JRS Ireland - Submission to Day Advisory Group

1. Asylum Application and Length of Time
"As we kill time so time kills us"

There has been a significant and sustained increase in new asylum applications over the past 3 years placing pressure on IP accommodation and case processing.

The biggest single issue facing asylum seekers is length of time. When the McMahon Working Group started, 50% of persons in DP were 5+ years in the system and the average duration in DP accommodation was 48 months. Around 2,000 long stayers had their status resolved in the 18 months following publication of McMahon. However, the Single Procedure was hamstrung by a failure to resolve fully legacy cases as recommended, resulting in 4,000 cases transferred to the IPO at inception in January 2017.

A key finding of McMahon was that it costs significantly less in both human and financial terms to process decisions than to accommodate people long term. In the experience of JRS, all the most adverse effects of living long term in DP (poor mental and physical health; isolation; boredom; loss of skills and obsolescence of qualifications; negative impact on child development and family life; and the creation of dependency) are functions of time and exacerbated by the length of time in the system.

Table 1: Trends in Asylum Applications in Ireland

	2015	2016	2017	2018	2019 (Nov)
New Applications	3,276	2,224	2,926	3,673	4,487
MDU Status Grant	562	727	768	1034	
Recognition %	17%	32%	26%	28%	
Duration to First Interview					15 months

Table 2: Length of Time in DP Comparison

	McMahon Report 2015	Q1 2019	October 2019
Less than 1 Year	23%	44%	41%
1 – 2 Years	9%	23%	26%
2 – 3 Years	7%	13%	11%
3 – 4 Years	8%	13%	10%
4 – 5 Years	9.5%	4%	7%
5 Years or More	43.5%	2%	5%
Average Duration	48 months	24 months	23 months (Est)

Although there have been improvements in case processing, asylum applicants still spend too long in the system. To realise the McMahon aim of processing claims to completion within a 12 month timeframe, a number of outstanding recommendations improving the protection process need to be fully implemented:

a. Access to Early Legal Advice produces better quality decisions for applicants and reduces costly and time consuming legal challenges. However, the quality, quantity and consistency of legal advice needs to be improved and this requires significant extra resources to be invested.
b. Decisions at first instance are delivered on average in 15 months and 9 months for prioritised cases. Appeals are taking 6-9 months to determine, followed by a number of months to complete the PTR Review. The average processing time to completion is in > 24 months. At times of higher application numbers, there will be a corresponding need for additional case processing resources to avoid backlogs and delays building.
c. The principle that people should not be longer than 5 years in the system was unanimously agreed under McMahon. JRS strongly advocates for continued recourse to the McMahon mechanisms to proactively resolve cases, avoiding people spending years 'with no end in sight'.
d. Asylum applicants not knowing where they are in the process is hugely frustrating and negatively impacts their wellbeing. Relevant recommendations (e.g. 3.379) re communication remain unimplemented.
e. There is a need to eliminate bureaucratic delays that prolong people's stay in direct provision – in 2019, successful protection applicants have been waiting 6+ months in many cases for MDU to issue grant letter.

2. Living Conditions in Direct Provision

"Children born in this system do not know the difference between a house and a room."

The biggest single factor that has changed post McMahon is the accommodation crisis. Significant increases in new applicant numbers coupled with the challenges faced by persons with status seeking suitable accommodation in the community has led to a situation where IPAS accommodation is full. Throughout 2019 the numbers of new applicants being placed in emergency accommodation grew exponentially. 1,600+ persons are currently in Emergency Accommodation.

Table 3: IPAS Accommodation

	2015	2016	2017	2018	Oct 19	2019 (Est)
Capacity in DP	5,449	5,230	5,503	6,148	6,310	6,550
Living in DP	4,696	4,425	5,096	6,106	7,537	7,600
Occupancy %	86.2%	84.6%	92.6%	99.3%	119.4%	116.0%
Living in EA	-	-	-	337 (Jan 19)	1478	1,600

The accommodation crisis has had a number of negative consequences:

a. Emergency accommodation is an unsuitable alternative to DP and vastly more expensive.

b. Acts as barrier to implementing key McMahon recommendations in relation to living conditions, additional living space for families and progressive recourse to single rooms for long stayers in the process.

c. Recourse to use of remote locations with strong public opposition emerging in a number of areas (Oughterard, Achill, Ballinamore, Moyville and Rooskey). These protests have been inflamed by poor communication, a failure to address local concerns and also regrettably anti-immigrant sentiment.

d. Failure to adhere to the National Standards developed over a two-year period. For instance, the recently opened Clare Lodge has men sleeping in bunk beds in shared rooms. This contravenes Standard 4.2.10 and is a regression from the own door accommodation available in other new centres such as in Borrisokane.

The other major McMahon living condition recommendation was around food. The rollout of communal and self-catering has been piecemeal and inconsistent. Although half of the residents in DP centres (not including emergency locations) can now can cater for themselves in some form, implementation almost 5 years after the publication of the report is too slow. The rollout of independent living model is welcome, but a failure to do so evenly deepens inequality in living conditions between centres.

3. Asylum Seeker Supports

"If someone spends 3–5 years in direct provision without proper education, work training, what do you think that person will become even after he or she is given permission to stay in the country?"

a. Right to Work: The biggest single improvement to reception supports is the right to work at 9 months - although best practice and integration research suggests that the earlier the access to the labour market the better for long term integration of protection applicants. Also, an effective right to work is being undermined by practical barriers, including a denial of access by protection applicants to driving licenses and the difficulties in opening bank accounts.

b. Access to Education: There is a significant gap in terms of access to education for adult asylum seekers - especially in terms of barriers to PLCs and further education courses. JRS Ireland advocates enhanced access to these courses on the same basis as Irish citizens subject to available capacity.

c. Vulnerability Assessment: The absence of a vulnerability assessment is a significant gap in identifying and responding to the specialised health and other needs of individual asylum applicants.

d. Transition: A two tier system of case processing and accommodation and integration supports emerged in the treatment of asylum seekers arriving in Ireland and those relocated/ resettled through EU programs.

Appendix 1: Recommended Considerations for Long Term Approach

Protection Process – Issue of high quality final decisions on asylum claim within 12 month timeframe

1. Average case processing time is 24+months at the present time. The IPO and IPAT will have to receive significant extra case processing resources if these durations are to be reduced to 6, 4 and 2 months respectively to enable a final determination within 12 month timeframe.
2. The quantity, quality and consistency of early legal advice for applicants should be significantly enhanced. At the present time new applicants are experiencing delays in being assigned legal assistance due to the significant increase in demand arising from greater new applicant numbers.
3. There are 2,500 cases 2+ years in the process (1,650 more than 3 years) which should be resolved expeditiously. McMahon mechanisms could be adapted to resolving these longer stay cohorts.
4. There should be a rolling process to review longer stay cohorts with the aim of resolving the status of longer stay cases where practicable to avoid costly backlogs and delays developing.
5. Rapid mobilisation of additional case processing resources to meet spikes in new application numbers.
6. Improved communication with applicants at all stages in the process especially around timeframes for interviews and decisions with case processing bodies.
7. Fully implement outstanding recommendations to the improve protection process, the quality of decision making and the experience of children and vulnerable applicants seeking asylum.

Living Conditions – Own Door Independent Living Model enabling people to live with dignity in the process

1. Withdraw from recourse to emergency accommodation as soon as practicable.
2. Plan and build IPAS accommodation capacity that can respond in a timely manner to spikes in applicant numbers.
3. National Standards must be fully incorporated in all new contracts.
4. Develop and rollout of truly Independent Living Model with own door accommodation.
5. Ensure National Standards are fully implemented, consistently delivered and independently inspected in all IPAS accommodation.
6. A consultation and resource plan should be developed and tailored for each community that is envisaged to accommodate asylum applicants. Proactive engagement with communities is required to allay legitimate fears and to address local concerns, especially impact on public service provision.

Asylum Seeker Supports – Comprehensive reception and integration supports responsive to the needs of applicants from the moment of arrival and building connections with local communities

1. Ensure all new applicants go through Balseskin to ensure proper orientation and linking to public services at the start of the process.
2. Solutions found to practical barriers to an effective right to work, in particular, issuing driving licenses and facilitating the opening of bank accounts for asylum applicants.
3. Reduce waiting period for labour market to access to 6 months or less in line with EU best practice.
4. Enhance access to adult and further education for asylum seekers especially where there is capacity in the system. Do not charge non EU fees when applicant education is sponsored privately.
5. Ensure vulnerability assessment is implemented and resources allocated to meet the specialised health and other needs of vulnerable protection applicants.
6. Incorporate the needs of asylum seekers and building links with communities into local integration strategies and resource implementation.
7. Provide a consistent model of resettlement supports for persons granted status/ leave to remain and IRPP beneficiaries. This should also be reflected in national housing policy, which should include persons granted status/ leave to remain in its planning going forward.

JRS Ireland Fáilte Project – Reception, Orientation and Wellbeing Supports

1. Purpose

The purpose of this paper is to briefly outline the recent experience of JRS Ireland in the provision of reception and orientation supports to protection applicants; highlight progress made towards creation of a one-stop-shop service in the Balseskin Reception centre; and contribute to the discussion of the Day Advisory Group around the provision of holistic supports.

2. Project Background

The Fáilte Project was initially conceptualised in October 2016 by a multi-disciplinary team in the Balseskin Health Centre. Following a consultation process with the HSE, local management and NGOs, in-depth interviews were conducted with protection applicants living in Balseskin. The specific need for the provision of information and advice; opportunities to develop new skills; activities that enhance wellbeing; a more inclusive social environment; and the creation of a dedicated relaxation space arose from this consultation.

Due to its experience of delivering outreach, projects and other services in Direct Provision centres (including Balseskin), JRS Ireland was approached and appointed as the lead partner for the Fáilte Project. A Steering Management Committee and multi-disciplinary Advisory Group were also established to support project implementation.

Finally, the allocation of a dedicated resource was deemed essential to the successful implementation of the project and JRS Ireland recruited an Intercultural Project Worker to coordinate all activities and services.

3. Objectives

The Fáilte Project was established to enhance the mental health and wellbeing of persons arriving under the Irish Refugee Protection Programme and asylum seekers living in the Balseskin Reception Centre. The original aims of the project were to:

- Promote positive mental health through the provision of psychosocial education, information and advice and opportunities for discussion about the impact of stress and the challenges/opportunities of moving to a new country/culture.
- Provide training opportunities to enhance wellbeing through the development of new skills.
- Create an inclusive social environment in Balseskin aimed at improving the social relationships among the target group and other residents.

4. Project Implementation

4.1 Development of Infrastructure

The first phase of Project Fáilte was dedicated to enhancing the physical environment in the Balseskin Reception Centre. A Tranquillity Garden was designed and installed in order to provide a sense of 'space' for persons adjusting to communal living conditions and to create a more positive social environment for residents. The professional landscaped garden replaced an under-utilised playing field and is now a central amenity at Balseskin offering access to individuals, children and families. In addition, an adjacent plot of land was provided by local management for use as a community garden, which was recently enhanced during Covid-19 restrictions to ameliorate the negative mental health impact of the lockdown.

A porta-cabin was installed, overlooking the Tranquillity Garden, to act as a multi-purpose room for delivering the majority of project activities and services. The room was christened Seomra Fáilte, following a competition with residents to name the new building, the exterior was decorated with large murals produced by local artist Pat McGrath using pictures painted by resident children.

A section of the room was also reserved for the creation of a quiet indoor 'safe space' where residents could relax and feel comfortable in their surroundings. Consultations with adult and child residents in Balseskin Reception Centre and desk based research was undertaken to identify best practice in the design of the relaxation space.

4.2 Programme Design

In phase II, the development and delivery of a weekly schedule of project activities and services was undertaken. In order to design and implement a programme of information and training workshops that would enhance the wellbeing, life-skills and capacities of residents, JRS Ireland conducted the following:

- Consultation: Hosting informal and formal consultation processes with residents to assess existing service delivery and identify desired supports.
- Mapping: Engaging existing service providers delivering projects on-site and identifying gaps in provision.
- Community Outreach: Building relationships with local community groups to increase the range of activities and supports available to residents.
- Collaboration: Incorporating existing HSE staff resources and expertise into the delivery of the project.

Some of the key services delivered include, but are not limited to:

- *Information Provision*: A weekly 'Welcome Meeting' is coordinated by JRS Ireland for newly arrived asylum seekers and IRPP beneficiaries, with input from local management and the HSE, which includes a presentation of the weekly schedule of services.
- *Reception Supports:* UNHCR deliver an intensive monthly workshop on the Irish Protection Process and associated rights and responsibilities.
- *Orientation*: In partnership with University College Dublin, a series of workshops on Irish history and culture are delivered each month.
- *Wellbeing/Mental Health*: Sleep, Stress Management and Relaxation workshops are regularly provided by on-site psychology and social work staff. In addition, Capacitar workshops to create awareness of stress and develop coping mechanisms are delivered.

4.3 Resources

A 'Welcome Pack' has been developed and is provided at the weekly welcome meeting, offering basic general information and orientation (in English, French, Urdu and Arabic). 'Moving-On' booklets have also been designed for all Direct Provision accommodation centres. These are provided to transferees (once their dispersal location is known), in an effort to reduce anxiety associated with dispersal and to signpost protection applicants to key services in their new area.

Finally, JRS Ireland are in discussions with a funding body to digitize some of the key supports provided. The proposed Welcome Website would act as a one-stop-shop source of reception, orientation and integration information.

5. The Balseskin Flow Initiative

In early 2020, agreement for a pilot PPSN initiative was finaslised between IPAS, the Department of Employment Affairs and Social Protection (DEASP), East Coast Catering and JRS Ireland. Representations and input from other key stakeholders (e.g. IPO and HSE Social Inclusion) were also gathered. Due to launch in April 2020, the pilot was postponed as a result of the Covid-19 outbreak.

The planned pilot was a response to the delays experienced by protection applicants in acquiring a PPSN, which prevents access to weekly payments and medical card services. The negative impacts of such delays were acutely experienced by protection applicants residing in Emergency Accommodation during 2019 and IPAS agreed in principle, that no dispersal should happen prior to protection applicants having access to these mainstream supports.

Commencing in August 2020, JRS Ireland will operate weekly (frequency will respond to need) clinics to facilitate the completion of all relevant documentation, arrange local DEASP appointments and follow up as required. In addition, JRS Ireland will seek to operate this clinic model as a one-stop-shop, verifying that service users are accessing/awaiting access to Free Legal Aid and directing them to on-site Fáilte Project services or referring cases, as appropriate, to JRS project workers.

The flow process is intended to operate on a 4-6 week cycle and once operational, no protection applicant should be dispersed to an accommodation centre without access to mainstream State supports.

Protection with Dignity:
Roadmap to System Change

Executive Summary

June 2020

Foreword

There seems to be a new consensus in Ireland that Direct Provision, as we know it, is no longer fit for purpose. A new model is needed. An accommodation model that envisaged stays of no more than 6 months initially, was hopelessly exposed as the decision-making process lengthened, and as the stay in direct provision stretched to 5 years plus in the majority of cases. The plight of the residents became intolerable and unacceptable. Crowded living conditions, uncertainty as to the future and mandated idleness for such long periods clamoured for reform.

The *Working Group on the Protection Process, including Direct Provision*, which I was privileged to chair, was established by the Government and reported in June 2015. Although its terms of reference were limited, the Working Group condemned the shortcomings of the Irish protection system and the living conditions for asylum seekers and made 173 recommendations for reforms on many fronts.

Although the government accepted the Final Report, it failed to implement the recommendations in a timely fashion. The political will was patently absent. The misery of those who resided in direct provision ground on.

While eventually many of the Working Group recommendations were implemented, sometimes reluctantly, an opportunity to shore up the model was lost. Had the Government embraced the need for change and shown some urgency in implementing the report, direct provision might have been repaired. By the time some of the major recommendations had finally been implemented, many of the stakeholders had lost faith in the Government and had concluded, rightly or wrongly, that the existing Direct Provision model was beyond salvation and called for its abolition.

Even though the Direct Provision model in 2020 is very different and much better than what it was in 2015, and many improvements have finally been implemented, the opportunity to structurally reform the model was lost. The delay in implementation contributed to an irrevocably tarnished reputation.

The question now is what will replace it. And as the Taoiseach said recently, it is not going to be easy.

Since the Working Group report was published in 2015 there have been significant changes which make the task more difficult. In particular, one might mention the following: Brexit; the housing crisis and the consequent resort to expensive emergency accommodation; the election of Mr Trump in the USA; the emergence of an emboldened racism in social and political discourse at home and abroad; and the rise of right-wing politics in Austria, Hungary and other European countries to the east. Finally, the adverse impact of Covid-19 on the unemployment figures and on the economy in general, will only become clearer over the coming months and years.

The landscape continues to change and the Irish response to forcibly displaced persons worldwide (69.5 million according to the most recent figures from UNHCR) who seek protection in this country, must be continuously sensitive to all these geopolitical trends and developments.

I wish the Expert Group on Direct Provision under Dr Catherine Day every success in its labours.

I am confident that this study by the Jesuit Refugee Service (JRS) Ireland will be of great assistance to the group as it grapples with the problem today. JRS Ireland has long laboured in this field and this paper is the result of deep analysis and keen appreciation of historical and international contexts. It advances innovative and pragmatic suggestions worthy of serious consideration.

Dr Bryan McMahon
Former Chairperson of the Working Group on the Protection Process

Executive Summary

Momentum for System Change

1. After years of national and international critique of Direct Provision by a range of actors, there is an unquestionable momentum for system change, especially in how protection applicants are accommodated. Recently, there has been sustained opposition and protests to opening new Direct Provision centres in rural locations, alongside growing public and political disquiet about the system as a whole that deepened during the Covid-19 crisis.
2. The Taoiseach, Leo Varadkar, in a Dáil Debate stated: "*I do not believe that any member of this house is of the view that direct provision is a good system,*" adding "*I absolutely believe it should be one of the objectives of the next government to put an end to it. However, that is easier said than done.*" This system change needs to be achieved in the context of an ongoing national housing crisis while achieving compliance with National Standards coming into force at the start of 2021.
3. The Irish Times reported on 14 June, 2020, that the Direct Provision system will be ended within the lifetime of the next government. The draft programme for government says:
   "*We are committed to ending the Direct Provision system and will replace it with a new international protection accommodation policy centred on a not for profit approach.*"

McMahon to Day: Lessons Learnt

4. Five years after the publication of the McMahon Report, implementation of the 173 recommendations has been piecemeal and incomplete. The inconsistency in living conditions between centres remains and was exacerbated during 2019 by recourse to unsuitable and costly emergency accommodation. There remains a lingering sense of frustration that the Department of Justice and Equality missed an opportunity to fully implement recommendations and seize potential for change in a timely manner.
5. Undoubtedly the McMahon Report has informed policy since publication. There have been notable improvements to the system, in particular, the resolution of an estimated 2,000 long stay, five year plus cases, the commencement of the Single Procedure, the introduction of a right to work, increases to the Direct Provision allowance, development of National Accommodation Standards and the extension of the remit of the Ombudsman's Office to Direct Provision.
6. Part of the reason the system is not "fit for purpose" is that many of the key recommendations still await full implementation and resourcing, including:
   a. *Protection Process:* ongoing review and proactive resolution of long stay cases; elimination of backlogs and bureaucratic delays; access to early legal advice; improved communication with applicants at all stages of the process.
   b. *Living Conditions:* Failure to provide additional living space for families and individuals; communal catering only available to 50% of residents.
   c. *Asylum Seeker Supports:* Practical barriers to the right to work; access to further education denied; absence of adequate transition supports for persons with status.
7. Within its narrow terms of reference, the McMahon Report was focused on reform and policy. While the Government accepted the report and its recommendations, it never appointed an implementation body and never adopted a clear implementation plan. Overall, the implementation process was uneven, delayed and at times enforced e.g. the Supreme Court judgement regarding a right to work. Implementation failures left a system not "fit for purpose" to meet post-McMahon Report challenges, never mind a national housing crisis and the Covid-19 outbreak.
8. Goodwill with residents, NGO and civil society partners is needlessly squandered if negotiated transformative change agreed under joint initiatives, like McMahon or the National Standards Advisory Group, are not fully followed through as agreed.

Mechanisms for System Change

9. That international protection applicants must be treated with dignity from the moment of arrival until their claim is fully determined is at the heart of the McMahon Report and the National Standard processes. This requires a comprehensive model of supports that vindicates asylum seeker rights, enables them to live and work with dignity and supports their long term integration.
10. Time and space need to be created in the system to enable fundamental change. The challenge is to achieve systemic change in the context of a national housing crisis, while still honouring obligations to accommodate and support 7,700 persons in the process.
11. The key principles to underpin a holistic person-centred approach to receiving, accommodating and processing claims of protection applicants should be:
    a. Issuance of a full and final determination of protection claims in a fair and transparent manner within 12 months.
    b. Provision of an independent living and accommodation model to enable residents to live with dignity.
    c. Offering comprehensive asylum seeker supports from the moment of arrival.
12. JRS Ireland identifies three mechanisms as necessary for system change:
    1. Expedited Long Stayer Scheme and Enhanced Processing Capacity.
    2. Distribution Key Based Model of Accommodation Provision.
    3. Holistic Person-Centred Range of Supports at All Stages of the Protection Process.

Mechanism I: Expedited Long Stayer Scheme and Enhanced Processing Capacity

13. JRS Ireland contends there is a strong case for a new expedited Long Stayer scheme using McMahon mechanisms to eliminate historic backlogs that have hampered the Single Procedure since inception, into which 4,000 existing cases were transferred. This scheme would create space to focus case processing resources to speed up the process and deliver final determinations in 12 months.
14. Direct Provision was designed for short stays of no more than 6 months. The stated Government goal now is to deliver final decisions in twelve months. The McMahon Report and National Standards recommend progressive rights for persons who spend eighteen months in Direct Provision. In this context JRS deems long stayers as persons two years plus in the process.
15. At the end of 2019 around 2,750 cases were two years plus in the process. A new McMahon type scheme would aim to resolve these cases in a 6-month period. In addition, beneficiaries of the scheme should be enabled to access an accelerated Garda National Immigration Bureau (GNIB) registration process in order to reduce delays accessing housing supports and benefit from dedicated integration supports.
16. The most important benefit of a Longer Stayer scheme is to resolve the status of 2,750 persons in the system. When added to the existing 1,000 persons with status and 250 awaiting Ministerial Decisions Unit (MDU) letters, a total of 4,000 persons would be in a position to exit direct provision. This would free up resources to accelerate the processing and determination of applications so that the twelve-month target can be met. A secondary benefit would arise since space created in the accommodation system can further facilitate fundamental change.
17. Other measures to achieve a twelve-month processing target include enhanced access to early legal advice, extra resources to case processing bodies to reduce average decision times, enhanced IT systems to improve administration and eliminate bureaucratic delays and better communication with applicants regarding timeframes for interviews, decisions and case issues to reduce uncertainty and 'not knowing' where they are in the process.

Mechanism II: Distribution Key Based Model of Accommodation Provision

18. The current market-led procurement model of accommodation provision is unsustainable. The availability of accommodation has been the key driver in the location of new centres in rural communities over recent years, despite well-founded concerns regarding the suitability of these locations and their capacity to support residents. Any alternative model must instead be guided primarily by the suitability and capacity of the location to host protection applicants with dignity.

19. In addition, a longer term and holistic view of the needs of protection applicants and the integration needs of potential host communities should be taken to ensure appropriate resources and supports (in terms of accommodation, employment, health, education and welfare) are available.
20. A new model of dispersal derived from the EU Resettlement Programmes should be developed. This would be led by local authorities, based around an agreed distribution key and underpinned by designated hub locations with sufficient population, economic strength and support services. Smaller towns surrounding hubs could act as spokes taking smaller populations of protection applicants but linked to services centrally provided in hubs.
21. This approach would allow local authorities to manage community expectations and lead to a more equitable sharing of accommodation responsibility for applicants across the State.
22. State accommodation centres could act as a safety valve on the system at times of large and unanticipated demand. Essentially capacity could be built on State accommodation immediately to act as a backstop for the long term or to facilitate transition in the shorter term to the new local authority distribution model.
23. The new accommodation model would be underpinned by an independent living model enabling protection applicants to have autonomy and effective control over their lives. In line with National Standards it would envisage:
    a. Accommodation that ensures the privacy, dignity and safety of residents and prioritises own-door living.
    b. Adequate and appropriate private living space.
    c. Self-catering food preparation and dining facilities.
    d. Provision of appropriate non-food materials to promote health and wellbeing.
    e. Effective access to local recreational, educational, medical, health, social care and other public services.
    f. Supports to integrate and engage with the wider community.

Mechanism III: Holistic Person-Centred Range of Supports at All Stages in the Protection Process

On Arrival: Comprehensive Reception and Orientation Services

24. The international resettlement experience has demonstrated the benefits for protection applicants being welcomed and received in a communal setting for durations of up to three months after arrival. In Balseskin Reception centre, newly arrived applicants should receive:
    a. Orientation Services: A programme of enhanced reception and orientation supports which offer protection applicants a one-stop-shop information and referral service through dedicated clinics. This should also include facilitated access to a Personal Public Service Number (PPSN) and welfare services, support to complete social protection documentation and referrals to legal aid prior to dispersal.
    b. Medical Screening and Vulnerability Assessments: Applicants should be medically screened shortly after arrival in the State. The differentiated needs of applicants should be recognised through a consistent and comprehensive vulnerability assessment process, which will enable the State to identify and respond to the specialised needs of vulnerable applicants.
25. Large Inflows: Contingency plans should be in place for large unanticipated inflow of arrivals or if new applications significantly exceed reception capacity.

Awaiting Decision: Education, Employment and Financial Support

26. The right to work should be provided as early as possible to improve long-term integration outcomes for persons granted status. JRS Ireland advocate for access to the labour market after six months, or earlier, if possible, in line with international best practice and research. Practical barriers such as the prohibition on applications for driver licenses and access to bank accounts should also be removed.
27. Education is vital for the health and wellbeing of protection applicants. JRS Ireland would advocate allowing access to further education courses, at QQI Level 5 and 6, where there is available capacity on courses in line with the McMahon recommendation.
28. Finally, there needs to be adequate financial support to enable applicants live with dignity and to participate as fully as possible in their local communities. Families seeking asylum should be permitted to claim the Child Benefit payment.

Grant of Status: Transition and Integration Supports

29. The key challenges when exiting the international protection process are accommodation, welfare, education, employment and links to the community. The most pressing priority is finding suitable accommodation. Mainstreaming of transition supports from specialist agencies, as delivered by the Peter McVerry Trust and Depaul Ireland at present, will be important to enable successful protection applicants to move into the community in a timely manner.

Implementation Challenges and Considerations

30. *Significant Existing Accommodation Obligations:* There is a legal obligation under the Reception Directive to accommodate and to provide material supports to 7,700 people in the system residing in 85 locations throughout any system change. It would be easier to implement radical system change if there was a *tabula rasa*, which strengthens the case for a Long Stayer scheme as soon as practicable to create space for change.
31. *Housing Context*: There is an ongoing national housing crisis. In April 2020, there was 9,355 people homeless. Furthermore, in December 2019, there were a reported 69,000 households in Ireland that are qualified for social housing support but whose social housing need is not currently being met. The capacity to move to a new model is predicated on the availability of secure and affordable accommodation.
32. *Competition for Scarce Housing Resource*: The need for asylum seeker accommodation is demand led. A significant structural barrier to change is the lack of supply, which risks putting different qualifying groups, local and migrant, in competition for scarce housing resources. The draft programme for government has annual social housing build targets, but these will take time to come on stream, and it is uncertain if they will significantly meet growing demand.
33. *Impact of Legally Binding National Standards*: The National Standards will come into effect from the start of 2021. This requires the existing accommodation stock and any future procurement to be compliant with the Standards. The sanction for non-compliance should be determined by an independent and yet to be appointed monitoring body. This may result in further complications and place constraints on the transition process.
34. *Communication Strategy*: System change takes time. The commitments in the draft programme for government will understandably have raised expectations of imminent system change among asylum seekers. Communication around progress in the change process and implementation timelines needs to be clear and regular.
35. *Shorter Term Improvements*: Transition to a long-term approach will, by definition, take time. Thus, there will need to be interim measures put in place to improve case processing, living conditions and accommodation and asylum seeker supports in the short-term. For example, the immediate phasing out of emergency accommodation will require more suitable alternative accommodation to be secured in its place.

36. *Securing and Retaining Required Case Processing Resources*: The effectiveness of the proposed expedited Long Stayer scheme is that it is delivered quickly but not be at the expense of creating delays elsewhere in the process. The allocation, recruitment and retention of required case processing resources is vital.
37. *Local Authorities Housing Role*: A vital component of the new distribution key model advocated is the role of the local authority in implementation. This new housing responsibility for protection applicants will have to be balanced by local authorities with existing responsibilities for vulnerable households and social housing needs locally. Clear communication of housing priorities will be very important to avoid frustration between groups with competing housing needs.
38. *Accommodation Backstop*: If local authorities are unable to meet the housing need of protection applicants allocated to them under a distribution key, consideration must be given to where the responsibility for providing accommodation lies.
39. *Post Covid-19 Economic Cost*: It is unclear how quickly the economy might recover and how many businesses may never restart. The long-term economic implications of Covid-19 are unknown, but it is clear that there will be a significant negative budgetary impact for years to come, which may constrain system change and also create a more challenging political environment.
40. *Implementation Planning*: The process of system change will be delivered over the lifetime of the next Government. Learning the key lessons from the McMahon Working Group and National Standard processes, a detailed implementation plan needs to be agreed and necessary resources secured. The Government must appoint and clarify the role, responsibilities and membership of a body overseeing the implementation of system change.