



empowering people in care

**Submission on the
Draft Revised
Working Protocol
between Tusla and
the Housing Authority**

March 2025

Introduction

EPIC welcomes the opportunity to review this draft revised protocol.

As part of the Irish Coalition to End Youth Homelessness, we have given our input to the Coalition submission. However, we want to draw attention to broader issues that are beyond the scope of the protocol as currently constituted but are relevant to the ambition of preventing homelessness of care experienced young people.

We want to note the significant deterioration of the housing options and accommodation options specifically available for care leavers over the past 10-12 years.

It is EPIC position that in light of the specific duty of care of the State as corporate parent up until the age of 18, care leavers must be prioritised as a specific category of young people in relation to housing needs. A care leavers housing strategy should be put in place to address the housing needs of different categories of need among care leavers, particularly those who are at increased risk of homelessness.

Care leavers should not face the uncertainty of where they will live when they turn 18, or fear of becoming homeless. With careful planning, early flagging of young people who may be at risk of homelessness, and interagency supports, better outcomes for the housing needs of young people leaving care can be achieved. An agreed prioritisation of the allocation of appropriate housing for young care leavers would assist in planning towards the provision of suitable accommodation. This should include a suite of options, having regard to the various categories of need.

Many care leavers are not prepared for living independently at 18 and will require additional supports, including to manage a tenancy and all that this entails. There should be semi-independent or supported accommodation available nationally to care leavers from the age of 18.

High level Cross-Departmental planning must ensure that these young people are identified well in advance of turning 18 and that housing and accommodation needs are addressed with regard to specific vulnerabilities and supports which may be required. This should drive the development of a suite of options, including transitional housing and access pathways to social housing with clear targets and a ring-fenced budget.

What can be achieved by the Protocol

We note that the recently published data from DRHE looking at youth homelessness in the Dublin Region in 2023 found that among 18–19-year-olds, leaving care was the reason for homelessness cited by 20.2%¹. Leaving care was among the top six most commonly reported reasons for homelessness by young males between 18-24 and the fourth most commonly reported reason for females in the same age cohort.²

With the housing crisis, many of the services that were available for young care leavers through direct referral from aftercare services are now under the management of Housing Authorities. Funding for aftercare projects was diverted to provide general homeless services for the 18-24 cohort.

In EPIC's experience this has meant that there is a lack of appropriate transitional accommodation for young care leavers. For example, there are three main youth hostels in the city centre with exceptionally long waiting list for some of the most vulnerable young people in the country. EPIC advocates have supported young care leavers who have found themselves moving from residential care into homelessness, including young people who have been in special care. EPIC have also seen young people return to the family home from which they were removed, once they are over 18, due to a lack of any other accommodation options.

The experience of EPIC advocates directs that a young person's application for social housing support should commence one year, rather than six months, in advance of turning 18. This would address a lot of the anxiety experienced by young people in the year prior to leaving care in relation to their accommodation needs and would also address the significant challenges for aftercare workers if this is properly implemented by the Housing Authorities. This requirement should be consistently implemented across all Housing Authorities nationally.

Not all care leavers require Local Authority accommodation when they become adults, but their living circumstances can change. Thus, even settled foster placements can be precarious, or circumstances can change, which can leave a young person without any support.

In cases where YP are not entitled to Aftercare, they are often more vulnerable and have a higher need for housing supports from Tusla and the Local Authority. The protocol does not address the housing needs of vulnerable young people who may find themselves in care at a later stage but will

¹ : Maphosa, P. & Mayock, P. (2025) Youth Homelessness in the Dublin Region, 2023. Dublin: Dublin Region Homeless Executive, p.33

² *Ibid*, p.31

not meet the eligibility criteria for aftercare as they do not have 12 continuous months in care prior to their 18th birthday. These young people are known to Tusla and many are at risk of homelessness. This can also include unaccompanied minors.

We believe that the protocol can be strengthened to address many of the issues outlined above. Without clarity and strengthening of the protocol to ensure consistency, clear responsibilities and accountability, there is unlikely to be a consistent improvement in processes and outcomes.

Aftercare Steering Committees

Ideally, local Aftercare Interagency Steering Committees (ASCs) should work with Tusla and Housing Authorities to assess the level of housing requirement to avoid homelessness in each coming year.

This information should form a part of the Homeless Action Plan on an annual basis. This high-level information should be shared with the Department of Housing and Department of Children to ensure that initiatives such as CAS for Care leavers and Housing Authorities general allocations are working toward meeting need annually.

In relation to the draft Revised Joint Working Protocol between Tusla and Housing Authorities, we note that the joint protocol assumes uniformity of practice and procedures of the ASCs. However, EPIC advocates make the following observations, based on their work with young care leavers.

ASCs are not managed consistently. Many face challenges without consistent Housing Authority representative in attendance. Some HAs have housing stock for single occupants, and others do not, again leading to an inequitable service nationally. Some Tusla ASC meetings are held quarterly, while others facilitate emergency ASC meetings for individual young people.

Some Housing Authorities (HAs) have a designated representative who oversees all housing applications for young people leaving care, and some are open to completing these assessments before the young person's 18th birthday, with the application ready to go live on their 18th birthday. In other HAs, there is no designated person to manage these applications effectively.

This lack of consistency results in a post code lottery as to how housing needs for care leavers is addressed nationally. This leaves many young people in precarious and unsafe environments as they await their assessment approval. Relying on data supplied through the ASCs alone may not be an effective way of measuring the changing housing needs of the most vulnerable care leavers.

Recommendations

An agreed prioritisation of the allocation of appropriate housing for young care leavers is required. This will assist in planning towards the provision of suitable accommodation, including the access pathways to transitional housing.

1. To ensure a greater inter-agency collaboration, a more consistent and standardised approach across housing authorities is required to ensure effective planning for the allocation of housing for care leavers.
2. Given the variation in ASC processes and HA allocations, the protocol should set out mandated mechanisms and procedures, rather than suggested ways of working, to ensure greater consistency in the application of Housing Authorities' Allocation Schemes for young people leaving care. Roles and responsibilities of agencies who are members of Steering Committees must be clearly defined.
3. Tusla should be required to send detailed and accurate information in relation to young people leaving care for whom no accommodation has been identified and are therefore at-risk of homelessness.
4. It should be a requirement that a young person's application for social housing is commenced one year in advance of turning 18. This requirement should be consistently implemented across all Housing Authorities nationally.
5. Priority applications (such as Exceptional Social Grounds in Dublin City Council) should be available for all young people with care experience who require safe and secure housing or are facing homelessness. A prioritisation system of this kind should be implemented as a formal and consistent mechanism in every local authority.
6. Each Local Authority should have a designated representative who oversees all housing applications for young people leaving care. This representative should be mandated to attend local interagency steering committees to ensure collaboration plan for the provision of adequate housing for care leavers at risk of homelessness.

7. Provision for data in relation to unaccompanied minors entering the country should be provided to the local authorities. This must then lead to planning and provision of adequate accommodation that takes account of their vulnerabilities when these young people turn 18.
8. To ensure continuum of care, all Local Authorities should provide semi-independent housing which would cater for young people needing support and which they can access even when moved from one county to another.
9. In line with good practice the protocol should include a mechanism to strengthen the voice of the young person and encourage their active participation in the process, including a forum to raise concerns where the protocol is not being applied in practice.
10. The Protocol should not be limited to young people who meet the statutory criteria for aftercare and should include young people who have care experience but are outside of the statutory threshold for statutory aftercare eligibility. Young people who have entered care in the year before turning 18 or are accommodated under section 5 of the Child Care Act 1991, including unaccompanied minors, should not be excluded from the application of this protocol.
11. The application of this protocol should be regularly reviewed, and the findings published, to ensure transparency and accountability.



7 Red Cow Lane, Smithfield, Dublin 7
Co Reg no: 381973
Reg Charity no: 20055080
Chairperson: Maeve Doyle

www.epiconline.ie
info@epiconline.ie
01 8727661

 **[@epicireland.ie](https://twitter.com/epicireland)**
 **[@epicempoweringpeopleincare](https://www.instagram.com/epicempoweringpeopleincare)**
 **[@epicireland](https://www.facebook.com/epicireland)**
 **[EPIC - Empowering People in Care](https://www.youtube.com/EPIC-EmpoweringPeopleInCare)**
 **[@epicempoweringpeopleincare](https://www.linkedin.com/company/epicempoweringpeopleincare)**



empowering people in care