Comprehensive Accommodation Strategy for International Protection Applicants

Department of Children, Equality, Disability, Integration and Youth
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1. Introduction

Ireland has long stood by the principle in international and European law that those who need to seek refuge must be afforded the right to do so – humbly, fairly, and according to the rules of the international system we strive to uphold.

This principle has been tested in recent years, by an unprecedented combination of contributory factors – some once-off, others due to fundamental shifts in migration patterns over the longer term. Together, between those fleeing the war in Ukraine and the increasing numbers of people seeking International Protection (IP) in Ireland, the State has mobilised to provide accommodation to over 100,000 additional people in 24 months, or 2% of the State’s population.

The present International Protection reception and accommodation system was designed to cope with approximately 3,000 – 4,000 arrivals per year. Even before the War in Ukraine, or the increase in IP applications, this system was not one designed to cope with the reality of migration in current times, a fact recognised by the development in 2021 of the *White Paper to End Direct Provision.*

After an additional and unexpected 25,000 people have sought protection in the last two years, along with 75,000 people from Ukraine who also were accommodated from the same commercial sources, the system is under severe strain. The State has had to necessarily adopt a reactive, crisis-led approach.

As the assumptions underpinning the White Paper have shifted dramatically, there is now an urgent need to implement a revised approach in order to move from a wholly reactive response, fully reliant on commercial providers, to a planned, mixed-accommodation approach centred on a large, core State-owned supply, concurrently delivering contingency, short term, and long term accommodation solutions, along with accommodation for vulnerable applicants. Crucially, this is a plan which must:

- Provide a realistic and deliverable pathway, year by year, to give the State full management over the stock of International Protection accommodation – in terms of location, distribution, costs, delivery of services and consideration of impact on communities.

- Rebuild confidence that the State is adopting a fair and reasonable approach in the provision of temporary accommodation, of humane national standards, to those who need it under International Protection law, working in tandem with the application of a fair, rules-based, IP decision making process.

- Demonstrate that a clear objective of the plan is fairness and equity in terms of the distribution of accommodation across the State, with transparent and justifiable allocation criteria, and shows how this can be achieved progressively over time.

- Bolster significantly the ability of the State to foster integration and inclusion, build understanding and lead out with planned, structured and transparent engagement with local communities.
Delivers significant cost savings for the taxpayer.

Due to the significant challenges outlined, the Department is currently unable to offer accommodation to new single male applicants. There is a legal obligation on the state to meet the requirements under the EU Recast Reception Conditions Directive to provide accommodation to all who request it. For a second time this year the state is unable to fulfil these obligations.

In this context there is a recognition that the underlying assumptions on which the White Paper was based needed to be re-examined as it was originally based on 3,500 new arrivals each year. In this regard a review of the implementation approach for the White Paper was initiated which has included inputs from the White Paper Programme Board and the External Advisory Group.

The review has resulted in the development of a new Comprehensive Accommodation Strategy for IP applicants. The strategy seeks to address the current accommodation shortfall, maintain the fundamental principles of the White Paper, while reforming the system over the longer term to ensure the State will always be able to meet its international commitments.

As with the White Paper, the Comprehensive Strategy rests on three pillars: Accommodation, Integration and Supports. The principles set out in the White Paper are also maintained:

- **Integration from day one:** An approach that seeks to encourage integration from day one, respond to vulnerabilities, and to place people on the most successful pathway possible towards an independent life in Ireland, should their application prove successful.

- **Human rights and equality based:** The rights of applicants will guide the delivery of the model, with a particular focus on children’s rights, dignity, respect, privacy and on access to the right information and support at all stages of the process. Starting shortly, a new International Protection Child Payment will be provided to all applicant families in the system, which will provide an increase on the weekly allowance presently granted in respect of children.

- **Delivery of high standards:** The new model will be one characterised delivery of best possible standards of support, services and assistance, which all international protection applicants can expect to receive. Owing to the unprecedented increased in applicant arrivals, it has been challenging to deliver necessary standards of accommodation. The delivery of new State-owned and commercial accommodation to specific standards at scale will allow for an overall increase in standards of support provided.

- **Professional:** Delivery will be undertaken by organisations experienced in delivering accommodation and / or services and understand the need for equality, diversity, cultural competence and the particular requirements of those fleeing conflict and / or who have experienced trauma.

- **Community engagement:** Communities and not-for-profit organisations will be actively encouraged to become engaged in supporting applicants and their families at each stage.
of the process, the inter-agency working groups will provide the framework for this engagement at the local level.
2. New Accommodation Strategy

Revised Larger Capacity Approach

The Department projects that a system with capacity for up to 35,000 by the end of 2028, assuming that an average of 13,000-16,000 persons arrive between 2024 and 2028 and that persons with status move from their accommodation after a specified time (currently one year after grant of status).

It is proposed to scale up to the 35,000 capacity through a blended model of State owned accommodation, commercial accommodation, and temporary commercial emergency accommodation. At its core, the delivery of State owned Reception and Integration Centres and Accommodation Centres will form an integral part of the new model and will look to deliver 14,000 state owned permanent beds. A reliance on commercial providers will also continue into the short and medium term.

In order to deal with the demand led nature of the system, the commissioning of emergency commercial accommodation will continue to be a feature in the short to medium term. This accommodation will be contracted on shorter-term basis and if numbers drop can be decommissioned as contracts expire. It is planned that as new State owned and permanent commercial accommodation comes on stream the use of this emergency accommodation will reduce.

It is the intention of this new Strategy to end the use of unsuitable accommodation options currently relied upon, such as the sole hotel remaining in a given town. The degree of control given to the State by the creation of core supply of State-owned accommodation, of both emergency and permanent options, will increase as supply is delivered, re-establishing strategic direction over the accommodation type, location and dispersal pattern.

Once sufficient State owned accommodation has been delivered over the coming years, and emergency accommodation reduced substantially, the Government may, at that point, seek to reduce further the proportion of remaining permanent accommodation delivered by commercial providers and move to a fully or predominately State owned system.
By the end of 2028 it is estimated that a breakdown of the accommodation offering will be:

<table>
<thead>
<tr>
<th>Accommodation Type</th>
<th>Bed Capacity</th>
<th>Ownership</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reception and Integration Centres and Accommodation Centres, at national standards</td>
<td>Up to 13,000</td>
<td>State Owned</td>
</tr>
<tr>
<td>In-Community Accommodation for vulnerable persons, at national standards.</td>
<td>Up to 1,000</td>
<td>State Owned, operated in partnership with NGOs.</td>
</tr>
<tr>
<td>Contingency Accommodation, at national standards</td>
<td>Up to 11,000</td>
<td>Commercial Providers</td>
</tr>
<tr>
<td>Emergency Accommodation</td>
<td>Up to 10,000</td>
<td>Commercial Providers</td>
</tr>
</tbody>
</table>
Standards of Accommodation

The National Standards provide a framework for person centred, high quality, safe and effective services and supports for people living in IP accommodation. The National Standards ensures quality of care and consistency. They also provide IP applicants with a guide as to what they should expect during their time in IP accommodation.

The National Standards are set out within a framework of ten themes. The themes are intended to work together and collectively describe how any IP accommodation that is provided should be delivered including being of high quality and deliver services, which are human rights and equality based. The ten themes are:

1. Governance, Accountability and Leadership
2. Responsive Workforce
3. Contingency Planning and Emergency Preparedness
4. Accommodation
5. Food Catering and Cooking Facilities
6. Person Centred Care and Support
7. Individual, Family and Community Life
8. Safeguarding and Protection
9. Health, Wellbeing and Development
10. Identification and Response to Special Needs

Distribution Model

As committed to originally the new model will be designed to take account of local pressures and to facilitate the necessary planning for service provision. A set of criteria will be developed to ensure, as much as possible, an equitable geographical distribution of applicants and accommodation locations across the country. The criteria will take account of a range of factors including current IP and BOTP numbers, population density and availability of public service. Cross government collaboration will be required to develop and agree the set of criteria.

Contingency Planning

As part of a strategic and planned response to the accommodation of IP applicants over the next number of years contingency planning will be key. Periodically a process will be carried out, in collaboration with other Departments, to assess current and future arrival trends. This will allow the state to project estimated arrivals over the coming six to 12 months and help the system to manage with the uncertainty and its demand led nature and address future needs including an ability to expand bed capacity quickly as required. Continued capital investment on the area of IP will be required to make this contingency planning approach successful.
Approach for Delivery

Reception and Integration Centres and Accommodation Centres

In order to achieve the more permanent model of accommodation, the delivery of State Owned Reception and Integration Centres will still form an integral part of the new model. Delivery of these centres will be through a blended approach of both building and purchasing.

Accommodation in a Reception and Integration Centre will be available to each IP applicant for at least 6 months. During that 6 months each applicant will have access to a programme of orientation integration, and supports as described in the White Paper.

Reception and Integration Centres will be delivered through a blended approach.

- **Purchasing:**
  - Expressions of Interest (EOI) offers for existing properties/buildings in turnkey condition.
  - The identification of properties/buildings/projects for purchase through an Expression of Interest (EOI) process and direct sourcing.
  - Properties that require upgrading/renovation.

- **Turnkey Delivered:**
  - Projects/properties that can be built/developed to a required specification and delivered in turnkey condition

- **Delivery on State Owned sites:**
  - Project managed approach for existing state owned sites will be further developed to increase capacity and build upgraded Reception and Integration Centres. Three sites are currently under consideration and Rapid Build will be initiated dependant on proposed technical considerations.
  - Additional State owned sites will be sought to directly deliver new Reception and Integration centres, carried out through Design and Build methodology.
  - Current state owned IPAS centres will be upgraded to increase capacity were possible.

Accommodation Centres will be required for individuals who have completed the six month orientation programme in a RO Centre but are awaiting a decision. Applicants would move to Accommodation Centres after six months and would remain in these centres until they exited the protection process. Those granted status would be able to remain in Accommodation Centres for a specified period following the grant of status (currently 12 months).

The delivery of these Accommodation Centres will utilise the existing IPAS centres (a mixture of state owned and private providers) which are compliant with the National Standards and the
White Paper. The programme already in place to purchase properties for White Paper Phase Two will also continue with a focus on larger properties.

Accommodation Centres will also be delivered through a blended approach.

- **Commercial and Private Providers**
  - The utilisation of existing IPAS centres following an assessment of their physical and social infrastructure will be required to improve standards and upgrades in these accommodation settings to meet white paper standards. It is envisioned that 9,000 persons will be accommodated under this strand. (2844 beds are currently contracted in apartments).

- **State owned Accommodation**
  - The purchase of larger units for people transitioning from Phase One accommodation.
  - Accommodation in the community purchased for those with additional vulnerabilities and needs (37 houses currently with a capacity of up to 200 beds).

### Current & Future International Protection Accommodation Portfolio Overview

In order to deal with the demand led nature of the system the commissioning of emergency commercial accommodation will continue to be a feature in the short to medium term. This accommodation will contracted on shorter-term basis and if numbers drop can be decommissioned as contracts expire. It is planned that as the state owned accommodation comes on stream the use of this emergency accommodation will drop.
Accommodation for Vulnerable Cohorts

Under the Revised Accommodation Model, families and the most vulnerable will be prioritised for accommodation in the community, in specialised accommodation that may be supported by specific NGOs – e.g. accommodation for victims of trafficking.

Near Term Strategy

As outlined previously within this memo, the scale of growth over the past 2 years in tandem with the influx of Beneficiaries of Temporary Protection, has resulted in the State moving from accommodating 7,000 people seeking refuge to accommodating over 100,000. The State has now reached a critical juncture, whereby over 1,000 adult males are awaiting offers of accommodation, with this number set to increase. There is also an increasing likelihood that families, including women and children could find themselves without an offer of accommodation in the coming weeks or months.

To move out of this crisis and do so in a manner that aligns with the structures and principles set out in the ‘Revised Accommodation Model’ a Near Term Strategy for delivery of additional accommodation throughout 2024 and into 2025 has been developed.

The key strategic deliverables are;

1. Conversion of Commercial properties to IP accommodation, with a focus on empty office blocks
2. Acquire and utilise HSE and State lands to develop fast prefabricated and other modern methods of construction to quickly bring on stream accommodation
3. Targeted purchases of medium and larger properties in turn key or near turn key condition

Conversion of commercial properties

The recent Central Bank ‘Regulatory Supervisory outlook report 2024’ pointed to vulnerabilities in the commercial real estate market, driven in part by hybrid and remote working patterns and the impact on lending costs of recent ECB rate increases. Research has indicated that some Counties have commercial vacancy rates of 15% or higher. There is an opportunity for both the State and commercial real estate sector to benefit and convert commercial properties into International Protection Accommodation

Why this option?

Many of these properties are based in urban centres with access to services. By utilising this option, there is no negative impact on the residential market, will have no impact the tourism
industry and will be investing in a sector of the economy that is under risk of experiencing a property crash.

Time frame for delivery can be anything from 5 to 9 months, which ensures a supply of solutions in 2024.

Alignment with Revised Accommodation Model

These properties would fall within the ‘Contingency Accommodation at national standards’ category under the RAM. Properties would be delivered by the commercial sector and leased to the State for 2 to 4 years. Existing Statutory Instruments would enable this change of use.

Acquire and utilise HSE and State lands to develop fast prefabricated and other modern methods of construction to quickly bring on stream accommodation

The Department has recently agreed to lease two locations from the HSE, along with a site from the Department of Justice. Further sites/properties are being explored. These sites/properties allow for the construction of fast prefabricated units to bring on stream State owned accommodation in 2024.

Why this option?

Virtually all EU Member State utilise fast modern methods of construction to add capacity to their systems in times of crisis. It is the most cost effective solution and allows for the use of Ministerial Orders on State lands for exemption from planning to deliver solutions rapidly.

This method also brings on stream accommodation that would otherwise not have come from the commercial sector. Due to the slightly longer lead in time to delivery, this State construction model allows ample time to engage with local communities.

Alignment with Revised Accommodation Model

These State owned and built solutions will fit within the ‘Reception and Integration Centres and Accommodation Centres, at or above national standards’ category. Some of the early prefabricated solutions may not be to the Reception and Integration model criteria as speed of delivery will be key. However, units can be reconfigured in time when the system is stabilised to align with the state owned RAM category.
Targeted purchases of medium and larger properties in turn key or near turn key condition

In the short to near term, this option would allow the State to bring on stream larger turnkey properties without the complexity of construction. This would be most effectively delivered through the previously mentioned Expression of Interest process to allow the private sector to offer a multitude of solutions which the State would purchase outright.

Why this option?

State purchased solutions are far more cost effective than the current lease model, with capital pay back in the region of 4 years (sometimes less). This option allows developers who do not wish to lease and run a converted office block, but would undertake conversions and sell to the State to do so. Other examples would include renovated properties that have fallen out of commercial use and other larger units that are not economically viable.

Alignment with Revised Accommodation Model

These State purchased solutions will fit within the ‘Reception and Integration Centres and Accommodation Centres, at or above national standards’ category.

Many, if not all of these properties will fall within this category and ensures near perfect alignment with short term crisis solutions and long term strategy outlined in this memo.

Selection criteria

Building on State lands is somewhat dependent on what lands/properties are offered by Departments/Agencies. As such, this Department will not have significant flexibility in terms of locations.

However, under the other three categories, whether purchasing or leasing, and on the assumption there will be more viable offers than will be required the following criteria will be applied.

1. Areas within a high density of IPs/BOTPs already will be deprioritised
2. Target larger urban locations
3. End reliance of hotels that are the ‘last hotel’ or last amenity in a community
4. A priority on speed of delivery
5. Ensure a cost benefit to the State, especially on purchased properties

As the State moves to a more stable footing and there is over 10% spare capacity in the accommodation portfolio and there is a stable pipeline of accommodation in the medium term, the above criteria will be applied to those properties currently in the accommodation portfolio with a view to ending contracts.
This strategy will set the state on a path to developing a more planned approach in the delivery of IP accommodation. It will allow a move away from the use of emergency type settings like hotels, provide time and space for services to ramp up as needed and thus lessen the impact on communities. This strategy will take time to embed and it’s successful delivery will be hugely dependent on the following key enablers being in place:

**Key enablers:**

1. Capital funding – the State build and purchase options requires Capital funding to support both build and purchase options
2. Extension of SI 376 of 2022 – change of use of properties - from expiring in December 2028 to expiring in December 2030 to encourage the commercial sector to invest in office conversions.
3. Support of Local Authorities and other organs of the State in delivering solutions on the ground.

**Specialist and Technical Expertise**

To deliver on this ambitious scale of activities, it will be necessary to secure technical capacity and capital programme expertise to undertake the scale of programme needed to address the current accommodation needs. Formal partnership with relevant public agencies under which they will take responsibility for specific aspects of delivery of the capital programme will be required. This will ensure that the essential skills and expertise including procurement, housing, construction, and planning, are available to the department to deliver on large-scale multi-strand construction programmes. Additionally the Department will seek to advance technical services with external project management companies, which will include the expertise of Private Sector design companies and build contractors.

The partnerships developed will form the basis for the structures that will be required if a Migration Agency is set-up.
3. Key Benefits

With current arrival numbers anticipated to continue over the coming years, a strategic and planned response is required including scaling up the investment in capital projects, to ensure the State is meeting its statutory obligations under the Recast Reception Conditions Directive, which Ireland transposed into law in July 2018.

By adopting the mixed-accommodation plan set out, the Government will begin to gradually move away from a reactive, crisis response, ultimately permitting the State to:

- Regain long-term certainty over accommodation availability by creating a core, static State-owned asset and incur very significant savings over current expenditure allocated to commercial providers.
- Adjust its commercial accommodation stock as required to meet the demands of incoming arrival rates and potential changes in length of stay of applicants within the system.
- Gain far greater degree of control over the geographic distribution, allocation and dispersal of applicants.
- End reliance on opening new properties in unsuitable locations and/or properties entailing significant adverse impact in local communities (i.e. use of the sole hotel in a given town)
- Gain much greater lead-in time to the opening of new centres, allowing for enhanced and effective local communication, and development of integration linkages.
- Plan more effectively for delivery of increased public services, where possible.
- Ensure compliance with EU and International legal obligations, and protection from adverse legal decisions.
- Ensure delivery of standards uniformly and end reliance on substandard accommodation and/or unscrupulous providers.
4. Communications

While the proposals set-out a revised pathway for establishment of a new International Protection Support Service and are intended to achieve a more sustainable model of accommodation and supports for IP applicants, this will take time. There will be a requirement for a broader communication strategy that takes account of the short, medium and long terms goals of the new approach, both targeted – at local community level, and broad-based thematic – at national level.

There will be a strong focus on community and local engagement including engaging directly with elected representatives, relevant Local Authorities, and other entities and individuals. This will help to improve the flow of information regarding arrivals into areas and to help equip local communities with the accurate information required to help them understand the current situation, to put in place structures to ensure planning for the provision of essential and support services, like healthcare and education and to assist with the welcome and integration process for new arrivals.

With delivery of sufficient State-owned scale, it will in due course become possible to plan for longer lead-in times in advance of opening new accommodation. This will allow for planned, structured engagement to be implemented where necessary.

The new strategy will be supported by wider communications campaigns at both local and national level.
5. Timelines

An initial indication of timelines for delivery of this new strategy is displayed in the graph below. These timelines however will be dependent on market appetite and capacity and, critically, the availability of required capital funding for the programme. More beds may be delivered in year one and year two of the programme if opportunities arise that can be delivered at an accelerated timeline.