



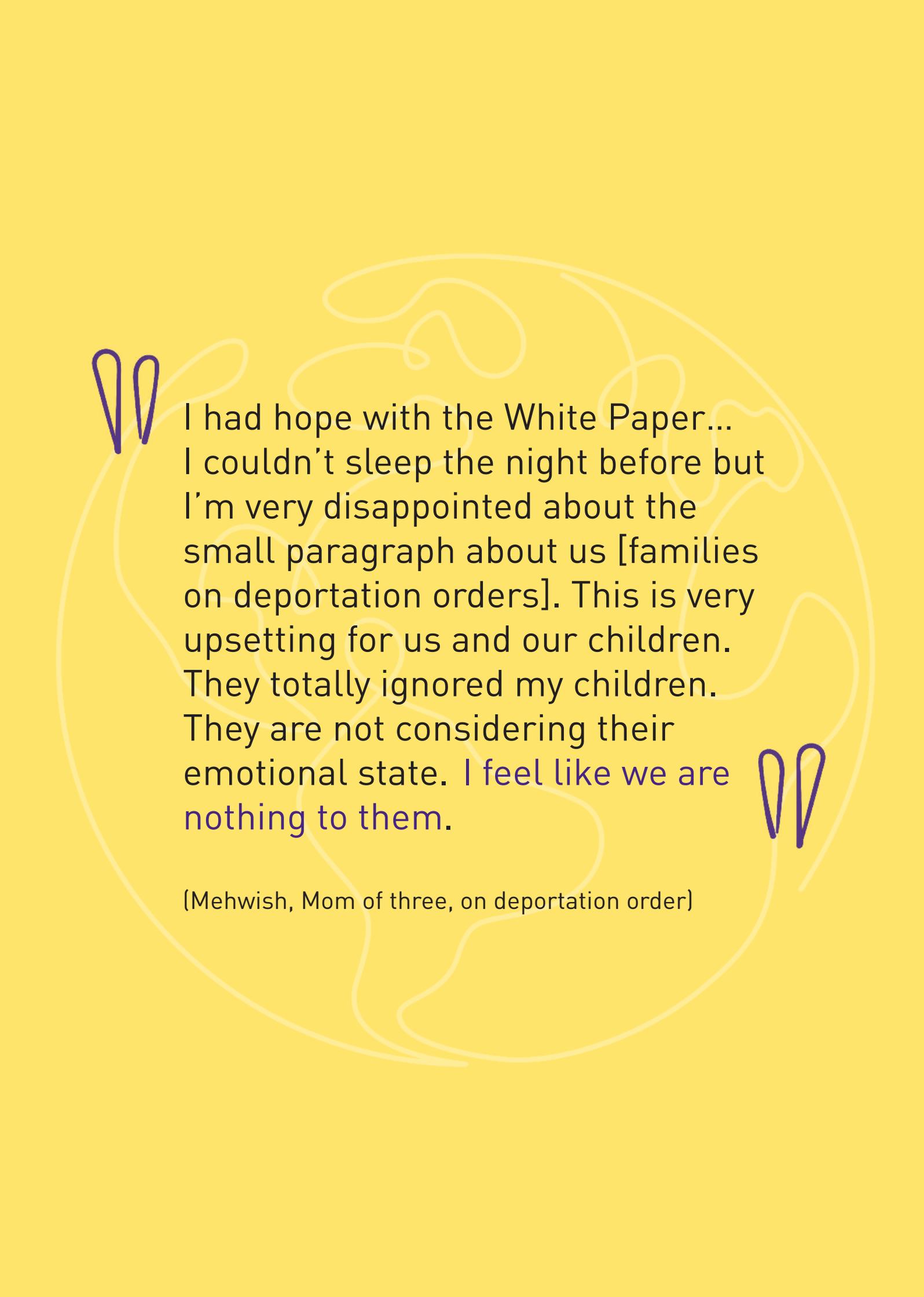
Prevention & Early  
Intervention Network

Promoting positive outcomes for children,  
families & communities



## PEIN Response to Government Plans for International Protection Reforms





I had hope with the White Paper... I couldn't sleep the night before but I'm very disappointed about the small paragraph about us [families on deportation orders]. This is very upsetting for us and our children. They totally ignored my children. They are not considering their emotional state. I feel like we are nothing to them.

(Mehwish, Mom of three, on deportation order)

# Summary

The Prevention and Early Intervention Network (PEIN) joins with our many colleagues in welcoming the Programme for Government commitment to end Direct Provision, the conclusion of the recent Advisory Committee that the current Direct Provision system is **'not fit for purpose'**, (Government of Ireland, 2020: 10), and the publication of a Government White Paper on ending Direct Provision. Further, we welcome the recent announcement of the independent Oversight Group established to monitor progress of the implementation of the White Paper.

The Prevention and Early Intervention Network (PEIN) is a membership organisation representing individuals and organisations working with children and families in Ireland who believe that policies and services need to enhance their commitment to proven prevention and early intervention approaches. This is particularly the case for services working with children and families facing adversity and disadvantage. PEIN particularly welcomes the focus on service provision by the state and not-for-profit sectors and the proposal that Children and Young People's Services Committees (CYPSCs) will provide a key planning and communication function. The introduction of well-being indicators is also a very positive development, as is the proposal to establish a fund for the community and voluntary sector to support those seeking International Protection (IP).

In addition to the Report of the Advisory Group on the Provision of Support, Including Accommodation, to Persons in the International Protection Process (Day, 2020), the Ombudsman for Children's Office (OCO) published a report earlier this year which concluded that Direct Provision (DP) **'does not have the best interests of children, or the protection and promotion of the human rights of child refugees at its core'** (Ombudsman for Children's Office, 2021: 5).

This report also notes many significant recommendations from a 2015 report by Dr Bryan McMahon which remain to be implemented, such as the establishment of an independent complaints process. Of particular interest to PEIN is the Ombudsman's statement that the **'HSE, Tusla and IPAS (International Protection and Accommodation Service) have failed to collaborate to provide on-site, preventative and early intervention services and to gather data on national trends of referral to services'**, (ibid: 6).

This too was a recommendation in the McMahon report. The Children's Rights Alliance statement to the Joint Committee on Justice and Equality (June 2019) also highlighted the need for a **'detailed strategy to focus on prevention and early intervention measures to support children and families living in Direct Provision incorporating the Signs of Safety approach and.....link with local and community services'**, (CRA, 2019).

# Key Principles

PEIN welcomes many of the principles which underpin planned Government reforms for IP.

These include:

- 1 The commitment to prioritise service provision from the state and not-for-profit rather than the commercial sector.
- 2 The emphasis on the provision of professional services and the range of staff training and development which will enable this.
- 3 Unaccompanied minors reaching 18 without a decision on their application will receive the same after-care support as Irish children.
- 4 The emphasis on using existing structures (CYPSC, SICAPs and LCDCs) rather than creating new ones which will support local integrated responses and the efficient use of resources.
- 5 The recognition that families seeking IP may have experienced trauma, have mental health issues and other complex needs. The allocation of case workers is a welcome development, and we anticipate that connections through the Child and Family Support Networks (CFSNs) where they are established, will be critical.
- 6 Reference to evidence-based services, improved data collection processes, monitoring of targets and utilisation of existing proven models (e.g., Slí), are all welcome principles.

Above all, PEIN welcomes the commitment to identify difficulties and intervene at the earliest opportunity to prevent the escalation of issues. The development, piloting and utilisation of vulnerability assessments, using evidence-informed tools, is an extremely welcome initiative, and PEIN acknowledges the work already undertaken in this regard. The development and monitoring of well-being indicators will, if effectively implemented, ensure that the wide-ranging needs of those in IP are addressed, so minimising long-term and potentially significant impacts on life choices, health outcomes and civil participation.

PEIN recommends the addition of a key principle that recognises the importance of, and commitment to, building on the evidence and best practice which already exists. This includes the mapping of effective models of service provision, thereby ensuring that current expertise is maximised.



# Implementation

Whilst PEIN recognises that some developments aimed at improving the experiences for those seeking IP have already begun, considerable work remains before a realistic implementation plan is achieved. In particular, we note the following:

- Resourcing the supports required to operationalise the aspirations of the White Paper will be a significant challenge. It is already recognised that there is inconsistency in availability of supports (both mainstream and specialist) for those arriving to Ireland through the Refugee Programme. Numbers are far larger for those applying for IP subsequent to arrival, yet many of these families will also have complex needs.

**'We did not know who to ask or where to go for help when we came here 6 years ago.... my children had so many problems because of leaving their home and their country. Nobody was able to tell us who could help them' (Rashad, Dad of four)**

Consistent funding for Community and Voluntary agencies that provide supports to those seeking IP is a requisite for both the ongoing co-ordination and provision of those supports.

- Proposed reforms rely to a large extent on the achievement of shorter timelines for processing IP applications. Given previous attempts to reduce these timelines, and the current back log in the system, the implementation plan needs to be realistic about numbers of applicants, the subsequent accommodation and support requirements, and the resultant resourcing needed.

**'For 6 years my daughter continuously sees her friends getting their papers and moving out. She asks me, 'why Mama, are we still here here? When will we go? People coming before and after us, they move' (Mehwish, Mom of three, on deportation order)**

- PEIN considers that, wherever possible, existing providers of supports to children, families and communities should act as hosts for local integration support programmes and case workers in order to maximise the opportunities for integration.

**'Integration from day one should include integration between the host society and asylum seekers to break down the barriers' (Precious, Mom of two, transitioned out of Direct Provision last year).**

- Costs are also based on 3,500 people in IP services, which does not take account of those already in the system, or the likelihood of annual increases in arrivals once the impact of the pandemic on international travel lessens. Whilst the report includes some costs relating to the implementation of the new proposed system, there are very significant aspects that remain uncoded. This includes
  - the provision of case workers;
  - delivery of a comprehensive range of staff training and development; additional mental health,
  - primary care and disabilities services;
  - specialist sexual,
  - gender and domestic violence services;
  - development of well-being indicators and establishment of an effective monitoring system; and
  - a dedicated internal and independent investigation team and processes.

● Schooling for children during the first four months in the IP process (Phase 1) will need to be carefully considered. PEIN absolutely supports children’s right to access education, and we recognise the importance of educational participation as a key aspect of effective integration. However, we also see the potential disruption for schools if they experience a regular flow of children in transition, and the potential impact this could have on the school environment.

● The role of the Local Government Management Agency in ensuring that IP accommodation is provided across the country in line with population needs and service provision should be based on strong data and will require careful monitoring. The demonstrable difficulties in ensuring that Local Authorities utilise allocated budgets for Traveller accommodation highlights the importance of a needs-based approach aligned to one where responsibility and accountability equally underpin decision-making.

● Whilst the commitment to early intervention is very welcome, there is a need for an urgent audit of current provision to ensure that children’s rights are being met, in terms of adequate play space, nutritious food, continuity of educational provision and so on.

● Systems are needed to avoid circumstances whereby families are required to move with little or no consultations and inadequate time to prepare for the inevitable changes and potential stress which will result from this move.

● Accessing urban-based, own-door housing amidst an ongoing housing crisis will prove problematic in some parts of the country. Fulfilling the commitment to moving those seeking IP into community settings after four months (i.e., Phase 2) without creating tensions in relation to perceived ‘**queue jumping**’ by others on housing waiting lists will be challenging. A twin-track approach by Government, where equity is seen to underpin accommodation developments for both those seeking IP, and Irish residents, will be vital.

● The lack of affordable accommodation has resulted in a housing crisis nationwide. One consequence of this is that families leaving Direct Provision (DP) are currently being re-located outside their county of residence. Families have built connections within the community, and importantly children are attending local schools. Families must be consulted regarding their housing needs and location and, where requested, arrangements should minimise any negative effects on child educational and wellbeing outcomes.

● Where possible, families must be re-housed within their county to mitigate the negative effects on child educational and wellbeing outcomes.

‘Last year we thought that we were finally leaving here [DP centre] and into our home but they wanted to move us to another centre in Kildare. My children are in their school here and I have some other mothers in the city that are like my family here so we did not want to leave..... The pandemic is what allowed us to stay here. This city is our home now’ (Nuria, Mom of three).

● Research has shown that adults and children exposed to conflict experience considerable psychosocial distress and worsening mental health (MH) outcomes. Living in DP has exacerbated existing MH conditions and the fact that vulnerability assessments have only recently commenced suggests that residents are not being systematically identified and/or given adequate psychological support. Furthermore, the impact of the pandemic

has led to a significant deterioration in living and wellbeing outcomes. The limited availability of services and social isolation has resulted in a worrying rise in MH difficulties, and increased suicide ideation, among residents (Doras, 2020).

**'People are not going to seek help for their mental health as sometimes they don't know where to go to' (Precious, Mom of two, transitioned out of direct provision last year).**

- Particular consideration needs to be given to the role of prevention and early intervention in the context of the needs of those seeking IP. While some individuals and families may not meet the threshold for intervention by statutory services, they may have other and/or cumulative needs that go undetected and therefore unmet.

**'My eldest boy is still wetting his bed and he is nearly 11 years old. This started when he came to Ireland and the school tells me 'he is ok, he is a very clever boy'. I want to tell them 'yes, this is true but he is a very worried and very scared boy also so can you please help him'. (Zara, mom of three).**

- Many of those seeking IP have distinct health needs for which there are limited supports and services. IP residents have typically experienced, trauma, violence, torture, abuse and loss of loved ones. Assessments need to take the broadest definition of Adverse Childhood Experiences (ACEs), and recognise that the threat of deportation itself constitutes an ACE. Barriers such as stigma, trust, language, different cultural mores and religious beliefs prevent many from accessing support (College of Psychiatrists of Ireland, 2017). Additionally, local MH services may not have the capacity or expertise to deal with these complex issues. Services that are culturally and linguistically appropriate are urgently required to address these needs and it is essential that the interventions are provided by properly qualified and trained mental health professionals.

**'All professionals working with children, especially schools, need to understand trauma and integration issues for children. To understand how difficult, it is to be shuttled from one place to another. They don't understand why some children act in a certain way because they don't understand what these children have been through. All schools should have support in place for refugee and asylum-seeking children but not just language support' (Precious, Mom of two)**

- DP is not conducive to child health and development. In 2019, there were 1,647 children in the Direct Provision system. The poor physical environment, isolation and social exclusion of children in DP impacts a child's overall wellbeing (Arnold, 2012). In order to support enhanced child health and development, there is a need for greater awareness raising amongst parents around the indicators of healthy development, the importance of early intervention, services available and access routes to those services. Additional supports may be necessary in Phase 2 to promote child development and improve their socialisation/interaction with peers, including free access to recreational activities.

**'My children do not go outside enough. I want them to play in the sunshine and have friends and fun but they don't do this. Sometimes they are like ghosts and as their mother, this makes me very, very sad' (Nuria, Mom of three)**

- The provision of English language supports is crucial to the MH and integration needs of IP applicants. Whilst the provision of intensive language support during Phase 1 is proposed, the duration/intensive nature of such support is not indicated. A recent review by SOLAS and ETBI (2018) questioned the effectiveness of short courses of less than 200 hours duration and recommends longer tuition times to achieve progress in language competency. Poor language acquisition represents an onerous barrier in accessing health/social welfare services, employment and general integration into the

community. Importantly, older adults, women with children, and those with poor literacy are less likely to engage with language supports. Moreover, language provision has also been severely disrupted due to the restrictions associated with Covid19.

**'We had some English language classes for maybe the first 4 weeks when we came here. The lady was very nice but she French and it was very difficult to understand her English. I wish she was Irish so that we could learn how to understand the Irish accent that is all around us' (Rashad, Dad of four)**

- The availability of parenting programmes to residents is widely welcomed. This should be an integral part of the provision of culturally sensitive information during an orientation process (such as that provided in New Communities Partnership workshops), providing parents with relevant skills to promote the development of their children and information about parenting practices in Ireland.



# The Role of the Prevention and Early Intervention Network

PEIN member organisations and individuals are located across the country, in community-based services, statutory organisations, residential and educational settings and across the breadth of sectors working with children and families. Many already have significant experience in working with children and families living in Direct Provision Centres and seeking International Protection. Our members have a range of skills, expertise, evidence-informed practices and well-established networks which can offer important supports to families when they arrive in Ireland, and as they seek to establish themselves within community settings. Embedding Intercultural and Resettlement Workers within our membership networks would maximise these connections and expertise.

In addition, PEIN is well positioned to undertake a best practice review on supporting the integration of international children and families into communities, drawing on:

- PEIN Member's experience;
- Consultation with those who are in, or have been in, IP: and
- Irish and international experience.

This best practice review would inform the development of an integration model including:

- Mapping current models of service provision
- Preparation of international children and families for integration to Irish communities
- Preparation of local communities to accept international children and families
- Delivery of training / awareness programmes in multi-ethnicity and anti-racism
- Building of relationships and phased integration
- Delivery of training on trauma informed practice.

## On entering DP



My family was very happy to come to Ireland and to start a new life where we can be free and happy, and live just like our Irish friends. We were very thankful to come here.....and to have a place to start from [the Centre]. We were excited! But then we came here and we understand that this is a prison, this is not a home.....Your children must eat this and they must stay in their room. Not just for a few weeks but this has been years. My children have been in prison for years, do you understand? One of them was even born in this prison. They are not free like your children. If I knew this before, I would have stayed in our country where it is not safe. Maybe that would have been better for my children



(Khish, Dad of five)

## On living in DP



This is not living. This is being in a waiting room and they have forgotten we are here so we will never be called



(Rashad, Dad of four)

## On transitioning from DP

 There is nothing in direct provision that prepares you for life outside. They just throw you in the deep end. Sometimes people are afraid of what waits for them on the other side, so they don't want to leave. What is really needed is formal supports. If am leaving direct provision, I should be able to go to this person or this place to get advice, information, etc. The system creates learned helplessness. They're finding schools for my kids, they're bringing my kids to school, they're giving me food, etc. So, when I get status, I don't know how to do anything for myself

(Precious, Mom of two)



## On leaving DP



When we left that place two years ago, I promised that I would never go back there. But I do. I have neighbours now who are kind and care about my family and the other families still living in Direct Provision. They collect clothes and nappies and books... and together we bring them out to the Centre to all my friends who must stay there. I am so happy for myself to be free but I am so sad for them

(Amira, Mom of three)



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...I feel like we are NOTHING...



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