



**To Roderic O’Gorman, Minister for Children, Equality, Disability, Integration and Youth**  
by email to: [roderic.ogorman@oireachtas.ie](mailto:roderic.ogorman@oireachtas.ie), [minister@equality.gov.ie](mailto:minister@equality.gov.ie)  
June 19, 2023

**Re: Ireland Says Welcome - a Member Group of Comhlámh, appeal to Minister O’Gorman to address disparities in access to housing and social supports for marginalised groups, that are leading to a degradation in social cohesion.**

Dear Minister,

You may recall our letter emailed to you on World Refugee Day 2022, appealing to you to act to prevent a multi-tiered International Protection system and address housing challenges fairly and humanely. Our issues were subsequently raised in the Dáil by Catherine Connolly (TD).

We acknowledge the achievements of your department, in welcoming in excess of 80,000 Ukrainians since the invasion of Ukraine, and we commend your ability to currently house 55,316 people<sup>1</sup> from Ukraine in state accommodation. However, this year, for the first time in our memories, 1,542 people<sup>2</sup> seeking asylum were made street homeless on arrival with no access to homeless services. This represents about one third of people who sought asylum in Ireland this year.

The housing and immigration policies of successive governments have resulted in the violation of human rights of vulnerable people, and have caused social injustice widely across Irish society. Successive government’s policies have had a negative effect on social cohesion, predominantly driven by the housing crisis.

We are writing on this World Refugee Day, 2023 to raise our current concerns about:

- the standards of accommodation and social supports experienced by vulnerable people, particularly those in the International Protection System, and also Irish citizens.
- the impact this has on wider society

### **1. Accommodation State Supports**

The most vulnerable in our society, including International Protection applicants, Temporary Protection beneficiaries (Ukrainians), refugees and Irish citizens are residing in temporary accommodation in hotels, institutions and repurposed buildings, run for profit, by the private sector, in tents and on the streets.



Temporary accommodation often entails shared rooms, (families sharing rooms and strangers sharing rooms, in tenement-like conditions), a lack of privacy and autonomy, a lack of cooking facilities, stigma and isolation. Examples of people living in temporary state-provided accommodation in Ireland include

- people in the international protection system in repurposed buildings/hotels/B&Bs/institutions
- homeless parents and children in one room in B&Bs
- street homeless people in rotating beds in dormitories in homeless hostels

We understand the breakdown of people in Direct Provision and temporary accommodation for asylum seekers/temporary protection recipients is as follows:

- 2,094 children and 4,983 adults<sup>3</sup> in **Direct Provision**, accommodating **people seeking asylum and people with refugee status** (managed by your department)
- 2,458 children and 11,735 adults<sup>4</sup> in **Emergency/Transit Accommodation**, accommodating **people seeking asylum and people with refugee status** (managed by your department)
- 16,994 children and 38,245 adults<sup>5</sup> in **Short Term Accommodation**, accommodating **people from Ukraine, in Ireland under the Temporary Protection Directive** (managed by your department)

Further, there are

- 3,594 children and 8,665 adults<sup>6</sup> in **Emergency Accommodation for people experiencing homelessness, accommodating Irish citizens and people with refugee status** (managed by Department of Housing/City & County Councils)

Aggregating these categories gives:

- 25,140 children and 63,628 adults in short term state provided accommodation

Many more people who have an entitlement to housing assistance avail of various housing payments

- HAP (managed by City & County Councils)
- Rent Supplement (managed by the Dept of Social Protection).
- Host Recognition Payment (managed by your Dept, administered by the Dept of Social Welfare).

The system has become complex and multi-tiered, with different segments being advantaged and disadvantaged in different discriminatory ways.

In the spirit of the #IrelandForAll movement, we petition this government to prioritise housing all those residing in temporary emergency/serviced/managed accommodation and Direct Provision, whatever their background. In particular, we ask you, as Minister for Children, for a strategy and project plan to achieve the objective of moving all children in institutional, emergency and temporary accommodation in Ireland into homes, whatever their background or immigration status. We ask the three relevant



departments, your department, Dept. of Housing, and the Dept. of Social Protection as well as the County and City Councils to propose a joint strategy to ensure no more children fall into homelessness, and a coherent forward-looking plan to move all 25,140 children in emergency accommodation into homes. The objective should be to eliminate the institutionalisation of children in temporary accommodation and Direct Provision in Ireland.

**1.1 As Minister for Children, will you coordinate with your government partners to define and implement a joint strategy to provide homes for all children residing in temporary emergency/serviced/managed accommodation, whatever their background, in the remaining lifetime of this government?**

The multi-tiered state system has led to inequality in housing entitlements.

Although the state is currently housing 55,316 Ukrainians with no incidents of street homelessness on arrival, it is distressing to see that approximately one third of people seeking asylum were left street homeless year to date. 4,569 people<sup>7</sup> arrived in Ireland seeking asylum up to the end of May and 1,542 people seeking asylum (including at least 4 children and 3 pregnant women)<sup>8</sup> have experienced street homelessness this year, with no access to homeless services. A further 152<sup>9</sup> people seeking asylum are currently housed in tented accommodation, for example in Knockalisheen, with more tented accommodation we understand imminent in Dundrum.

Many of the people seeking asylum that were made street homeless received donations of tents and camped at the IPO office in Dublin 2. They had an entitlement to €38.80 per week, and a minority accessed additional needs payments (at the discretion of the Dept of Social Protection). We understand €50 euro vouchers weekly were proposed but information on this is scant and we have not seen evidence of even this pitiful amount reaching those in need.

The Council of Europe Commissioner for Human Rights, Dunja Mijatović, wrote to you recently stating that these accommodation standards could well fall short of the minimum standards of the European Convention on Human Rights.<sup>10</sup>

**1.2 Can you commit to no more people seeking asylum becoming street homelessness on arrival?**

We recognise constraints on the usage of some streams of accommodation. Our understanding is that an unintended side effect of the contracts negotiated with the hospitality sector is that only Ukrainians can avail of some accommodation. While empty beds exist in emergency accommodation for Ukrainians, people seeking asylum are street homeless because they cannot avail of this accommodation. We are concerned a human rights first approach was not considered when negotiating contracts with the hospitality sector, and this has resulted in structural racism.



### **1.3 Can all accommodation contracts and their governance be reviewed through the lens of a human rights first approach?**

As well as concerns on the contracts negotiated, we also have concerns on contract management. We are concerned that many people with refugee status in Direct Provision have recently received letters to vacate their accommodation by the end of this month. Although this segment at least has the same rights to a housing payment as an Irish citizen (unlike asylum seekers and temporary protection beneficiaries from Ukraine), they are also facing the housing crisis and should not be subjected to threats of mass eviction. We are also concerned about the withdrawal of accommodation rights for those who leave state accommodation temporarily<sup>11</sup>, and short-notice moves continue to be a feature of the system, indicating short lead times, or potentially late communication of known lead times. Further, there have been media reports of providers not being paid on time.

### **1.4 Does your department measure pipelines of supply and demand in the International Protection system? Can these be used for forecasting and forward planning, to eliminate short-notice moves, reserve some capacity for those who need to return to state accommodation and prevent mass evictions?**

## **2. Social Supports**

As outlined above, state care of those who are forced to avail of emergency accommodation has been outsourced, largely to the private sector. B&B and hotel staff are not trained in caring for people suffering trauma. With a few notable exceptions, the profit motive dictates how emergency accommodation centres are run, care for residents is not the priority. At its worst, we have heard reports of threats and intimidation by emergency accommodation centre managers.

A person living in Direct Provision/emergency accommodation has only one means to complain to IPAS, by emailing [IPASInbox@equality.gov.ie](mailto:IPASInbox@equality.gov.ie). We have heard numerous reports of emails being ignored or emails answered months later. The only recourse then for complaints is an onerous and lengthy appeals process.

### **2.1 Can you commit to a movement away from the private sector for accommodation provision?**

### **2.2 In the interim, can you ensure appropriate governance mechanisms are put in place for the welfare of residents e.g. complaints procedures, agreed notice periods in advance of moves, training of staff, minimum standards of accommodation etc. Profit caps on these tenders would likely result in better welfare for residents, could this be considered?**

Where people may have challenges accessing their rights, Casework services have been shown to be effective, for example in Homeless Services, Addiction Services and Disability Services in Ireland and overseas. A Case Worker assists in navigating the complex services that a person may need in order to



achieve their self-identified goals. Case Workers should be assigned to people in any form of temporary accommodation or Direct Provision who want assistance finding a home and integrating in Ireland.

Case Workers typically facilitate assessments for Vulnerabilities/Needs/Capacities so they can make referrals to the appropriate services. Care Plans are put in place to help people attain housing and the services necessary to help them achieve their self-identified goals.

Virtually no outreach happens in International Protection accommodation and so, without Caseworkers, only those who can advocate for themselves in the under-resourced system receive support. The resources available to migrants are not well documented. Building on the work of the Irish Refugee Council in mapping organisations that provide support to migrants would help Caseworkers, as a significant part of the role is sign-posting appropriate services. Further, the Goods and Services pledges in the Irish Red Cross National Register of Pledges are a potential resource that could be utilised in a Casework service offering individualised care. Although the government has funded charities and NGOs to provide some level of Casework, the service has not scaled in line with need. Charities are continuously fire-fighting live issues, with only a very small fraction of people receiving anything resembling Assertive Case Management.

The current blocks to achieving such a service appear to be primarily staffing but there also seems to be a lack of will to resource a system that offers individualised supports. We do not feel there has been sufficient alignment on essential policies, supporting technologies and standardised procedures for the stages of Casework such as Client Onboarding, Assessments, Referrals, Positive Disengagement and Monitoring and Evaluation, leading us to ask whether there are issues with the operating model.

### **2.3 Can you commit to enabling a comprehensive Casework service to help those in the International Protection System progress their individual integration journeys?**

### **3. Social Cohesion**

The use of substandard housing is a slippery slope that is continually being reframed by government. Substandard types of accommodation, from tents to the proposed 'floatels' are being normalised in an environment where we have seen 1,542 asylum seekers street homelessness on arrival in Ireland, with no access to homeless services. While the return on investment on modular housing (reported to cost €145k/unit<sup>12</sup> with an expected life time of 60 years<sup>13</sup>) appears to be justified in the current housing crisis, we consider this last resort to be a symptom of failed land management and state construction policies over successive governments. The threat of street homeless should not be used to normalise sub-standard accommodation and the threat of homelessness should not be used to reduce perceived 'pull factors' for people who may want to seek safety in Ireland. Marginalised groups with various levels of rights and entitlements should not be positioned as competing for scarce resources such as accommodation and social supports.



### **3.1 What resources are being provided to ensure communities have the resources to support new members e.g. GPs, teachers, family resource centres etc.**

When government actions and communications stigmatise, for example, male asylum seekers, this risks legitimising divisive views held by a small number of fringe extremists in Ireland. Ireland has been lucky that the rise of the far right has been fractured, and the individuals involved can not be taken seriously as leaders of a far right movement. However, where the state fails to engage with communities, these extremists agitate and exploit fear in marginalised communities. Successive governments have avoided community engagement, apparently for fear of triggering protests in communities or attacks by the far right. We have seen arson attacks on potential Direct Provision centres as far back as 2018<sup>11</sup>. More recently we saw the attack on a camp of street homeless asylum seekers at the International Protection Office in Dublin 2, and in May this year we saw an unauthorised road block conducting inspections outside an emergency accommodation centre in Co. Clare.

### **3.2 What is the government's communication strategy to engage with local communities when emergency accommodation centres are opening in their areas?**

In closing, we would like to recognise the strength of our brothers and sisters in the International Protection system who sustain themselves and support each other through their challenging living conditions. As well as this peer support, many community workers, public servants, hosts and volunteers are generously acting in solidarity to fill the gaps in social supports. Family Resource Centres, charities such as the Movement of Asylum Seekers of Ireland, Ukraine Action in Ireland, the Irish Refugee Council, IHREC, Crosscare, the Red Cross, Doras and Nasc are helping people to access their rights and entitlements and supporting their client's efforts to achieve social inclusion here in Ireland. This gives us hope that with strong leadership and improved management of resources, Ireland can meet our International Protection obligations in a humane and fair way.

We look forward to a timely response and would welcome an opportunity to discuss any of these topics with you.

Regards



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Niamh Phelan, Eimear Gavin, Miranda Arkwright, Sally Roddy

On behalf of Ireland Says Welcome, a Member Group of Comhlámh.

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