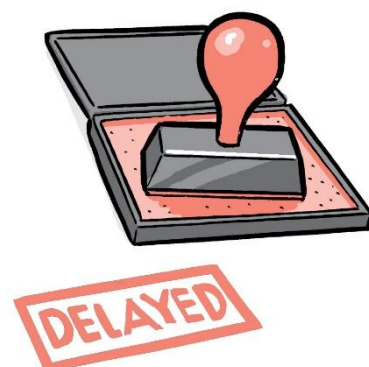




Migrations in Our Common Home

Inside the System: A Review of Ireland's International Protection Application Process



Roundtable on Migrations in Our Common Home

Migrations in Our Common Home

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Executive Summary

Ireland's international protection system is at a critical juncture. Every year, thousands of people arrive seeking safety, protection, and a chance to rebuild their lives. From the moment they declare their intent to seek asylum, they find themselves navigating a process that is both complex and critical. The *General Scheme of the International Protection Bill 2025* and the *National Implementation Plan (NIP)*, shaped by the EU Pact on Migration and Asylum, promise a faster, more efficient system. However, unless implemented with strong safeguards, these reforms risk hardening the very barriers they aim to dismantle.

This paper maps the full process from arrival to post-decision and identifies systemic weaknesses that have the potential to undermine fairness, safeguards, and rights compliance.

The key challenges identified include:

- *Procedural fairness and legal safeguards:* Gaps in early and continuous legal guidance/assistance, inconsistent interpretation services, and uncertain timelines undermine applicants' ability to understand and exercise their rights.
- *Data privacy, digitalisation and fairness:* While digital reforms and expanded biometric data aim to improve efficiency, gaps in accessibility, consent, and oversight risk digitally excluding vulnerable applicants and compromising data protection.
- *Reception conditions and accommodation:* The new tiered reception model under the National Implementation Plan (NIP) links accommodation to procedural categories and makes available accommodation conditional on request, creating unequal access to housing, services, and dignity. Overcrowding, poor hygiene, and movement restrictions further threaten dignity and wellbeing.
- *Administrative delays, bureaucratic backlogs and quality:* Persistent backlogs in the International Protection Office (IPO) and International Protection Appeals Tribunal (IPAT), combined with inadequate staffing, and limited specialist training, lead to lengthy waiting periods and inconsistent outcomes. Reliance on digital tools without sufficient human resources risks prioritising speed over quality and fairness.
- *Vulnerability assessments and trauma-informed care:* Inconsistent application of vulnerability screening, limited access to mental health supports, and lack of gender-, child-, and family-sensitive safeguards compromise protection for those most at risk.
- *Integration and transition post-status:* Delays in accessing housing, education, and employment, combined with weak post-recognition supports, hinder status holders' ability to rebuild their lives and fully participate in Irish society.

Policy recommendations

- *Ensure access to legal support at all stages*
Legal guidance/assistance must be available from the earliest stages, beginning with the initial declaration of intent, through the preliminary interview, questionnaire submission, and all appeals. Without access to qualified legal representation, applicants cannot meaningfully engage with a



complex and high-stakes system. This is also a requirement under the Asylum Procedures Regulation. Where applicants are detained, they must be provided with legal guidance/assistance so that they are aware of the reasons for detention and that they understand their rights.

- *Professionalise frontline support through mandatory training and accreditation*
All frontline staff including interpreters, caseworkers, immigration officers, and reception centre personnel should receive mandatory, accredited training in trauma-informed care, vulnerability sensitivity, cultural competence, and gender-responsive practices. These competencies are essential in the international protection context, where many applicants are survivors of violence, persecution, or trafficking. Accreditation and certification should be standardised across departments to ensure quality and accountability. Staff must also be trained to recognise and mitigate personal or cultural bias, as poor-quality interpretation or discriminatory attitudes can seriously compromise applicants' rights. Such training must be embedded in induction and professional development across the protection system to ensure consistent, respectful, and appropriate treatment.
- *Create transparent, accessible case management systems*
Applicants should be able to track their applications, understand what is expected of them, and receive regular case updates. While a centralised digital system is welcome, it must be accompanied by safeguards to prevent digital exclusion, especially for those with limited literacy (including digital literacy), or no access to devices or stable internet. In-person support should be available to assist with completing digital application forms for those who need it, especially for vulnerable individuals. The case management system should also extend beyond the IPO stage to include appeals, ensuring continuous access to information and updates throughout the protection process.
- *Guarantee safe, dignified, and appropriate reception conditions*
Direct Provision centres are often of poor standard, lack privacy, are overcrowded, and provide insufficient nutrition and hygiene, all of which violate basic dignity and wellbeing. Although the government has committed to ending Direct Provision, the NIP now introduces a tiered accommodation system linked to an applicant's procedural category. Under this system, accommodation is provided only when applicants explicitly request it, rather than being granted automatically. This approach risks repeating many of the same shortcomings under a different framework. Reception accommodation should be offered automatically to all applicants, without requiring an explicit request. Making access conditional risks excluding individuals who may face language barriers or lack access to information. Reception support must also be based on individual need, not procedural category, to ensure fair and equitable treatment. This includes providing adequate, appropriate accommodation and services, particularly for vulnerable individuals, to prevent applicants from being left without shelter or essential support. Screening centres and reception conditions should not impose disproportionate movement restrictions or operate as de facto detention.
- *Ensure equitable access to the labour market*
Labour market permissions should be renewed promptly to prevent employment disruption and income insecurity. To ensure stability and continuity, applicants should also retain the right to work during the appeals stage to avoid prolonged dependency on the state, loss of skills, and social isolation.



Exclusion of those in accelerated or border procedures denies equal opportunity and risks deepening marginalisation. Measures should also support parents through accessible childcare. Finally, proposed movement restrictions should not impede applicants' ability to access or sustain employment.

- *Ensure fair and accessible appeals procedures*

The appeals process must uphold procedural fairness and allow applicants a genuine opportunity to present their case. Applicants should be clearly informed of their rights and the steps available to them following a negative decision. The shortened five-day appeal window places applicants under significant pressure. This timeframe should be extended to at least 10 working days, beginning from the date the applicant actually receives notification of the decision, to ensure adequate time to understand the outcome, obtain translation and legal guidance/assistance, and prepare an appeal.

Applicants should also retain the right to an oral hearing where issues of credibility, factual accuracy, or trauma-related evidence arise. Written-only appeals limit their ability to clarify misunderstandings or correct errors. Legal guidance/assistance and translation services must be guaranteed and accessible at all stages of the appeal process to ensure that decisions are based on the merits of the case rather than procedural barriers.

- *Promote interdepartmental coordination and policy coherence*

Responsibility for protection and integration is currently fragmented across departments. A coherent, cross-governmental approach is essential to ensure continuity of support from international protection application to post-status life. The Department of Justice, Home Affairs and Migration must be empowered to coordinate with housing, health, social protection, and education bodies, particularly at the point of transition to the status of 'leave to remain'. Coordination mechanisms should also include civil society and non-governmental organisations that provide frontline support to applicants and facilitate inclusion.

- *Strengthen post-status integration supports*

The current system too often frames integration as a secondary concern or discretionary support. In practice, delays, isolation, and lack of access to essential services undermine inclusion and perpetuate marginalisation. Integration must be repositioned as an issue of social justice, and a structured pathway must be developed to support those granted status in transitioning out of IPAS accommodation and into independent living. Integration planning should prioritise access to housing, employment, education, and mental health supports to promote long-term social cohesion and inclusion.

As the process to pass the *General Scheme of International Protection Bill 2025* into an act has now begun, Ireland faces a choice. It can meet the EU Pact's deadlines by simply compressing the process or it can build a system that is fast, fair, and anchored in dignity. With political will, cross-departmental coordination, and sustained investment, Ireland can develop a humane, efficient, and rights-based process that meets legal obligations while strengthening social cohesion and public trust.



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Introduction

“She has been staying in a hotel on the edge of the city as she waits for an interview with the International Protection Office, after which she will be issued with the blue temporary residence card (TRC) that gives asylum seekers access to public services.

This is just the first step in being recognised as an asylum seeker in Ireland.

In the past, getting an appointment and a card usually occurred within days of arriving in the country. Shouha has been waiting more than three months.

When Shouha does receive her TRC, she will be able to apply for a PPS number and will probably be sent to a formal reception centre, before being sent to a direct provision centre, where she will get a €38.80 weekly payment and enter the more usual limbo where asylum seekers exist in Ireland.

Right now, in the emergency centre where she has a room, she receives meals but no access to money or clothes, and little information apart from what she gets from advocates”

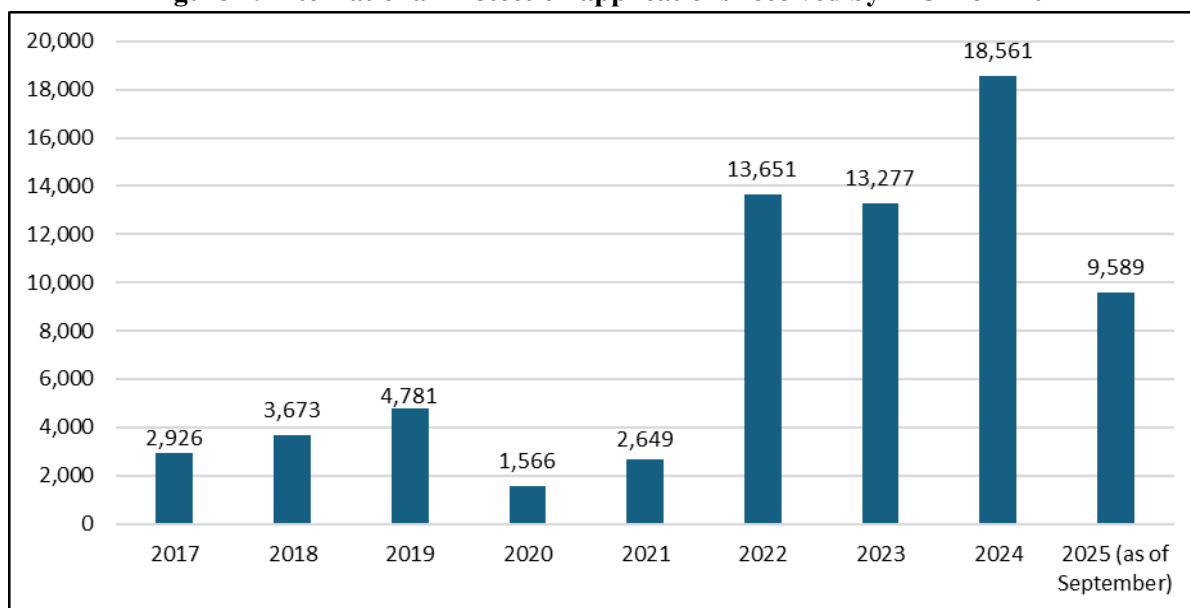
(Freyne, 2022)

This is the story of an applicant seeking international protection in Ireland named Shouha, as reported in *The Irish Times* on 9th April 2022. This story reflects the structural experiences of many people seeking international protection in Ireland, a situation that continues to resonate widely. It depicts a process marked by long delays, fragmented support, and increasing public scrutiny. While Ireland has clear legal obligations under international, European, and domestic law to protect those fleeing persecution, war, and serious harm, the implementation of these responsibilities has been uneven, particularly in the face of political pressure, resource constraints, and administrative backlogs.

Since the establishment of the International Protection Office (IPO) in 2017 under the International Protection Act 2015, there has been steady growth in the number of international protection applications. However, a significant surge occurred in 2022, when 13,651 applications were lodged, an increase of 186 per cent compared to 2019, the last pre-pandemic reference year (**Figure 1**). Application levels have remained high since then. In 2024, more than 18,500 applications were lodged, a 40 per cent increase on 2023. While there is a projected decline in applications compared with last year, with only 9,500 as of September, nonetheless, this remains significantly higher than pre-2022. This continuing high number requires adequate resourcing



Figure 1: International Protection applications received by IPO from 2017



Source: *International Protection Office Statistics*

A report published by the Economic and Social Research Institute (ESRI) attributes this rise to multiple intersecting factors, including post-COVID after-effects and suppressed migration, deteriorating conditions in countries of origin, UK policy changes, secondary movements within the EU, and perceptions of Ireland as a viable destination (Cunniffe, et al., 2022). This surge has intensified existing pressures on the system, particularly around staffing and capacity. A 2021 review by the Department of Justice had already identified a significant staffing gap at the IPO, with a 37.9 per cent shortfall in full-time equivalent positions relative to approved levels (Department of Justice, 2021). The increase in applications only magnified this strain, exposing the system's limited capacity to manage a growing caseload efficiently.

Despite recent investments¹ and a 158 percent increase in staffing levels by October 2024² (in comparison to 2022), processing delays persist. In 2024, the median IPO first-instance processing time for the accelerated procedure was 3 months, while for the normal procedure it had reached 18 months, with some applicants waiting over 72 months (6 years) for their first-instance decision (Minister for Justice, 2025). Appeals submitted to the International Protection Appeals Tribunal (IPAT) also continued to face similarly lengthy processing time, with some applicants waiting over 69 months (Minister for Justice, 2025).

Although international protection applicants make up a very small fraction of those migrating to Ireland, they have become disproportionately central to political and public debate. According to the Central Statistics Office (CSO), over 149,200 people migrated to Ireland between April 2023 and April 2024 (including 30,000 returning Irish citizens) with the majority arriving for employment, education, or family reasons (CSO, 2024). In contrast, 18,561 people applied for international protection during the same period (International Protection Office, 2025). Yet the scale of protection-based migration is

¹ <https://www.gov.ie/en/department-of-justice-home-affairs-and-migration/press-releases/minister-mcentee-updates-government-on-increased-resourcing-for-international-protection-system/>

² <https://www.oireachtas.ie/en/debates/question/2024-10-08/355/?highlight%5B0%5D=staffing&highlight%5B1%5D=international&highlight%5B2%5D=protection&highlight%5B3%5D=office&highlight%5B4%5D=international&highlight%5B5%5D=protection>

routinely distorted in public discourse, framed in terms of “influx” and “system overload”. This distortion risks undermining rational policymaking and fuels harmful narratives. It suggests restricting the right to apply for asylum could resolve broader challenges such as the housing crisis or overstretched public services, when in reality, cuts or restrictions targeting this group will not meaningfully address these challenges.

This briefing paper comes at a critical moment. It reviews the international protection process through a human-rights lens and adopts a pragmatic, solutions-oriented approach to a system that remains under-resourced. In doing so, it highlights urgent need for strategic management, adequate resourcing, and informed public discourse to ensure that Ireland fulfils its legal and moral responsibilities while maintaining public confidence in the integrity and sustainability of the international protection process. It integrates detailed insights from Ireland’s 2025 *National Implementation Plan for the EU Migration and Asylum Pact*, analysing how its proposed reforms such as infrastructure investment and new end-to-end digital systems may enhance or hinder rights-based practice in Ireland’s protection framework.

Context

This is the fourth policy briefing produced by the Roundtable on Migration in Our Common Home, a collective of organisations and individuals concerned about the shape of migration policy in Ireland and internationally.

The first policy briefing, *Migrations in Our Common Home: Responding with Care – Ireland’s response to the Ukrainian crisis*,³ considered how the response to Ukrainian migrants following the implementation of the Temporary Protection Directive, albeit with reservations, might become a blueprint for a human-rights-based approach to migration policy. Our second policy briefing, titled *Planning for Change: Climate Change and Migration*,⁴ presented the Roundtable’s response to discussions during COP27 as it drew to a close. It proposed that, in order to manage migration, we would have to look beyond domestic policy, while acknowledging that migration is and has always been a fact of life, and take steps to alleviate harmful and unwanted drivers of migration and displacement. It specifically highlighted the need for greater clarity in respect of the interaction between Overseas Development Assistance, Climate Finance and Loss and Damage. The third policy briefing, *Migrations in Our Common Home: Forecasting for Change*,⁵ looked at the recent trends in immigration to Ireland and explored how we might use forecasting to better plan for future inflows of migrants and ensure we take a human rights based approach, ensuring that all people have access to appropriate accommodation; decent services and infrastructure; the right to participate in society and to maintain an adequate income; and the right to safety and security.

This fourth briefing is shaped by significant developments at both national and the EU level. On 10th April 2024, the European Parliament adopted the *EU Migration and Asylum Pact*,⁶ which introduces far-reaching changes to how Member States manage international protection claims, particularly in relation to border procedures, admissibility rules, appeals, detention, and reception standards. Following a vote in both the Houses of the Oireachtas, Ireland opted into the Pact on 27th June 2024. The country now has until 12th June 2026 to implement these regulations.⁷ In response, the Minister for Justice

³ <https://www.socialjustice.ie/publication/migrations-our-common-home-responding-care-irelands-response-ukrainian-crisis>

⁴ <https://www.socialjustice.ie/publication/planning-change-climate-change-and-migration>

⁵ <https://www.socialjustice.ie/publication/migrations-our-common-home-forecasting-change>

⁶ <https://www.europarl.europa.eu/news/en/press-room/20240408IPR20290/meps-approve-the-new-migration-and-asylum-pact-and-Pact-on-Migration-and-Asylum-European-Commission>

⁷ https://ireland.representation.ec.europa.eu/news-and-events/news/what-eu-pact-migration-and-asylum-2024-11-20_en

secured Cabinet approval to progress legislation on the *General Scheme of the International Protection Bill 2025*, which will replace the *International Protection Act 2015*.⁸ The Department of Justice, Home Affairs and Migration also published the *National Implementation Plan* (NIP) in May 2025, setting out a wide-ranging reform strategy in line with the *European Commission's Common Implementation Plan*.⁹ The key commitments include €875 million in capital investment for reception centres accommodating up to 14,000 individuals, with an indicative €725 million in annual operating costs; at least €117 million annually for international protection system staffing; deployment of an end-to-end digital case management system; legislative reforms limiting oral appeals; and the expansion of movement restrictions for those residing in reception facilities.

While some of these measures directly address long-standing capacity gaps, others raise legal and ethical concerns, particularly where they risk reducing procedural safeguards or undermining human dignity. These concerns will be examined at each stage of the process, including the introduction of movement restrictions for those in reception centres (which may amount to de facto detention), and the replacement of oral hearings with file-based decisions at appeal level.

As such, Ireland's own international protection system must be scrutinised not only for how it operates now, but how it may evolve under the combined influence of domestic policy shifts and EU harmonisation pressures. International protection is not simply a technical procedure; it is a system that must uphold core legal and ethical standards. The commitments made in the National Implementation Plan (NIP) signal both opportunity and risk. It is therefore essential that these reforms not only comply with European directives but actively uphold Ireland's responsibilities under the *EU Charter of Fundamental Rights*,¹⁰ the *1951 Refugee Convention*,¹¹ and the *EU Directive on Reception Conditions (recast)*.¹²

In this, our fourth policy briefing, we examine the international protection application process in Ireland, with a view to assessing whether it reflects a rights-based approach, as required under Irish, European, and international law. This briefing draws on the insights from two roundtable consultations. Participants include civil society organisations, academic experts, and frontline practitioners working directly with individuals navigating the international protection process. The paper offers a step-by-step policy analysis of how international protection works in practice. At each stage, from initial contact to final decision, it identifies key structural concerns and provides practical, evidence-based policy recommendations aimed at ensuring fairness, transparency, and accountability. This paper proceeds from the premise that human rights are not optional, they are fundamental to the credibility and legitimacy of the international protection system. A fair and efficient process is not only a moral imperative, but also a legal obligation.

⁸ <https://www.gov.ie/en/department-of-justice-home-affairs-and-migration/press-releases/minister-jim-oconnor-secures-cabinet-approval-for-publication-of-the-general-scheme-of-the-international-protection-bill-2025/>

⁹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2024%3A251%3AFIN>

¹⁰ <https://fra.europa.eu/en/eu-charter/article/18-right-asylum#:~:text=Article%2014-1.,principles%20of%20the%20United%20Nations>.

¹¹ <https://www.unhcr.org/about-unhcr/overview/1951-refugee-convention>

¹² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32013L0033>

Journey through International Protection

Application Process in Ireland

This section provides a comprehensive overview of the international protection process in Ireland, from first contact to final decision. A high-level overview of the current official process is presented in **Figure 2**, while **Figure 3** outlines how the process is expected to change under the proposed reforms. The analysis draws on legal frameworks, procedural documents, and roundtable consultations to assess each stage of the process.

In Ireland, any person who is 18 years of age or older and who is at the frontier of the State or who is in the State can make an application for international protection: (a) on his or her own behalf and/or (b) on behalf of another person who is under 18 and in their care. The process is designed to assess whether a person qualifies as a refugee, a recipient of subsidiary protection, or is entitled to permission to remain under humanitarian grounds.

While the *International Protection Act 2015* provides a statutory foundation for this process, and Ireland is also bound by other international obligations, there remains a substantial gap between the formal procedures and the lived experiences of applicants. With the recent approval to advance legislation on the *General Scheme of the International Protection Bill 2025*, which will replace the current Act, this section also considers how proposed reforms, and the NIP may affect each stage of the process.

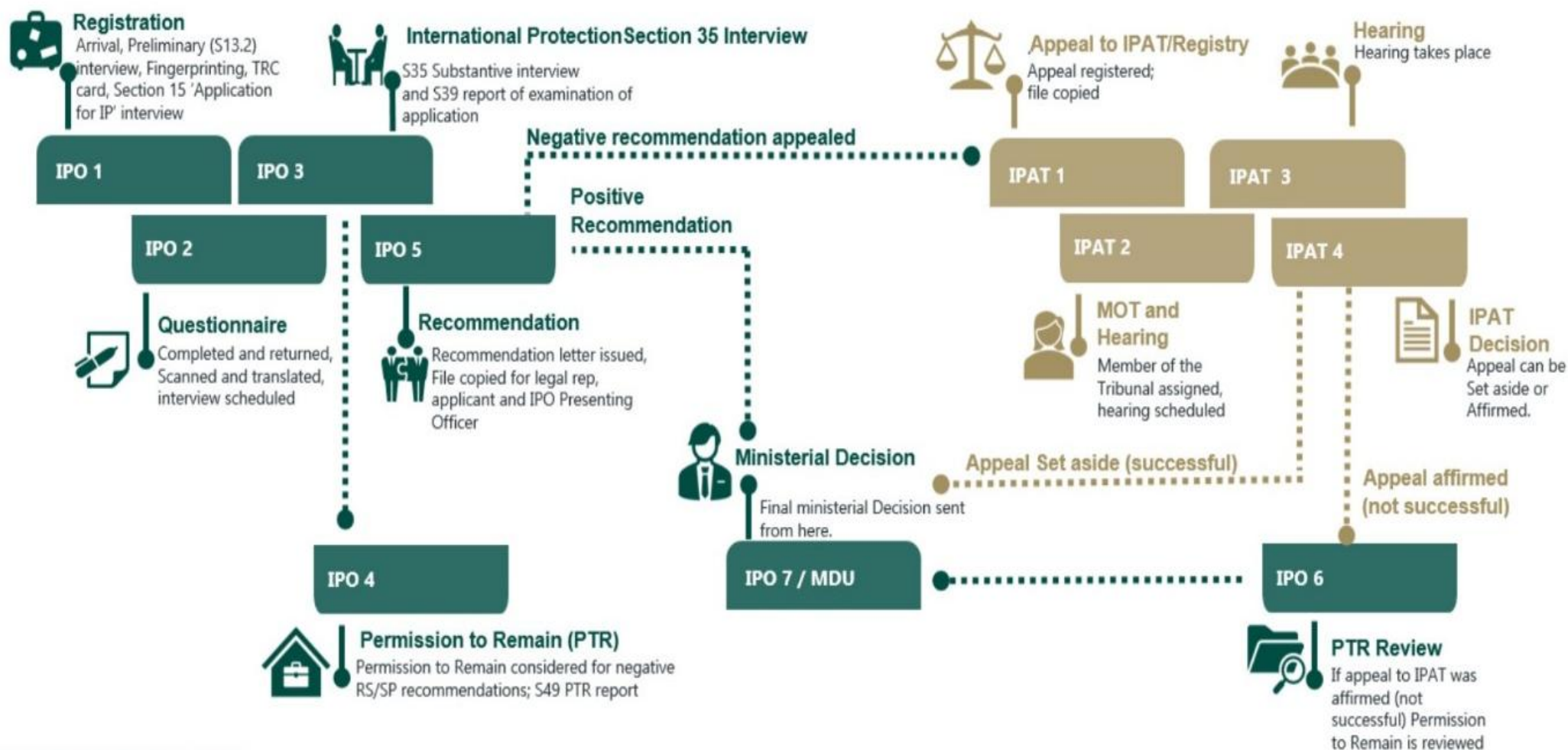
It is important to note that the stages described here are not exact replication of the statutory application process; rather, they reflect the typical sequence of events and touchpoints that an applicant may encounter throughout their time in the system, from arrival to final outcome (first-instance decisions only). This mapping draws on the official applicant information booklet as a reference point, but goes further to capture the broader experience, examining how these stages function in practice. The analysis is informed by extensive insight from civil society organisations, academic experts, and individuals working directly with applicants. This diverse group brings both practical and analytical perspectives, combining day-to-day engagement with the system and broader structural understanding. Their first-hand experience and professional expertise complement the legal and procedural framework, grounding the paper not only in policy and law but also in lived reality.

To inform this paper, we adopted a participatory and consultative approach by engaging with civil society representatives who work with individuals in the international protection system. Two roundtable consultations were convened as part of this process. The first consultation served as a scoping discussion to establish context and surface initial concerns. This was followed by a questionnaire circulated to all members, which enabled them to provide more detailed and reflective input based on their specific areas of work. A second consultation was then held to review the responses and discuss emerging themes in depth.

This iterative, practice-informed approach has shaped the analysis presented in this paper. It allows us to bridge the gap between formal structures and real-world experience highlighting where the system breaks down, how it affects those within it, and what is needed to improve both its fairness and functionality.



Figure 2: High level overview of International Protection Application Process



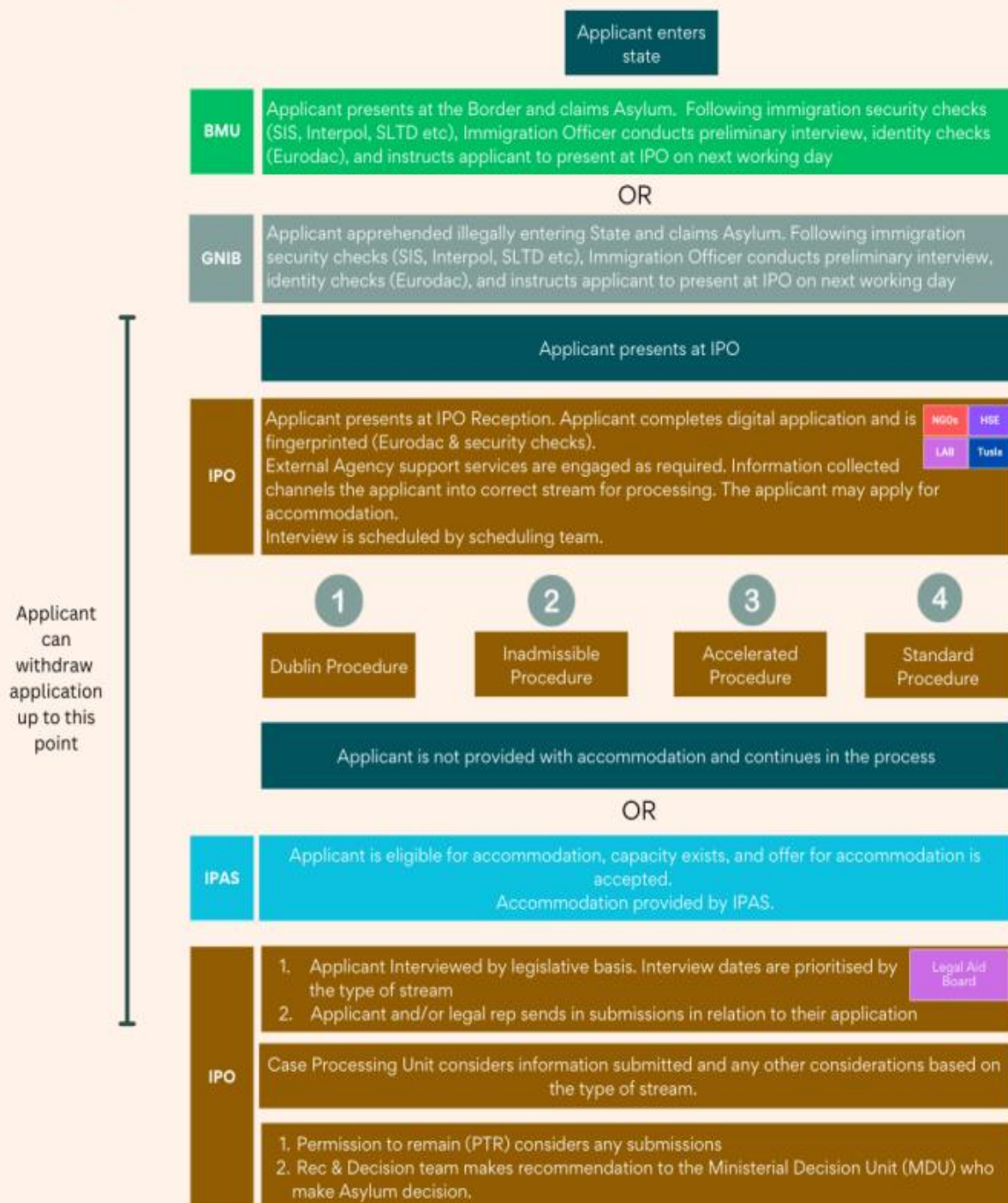
Note on End to End process:

- Not all applicants will follow all steps in this process
- Some applicants will follow the Dublin procedure/inadmissible procedure, subsequent application procedure, withdrawal procedure, non-cooperation procedure

Source: *An End-to-End Review of the International Protection Process*, p.17

Figure 3: High level overview of the new International Protection Application Process

International Protection High Level overview of process (Asylum Claim - Interview)



Source: *National Implementation Plan | Ireland: Implementation of the Pact on Migration and Asylum, p. 20*

Stage 1: Express intent to apply

Under the current system, the first step for an individual seeking international protection in Ireland is to express their intent to apply, either at the point of entry (airport or ferry port) or after entry to the State at the International Protection Office (IPO) in Dublin. The IPO processes are split in two - families with children under 18 should attend the IPO office at the Citywest Convention Centre in Dublin 24, while all other applicants are required to visit the IPO office on Lower Mount Street.

At this point, the IPO formally records the applicant's declaration and initiates the registration of their claim. However, numerous concerns were raised by the roundtable members about the challenges embedded in this initial phase. Many highlighted how the process is procedurally dense, fast-moving, and paperwork-heavy, increasing the risk of administrative errors, especially when applicants are stressed, unassisted, or unfamiliar with terminology.

General Scheme of the International Protection Bill 2025 and National Implementation Plan

Under the forthcoming *General Scheme of the International Protection Bill 2025* and Ireland's *National Implementation Plan* (NIP), this stage will be reshaped by new procedures. A mandatory screening procedure, including identity verification, health, vulnerability and security checks, will become standard under the EU Screening Regulation. Importantly, there is no legal entitlement to advice or representation during this phase. The NIP also reveals that substantive procedural actions would begin even before IPO registration. While it is mentioned that the individual will receive "legal counselling (orientation)", The Bar of Ireland (2025) has raised concerns regarding a lack of defined roles, responsibilities and minimum qualifications for both legal counsellors and cultural mediators. This is particularly concerning given their proposed early involvement under the General Scheme.

Individuals presenting at the Border Management Unit (BMU) or apprehended by Garda National Immigration Bureau (GNIB) will undergo security checks (e.g., SIS, Interpol, SLTD) and initial EURODAC registration. These "pre-registration" screenings are to be completed in screening centres¹³ within seven days and carry significant weight but lack formal safeguards or legal assistance. These effectively act as a "Stage 0" in the international protection process, complicating procedural clarity and accountability.

The Asylum Procedure Regulation (including the Return Border Procedure Regulation) further stipulates that all applicants are subject to the border procedure to determine whether applications are unfounded or inadmissible. It introduces a mandatory asylum border procedure within all Member States, with a maximum duration of 12 weeks when:

- the applicant intentionally misled the authorities or intentionally destroyed or disposed of an identity or travel document;
- the applicant is a danger to the national security or public order; or
- the applicant is of a nationality of a third country for which the proportion of decisions granting international protection is 20 per cent or lower.

In practice, many applicants may be unable to present valid passports or travel documents at the border. The Irish Refugee Council¹⁴ observes that refugees often cannot obtain official documents from

¹³ Under the new pact, screening centres will function as the first point of contact for all individuals applying for international protection. These centres will conduct identity, health, and security screening, registration, preliminary interviews to determine admissibility, and biometric data collection—all within the same facility. During this period, applicants are treated as if they have not yet formally entered the State.

¹⁴ <https://www.irishrefugeecouncil.ie/get-the-facts-irish-context>

authorities they are fleeing, while others may have lost them in transit or had them confiscated by smugglers.

Moreover, despite being physically present at the border or within the State, applicants are considered, in legal terms, not to have entered the State. This status has significant implications for their rights and access to procedures, as it limits legal safeguards and reinforces the perception of international protection applicants as being outside the protection of the State's legal system (Jesuit Refugee Service, 2024).

This legal construct creates what one roundtable member called a “legal fiction” of non-entry:

“The legislation basically pretends that the applicant is not within state borders/territory so it’s a legal fiction. The rules around detention still apply.... It seems this legislation makes it easier to detain people – the real issue for states is the capacity of the detention centres.”

Roundtable Member

These procedural changes fundamentally alter the character of this stage. What was previously a simple declaration of intent is now a deeply consequential step involving screening and detention, and this is without legal clarity or guaranteed representation. Unless safeguards are implemented in parallel, the proposed reforms risk undermining applicants’ rights at the very outset of their protection journey.

Concerns raised at this stage:

- The application process begins with minimal orientation or information, which leaves many applicants confused about their rights and next steps. This lack of early legal guidance/assistance increases their vulnerability and can cause confusion and anxiety at a moment when they are least prepared to advocate for themselves.
- Applicants located outside Dublin must often travel significant distances at personal expense to attend IPO appointments. For individuals with limited financial means, health constraints, or who are caring for small children, this requirement poses a significant barrier to accessing the system.
- Increased enforcement under the Immigration Act 2004, including spot checks and arrests for documentation issues, creates a climate of fear and criminalisation that discourages vulnerable individuals from engaging with the process.
- The early stage is fast-paced and administratively intense, often conducted without proper interpretation or legal guidance/assistance. Mistakes in recording names, dates, or details may persist throughout the case, undermining the credibility of the applicant or delaying access to services.

Concerns arising from the *General Scheme of the International Protection Bill 2025* and NIP:

- Mandatory screening covering identity, health, and security, with no guaranteed legal entitlement, will become the standard despite its procedural weight. This significantly limits applicants' ability to understand their rights, navigate documentation demands, or challenge procedural errors at a stage that can define the trajectory of their claim.

- The “legal fiction” of non-entry remains in effect during the border procedure. Although physically present in the State, the applicants are treated in law as if they have not yet entered. This legal status limits their access to rights and protections, including legal safeguards and other broader procedural guarantees.
- Applicants processed under border procedures can be held in designated centres for up to 12 weeks. While these facilities are not officially classified as detention centres, the absence of clear legal safeguards around movement restrictions creates a risk of de facto detention, with constrained access to support networks, civil society, and legal assistance. These restrictions risk undermining applicants’ autonomy and creating conditions akin to detention without formal classification as such.

Stage 2: The Preliminary Interview and Screening

In the current system, shortly after registering their intent to seek international protection, applicants are scheduled for a preliminary interview conducted by the IPO. Here, applicants are asked to provide personal information and migration details, including their identity, nationality, method of arrival, any immigration history and the reasons why they cannot return to their country of origin. The IPO collects biometric data, including photograph and fingerprints, and uploads this information to the EURODAC database. If an applicant has already claimed asylum in another country in the EU, they may be subject to transfer back to that country under Dublin III regulation.¹⁵

Following the preliminary interview, the interview transcript is read back to the applicant to allow for corrections or clarifications. The applicant is required to sign a declaration confirming the accuracy of the record, which becomes a formal part of the application. It is the applicant’s responsibility to ensure there are no misquotes or misunderstandings, and they will receive a copy of the agreed interview record.

Following the preliminary interview, the international protection application is either admissible or inadmissible.

Inadmissible:

- IPO will inform the applicant the reason for this decision which include them being granted international protection in another EU country or coming from a country which is deemed to pose no risk.
- Applicant can appeal¹⁶ this decision in writing to the International Protection Appeals Tribunal (IPAT) in Dublin within 10 working days of the date of notification of the refusal or voluntarily leave¹⁷ the country.

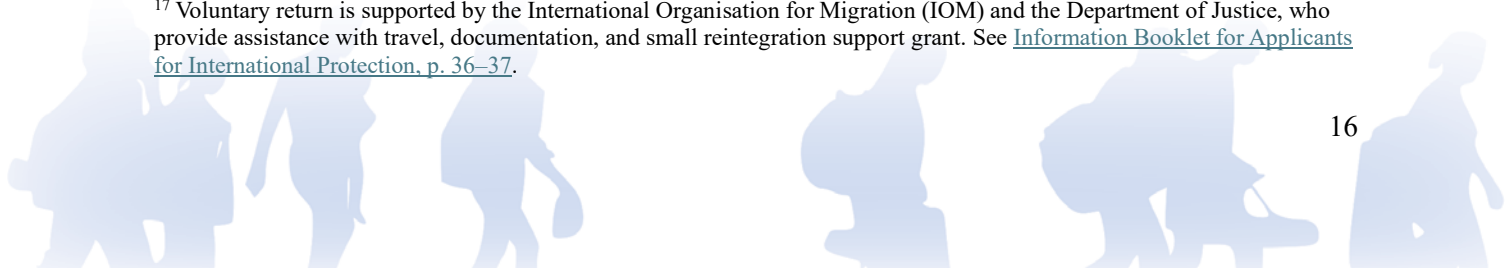
Admissible:

- Applicant will be allowed to proceed with the application.

¹⁵ [S.I. No. 525/2014 - European Union \(Dublin System\) Regulations 2014.](#)

¹⁶ Applicants are entitled to legal representation, either through the Legal Aid Board or a private solicitor at their own expense. See [Information Booklet for Applicants for International Protection, p. 28.](#)

¹⁷ Voluntary return is supported by the International Organisation for Migration (IOM) and the Department of Justice, who provide assistance with travel, documentation, and small reintegration support grant. See [Information Booklet for Applicants for International Protection, p. 36–37.](#)



- Accepted applicants can stay in Ireland while it is being processed.
- Applicant is not permitted to work or open a business.

General Scheme of the International Protection Bill 2025 and National Implementation Plan

Under the proposed system, the preliminary interview will be conducted earlier by the Immigration Officer as part of the initial security and identity checks. Eligible applicants will then be instructed to present at the IPO on the next working day to formally lodge their application.

Concerns raised at this stage:

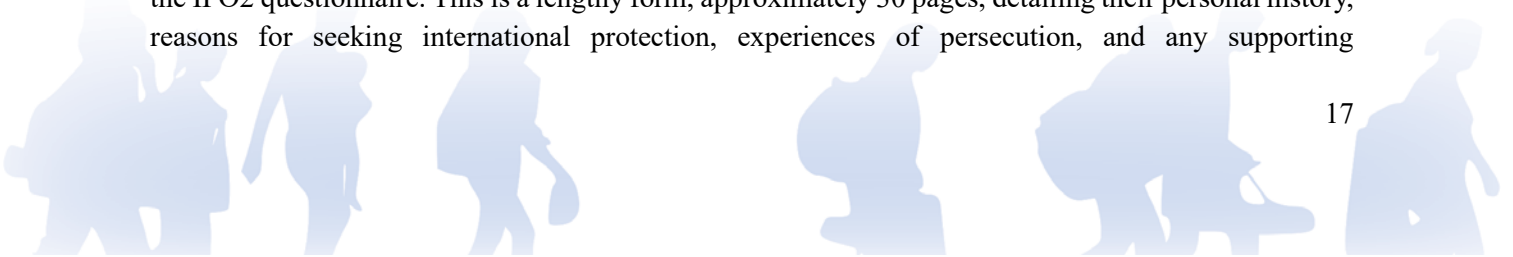
- Applicants frequently undergo preliminary interview without access to legal guidance/assistance. Legal guidance/assistance is not consistently available at this crucial, early stage of the process, which significantly increases the risk of procedural errors or gaps in presenting relevant legal grounds for protection. Without appropriate supports, applicants may not be fully informed about how their experiences relate to protection criteria or how to navigate complex procedural requirements, placing them at a disadvantage through no fault of their own.
- Interpretation during interviews is often provided by individuals who lack formal accreditation or professional training. This raises serious concerns about the accuracy and reliability of translation, especially when discussing complex legal or personal issues. Poor-quality interpretation can lead to miscommunication or misrepresentation, compromising the applicant's ability to respond effectively and assert their legal rights.
- Applicants may face multiple interviews within a short span including both verbal questioning and written forms, often while still emotionally distressed. Discrepancies between accounts can negatively affect the applicant's credibility and influence the outcome of their case. This increases the likelihood of miscommunication, misunderstandings, or failure to present a strong basis for protection.
- Requiring the applicant to sign a declaration confirming the accuracy of the record immediately after the interview can create significant challenges, particularly for those who are not literate or whose first language is not English. This may lead to errors or omissions that cause difficulties later in the process; more time should be allowed to ensure the declaration is accurate.
- The system does not systematically apply trauma-informed approaches. This can lead to re-traumatisation and result in incomplete or inaccurate testimonies from applicants who may be struggling with psychological distress or past violence.

Concerns arising from the *General Scheme of the International Protection Bill 2025* and NIP:

- Eligible applicants would have to present themselves at IPO on the next working day. This requirement puts immense logistical and psychological pressure on applicants, particularly for applicants from outside Dublin or those navigating immediate post-arrival stress, or transportation barriers.

Stage 3: International Protection Questionnaire (IPO2)

Under the current system, once an application is deemed admissible, applicants are required to complete the IPO2 questionnaire. This is a lengthy form, approximately 30 pages, detailing their personal history, reasons for seeking international protection, experiences of persecution, and any supporting



documentation. This stage typically takes place at the IPO office, often on the same day as the preliminary interview. Interpretation services and cultural mediators are officially available, following regulatory updates introduced in November 2022. However, in practice, significant procedural concerns persist. The Irish Refugee Council (2025) reports that cultural mediators, now referred to as Cultural Support Officers, have often not been present to assist applicants during this crucial stage. Even when present, it is important to note that they are not legal practitioners. In addition, the Irish Refugee Council notes that the translation services provided are frequently substandard, despite the central importance of the questionnaire to the international protection determination process.

General Scheme of the International Protection Bill 2025 and National Implementation Plan

Under the new system, the applicant must present at the IPO after initial screening to:

- complete a digital application¹⁸, including fingerprinting (EURODAC and security checks),
- receive scheduling for the substantive interview, and
- apply for accommodation.

Here, they can engage with external agency support services (NGOs, HSE, Legal Aid Board, Tusla) as required. Applicants will be further referred to one of four relevant pathways: border procedure; standard and accelerated procedure; inadmissible and Asylum and Migration Management Regulation (AMMR); or unaccompanied minors (UAM) procedure. **Figure 4** illustrates the revised flow of arrivals and screening under the new framework, including procedural filtering and the assignment to procedural pathways.

The proposed Bill lacks clarity regarding the status of applicants and the distinctions between different procedures e.g., screening, border, accelerated, and substantive. Without a clear legal framework and consistent terminology, both applicants and their legal representatives may face uncertainty about which rights and obligations apply (The Bar of Ireland, 2025). The proposed Bill also lacks clarity on when a person is deemed an applicant and how this status triggers associated rights, procedural timelines and a right to remain in the State.

In addition, applicants who come from a country where the refugee recognition rate is less than 20 per cent (across the EU) will be automatically referred to the accelerated border procedure. This risks creating a two-tier international protection system based on nationality and risks overlooking a person's individual reasons for applying, especially given that Ireland's average recognition rate for 2022 and 2023 stood at approximately 35 per cent (Irish Refugee Council, 2024). It replaces case-by-case assessment with statistical profiling, heightening the likelihood of unfair refusals and undermining non-refoulement¹⁹ obligations.

The AMMR replaces the current Dublin III regulation and reinforces stricter rules including an obligation to apply for protection in the Member State of first entry, increasing reliance on transfers between Member States, and introducing shorter deadlines for determining Member State responsibility (within 2 weeks instead of 2 months). It also broadens the grounds for detaining applicants pending Dublin transfers, such as in cases of 'risk of absconding' or 'obstruction of transfer procedures.' While this does not mandate detention, it expands the conditions under which it may occur. This is particularly relevant when applicants are already subject to movement restrictions, raising questions about how such

¹⁸ The new International Protection Applicant Portal allows international protection applicants in Ireland who have applied on or after 31 July 2024 to access to their application details, download application, and track the status of their application.

¹⁹ A core principle of international refugee law that prohibits States from returning refugees in any manner whatsoever to countries or territories in which their lives or freedom may be threatened on account of their race, religion, nationality, membership of a particular social group or political opinion. For more, check: [non-refoulement - European Commission](#)

a risk is meaningfully established. Civil society groups, including the Irish Refugee Council and Jesuit Refugee Service, have warned of potential automatic or arbitrary confinement without adequate, clear legal safeguards (Irish Refugee Council, 2024; Jesuit Refugee Service, 2024).

Additionally, the revised EUODAC regulation will expand biometric data collection (including facial images, identity data, and documents from children as young as six) and extend data retention to five years (for certain cases) and ten years (for applicants). These provisions involve privacy and data protection implications.

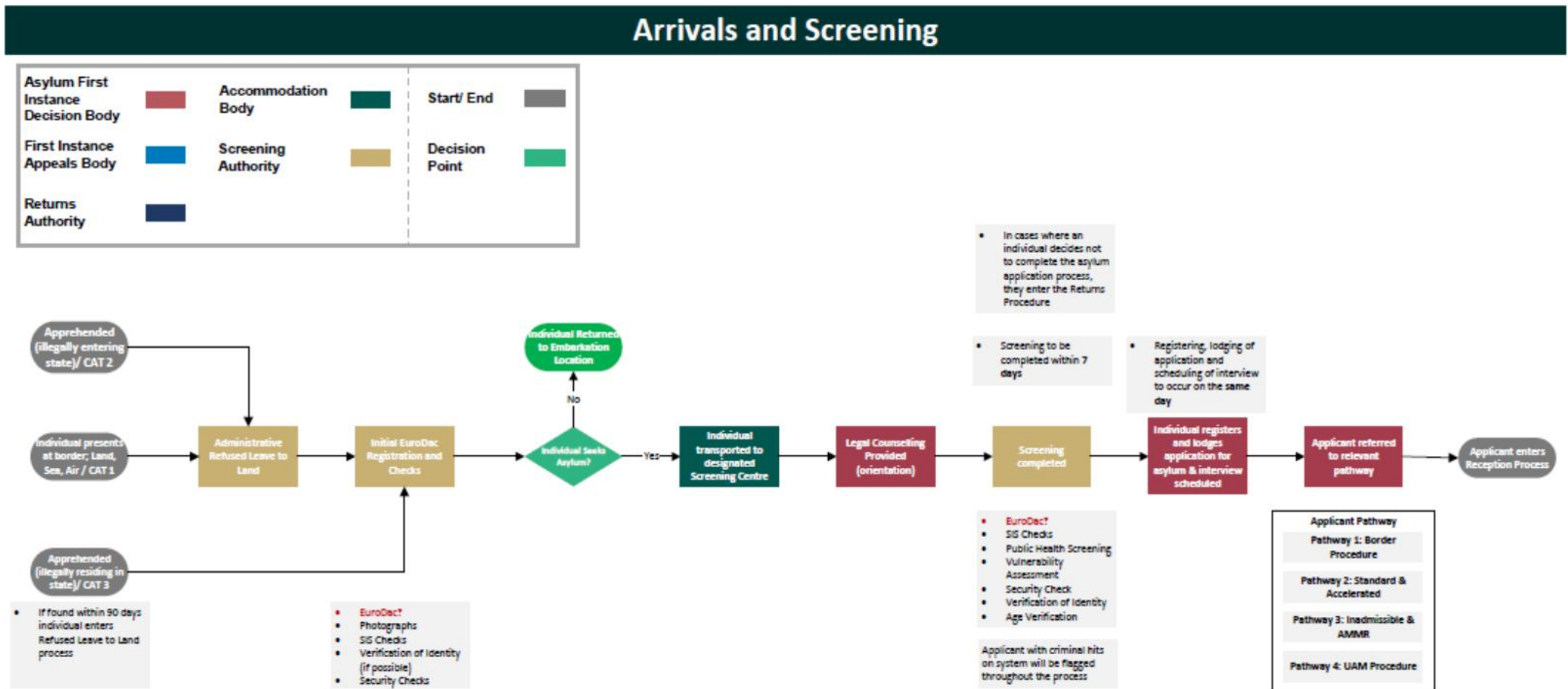
Concerns raised at this stage:

- Applicants often complete the IPO2 form without access to legal advice, trained interpreters, or cultural mediators. The absence of professional support, privacy, and guidance, especially when answering emotionally charged questions, can result in incomplete or poorly expressed narratives. Inadequate translation services further compromise the accuracy and nuance of responses, and such documentation flaws may later be used to challenge the applicant's credibility.
- Applicants thus navigate complex and often emotionally charged questions under significant stress and with limited assistance. The lack of time, privacy, legal guidance/assistance, and inadequate translation services at this critical step raises serious concerns about procedural fairness and the potential erosion of credibility assessments.
- Cultural mediators, also referred to as Cultural Support Officers, often not only support applicants as interpreters and guides but also fill out their questionnaires. Two types of issues arise: first, if the mediator has personal biases, they may not complete the form accurately; second, they may lack the legal understanding or expertise to do so properly. There is also no consistent vetting process, mediators are neither formally trained nor accredited - meaning no quality assurance or validation of their work.

Concerns arising from the *General Scheme of the International Protection Bill 2025* and NIP:

- Serious data protection concerns were raised regarding the coercive collection and long-term storage of sensitive biometric data, particularly for minors under EUODAC regulation. The permissibility of obtaining fingerprints and facial recognition from children under duress poses significant concerns about consent and coercion and is especially acute in the absence of legal safeguards.
- The assumption of digital fluency raises concerns about the exclusion of applicants with limited technological or language skills. While the online International Protection Applicant Portal is currently optional, the growing reliance on digital platforms for submitting applications, communication, and case tracking risks marginalising those without access to devices, stable internet, or sufficient literacy.
- More stringent detention rules apply under the new international protection system. This may disproportionately affect vulnerable individuals. This includes those who may not fully understand the legal process, who may have mental health issues, or who lack legal guidance/assistance. Frequent or prolonged detention can have severe psychological and humanitarian impacts, particularly when used pre-emptively or without adequate safeguards.
- Applicants who come from countries with EU-wide refugee recognition rates under 20 per cent may be subject to accelerated or border procedures by default. This creates a two-tier system that risks overlooking individual protection needs and undermines the principle of non-discrimination.

Figure 4: Arrivals and Screening



Source: *National Implementation Plan | Ireland: Implementation of the Pact on Migration and Asylum, p.59*

Stage 4: Reception and Accommodation by IPAS

Once an application has been deemed admissible, the applicant is referred to the International Protection Accommodation Service (IPAS), which is responsible for providing state-funded support during the processing period. Typically, applicants are placed in full-board facilities, where they receive accommodation, three meals a day, access to basic medical care, and a weekly allowance of €38.80 for adults and €29.80 for children. In situations where IPAS is unable to provide accommodation, an enhanced Daily Expenses Allowance of €113.80 per week is issued to eligible applicants.²⁰ However, those who willingly choose to self-accommodate are not entitled to any state financial support.

Despite the government's commitment to end Direct Provision, Ireland continues to remain reliant on ad hoc accommodation including hotels, converted warehouses, and temporary shelters. Conditions in these facilities have been widely criticised for their inadequate food, lack of privacy, and unsanitary living environments. As of late 2024, over 3,000 people experienced street homelessness due to shortages in available accommodation (European Council on Refugees and Exiles, 2024).

Importantly, there is growing legal scrutiny of the adequacy of reception conditions. In April 2023, the High Court ruled that the State's failure to provide adequate reception conditions to an international protection applicant was a breach of *Article 1 of the EU Charter of Fundamental Rights*, which is the right to human dignity. The current system has been in place for well over 20 years and comes in for continued criticism from a number of Oireachtas Committees and independent reports, from the people directly living in the system, and by both international and national human rights organisations (Social Justice Ireland, 2025).

Whilst there was an explicit commitment in the 2020 Programme for Government to end the system of Direct Provision, it is not mentioned in the 2025 Programme for Government. This must be understood in the context of a wider institutional shift in which the responsibility for immigration moved away from what had been the Department of Children, Equality, Disability, Integration and Youth and instead, now rests with the Department of Justice, Home Affairs and Migration (Social Justice Ireland, 2025).

Earlier efforts at reform, such as those outlined in the Report of the Advisory Group on the provision of support, including Accommodation to persons in the International Protection Process (The Day Report) (Department of Justice, 2020) and the corresponding White Paper, published in 2021 (Department of Children, Equality, Disability, Integration and Youth, 2021), which had set out a new integrated system, appears to have completely stalled. Rather than a move towards integrating new arrivals quicker into communities, the 2025 Programme for Government states that in future, 'applicants are provided with accommodation with restrictions on their movement to ensure the integrity of the process'.

The 2024 update of the *Asylum Information Database (AIDA) Country report* on Ireland further documents deteriorating conditions within IPAS centres. Since January 2024, the Health Information and Quality Authority (HIQA) has taken over the responsibility for inspecting IPAS centres using the legally binding National Standards for Accommodation Offered to People in the Protection Process. While a few centres were found to be compliant, the majority revealed serious shortcomings, including failures in safeguarding, governance, and responding to residents' specific needs. In one instance, a safeguarding concern involving four children was not managed in accordance with national policy. The report also highlighted a continued reliance on emergency centres comprised of disused offices, large conference rooms, schools, and sports halls to accommodate international protection applicants (Irish Refugee Council, 2025). Particularly alarming were "reports of alleged violence perpetrated by security

²⁰ [Daily Expenses Allowance](#)



officers working at Citywest against residents. Several residents sustained serious and life-altering injuries arising out of the alleged violence” (Irish Refugee Council, 2025). The absence of consistent Vulnerability Assessments further exacerbates these issues, with many individuals left in limbo or resorting to street homelessness, particularly single male applicants. Such reception conditions violate the *EU Reception Conditions Directive*, which mandates safe, dignified accommodation and access to support services (Irish Refugee Council, 2025)

These realities are echoed in the personal reflections of international protection applicants living in Direct Provision.

"I look through my stained window. There are fields in the distance. They seem too far away... I want to see the fields with my tired, sleepless eyes. I am afraid to leave room 24. I can't smell the fields. I am not able to smell the wildlife. It is just around the corner. There are walls and barriers on the way. I can leave the Centre to see the fields and smell the wildlife; but I am afraid that, if I leave the Centre, I won't be able to come into my room again. I could be stopped outside the Centre and asked by a stranger: 'How are things'? or 'Where are you going'? I wouldn't know what to answer. I want to say: 'I am going for a walk to see the fields and smell the wildlife'. But I am afraid. I say nothing. I make a few steps towards the green fields. They are too far anyway. I will try tomorrow again... I gently open the window; the smell of the canteen enters my habitat."

(Nedeljkovic, 2021)

This testimony captures the profound sense of isolation, surveillance, and restricted freedom that shapes daily life under Ireland's current reception model.

General Scheme of the International Protection Bill 2025 and National Implementation Plan

Under the *EU Migration and Asylum Pact*, the revised *Reception Conditions Directive* imposes minimum standards of assistance for international protection applicants by Member States, ensuring adequate standards of living for those arriving to the EU and seeking international protection.

However, as visualised in the NIP's Reception flowchart as shown in **Figure 5**, applicants are triaged into distinct accommodation pathways based on their assigned procedure: Border Procedure; Standard and Accelerated Procedure; Inadmissible/ and Asylum and Migration Management Regulation (AMMR); or unaccompanied minors (UAM) (managed end-to-end by Tusla). Crucially, access to accommodation is contingent on the applicant explicitly requesting it. If no request is made, the applicant exits the reception process entirely. This conditional approach introduces a significant barrier, particularly for applicants unfamiliar with their entitlements, experiencing language or psychological barriers, or fearful of state authorities.

The new system offers a tiered model of designated reception centres:

- **Border Procedure Centres** which include translation services, helpdesks, psycho-social supports, access to international protection payments and exceptional needs payments, community and mental health services, legal counselling, services for children, information provision, and increased security and monitoring. If applicants receive a negative decision

under the border procedure, they are immediately transferred to basic needs centres, and all entitlements cease.

- **Standard Needs Centres** which provide material reception conditions. This includes access to the labour market after six months (if no first-instance decision has been made), integration services (including language, training, and educational opportunities), translation services, psycho-social supports, international protection payments (including exceptional needs payments), access to mental health and education services, legal counselling, and information provision.
- **Basic Needs Centres** will provide minimal support within a three-month timeframe, including translation services, helpdesks, psycho-social supports, community and mental health services, legal counselling, and provision of information.

Concerns raised at this stage:

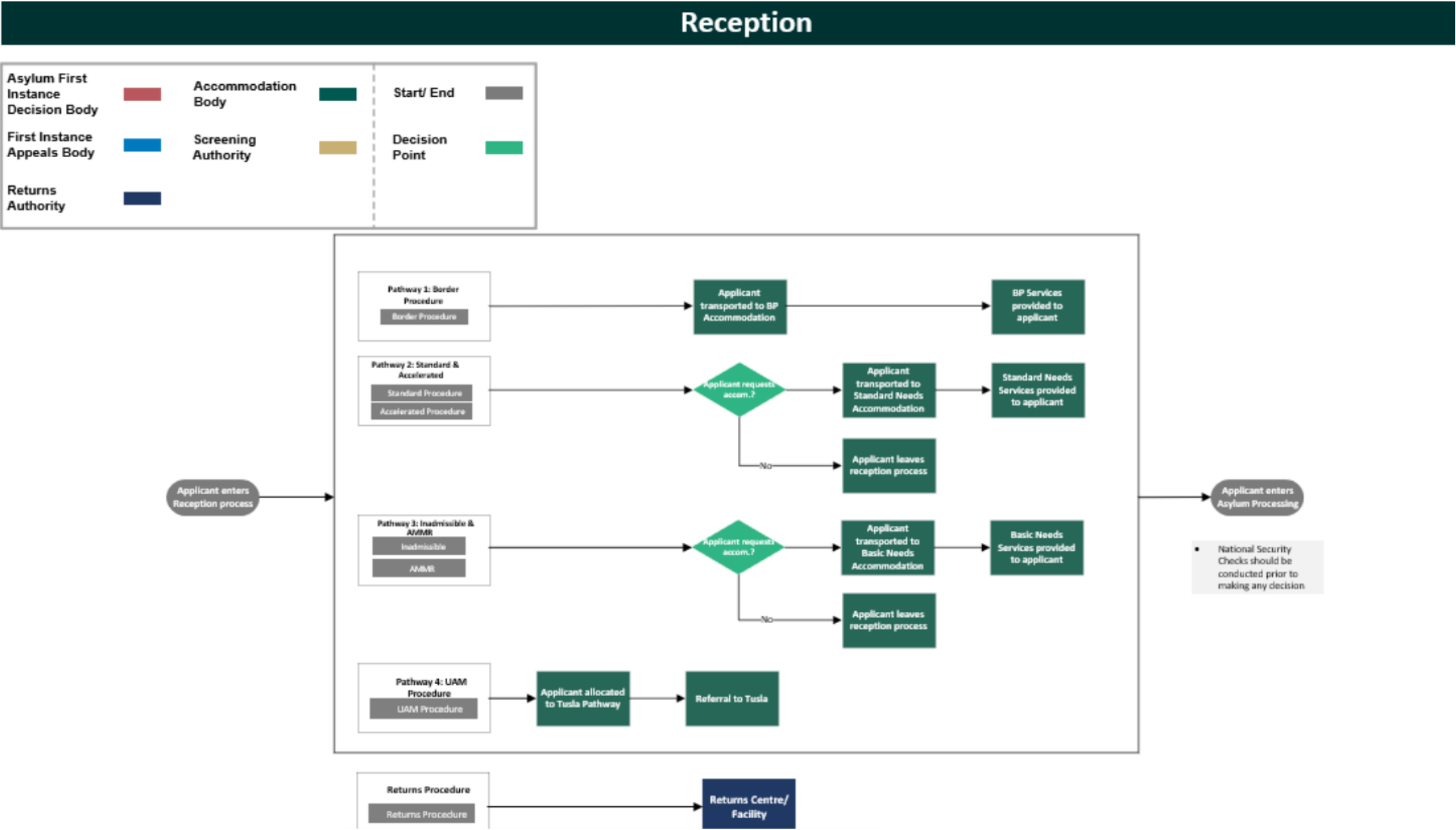
- Despite a commitment to end Direct Provision, reliance continues on ad hoc facilities like hotels, hostels, warehouses, and communal shelters, often with poor standards. These facilities lack privacy, are overcrowded, and provide insufficient nutrition and hygiene, all of which violate basic dignity and wellbeing.
- Vulnerable individuals, including women and children, face safeguarding risks.
- The ongoing housing crisis raises doubts about the feasibility of ending Direct Provision and shifting to reception and integration centres.

Concerns arising from the *General Scheme of the International Protection Bill 2025* and NIP:

- Under the new model, applicants must explicitly request accommodation to receive it. Those who do not, either due to lack of information, fear of authorities, language barriers, or other reasons, are excluded from the reception process altogether. This conditional model risks excluding vulnerable individuals from essential shelter and services, effectively leaving them homeless at a time when they are most at risk.
- The new reception model outlines varying levels of support based on the legal procedure they are routed into. This creates a tiered system of reception support, leading to unequal access to services based on procedural category rather than need.



Figure 5: Reception Process



Source: *National Implementation Plan | Ireland: Implementation of the Pact on Migration and Asylum, p.67*

Stage 5: Substantive Interview (Personal Interview)

Following the submission of the IPO2 questionnaire, applicants are scheduled for a substantive (personal) interview with a caseworker from the IPO. This interview is a pivotal moment in the protection process, as it serves as the primary forum through which applicants can explain their reasons for seeking asylum and substantiate their fear of persecution. Applicants are advised to seek legal guidance/assistance prior to this interview and may request interpreter services even if they have some command of English.

During the interview, applicants must discuss their journey, the persecution or threats they have faced, what was involved, and any other relevant circumstances. Supporting documentation such as medical reports, identity papers, or witness testimonies can also be submitted at this stage. The IPO caseworker records the interview, and the applicant is asked to verify and correct the transcript to ensure its accuracy. Solicitors may be present during the interview but are not permitted to speak on behalf of the applicant.

Applicant may have to wait some time before being called for the personal interview. Priority is given if the applicant is -

- Under 18, or was under 18, when they applied, and is not accompanied by an adult.
- Over 70 and not part of a family group.
- Has provided a medico-legal report that confirms being tortured or ill-treatment in their own country.
- From Syria, Eritrea, Iraq, Afghanistan, Iran, or Libya.
- Has a severe or life-threatening health condition.

General Scheme of the International Protection Bill 2025 and National Implementation Plan

Although this step is not directly targeted by the Pact, the broader institutional push for accelerated procedures across Member States increases the risk that applicants will complete their questionnaires under greater time pressure and with diminished access to legal and linguistic support. Under the Asylum Procedure Regulation, applicants from countries with EU-wide recognition rates below 20 per cent are automatically referred to accelerated or border procedures. This statistical profiling, based on the presumption that applicants are from 'safe' countries, risks undermining a case-by-case assessment of protection needs. It fails to account for minority populations or individual vulnerabilities within those countries. As a result, substantive interviews for these applicants are often rushed, with minimal legal advice or preparation time, increasing the risk of wrongful rejections. The Irish Refugee Council (2025) reports that applicants subjected to the accelerated procedure often do not receive legal advice prior to their substantive interview. This is attributed both to the short turnaround time between initial registration and interview, and to applicants not being informed of their right to seek free and impartial legal support through the Legal Aid Board at the point of application.

Concerns raised at this stage:

- Delays in scheduling substantive interviews for those in standard procedure prolong the period of uncertainty for applicants, which can negatively affect mental health and delay access to integration pathways like education, employment, and housing.
- Language barriers and unqualified interpreters may result in critical miscommunications, particularly in describing sensitive issues such as trauma or persecution, thus undermining the quality of the applicant's testimony.

- Lack of legal guidance/assistance, or insufficient time to prepare for those in accelerated procedures, leads to inadequately supported claims. Without legal guidance/assistance, applicants may not understand what is required to establish credibility or satisfy legal thresholds.
- Logistical and familial barriers, such as lack of childcare, prevent meaningful engagement. This disproportionately affects single-parent applicants who may be excluded from interviews due to the prohibition on children attending.
- Accelerated procedures for applicants from countries with less than 20 per cent EU-wide recognition rates, can bypass essential support mechanisms. The rigid timelines and presumptions about country safety increase the likelihood of unfair refusals and breaches of fundamental rights.

Stage 6: Application for Labour Market Access

If no first-instance decision has been issued within five months of submitting their application, the applicant may apply for permission to work.²¹ If granted, the permission is valid for 12 months and may be renewed. Income above €125 per week for 12 weeks or more will result in the suspension of the applicant's Daily Expenses Allowance (DEA), although this does not affect payments to other family members.²²

Labour market access was introduced in July 2018. Between then and December 2022, over 15,000 applicants sought permission, with approximately 12,181 granted access. However, only around half (5,428) reported employment to the Department of Justice's Labour Market Access Unit, with many working in low-paid roles such as general operatives, healthcare assistants, and kitchen porters. While some of the practical barriers, including access to driving licences and bank accounts, have been addressed, broader challenges persist. These include remote accommodation centres disconnected from job markets, limited childcare, employer reluctance, and the absence of targeted integration supports. Social issues like racism and structural issues like lack of recognition of qualifications also hinder labour market integration (Polakowski & Cunniffe, 2023).

A further concern is that once a first-instance decision is refused and the case is appealed, applicants lose their right to work during the appeal process, despite the fact that appeals before IPAT take, on average, 10–12 months,²³ with some lasting up to 69 months. This prolonged exclusion from the labour market during appeals undermines self-sufficiency and increases dependency on State supports.

General Scheme of the International Protection Bill 2025 and National Implementation Plan

Under the new framework, access to the labour market will only be permitted after six months, and only where a first-instance decision has not been made by the Asylum First Instance Decision Body. Moreover, only standard procedure applicants will be allowed to access the labour market. This restriction excludes those in accelerated or border procedures, reinforcing a two-tier system and further marginalising applicants from countries with lower EU-wide recognition rates.

Roundtable members expressed concern that this change presumes the State will meet its decision-making timelines, despite scepticism about the IPO's capacity to do so. Where timelines are missed, the system should be flexible enough to allow all applicants the dignity of work. Moreover, in practice,

²¹ [Labour Market Access Permission - Immigration Service Delivery](#)

²² [Daily Expenses Allowance](#)

²³ oireachtas.ie/en/debates/question/2025-02-25/619/

applicants may still face long appeals processes during which the same barriers to labour market access persist. Labour market access and adequate support for applicants during this extended period is essential to maintain dignity and promote self-sufficiency.

According to the NIP, the Department of Justice is planning for an average nine-month end-to-end process from arrival to integration or return decision under the EU Pact, with national targets for appeals and returns to follow. However, while this timeline is positive, if not met, applicants who have applied for appeal may face extended periods without income or work opportunities. In addition, proposed movement restrictions may further limit applicants' ability to access employment. These restrictions raise not only practical barriers but also human rights concerns, echoing earlier issues regarding de facto detention in the protection process.

Concerns raised at this stage:

- Bureaucratic delays in issuing or renewing labour market permissions cause instability for applicants and employers alike, leading to disrupted employment and income insecurity.
- Applicants often face restricted access to job sectors due to their temporary legal status and may encounter exploitative working conditions in low-paid and precarious jobs.
- Childcare responsibilities and lack of support services limit access to employment opportunities for parents, especially single caregivers who struggle to balance job demands with caring for young children.
- Structural barriers such as non-recognition of foreign qualifications and social barriers such as racism, and employer discrimination, reduce the chances of securing jobs that match applicants' skills and experience, hindering long-term integration.
- Denying labour market access to international protection applicants during the appeal stage risks prolonged dependency on state supports, social isolation, and loss of skills, regardless of the final outcome of their case.

Concerns arising from the *General Scheme of the International Protection Bill 2025* and NIP:

- Exclusion of applicants in accelerated or border procedures denies them equal opportunity to engage in meaningful work, potentially leading to prolonged dependency and social isolation.
- Proposed movement restrictions could further limit applicants' ability to access employment, raising both practical and human rights concerns.

Stage 7: IPO Recommendation to Ministerial Decisions Unit (MDU)

The IPO makes a recommendation to the MDU, which issues a first-instance decision on the protection claim. Applicants may be granted refugee status, subsidiary protection, permission to remain, or may be refused entirely. A negative decision triggers the release of a return order. A refusal may be appealed to IPAT under the current framework, with a time limit of 10 working days for accelerated applications and 15 working days for standard refusals.

In 2024, Ireland received 18,560 applications for international protection and issued 13,099 first-instance decisions, of which 3,888 were positive – an overall protection rate of 30 per cent (Irish

Refugee Council, 2025). Median processing time was 18 months, though accelerated procedure claims averaged just 3 months, while some cases took up to 72 months to resolve (Minister for Justice, 2025).

General Scheme of the International Protection Bill 2025 and National Implementation Plan

The IPO will be replaced by a new streamlined decision-making body under the proposed Bill and NIP. This new body will issue single first-instance decision on refugee status, subsidiary protection, and return/permission to stay, followed by a single appeal covering all the outcomes. Return decisions will be issued in tandem with a negative international protection decision and will proceed unless successfully appealed within five days.

Figure 6 illustrates this updated process flow.

The new system also plans to introduce seven cohorts of international protection processing with strict deadlines:

- Standard Procedure – 6 months completion timeframe
- Border Procedure – 3 months completion timeframe (further 3 months to return where appropriate)
- Accelerated Procedure – 3 months completion timeframe (further 3 months to return where appropriate)
- Asylum and Migration Management Regulation (AMMR) – 2 months completion timeframe
- Inadmissible – 2 months completion timeframe
- Subsequent applications – 2 months completion timeframe
- Withdrawals – 2 months completion timeframe

Concerns raised at this stage:

- Despite improvements in capacity, significant delays and case backlogs remain and continue to undermine timely protection. This may contribute to applicant distress and institutional strain.

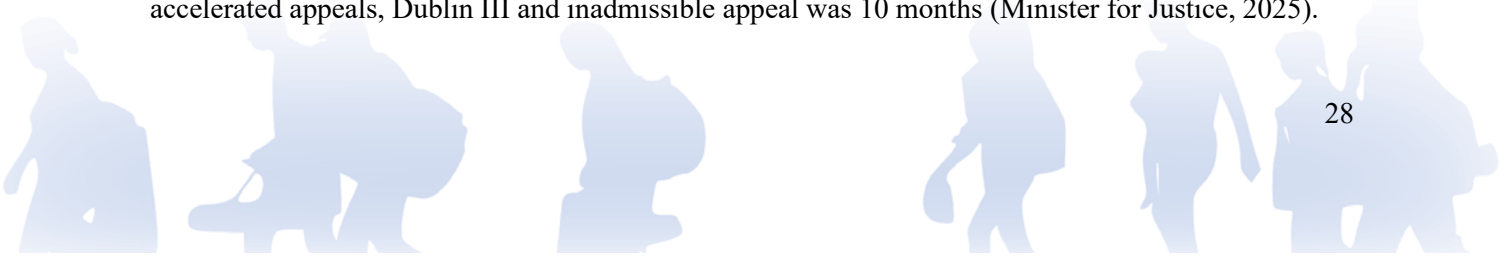
Concerns arising from the *General Scheme of the International Protection Bill 2025* and NIP:

- Over-reliance on a single caseworker's discretion raises concerns around consistency, objectivity, and transparency, particularly in complex or vulnerable cases.
- The automatic issuance of return orders alongside protection refusals, though procedurally efficient, can cause confusion for applicants who may mistakenly believe they have no further options. With only five days to lodge an appeal clear, accessible information and legal guidance/assistance are essential to ensure applicants understand and act within their rights.

Stage 8: Final Decision by MDU

The MDU issues the final decision, often in line with the IPO recommendation. If international protection is denied and appeals are unsuccessful or not lodged, the MDU may assess other grounds for granting leave to remain. If protection or leave to remain is granted, applicants must register with their local immigration office.

In 2024, the International Protection Appeals Tribunal (IPAT) application processing time for accelerated appeals, Dublin III and inadmissible appeal was 10 months (Minister for Justice, 2025).



General Scheme of the International Protection Bill 2025 and National Implementation Plan

Under the proposed changes, should an applicant who received a negative decision and return decision lodge an appeal, it must be within five-days. During this time, the applicant will enter the returns process while their appeal is under consideration.

Figure 6 and **Figure 7** provide a flowchart of appeals and returns procedure.

A new appeal structure will replace the existing IPAT. There will be only one appeal after a first-instance decision, covering both the international protection application and return decision.

The five types of appealable decisions are to:

- Reject an application as inadmissible.
- Reject an application as unfounded or manifestly unfounded in relation to both refugee and Subsidiary Protection status.
- Reject an application as implicitly withdrawn.
- Withdraw international protection.
- Issue a return decision in accordance with Article 37.

The provision stating that the Second Instance Body shall make its decision without holding an oral hearing introduces a significant procedural concern. In the context of international protection, applicants' credibility and personal circumstances are often best assessed through in-person interaction, making the lack of an oral hearing a potential barrier to a full and fair evaluation of their claims.

Concerns raised at this stage:

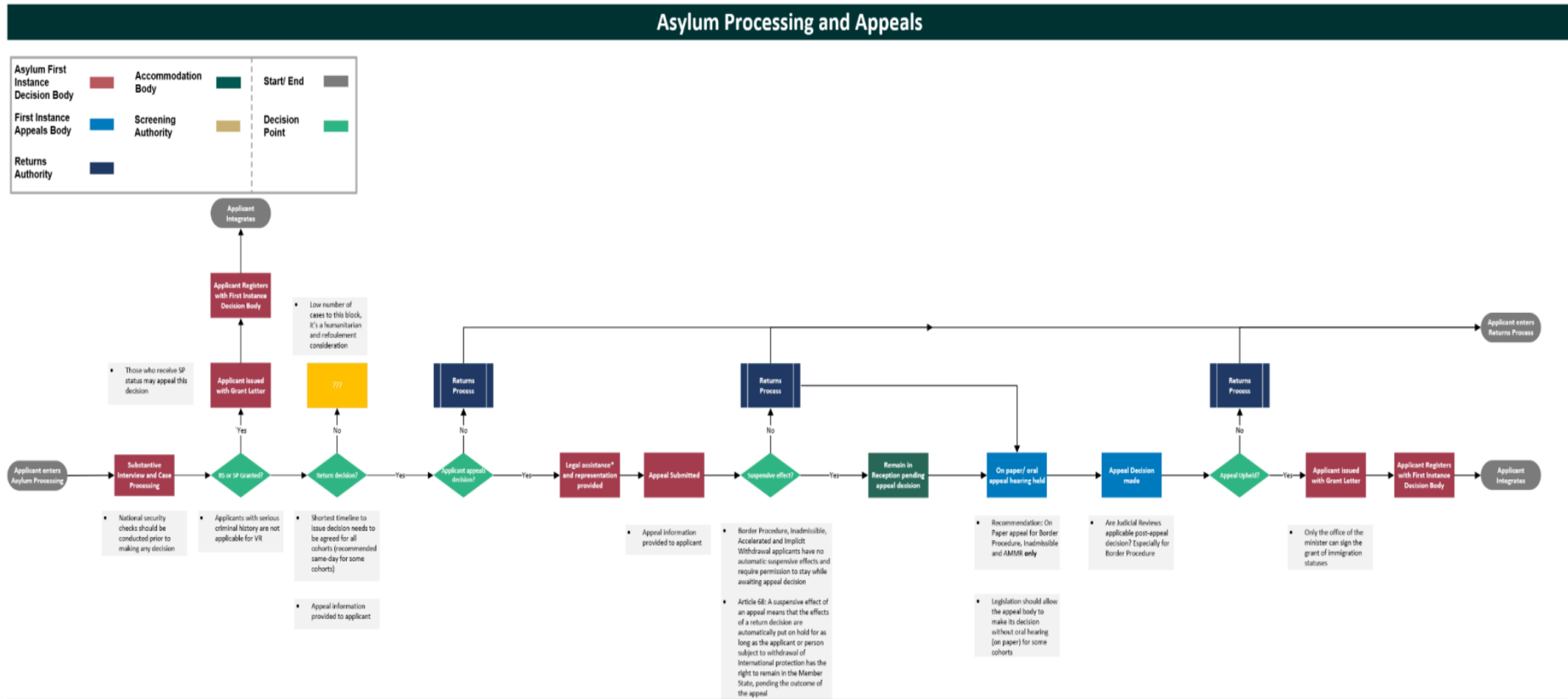
- Simultaneous delivery of refusal decisions and deportation orders creates confusion and distress. Applicants in receipt of multiple legal decisions at once may struggle to understand the implications or seek timely legal advice.
- Delays and inconsistencies in decision-making timelines erode trust in the protection process. While the new framework sets ambitious timelines, recent data from 2024 show that IPAT took up to 10 months to process accelerated, Dublin III, and inadmissible appeals, calling into question the system's capacity to meet the proposed deadlines.

Concerns arising from the *General Scheme of the International Protection Bill 2025* and NIP:

- The shortened five-day appeal window puts applicants under immense pressure, particularly those with limited access to legal advice or interpretation services. It risks excluding vulnerable applicants from the appeals process altogether due to procedural barriers rather than the merits of their claim.
- The removal of oral hearings at the second-instance stage raises serious procedural fairness concerns. Applicants will be required to submit appeals in writing, which may limit their ability to explain misunderstandings, correct factual errors, or establish credibility, especially in trauma-related or complex cases. Without the opportunity to be heard in person, applicants may be disadvantaged in making a full case for protection.

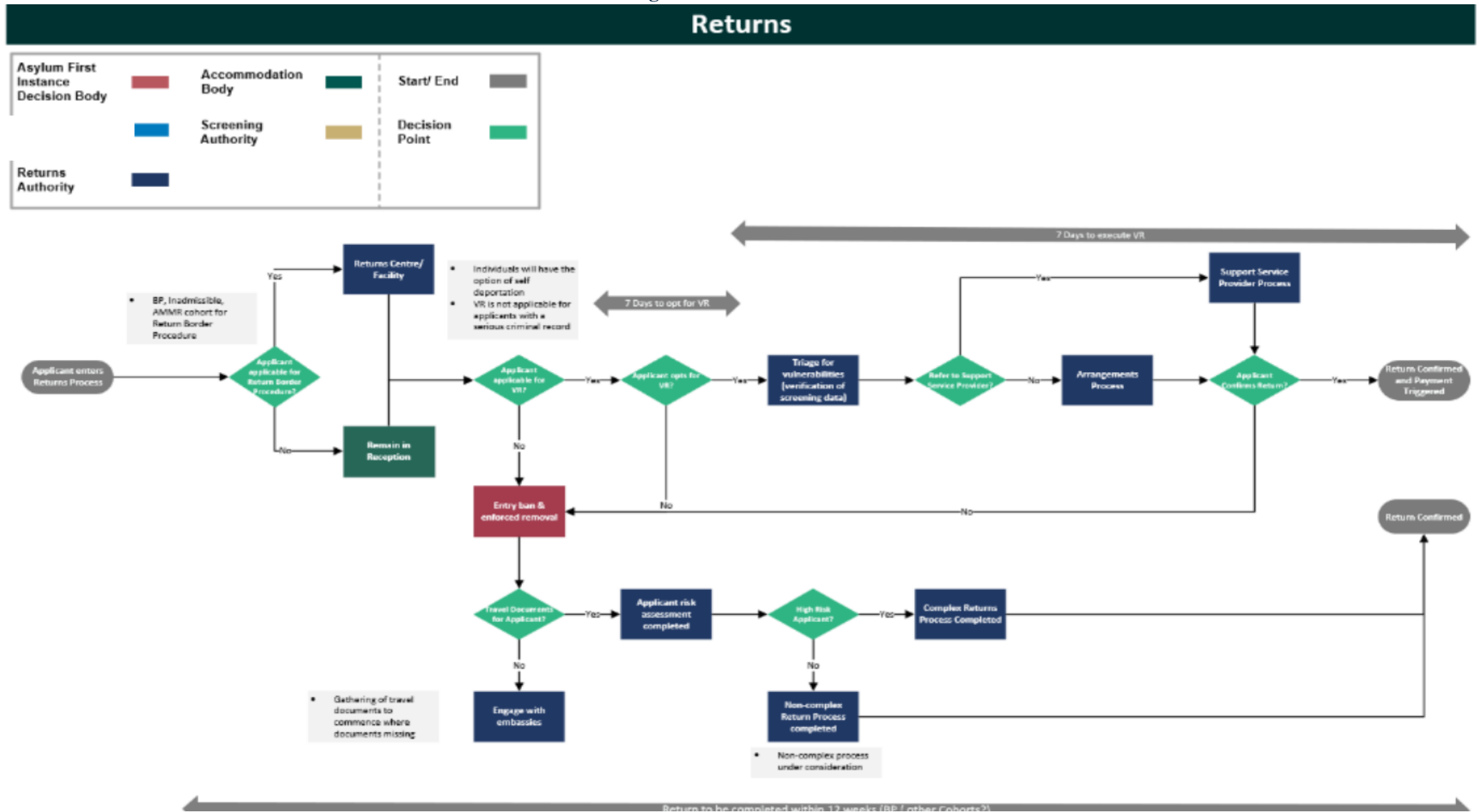


Figure 6: Asylum Processing and Appeals



Source: *National Implementation Plan | Ireland: Implementation of the Pact on Migration and Asylum, p.80*

Figure 7: Returns Process



Source: *National Implementation Plan | Ireland: Implementation of the Pact on Migration and Asylum, p.87*

Stage 9: Post-Decision: Transition or Exit

Upon receiving a declaration of protection or leave to remain, applicants become eligible to work, can apply for social housing, and receive social welfare supports. They may also exit IPAS accommodation. However, in practice, many remain in Direct Provision or emergency accommodation due to Ireland's ongoing housing crisis. Despite having legal status, they often continue to live in transitional limbo.

A report by ESRI found that beneficiaries of international protection (BIP) “face significant challenges and barriers in trying to access autonomous housing, and that these have resulted in almost 6,000 people with status remaining in International Protection Accommodation Services (IPAS) accommodation as of January 2024” (Murphy & Stapleton, 2024). This backlog reflects both the shortage of affordable housing and the absence of targeted transition assistance to support access to independent living.

The same study also reported additional challenges and barriers that beneficiaries of international protection (BIPs) experience. Many of these challenges stem from a combination of systemic and individual factors. Language barriers, psychological distress linked to previous trauma and the asylum process, and limited understanding of the Irish housing system all hinder transition. Discrimination in the private rental market, as well as confusion among local authorities regarding BIPs' entitlements, further complicate housing access. Additionally, isolated reception centres negatively impact mental health, employment outcomes, and access to community services, thereby impeding long-term integration. While targeted supports such as caseworker assistance and housing transition services have been introduced, the ESRI report highlights that these services are overstretched and unevenly distributed. Caseworkers often support large caseloads, and specialist services are mostly concentrated in urban areas, leaving rural-based BIPs with limited support (Murphy & Stapleton, 2024).

Roundtable participants also highlighted the experiences of discrimination, both racist and religious in nature, encountered in society and when accessing state services. One participant recounted accompanying a beneficiary of international protection to a state service:

The beneficiary wears a hijab. In the course of filling out a form the person at the desk said to her, if you are going to live here in Dublin you do not need to wear "that thing" we are liberated women here.

Roundtable Member

This incident reflects the prejudice and stereotyping that can persist even after applicants are granted leave to remain. Such experiences undermine integration, perpetuate marginalisation, and run counter to Ireland's obligations under equality and human rights law.

General Scheme of the International Protection Bill 2025 and National Implementation Plan

The NIP indicates that a broader integration strategy is under development, led by the Department of Children, Equality, Disability, Integration and Youth (now restructured as the Department of Children, Disability and Equality). However, with this restructuring, the future scope and direction of the strategy remain unclear. No updated operational measures have yet been published, leaving uncertainty about how status-holders will be supported post-recognition.



Concerns raised at this stage:

- Geographic and capacity disparities in transition services hinder equitable integration. Existing supports such as housing officers and caseworkers are often overstretched and primarily located in urban centres, leaving status-holders in rural areas with limited or no access to assistance.
- Institutional confusion and poor inter-agency coordination undermine service delivery. Local authorities frequently lack clear guidance on the rights and entitlements of beneficiaries of international protection, particularly regarding access to housing and family reunification, resulting in inconsistent implementation and delays.
- Continued residence in IPAS accommodation post-recognition reflects a structural failure to facilitate timely transition into autonomous housing, exacerbating dependency and undermining the goal of self-sufficiency.

This mapping of the protection process reveals both the complexity and vulnerability built into the system. The following section analyses the overarching structural challenges that hinder the development of a protection system that is rights-based, effective, and sustainable.



Structural Challenges in the International Protection Process

A step-by-step analysis of Ireland's international protection process reveals not only administrative complexity but also deep-rooted, systemic barriers that undermine the rights and dignity of applicants. These challenges are not confined to one stage but recur along the international protection journey, exacerbated by underinvestment, policy ambiguity, and emerging EU legal obligations. The following cross-cutting concerns emerge:

Procedural Fairness and Legal Safeguards

The lack of consistent legal assistance and translation services undermines procedural fairness. Inadequate interpretation, poor access to legal aid, and accelerated procedures without meaningful safeguards jeopardise the integrity of the system. Access to early and continuous legal assistance is a requirement of the Asylum Procedures Regulation (including the Return Border Procedure Regulation) as part of the *EU Pact on Migration and Asylum*. Under this regulation, all applicants for international protection must receive free legal counselling during the administrative stage of the procedure, including information on the rights and obligations, assistance for lodging an application; information on how to challenge a rejection decision and free legal assistance and representation during the appeal stage upon the request of the applicant (European Commission, 2024).

In current practice, the IPO issues information sheets often in English, with QR codes providing links to translated versions (The Bar of Ireland, 2025). Given the strict timeframes under the proposed Bill and the potential for limited literacy or vulnerability among applicants, it is essential that information be provided in the person's own language, with checks in place to ensure that the information has been delivered and understood appropriately. This should be detailed to include the provision of the information in written form (whether read by or read to the applicant concerned) and that applicants should confirm receipt and understanding by signature. The inclusion of oral delivery under the proposed Bill is a welcome safeguard, so long as it is used to confirm in the content of the written information applicant's language and is not used as a substitute for it.

Ireland's current system does not yet meet these minimum standards. Legal assistance is generally limited to the appeals phase and is often unavailable during the preliminary interview or completion of the IPO2 questionnaire, both of which are determinative of an applicant's credibility and case trajectory. This procedural gap risks undermining the fairness of the system and Ireland's compliance with EU law. This is something that Council of The Bar of Ireland has also noted in its response to the *General Scheme of the International Protection Bill 2025*. These procedural shortcomings are further compounded by emerging digital reforms, which are reshaping how applicants access and experience the protection process in Ireland.

Digitalisation, Biometric Collection and Data Privacy

The revised EURODAC Regulation significantly expands the scope of data collection in asylum procedures, introducing requirements to gather not only fingerprints but also facial images, identity data, and copies of identity or travel documents. Notably, biometric data will now be collected from children as young as six years old. While this aligns with the broader EU Pact on Migration and Asylum objectives to streamline data management and curb secondary movements, it also raises serious ethical and data protection concerns.



The proposed Bill mandates extensive biometric data collection during early stages of the international protection process, including during screening and registration. However, it lacks detailed provisions on how consent, especially from minors will be obtained, what procedures are in place to challenge or rectify errors, and how long such sensitive data will be stored (The Bar of Ireland, 2025). Under EURODAC, data may be stored for up to 10 years, and even longer in cases where individuals are subject to return procedures.

In addition to expanding the scope of data collection, the proposed framework also digitalises the international protection process. In Ireland, applicants now have the option to submit their applications online through the International Protection Application Portal, which provides “real-time” updates on the status of their applications at the IPO stage. However, this system does not extend to appeals. Although the digital process is presented as optional, in practice the choice is constrained by disparities in digital literacy, device access, and English proficiency. Applicants who opt out may face slower communication and reduced transparency, while those who opt in must navigate complex digital systems with minimal support. Without robust accessibility measures (such as multilingual platforms, digital helpdesks, and in-person assistance), this model risks digitally excluding some of the most vulnerable individuals from fair participation in the protection process. These challenges are further exacerbated by the limited availability of early legal guidance as mentioned earlier, leaving applicants without the necessary support to understand or effectively engage with digital procedures.

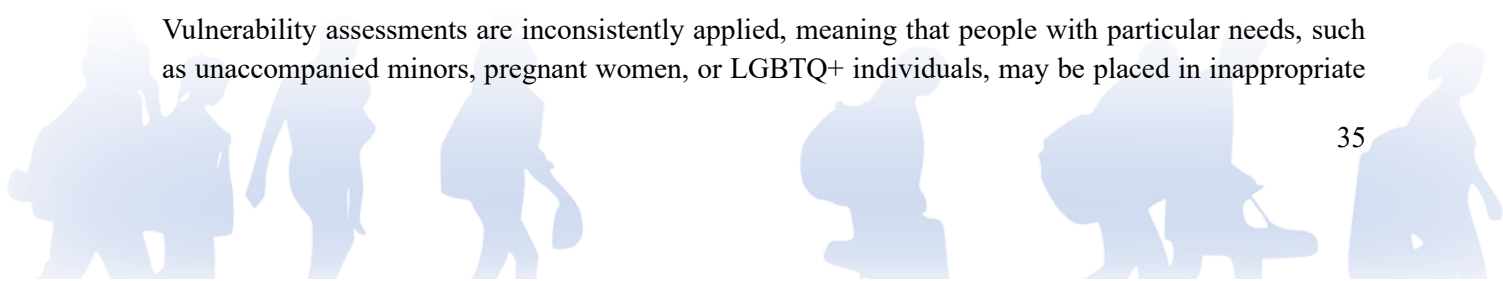
Furthermore, the integration of biometric data into return procedures, and the linkage of personal data with law enforcement and border control databases, reinforces a securitised and punitive orientation. Civil society organisations, including the Irish Refugee Council, have warned that increased provision for surveillance and data-sharing will increase criminalisation, securitisation, and racialisation of the international protection system and also risks undermining trust and threatens the credibility of the international protection process (Irish Refugee Council, 2024). Without robust national-level safeguards including transparency on data retention, right to rectification, and independent oversight there is a real danger of rights violations, particularly among children, survivors of violence, and stateless individuals.

Reception Conditions and Accommodation

Despite a government commitment to end Direct Provision, Ireland remains reliant on ad hoc accommodation including hotels, converted warehouses, and temporary shelters. International protection applicants report inadequate food, lack of privacy, and unsanitary facilities. Over 3,000 people experienced street homelessness due to accommodation shortages as of late 2024 (European Council on Refugees and Exiles, 2024).

However, the NIP now introduces a tiered accommodation model, dividing reception into three core categories: border procedure centres, standard needs centres and basic needs centres. As mentioned earlier, each is linked to the applicant’s procedural pathway (e.g. standard, accelerated, inadmissible, AMMR). While these categories are intended to streamline the reception system, they introduce a tiered model in which access to services and protections depends on the procedural stream assigned. This raises concerns about equality of treatment and the adequacy of safeguards. In addition, access to accommodation is made conditional upon an explicit request by the applicant. Those who do not apply, whether due to lack of information, fear of authorities, language barriers, or other vulnerabilities, are excluded from the reception process altogether. This conditional approach risks excluding individuals most in need of protection, leaving them without shelter or essential support at a time of acute vulnerability.

Vulnerability assessments are inconsistently applied, meaning that people with particular needs, such as unaccompanied minors, pregnant women, or LGBTQ+ individuals, may be placed in inappropriate



settings. This violates Ireland's obligations under the EU Reception Conditions Directive which requires Member States to "ensure a standard of living adequate for the health of applicants and to enable their subsistence." Although Ireland is in a period of transition ahead of implementing the *EU Pact on Migration and Asylum*, it is important to note that the Pact's new Reception Conditions Regulation reaffirms and strengthens existing legal obligations. The current lack of legal clarity in the NIP about how material reception standards will be upheld, particularly in basic needs centres and border procedures centres, risks further rights violations if not properly addressed.

Administrative Delays, Bureaucratic Backlogs, and Quality

Despite policy commitments to streamline decision-making, long processing times persist across the IPO and IPAT. Median IPO first-instance processing time for normal procedures stretched to 18 months in 2024, while some applicants have waited over 72 months (six years) for a final decision, whereas median IPAT application processing time for accelerated procedure was nine months and some applicants had to wait over 69 months (Minister for Justice, 2025).

These prolonged timelines leave applicants in legal limbo, unable to work, study, or plan for the future. They also place strain on accommodation services and contribute to poor mental health outcomes for those stuck in uncertainty.

The NIP introduces an overhauled structure of asylum procedures, promising streamlined, single-instance decisions and strict timelines across seven procedural cohorts as mentioned earlier. While these timelines align with the *EU Pact on Migration and Asylum* and are designed to address existing delays, there are serious concerns about implementation capacity. The NIP acknowledges staffing needs, but planned increases in personnel appear to focus largely on administrative resources, with limited mention of additional interpreters, qualified legal advisors, or mental health professionals. Furthermore, proposed staff training focuses mainly on digital tools and data systems, neglecting trauma-informed or cultural sensitivity training - both of which are essential for ensuring procedural fairness in high-stakes protection decisions.

Another emerging issue is the assumption that digitalisation alone will resolve administrative inefficiencies. While the NIP's end-to-end processing system aims to improve speed and coordination, its success still depends on adequate staffing, proper training, and ensuring applicants can meaningfully access and navigate the system.

Without adequate investment in human resources, legal assistance, and accessibility measures, there is a real danger that accelerated decision-making will compromise the quality and fairness of asylum determinations. This risks further litigation and procedural errors.

Vulnerability Assessments and Trauma-Informed Care

Ireland's vulnerability assessment system has experienced inconsistent application, despite its critical role in identifying applicants who may require additional procedural safeguards. After being suspended in early 2023, formal vulnerability assessments were partially reinstated in 2024 for families and select cases, while triage-based screenings for single male applicants became the norm. This piecemeal approach risks failing to detect trauma, disability, or other conditions that could significantly impact an applicant's ability to engage with the international protection process. According to the Irish Refugee Council (2024), this failure to comply, particularly when combined with the expansion of detention powers under the *EU Pact on Migration and Asylum*, could have significant consequences for the rights and wellbeing of people seeking protection (Irish Refugee Council, 2024).



Moreover, the proposed Bill provides no clear mechanism for administrative review or appeal in relation to vulnerability determinations (The Bar of Ireland, 2025). This omission is significant, particularly given that decisions made during early screening stages can profoundly shape the trajectory of an applicant's case. While the NIP references the need for triaging and streamlining vulnerable cohorts, it does not establish binding procedures, robust legal safeguards, or the involvement of independent medical or psychological professionals in these assessments. In addition, the NIP's emphasis on digital processing overlooks the increased barriers digital systems may pose to trauma-affected individuals, who may require tailored support to navigate applications.

The absence of guaranteed access to legal aid and oral hearings further compounds the issue, making it extremely difficult for vulnerable applicants to advocate for themselves or correct errors in their application. The lack of trauma-informed training for frontline staff remains another critical gap. The NIP mentions training on new systems and materials but does not address the emotional or psychological sensitivity required when working with survivors of violence, children, or individuals with mental health conditions. If left unaddressed, this risks systemic failure to identify and respond to vulnerability, leading to inappropriate placements, wrongful rejections, and human rights breaches.

Integration and Transition Post-Status

Recognition of refugee or subsidiary protection status does not guarantee successful integration. Status holders face difficulties finding housing, enrolling in education, and accessing employment services. Despite eligibility for mainstream social supports, there are no dedicated orientation or case management services for newly recognised refugees. This limits their ability to rebuild their lives and contribute to Irish society. The promise of protection is undermined if it does not translate into meaningful inclusion. Without structured support, newly recognised refugees may remain isolated, underemployed, or homeless.

One refugee who spoke to researchers of Maynooth University discussed his experience of living in Longford, and his attempts to get involved in the community.

“Integration is a two-way relationship. I’m willing to integrate as an asylum seeker, but the community must accept me. I think there’s this lack of awareness within the Irish community in Longford about asylum seekers and refugees in general, so there is not much understanding or awareness... There should be programs that benefit asylum seekers and the community. Asylum seekers have so much potential to give to this country, but there are preconceived assumptions about us.”

Interviewee from research conducted by Maynooth University

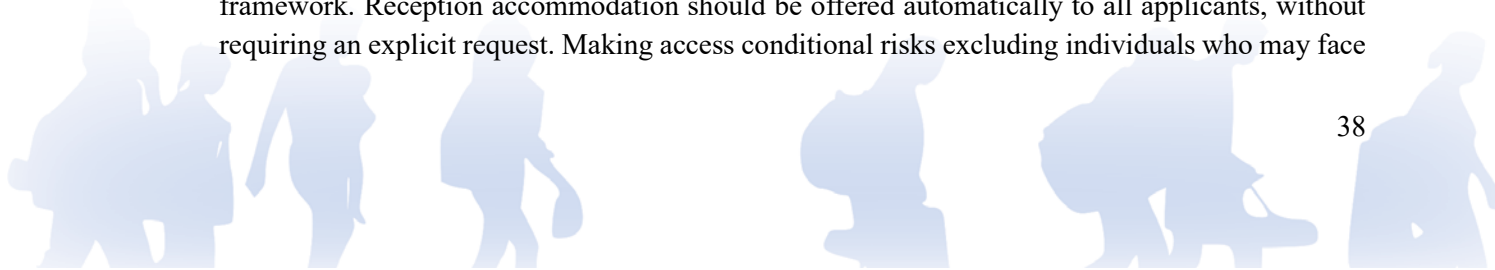
The next section offers policy recommendations designed to address these thematic challenges while promoting a fair, humane, and sustainable asylum system in Ireland.



Policy Recommendations

Ireland's response to those seeking international protection must reflect our national commitment to human rights, dignity, and the rule of law. A truly fair and humane system is one that ensures timely and equitable access to justice, safeguards vulnerable people from harm, and prioritises integration. In light of Ireland's obligations under EU and international law and ahead of the 2026 deadline to implement the EU Pact on Migration and Asylum, we recommend the following reforms, grounded in social justice and the common good.

- *Ensure access to legal support at all stages*
Legal guidance/assistance must be available from the earliest stages, beginning with the initial declaration of intent, through the preliminary interview, questionnaire submission, and all appeals. Without access to qualified legal representation, applicants cannot meaningfully engage with a complex and high-stakes system. This is also a requirement under the Asylum Procedures Regulation. Where applicants are detained, they must be provided with legal guidance/assistance so that they are aware of the reasons for detention and that they understand their rights.
- *Professionalise frontline support through mandatory training and accreditation*
All frontline staff including interpreters, caseworkers, immigration officers, and reception centre personnel should receive mandatory, accredited training in trauma-informed care, vulnerability sensitivity, cultural competence, and gender-responsive practices. These competencies are essential in the international protection context, where many applicants are survivors of violence, persecution, or trafficking. Accreditation and certification should be standardised across departments to ensure quality and accountability. Staff must also be trained to recognise and mitigate personal or cultural bias, as poor-quality interpretation or discriminatory attitudes can seriously compromise applicants' rights. Such training must be embedded in induction and professional development across the protection system to ensure consistent, respectful, and appropriate treatment.
- *Create transparent, accessible case management systems*
Applicants should be able to track their applications, understand what is expected of them, and receive regular case updates. While a centralised digital system is welcome, it must be accompanied by safeguards to prevent digital exclusion, especially for those with limited literacy (including digital literacy), or no access to devices or stable internet. In-person support should be available to assist with completing digital application forms for those who need it, especially for vulnerable individuals. The case management system should also extend beyond the IPO stage to include appeals, ensuring continuous access to information and updates throughout the protection process.
- *Guarantee safe, dignified, and appropriate reception conditions*
Direct Provision centres are often of poor standard, lack privacy, are overcrowded, and provide insufficient nutrition and hygiene, all of which violate basic dignity and wellbeing. Although the government has committed to ending Direct Provision, the NIP now introduces a tiered accommodation system linked to an applicant's procedural category. Under this system, accommodation is provided only when applicants explicitly request it, rather than being granted automatically. This approach risks repeating many of the same shortcomings under a different framework. Reception accommodation should be offered automatically to all applicants, without requiring an explicit request. Making access conditional risks excluding individuals who may face



language barriers or lack access to information. Reception support must also be based on individual need, not procedural category, to ensure fair and equitable treatment. This includes providing adequate, appropriate accommodation and services, particularly for vulnerable individuals, to prevent applicants from being left without shelter or essential support. Screening centres and reception conditions should not impose disproportionate movement restrictions or operate as de facto detention.

- *Ensure equitable access to the labour market*

Labour market permissions should be renewed promptly to prevent employment disruption and income insecurity. To ensure stability and continuity, applicants should also retain the right to work during the appeals stage to avoid prolonged dependency on the state, loss of skills, and social isolation.

Exclusion of those in accelerated or border procedures denies equal opportunity and risks deepening marginalisation. Measures should also support parents through accessible childcare. Finally, proposed movement restrictions should not impede applicants' ability to access or sustain employment.

- *Ensure fair and accessible appeals procedures*

The appeals process must uphold procedural fairness and allow applicants a genuine opportunity to present their case. Applicants should be clearly informed of their rights and the steps available to them following a negative decision. The shortened five-day appeal window places applicants under significant pressure. This timeframe should be extended to at least 10 working days, beginning from the date the applicant actually receives notification of the decision, to ensure adequate time to understand the outcome, obtain translation and legal guidance/assistance, and prepare an appeal.

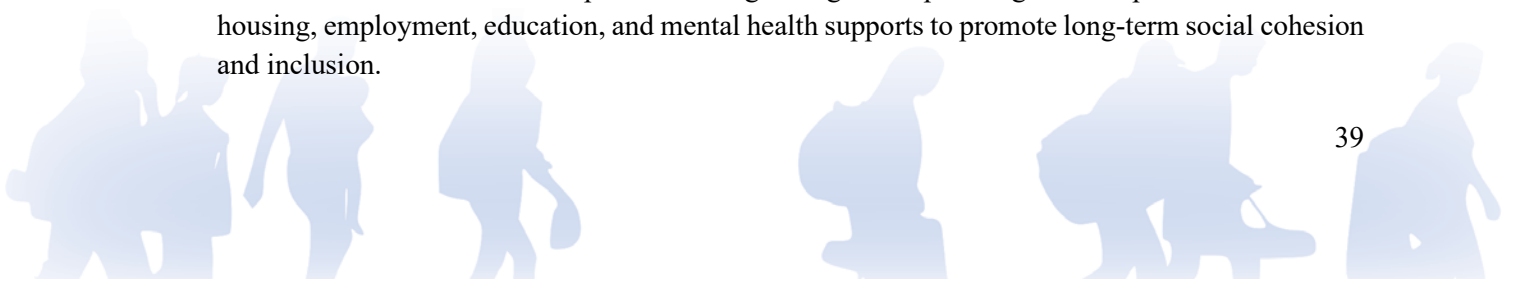
Applicants should also retain the right to an oral hearing where issues of credibility, factual accuracy, or trauma-related evidence arise. Written-only appeals limit their ability to clarify misunderstandings or correct errors. Legal guidance/assistance and translation services must be guaranteed and accessible at all stages of the appeal process to ensure that decisions are based on the merits of the case rather than procedural barriers.

- *Promote interdepartmental coordination and policy coherence*

Responsibility for protection and integration is currently fragmented across departments. A coherent, cross-governmental approach is essential to ensure continuity of support from international protection application to post-status life. The Department of Justice, Home Affairs and Migration must be empowered to coordinate with housing, health, social protection, and education bodies, particularly at the point of transition to the status of 'leave to remain'. Coordination mechanisms should also include civil society and non-governmental organisations that provide frontline support to applicants and facilitate inclusion.

- *Strengthen post-status integration supports*

The current system too often frames integration as a secondary concern or discretionary support. In practice, delays, isolation, and lack of access to essential services undermine inclusion and perpetuate marginalisation. Integration must be repositioned as an issue of social justice, and a structured pathway must be developed to support those granted status in transitioning out of IPAS accommodation and into independent living. Integration planning should prioritise access to housing, employment, education, and mental health supports to promote long-term social cohesion and inclusion.



A fair, efficient, and rights-based asylum system is not only a legal obligation, but also essential for democratic legitimacy, social cohesion, and international credibility. The recommendations presented here aim to balance the integrity of Ireland's borders with the dignity of those seeking protection, aligning national systems with European reforms while centring fundamental rights. Aligning with the EU Pact on Migration and Asylum offers an opportunity, but only if implemented with robust legal safeguards, inclusive policy coordination, and a central commitment to human rights. Effective implementation should also be accompanied by independent monitoring and accountability mechanisms to ensure compliance with EU and international standards.



Conclusion

Ireland stands at a pivotal moment in shaping the future of its international protection system. The country's decision to opt into the EU Pact on Migration and Asylum commits it to substantial legal and operational changes within the next year. This period of transition offers not just obligations, but an opportunity: to build a protection process that is not only procedurally efficient, but firmly rooted in human rights, dignity, and the rule of law.

As this paper has shown, Ireland's current system exhibits critical strengths, legal structures grounded in the *International Protection Act 2015* and access to appeals through the International Protection Appeals Tribunal. However, these strengths are undermined by persistent systemic weaknesses such as long processing delays, inconsistent legal access, substandard accommodation, and a lack of trauma-informed and vulnerability-sensitive care. The challenges are exacerbated by public misinformation, political pressure, and an ongoing housing crisis that pre-dates the increases in applications for protection and has pushed parts of the reception system to collapse.

The *General Scheme of the International Protection Bill 2025* and *National Implementation Plan* reinforce this challenge by shifting to an end-to-end, digital-first process without fully addressing support needs. The system implicitly assumes digital literacy, immediate access to legal advice, and the availability of adequate services. Without deliberate planning, these assumptions risk compounding inequalities, particularly for traumatised applicants and those with limited resources.

Yet, through two rounds of civil society consultation, what emerges here is a consensus: a protection process that is fair, timely, and humane is not only achievable, it is essential. Such a system protects vulnerable individuals, ensures compliance with Ireland's domestic and international obligations, and maintains public confidence in migration governance. In parallel, it is both legitimate and necessary for the State to maintain control over its borders and to implement effective and lawful return procedures for those whose claims are ultimately unsuccessful. These procedures must be humane, and person centred at all times in their operation, recognising that a person who has been denied a leave to remain is not a criminal to be deported, but a person to be properly assisted and treated with dignity as arrangements are made for their exit from the state.

This paper has offered detailed, evidence-based recommendations, ranging from immediate procedural reforms like expanding legal aid and interpreter training to structural changes, such as the development of transition pathways to support successful applicants to integrate. These proposals are grounded in Ireland's current legal context and align with EU Pact obligations.

The path forward requires political will, interdepartmental coordination, and sustainable investment in the institutions and people who make the system work. It also demands that policy decisions be driven not by reactive politics or misinformation, but by law, evidence, and a commitment to treating every person who seeks protection with the dignity they deserve. As implementation of the *EU Migration and Asylum Pact* has begun, Ireland must make deliberate choices. It can merely comply, or it can lead. A fair and rights-based international protection system is not just possible, it is essential to Ireland's values, identity, and international obligations.



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