

ENDING DIRECT PROVISION?

February 2021-September 2022: A review of
the implementation of the White Paper on
Ending Direct Provision



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Nasc
Migrant & Refugee Rights

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um Chearta an Duine
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Contents

EXECUTIVE SUMMARY	PAGE 02
INTRODUCTION	PAGE 06
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The White Paper on Ending Direct Provision: Over One Year On	PAGE 09
The Economic and Social Rights of Persons Seeking Protection: Work, Housing, Social Assistance & Protecting the Vulnerable	PAGE 16
Right to Work	PAGE 20
Right to Housing	PAGE 37
Accommodation for persons seeking protection with vulnerabilities, including trafficking survivors	PAGE 40
Annex: Table of Freedom of Information Requests and Records Released	PAGE 47

Executive Summary

The White Paper on Ending Direct Provision provides a partial roadmap to better respecting, protecting, and fulfilling the economic and social rights of persons seeking protection in Ireland. The right to work, right to housing, right to social assistance and rights of persons who are particularly vulnerable are examined in this report. In spite of the significant challenges due to Russia's invasion of Ukraine, and arrival of persons in Ireland entitled to Temporary Protection, implementation of the White Paper must remain a priority for Government and society. Even with the significant changed landscape since the publication of the White Paper, the premise of the White Paper remains accurate: the current direct provision system violates the economic and social rights of persons seeking protection. Based on an evaluation of Freedom of Information records available assessing White Paper implementation deliberations to between February 2021 and October 2022, this research report makes sixteen core recommendations:

Right

Recommendation

Right to work

Given that Phase Two housing (see below) is to commence within four months of a persons arrival in Ireland, it is recommended that entitlement to access the labour market be granted no later than four months. Preferably, the Day Report's recommendation, of access to the labour market after three months would be implemented.

The absolute exclusion of persons seeking protection from employment within the civil and public sector needs urgent reconsideration. It is recommended that the generality of such a restriction be removed, in particular within healthcare, departmental administration and further and higher education.

The DCEDIY should engage extensively with the Department of Social Protection to ensure access to employment supports are available prior to a person having an entitlement to access the labour market and after a labour market access permission is granted.

Right**Recommendation**

Right to housing

A clear and achievable timeline and progress update on the implementation of Phase One and Phase Two housing should be provided as a matter of urgency (if not already done so by the time this report is published).

Multi-year capital expenditure budgets for delivering on Phase One and Phase Two accommodation commitments are required as a matter of urgency. This would significantly enhance decision making processes on delivery of White Paper commitments.

A clear policy on dispersal for persons seeking protection needs to be recommended by the Programme Board, with oversight from the External Advisory Group. This should include (i) providing rationale for a decision on placement of a person seeking protection in a particular Reception and Integration Centre (RIC), (ii) the dispersal area offered for Phase Two housing (iii) consultation with the person/family. The basis upon which a person may request a review of the area they are dispersed to under Phase One or Phase Two should include a clear review/appeal process.

Acquisition of properties to date has been limited, even if this was focused on delivering the capacity envisaged in the White Paper (2,000 persons in Phase One and 3,500 persons in Phase Two). There is an urgency to commence a capital building programme or acquire properties. Significant planning needs to commence imminently to bring such a large number of housing options on stream.

It has been noted that there is potential overreliance on a small number of yet to be identified Approved Housing Bodies who may provide Phase One and/or Phase Two housing to persons seeking protection. It is essential, if this has not already occurred, that substantive engagement with Approved Housing Bodies commence to identify their capacity/expertise in providing such housing. Where Approved Housing Bodies indicate limited capacity to engage, then purpose built/acquired housing will be necessary.

Right**Recommendatio****n**

Right to housing

Detailed planning in light of current realities of increased numbers of persons seeking protection must identify human rights-based solutions to provision of accommodation that ensures dignity, privacy, autonomy and respect.

The rent contribution (differentiated rent) for Phase Two housing should be set nationally, so as to avoid discrepancies between local authority areas.

The delivery of Phase Two housing should not be premised on un evidenced assertions from policy makers regarding supposed concerns that people will not move on from RICs if Phase Two accommodation is available to them. Discourses on persons seeking protection as not wanting to pay differentiated rent, utilities, and do not want to cook for themselves dominated discourse on direct provision for over twenty-years.

Accommodation for persons with vulnerabilities

Immediate planning to deliver housing rights for persons seeking protection with vulnerabilities needs to be occur without any further delay.

There has been no engagement, based on FOI records made available, with potential non-governmental organisations who are identified as being responsible for delivering wrap-around supports. Engagement with non-governmental organisations must commence immediately.

Right to social assistance

The White Paper indicates a rights-based approach for entitlement to income maintenance supports. It is of deep concern that the commitment to review the rate of daily expenses allowance has not occurred since 2019, in particular post publication of the White Paper. There must be an immediate review of the levels of payment for Daily Expenses Allowance pre the full implementation of the White Paper. This is to ensure a person currently in direct provision accommodation for less than four months, who is legislatively prevented from working for six months, has access to a level of financial support that is appropriate.

Right**Recommendation**

Right to social assistance

DCEDIY, in coordination with DSP, should establish the key criteria for eligibility for International Protection Support Payment (IPSP) and International Protection Child Payment (IPCP). Given that the White Paper proposals are based on human rights approaches, after four months, a person should be automatically entitled to IPSP and IPCP where they otherwise meet eligibility and means test for entitlement. Where a person is not offered Phase Two housing, reasonable reductions to the IPSP should be no more than the differentiated rent payable, along with a reasonable contribution to heat/lighting, prepared meals etc.

Legal structures under the Social Welfare (Consolidation) Act 2005 (as revised) should be mapped onto IPSP and IPCP for: application, determining eligibility, means testing, review and appeal of decisions. A shadow application, eligibility, review and appeals system should not be created by DCEDIY. Such systems and expertise already exist within the DSP.

Introduction

In February 2021, Nasc, the Migrant and Refugee Rights Centre welcomed the publication of the White Paper on Ending Direct Provision (White Paper). Nasc's CEO at the time, Fiona Finn, described the White Paper as an "opportunity to radically transform the reception process in Ireland" and noted that "[t]he White Paper clearly and thoughtfully sets out how reception supports should be provided to people in the international protection process." We were optimistic that the White Paper provided a clear pathway to achieving the commitment in the Programme for Government of ending Direct Provision.

However, our experience of working on and advocating for implementation of reforms following the publication of the report issued by the Working Group to Report to Government on Improvements to the Protection Process, including Direct Provision and Supports to Asylum Seekers (McMahon Report) in June 2015, showed us the importance of having our own tools to monitor implementation and to hold the government to account. Nasc's shadow report, [Nasc Working Paper on the Progress of Implementation of the McMahon Report](#) showed that over one year on from publication of the McMahon Report, only 12% of recommendations could be verified as fully 'implemented'.

We were therefore delighted to receive funding through the Irish Human Rights and Equality Commission's Human Rights and Equality (IHREC) Grant Scheme 2021-2022 to monitor and examine the progress achieved in strengthening the social and economic rights for persons seeking international protection since the publication of the White Paper on Ending Direct Provision. Initially, we wanted to be able to provide an answer to the question, over one year on from the publication of the White Paper, 'have the economic and social rights for protection applicants improved?' It soon became very clear that the answer to this is a firm 'no'. Therefore, the desk based research pivoted to an analysis of progress to date on implementation of the White Paper.

IHREC funding allowed us to engage an experienced researcher, Dr Liam Thornton, to carry out desk research through extensive Freedom of Information Act 2014 (as amended) requests to identify successes and challenges in meeting Government commitments to implementing the White Paper and through which 16 recommendations have been identified. This part of the report was completed in late October 2022.

IHREC funding also allowed us to engage a peer researcher with lived experience of the international protection system to carry out qualitative research amongst those living in Direct Provision centres to find out the extent to which the White Paper implementation reflected the lived experience of persons in direct provision.

Dr Abayomi Ogunsanya carried out qualitative research amongst those living in Direct Provision centres to find out the extent to which the White Paper implementation reflected the lived experience of persons in direct provision. It was important to Nasc that the voices of international protection be foregrounded. The quotations provided in this report are the results of survey and focus group discussions that were concluded over a period of four months. Respondents of the survey and participants of the focus group were drawn from people with lived experience of Direct Provision, both current asylum seekers and others with statuses still living in the system. The survey, containing open-ended and multiple-choice questions, was made available in electronic form and distributed through multiple social media channels as well as through activist groups like MASI (Movement of Asylum Seekers in Ireland) and later through hard copies of the survey distributed directly in Direct Provision and Emergency Accommodation centres. Candidates for the focus group discussions were identified and recruited by Dr Ogunsanya using the snowball sampling method.

Dr Ogunsanya identified that there was a slow uptake of participation by international protection applicants and other direct provision residents. There were common complaints of weariness and 'Zoom fatigue' combined with an apathy towards research as direct provision residents felt themselves to be tired of being the focus of research attention. The living conditions in centres, in particular the lack of quiet spaces, made online participation in focus groups difficult and impacted on the ability to meaningfully contribute to the discussion. After three online focus groups, a decision was made to move to in person focus groups. Five further focus groups were held in person in accommodation centres. These centres reflected the main forms of international protection accommodation in mid-2022, namely the initial reception centre, an emergency centre and Direct Provision centres.

Research participants were informed of their rights as a participant prior to taking part and were asked to complete a consent form which reminded them that they were not obligated to take part in the research and could end their participation at any time. They were advised of their right not to answer any questions and their right to retract anything they said within a given framework.

The total number of research participants is 108. By way of context, in the first 6 months of 2022, there were over 10,000 new international protection applications made. We acknowledge that the qualitative research does not represent a statistically significant sample. It does however provide the human side of, what can at times seem like, abstract discussions on legal rights. The voices of those with lived experience of Direct Provision precede the discussion of each social, economic and cultural right considered.

In publishing this report we are mindful of the context of the dramatically changed environment created by the increase in new international protection applications in 2022 and the over 50,000 Beneficiaries of Temporary Protection who have fled the war in Ukraine and have now made Ireland their home. The Department of Children, Equality, Disability, Integration and Youth are now responsible for housing over 50,000 people. These increased pressures on accommodation have seriously impacted the government's ability to deliver on the commitments in the White Paper within the timeframe envisaged. It has also led to unprecedented crises in the reception of new international protection applicants. Forty international protection applicants were accommodated for over 15 weeks in tents in Kerry, only being moved as winter conditions made tented accommodation untenable. Tents continue to be used in Lissywollen Direct Provision Centre outside Athlone and on the site of Knocklisheen Direct Provision Centre in Clare. Sports facilities have been utilised for short-term emergency measures in Cork and in Abbottstown. At times, no accommodation has been available and newly arrived international protection applicants have been faced with street homelessness. Initial emergency reception centres have been criticised repeatedly for poor conditions with people sleeping on floors and chairs with very limited access to hygiene facilities.

There have also been some developments post the completion of this report. First, since late November 2022, the Programme Board minutes are now available up to July 2022. Second, Dr Catherine Day and the External Advisory Group have completed their one year review of the implementation of the White Paper. Dr Day has stated that it will not be possible to end the system of direct provision by 2024. In light of this, it must be strongly emphasised that many of the recommendations in this report can be implemented relatively swiftly if there is political will to end direct provision. While the 'housing piece' has become more challenging, a genuine 'whole of Government' push to implement these essential commitments is required.

Fiona Hurley
CEO, Nasc, the Migrant and Refugee Rights Centre
28 November 2022.

The White Paper on Ending Direct Provision: Over One Year On

Context

The system of direct provision for persons seeking international protection has existed for over twenty-two years. In February 2021, the Department of Children, Equality, Disability, Integration and Youth published the [White Paper on Ending Direct Provision](#). The White Paper on Ending Direct Provision proposes the abolition of the system of direct provision. A 'White Paper' is a firm commitment by government to commit to a course of action, although there are no sanctions if a government (including any new government that may be appointed) do not ultimately meet these commitments. Therefore, a White Paper is merely the commencement of a process, and significant activist and civil society pressure must be maintained to ensure commitments are met. Whether a government is progressing rapidly or slowly in implementing White Paper commitments can be a key indicator in assessing just how serious the commitments to end direct provision are.

The White Paper belatedly acknowledges that direct provision fails to "respect the dignity and human rights" of persons subjected to this system. The White Paper commits the Government to end the system of direct provision by mid-2024. A review of this timeline is now occurring, however [Minister Roderic O'Gorman has stated](#),

“...the implementation of the new model is and will continue to be a key priority for the department.”

The commitments in the White Paper were premised on numbers claiming international protection being around 3,500 per year. In 2021, [2,649 persons applied for international protection](#) in Ireland. In December 2021, the minutes of the Programme Board, responsible for advising on the implementation of the White Paper, stated that predicted numbers of persons seeking international protection were "[far in excess](#)" of the 3,500 applicants per year, that was the [planning assumption](#) in the [Day Report](#). It should be noted that in 2021 the number of persons seeking protection were 851 applicants below the Day Report assumptions. The [February 2022 Programme Board meeting](#) highlighted that the increases in

international protection applicants would potentially impact on meeting White Paper commitments, and this needed to be publicly communicated.

Between January and September 2022, around 11,500 persons applied for international protection. This increase has occurred during one of the most significant movement of peoples in Europe due to Russia's illegal war on Ukraine. Since Russia's invasion of Ukraine in March 2022, over 55,000 people have arrived in Ireland and are entitled to Temporary Protection. Under Irish law, persons with Temporary Protection status are entitled to enter employment, access social welfare and housing akin to Irish citizens. Over 44,000 persons with Temporary Protection to date have required housing. Persons seeking asylum, international protection applicants, have significantly different rights. The Government has consistently argued for two decades that, as persons whose claim for protection is under consideration, international protection applicants' status provided a basis for legitimate differentiation in entitlements to various rights regarding accessing employment, social welfare and housing (see Annex One). As Chief Commissioner of the Irish Human Rights and Equality Commission (IHREC), Sinéad Gibney, has reminded the Government,

“

...people in the direct provision system in Ireland continue to experience human rights violations within their international protection experience. That is what we [IHREC] most want to see addressed. We want direct provision to be abolished, as was outlined in the Government White Paper. While I fully appreciate that we have unprecedented numbers - this is an unprecedented situation and we can all expect delays - that commitment must be honoured and we must see tangible actions to honour it.

”

The commitments in the White Paper, if implemented, evidence an acknowledgement by Government, that the direct provision system is not grounded in respect for the human rights of persons seeking protection. This analysis cannot be changed even in the face of such significant challenges due to Russia's war on Ukraine.

This report assesses how select commitments made in the White Paper on Ending Direct Provision have been discussed and progressed between February 2021 and September 2022. The report analyses progress, or otherwise, in meeting the White Paper commitments across four key areas:

1. Right to Work.
2. Right to housing.
3. Rights of persons who are highly vulnerable (with a focus on housing).
4. Right to social assistance.

These are core economic and social rights that must be respected. These rights were chosen given the long standing concerns expressed by persons seeking protection, civil society organisations, the Irish Human Rights and Equality Commission and legal experts on how these rights are significantly impacted within the current direct provision system. The protection of social and economic rights of persons seeking protection in Ireland, in line with international legal obligations, must be respected, protected and fulfilled. The White Paper provides the roadmap, at least in part, to ensure the protection of social and economic rights for persons seeking protection.

Methodology in Assessing Progress on White Paper Commitments

The analysis on the extent to which progress is being made in protecting these social and economic rights, this report relies on records obtained under the Freedom of Information Act 2014 (as revised). Focusing on the four key social and economic rights enabled precise freedom of information (FOI) requests to be drafted. As the White Paper implementation is currently ongoing, it was recognised that certain FOI records that exist would be refused. This refusal is permitted where deliberations are ongoing, and it is assessed as not being in the public interest to release such records at this particular time. A number of records, in particular pertaining to deliberations on housing for persons seeking international protection, were rejected on this basis. It should also be noted that at times very similar FOI requests were made to different government departments. This is done as a means of ensuring all relevant FOI records had been released. This also has an added benefit, in that one department may refuse to release a record, due to that particular decision maker's assessment of ongoing deliberations and application of the public interest test. However, a decision maker in a different department may release the records. This occurred in particular regarding discussions on proposed social assistance payments for persons seeking protection. This research had to limit the government departments and agencies from whom FOI records would be requested. Therefore, it is recognised that a complete picture on progress towards advancing social and economic rights may not, at this stage, be possible. Yet, the FOI records released do allow conclusions and recommendations to be advanced in order to hold Government to account in the road to implementation of the White Paper. The Government departments/agencies that were selected, were based on an analysis of where, more likely than not, such records would exist. This research therefore made FOI requests to the following:

1. Department of Children, Equality, Disability, Integration and Youth (DCEDIY).
2. Department of Housing, Planning and Local Government (DHPLG).
3. The Housing Agency.
4. Department of Social Protection (DSP).
5. Department of Justice (DoJ).

A full list of FOI requests and records released are contained in Annex 1 of this report.

Once FOI records were released and reviewed, this permitted further FOI requests to be made. This approach can create a 'snowball' effect, identifying how to craft a subsequent FOI request and further knowledge and understanding of progress being made, or otherwise, in meeting the social and economic rights of persons seeking protection. What was not envisaged in the design stage of this report, was the significant breaches of FOI legislation in terms of response to and release of FOI records requested from the DCEDIY. This significantly impacted on the ability of this report to assess progress on meeting the White Paper commitments, in particular relating to persons deemed to be vulnerable. The DCEDIY did not respond to two FOI requests for a period of eight months. Despite repeated promises that a decision was to be issued, it was only by bringing the matter to the attention of the Information Commissioner that FOI decisions were issued and records released.

It had been initially envisaged in the report design phase that a 'scorecard' could be developed, on a scale of 'A grade' (commitment implemented) to 'F grade' (commitment unlikely to be implemented by mid-2024) based on the FOI records made available. As the research progressed it became very clear that creating such a scorecard would be challenging and potentially reductive. Therefore, the report provides an important narrative overview of the extent to which select White Paper commitments to ensure respect for, and protection of, social and economic rights of persons seeking protection are being discussed and potentially will be implemented. This, it is envisaged, may act as an important advocacy tool, whereby persons seeking protection, civil society and others can utilise to ensure a rights based reception system becomes a reality in Ireland.

The analysis in this report is premised on recognition of the significant role played by persons seeking protection, non-governmental organisations, civil society, the Irish Human Rights and Equality Commission and legal practitioners in challenging the creation and continuation of the system of direct provision. For a select overview of core legal developments over the last twenty-two years of the direct provision system, see here.

Governance

Since the publication of the White Paper in February 2021, structures have been put in place in order to assist in meeting the commitment to end the system of direct provision by mid-2024. The Minister for Children, Equality, Disability, Integration and Youth is responsible for delivering on the commitments in the White Paper.

(a) Project Initiation & Deliverables

As outlined in the Governance Structure for delivery on White Paper commitments, all government departments have a role in implementing the White Paper. The Project Initiation Document (October 2021) provides significant more detail relating to the main goals and deliverables across:

- Phase One and Two Accommodation.
- Comprehensive integration programmes.
- Mainstreaming support services.
- Implementation of Phase Two International Protection Support Payment (IPSP).
- Supports for accessing education and work for persons seeking protection.
- The creation of the International Protection Support Service (IPSS) Transition Team, located in the DCEDIY to lead on implementation of White Paper commitments.

The delivery and implementation of White Paper commitments are to be underpinned by guiding principles, namely:

- Integration from day one: This includes responding to vulnerabilities.
- Human rights and equality based: To respect and protect privacy, dignity, children's rights and access to information at all stages of the international protection process.
- High standards of delivery
- Professionalism
- Community engagement: communities and not for profits offering persons seeking protection supports.

From the FOI records released, this report now presents a clear picture of the deliberative structures in place in order to assess the extent to which the economic and social rights of persons seeking protection will be, at least to a degree, implemented.

(b) International Protection Support Services Programme Board

The International Protection Support Services Programme Board (Programme Board) was established in July 2021. The finalised terms of reference (November 2021) of the Programme Board are to:

- advise on implementation of accommodation options, including transition away from direct provision.
- gain information on how all government departments are meeting White Paper commitments, as well as engage with the Department of Justice Programme Board responsible for streamlining and shortening decision timelines for persons seeking international protection.
- monitor implementation, with a particular focus on rights of the child, identify risks in delivering on White Paper commitments and mitigations to such risks, as well as provide twice-yearly reports to the Minister for Children, Equality, Disability, Integration and Youth.

Membership of the Programme Board was finalised in July 2021. The Programme Board is composed of persons from various Government departments and bodies. The Department of Public Expenditure declined an invitation to sit on the Programme Board. In addition, a number of private individuals chosen due to expertise, representatives of civil society organisations, namely the Irish Refugee Council and the Children's Rights Alliance. Initially, one person with lived experience of the direct provision system was a member of the Programme Board. This person has since resigned. At the time of writing, there was no person with lived experience of direct provision who is a member of the Programme Board. Initially, the United Nations High Commissioner for Refugees (UNHCR) Dublin Office were to be involved within the civil society representative selection. Post communications between the UNHCR and the DCEDIY, the UNHCR stated it would not be appropriate for them to come under the civil society representative umbrella. UNHCR were then invited to join the Programme Board. From the FOI records made available, the Programme Board has held eight meetings between July 2021 and July 2022. The agendas and minutes for meetings post February 2022 were refused, on the basis that this information was 'in the public domain'. However, as of October 2022, these agendas/minutes were not available. Attempts to access these were not successful at the time of writing. The FOI records released on the Programme Board are included within Annex One, as well as referred to throughout this research report.

(c) External Advisory Group

The role of the External Advisory Group within its finalised terms of reference are:

1. Progress monitoring of White Paper implementation
2. Advising the Programme Board and preparing periodic reports for Government on how implementation is proceeding.

Discussions on the composition of the External Advisory Group (EAG) occurred between May 2021 and September 2021. The appointed members of the EAG are: Dr Catherine Day, Dr David Donoghue and Dr Lorcan Sirr. An FOI request sought all External Advisory Group agendas, minutes and papers provided to the them from the date of its establishment to July 2022. From these records, it appears that three meetings of the EAG have occurred between November 2021 and July 2022.

The FOI records released on the External Advisory Group are included within Annex One, as well as referred to throughout this research report.

(d) Government, the DCEDIY & Engagement with Government Departments and Agencies

The Government as a whole is ultimately responsible for implementing the White Paper commitments to protect the social and economic rights of persons seeking protection. The most fruitful FOI records released relate to DCEDIY engagement with the Department of Social Protection on income support and the DHPLG and Housing Agency on delivering on Phase One (up to four months) and Phase Two (after four months) accommodation. These records are engaged with throughout this report. Due to a clumsily and overly precise FOI request by this author (Thornton), the DCEDIY, DHPLG and Housing Agency records are only partially complete.

The Economic and Social Rights of Persons Seeking Protection: Work, Housing, Social Assistance & Protecting the Vulnerable

Irish and European Union Law

Prior to 2018, rights to housing and social assistance were provided on an administrative basis. Persons seeking protection did not have an entitlement to work, and there was no system for determining whether a person had vulnerabilities that needed to be taken into account. Post June 2018 rights to work, housing, social assistance and protection of vulnerable protection seekers have had a legislative footing. Irish legislation in this area must comply with the European Union Reception Conditions Directive (2013). Irish and European Union law on reception conditions for persons seeking protection are broader than the focus of this report. These legal obligations include:

- **Right to housing:** The form of housing provided is at the discretion of Ireland under Irish and EU law. Housing is delivered currently through direct provision centres or emergency accommodation. As established in Irish and EU law, emergency accommodation may be used where accommodation centre capacity is exhausted. This is to be strictly temporary in nature. Persons seeking protection have no choice as to the form of housing that will be offered. Only those who accept housing as offered, are entitled to material reception conditions. Housing rights can be withdrawn in specified circumstances, ultimately subject to a right of appeal to the International Protection Appeals Tribunal by the person seeking protection.
- **Right social assistance:** In addition to housing, Irish and EU law require persons seeking protection to be provided 'material reception conditions'. One element of material reception conditions is an entitlement to a 'Daily Expenses Allowance'. In Ireland, this occurs through the payment of Daily Expenses Allowance (sometimes known as Direct Provision Allowance). Persons seeking protection also have a right to food. This is currently delivered either through provision of meals, or in some direct provision centres, a 'points' system enabling persons to purchase food to make themselves. A right to clothing for persons seeking protection is operated through the Additional Needs Payments system. Additional Needs Payments may also be made to cover costs associated with newborns. Back to Education Allowance will part cover return to education costs,

along with educational clothing and footwear costs for children. Material reception conditions may be limited where a person is earning above certain limits in employment or where through their own finances can cater for their own needs. These rights may be withdrawn in highly specified circumstances, ultimately subject to a right of appeal to the International Protection Appeals Tribunal by the international protection applicant.

- **Rights of persons with vulnerabilities:** There is an entitlement to an assessment of 'special reception needs'. This does not entitle a person to any additional rights, but rather "as being in need of special guarantees in order to benefit from his or her entitlements, and to comply with his or her obligations".
- **Rights to education and training:** The right to education for children and young adults is up to completion of the terminal State examination, the Leaving Certificate. Persons seeking protection permitted to work may undertake vocational training in the same way as an Irish citizen, including such training where it is conducted as part of their employment. Access to university is not protected in law, and is subject to an administrative scheme.
- **Right to health:** Delivered by means of the medical card scheme which grants access to the full range of services in public healthcare. Irish law explicitly notes the entitlement of a person assessed as being vulnerable to access mental health services.
- **Rights of appeal:** As regards accommodation provision, material reception conditions and access to the labour market, appeals on decisions by the Department of Social Protection Department of Children and Department of Justice on these rights may be made ultimately to the International Protection Appeals Tribunal.

Where Ireland is failing to meet its obligations under domestic and EU law to persons seeking protection, damages for breach of EU legal rights may result. There has been one successful damages claim to date for Ireland's failure to respect the right of housing for persons seeking protection. In addition, Ireland's law on the right to work for persons seeking protection had to be amended in 2021, in order to comply with a decision of the European Court of Justice.

The European Convention on Human Rights, which does not form part of European Union law, is indirectly applicable in Ireland due to the European Convention on Human Rights Act 2003 (as revised). The European Convention on Human Rights in the main protects civil and political rights. Decisions of the European Court of Human Rights on social and economic rights for persons seeking protection mainly relate to the near total absence of rights to shelter, sanitation and food for persons seeking protection, if removed to another European Union state under the Dublin system.

Irish and European Union Law

Social and Economic rights are also protected within international human rights law. Ireland has ratified several international human rights treaties that protect social and economic rights, such as: the International Covenant on the Elimination of Racial Discrimination, the International Covenant on Economic, Social and Cultural Rights and the Convention on the Rights of the Child. In terms of holding Ireland to account on protection of social and economic rights, Ireland must report at regular intervals to treaty bodies established to review whether it is abiding by the obligations within these international treaties. Several of these UN human rights treaty bodies have criticised Ireland for failing to fully respect, protect and fulfil the social and economic rights of persons seeking protection over a sustained and prolonged period. See for example the concluding observations of: the UN Human Rights Committee (2014 and 2022), the Committee on Economic, Social and Cultural Rights (2015), the Committee on the Rights of the Child (2016) and the Committee on the Elimination of Racial Discrimination (2020). Unlike breaches of Irish and European Union law, an individual cannot make a claim before Irish courts that Ireland are in breach of international human rights law. Concluding observations are not legally binding, but do offer essential focus on areas where Ireland is failing to meet its freely agreed international obligations. Equality and non-discrimination in the protection and fulfilment of social and economic rights includes persons seeking protection. However, even within international human rights law, this does not extend, at least initially, to an obligation on States to provide the exact same social and economic rights to persons seeking protection as it may do to citizens and other lawful residents. Nevertheless, the UN Committee on Economic and Social Rights has emphasised that restrictions and differentiations should be provided for in law, reasonable, legitimate and proportionate. This indicates that only for the shortest period possible should a State be permitted to restrict full access to social and economic rights. During this period, obligations to provide shelter, food, education, social assistance and the right to work may still apply. Where a person seeking protection remains in a State for a period of time, then there will be less justification for permitting differences in the entitlement to a range of social and economic rights.

For the social and economic rights relevant to this report, in light of Concluding Observations related specifically to Ireland, the following broad obligations towards persons seeking protection are as follows:

- **Right to Work:** No later than six months, a person seeking protection must have their right to work respected.
- **Right to Housing:** Housing should ensure security, dignity, and be suitable for the needs of persons seeking protection. Prolonged living within institutionalised settings is not permissible.

- **Rights of vulnerable persons seeking protection (housing):** Support needs within housing, and other aspects of a persons life, must be provided.
- **Rights to social assistance:** While lower core rates of social assistance may be permissible for a period of time, these lower rates cannot be prolonged. Children (who are seeking protection themselves, or whose parent(s) are seeking protection) must enjoy the exact same social assistance entitlements as citizens/secured residents in a State.

There is no 'one-size fits all' method of delivering on social and economic rights obligations towards persons seeking protection. Justifications for differentiations in entitlement to social and economic rights must be provided for by the State. The White Paper if implemented, to a very significant extent, would broadly indicate meeting of core social and economic rights of persons seeking protection in Ireland.

Other international instruments that Ireland is a party to, most notably the European Social Charter (Revised) requires similar protection of the social and economic rights of protection seekers as is required under UN international human rights law. Therefore, in assessing implementation progress of the White Paper of these select social and economic rights, protection of dignity of the person is to the forefront of the analysis and recommendations.

Right to Work

White Paper Commitments & Progress to Date

The White Paper made the following commitments:

1. *Access to the labour market after six months, where there is no first instance decision. This labour market access would subsist for 12 months, rather than 6 months.*

The recommendation on reducing time period for protection applicants entering the labour market from nine months to six months, was completed on an administrative basis in January 2021, prior to the publication of the White Paper. This administrative arrangement was given legal effect in February 2021, after some delays with getting the legal amendments to the Reception Regulations in place. These changes were notified to the European Commission in March 2021. Persons seeking protection can access the labour market within six months of lodging their international protection claim. This is subject to two conditions: (i) there has not been a first instance decision within six months, and (ii) the reasons for the delay in reaching a first instance decision are not attributable to the person seeking protection. The Department of Justice noted that this reduction to six months, was not full adoption of the Day Report recommendation for entry into the labour market after three months. The reduction to six months in accessing the labour market had been recommended by an inter-departmental working group in December 2019. The Day Report recommendation is under review. Work permits for protection applicants after this date, were for a 12 month period, rather than the previous 6 month period. There was some discussion, albeit incidental, on exclusions of persons seeking protection from employment in the civil and public sector. There was a suggestion that healthcare employment may be removed from this list, but restrictions on employment in higher and further education institutions would remain.

2. *Enhanced employment supports to be provided for persons while in Phase One accommodation, to enable access to the labour market.*

From the FOI documentation made available, there has been limited discussion on enhanced employment activation supports for persons seeking protection. This is not unusual, given that the current focus has mainly been somewhat on Phase One, and more so Phase Two accommodation provision. These employment supports are to be provided by Intreo, the Public Employment Service, for those with permission to enter the labour market (e.g. employment activation courses, employment skills courses etc).

3. *Ensuring persons seeking protection could access banking services. This was subject to the Department of Justice engaging with the Banking Federation of Ireland and other stakeholders in financial services.*

Entitlement to basic banking services for persons seeking protection was announced in April 2021, successfully concluding the Irish Human Rights and Equality Commission's advocacy on this issue. Since May 2021, five banks provide access to banking services for persons seeking protection.

4. *Permitting persons seeking protection the ability to obtain a driving licence, which the White Paper promised would be legislated for by the end of 2021.*

In November 2021, the High Court declared that since the applicants in this case, who were seeking protection, were lawfully in the State for a significant period of time, they would meet the requirements of being resident in Ireland for the purposes of applying for and being granted a driving licence. This decision overtook proposed legislative changes, as no such legislative changes were now necessary. Since December 2021, persons seeking protection can apply for learner permits and driving licences.

Recommendations

In order to give further effect to the right to work for persons seeking protection:

1. Given that Phase Two housing (see below) is to commence within four months of a persons arrival in Ireland, it is recommended that entitlement to access the labour market be granted no later than four months. Preferably, the Day Report's recommendation, of access to the labour market after three months would be implemented.
2. The absolute exclusion of persons seeking protection from employment within the civil and public sector needs urgent reconsideration. It is recommended that the generality of such a restriction be removed, in particular within healthcare, departmental administration and further and higher education.
3. The DCEDIY should engage extensively with the Department of Social Protection to ensure access to employment supports are available prior to a person having an entitlement to access the labour market and after a labour market access permission is granted.

Peer Research: Right to Work

The consensus amongst participants was that the process of applying for a labour market access permit was straightforward. One participant commented:

“It was easy. Immediately I had spent up to 9 months, I made my application, and within a week or two, I got a reply and I received my work permit.”

Participants indicated that despite the ease of accessing a labour market access permit, significant barriers remained to actuating this right to work. The primary barrier to employment listed by participants was the lack of suitable employment opportunities in the nearby area while the primary barrier to accessing education or training opportunities was the lack of access to childcare.

Employment and Underemployment

Participants were vocal about their experience of underemployment. Two participants described their struggles to find an employer who would recognise their academic qualifications and previous employment experience in the finance sector.

“I have a B.Sc in Accounting but no one will give me a job. They want me to get an Irish education first. That is why I am not working in the area where I am trained.”

“I was a banker before coming here. I read finance but I can't find a job in that sector. Now I am studying for healthcare. I am changing my profession.”

There was agreement amongst participants that employment would be easier to find

Peer Research: Right to Work

in the healthcare sector.

“There is job in health care.
That is the easiest to find.”

Volunteering

Volunteering in local community initiatives or organisations can be a useful means of gaining experience and becoming more engaged in the community. However, the same barriers that exist to finding employment also persisted for some international protection applicants when they sought to volunteer. A focus group participant commented:

“Sometimes I just feel that I am not needed. I applied to volunteer somewhere and they were asking for all sorts of things that I could not provide. They wanted GNIB. They wanted references. These are things I cannot provide. Then they just quietly forgot about me. It was a discouraging attitude.”

Driving Licences

Persons seeking international protection gained the right to apply for an Irish driving licence in December 2021. The minority of participants who had applied for a driving licence described the process as being “smooth” and “straightforward”. One of the participants spoke about their experience of applying for an Irish driving permit described how it had changed his feeling of belonging in Ireland.

“Before they started allowing us to drive, I used to feel discriminated against... I used to feel like I do not belong here. But now that I have a learner’s permit, I feel better.”

Right to Housing

Commitments and Context

The stated goals in delivering on right to housing commitments within the White Paper are:

1. Ensuring accommodation promises in White Paper are delivered upon, that is agile and flexible responding to demand. The new model will become a standard feature of Irish society across cities and towns. A detailed transition plan for moving people out of Reception and Integration Centres (RICs) will also be needed and will be developed.
2. An integration model based on human rights principles will be achieved.

The underlying assumption on which inter-departmental and Programme Board planning is occurring, is that a person will have their protection claim determined to completion within a fourteen month period.

For the first four months after a person seeking protection arrives in Ireland, they will have entitlement to reside in Reception and Integration Centres (RICs) as part of Phase One accommodation. There would be six RICs nationwide, with a capacity for 2,000 people at any one time. RICs would be state owned but privately operated. There would be no choice as to location of the RICs a person seeking protection would be offered. Within RICs, persons would be able to prepare their own meals. Families would have own-door housing, while single persons would have their own bedroom. The White Paper emphasised that such an approach was warranted so as to end institutionalised living. There would be various integration assistance available including English language and preparatory employment supports. Within RICs, case-workers would engage with persons seeking protection so as to enable them to move into Phase Two Accommodation in the community after four months. While the views of the persons seeking protection would be taken into account as to preferred location, this would be subject to availability of Phase Two accommodation. From the FOI records available, there has been more limited consideration on establishing the six RICs, other than noting it is a necessity in order for the two-stage accommodation elements of the White Paper.

From month four until a decision is reached on an individual's protection application, there would be an entitlement to community based accommodation in Phase Two. The assumption on which planning for White Paper implementation is based, is that up to 3,500 persons would be in Phase Two within any 12 month period. Families would have own-door accommodation. Single persons would have own-room

accommodation within housing. So as to enhance integration, Resettlement and Intercultural Workers, employed by local authorities, would act as a contact point for persons seeking protection to access relevant public services. For persons with particular vulnerabilities, enhanced integration supports were to be provided by (unidentified) non-governmental organisations, while high-support accommodation was, if necessary to be provided. There has been significant interdepartmental deliberations on establishing Phase Two accommodation. Much less so on potential accommodation needs of persons with identified vulnerabilities.

The Phase One and Phase Two accommodation options emerged in December 2020, moving away from the Day Report recommendations which proposed Housing Assistance Payment or Homeless Housing Assistance Payment be available. The White Paper commitments on housing developed after significant discussion between DCEDIY and the Department of Housing, Planning and Local Government (DHPLG) between November 2020 and February 2021. The initial proposal by DCEDIY, was that Phase Two accommodation would commence after six months, however this was changed in February 2021 to four months. The DCEDIY proposed a 'three-strand' model in November 2020, focused on persons seeking protection with low, medium and high support needs, underpinned with a need for state build accommodation. The DHPLG had a number of concerns regarding the commitments within drafts of the White Paper, while comments from DHPLG officials raised issues such as perceived unfairness between persons seeking protection having access to own-door/own-room accommodation within four months, while persons entitled to social housing have to wait many years for this to be provided to them. One official stated:

“

There is still a risk that this may lead to issues where social housing applicants on the social housing waiting list for many years may feel that immediate provision of own door AHB [Approved Housing Body] housing after six months to asylum seekers is unfair given they have to wait substantial periods of time for AHB or [Local Authority] LA accommodation, e.g. up to 10 years is not uncommon for a standard family in Fingal.

”

This same official asked where a person seeking protection is found not to have a protection need, whether particular centres to enable deportation would be established, so as to move people out of Phase Two accommodation. The DHPLG continued to have some concerns on what became official Government policy with the publication of the White Paper in February 2021. Post February 2021, the DCEDIY has engaged with the DHPLG, the Housing Agency and the County and City Management Association in seeking to deliver on White Paper accommodation commitments.

From the FOI records released, the key focus to date of discussions and deliberations on delivering upon White Paper commitments has been on the precise model of accommodation for Phase One and Phase Two. Important structural commitments interlinked with accommodation models, such as implementing of integration support and engagement with local communities have interspersed a variety of FOI records including:

- Memorandum of Understanding between DCEDIY and the Housing Agency.
- The County and City Management Association (CCMA) Distribution Model (July 2021) and the October 2021 Budget Update. A CCMA paper on a business case for integration models had been prepared (not released under FOI), but it was noted consideration of this had been paused in April 2022.
- The Project Initiation Document (October 2021)
- Discussed in a number of Programme Board meetings in particular in April and July 2022, however papers regarding implementation timelines, an initial review of progress on delivering upon White Paper commitments, the integration support structures including a draft County and City Management , accommodation funding models for Approved Housing Bodies were refused under FOI as deliberations on these matters had not concluded. A communication strategy on local community engagement with the delivery of Phase One and Phase Two Accommodation was described in April 2022 as being in progress. Budget 2023 (October 2022) provides funding for integration officer posts for each local authority.
- The External Advisory Group in their meetings of 04 November and 19 November 2021 and February 2022 meeting were provided with updates, including on, integration supports and communication planning with local communities.

Therefore, the assessment of work and planning to meet the White Paper commitments will focus on deliberations regarding bringing Phase One and Phase Two accommodation on stream.

A Memorandum of Understanding between the Housing Agency and DCEDIY was agreed in July 2021. The Housing Agency agreed to provide advice, technical assistance and support to DCEDIY in terms of delivery of Phase One and Phase

Two accommodation. This would include supporting Approved Housing Bodies (AHBs) in acquiring or construction of Phase One RICs and Phase Two dwellings, along with alternative models for Phase Two accommodation.

The most significant issue, not overly discussed in the FOI records, is the budget for meeting on White Paper commitments. Budgets are divided into current, day to day, and capital, building, expenditure. For Budget 2021 (October 2020), pre-the White Paper, there was no capital expenditure allocated to DCEDIY under the budget line of delivering a fair and efficient support system for persons seeking protection. Budget 2022 (October 2021) allocated €12.5 million for capital spending towards White Paper implementation of Phase One and Phase Two accommodation. However, the Secretary General of the Department of Children, Equality, Disability, Integration and Youth indicated in October 2021, that they had received a commitment from the Department of Public Expenditure that this budget could be increased, if more funding was required for capital infrastructure. In addition, it was implied that the capital expenditure would be increased each year, as further capital building projects would receive funding. A subsequent budget update from the International Protection Transition Team confirmed this. However, Budget 2023 (October 2022) envisages a 5% reduction in funding to deliver on current supports to persons in the international protection system, and a reduction in capital funding €9.5 million (minus €3 million) for Phase One and Phase Two accommodation implementation. This has to be seen in the context of a significant increase to the DCEDIY's current expenditure for persons seeking protection. (There is a separate €1.6 to €2.2 billion budget line for responding to provide accommodation, social protection entitlements and education to persons with Temporary Protection).

Progress to Date - Phase One (Month One to Four): Reception and Integration Centres (RICs)

Deliberations on accommodation options to date have significantly focused on Phase Two accommodation. The White Paper commits to establishing six new RICs to accommodate up to 2,000 people who have sought international protection. The FOI records released add little else to the analysis of how this commitment is progressing. The timelines for delivery (pp. 12-14) indicates that only in 2023 would capital projects be advanced to build all new RICs, and to be operational in 2024. It was suggested that Approved Housing Bodies (AHB) may have a role in building and then subsequently operating RICs. Programme Board implementation updates from February 2022 stated that the DCEDIY were engaging with the Housing Agency on this issue. The April 2022 update noted that it was possible that the acquisition of RICs would be 'fast-tracked'. It may be that purpose-built housing for persons with Temporary Protection status, would subsequently be used as Phase One RICs.

Progress to Date - Phase Two (Month Four onwards): Housing in the community

Deliberations between DCEDIY, the DHPLG and the Housing Agency on types of housing that would be provided to persons seeking international protection within Phase Two commenced in April and May 2021. The key thinking on how Phase One and Phase Two accommodation could commence was identified in the Memorandum of Understanding in July 2021. This July 2021 Memorandum identified a key role for Approved Housing Bodies delivering Phase One, and part of Phase Two housing. For Phase Two, urban renewal schemes, purpose built housing, private tenancies and non-governmental organisation supported housing were to potentially all be utilised to deliver on White Paper commitments.

(a) Acquisition of Properties & Ownership Model

By 08 February 2022, various properties had either been acquired or were in the process of being acquired by the Housing Agency to accommodate up to 218 people. As of 09 April 2022, the following properties were in the process of being secured by the Housing Agency: nine properties acquired and forty-four properties with bids accepted. This included seventeen two-bed properties, twenty one three and four bed properties and four 'larger properties'. There is no indication of what is meant by 'larger properties', nor of the precise amount of people these properties could potentially accommodate. This can be usefully contrasted with the commitments in the White Paper by mid 2024:

- 400 properties for 400 families of approximately 1,600 persons. It was envisaged that half of these properties would be bought, and the other half purpose built.
- 40 shared properties for 1000 single people (approx. 25 people per property). This would entail 40 apartment blocks, 20 acquired and 20 newly built.
- Urban renewal units for single persons accommodating 750 people. Urban renewal units would be derelict or formerly commercial properties, which could be renovated to make them suitable for housing. There are no indications in the FOI records of progress made on this housing stream.

The key issue between April 2021 and April 2022 related to the ownership model for Phase Two housing e.g. would the DCEDIY own the properties, or would the properties be owned by an Approved Housing Body (AHB), either through DCEDIY providing funding for this, and the AHB only permitted to use this housing for persons seeking international protection. By September 2021, the Housing Agency prepared a number of scoping and information papers to support deliberations between Government departments, the Programme Board and External Advisory Group on Phase Two housing. Information papers on the following were prepared:

acquisition of properties (refused under FOI as matter under active deliberation), the role of Approved Housing Bodies in Phase Two accommodation, differential rents, funding models of Approved Housing Bodies, housing standards in Phase Two accommodation, Ownership Options, property types that would be used in Phase Two (refused), rent contribution scheme for persons in Phase Two accommodation (refused), different types of social leasing structures in place, and considerations as to the tenure rights of persons in Phase Two accommodation. For some of these papers, consideration of how this information could inform the design and delivery of Phase Two accommodation was redacted in the FOI records made available. A further paper from March 2022, on the practicalities of designing funding schemes for Phase Two accommodation was not released under FOI. The level of planning and consideration of several models is to be commended, as it evidences to a degree a level of deliberation of complex issues, which had been previously lacking in Ireland's approach to meeting its obligations to providing housing to persons seeking international protection.

An Ownership Sub-Group of the Programme Board was tasked with recommending to the Programme Board the ownership options that the Minister for Children, Equality, Disability and Inclusion should adopt. The Sub-Group comprised of John O' Connor who was Chair and former CEO of the Housing Agency, Tanya Ward of the Children's Rights Alliance, Nick Henderson of the Irish Refugee Council, Paul Benson, DHPLG.

Meetings occurred on 01 November 2021 and 11th November 2021. However, records prepared by the Sub-Group, including minutes (if any) were not released. On 25th November, a draft report of the Ownership Sub-Group was circulated to the Programme Board. In December 2021, the Ownership Sub-Group completed their twenty-seven page report.

The Ownership Sub-group recommended that there be two potential models for Phase Two housing needs of persons seeking protection, post consultation with the AHB sector. The Sub-Group of the Programme Board conducted a variety of economic and cost analysis, and recommended:

1. Properties should be owned by an Approved House Bodies (AHBs). The financing of such properties would have to be considered in more detail, however a core funding stream from central government could be created. The sub-group noted that it was likely a small number of larger AHBs would potentially have the capacity to engage with this model. While AHBs would have ownership of the properties, this could subject to restrictions limiting their use persons seeking protection with an entitlement to Phase Two accommodation only. It was noted that it was unclear if AHB would have the ability to provide all Phase Two accommodation needs. The recommendations noted that given the turnover of

individuals moving through properties, there may be increased maintenance costs compared to schemes usually run by AHBs. The report noted that AHBs take very seriously their obligations towards tenants, including selection, and noted that if DCEDIY were responsible for allocation- it was unclear how AHBs would view such a system.

2. The DCEDIY would own the properties and contract AHBs to manage Phase 2 accommodation. Significant systems would need to be put in place regarding permitting DCEDIY to manage such a property portfolio.

The Sub-Group noted that it may be that both approaches could be used, and whatever approach was to be adopted, significant engagement with AHBs would be needed to secure 'buy in' on provision of Phase Two housing for persons seeking protection.

It was noted at the Programme Board meeting in December 2021, that it would be unusual for a Government department like DCEDIY to maintain an extensive property portfolio. Usually property would be owned by the Office of Public Works (OPW), although a few exceptions to this such as army barracks owned by the Department of Defence. However, there was also recognition that innovative solutions would be needed in order to meet the White Paper accommodation commitments.

In February 2022, the Programme Board were informed of the ownership model which was approved by the Minister for Children, however this is redacted from the FOI record provided, given that it is still policy in development. However, a funding model for AHBs was discussed, but an information paper on this system was refused under FOI. The April 2022 implementation update indicates that two papers on the tendering process and funding model for AHBs to deliver Phase Two accommodation were under consideration.

(b) Rent Contribution, Distribution Model ('Dispersal') & Timelines for Delivery

The February 2022 Programme Board meeting discussed 'issues' with persons seeking protection potentially moving into Phase Two housing, stating,

“

...that people currently in Direct Provision do not pay rent and utilities, therefore might be reluctant to transition to a new model where they are expected to pay rent...

”

It is wholly unclear on what basis or analysis that this statement was being made.

Persons in social housing pay what is known as 'differentiated rent'. Differentiated rent is a 'social rent' that is paid by persons entitled to social housing. The level of differentiated rent for persons entitled to social housing differs depending on the local housing authority area that they are living. It is well below the level of market rent, and calculated as a percentage of household income (including where household income derives solely from entitlement to social assistance). From the FOI records released, it is highly likely persons in Phase Two housing will pay a 'differentiated rent'. As of March 2022, the Housing Agency were developing a paper on levels of differentiated rent that would be payable by persons seeking protection in Phase Two housing.

A September 2021 'distribution model' indicates how persons seeking protection would be geographically spread throughout Ireland, so a system of dispersal of persons seeking protection will continue. This September 2021 model based its decisions on the 2016 Census and noted that the geographical distribution would also depend on whether RICs operated in a particular local authority area. It was indicated that numbers above 3,500 in Phase Two housing would create 'significant issues'. In determining where Phase Two housing should be brought on stream, that each county in Ireland would need to play a part- in particular local authorities. Dublin City Council, along with Fingal, Dun Laoghaire – Rathdown and South Dublin County Council would have the greatest number of persons seeking protection entitled to Phase Two housing within their local authority functional areas (990 persons). Cork City and Cork County would be the next highest (399 persons). Leitrim Council will have the least number of persons seeking protection in Phase Two housing (24 persons). A full distribution model can be read at page 7 here.

The timelines for delivery (pp. 12-14) of White Paper commitments, in particular the delivery of Phase One and Phase Two housing, no longer reflect the challenges currently ongoing due to Russia's invasion of Ukraine, the obligation to provide Temporary Protection to persons fleeing Ukraine, and the increase in arrivals of persons seeking international protection. The delivery timelines required that by the end of 2021, the planning process for building Phase One and Phase Two housing would be commenced. By end of 2022 single persons in direct provision would have single occupancy rooms, and some persons seeking protection would begin to move out of direct provision into a transitional Phase Two accommodation model with income supports. By the end of 2023 building of RICs would be near completion, families would move into private tenancies, so that all commitments would be delivered by mid-2024, with private accommodation providers decommissioned. At the time of writing, the Government has not indicated any timeline update to the delivery of the commitments made in the White Paper on Ending Direct Provision.

Recommendations

In order to meet the White Paper objectives on a rights-based housing model for persons seeking protection:

1. A clear and achievable timeline and progress update on the implementation of Phase One and Phase Two housing should be provided as a matter of urgency (if not already done so by the time this report is published).
2. Multi-year capital expenditure budgets for delivering on Phase One and Phase Two accommodation commitments are required as a matter of urgency. This would significantly enhance decision making processes on delivery of White Paper commitments.
3. A clear policy on dispersal for persons seeking protection needs to be recommended by the Programme Board, with oversight from the External Advisory Group. This should include (i) providing rationale for a decision on placement of a person seeking protection in a particular Reception and Integration Centre (RIC), (ii) the dispersal area offered for Phase Two housing (iii) consultation with the person/family. The basis upon which a person may request a review of the area they are dispersed to under Phase One or Phase Two should include a clear review/appeal process.
4. Acquisition of properties to date has been limited, even if this was focused on delivering the capacity envisaged in the White Paper (2,000 persons in Phase One and 3,500 persons in Phase Two). There is an urgency to commence a capital building programme or acquire properties. Significant planning needs to commence imminently to bring such a large number of housing options on stream.
5. It has been noted that there is potential overreliance on a small number of yet to be identified Approved Housing Bodies who may provide Phase One and/or Phase Two housing to persons seeking protection. It is essential, if this has not already occurred, that substantive engagement with Approved Housing Bodies commence to identify their capacity/expertise in providing such housing. Where Approved Housing Bodies indicate limited capacity to engage, then purpose built/acquired housing will be necessary.
6. Detailed planning in light of current realities of increased numbers of persons seeking protection must identify human rights-based solutions to provision of accommodation that ensures dignity, privacy, autonomy and respect.
7. The rent contribution (differentiated rent) for Phase Two housing should be set nationally, so as to avoid discrepancies between local authority areas.
8. The delivery of Phase Two housing should not be premised on unevidenced assertions from policy makers regarding supposed concerns that people will not move on from RICs if Phase Two accommodation is available to them. Discourses on persons seeking protection as not wanting to pay differentiated rent, utilities, and do not want to cook for themselves dominated discourse on direct provision for over twenty-years.

Peer Research: Right to Housing

95% of survey respondents indicated that they were aware of the White Paper.

Current conditions in direct provision and emergency accommodation centres

One survey respondent described their experience as living in a “hellhole”.

Participants in the focus group of emergency accommodation residents expressed their feelings that the management of the centres imposed strict routines which often meant that residents could not pursue a lot of personal interests or explore other ways to provide whatever they lacked for themselves. Focus group participants commented:

“

“I have been here for more than six months and can tell you that we are not allowed to bring anything into the place that can make life better for us. For example, when I tried to bring in microwaves and fridge, they stopped me. When people tried to cook in their rooms, they confiscated their utensils and hotplates. You just have to eat what they give you. You must also eat whenever they say it is time to eat. Like prisoners. They just take control of your life!”

”

“

“Living like this (in a single standard hotel room without cooking facilities and no control over what to eat) has affected my children a lot. My children have fallen ill many times because of the diet here and I am just tired of not having a choice...”

”

Even in centres where there were access to shared cooking facilities, participants noted that there were often quarrels over the use of space and cooking facilities. One participant noted that the food she cooked for her family was stolen once, and thereafter she always had to remain in the communal kitchen while her food was cooking. A second focus group participant elaborated on how conflict arose in managing the use of shared facilities in an overcrowded centre:

Peer Research: Right to Housing

“

“Every time I step out of my room, I always feel like I am walking through a narrow road because you don’t have enough space to express yourself. You have to take care not to bump into another person along the narrow corridor, and even in the laundry. Then you have to share many places with other people, like the laundry, and this is not good. Sometimes people fight over who should use the washing machine first; people fight over many things. And the staff don’t help—sometimes they support some people against another. It is not a happy place, honestly...”

”

Another focus group participant who had been in the international protection system for more than two years stated:

“

“Nothing has changed, really. I am aware that in some hostels some changes have been introduced, for example some hostels are now self-catering, but here nothing has changed. In fact, I believe things are even worse. Even the staff are getting worse in their attitude.”

”

Transition out of direct provision

Of the survey respondents who had been granted an immigration status, the majority had been waiting between 13-24 months to move out. The types of ‘transition supports’ received varied from assistance to fill out and submit a housing application to a local authority to information on how and where to look for accommodation.

Discrimination in the housing market was raised specifically by a survey respondent and by a focus group participant:

“

“Nothing improved am still here looking for a rented apartment. There is still lots of discrimination...”

”

Peer Research: Right to Housing

The focus group participant was able to point to a concrete example of discrimination in their search for accommodation:

“

“A lot of landlords don’t accept HAP payment and many others will not give their house to black people. Each time I ring to enquire about a house, they would tell me it had been taken. One day, I asked an Irish friend to make a call for me, pretending to be the one inquiring about the house. Guess what? He was told to come for inspection even after the same agent had told me earlier that the house was unavailable. That is our experience in the rental market.”

”

The focus groups were asked what supports would be useful to them in looking for accommodation and the consensus was that social workers or support workers needed to be more actively involved in the accommodation search. One participant suggested:

“

“Our social workers need to do more for us. They need to help us during viewing. They need to stand for us. It is very difficult to do this thing alone. We need their assistance.”

”

Ending Direct Provision by 2024

Survey respondents and focus group participants were positive about the accommodation recommendations but were sceptical that the commitment to end direct provision by 2024 would be realised. It is worth noting that the surveys were completed months prior to the [reports](#) that the Minister for Children, Equality, Disability, Integration and Youth conceded that the plan to end direct provision would likely be delayed.

One focus group participant strongly opined that they did not believe that the government would be able to deliver on the not-for-profit system committed to in the White Paper:

Peer Research: Right to Housing

“

“Personally, I believe that DP [direct provision] is a vast business from which everyone is reaping a profit. Even politicians are making some money from it in one way or another. That is why it will not end. It will only take another form. Mark my words. The new reception system will also run on profit, you will see.”[ks1]

[ks1]Suggest this section comes after the transition section, i.e. as the last sub-section in this section and that it is given a heading

”

Accommodation for persons seeking protection with vulnerabilities, including trafficking survivors

Commitments and Context

Following on from, and interlinked with the assessment of right to housing, the White Paper committed to the following relating to persons with particular vulnerabilities:

- Vulnerability Assessments: 'Building on' the current pilot vulnerability assessments scheme to include: health referrals, signposting to relevant support services, accommodation options, management. Ongoing process. Concept of vulnerability may encompass a wide range of issues: older persons, persons with disabilities, persons who are LGBT+.
- Supported accommodation options (including domestic and gender based violence survivors and survivors of trafficking): To include Phase Two accommodation, with additional unidentified specialist supports provided by non-governmental organisations.
- LGBTQI+ persons: Accommodation in Stage Two to recognise potential vulnerabilities and signpost support organisations.

This issue of vulnerable applicants was often discussed in passing within Programme Board minutes. Based on FOI records released, it appears housing for vulnerable applicants were not considered in any significant detail to date. It may be that the general accommodation system for Phase Two housing is seen as the key issue that has to be addressed now. Then, potentially more dedicated and focused consideration of persons who are highly vulnerable.

The challenge in assessing rights of vulnerable protection applicants was further compounded by the eight month delay by the DCEDIY in issuing records pertaining to White Paper implementation and vulnerable applicants. An initial FOI request on 07 December 2021, was not responded to until the 19 August 2022. This FOI was only responded to after engagement with the Information Commissioner. The records released provide a fascinating insight into how the accommodation proposals generally developed, from the Day Report to the White Paper. However, how the commitments made on persons with vulnerability

and accommodation in the context of implementation of the White Paper is absent.

A second FOI request on vulnerable applicants on 08 August 2022, for the period 08 December 2021 to 08 August 2022 further evidences lack of sustained engagement with this issue. Given the lack of records relating to the request, which appears surprising, confirmation was received that extensive search of potentially relevant records had been conducted.

Given the delay in receipt of initial FOI records, it was not possible to pursue potential further FOI requests that may have assisted in shedding light on implementation developments for persons with vulnerabilities. From a response to a Parliamentary Question on 25 October 2022, it has been noted that the Housing Agency has acquired one property for persons with vulnerabilities. This is currently being used to accommodate persons with Temporary Protection status. It has been indicated that this property will be available for persons with vulnerabilities in 2023. That the FOI records identified by DCEDIY did not evidence the lead up to discussions on this Ministerial response (even if records were outlined but not released), is concerning and again highlights potential limits with the implementation of FOI obligations.

On 16 February 2021, the Special Rapporteur on Trafficking requested information from the Department of Foreign Affairs on the system of direct provision, rights of Trafficked persons, and the extent to which the White Paper will change Ireland's approach to meeting support needs of persons who are victims of human trafficking. The Special Rapporteur noted the extensive obligations Ireland has under international and European human rights law. Between April and June 2021, the Department of Children led on providing information permitting the Minister for Foreign Affairs to respond to the Special Rapporteur's request.

Commitments and Context

In order to respect, protect and fulfil the social and economic rights for persons with vulnerabilities:

1. Immediate planning to deliver housing rights for persons seeking protection with vulnerabilities needs to be occur without any further delay.
2. There has been no engagement, based on FOI records made available, with potential non-governmental organisations who are identified as being responsible for delivering wrap-around supports. Engagement with non-governmental organisations must commence immediately.

Peer Research: Accommodation for persons seeking protection with vulnerabilities, including trafficking survivors

At the time the qualitative research was carried out, there was no information available about accommodation for persons seeking protection with vulnerabilities, including trafficking survivors. The survey and focus groups instead asked about the experience of vulnerability assessments. Since 1 February 2021 all persons who make an application for international protection to the International Protection Office (IPO) should have been offered a vulnerability assessment by the Resident Welfare Team in IPAS.

There was a mixed understanding of the vulnerability assessment amongst focus group participants. Respondents to the survey who indicated that they had received a vulnerability assessment and had received some form of support afterwards did not answer a follow up question indicating the nature of the support given. The peer researcher raised the question of supports again during focus groups. One participant who was visually impaired indicated that they received a vulnerability assessment but did not receive any additional support during accommodation allocation or in any other area. One focus group participant who was a parent noted how unsuitable the accommodation their family lived in was for children:

“

“As you can see, it is hard to find a safe space for our children to play...the road is dangerous, and our hotel is too tight, too much people here. Children cannot find a place to play except we take them across from here, across the road. There is no playing area within this hotel. We have to go over the road. You cannot even tell your child to go out and play. You must take them there, across the road..”

”

The White Paper commitments on providing accommodation supports to persons seeking protection with vulnerabilities reference referral to NGO supports and referral organisations. The qualitative research did not explore engagement with existing specialist support organisations in recognition of the sensitivity of that data.

Right to Social Assistance

White Paper Commitments & Progress to Date

Prior to the publication of the White Paper, the Department of Social Protection (DSP) had proposed that they would be responsible for administering payments only, while the Department of Children, Disability, Equality and Inclusion (DCEDIY) would be responsible for determining eligibility conditions for entitlement. In response to the draft of the White Paper, DSP made observations as tracked changes to the draft (and here) requesting that entitlement to Phase Two housing and payments not occur for six months. The rationale was that decision making processes on international protection claims should take no more than six months. Ultimately, the White Paper determined that the move to Phase Two housing would occur after four months.

(a) Phase One (Month One to Four): Daily Expenses Allowance

Maintain daily expenses allowance (often called direct provision allowance) for persons in Phase One housing, reviewed annually.

For persons within Phase One accommodation, there will be an entitlement to Daily Expenses Allowance. There has not been an increase in Daily Expenses Allowance since 2019. The rates are €38.80 per week per adult and €29.80 per week per child. Where a person declines to accept an offer of Phase One housing in RICs, there will be no entitlement to Daily Expenses Allowance. (This mirrors the current approach relating to a refusal of direct provision accommodation). In October 2021, it was suggested by a member of the Programme Board that that Daily Expenses Allowance be increased and regularly reviewed to ensure the amount is sufficient. A point was also made that for residents currently in self-catering direct provision accommodation, who receive 'points' in order to purchase items, should instead be permitted to source these items themselves and be given the financial means to do so. Post the White Paper publication, no discussion occurred as part of Budget 2022 for an increase in the rates of Daily Expenses Allowance, in either the DSP nor the DCEDIY. Despite the significant increases in cost of living, the core rates of Daily Expenses Allowances were not increased in Budget 2023, beyond a double payment for one week in October 2022 and the December 2022 'Christmas bonus'. The White Paper committed to an annual review of Daily Expenses Allowance, once the new system is in operation. The FOI documentation does not indicate that such an annual review system has been discussed or planned for to date.

(b) Phase Two (Month Four onwards): International Protection Support Payment & International Protection Child Payment

The DSP and DCEDIY have discussed the International Protection Support Payment (IPSP) and International Protection Child Payment (IPCP) between October 2021 and March 2022. From FOI documentation made available, there has been no discussion after this date, up to August 2022. The documentation includes:

- A draft high level briefing paper prepared by DCEDIY in October 2021 which indicating their broad thinking, as regards how the payments would operate. The DSP note on this meeting indicated some concerns regarding the proposals. The draft high level paper was provided to the Programme Board.
- Between November 2021 and March 2022 the DSP and DCEDIY put forward proposals and counter proposals regarding which Government department should be responsibility for administering the new payments.
- A March 2022 High Level Paper indicates that DCEDIY are now seeking to put in place complex arrangements for determining eligibility, ensuring applicants are still eligible, review/appeal mechanisms to permit applicants on stated grounds to appeal a decision, and payment processes.

International Protection Support Payment (IPSP), to be paid at a rate similar to the social assistance payment Supplementary Welfare Allowance.

The March 2022 High Level Paper indicates general agreement on the rates of IPSP that a person will be entitled to, once they are in Phase Two housing.

Rate - Single Adult	Rate - Single Adult (no children) under 25 and not living independetly	Rate - Couple	Child Dependent Addition
€208	€117.50	€208 + €138 = €346	€40 per child under 12 €48 per child over 12

These rates map onto the 2022 payments for persons entitled to Supplementary Welfare Allowance. It is noted in the March 2022 High Level Paper that persons entitled to IPSP will have to cover the cost of heating, electricity, light etc as well as the cost of differentiated rent (this is similar for persons entitled to 'mainstream' social assistance allowances). However, as regards child dependent allowance, a tracked change from an official asks whether inclusion of the child dependent rate is "making it too complicated". It is essential that the White Paper commitment is fully realised, so that persons in Phase Two housing are entitled to the minimum core subsistence social assistance rates in order to live with a modicum of dignity.

The IPSP will be subject to meeting the following eligibility requirements:

- A person who had not accepted the offer of Phase One housing will be entitled to IPSP after four months.
- A person exited Phase One housing, regardless of whether they have been offered/accepted Phase Two housing will be entitled to IPSP after four months.
- Where, through no fault of the person, they are not offered Phase Two housing, and are unable to move out of Phase One housing, a person will only be entitled to Daily Expenses Allowance.
- A person's international protection application remains to be determined, or for no more than six months after a final decision on an international protection claim has been made.
- A person satisfies a means test that is the same as the means test that a person is required to complete as if they had applied for Supplementary Welfare Allowance.

There is an need for urgent reflection on the proposed denial of IPSP to persons who, through no fault of their own, do not receive an offer for Phase Two housing. If this draft eligibility criterion is not amended, it will permit persons to continue living on a weekly payment rate far below the level necessary to enable participation in Irish society. With the core focus of the White Paper seeking to adopt a human rights based approach, there is no justification for a person in this situation receiving a lesser payment for an indeterminate period of time. While a contribution to Phase One housing costs would be permissible, this should be no more than at the level of differentiated rent, along with a reasonable contribution to heating and lighting costs, for persons who are, due to State inaction, having to remain in Phase One accommodation.

International Protection Child Payment (IPCP): To be paid at the same rate as child benefit, €140 per month per child (and increased in circumstances of multiple births).

IPCP, like Child Benefit, will not be means tested and will be available to all protection applicants with children four months after lodging an international protection claim. This will be regardless of whether a person accepts Phase One and/or Phase Two housing. Where a person does not enter Phase One accommodation, they will also be entitled to IPCP after four months. This payment will not be linked to the offer/acceptance/refusal of Phase Two housing. For persons who are not offered Phase Two housing (due to a lack of housing), unlike the proposed eligibility requirements for IPSP, they will be entitled to IPCP.

Administrative systems to determine entitlement to Daily Expenses Allowance, IPSP and IPCP.

The legal basis for Phase One payments under the Reception Conditions Regulations 2018 (as amended) will continue. The DCEDIY committed in February 2022 to adopting a legal basis for IPSP and IPCP through amendment of the Reception Conditions Regulations 2018.

A key concern from the FOI documentation is the establishment of administrative systems to determine entitlement to IPSP. Initially, the DSP proposed that they would act as 'paymaster' i.e. they would only process the payment under instruction from DCEDIY. There is some evidence, around the time the White Paper emerged, that this was agreed by DCEDIY. This would be operationalised through DCEDIY determining entitlement to the payment. DCEDIY as late as November/December 2021, stated that it should be the responsibility of DSP to determine and process payment entitlement. However, an official in DSP in response to DCEDIY's understanding of the White Paper commitment, stated:

“

We foresaw at the time that DCEDIY might look to land us with this, hence the explicit emails at the time, nailing this down.

”

By March 2022, DCEDIY had decided that they would determine eligibility for IPSP and IPCP and be solely responsible for processing payment. While not stated explicitly, it may be the case that DCEDIY will also assume sole responsibility for processing entitlement to Daily Expenses Allowance. Assistance was requested from DSP to second staff in order to:

- Design the application, payment process, means testing, review and appeals process.
- Advise on operationalising the payment, including by advising as to whether ‘a third party’ could be made responsible for this.

An implementation update to the Programme Board in April 2022 indicated that DCEDIY was in contact with DSP regarding implementation of IPSP and IPCP. The White Paper commits to ‘whole of government’ approach to implementation. For persons entitled to social welfare, there is a developed machinery for determining entitlement within the Department of Social Protection. That these legal and administrative mechanisms are not going to be utilised is deeply concerning. Were the current DCEDIY proposals for application, decisions on eligibility, means testing, internal review of unsuccessful applications for payment, and potentially an appeals mechanism to be implemented, it would represent a failure of a supposed whole of government approach to implementing the White Paper.

(c) Other social assistance payments

A person in Phase One or Phase Two housing will have continued entitlement, once satisfying eligibility and means test requirements, to Back to School Clothing and Footwear Allowance and Additional Needs Payments.

Recommendations

In order to ensure adequate protection of persons seeking protection to social assistance:

1. The White Paper indicates a rights-based approach for entitlement to income maintenance supports. It is of deep concern that the commitment to review the rate of daily expenses allowance has not occurred since 2019, in particular post publication of the White Paper. There must be an immediate review of the levels of payment for Daily Expenses Allowance pre the full implementation of the White Paper. This is to ensure a person currently in direct provision accommodation for less than four months, who is legislatively prevented from working for six months, has access to a level of financial support that is appropriate.
2. DCEDIY, in coordination with DSP, should establish the key criteria for eligibility for International Protection Support Payment (IPSP) and International Protection Child Payment (IPCP). Given that the White Paper proposals are based on human rights approaches, after four months, a person should be automatically entitled to IPSP and IPCP where they otherwise meet eligibility and means test for entitlement. Where a person is not offered Phase Two housing, reasonable

reductions to the IPSP should be no more than the differentiated rent payable, along with a reasonable contribution to heat/lighting, prepared meals etc.

3. Legal structures under the Social Welfare (Consolidation) Act 2005 (as revised) should be mapped onto IPSP and IPCP for: application, determining eligibility, means testing, review and appeal of decisions. A shadow application, eligibility, review and appeals system should not be created by DCEDIY. Such systems and expertise already exist within the DSP.

Peer Research: Right to social assistance

The qualitative research predated the public reports of proposals to introduce fees for residents of direct provision with an immigration status, removal of automatic entitlement to medical cards and reductions to income supports.

Participants in the research primarily indicated a concern with having their physical and mental health needs met. This includes access to a GP as well as access to appropriate hospital facilities, medication, counselling etc.

Focus group discussions showed that participants did not feel that progress had been made since the publication of the White Paper. One participant commented:

“

“Although we have access to a GP, every time we complained about our mental health problem the response is always that we should get busy. They never seem to care much. We also have a medical card but it is not everything that is covered by the medical card. You just have to pay for some treatments with your own money.”

”

Some participants in focus group discussions spoke about receiving psychological counselling following visits to the hospital, but noted that this was only possible after a long time of repeatedly complaining to their caseworkers and GP. Here is how one participant put the matter:

“

“It was not IPAS that gave me support... it was my caseworker who refer me to Spirasi and from there to a psychologist. But that was many months after I came here. Even my GP did not refer me.”

”

Focus group discussions that were held at emergency accommodation centres unearthed complaints from residents they did not yet have PPS cards and had not been assigned a GP. For this category of people, it is practically impossible to access services that would assure that their physical and mental health needs were met.

Annex: Table of Freedom of Information Requests and Records Released

FOI Records: Department of Children

Scope	Records Released	Notes
Membership, Terms of Reference of the External Advisory Group and Programme Board Documentation (November 2021 FOI Request)	Records available here (68 pages).	Request made on 15 November 2021. Records released 11 January 2022.
Membership, Terms of Reference of the External Advisory Group and Documentation (July 2022 FOI Request)	Records available here (89 pages)	Request made on 27 July 2022. Records released on 25 August 2022.
DCEDIY discussions etc with the Housing Agency and/or local housing authorities regarding the housing of protection applicants from February 2021 to November 2021.	Records available here (19 pages)	Request made on 15 November 2021. Records released on 21 December 2021. [Note CCMA Allocation files were corrupted and could not be opened, but these are included in the Department of Housing release records].

FOI Records: Department of Children

Scope	Records Released	Notes
Daily Expenses Allowance and Budget 2022	<u>No records available (context to this FOI request here).</u>	<p>Request made on 05 November 2021.</p> <p>FOI decision indicating no records on 08 February 2022.</p> <p>Internal Review requested on 24 February 2022. Response to internal review, indicating no records, on 08 September 2022.</p>
Applicants who are vulnerable and White Paper Implementation (December 2021 request)	<u>Records available here (549 pages)</u>	<p>Information mainly relates to the discussions on accommodation (generally) for persons seeking protection. The documentation mainly pertains to drafts of the White Paper.</p> <p>Request made on 07 December 2021.</p> <p>Continuous follow up on non-response up to April 2022.</p> <p>Application to the Information Commission accepted on 08 August 2022.</p>

FOI Records: Department of Children

Scope	Records Released	Notes
		Records released 19 August 2022.
		Application to Information Commissioner discontinued.
		<u>Questions related to scope of FOI request remained unanswered</u> at date of writing (01 November 2022).
Applicants who are vulnerable and White Paper Implementation December 2021 to September 2022 (September 2022 request)	<u>Records available here</u> (10 pages)	Request made 08 September 2022. Records released 30 September 2022. <u>Confirmation</u> of this being extent of records 18 October 2022.
Programme Board records November 2021 to July 2022	<u>Records available here</u> (92 pages)	Request made on 28 July 2022. Records released on 25 August 2022.

FOI Records: Department of Justice

Scope	Records Released	Notes
Labour market access permission and the White Paper	Records available here (86 pages).	Request made on 16 November 2021, refined on 26 November 2021. Notification of time extension. Records released on 02 February 2022.

FOI Records: Department of Social Protection

Scope	Records Released	Notes
Budget 2021 and Daily Expenses Allowance	No records identified (5 pages).	Request made on 05 November 2021 and withdrawn on 10 November 2021.
International Protection Payments Policy I	Records available here (682 pages).	Request made on 15 November 2021. Records released on 03 December 2021.
International Protection Payments Policy II	Records available here (60 pages).	Request made on 20 July 2022. Records released 16 August 2022.

FOI Records: Housing Agency

Scope	Records Released	Notes
Records relating to the DCEDIY, Dept. of Housing and Housing Agency (White Paper Implementation Working Group) 11 May 2021 to 23 February 2022	Records available here (63 pages).	Request made 23 February 2022. Records released 29 March 2022.
Records Relating to Housing Agency Policy Papers	Records available here (141 pages).	Request made 01 August 2022. Records released 31 August 2022.

FOI Records: Department of Housing, Planning and the Environment

Scope	Records Released	Notes
Records relating to the White Paper Implementation Working Group 01 March 2021 to 23 February 2022.	Records available here (144 pages).	Request made on 23 February 2022. Notification of time extension. Records released on 28 April 2022.
Records relating to the White Paper Implementation Working Group up to 04 August 2022.	Records available here (81 pages)	Request made on 04 August 2022. Notification of time extension. Records released 27 September 2022. Note the limitations of these particular FOI records here.

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All views expressed in this report are those of the respective authors in relation to the elements of the report that they individually completed. The analysis presented in this report may not necessarily reflect the views of Nasc, the Steering Committee and/or any organisations the authors are associated with.



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