



FEANTSA Report:

**The Future of Ireland's
Asylum System: a Focus on
Housing**

Aisling Slein
November 2021

Introduction

As a solution to manage the increase of asylum seekers within the Irish state, the Government established the supposed ‘temporary’ entity that is Direct Provision (DP). However, 21 years from its creation, Direct Provision stands as a permanent governance mechanism of inward migration. Over the last two decades, the system has been condemned for its brutality and inhumane treatment of those seeking International Protection.

In February 2021, the government produced a ‘White Paper on Ending Direct Provision’ (2021), providing a new sense of hope for the future of those passing through this system. The paper outlines the government’s new approach to abolishing the DP system. Implementing a two-phased operation, the government will concentrate on enhancing the integration of asylum seekers into Irish society, enabling independent living lifestyles and the promotion of human rights (Department of Children, 2021). Alternatively to the current system, an asylum seeker’s duration in a reception and integration centre will be limited to 4 months (Department of Children, 2021). Once completed, the Housing Agency in partnership with the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) will provide asylum seekers with housing options depending on the specific needs identified (Department of Children, 2021).

This paper aims to contribute to the public conversation surrounding the future of the Irish Government's White Paper proposals to end the DP system. The various elements of DP accommodation (living standards, location etc) have proven to negatively impact asylum seekers mental and physical health as well as their opportunities to avail of education, employment, healthcare and community integration (Department of Children, 2021). Because of the far-reaching effects DP accommodation has on asylum seekers quality of life, successful implementation of the new accommodation models is a fundamental piece in the process of abolishing DP and the establishment of a new asylum system. A primary issue of DP accommodation in Ireland is the presence of overcrowding and shared living spaces and their resulting negative effects on the lives of asylum seekers (Walshe & Henderson, “Powerless” Experiences of Direct Provision During the Covid-19 Pandemic August 2020, 2020). To combat this, the new models of accommodation to be provided for asylum seekers will be either own-door or own-room (Department of Children, 2021). This accommodation will be sourced primarily by the Approved Housing Bodies (AHB). According to the new White Paper, asylum seekers will have access to social welfare supports that currently excludes them, as well as rent subsidies from the state to assist independent living. The location of the supply of housing will be determined by the National Settlement plan to increase integration and employment opportunities. The proposal also provides solutions for issues related to staff training, English proficiency of asylum seekers, education access for children and young adults and healthcare present in DP. The interception and rectification of these issues are equally as important as the accommodation-specific issues, however, as the European Federation of National Organisations working with the Homeless, FEANTSA works to put an end to homelessness and advocates for a housing led approach, therefore this paper will focus primarily on the accommodation proposals of the White Paper.

Through the qualitative method of interviewing as well as through a desktop analysis, this paper seeks to explore the concerns and alternative solutions to the existing and proposed accommodation models. With this paper we aim to further contribute to the ongoing public discussion on the possible success of the proposed new system for asylum seekers in Ireland and at this early stage, highlight potential complications.

This paper is dedicated to a dear friend, Michelle, an asylum seeker I was so lucky to befriend during the Pandemic. I'm sorry for the hardships you've faced at the hands of the Direct Provision System. Thank you for opening my eyes to the brutality many of us choose not to see. I hope with each day in Ireland your future gets brighter.

Acknowledgements

First and foremost, it has been an honour of mine to contribute to the admirable work FEANTSA does, with their sole purpose to improve the homeless crisis at the European level. This opportunity would not have been obtainable without the collaboration of Trinity College Dublin and FEANTSA. Therefore, I would like to thank Trinity's School of Social Work and Social Policy for creating such a rewarding, educational endeavour for its students. Secondly, I would like to graciously thank my internship supervisor, Simona Barbu, for this paper would not be here today without her tireless guidance and expertise. Thirdly, I would like to thank my confidant, Carolyn McCarthy, for generously providing her time to participate in a rehearsal interview as a pilot study. Finally, my sincerest gratitude to all the interviewees that took part in this study, namely Wayne Stanley (The Head of Policy and Communications at the Simon Community of Ireland), Eoin O'Sullivan (a researcher at the European Observatory on Homelessness, Professor in Social Policy at Trinity College (n.d.) and Chair of the statutory National Traveller Accommodation Consultative Committee) and two members of DePaul. Your knowledge and experience on the social issue that is homelessness have provided this paper with substance and a purpose; to improve the futures of those in the Direct Provision system by contributing to the preparation for transitioning to an asylum system founded on benevolence.

Methodology

This paper is based on desktop research complemented by information collected through a number of 3 semi-structured interviews. To provide additional guidance on the operation of the transition from the Direct Provision to the new asylum system proposed by the new White Paper, several interviews were conducted with some of Ireland's leading Irish NGO's members and academics in the area of homelessness and who are also experienced with migration issues. Through this research, their opinions and concerns regarding the accommodation models proposed were discussed. By early recognition of possible gaps in the proposals, it is hoped this research will help to reduce the hindrances faced at the stage of implementation.

Considering their regular interaction with the homeless population, the approved housing bodies (AHB) of DePaul and the Simon Community of Ireland were chosen as optimal recruitment pools for interviewing. Two members of DePaul, who wish to remain anonymous, were jointly interviewed. Wayne Stanley (from here forth will be referred to as Stanley), Head of Policy and Communications at Simon Communities of Ireland, was also interviewed. Finally, Eoin O'Sullivan (from here forth will be referred to as O'Sullivan), Professor in Social Policy at Trinity College was interviewed.

Access and Sampling

As DePaul and the Simon Community of Ireland are two member organisations of FEANTSA, their views on the matter were of considerable interest to this research and were the first point of contact. Access was gained to the specific members of each organisation through FEANTSA contact point. Regarding sampling methods, purposive sampling was performed to capture the "knowledge and expertise" (Sarantakos, 2013, p. 178) of those working directly with/for asylum seekers and who will regularly engage with the new system. As we intended to reflect the experiences of FEANTSA members in relation to housing and migrants, asylum seekers and refugees, the inclusion criteria was primarily to be a member of FEANTSA's European Observatory on Homelessness or a member of one of the Irish affiliated organisations of FEANTSA. However, the number of the organisations consulted could not be bigger on considerations of available time for preparing the paper.

Data Collection

After reviewing existing literature surrounding the current state of DP accommodation and the proposed accommodation models, several questions arose relating to the future of accommodation standards, management style, provision of accommodation needed changes, management of housing supply and the private housing sector's role in ending DP. These areas of ambiguity within the White Paper created the main body of questions for the interviews, with each primary question having follow-up prompt questions. Additionally, general questions surrounding the future makings of the new system were included. Before conducting the interviews, a pilot study in the form of a rehearsal interview was run with a recent graduate of Sociology and Social Policy at Trinity college, Carolyn McCarthy. Her undergraduate thesis was dedicated to centring the voices of asylum seekers at the heart of her research to highlight the institutionalism of the system (2021), thus making her a suitable candidate to test the interview guide. This proved to be a necessary preliminary step in the research process. The structure of the questions, as a result, were altered to suit the natural flow of conversation. Several questions were also modified as the pilot study highlighted their vagueness and/or irrelevance to the topic. Three interviews were conducted via Zoom to investigate the research topic. Each interview varied in duration, lasting between 30-60 minutes. A request was made for the interviewee's permission to be recorded and a clarification as to whether they would like to maintain their anonymity in the resulting research paper.

Data Analysis

The Interviews were manually transcribed by the researcher. A graph split into three columns titled 'Transcript', 'Quote' and 'Description' was created for the application of 'In Vivo' coding. This method of data analysis was chosen to reduce researcher bias by focusing on the use of "the participant's own language" (2020, p. 112) through direct quotation. Significant quotes were chosen from the transcript and accompanied by a description of the thematic nature of the quote. These quotes would be used to reflect the prominent themes of each discussion. A pattern of prominent themes was identified amongst all interview transcripts through analysing the significant quotations. The deduction of primary themes using the method described provides an opportunity for the emergence of empirical patterns of current attitude and thought surrounding the future of the DP system and its accommodation models.

Ethical Considerations

As a white Irish native, my research needs to reflect an understanding of the unequal power dynamics inevitably present within this research. As demonstrated in Vukašin Nedeljkovic's 'Asylum Archive' (2018), the portrayal of the asylum-seeking experience through the white western lens can reduce the asylum seeker to a "passive object of charity" (2020), intentionally or unintentionally. A researcher must understand their standpoint and influence on the analysis and representation of the experiences of others. This is an aspect of research conduction that will be repeatedly referred to and reflected on by the researcher to understand their instrumentality in this process. The research method chosen does not represent asylum seeker's opinions on their potential future conditions within DP or of the future of the system as a whole. However, the opinions and concerns discussed in the following chapters are not produced out of isolation from the experience of asylum seekers. They are rather formed out of an understanding of the issues identified by the asylum-seeking population and an in-depth knowledge of the inner workings of government services, such as DP, as expressed by organisations working in the field. To conclude, the discussions to follow are reflections on a paper proposal, not on an implemented system. This research aims to contribute to existing academic discussion, highlighting potential areas of concern or alternative methods of implementation to the model proposed.

Limitations

Indubitably, some limitations arose from this study. Firstly, as mentioned above, the interviews were limited at reaching out members of civil society in Ireland and it was not possible, because of a lack of time and access, to interview asylum seekers directly for including their voices. Also as a consequence of the limited time available, only certain aspects of the White Paper could be discussed. As a result, this research was not able to exhaustively research all areas of interest. Furthermore, within the time frame allocated, only three interviews could be conducted. Amongst the interviews that were carried out, the focus group-like interview with DePaul members yielded a more expansive set of material. This could be credited to the element of natural discussion that is associated with focus groups. In a future study, it may be more beneficial to carry out focus groups rather than individual interviews (both for civil society members and asylum seekers residing in Ireland). In this way, there is an opportunity for additional participants to discuss matters, generating more data within the same time frame. As well as that, perhaps a second pilot study could have been useful to further improve the set of interview questions.

Background

The Formation of the DP System

Before the establishment of DP, migrants passing through Ireland's International Protection system were entitled to similar benefits to an Irish citizen, such as the standard weekly social welfare allowance (Murphy, 2021). Additionally, they were provided with social housing accommodation whilst waiting for further deliberation on their case (McCarthy, 2021). However, an exponential surge in migrant numbers led to an overwhelmed welfare system and an equally resistant Irish population, with 74% wishing for stricter policies targeting immigrants (Hilliard, 2019). As a result, the system of DP was enacted in April 2000 (Loyal & Quilley, 2016).

Obliged under the EU Reception Conditions Directive (2021), Ireland must provide asylum seekers with material conditions for the duration of their stay while their case is being processed by the International Protection Office (IPO). The International Protection Accommodation Service (IPAS) source, arrange and monitor DP accommodation for asylum seekers (Reception and Integration Agency, 2010). When applying to claim asylum in Ireland, a migrant should be offered initial accommodation in the Reception and Integration centre, then transfer to one of the 44 DP centres across the country (Day, 2020). There are currently 7,783 asylum seekers living in these accommodation centres (Day, 2020). The accommodation centres are adapted “prefabs, hotels and guesthouses, mobile homes and even “flotels” (accommodation centres docked in port)” (2019, p. para.10), deemed suitable living environments because of their intended short term utilisation. 7 of these DP centres are state-owned while the majority are privately owned by enterprises (Day, 2020). Those availing of DP accommodation are supplied with daily meals and given a weekly allowance of €38.80, while children receive €29.80 (Murphy, 2021). This is the only social welfare payment they have access to as the coverage of other expenses by the system of Exceptional Needs Payments was ceased in 2012, now only covering the cost of nappies (Hilliard, 2019). By 2009, asylum seekers were essentially denied access to most social welfare payments, such as child benefits and rent allowance (Hilliard, 2019). In 2018, the Supreme Court removed the ban which prevented asylum seekers to acquire a work permit (Healy, Bennett, Murphy, Rogers, & Reynolds, 2021). They can now apply for the permit 6 months after submitting their asylum application (Healy, Bennett, Murphy, Rogers, & Reynolds, 2021). Those granted refugee statuses are legally allowed to remain in the state but must move out of DP accommodation if that is where they reside at the moment when receiving the refugee status (Citizens Information Board, 2019). They have the option to either apply for social housing or independently search for accommodation within the private rental sector (Citizens Information Board, 2019), with most only having 2/3 weeks to vacate direct provision accommodation once granted refugee status (Raghallaigh & Foreman, 2015)

Current Issues with DP Accommodation

As previously mentioned, the DP system and its accommodation were established as a short term solution to the rising migrant count in Ireland. However, 21 years post its erection, asylum seekers remain within the walls of DP centres with few possibilities to obtain independent adequate accommodation. Several obstacles within the system contribute to its extended existence. Firstly, the average time spent determining a first instance decision for a single case of asylum request was 20.3 months by the end of 2020 (IGEES Unit: Department of Justice and Equality, 2019). This delay in case processing is creating an extension of an asylum seeker's time spent in DP accommodation, which has now been documented to average over 3 years (Raghallaigh M. N., et al., 2016). This results in a further delay in receiving certain benefits after being granted refugee status, such as social welfare benefits, accessing drivers licence and in turn, sourcing their private accommodation. The backlog within the processing system contributes to the ongoing dependence of asylum seekers on the system and the

surmounting state costs to run DP accommodation, which reached €78 million in 2018 (2019) and continue to rise.

As stated above, the majority of current accommodation centres currently are refurbished buildings, built with alternative purposes to that of being a DP centre (for example hostels and B&B). Only three have been "purpose-built" for housing asylum seekers (McCarthy, 2021, p. 18). The alternative use of properties as DP centres can greatly impact the quality of life for asylum seekers. For example, many of these centres are isolated and rurally located, causing difficulties to secure employment for those who have the right (Murphy, 2021). This hinders their economic independence. Additionally, the isolated areas within which many DP centres reside has been said to negatively impact asylum-seeking children's social integration (Ombudsman for Children's Office, 2020). The inadequacy of available transport reinforces their sense of social exclusion as a result of being unable to participate in school extracurricular activities (Ombudsman for Children's Office, 2020).

Another area of concern is overcrowding within DP centres. It has been well documented that there are both mental and physical consequences of overcrowding within DP centres (Walshe & Henderson, 2020). Several strangers sharing living quarters eliminates any element of individual privacy, as one asylum seeker clearly illustrates with this comparison, "*a prison cell in Mountjoy prison has more privacy than a room in Knockalisheen*"¹ (McCarthy, 2021, p. 32). The removal of one's right to privacy can have detrimental effects on their mental health, such as their feelings of security when in shared accommodation with others of conflicting religions and cultures (Walshe & Henderson, "Powerless" Experiences of Direct Provision During the Covid-19 Pandemic August 2020, 2020). The issue of privacy violations has been exacerbated in Covid times for asylum seekers. With children attending online classes in cramped areas, asylum seekers may feel further exposed by the operation of cameras in overcrowded rooms (Walshe & Henderson, "Powerless" Experiences of Direct Provision During the Covid-19 Pandemic August 2020, 2020). Not only has overcrowding created challenges in terms of privacy, but it also creates a disruptive environment for children participating in education (Hennessy, 2021). In terms of physical health, the issue of overcrowding has been repeatedly linked to deteriorating physical health (Social Justice Ireland, 2019). As a result of the pandemic, overcrowding has created further detrimental health issues for asylum seekers. The limited space within DP accommodation has made it virtually impossible to follow national health guidelines of social distancing and the implementation of other Covid-19 health standards (Claudia Bonamini, 2021). As a result of the media publicizing the higher contraction risk due to the impossibility to implement prevention measures within the DP system, asylum seekers have received increased racism and alienation from their communities (Murphy, 2021).

Sourcing Independent Accommodation

Once granted International Protection status, refugees have the right to remain and source permanent housing options with the help of state-provided supports, if desired (Minister for Housing, 2018). However, the transition from DP accommodation to independent living isn't as simple as it may seem. By the end of March 2021, over 1000 persons had been granted leave-to-remain and yet they still currently reside in DP accommodation (Ryan, 2021). Several obstructions lay between asylum seekers and sourcing private accommodation, forcing those who have gained status to endure longer residency within DP centres. This next section will discuss the possible routes out of DP accommodation available: local authority Housing, Private rental sector and state subsidies. Unfortunately, for many refugees, these options are not successful in their implementation, which has resulted in high rates of migrant homelessness. The issue of homelessness amongst migrants exiting the DP system will also be addressed.

¹ Knockalisheen Direct Provision Centre is located in Meelick, Co.Clare.

Local Authorities provide social housing units to individuals on the housing list (Citizens Information, 2021). For those who are deemed eligible and are placed on the housing list, long-term housing is not guaranteed to be immediately provided due to long waiting lists (2018) and the “broader housing crisis” (Ryan, 2021). Therefore, many are left to precariously take shelter in emergency accommodation, as reflected in the reducing numbers of adults being able to exit emergency accommodation and enter social housing (O’Sullivan, Reidy, & Allen, 2020).

When accessing accommodation from the private rental sector, refugees can apply for the Housing Assistance Payment (HAP) to assist them in financing long term housing tenancies. Under the scheme, one must be on the local authority's housing list while sourcing their accommodation (The Dublin Region Homeless Executive, 2014). When a tenancy is secured, the refugee will contribute a weekly payment based on one’s earnings to the local authority while the remaining rent fee is subsidised by the local authority (Citizens Information Board, 2021). Even with this additional financial support from the state, refugees struggle to source their accommodation for several reasons. Firstly, HAP has been found to act as a deterrent for potential landlords, as was experienced by the migrants in Threshold's research into the Irish private rental sector (Byrne & McArdle, 2020). Although it is illegal for landlords to discriminate against tenants on the basis of receipt of rent supplement or HAP, landlords “are entitled to seek a market rent for the property and rent supplement/HAP do not always cover this” (Threshold, n.d). Secondly, many migrants have expressed their experience of discrimination and racism when trying to obtain private accommodation, causing further difficulties to avail of housing when competing against their native Irish counterparts who too need housing (Crosscare Refugee Service, 2018). Thirdly, as mentioned above, asylum seekers face difficulties in finding work, resulting in a lack of economic independence. Another issue restricting asylum seekers from accessing housing was their exclusion from opening bank accounts until April 2021 (2021), despite a European Directive that confers this right to asylum seekers and which was transposed nationally by Ireland since 2016.² Their minimal credit and employment history have also acted as barriers to accessing affordable private accommodation (McGinley & Mutwarasibo, 2009). Fourthly, for the reunification of families, administrative paperwork like family member's Personal Public Service number and Irish Residence permits must be completed before receiving HAP (Crosscare Refugee Service, 2018).

Unfortunately, the accommodation options discussed above are not always successful routes for sourcing individual accommodation. Many migrants can become undocumented as a result of different circumstances; such as “workplace exploitation, victims of domestic violence or trafficking, and failed asylum seekers who cannot be removed from the State” (TSA Consultancy, Focus Ireland, 2012, p. 31). This group tends to make up the “majority of users of homeless services” (2012, p. 37) due to their inability to access social welfare. Homelessness can be an unfortunate outcome even for asylum seekers who have already secured individual accommodation outside of the DP centre. The primary factors causing homelessness found in Focus Ireland’s and the Immigrant Council of Ireland’s research study (2012) were failure to maintain employment and sustainable income flow. Secondly, because asylum seekers are excluded from the ‘Habitual Residence Condition’ (2020), when they are at risk of or are experiencing homelessness, they cannot access mainstream payments or services for additional support (TSA Consultancy, Focus Ireland, 2012). Thirdly, asylum seekers are not included in the Department of Housing’s official homeless figures, even though they are “effectively homeless” and those who hold the right to reside are “stuck in Direct Provision” (Ryan, 2021). Their exclusion distorts the reality of the actual housing units in demand (Ryan, 2021), which can impact the distribution of social housing.

²European Union (Payment Accounts) Regulations 2016, Official publication: Iris Oifigiúil ; Publication date: 2016-09-20, <https://eur-lex.europa.eu/legal-content/en/NIM/?uri=CELEX:32014L0092>

White Paper Accommodation Models

The following information is extracted from the Irish Government's 'A White Paper to End Direct Provision and to Establish a New International Protection Support Service' (Department of Children, 2021). The proposed model aims at abolishing the current DP system through a new two-phase accommodation system.

Principles of the Model

- Integration from day one: The new model will emphasise supporting people to live independently in Ireland, with applicants offered health, housing, employment, and education supports at the Reception and Integration Centres.
- Human rights and equality-based: The rights of applicants will guide the delivery of the model, with a particular focus on children's rights, dignity, respect and privacy.
- Delivery of high standards: The new model will be one characterised by high standards of support, services and assistance.
- Professional: Understand equality, diversity, cultural competence and the particular needs of those who have experienced trauma and are fleeing conflict. Staff will be required to receive cultural competency training regularly.
- Community engagement: Communities and not-for-profit organisations will be actively encouraged to become engaged in supporting applicants and their families at each stage of the process.

Phase 1

All applicants should be initially accommodated in a Reception and Integration Centre for a period of four months after entrance into Ireland. Six Reception and Integration Centres are planned to be established and State-owned. A new consultation process should be undertaken with relevant communities when locating a Reception and Integration Centre in a particular location. In total, the Centres will need to have the capacity to accommodate 2,000 people, across the country, at any one time. All accommodation in 'Phase 1' should be own-door for families and own-room for single people, with specific adaptations for people with identified vulnerabilities. Women-only accommodation should be available for female applicants who have experienced gender-based violence and who need ongoing psychological support. Specific accommodation is planned to be provided for both female and male victims of trafficking. Vulnerability assessments are said to be carried out to determine accommodation and service needs. Specific attention should be placed on the needs of children entering the system. While in the Reception and Integration Centre, applicants should have access to an onsite food hall. Residents should be involved in decisions around which food is provided in the food hall, with particular consideration given to any specific religious or cultural needs. They should be able to use a communal kitchen to cook for themselves. Once the time limit to reside with these centres is reached, asylum seekers should be moved to new accommodation. All staff working with International Protection applicants are planned to receive cultural sensitivity training to develop their cultural competence. They should receive equality and human rights training as well as on engagement with asylum seekers who deal with trauma or have experienced torture. They should also undertake the 'Children First' e-Learning programme, which will help them recognise concerns about children and about how to properly report these concerns. Staff are planned to be required to sign a Code of Conduct. Applicants should continue to receive a bespoke allowance while in the Reception and Integration Centre, similar to that currently provided for people in International Protection Accommodation Service (IPAS) accommodation. Applicants should be entitled to apply for permission to access the labour market after 6 months from the date of application for International Protection. As applicants with disabilities may face barriers in accessing employment opportunities, a particular focus is planned for linking the applicant with employment services targeted at people with disabilities will be in place. Applicants should be able to apply

for a drivers licence as well as open a bank account. The availability of suitable services, including accessible transport services, and school places should also be taken into account for applicants with disabilities and for families who have children with additional educational needs.

Phase 2

The Housing Agency is planned to partner with and support The Department of Children, Equality, Disability, Integration and Youth (DCEDIY) in addressing the housing needs of applicants for International Protection. The location and number of applicants to be accommodated in each county is planned to be determined according to a National Settlement Pattern that will be developed by the County and City Management Association, in cooperation with the DCEDIY. It should take account of applicant needs, population density, housing need and availability of relevant public services in each county. The AHBs or other providers should source and finance this housing separately from any social housing that they are providing for Local Authorities. This option should be used for families and single people, particularly vulnerable single people. Private tenancies should be used to source accommodation for families as necessary. All accommodation in Phase Two is planned to be own-door, self-contained houses or apartments for families. Where a family is deemed vulnerable, they should receive social care and integration supports through the NGO-managed strand. Where a family is not deemed vulnerable, their tenancy should be managed by the AHB. The family should pay rent for the accommodation on the same basis as an Irish citizen living in social housing. This means that the rent they pay will be based on their income (including their weekly International Protection Payment as well as any earned income), not on the rental value of the accommodation.

Single people are planned to be housed in either own-door or own-room accommodation. Buildings should be repurposed through urban renewal initiatives to create accommodation for single people. Financial support is said to be provided by the State for the refurbishment of properties to an appropriate standard. In exchange for this support, the property owner agrees to make the property available for International Protection applicants for a minimum period. Rent is planned to be paid directly by the State, with the tenant paying a rent contribution. It is estimated that approximately 75 units would be needed, assuming that approximately 10 single people would share in an individual restored property. Applicants who rent suitable accommodation within the Local Authority Area to which they are assigned should have their rent (up to an agreed level) paid directly to the landlord by the State. The applicant will in turn make a rent contribution to the State, based on their means. This system will operate similarly to HAP.

'Rent a room' schemes are planned to be used to source some of the accommodation for single people. A property owner opts to host an applicant (individual or family) in their own home. This can be on a pro bono basis or similar to the rent-a-room scheme operating for students. The State have said they will match applicants with hosts and carry out a monitoring and support role for the duration of the hosting arrangement. The current system of resettlement workers and intercultural workers that are appointed under the Irish Refugee Protection Programme to support refugees in specific counties is planned to be expanded. It should encompass applicants where the accommodation option does not include tailored supports provided by not-for-profit organisations. When moving into Phase Two accommodation the applicant should receive an income support payment from the DCEDIY at a rate broadly similar to the Supplementary Welfare Allowance if they have not yet entered employment, or if their wages are below a threshold. Applicants with children should also receive a child support payment. Community healthcare teams should develop a comprehensive and efficient model of care for applicants for International Protection. The teams should include GP services, nursing and health worker services, interpretation and NGO supports, and specialised healthcare such as dentistry, psychology, and referral to mental health services (for Adults and 'Child and Adolescent Mental Health Care' CAMHS) based on assessment. Where applicants have mental health needs, they should be referred to healthcare professionals with relevant experience, and this should be done in a culturally sensitive manner with appropriate

interpretation services. Once this assessment has been carried out, the appropriate community-based care should be initiated and all relevant information will be promptly communicated to mental health services. No further information has been given to provide detail on what this 'appropriate community-based care' will entail. Where further vulnerabilities emerge following initial screening and assessment, the assigned caseworker should notify appropriate services and will arrange for further assessments to be undertaken as necessary.

Current Concerns with the White Paper Proposals

The White Paper has been positively received by many public organisations (TD, 2021; MASI, 2021; Children's Rights Alliance, 2021; Irish Human Rights and Equality Commission, 2021; DePaul, 2021; ISPC, 2021; LGBT Ireland, 2021; Amnesty International, 2021; Doras: Protecting and Promoting Human Rights, 2021; NASC: Migrant & Refugee Rights, 2021; Ombudsman, 2021; Irish Refugee Council, 2021; Trust, 2021; Immigrant Council of Ireland, 2021). Many have observed a "notable shift in policy" (2021), with a primary focus on the promotion of human rights (2021), individualistic support systems, integration (2021) and a divergence from the traditional approach of a congregated setting (Ombudsman, 2021). However, concerns remain. This next section will discuss some primary accommodation-related concerns as expressed by several organisations working in the area of homelessness and migration which were consulted for this paper or who wrote on the subject. These include phase one time limits, housing supply, shared housing management, human rights violations and housing allocation management.

In terms of 'Phase One', the government will impose a 4-month limit on an applicant's stay in a Reception and Integration Centre (Department of Children, 2021) aiming to ensure a temporary stay in the system. Nonetheless, organisations like MASI (2021) and Sinn Féin (2021) have highlighted how there is no legislation cementing any of these changes, such as the 4-month limit. Sinn Féin is concerned that many will remain for longer than 4 months "if there isn't a front-loading of the capital investment in own door accommodation and an accelerated delivery of these" (TD, 2021). With no legal obligation to terminate an applicant's stay in Phase One accommodation upon reaching the time limit, the proposed system will not be able to guarantee the full dismantle of DP, as asylum seekers will continue to remain trapped in a shared facility. Unfortunately, as discussed above, Ireland is currently experiencing a housing crisis, with a short supply of affordable housing. This has trapped many who have 'leave to remain' within the system of DP, as mentioned by 'The Journal's human rights issues and gender equality journalist Órla Ryan (2021). Sinn Féin expresses concerns about the government's failure to address this issue and the future of those trying to avail of affordable housing post phase one (TD, 2021).

Numerous concerns relating to 'Phase Two' have been brought to light. Firstly, the accommodation model proposed for single people aims to provide autonomy and privacy through own-room accommodation within a shared housing unit (Department of Children, 2021). Eradicating DP accommodation includes removing the congregated setting of DP, which as MASI (2021) confirms, this model has not achieved due to sharing living spaces such as kitchens, bathrooms etc with ten other individuals. DePaul (2021) reiterates this point, stating there is still a possibility that single person accommodation will maintain the institution-like living arrangements found within DP centres. Additionally, MASI (2021) and DePaul (2021) have raised concerns regarding the management style within this model, such as the expectations of shared en suite accommodation and balancing independence with care and support for individuals, as well as the potential for one's human rights to be infringed upon if a proper management system is not in place. If no system as such is implemented, there's an opportunity for serious health and safety concerns to be left unreported, as was witnessed by the Ombudsman for Children's Office in current DP centres (Dwyer, 2021). MASI (2021) concludes this model will not guarantee the right of asylum seekers to privacy will be upheld. Secondly, in regards to the proposed hosting model, MASI highlights how a dearth of guidance on the functioning of the relationship between the host and asylum seekers have the potential to produce abusive relationships (2021), similar to that found in DP. Thirdly, the Housing Agency (2021) and DePaul (2021) have alluded to the issues associated with the management of housing

allocation. DePaul has expressed concerns as to how competing demands for housing between marginalised groups such as the homeless and the asylum seekers are to be resolved. Amnesty International (2021) also acknowledge the potential tension that could arise between these two groups as a result of the housing crisis. As well as that, the Housing Agency's Julie Davis (2021) extends on this point, highlighting the issue of how to fairly balance an applicant's choice for location against availability when distributing accommodation.

Discussion

The Irish Government's White Paper is fuelled by an ambition to end the DP system. Through the establishment of "a new International Protection accommodation policy centred on a not-for-profit approach... [and] on a human rights approach; with key supports geared towards ensuring integration with independence" (2021, p. 28), this outcome is hoped to be achieved.

Since the publishing of the Government's strategic plan in February 2021, public concerns about the potential success and drawbacks have flourished, while the new system remains at its embryonic phase. The following chapter further contributes to the ongoing public debate, delving deeper into the issue of housing possibilities and building on experiences from 3 sources of expertise on the topic of homelessness, as described in the methodology. Across all interviews, the White Paper was found to demonstrate "*a sizerment shift in thinking*"³, with the proposed policy focusing on a "*not for profit approach, protect[ing] and promot[ing] human rights ... definitely more to a larger degree than the current system*"⁴. However, it could not be denied that flaws lay within it. This is partly credited to the International Protection system's restrictive nature, explained as allowing migrants to arrive at the border and immediately being "*stripped of all their rights...then hav[ing] to earn them back*"⁵. More evidently, the paper's "*challenging and multi-department approach*"⁶, comes out as the primary factor for creating a reasonable bout of uncertainty regarding the future of the new system.

The chapter will proceed with a discussion on the issues related to housing supply, the functionality of social housing, social assistance and private rental sector models, the promotion of independence and equality and will conclude by formulating alternative suggestions and recommendations for contributing to a real change in the new Irish asylum system (particularly referring to the accommodation component).

Housing Supply

It is well known that Ireland is experiencing a serious shortage in affordable housing supply. The effects of this shortage are visible within the current DP system, where "*there are another thousand asylum seekers who they can't even accommodate in DP cause its full, in hotels and B&Bs as well*"⁷, and who are essentially "*living in homelessness*"⁸. Housing supply, or the lack of adequate housing, is a primary concern regarding the transitioning process to the new accommodation models.

When faced with a shortage of accommodation in 2000, the government turned to alternative methods of housing such as 'Flotels', as stated by Hilliard (2019). O'Sullivan⁹ describes these alternative methods amidst housing constraints as "*band-aids*" to homelessness rather than solutions, because of their inherent short shelf

³ Interview conducted with DePaul for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

⁴ Interview conducted with DePaul for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

⁵ Interview conducted with Wayne Stanley for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

⁶ Interview conducted with DePaul for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

⁷ Interview conducted with Eoin O'Sullivan for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

⁸ Interview conducted with Wayne Stanley for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

⁹ Interview conducted with Eoin O'Sullivan for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

life. An improvement in the proposed new system is that this is founded on the idea of providing own-door/own room accommodation, straying away from these temporary solutions. However, the housing crisis remains. What will happen if the availability of these models is in a deficit? Is it possible accommodation models could revert to a band-aid-like structure? Unfortunately, as O'Sullivan¹⁰ reflects, *"in the absence of a supply of housing we are constrained in what we can deliver on"*. If this were to be the case, it could cause further inflation of homelessness amongst refugees. Although many may argue these temporary accommodation models are better than nothing at all, Stanley¹¹ concludes that they only prolong the issue at hand as they are not the answer to homelessness, *"they are a continuation of it"*.

A second concern relates to the management of simultaneous housing provision to the homeless population and the refugee population. As previously mentioned by Crowley (2020), International Protection applicants are not included within the national homeless numbers. Therefore, their housing provision will be managed separately from that of the homeless category. Theories have arisen around the potential for this concurrency to create a *"competitive[ness]"*¹² between the two groups. Amnesty International (2021) have alluded to this competitiveness and its ability to damage relations between the two groups. This risk was also acknowledged by several of the interviewees who discussed the idea of a felt competition springing out of this system. Considering the fewer number of refugees in need of housing in comparison to the national citizens experiencing homelessness, it is a concern expressed by O'Sullivan¹³ that a rhetoric of animosity could develop amongst certain groups within society when housing allocation begins, such as *"why are these 'foreigners' getting houses before Irish people"*. Even though Stanley clearly states that *"they can't compete...they can't compete with native Irish people who have employment"* because of the racial discrimination present within the employment and housing sector, asylum seekers in need of housing are still going to be perceived as a *"threat"*. In light of the increase in racism towards the refugee population during the pandemic period, as referenced by Murphy (2021), it is not unimaginable to consider this allocation system to be another cog in the wheel fuelling racism and discrimination directed towards this group. As attested by Stanley¹⁴, *"the allocation of scarce resources and the politics of that is always tricky"*.

The geographical location of accommodation has been said to encroach on refugees work opportunities (2021) and social integration (2020). This issue holds relevance regarding the new system. According to the White Paper (2021, p. 29), one's designated location of residence will be determined *"according to a national settlement pattern... that will take account of applicant needs, population density, housing need and availability of relevant public services in each county"*. The diverse needs of refugees are to be taken into account when their area of residence is to be deliberated but it is questionable how much power a refugee will hold within deciding where exactly they are going to live. The White Paper (2021) briefly mentions that refugee preferences in terms of accommodation location will be consulted and taken into consideration, but exactly how weighted is that consideration? Are they provided with several choices? These questions remain unanswered and have been voiced as a concern for DePaul. DePaul¹⁵ believes that the *"idea of controlling people and placing them"*

¹⁰ Interview conducted with Eoin O'Sullivan for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

¹¹ Interview conducted with Wayne Stanley for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

¹² Interview conducted with DePaul for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

¹³ Interview conducted with Eoin O'Sullivan for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

¹⁴ Interview conducted with Wayne Stanley for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

¹⁵ Interview conducted with DePaul for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

here and there” is “*disruptive*” for the resettlement and integration of refugees within their new community. Without having full autonomy to choose where they want to live, their human rights are essentially restricted.

Operation of Social housing, Social Assistance and Private rental sector Models

The new International Protection system intends to provide the opportunity for refugees to avail of social housing through AHB, paying a means-tested rate of rent to the state while the government is responsible to subsidize the remaining total to the landlord (Department of Children, 2021). On a positive note, DePaul¹⁶ hopes the management separation of allocating social housing to refugees and the homeless could improve the waiting period for refugees as they would all be “*prioritised*” rather than adding them to “*the bottom of the [homeless] list cause they’d all be newly homeless*”. However, there is still the issue of a long waiting list (2018) as a result of the housing crisis (Ryan, 2021). Therefore, this system would only be advantageous for the refugees if the supply of social housing was to drastically improve. The lack of supply could be credited to the nature of the social housing system itself. Because of a lack of financial possibilities, people have a hard time to exit the social housing, meaning that these accommodation units become permanent/long term housing. As DePaul states “*We live in a country where social housing is for life. Why does it have to be for life?*”¹⁷. Additionally, O’Sullivan¹⁸ believes this model is limited in its success as “*the output [of housing supply] from local authorities and approved housing bodies are going to be pretty small for the next couple of years.*”

According to the new proposals, a form of social housing support, similar to HAP, should be made available to refugees who source their private accommodation (Department of Children, 2021). The inclusion of such a payment provides more freedom for refugees to source their accommodation according to their individual needs and preferences. It could also improve their chances of successful integration as it removes the “*concentrated*”¹⁹ setting found in most blocks of social housing. On the other hand, organisations like the Irish Refugee Council (2021) have previously acknowledged the financially consumptive nature of using HAP over extended periods. O’Sullivan²⁰ reiterates this problem. Therefore he expects a reliance on HAP “*in the short to medium term*” but a transition to “*a mixture of HAP and approved housing body and local authority*” for the implementation of the new accommodation models. Another current issue associated with HAP is that “*a lot of landlords don’t want HAP tenants*”. This is an important discussion which relates to the role of the private sector in providing accommodation for refugees which should be analysed in more depth in order to ensure the changes proposed by the new system will actually be achieved. For years “*rightly or wrongly they’ve [the private sector] been the only show in town*”²¹, its acting principal role within the area of housing refugees is conflictual for several reasons. The main issue with its extensive use lies at its core, “*it’s a for-profit sector, it’s always looking at a margin and trying to create a margin*”²². Landlords rejecting tenants due to them receiving HAP was proven to be the reality for migrants receiving HAP in Threshold’s research (Byrne & McArdle, 2020). Considering the new system is to provide a similar payment to refugees, little information has been published

¹⁶ Interview conducted with DePaul for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

¹⁷ Interview conducted with DePaul for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

¹⁸ Interview conducted with Eoin O’Sullivan for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

¹⁹ Interview conducted with Eoin O’Sullivan for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

²⁰ Interview conducted with Eoin O’Sullivan for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

²¹ Interview conducted with DePaul for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

²² Interview conducted with DePaul for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

to explain how this issue is to be resolved if and when this should occur. Although *“the housing assistance payment ... has the advantage of ... end[ing] direct provision”*²³, this resistance exhibited by landlords could continue to be an obstruction for refugees in sourcing private accommodation and exiting the International Protection system.

Promotion of Independence and Equality

Two accommodation models are causes for concern amongst the interviewees in relation to obtaining independence and equality for asylum seekers. Firstly, for single people, the White Paper states that each person will be provided with own-room units within a housing unit, shared by 9 others, all people waiting for their asylum claims to be processed (Department of Children, 2021). Although a step in the right direction, O’Sullivan²⁴ struggles to comprehend *“Why, because you’re an asylum seeker, why do you [the government] think it would be ok [for them] to share a house with strangers?”*. This reiterates O’Sullivan’s previous point of ‘band-aid’ type of solutions being provided to those, who Stanley described, as having their right to independence stripped. This solution of a shared accommodation space could have the capability to reinvent the institutional nature of DP under the guise of independent living, while maintaining its institutionalism. This worry was also communicated by DePaul (2021) and MASI (2021). If an institutional setting still remains within the new accommodation options, refugees will not be able to achieve living independently and could have their rights and equality furthered impinged on. Additionally, although some refugees may *“need the support of a congregated setting... It’s a smaller proportion”*²⁵ of people who need it in comparison to those who do not. *“Own room does not promote full independence”*²⁶. Thus, many refugees will continue to be at risk of having their independence restricted, which would then violate one of the White Paper’s main objectives of *“Human rights and equality”* (Department of Children, 2021, p. 41). As well as that, DePaul²⁷ reflects on the increased opportunity to racially abuse this cohort of individuals as *“it’s easier to stereotype and put labels on this cohort of people and not to view them individually”* as a result of their congregated living quarters.

Secondly, the hosting scheme applicable to both single people and families (2021) raised several concerns for the research participants. On the one hand, the informal nature of the housing environment itself can create difficulties in terms of the relationship between host and guest. O’Sullivan compares this arrangement to a similar ‘rent a room’ scheme currently in use in the homeless services. He states *“it’s not very popular and a lot of households do it, usually to help them pay off their mortgage in their early stages but they don’t want somebody else living in their house”*²⁸. The mental health effects on refugees from living close to others with whom they are in potential conflict has already been identified as a primary concern resulting from shared accommodation (2020). Considering this consequence, the possibility for conflicting relationships to transpire from this scheme is a very real concern. Furthermore, this possibility is even more troubling for DePaul when refugees find themselves in need of raising issues with their landlords. If the relationship is *“not well defined or*

²³ Interview conducted with Eoin O’Sullivan for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

²⁴ Interview conducted with Eoin O’Sullivan for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

²⁵ Interview conducted with DePaul for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

²⁶ Interview conducted with DePaul for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

²⁷ Interview conducted with DePaul for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

²⁸ Interview conducted with Eoin O’Sullivan for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

*maybe well-established... you can ...feel ... reluctant to raise issues*²⁹. This program may continue a distressing pattern scene in DP centres of refugees entrapped in tightly bound relationships of dependence on their superiors, “effectively gag[ing]” them (Dwyer, 2021). On another note, DePaul explains the complexity of carrying out such a scheme professionally and successfully. *“You have to access a person’s home to ensure that they have a spare room. You need to train people ... how to host somebody...you may have people with trauma ...that can be very hard for a host to deal with. I think there’s a vetting element to it, engaging people, training them, allowing them to understand what’s expected of them and spend time with people”*³⁰. Understanding the meticulous detail involved in running such a scheme, DePaul is sceptical as to *“how much of that will be done”*. If each of these steps were not followed through, there could be serious *“deficits”* with this model.

Finally, the White Paper acknowledges that some refugees accommodation needs may change over time whilst passing through the International Protection system (Department of Children, 2021). However, the solution provided to address these changes is to designate certain accommodation strands to those with higher support needs. Organisations like The Housing Agency (2021) have previously raised concerns regarding how to address this issue. Stanley too fears for how changing needs will be indulged. As a result of refugees essentially *“growing up in direct provision... you do have changing family circumstances all the time”*³¹. Therefore, if initial accommodation no longer meets the needs of all accommodated, will there be a system in place to intercept and adapt the situation to meet the new needs of all involved? This question remains unanswered. If living arrangements are not adapted to align with evolving needs, refugees may continue to feel trapped within inhumane conditions, like those involuntarily stuck within DP centres (TD, 2021).

²⁹ Interview conducted with DePaul for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

³⁰ Interview conducted with DePaul for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

³¹ Interview conducted with Wayne Stanley for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

Conclusion

The publication of the White Paper has given many a new sense of hope as it symbolizes the culmination of the current DP system. Although its conception was meant to be based on inclusion, the current system can create a feeling of *“being outside of Ireland while in it”*³² for those who pass through DP. Therefore, the new system signifies a move away from exclusionary methods to a focus on promoting human rights and integration.

However, as progressive as it may appear, many aspects of the paper have cast doubt over its prospects of success of which the government and the implementing agencies need to be aware and prepared to avoid such scenarios. This paper brings forward the main concerns related to ensuring adequate accommodation for those in a process of requesting asylum and after being conferred with an international protection status. Firstly, the proposed accommodation models are sorely welcomed but their implementation poses a worry for some. The housing crisis still pervades the market and there lacks enough supply of affordable housing, especially social housing. The small stock of social housing could be a result of the long term dependence that the social housing system nurtures. To deter further dependency and resulting indirect supply shortage, a model that encourages tenants achieve economic independence while providing the necessary support was proposed by some of the organisations consulted for this paper. However, if affordable housing supply does not drastically improve, these proposals will struggle to come into existence as the *“issues for people in direct provision are the same for people outside of direct provision when it comes to housing and housing supply”*³³ even with a new government plan in place. The construction of more social housing was advised by the interviewees. This could be done through funding models combined of state funding and private investment. Additionally, the private rental market should be made more attractive to asylum seekers.

Secondly, the allocation of scarce resources can cause rifts between those who are in need. With that being said, the separation of housing lists for asylum seekers and the homeless is a worry for many because of the potential for it to foster discriminatory and racist public rhetoric’s. Some members of the public may view the asylum seekers as being prioritised once the provision of housing begins. The allocation system proposed is *“not that simple, but for some people it is.”*³⁴ Therefore, for the successful transition to the new system, public perception of and attitudes toward asylum seekers need to be targeted for the improvement of their integration. As Stanley states, *“it isn’t a migration crisis, it’s a political crisis.”*³⁵ As they are unofficially deemed homeless, it was proposed for asylum seekers to be retrospectively added to the homeless list. Furthermore, smaller accommodation units will help to diminish the stigma and stereotypes attached to the setting of congregated housing.

Thirdly, the location of an asylum seekers’ residency has proven to have an immense impact on their quality of life. To fully promote their human rights, asylum seekers should be given full autonomy on where they chose to live. However, a foreboding feeling remains regarding the level of consideration that will be given to these preferences. Will they have the freedom to choose where they live or will they continue to be controlled and

³² Interview conducted with Wayne Stanley for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

³³ Interview conducted with Wayne Stanley for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

³⁴ Interview conducted with Eoin O’Sullivan for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

³⁵ Interview conducted with Wayne Stanley for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

displaced? To avoid this, it was suggested that each asylum seeker should be allowed to put forward two areas they would prefer and these areas to be considered when allocating housing.

Fourthly, the provision of a HAP-like state subsidy will allow asylum seekers to source accommodation from the private rental sector while aligning their accommodation to their needs. However, it has been proved that extended usage of systems like HAP is not financially sustainable in the long term. As well as that, many landlords reject asylum seekers as a result of receiving HAP payments. Thus, ensuring better secure of tenure for asylum seekers is a recommendation for the government to tackle this issue. Moreover, the role of the private sector within this system should be reduced, with more of a focus put on encompassing a social element into the provision of housing.

Fifthly, own-room accommodation is said to be a push in the right direction for homeless services, while sharing a housing unit with 9 strangers can still maintain an institutional environment. To combat this, a further push towards complete independent living for all is suggested, or even a reduction in the number of asylum seekers allowed to share a housing unit.

Sixthly, the hosting scheme is said to be inherently risky due to its informality. The possibility for abusive relationships to evolve is considerable. Also, the preparation involved in bringing to life such a scheme is colossal. For this scheme to work effectively, it would need to be well regulated as well as establishing some sort of rental agreement.

Finally, the own-door proposal is the most welcomed, for it is “*fundamentally a housing-led housing first approach.*”³⁶ Nonetheless, what is to happen if/when there is a change in individual needs or relationship breakdown? The interviewees worry whether changing needs will be accommodated and if so, how? Including some sort of modularity to the accommodation was suggested so that the housing unit could adapt to the new circumstances without forcing any members into homelessness. Additionally, the incorporation of a tenants and sustainment’s support service could help to prematurely identify any changing needs and avoid any future difficulties as a result.

To conclude, the White Paper has been widely well received and appreciated for its forward-looking approach but ultimately up until this point the it has just “*set aspirations.*”³⁷ Only with time we will be able to judge the true success of the new International Protection system for asylum seekers in Ireland. To avoid a repetition of the history and for ensuring that the new proposed system does deliver for those in need while respecting their fundamental rights, FEANTSA and its members in Ireland raise awareness through this paper on the issues that should be considered in designing further action plans for the country’s asylum system.

We strongly believe that at the basis of any successful integration lays the issue of housing which acts as a gateway to securing access to the labour market, to education and training and eventually an overall inclusion in society. Particularly in the case of migrants, asylum seekers and refugees, authorities should pay special attention when designing responses for housing as there are many aspects to be take into consideration. The proposals laid out in this paper are a starting point for reflection on what are the pitfalls of the new proposals

³⁶ Interview conducted with DePaul for the purpose of this paper on 19/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

³⁷ Interview conducted with Wayne Stanley for the purpose of this paper on 13/07/2021, Recorded and transcribed by Aisling Slein, Dublin, Ireland.

on accommodation of the White Paper and the recommendations formulated aim to contribute to improving the situation on the field for those looking for asylum in Ireland.

Alternative Suggestions and Recommendations

This paper has reviewed the criticisms received by the White Paper since its publication and has analysed in depth the proposals concerning the housing component, aiming at identifying potential risks to successfully transforming the asylum system in Ireland. Based on the experiences of the interviewees and civil society members, we bring forward a series of recommendations that aim at contributing to this purpose:

National Homeless Numbers:

- Adding refugees to the social housing list retrospectively to more accurately gauge the need for social housing.

The geographical location of accommodation:

- Designing a system which allows refugees the freedom and independence to choose the geographical location of accommodation and to create an obligation for local authorities to include them in policies and support their integration in the new community. For example, each individual could be allowed to present two areas where he/she would like to reside, at the end of their protection period.
- 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 (Irish Refugee Council, 2021).
- The location of the Reception Centres should be based on the National Planning Framework: Project Ireland 2040, which has identified five major cities: Dublin, Waterford, Limerick, Cork, Galway (Irish Refugee Council, 2021).

Developing the Social Housing system, by:

- Creating a model specifically for migrants, asylum seekers and refugees based on empowerment to exit social housing as soon as individuals are stabilized, and
- Creating a mixed model of social housing by making use of funding models for the development of social housing schemes such as Capital Assistance Scheme; one entirely funded through the state and the other being 60%/80% funded through private investment and the state; this is a model that could be adopted to build social housing and be multifaceted.
 - This point was reiterated by the Housing Agency; to review existing funding schemes for social housing and see how they could be replicated/modified to suit the requirements of delivering International Protection and accommodation (Irish Refugee Council, 2021).
 - As well as that, The Housing Agency state a response to new areas of activity for Approved Housing Bodies needs great consideration. Help is needed to expand supports without impinging on their existing systems (Irish Refugee Council, 2021).
- The Irish Refugee Council also suggest a homelessness prevention policy to be established for when the above accommodation paths do not suffice (Irish Refugee Council, 2021).

Private Rental Sector:

- To provide an adequate supply of housing and to provide refugees the equal opportunity to seek out their own accommodation.
- The role of the private sector in providing accommodation to refugees has been important along the years, but its role must be reduced and cannot be the only solution to ending homelessness.

- Set in place an effective property management piece to make sure there's an adequate supply, to monitor exits and maintain efficient turnaround times and 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 (Irish Refugee Council, 2021).
- The private rental sector needs to be made more attractive, especially to refugee families.
- A greater security of tenure needs to be ensured to refugees and members of the public.

Own-Room Accommodation:

- To continue the movement towards policy models that provide complete independent living to refugees as opposed to shared living or own room accommodation.
- Reducing the number of applicants per shared accommodation unit to below 10 people to remove a possible institutional element of this model.
- The own door, independent living models should be used to allow civil society to have a stronger voice against racist tones. The Housing Agency further extend on the importance of collectivity for the success of this new system; Buy-in from the community is needed in both phases. Without it, difficulties with integration will occur (Irish Refugee Council, 2021)

Hosting Scheme:

- This scheme needs to be well regulated, implementing either a group agreement such as a rental agreement or a licence agreement to avoid any potential abuses.
- Hosts should be prepared and trained to interact and properly communicate with people with trauma.

Own-Door Accommodation:

- Designing this accommodation model around adaptability and modularity is needed to consider changing needs and relationships; if a member of the household wishes to move on to alternative accommodation, perhaps closing off that part of the unit and providing it to a new family/person would be a more responsive solution to changing housing needs, while assisting the individual who wishes to move on and providing them with new accommodation (Irish Refugee Council, 2021).

Supports:

- A Tenants and Sustainment's support would be a better external support than a resettlement worker; they are important for the early identification of changing needs and the pivoting of related issues.
 - The Housing Agency also suggest that supports for families should be visible, easy to access and assist both local communities and their new residents (Irish Refugee Council, 2021).
 - Another recommendation made by The Housing Agency is for the role of the interagency groups in the new system; they could bring proposals to the table and liaising with social housing providers in areas to mitigate competition of property (Irish Refugee Council, 2021).

This paper was written by Aisling Slein, as part of her internship under the coordination of FEANTSA, November 2021. For further information on the report or FEANTSA activities please contact simona.barbu@feantsa.org.

Bibliography

- Amnesty International . (2021, February 26). *WHITE PAPER A REAL CHANCE AT ENDING DIRECT PROVISION AFTER 21 YEARS*. Retrieved from Amnesty International : <https://www.amnesty.ie/white-paper-ending-direct-provision/>
- Bonamini, C. (2021). *From Bad to Worse: Covid-19 Aggravates Existing Gaps in the Reception of Asylum Seekers*. Jesuit Refugee Service.
- Byrne, D. M., & McArdle, D. (2020). *Security and Agency in the Irish Private Rental Sector*. Threshold.
- Children's Rights Alliance. (2021, February 26). *White Paper marks the beginning of the end for the direct provision system*. Retrieved from Children's Rights Alliance: <https://www.childrensrights.ie/resources/press-release-white-paper-marks>
- Citizens Information. (2021, June 14). *Applying for local authority/social housing* . Retrieved from Citizens Information: https://www.citizensinformation.ie/en/housing/local_authority_and_social_housing/applying_for_local_authority_housing.html
- Citizens Information Board. (2019, July 18). *Accommodation for people granted refugee status or subsidiary protection or given permission to remain*. Retrieved from Citizens Information: https://www.citizensinformation.ie/en/moving_country/asylum_seekers_and_refugees/refugee_status_and_leave_to_remain/accommodation_for_refugees.html
- Citizens Information Board. (2020, July 29). *The habitual residence condition*. Retrieved from Citizens Information: https://www.citizensinformation.ie/en/social_welfare/irish_social_welfare_system/social_assistance_payments/residency_requirements_for_social_assistance_in_ireland.html#l760d6
- Citizens Information Board. (2021, May 18). *Housing Assistance Payment (HAP)*. Retrieved from Citizens Information: https://www.citizensinformation.ie/en/housing/renting_a_home/housing_assistance_payment.html
- Claudia Bonamini. (2021). *FROM BAD TO WORSE COVID-19 AGGRAVATES EXISTING GAPS IN THE RECEPTION OF ASYLUM SEEKERS*. Jesuit Refugee Service.
- Crosscare Refugee Service. (2018). *Reunified Refugee Families and Homelessness: Submission to the Minister for Justice and Equality*. CrossCare Migrant Project.
- Crowley, N. (2020). *Ensuring a Home for All: Using the Public Sector Duty to Improve Access to Housing and Homelessness Supports for Migrant Households*. Irish Human Rights and Equality Commission.
- Darwish, M. (2021, April 11). *Bank of Ireland is first to allow asylum seekers open accounts*. Retrieved from Independent.ie: <https://www.independent.ie/irish-news/bank-of-ireland-is-first-to-allow-asylum-seekers-open-accounts-40300985.html>
- Day, C. (2020). *Report of the Advisory Group on the Provision of Support including Accommodation to Persons in the International Protection Process*. Dublin: The Advisory Group.

- Department of Children, E. D. (2021). *A White Paper to End Direct Provision and to Establish a New International Protection Support Service*. Dublin: Minister Roderic O’Gorman.
- Doras: Protecting and Promoting Human Rights. (2021, February 26). *Doras welcomes Government White Paper on ending Direct Provision*. Retrieved from Doras: Protecting and Promoting Human Rights: <http://doras.org/wp-content/uploads/2021/02/Press-Release.Doras-welcomes-Government-White-Paper-on-ending-Direct-Provision.pdf>
- Dublin, T. C. (n.d.). *Trinity People Finder*. Retrieved from Trinity College Dublin: <https://peoplefinder.tcd.ie/Profile?Username=TOSULLVN>
- Duffy, R. (2021, June 8). *24 Emergency Accommodation centres for asylum seekers to be closed this year*. Retrieved from TheJournal.ie: <https://www.thejournal.ie/direct-provision-centres-3-5460800-Jun2021/>
- Dwyer, O. (2021, April 27). *Number of child safety failings in Direct Provision centres, ombudsman report finds*. Retrieved from TheJournal.ie: <https://www.thejournal.ie/ombudsman-children-direct-provision-report-5420931-Apr2021/>
- FEANTSA. (n.d.). *About US*. Retrieved from FEANTSA: <https://www.feantsa.org/en/about-us/secretariat>
- Focus Ireland. (2021). *Latest Figures on Homelessness in Ireland*. Retrieved from Focus Ireland: <https://www.focusireland.ie/resource-hub/latest-figures-homelessness-ireland/>
- Healy, S., Bennett, C., Murphy, M., Rogers, S., & Reynolds, B. (2021). WORK, UNEMPLOYMENT AND JOB CREATION. *Socio Economic Review 2021: Social Justice Matters 2021: guide to a fairer Irish society*, 119-139.
- Hennessy, Ó. (2021). *The Impacts of Covid-19 on Ethnic Minority and Migrant Groups in Ireland*. National Economic and Social Council.
- Hilliard, M. (2019, November 19). *Direct provision in Ireland: How and why the system was introduced*. Retrieved from The Irish Times: <https://www.irishtimes.com/news/social-affairs/direct-provision-in-ireland-how-and-why-the-system-was-introduced-1.4086552>
- IGEES Unit: Department of Justice and Equality. (2019). *Spending Review 2019 : Direct Provision: Overview of current accommodation expenditure*. Dublin: IGEES unit of the Department of Justice and Equality.
- Irish Refugee Council. (2021). *Implementing Alternatives to Direct Provision*. Dublin: The Irish Refugee Council.
- Irish Refugee Council. (2021, June 29). *Implementing Alternatives to Direct Provision Seminar, 17 June 2021*. Retrieved from Irish Refugee Council: https://www.youtube.com/watch?v=_w-A0rcpf4c
- Irish Refugee Council. (2021, February 26). *Press release: Irish Refugee Council welcome White Paper, focus now on implementation*. Retrieved from Irish Refugee Council: <https://www.irishrefugeecouncil.ie/news/irish-refugee-council-welcome-white-paper>

- ISPC. (2021, March 12). *ISPC welcomes publication of government White Paper on ending Direct Provision*. Retrieved from ISPC: <https://www.ispcc.ie/ispcc-welcomes-publication-of-government-white-paper-on-ending-direct-provision-2/>
- LGBT Ireland. (2021, March 01). *LGBT Ireland welcomes White Paper to end Direct Provision*. Retrieved from LGBT Ireland: <https://lgbt.ie/lgbt-ireland-welcomes-white-paper-to-end-direct-provision/>
- Loyal, S., & Quilley, S. (2016). Categories of State Control: Asylum Seekers and the Direct Provision and Dispersal System in Ireland. *Social Justice*, 69-97.
- Maria Hennessy. (2017, January 25). *The right to work for asylum seekers: Ireland's prohibition on employment*. Retrieved from European Database of Asylum Law: <https://www.asylumlawdatabase.eu/en/journal/right-work-asylum-seekers-ireland%E2%80%99s-prohibition-employment>
- MASI. (2021, February 26). *Statement on White Paper to end Direct Provision*. Retrieved from MASI: <https://www.masi.ie/2021/02/26/statement-on-white-paper-to-end-direct-provision/>
- McCarthy, C. (2021). *“Did we stop being human when we applied for asylum in Ireland?” An Institutional Analysis of the System of Direct Provision centring the Voices of Asylum Seekers*. Dublin: Trinity College Dublin.
- McGinley, S., & Mutwarasibo, F. (2009). *Making a Home in Ireland: Housing Experiences of Chinese, Indian, Lithuanian & Nigerian Migrants in Blanchardstown*. Migrant Council of Ireland and Focus Ireland.
- Miles, M. B., & Huberman. (2020). Fundamentals of Qualitative Data Analysis. In M. B. Miles, A. M. Huberman, & J. Saldaña, *Qualitative Data Analysis- A Methods Sourcebook* (pp. 106-158). Los Angeles: SAGE.
- Minister for Housing, P. a. (2018, March 22). *Housing Assistance Payment Eligibility*. Retrieved from Houses of the Oireachtas: <https://www.oireachtas.ie/en/debates/question/2018-03-22/294/>
- Mulhall, A. (2020). The Ends of Irish Studies? On Whiteness, Academia, and Activism. *Irish University Review*, 94-111.
- Murphy, F. (2021). Direct Provision, Rights and Everyday Life for Asylum Seekers in Ireland during COVID-19. *Social Sciences*, 1-12.
- NASC: Migrant & Refugee Rights. (2021). *Nasc welcomes the publication of the White Paper on Ending Direct Provision*. Retrieved from NASC: Migrant & Refugee Rights: <https://nascireland.org/news/2021/nasc-welcomes-publication-white-paper-ending-direct-provision>
- National Traveller Accommodation Consultative Committee. (2018, July 26). Retrieved from Department of Housing, Local Government and Heritage: <http://www.housing.old.gov.ie/corporate/organisation/partner-bodies/national-traveller-accommodation-consultative-committee>
- Nedeljkovic, V. (2018). Retrieved from Asylum Archive: <http://www.asylumarchive.com/>
- O’Sullivan, E., Reidy, A., & Allen, M. (2020). *Focus on Homelessness*. Focus Ireland.

- Ombudsman for Children's Office. (2020). *Direct Division*. Ombudsman for Children's Office.
- Ombudsman, P. T. (2021, May 11). *Statement on Direct Provision for the Joint Committee on Public Petitions*. Retrieved from Ombudsman: <https://www.ombudsman.ie/news/statement-on-direct-provi/>
- Raghallaigh, M. N., & Foreman, M. (2015). *Transitioning from Direct Provision to life in the community: The experiences of those who have been granted refugee status, subsidiary protection or 'leave to remain' in Ireland*. Irish Research Council and the Irish Refugee Council.
- Raghallaigh, M. N., Foreman, M., Feeley, M., Moyo, S., Mendes, G. W., & Bairéad, C. (2016). *Transition from Direct Provision to life in the community*. Irish Refugee Council.
- Reception and Integration Agency. (2010). *Reception and Integration Agency: Functions & Responsibilities*. Retrieved from Department of Justice and Equality: http://www.ria.gov.ie/en/RIA/Pages/Functions_Responsibilities
- Ryan, Ó. (2021, May 7). *Over 1,000 people with status to remain are stuck in Direct Provision as they can't find other housing*. Retrieved from Thejournal.ie: <https://www.thejournal.ie/how-many-people-in-direct-provision-have-status-to-remain-5430235-May2021/>
- Sarantakos, S. (2013). *Social research*. Basingstoke Palgrave Macmillan .
- Slein, A. (2021). A Paper on the Future of Ireland's Direct Provision System [Recorded by W. Stanley, E. O'Sullivan, & DePaul]. Dublin, Dublin, Ireland.
- Social Justice Ireland. (2019, March 19). > *Direct provision is inhuman, degrading, and increasingly unfit for purpose*. Retrieved from Social Justice Ireland: <https://www.socialjustice.ie/content/policy-issues/direct-provision-inhuman-degrading-and-increasingly-unfit-purpose>
- TD, P. D. (2021, February 26). *Direct Provision White Paper 'a positive step but more ambition needed' - Pa Daly TD*. Retrieved from Sinn Féin : <https://www.sinnfein.ie/contents/60015>
- The Dublin Region Homeless Executive. (2014). *How does HAP work?* Retrieved from HAP: Housing Assistance Payment: <http://hap.ie/howhapworks/>
- The Special Committee on Covid-19 Response. (2020). *Final Report Special Committee on Covid-19 Response*. Houses of the Oireachtas.
- Threshold. (n.d). *Can a landlord refuse to rent to me?* Retrieved from Threshold: <https://www.threshold.ie/advice/seeking-private-rented-accommodation/can-a-landlord-refuse-to-rent-to-me/>
- Trust, P. M. (2021). *Peter McVerry Trust Statement on White Paper to End Direct Provision and to Establish a New International Protection Support Service*. Retrieved from Peter McFerry Trust: https://pmvtrust.ie/news_and_media/peter-mcverry-trust-statement-on-white-paper-to-end-direct-provision-and-to-establish-a-new-international-protection-support-service/
- TSA Consultancy, Focus Ireland. (2012). *Homeless in my new Home: Migrants Experiences of Homelessness in Ireland*. Dublin: Focus Ireland and the Immigrant Council of Ireland.

Walshe, V., & Henderson, N. (2020). *“Powerless” Experiences of Direct Provision During the Covid-19 Pandemic August 2020*. Dublin: Irish Refugee Council.

Walshe, V., & Henderson, N. (2020). *“Powerless” Experiences of Direct Provision During the Covid-19 Pandemic August 2020*. Rethink Ireland.