist.

Model 8: Private leasing

- 11.21 If the private rented sector is used, a more structured and “at-scale” approach to accessing accommodation could be used. Private sector leasing schemes through individual local authorities, AHBs or charities could be encouraged. We heard of a number of examples of successful leasing schemes targeted at the homeless and best practice should be used as the basis of establishing leasing as the main route for accessing the number of private rented sector units required.
- 11.22 We are aware of three examples (Galway and Ballinamore and, in November 2020, Letterkenny) where larger scale leasing schemes have been used. While these are positive initiatives, and stakeholders referenced improvement from other Direct Provision sites, concerns remain about the suitability of pursuing this option, in a worst-case scenario that it could be similar to Direct Provision. Stakeholders interviewed had significant concerns about value for money and costs.

Recommendations and considerations:

- Examples of block leasing in Galway and Ballinamore could possibly be replicated going forward, particularly in the short term. Care will be needed to ensure these are not Direct Provision ‘light’.

12 Overall responsibility for Protection Accommodation

- 12.1 We propose a new governance structure for the management of protection accommodation. This structure consists of overall responsibility resting with one government department. We recommend that this is Department for Children, Equality, Disability, Integration and Youth (DCEDIY). The department is headed by a Minister who has publicly demonstrated a strong commitment to ending direct provision and implementing a suitable new model. The Minister therefore has the drive required to promote and deliver the new model and to act as a co-ordinating figure at Ministerial level across Government. Ultimately however, this is a housing issue that requires a housing solution, therefore in the longer term we recommend that responsibility is located within the Department of Housing. This should occur when there is evidence that the new model is working and various indicators are being met, and also when the Department of Housing Local Government and Heritage are demonstrably committed to ensuring the new model continues to work.
- 12.2 The department's responsibility will be to co-ordinate a cross-departmental body consisting of an operational group of officials, reporting to a Board of Directors, consisting of senior officials from all the relevant departments. The Board should in turn report to the Cabinet Committee, the creation of which the Advisory Group recommended. We recommend that one government department has responsibility for implementation. Without better co-ordination there is a significant risk of fragmentation.
- 12.3 Currently the Department of Justice (DOJ) has the decision-making responsibility for applications for international protection. DCEDIY was given, in October 2020, responsibility for Direct Provision accommodation. The Department for Housing, Local Government and Heritage (DHLGH) has responsibility for housing if and when a person gets status in Ireland. There are competing priorities and agendas for each of these Departments. A worst-case scenario is that the DCEDIY can neither control processing times or wider housing policy. Concerns have been expressed through our consultations with stakeholders about the level of commitment demonstrated by some senior officials and some politicians across all departments. This has to change if the new model is to be successful.
- 12.4 The lead responsibility for delivering the new model and ensuring it works cannot rest solely with the Minister for Children. Reflecting the Advisory Group's recommendations, there is a need for a cross-departmental body tasked with overseeing the implementation of the new model and overcoming challenges relevant to each Department's responsibilities. This body is an essential first step and will help to deliver Departmental 'buy in' which many stakeholders believe to be absent in the current system.

- 12.5 As recommended by the Advisory Group this Cabinet committee should consist of representatives from various departments. The work programme of the cross-departmental body should be co-ordinated and underpinned by legislation which sets out the respective roles and responsibilities of each Department.
- 12.6 The Terms of Reference for this body need to be very clear in setting out the responsibilities of each department in delivering the new accommodation model. The terms should also set out the interdependencies between Departments. For example, the role of the Department of Justice in speeding up the decision making process and the impact this will have on the number of housing units required.
- 12.7 At the local delivery level, we recommend the creation of nine new regional accommodation commissioning bodies which are established each responsible for agreeing targets for delivery and reporting to and being directly accountable to the DCEDIY.

13 Control and commissioning of accommodation

- 13.1 We do not support the Advisory Group recommendation to mandate local authorities to source suitable housing. In our opinion, the model will not work if imposed on local authorities. If local authorities are to be used, the solution must be based on partnership. If not, it may produce resentment, non-co-operation and a view that responsibility and costs have been dumped onto local government. The solution instead should be a local authority-led model, not imposed through legislation (although legislation could be a back stop for those authorities that do not co-operate). This is the only way to achieve the 'buy in' from local authorities that is required for an alternative model to direct provision to be successful. A charter style agreement between central government and local authorities may assist in building a partnership approach. This approach has been used recently in relation to climate change in Ireland.
- 13.2 Mandating local authorities should be considered as a last resort. The legal power to mandate local authorities should be adopted as part of any new legislation regarding the system for delivering international protection. This power should however be kept in reserve and used where there is clear evidence that an individual local authority is deliberately failing to engage.
- 13.3 While we propose that Reception Centre Accommodation should be state owned, we recommend that when models of accommodation are delivering, Stage Two accommodation should begin to be commissioned through new bodies that we have called 'Accommodation Committees'. We recommend that they are led by the local authorities in the region and

are directly accountable to the Government Department responsible for international protection accommodation. We have recommended that the allocation and the process of matching individuals and families to accommodation should be carried out locally through the operational arm of the Accommodation Committees. The Committees should be created when sufficient numbers of new accommodation units are being delivered by the models identified in section 9.

- 13.4 The Accommodation Committees role would be to act on behalf of Government to commission the accommodation required for people applying for international protection. We do not envisage a role for the Accommodation Committees in commissioning Reception Centre accommodation. However, given our recommendation that these be located across the country, they should be consulted on the delivery of these units.
- 13.5 The Accommodation Committees would have delegated authority to develop and deliver an accommodation-commissioning plan appropriate to the needs of their local authorities and region. Contracts would be signed off by the responsible Government Department, but the Accommodation Committees would be responsible for overseeing the delivery of the contracts commissioned.
- 13.6 We have considered whether the Accommodation Committees should operate at an individual local authority level or a regional level. At local authority level the Accommodation Committees could be set up across all 31 local authority areas in Ireland. Where there are several smaller local authorities within a region a regional or sub- regional Accommodation Committees should be set up consisting of several local authorities. Where there are both county and city authorities in a larger urban centre only one would be required. Accommodation Committees could also be split across the nine regions used for homelessness reporting.
- 13.7 There were considerable discussions with stakeholders as to whether the Accommodation Committees we propose should fit into existing structures. The Local Community Development Committees (LCDCs) were suggested as they are already set up to bring together organisations to deliver various strategies and have sub-committees to deliver on specific projects. The LCDCs can lead on local community development and have considerable resources behind them in addressing social inclusion, local development and the social economy. In addition they are underpinned by the public participation networks and older peoples' councils in each local authority area. They could be a critical hub for integration.
- 13.8 We understand the points made by several stakeholders that if there is an existing structure that Committees can fit into this will avoid an extra layer of bureaucracy. We do not have a

firm view as to whether the Accommodation Committees should 'stand-alone' or be part of an existing structure, regionally or at local authority level. Our clear recommendation, however, is that the Accommodation Committees should be focused on housing. If their remit becomes too broad and they are incorporated into existing structures with wider agendas, then there is a risk that the accommodation focus will be lost. Although the focus of the Accommodation Committees should be on housing, there is a persuasive argument that their remit should include commissioning on behalf of Government of support and wrap around services.

13.9 We recommend that the Accommodation Committees should be made up of:

- The local authority or group of local authorities including representatives from housing, social care and education;
- People with direct experience of the protection process;
- Approved Housing Bodies including representatives of larger national bodies and smaller locally based AHBs;
- Faith Groups;
- Health and Education services;
- Non-Government Organisations/Charities
- Any other body that the Accommodation Committee decides locally it would be appropriate to include.

Each Accommodation Committee would be tasked with developing an accommodation commissioning plan that is appropriate and reflects the housing market for the local authority, or region and the quotas for provision agreed.

13.10 There would be staffing and administrative costs including servicing the Accommodation Committees; commissioning and procurement costs; monitoring and coordinating contracts. These costs should be met directly by Government through grant funding to the local authority or the local authorities within a regional consortium. It is envisaged that there would be guidelines or cost limits set by Government for the commissioning plan. Each commissioning plan submitted by the Accommodation Committees to Government would need to be fully costed. Costs would include both capital and revenue.

- 13.11 The accommodation that the Accommodation Committees would seek to commission on behalf of Government could be based on the various models based above. There would need to be a clear delivery plan and a clear delivery timetable that met the Government's timetable for delivering a new model to end Direct Provision. There should be a time period for the commissioning plan, four years may be a sensible timescale to adopt. We do however recommend that some targets are set to begin the transition to the new system in 2021 to provide some momentum.
- 13.12 Although inevitably there would need to be cost limits to ensure accommodation is delivered within the overall budget set by Government there should still be some allowance for local flexibility. For example, an Accommodation Committee that could evidence that they could deliver a higher percentage of accommodation through new build, purchase or acquisition should not be financially penalised if this proposal cost more than an Accommodation Committees that could deliver a high percentage of units through a Community based supported lodgings approach.

14 Quotas for Regions Or Local Authorities

- 14.1 We examined whether quotas should be set for each local authority and the issues involved in doing so. Evidence from England is that where the Home Office set private sector contractors quotas for each local authority area, with minimal consultation with those authorities, it has led to anger and reduced co-operation with the Home Office, even where a local authority is supportive of accommodating asylum seekers within their area.
- 14.2 In contrast, the success of the Syrian Resettlement Scheme in the UK and possibly also in Ireland, demonstrates that a more consultative and inclusive approach can work. The Syrian programme was founded on an honest discussion about capacity and costs that in turn delivered a very high level of engagement and commitment to help.
- 14.3 We have not reached a firm conclusion as to whether quotas should be set at a regional level or individual local authority level. There is a view from some stakeholders that several local authorities are too small to provide suitable accommodation. However, we are concerned that if set at a regional level there is the risk that some local authorities within a region will choose not to contribute or participate in the programme, thereby undermining the entire model.
- 14.4 Decisions on quotas should look to fit in with existing arrangements. The 2000 Planning Act gives local authorities a responsibility to complete housing needs assessments and to have a Housing Strategy. Decisions on quotas should take account of the needs assessments set

out in the local Housing Strategy. Although we have not reached a conclusion, we have set out the issues that we think should be considered in reaching a decision on quotas. These are set out below.

- 14.5 To obtain support and 'buy in' from local authorities and communities the accommodation distribution must be seen to be fair and equitable regardless of high accommodation costs in certain locations. The system must be seen to be fair so that local authorities and host communities are welcoming and not resentful. Therefore, we feel it is essential that there is a demographically based equitable distribution of accommodation. This matrix should also consider availability of essential services such as health, education, transport, and employment prospects.
- 14.6 Consultation with stakeholders raised concerns that the evidence is of some local authorities deliberately failing to engage with the process of accommodating or supporting current and former applicants for international protection. Wider feedback received by the Irish Refugee Council and flagged by some stakeholders has raised the example of local authorities' inability to provide accommodation to people in the Traveller community. Therefore, we recommend that the legal power to require local authorities to engage is retained, but only to exercise that requirement where there is evidence of deliberate non-cooperation.
- 14.7 Negotiations regarding the quota could be based on the principle that every region should seek to agree a core number to be accommodated. This could be up to 70% of the numbers required based on a fair and equitable formula including population weighting. A decision on the remaining 30% would be made following negotiations taking into account factors such as local housing and homelessness pressures, the availability of move on accommodation through the local authority housing lists, general accommodation availability, costs of accommodation, support available, and availability of education places for families. Costs may be a factor, but this should not be a policy led by the availability of lower cost accommodation as this model has been widely criticised in the UK and elsewhere. For example, for one local authority area where the quota is agreed as 70% 'core' plus 15% based on agreements regarding the level of local housing pressures and availability of support services. In another local authority area, the final agreed figure might be based on 70% core plus an additional 35% based on agreement regarding their local pressures and services available.
- 14.8 Stakeholders and the people we consulted through the lived experience focus groups were keen to ensure that decisions on quotas and accommodation considered locations where there are already existing refugee and ethnic minority populations and supporting infrastructure including where existing community groups are already established. We support

their view. However, this should not be counter to our central recommendation of ensuring a sensible geographic spread of applicants across Ireland and taking steps to mitigate the risk of isolation and disconnection from existing communities.

15 Commissioning and Procurement Responsibilities

- 15.1 We have set out in this report ideas and recommendations on an accommodation pathway model from Stage One reception accommodation to Stage Two accommodation and move on. It is important to clarify who we think should be responsible for commissioning decisions at each stage of the pathway.
- 15.2 For Reception Centres, decisions on building and commissioning these should remain with the Government. As Reception Centres would be more evenly distributed across Ireland, local authorities should be closely involved in the commissioning of those centres through the Accommodation Committees.
- 15.3 For Stage Two accommodation, whilst claims for international protection are assessed, accommodation should be commissioned by the Accommodation Committees with an accommodation-commissioning plan approved by the Government. Contracts would have to be signed off by the Government. Delivering and monitoring the contracts would be devolved to the Accommodation Committees and funding would be required to deliver the contract monitoring requirements on behalf of Government. We have assumed that that applicants who are refused will be expected to remain in their accommodation until removal (or successful appeal) rather than having to move into some form of Reception Accommodation whilst they appeal or (if they have exhausted the appeal system) until they are removed. We do not envisage that the Accommodation Committees would have a role in commissioning move on accommodation, and that once granted status people should be accommodated through mainstream processes available to any Irish person. We do, however, believe that Accommodation Committees have an important role in delivering successful move on and integration and that role needs to be adequately funded by Government.

Commissioning of Supported Accommodation

- 15.4 A percentage of people claiming protection would require supported accommodation or additional support to address issues such as mental health issues, trauma and domestic abuse. There is the option to leave the commissioning of special needs accommodation to the Accommodation Committees although there are some practical issues that would need to be overcome to avoid duplication of existing services addressing these issues or oversupply or undersupply of required support.

- 15.5 There is a case for commissioning this support and specialist supported housing centrally. This could be done through large scale AHB or consortium of large scale AHBs or the creation of a new body, as mentioned above. While larger AHBs are able to bring considerable capacity, smaller AHBs should also be encouraged to become involved. There are currently over 540 AHBs across Ireland. Drawing in the experience and interest of smaller AHBs will assist in integration and community cohesion. It also remains possible that they would be able to commission suitable third sector providers or private sector providers to deliver the number of units required. We do not have a firm view on how special needs supported accommodation should be commissioned but if commissioned nationally decisions on numbers and needs regionally should be set or informed by the Accommodation Committees.

The Commissioning Process and Competitive Tendering

- 15.6 The process adopted for commissioning accommodation is crucial to the success of the new model. The experience in the UK of open competition with tenders heavily weighted on price has produced a system widely criticised by local authorities, stakeholders, service users and the National Audit Office for providing poor value for money. The quality of some of the accommodation has been heavily criticized by service users and in a number of national reports.
- 15.7 The commissioning process adopted in the UK does not deliver an even geographical spread across the country. The location of accommodation is largely in the north of England in the North West, Yorkshire, and North East regions and in lower rental value private sector properties. Nor is there an even distribution across the four Countries of the UK and accommodation commissioning is not a devolved power. It is centralised and remains the responsibility of the UK Border Agency (UKBA). There is a large accommodation contract in Scotland using ex-Council accommodation owned by Housing Associations, a smaller contract for Wales concentrated on the Urban Centres of Cardiff, Newport and Swansea and a small contract in Northern Ireland.
- 15.8 The contracts for the North of England and Glasgow deliver accommodation almost exclusively in local authority areas with high levels of deprivation. There are very few local authorities or Registered Housing Associations that now hold accommodation contracts or deliver accommodation through sub-contracts. There are very few specialist supported housing schemes meaning many of the most vulnerable individuals and families are accommodated in mainstream dispersal accommodation.
- 15.9 The mistakes in the UK date back to the first round of commissioning in 2000. The Home Office required an open competitive tender with the scoring system structured so that

the price had a disproportionate higher weighting than the quality and location of the accommodation. There was no requirement for contracts to be delivered regionally based on relative population levels or any formula that took account of social economic factors and levels of deprivation. Having got it wrong for the first round of commissioning in 2000 the UK Government has not been able to make significant changes when contract have expired and been retendered.

- 15.10 We strongly recommend that the Irish Government examines the evidence and lessons from the UK commissioning of contracts for a national dispersal system and structure the commissioning process to avoid making the same mistakes.
- 15.11 Public procurement is regulated under EU rules therefore there has to be open competition. We believe however that the procurement framework should be structured within the EU rules to deliver good quality accommodation that is focused on the needs of those seeking international protection and meets the regional distribution quotas agreed between the Government and local authorities.
- 15.12 This will mean tenders should be weighted for quality over price though that does not mean there would be a 'blank cheque' approach. Contracts would still have to demonstrate value for money within the financial thresholds set by the Government for each Accommodation Committees and ultimately it would be the Government that has to sign off the contracts awarded.
- 15.13 Although economies of scale should still guide the process, the size, length and number of contracts per region/local authority area should be set by the Accommodation Committees and submitted through the a Commissioning and Delivery Plan for approval by Government. Obviously flexibility will be crucial and, for example, plans should be allowed for accommodation of less than 50 people (as recent procurement has required). This would provide an opportunity for smaller community-based schemes delivered by charities or smaller AHBs or a partnership between to be delivered.
- 15.14 Accommodation procurement decisions should not be based on the availability of vacant housing alone which is more likely to be located in areas of economic deprivation especially in rural communities with limited infrastructure and support services. Accommodation procured should not be in isolated locations replicating the problems regarding the location of some existing Direct Provision. Accommodation should be in or within reach of towns and larger urban settlements with good transport links.

16 Responsibility, control and delivery: mapping the new system

Government Department responsible	Cabinet Committee (as recommended by the Advisory Group)	Independent Monitoring body (as recommended by the Advisory Group)	Programme Management Office	Regional Accommodation Committees
<ul style="list-style-type: none"> — The Department for Children, Disability, Equality, Integration and Youth — Shifting to Department of Housing, Local Government and Heritage in the long term and when models are delivering and indicators met 	<ul style="list-style-type: none"> — Comprising all Government Ministers with responsibility for delivering the new system — Including monitoring in respect of deadlines, acting upon early warnings if problems or if backlogs occur — Clearing house to resolve inter departmental issues which arise between Departments — To be created in 2021 	<ul style="list-style-type: none"> — To ensure transparency and accountability — Civil society and representatives of applicants in the protection system — Evaluate the functioning of the system and identifying blockages and areas where change is needed — Annual Report to Oireachtas — To be created in 2021 	<ul style="list-style-type: none"> — Delegated authority for developing commissioning and developing new accommodation models — Reporting to DCDEIY — To be created in 2021 	<ul style="list-style-type: none"> — Recommended nine Accommodation Committees (Dublin, Mid-East, Midlands, Mid-West, North-East, North-West, South-East, South-West, West.) — Role to commission all next steps accommodation in line with agreed targets and to report to and be accountable for delivery to the Programme Management Office and Department for Children, Disability, Equality, Integration and Youth — Created when accommodation models are delivering sufficient numbers of units

17 Stage Three Accommodation

- 17.1 We believe that if the recommendations in this report are adopted the result will be that international protection applicants are accommodated in good quality accommodation across Ireland and feel welcomed, supported and settled in the area where they have been accommodated.
- 17.2 When a person receives a positive decision on their claim for protection, the process and structures developed through the accommodation pathway model can enable a successful transition, settlement, and integration. We are also of the view that this will result in people feeling settled in the area where they had been accommodated and wish to remain in that area. This may reduce the drift back to Dublin that some commentators believe is a consequence of the current system
- 17.3 The system for supporting people to move out of accommodation into alternative accommodation should be extended and funded and come under the coordinating role of the Accommodation Committees. This work is currently delivered by a mix of both the International Protection Accommodation Services and NGOs including DePaul, the Peter McVerry Trust and the Irish Refugee Council.
- 17.4 Our view is that resettlement support should be available to all successful applicants for protection. This should be available for up to 6 months depending on need, as recommended by the Advisory Group. This resettlement support should be co-ordinated and commissioned through the Accommodation Committees.
- 17.5 A key objective of the move on and resettlement process is that people should not have to become homeless to receive help. This increases pressures on local authority homelessness services, which we know are already under stress. Our expectation is that there will only be limited opportunity for applicants to remain in their accommodation if they receive a positive decision on their application for protection. Planned moves from Stage Two accommodation should therefore be the aim. This will require a decision to grant a longer period in accommodation once status is granted to provide the time required for resettlement workers to support the person to seek alternative accommodation. If people do remain in accommodation this may reduce the number of units available to new cases and significantly increase costs of creating new accommodation and require constant sourcing of accommodation. We do however, see more scope for people to remain in their accommodation where delivered by private rented accommodation through and possibly by any community initiatives.

- 17.6 It is important that the legislation is clarified to ensure that applicants for protection are accommodated under a license whilst their application is considered and that, if they are not granted a tenancy when moving to Stage Two accommodation, they remain under a license during any extended 3 month period in the accommodation whilst resettlement and planned move on support is attempted.

Move On and Social Housing

- 17.7 The expectation is that if the new accommodation pathway works many more people granted protection will choose to remain in the location where they were accommodated whilst their application was being assessed. This will reduce pressure on housing lists in Dublin and other areas of high housing demand and stress. We accept that there is a national problem of increased homelessness and large number of households on housing lists across Ireland. However, it is still likely to be the case that the housing pressures in some areas are less than others.
- 17.8 It is accepted that not all successful applicants for protection will be able to access social housing through a local authority or an AHB and that is also the case for households who are homeless or who are currently on local authority lists. However, social housing will be a solution for some and once protection status has been granted people will have the same rights as any other Irish Citizen to access this.
- 17.11 Consideration should be given to allowing a protection applicant to apply to the housing list for the area where the person is accommodated to be made three months before an expected decision on a person's application for protection. This would allow their application for housing to go through the administrative process and their housing need to be assessed. However, they would not be able to be considered for accommodation unless their application for protection was successful.
- 17.12 Consideration should also be given to whether a local authority should include successful applicants for protection as a priority group under their allocation scheme which would boost their chances of being helped within the three-month period. We believe that any decision on awarding priority status should remain a decision for local authorities and not be imposed by Government given there may be community and political considerations.
- 17.13 It should be noted however, that if a local authority grants priority status on their housing list for people who are homeless or threatened with homelessness then successful applicants for protection should be considered anyway under that category of housing need. There is an

argument that it would be perverse if a successful applicant for protection had to wait until they were physically homeless in order to receive priority status. Planned moves to prevent homelessness should remain as a core objective for any decision on changes to priority status for a local authority housing list in the same way as planning or preventing homelessness would be a core objective for any strategy to prevent homelessness for residents in housing need or in crisis and who are not applicants for protection.

- 17.14 The reality of the housing market is that social housing will not be a solution for all successful applicants. We reject the DHPLG statement, contained in their observations on the Advisory Group report, that “any expectation of there being sufficient private rental accommodation available to make this proposal viable to be most unrealistic, especially given the numbers already eligible for HAP from other cohorts and given that it is expected that HAP will support an additional 15,000 households in 2021.” The total number of private rented sector households in Ireland had until recently risen significantly and stands at 299,726 tenancies. It appears that private rented capacity has decreased slightly in the last 12 months. It is too soon to see if this is likely to be an on-going downwards trend, however private rented accommodation has an important part to play in the accommodation options available. There needs to be new schemes developed to access the private rented sector in the numbers required for Stage Two accommodation and move on once status is granted.

18 Ending Direct Provision and Transition To The New System

- 18.1 There will be a period of transition from the current system of Direct Provision to the new streams of accommodation. The logistics of achieving this transition will need to be scoped and plans for moving people from Direct Provision to the accommodation proposed in the new model need to be established. Ideally however, if processing times are reduced and the case processing scheme recommended by the Advisory Group implemented, people will be leaving Direct Provision permanently, as opposed to moving across to a new system. We also recommend that new protection applicants begin to be accommodated directly in the new system in 2021.
- 18.2 Where new Reception Centres need to be built or bought and refurbished this should not delay implementing the new model as the new provision of Stage Two accommodation could be bought on stream to replace the current contracts as they expire. The accommodation commissioning and delivery plan and timescale for each Accommodation Committee will be critical to this transition process. An Accommodation Committee that decides that a fair

percentage of its accommodation will be delivered through new build will require a longer lead-in time than one that looks to commission through the private rented sector. For this reason, we are recommending a balanced proportion of new build and use of existing sources of accommodation. The decommissioning of existing units should however be matched to the rate at which the new supply of Stage Two accommodation comes on stream through commissioning at Accommodation Committees level.

18.3 We recommend four approaches to winding down Direct Provision:

- Focussing on closing centres that are of most concern and that don't meet the [National Standards](#) for accommodation offered to people in the protection process.
- Ending the use of emergency accommodation.
- Non-renewal of Direct Provision centre contracts that expire.
- A target of mid-2021 should be set for new protection applicants to enter the new system and new types of accommodation.

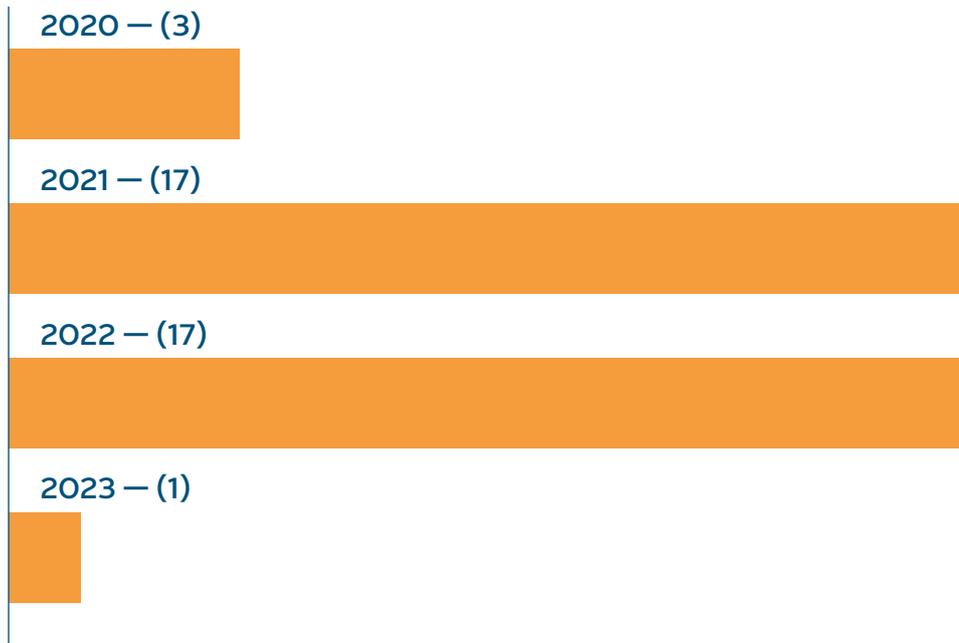
18.4 Centres of concern: this transition approach uses the decommissioning of those units of Direct Provision that are the least fit for purpose in terms of location, safety and quality and that don't meet the National Standards. The closure of hotels in Caherciveen and Milton Malbay demonstrate that a proactive policy of closing the most inappropriate facilities can be taken.

18.5 Ending emergency accommodation: this approach would close all emergency accommodation. As of October 2020, there are approximately 1,204 people accommodated in approximately 32 temporary and emergency accommodations. Emergency accommodation has been widely [criticised](#) as being particularly inappropriate.

18.6 Direct Provision centre contract expiry: Appendix 4 contains a list of Direct Provision centre and emergency centre contract expiry dates. The table below gives a summary of year of expiry of contract. We recommend a strategic approach where contracts are not renewed. In addition, and if necessary, warnings should be created to flag that a centre contract is expiring and is not automatically renewed.

Number of Contracts Expiring

Direct Provision



Emergency Centre



19 Costs and Value for Money

- 19.1 We have prepared costings, however, as noted above they are not included in this report due to the complexity involved in 8 different models. Assumptions around costings should include:
- A need for 1,500 units of Reception Centre accommodation, configured in schemes of between 50 and 100 units each, resulting in the need for 20 Reception Units, dispersed across the country according to the five cities in the National Planning Framework. These to provide a maximum stay of three months, and the configured as own room door and shower facilities accommodation with communal cooking and other areas. Provision to be modelled on 57% available for single people and 43% for families with children.
 - A requirement to facilitate a maximum stay of three months (with some room for slippage) in Reception Centres results in the need for 3,000 units of Stage Two accommodation to be provided on a three year cycle.
 - Stage Two accommodation to be delivered through a variety of models, as mentioned above.
 - An assumption that individuals and families would stay in their Stage Two accommodation for up to three months after being granted status to facilitate their planned move into longer term move on accommodation and avoid homelessness.
- 19.2 Our modelling covers both capital costs for acquiring and maintaining a suitable mix and standard of accommodation in both Reception Centres and Stage Two accommodation, and revenue costs associated with supporting the annual cohort as they pass through the various stages of the application process.
- 19.3 Modelling has been made on a four-year cycle to fully reflect likely costs, with a need to deliver additional Stage Two accommodation every fourth year as each cohort moves through.

Capital Costs

- 19.4 For the delivery of 20 new Reception Centres we have assumed that 10 would be new build and 10 acquired from existing 'off the shelf' sources (either existing fit for purpose Direct Provision or other housing market sources). Modelling on this basis requires €117m over the four-year cycle, with the majority of this (€94m) being a one-off capital cost (for purchase and acquisition).

19.5 For the delivery of 3,000 units of Stage Two accommodation, we have assumed that capital cost will only apply for the delivery of new build social housing and purchase of existing empty property, with the other three types modelled only incurring ongoing revenue cost. The total of capital cost modelled over the four-year cycle is €216m, thus bringing the total Reception Centre and Stage Two capital costs over a four-year cycle to €343m.

20 Risks and mitigation

20.1 There are several risks to adopting the model we propose, the framework for its implementation and the wider commitment to end Direct Provision. We believe that it is important to identify these risks and set out possible responses and mitigation measures. We have set out below what we believe to be the top 20 risks and responses. The risks are centred around political inaction, short to medium term spend increases and

RISK	MITIGATION
<p>1. Political Drive</p> <p>There is a lack of drive to change the existing system on the part of Central Government and local authorities resulting in little or no change.</p>	<ul style="list-style-type: none"> — Reiteration of the Programme for Government commitment, along with the wide range of criticism of the existing system should mean there is no possibility of renegeing on the goal of ending Direct Provision. — Ireland can be a leader in developing a new system reflecting the EU's Action plan on Integration and Inclusion 2021-2027 and its emphasis on promoting models of autonomous housing (rather than collective housing) for protection applicants, especially families, and disseminate and scale up successful innovative models of inclusive and affordable housing for beneficiaries of international protection. — White Paper should set out 'landmark' targets to identify which Direct Provision units should be prioritised for decommissioning, to implement the proposed Governance structure, and to commit a budget to facilitating the changes.

RISK	MITIGATION
	<ul style="list-style-type: none"> — Central Government will need to show its commitment to the governance arrangements.
<p>2. A change in minister/ government during this transition process. This results in changed political and spending priorities before the benefits of the new model are visible.</p>	<ul style="list-style-type: none"> — Buy-in from all government departments to deliver the complete transition to the new funding model is sought. — Where possible, consider writing commitments into legislation. — Reiteration of a long line of reports and commentary outlining need for change and ending Direct Provision: Oireachtas Justice Committee, IHREC, UN CERD Committee
<p>3. Covid-19 recession and the impact of Covid 19 on the Irish economy and housing market resulting in no funds available to implement and properly fund the new system on an on-going basis</p>	<ul style="list-style-type: none"> — There is a legal requirement to provide protection and a humane process for those seeking protection, the current system is costly and unplanned. — A business case setting out the value for money derived from a new system in the longer term and a robust ‘spend to save’ case exists and should guide the process going forward.
<p>4. DHLGH and local authority resistance: local authorities and the DHLPG are not committed to supporting implementation of the new system.</p>	<ul style="list-style-type: none"> — The Governance Framework and the recommended regionalised approach through the Accommodation Committees provides the opportunity to spread implementation of the new model across a number of stakeholders. — Emphasise the evidence-base on which allocations will be made, and the role of the local authorities within the decision-making body at regional level.

RISK	MITIGATION
	<ul style="list-style-type: none"> — Government retains powers of enforcement, but ethos of this report is that local authorities will welcome new arrivals to help support local facilities (schools etc) and meet any requirements under the national planning framework etc.
<p>5. Failure to reduce delays, introduce the case processing scheme and not implementing other Advisory Group recommendations means protection process remains backlogged</p>	<ul style="list-style-type: none"> — The swift implementation of the recommendations of the Advisory Group are crucial, in particular around reducing processing times and the ‘case processing’ recommendation so that as few people as possible are brought across from the old system to the new. — Approximately 2,895 people could benefit from the case processing recommendation. There are other groups of people in the current system who can be assisted to move on for example cases stacked behind Dublin III Regulation litigation. — Creating a new system with no starting population is a completely different, and much easier, proposition than a new system that begins with the approximately 7,000 people. — The Advisory Report was clear and emphatic in stating that a whole system approach is needed and that failure to address one dysfunctional element of the system could have a knock-on effect on other parts of the system. — Lock in commitments from Departments responsible and allocate additional resources needed to reduce waiting times. Covid-19 has already increased waiting times at both the International Protection Office and the International Protection Appeals Tribunal.

RISK	MITIGATION
<p>6. Increase in number of people seeking protection: numbers exceed those planned for in the new system, requiring additional spend on costly emergency housing in addition to the costs of the new system</p>	<ul style="list-style-type: none"> — The Advisory Group report gave a calculated methodology for estimating 3,500 applications per year. — A focus on speeding up the existing system for reviewing applications and settling applications, as well as the full implementation of the pathway model as proposed will improve capacity in the system. — Our approach also emphasises self-reliance and choice and removes disincentives for people to find their own housing solutions that exist in the current system.
<p>7. New system does not include the geographic spread and the ethos of choice and self-reliance required for it to work recreates the problems of the existing system</p>	<ul style="list-style-type: none"> — The new model will need to be launched with the new ethos front and centre of any public statements made about it. Staff will also need to be trained to deliver the service within the ethos.
<p>8. Local Communities and the public do not support or are actively hostile to the new model and approach.</p>	<ul style="list-style-type: none"> — Benefits of the community model are well communicated and communities are included as early as possible. New model also brings communities into the process as active participants and leaders. The regional approach also provides an opportunity to improve the viability of some community infrastructures like schools, health services, transport and bring in employment. — Central to our thesis is inverting the dynamic from ‘top down’ to ‘bottom up’. Neither will work on their own, but in the same way that we seek an all of Government approach, the message is one of ‘all of Ireland’” approach. Many of

RISK	MITIGATION
<p>9. People with lived experience do not support the new model</p>	<ul style="list-style-type: none"> — The proposed model has been consulted on with people who have lived experience of the current system and their comments taken into account in designing the new model. — The inclusion of people with lived experience on the Accommodation Committees also allow for people to be part of the on-going decision-making process. — As the process moves forward people in the protection process should be regularly consulted. — The milestones mentioned above and below should be set and, when met, regularly communicated.
<p>10. Failure to allocate funding to achieve the new model of housing in any individual year</p>	<ul style="list-style-type: none"> — Reiterate need for long term investment, that investing today will result in a longer term dividend. — Accommodation built can be multi purpose: it can go back in to the pool of wider housing supply if not needed or circumstances change. — That existing system is already extremely expensive but has little return on investment.
<p>11. Failure to properly allocate funding between current spending and capital</p>	<ul style="list-style-type: none"> — The benefits of capital investment over current spending should be made clear, as compared to ad hoc annual funding.
<p>12. Failure to allocate responsibility to an appropriate department.</p>	<ul style="list-style-type: none"> — Harness buy-in from all of government (through the White Paper and Cabinet Committee) to link policy and funding and build in other benefits and policy objectives.

RISK	MITIGATION
<p>13. Transitioning from current to capital spend falters as pressure to maintain services builds; international protection is currently funded entirely from current spending</p>	<ul style="list-style-type: none"> — Create a funding model that reflects the ultimate objective and build agreement around a series of steps and time scales to achieve the change process.
<p>14. No alternative is developed to decant existing arrangements and current contracts continue alongside new models of operation.</p> <p>Current long-term contracts with private sector providers are not framed by a cost benefit analysis and are difficult to end or renegotiate</p>	<p>A series of “critical junctures” should be highlighted in the plan with identified critical milestones such as:</p> <ul style="list-style-type: none"> — funding streams for each element on multi-annual basis — new contracts to reflect revised model — new oversight monitoring reporting arrangements — breaking the plan into a series of stages to promote multi-annual funding envelopes for each stage — Identify current leasing and contractual arrangements/ timescales and align with new delivery where possible.
<p>15. Failure to recognise that, in the short-term as capital investment increases and legacy contractual arrangements are wound-down, total public spending in this area will actually increase</p>	<ul style="list-style-type: none"> — All government departments in particular Department of Public Expenditure and Department of Finance should recognise this. — Exchequer funding is put in place for the entirety of the process, rather than being allocated on an annualised basis in each Budget. — Budgets should show projected current spend and capital over a number of years until spending evens out (i.e. once the transitional phase is over based on the reducing amounts needed for revenue spend year on year).

RISK	MITIGATION
<p>16. Fail to take long term view of spend needed to create new assets. Rebalancing of spend will reflect the whole of life costs related to providing long term assets.</p>	<ul style="list-style-type: none"> — Government to be aware of the points at which the benefits of this new model will happen. Landmark stages will need ‘quick wins’ built in until the entire process is complete. These and the scheduled landmark successes will demonstrate the value of the new model.
<p>17. Failure to properly assign ownership of budgets and the failure to recognise capital funding provision as part of the National Investment Plan.</p>	<ul style="list-style-type: none"> — Need to separate the annual operational costs and the cost of servicing capital debt from long term funding. — Any review of the National Development Plans (and associated long-term plans) should recognise the importance of this project across government and be a core project in any new funding initiatives.
<p>18. Political pressure to deliver a cut-down or modified version of this model, to protect existing funding streams.</p>	<ul style="list-style-type: none"> — The spending of public money to underpin these reforms is overseen and monitored by the Comptroller and Auditor General, the Oireachtas and others, who understand the purpose and logic of this spending.
<p>19. Poor project management and inexperience by contracting parties may limit the timescale for delivery of housing at the required scale.</p>	<ul style="list-style-type: none"> — Upskilling, training, and harnessing of prior experience. — As recommended, strong consideration of a new project management office or arms length body or entity to project management the identification and delivery of new accommodation. This would allow for a more dynamic approach than possibly delivered by a Government
<p>20. Failure to make legal changes required to support the model. (Changes to HAP, employment and rights to work etc.)</p>	<ul style="list-style-type: none"> — Demonstration of value for money to be achieved from facilitation of self-help and empowerment approach.

20 Protection Accommodation and mainstream housing

- 20.1 This section tries to situate protection accommodation compared to wider housing and homelessness policy. Protection accommodation is governed by the Reception Conditions Directive which Ireland [adopted](#) in 2018 and which placed the reception system on a legislative footing for the first time. Protection accommodation has distinct features. Access to reception conditions is provided to a person who has given an indication of intention to seek asylum and who does not have sufficient means to an adequate standard of living. There is no other eligibility condition and anyone seeking protection, (applying for international protection) is accommodated pending the outcome of their application. This right to accommodation is in contrast to that of a homeless person who needs to meet certain criteria to be considered eligible for assistance with housing by the State as set down in the [Housing \(Miscellaneous Provisions\) Act 2009](#). In addition, a person seeking protection has a specific right to both [education and health](#) and other important supports (neither of which, to our knowledge, are specified elsewhere in Irish law). While implementation of these rights is well recorded as being [poor](#), on paper at least they are relatively high.
- 20.2 As such, the right to immediate accommodation as a protection applicant, in some ways, goes beyond those of an Irish person requiring shelter. This is because people seeking protection and refugees have unique accommodation needs. These include a need for immediate safe sanctuary; they may have little or no connections to the State to which they are applying for protection and a need for longer term stable accommodation from which to build a new life in a new country when their status is granted.
- 20.3 Some critics of the current system of Direct Provision understandably take the view that treating people seeking protection in any way differently to other people in Irish society is a step towards segregation rather than facilitating integration. They believe that accommodation should be accessed through the mainstream routes available to any other person in Irish society. This view is valid and well founded on the 20-year experience of Direct Provision. Any new model should carefully consider, whether by accident or design, it is contributing to segregation or whether it is aiming to achieve equality between people seeking protection and their peers in Irish society.
- 20.4 In our analysis, for a 'mainstream' approach to be viable it requires a homelessness prevention policy and implementing infrastructure that works and a well-functioning housing market, able to meet the housing needs of all people effectively. Neither of these two essential building blocks are in place at the moment. Nor are they likely to be for some time due to housing pressures and the likely impact of Covid-19 on the housing market.

- 20.5 Our model is a pragmatic response to achieve the same result of equal rights to long term housing by giving specific access to forms of accommodation that protect people's right to protection and providing stable good quality housing while awaiting a decision on their protection claim. In short: equality of outcomes but through different means. We acknowledge that there are risks in creating a separate accommodation pathway but we believe that, given the pressures in the mainstream housing system and the dysfunctions of the wider housing market, this is the best way to protect people's rights to protection. In the longer term, the two systems should ultimately become one. Protection accommodation is dependent on the wider housing market and supply context as well as wider housing policy. In the absence of wider housing policy changes and improvements we have attempted to provide a framework for making serious changes to the current system of accommodation for asylum seekers and refugees.
- 20.6 Ireland's protection accommodation is currently designated through Direct Provision centres which are dispersed across the country, and welfare payments are tied to this accommodation. Reception accommodation and the dispersed Direct Provision is temporary, with asylum seekers and refugees being accommodated pending their applications being determined. Those who receive a positive decision are then supported to find permanent mainstream housing. Direct Provision is also let on a "licence" basis and people living in Direct Provision have permission to stay there only if they meet certain conditions, including co-operating with the system for determining their status.
- 20.7 We have examined the issues of whether the solution should provide temporary or permanent accommodation. We have opted for a pathway approach that provides immediate short-term (3 months) 'Stage 1' accommodation and an assessment of needs via a reception centre model. In this model, accommodation is let through a specific and tailored licence agreement. We have also set out a model for Stage 2 community-based accommodation that provides longer term stability and enables integration and the beginning of the process of putting down roots.
- 20.8 Our preference is that this accommodation is provided as a tenancy (rather than a licence basis). Our understanding is that people without a settled claim are not able to hold a tenancy, so legal solution will need to be sought on this. If let on a licence, this should allow them to remain under a licence during any extended period in the accommodation whilst resettlement and planned move on support is provided. Insofar as is possible, our proposals for Stage 2 accommodation are predicated on the need for a new pipeline of housing to be supplied, and that this new supply will be drawn from new and separate funding to that for mainstream housing supply and will not be in competition with efforts and funding being directed to meet the existing shortfall in housing.

21 The Impact of Covid-19

- 21.1 This section gives some commentary on the impact of Covid-19 on protection accommodation and related issues. Initial impact of Covid-19 has been to reduce numbers seeking asylum; the figure for 2020 is estimated by the Irish Refugee Council to be 1,550 people rather than close to 4,782, the number for 2019. It is not clear whether this fall in numbers will continue, or whether, as we learn to live with the virus, people will revert to previous norms for migration, which were seeing a year on year increase in numbers.
- 21.2 Covid-19 has also brought to the fore issues related to [congregated living](#) and the ability of people to socially distance and to self-isolate. These issues are affecting all sectors where congregate living and sharing of facilities has been a feature including homeless hostels, night shelters, and residential care homes for the elderly. The prognosis for the pandemic is that it will continue to impact our lives for the foreseeable future. Therefore, this kind of living arrangement is untenable and alternatives to shared accommodation and shared facilities are needed.
- 21.3 On a broader level Covid-19 is predicted to lead to increases in unemployment. The impact of this on the wider economy and housing market is being suppressed through State welfare support payments. As these are withdrawn in the future, there is a likelihood that house prices may fall, credit may also be constrained by lenders, and city centres may never return to pre-pandemic levels of foot-fall or occupancy as people are able to work from. All these factors will have an impact on housing demand as well as supply and will influence where new housing supply needs to be. It may also influence the future role of towns and cities. ESRI also suggest that there will be a need to increase significantly the state's provision of social and affordable housing into the future.
- 21.4 Covid-19 presents many current and future challenges to the way we live, how our communities' function, our villages, towns and cities operate and our social and welfare policies must be implemented. It also however offers us the opportunity to be radical and do things differently, to re-imagine a new system for housing protection applicants and refugees.

22 Conclusions

- 22.1 It is agreed by government via the Programme for Government and in the wider community that the current system of accommodating asylum seekers and refugees through Direct Provision should end. The Advisory Group Report has addressed a wide range of areas that require change and reform.

- 22.2 Our report seeks to build on that by making further suggestions and proposing a model for replacing Direct Provision with a hybrid model. This multi-sourced approach we believe sources accommodation from different parts of the housing system as well as across different regions of Ireland and provides a blue-print for achieving the step-change needed to deliver the required change.
- 22.3 We have proposed that the new model is designed as a pathway that results in individuals and families being housed quickly in suitable and safe reception centres and then supported to move within three months to suitable Stage Two accommodation.
- 22.4 We have proposed a step-change in the ethos of accommodating asylum seekers and refugees; this is based on supporting wherever possible people to find their own solutions, to have choice of location, as far as possible and for all options to be available (rather than a system that disincentivises people from making their own arrangements for housing).
- 22.5 We have also proposed a governance structure at central and regional government to underpin the delivery of the new model we propose. This is based on a partnership between relevant stakeholders, central and local government, health, the charity sector, faith groups, local communities and people with lived experience. It is only through such a partnership that all elements of the system change needed to implement the new model can be delivered.
- 22.6 For our proposed approach to work there will need to be commitment from government to finance the new model over the life of the four-year programme, with action taken to begin the implementation in 2021. This should include a strategy for winding down existing Direct Provision centres and establishing the governance structure required for delivery of the new model. Such actions would show commitment and build the momentum for change.

Appendix



Appendix 1 - Documents Reviewed

Advisory Group on the Provision of Support including Accommodation to Persons in the International Protection Process Analysis of Costs

Advisory Group



Assessing the impacts of COVID-19 on the Irish property market: An overview of the issues

M. Allen-Coghlan, K. McQuinn and C. O'Toole



Beyond McMahon – Reflections on the Future of Asylum Reception in Ireland

Nasc & CCJHR (2018)

Briefing note on the ongoing work of the Advisory Group on Direct Provision

Catherine Day (May 2020)

CCMA Submission to Advisory Group on Those with Status

CCMA (County and City Management Association)

Direct Provision Paper

De Paul (September 2020)



Direct provision system is broken – let's fix it

Eoin O'Broin, Sunday Business Post

Implementing Alternatives to Direct Provision: Model Summary

Irish Refugee Council

Manifesto commitments from relevant political parties/other organisations on Direct Provision

Observations on an excerpt from the Draft Report of the Advisory Group on Direct Provision

Advisory Group on Direct Provision

Paper on Costings for Housing Support

Advisory Group on Direct Provision

Persons in the International Protection Process

September 2020

Programme for Government – Our Shared Future



Protection with Dignity: Roadmap to System Change"

Jesuit Refugee Service Ireland (June 2020)



Report of the Advisory Group on the Provision of Support including Accommodation to Persons in the International Protection Process”

Advisory Group (September 2020)



Report on Direct Provision and the International Protection Application Process”

Houses of the Oireachtas (2019)



Report on the Working Conference on Reception & Housing of Migrants and Refugees

City of Amsterdam, coordinator of the Partnership on Inclusion of Migrants and Refugees, and the European Urban Knowledge Network (2016)



Spending Review 2019, Direct Provision: Overview of current accommodation expenditure

IGEES unit of the Department of Justice and Equality



Trends Analysis, Housing Assistance Payment (2014 – 2019) Housing, Planning and Local Government Vote Department of Public Expenditure & Reform

Paul Kilkenny

35 properties to be leased in Galway city centre to house asylum seekers

RTE Newsroom

Appendix 2 - Stakeholder consultation

Individual interviews

- Brian O’Gorman, Chief Executive, and Fiona Dunkin, Housing Policy Analyst, Clúid Housing
- David Carrol, Chief Executive, De Paul
- Edward Dunne, Chairman, Dídean
- Eoin Ó Broin, Teachta Dála for Dublin Mid-West
- Eugene Quinn, National Director, Jesuit Refugee Services
- Fiona Finn, Chief Executive, Nasc
- Rachel Doyle, Joint National Co-Ordinator, Community Work Ireland
- Tanya Ward, Chief Executive, Children’s Rights Alliance
- Justin O’Brien, previous Chief Executive of Circle Voluntary Housing Association and President of the Irish Council for Social Housing.

Appendix 3 – Irish Expert Biographies

Orla Hegarty BArch FRIAI RIBA

UCD profile: <https://people.ucd.ie/orla.hegarty>

Architect and assistant professor at the School of Architecture, Planning and Environmental Policy in University College Dublin. Her teaching role is as Programme Director for the final professional examination for architecture graduates. Prior to her role in UCD, she was in architectural practice in Ireland, the UK and France, designing and delivering a wide range of building types and developments.

Peter Stafford PhD, BL

Practicing barrister in civil law, specialising in medical negligence, personal injury and data privacy law. Author of journal reports on practice and procedure in the Supreme Court, reform of residential tenancy and planning law, and reform of litigation supports for lay litigants/unrepresented parties to litigation. Previously, senior management roles in business representative organisations and professional bodies in the property and construction sectors. Management of delivery of submissions and policy documents, and advocacy and lobbying work.

Peter Minnock

Over 40 years public service experience working in five local authorities, with periods in Government Department and as consultant for World Bank and EU. Has lead change in the Irish local authority sector: implemented settlement of refugees from Sudan and Eritrea in 2012 in Naas; developed Integration Strategy for Kildare; delivered over 700 social and affordable under Part V process; extensive developments with Approved Housing Bodies including much acclaimed McAuley Place for Older People.

STATE OWNED 2021 CONTRACT EXPIRY				
Country	Location	Company	Occupancy (Oct 2020)	Contract End Date
Kerry	Atlas House (Killarney)	OFM	92	09/11/2021
Kerry	Atlas House (Tralee)	OFM	95	09/11/2021
Kerry	Johnston Marina	OFM	68	09/11/2021
Kerry	Park Lodge	OFM	37	09/11/2021
Clare	Knockalisheen	Aramark		24/11/2021
Cork	Kinsale Road Accommodation Centre	Aramark		24/11/2021
Westmeath	Athlone Accommodation Centre	Aramark	261	24/11/2021
COMMERCIAL 2020 EXPIRY				
Country	Location	Company	Occupancy (Oct 2020)	Contract End Date
Galway	Eglinton Hotel	Mapel Star Ltd	171	19/05/2020
Galway	Great Western House	Side Tracks Ltd T/A Great Western	94	14/07/2020
Leitrim	Carraig Accommodation Centre	Townbe ULC	91	01/11/2020

COMMERCIAL 2021 EXPIRY				
Country	Location	Company	Occupancy (Oct 2020)	Contract End Date
Louth	Carroll Village	East Coast Catering (Ireland)		10/01/2021
Wexford	Rosslare Port Lodge	Codelix Ltd	85	25/02/2021
Limerick	Griffin House	Double EX Investments Ltd	65	21/03/2021
Kildare	Eyrepowell	Peachport Ltd	115	29/03/2021
Sligo	Globe House	Bridgestock Care Ltd	177	29/03/2021
Dublin	The Central Inn	Codelix Ltd	114	04/04/2021
Laois	The Montague Hotel	Fazyard Ltd	189	21/04/2021
Cork	Ashbourne Hse	Barlow Properties	94	28/04/2021
Kildare	The Hazel Hotel	Oscar Dawn Ltd	82	10/06/2021
Tipperary	Riverside Apartments	Double M Investments Ltd	73	28/09/2021
Westmeath	Temple Accommodation Centre	Townbe ULC	104	01/10/2021

COMMERCIAL 2021 EXPIRY				
Country	Location	Company	Occupancy (Oct 2020)	Contract End Date
Meath	Mosney	Mosney	644	28/10/2021
Waterford	Birchwood House	Stompool Investments Ltd	126	01/11/2021
Wicklow	The Grand Hotel	Vesta Hotels T/A Grand Hotel	87	29/11/2021
Longford	Richmond Court	Mint Horizon	51	01/12/2021
Tipperary	Bridgewater House	Millstreet Equestrian Services	133	01/12/2021
Clare	Clare Lodge Hostel	Bridgestock Care Ltd	31	04/12/2021
COMMERCIAL 2022 EXPIRY				
Country	Location	Company	Occupancy (Oct 2020)	Contract End Date
Laois	Hibernian Hotel	Flodale Ltd	48	20/01/2022
Kerry	Linden House	Millstreet Equestrian Services	79	25/01/2022
Offaly	Marian Hostel	Bridgestock Care Ltd	90	01/02/2022

Cork	Davis Lane Apartments	Millstreet Equestrian Services	56	11/02/2022
Cork	Millstreet Accommodation Centre	Millstreet Equestrian Services	294	11/02/2022
Kerry	Atlantic Lodge	Millstreet Equestrian Services	53	11/02/2022
Cork	Clonakilty Lodge	D & A Pizzas Ltd	95	12/02/2022
Clare	The King Thomond Hotel	James White & Co.	127	06/03/2022
Waterford	Atlantic House	Atlantic Blue Ltd	73	30/06/2022
Dublin	The Towers	Fazyard	194	31/07/2022
Galway	Dominick Street Apartment Complex	Keldesso Ltd.		05/08/2022
Mayo	The Old Convent	Bridgestock Care Ltd	222	12/08/2022
Limerick	Hanratty's Hotel	Birch Rentals Ltd	89	19/08/2022
Waterford	Ocean View	Ocean View Accommodation Ltd	96	05/10/2022

Cork	Glenvera Hostel	Bideau Ltd	91	16/11/2022
Waterford	Viking House	Millstreet Equestrian Services	76	16/11/2022
Meath	Mosney Accommodation Centre	Mosney		07/12/2022
COMMERCIAL 2023 EXPIRY				
Country	Location	Company	Occupancy (Oct 2020)	Contract End Date
Dublin	Balseskin	East Coast Catering (Ireland)	0	01/07/2023
EMERGENCY CENTRES 2020 EXPIRY				
Country	Location	Company	Contract End Date	
Wicklow	The Esplanade	Parmont Ltd	06/12/2020	
Dublin	Holiday Inn Express Dublin Airport	Tifco hotel groups	18/12/2020	
EMERGENCY CENTRES 2020 EXPIRY				
Cavan	Dun Na Ri House Hotel	Brimwood Ltd	10/01/2021	
Cork	Riverside Park Hotel	Next Week & Co Ltd	10/01/2021	

Country	Location	Company	Contract End Date	
Donegal	Portsalon House	Port Salon House Ltd	10/01/2021	
Dublin	Bolton Street	TA Deerpark Ltd	10/01/2021	
Laois	Commercial Inn	Flodale Ltd	10/01/2021	
Louth	Carnbeg Hotel	Brimwood Ltd	10/01/2021	
Louth	Setanta Guest-house	Brimwood Ltd	10/01/2021	
Meath	San Giovanni House	Brimwood Ltd	10/01/2021	
Meath	Alverno House	Brimwood Ltd	10/01/2021	
Meath	The Lodge	Lerrigh Support Services Ltd	10/01/2021	
Monaghan	Lake View, Ballytrain	Brimwood Ltd	10/01/2021	
Monaghan	Lisanisk House Hotel	Brimwood Ltd	10/01/2021	
Monaghan	Lake House Bed and Breakfast	Brimwood Ltd	10/01/2021	
Monaghan	Treacy's Hotel	Brimwood Ltd	10/01/2021	

Country	Location	Company	Contract End Date	
Offaly	Shannon Lodge Hotel	Shannon Lodge Hotel	10/01/2021	
Offaly	Dunkerrin Arms	Foxlair Ltd	10/01/2021	
Tipperary	The White House	Foxlair Ltd	10/01/2021	
Waterford	Barnawee Bridge B&B	Barnawee B&B	10/01/2021	
Wicklow	Rathmore Country Holiday Village	E & B Hotel Ltd T/A Rathmore Country House	10/01/2021	
Dublin	The Central Hotel	Townbe ULC	12/01/2021	
Dublin	Emmet Road	Coolebridge Ltd	12/01/2021	
Dublin	Moate Lodge	Moat Lodge B&B Ltd	03/02/2021	
Cork	Travelodge Cork	Travelodge Ireland	09/02/2021	
Dublin	Travelodge Dublin Phoenix Park	Travelodge Ireland	09/02/2021	
Galway	Travelodge Galway	Travelodge Ireland	09/02/2021	

Country	Location	Company	Contract End Date	
Dublin	Airport Manor Hotel	Brimwood Ltd	14/02/2021	
Galway	The Merriman Hotel	WAG Merriman Ltd	13/03/2021	
Wexford	Court Town Hotel	Blockford Ltd	19/03/2021	
Dublin	Leitrim Lodge	Leitrim Lodge B&B	27/03/2021	
Dublin	Cornerpark Lodge	Paul Sweeney T/A Cornor Park Lodge	28/03/2021	



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a just, fair and inclusive society for people seeking asylum.