

Focus Ireland Submission to National Policy Framework on Alternative Care

December 2025

Focus Ireland welcomes the opportunity to contribute to the upcoming National Policy Framework on Alternative Care. We support children and young people under 18, as well as care-experienced young adults aged 18–26, who are experiencing or at risk of homelessness. Our [research](#) and service provision indicate a strong link between leaving State care and youth homelessness. This is reinforced by a recent [DRHE report](#) analysing 2023 youth homelessness data in Dublin, which found that among 18–24-year-olds, leaving State care was the fifth most frequently cited reason for entering emergency accommodation. For 18–19-year-olds entering homelessness for the first time, family breakdown and leaving State care emerged as the primary pathways.

It is important to note that when accessing emergency accommodation, only one reason for entry is required. As a result, a young person with a care background may not list it as their immediate cause of homelessness. Therefore, it is likely that the number of young people experiencing homelessness who have a care background is significantly higher than the research suggests.

In this submission, we highlight the importance of a continuum of care for children and young people in care and after they leave the care system, to ensure that when they transition to adulthood, they do not enter homelessness. We also emphasise the critical role of early intervention and prevention, ensuring that young people are supported and that families receive the assistance they need so that children are not unnecessarily placed in care.

This submission focuses on four key topics that Focus Ireland believe should be instrumental in the National Policy Framework on Alternative Care: **Early Intervention and Prevention, Residential Care, Aftercare, and Unaccompanied minors.**

We remain open to ongoing communication and collaboration with the Department of Children, Disability and Equality, to ensure that the experiences of the children and young people we work with are accurately represented and effectively addressed.

Early Intervention and Prevention

Early intervention and prevention are essential to ensure that children and young people do not need to enter State care. This approach focuses on identifying and supporting families who may experience challenges such as conflict, financial strain, or housing insecurity and homelessness, and providing the right help before difficulties escalate into crisis. This section highlights two key services that support young people and their families: Youth Family Mediation and Upstream. Focus Ireland recommends that both services be included in an Early Intervention and Prevention section of the National Policy Framework on Alternative Care. Incorporating these supports would not only reduce the number of young people entering State care but would also contribute to reducing their risk of homelessness.

Youth Family Mediation

Family breakdown is a leading driver of youth homelessness. The DRHE report analysing 2023 youth homelessness data in Dublin found that relationship breakdown with a parent accounted for 27.8% of youth homelessness cases, rising to 36.5% when broader family conflict was included. [The National Youth Homelessness Strategy \(2023–2025\)](#) recognises prevention as essential and commits to enhancing supports for families experiencing conflict or breakdown. Youth Family Mediation offers one of the most direct and effective mechanisms for delivering on this commitment.

Focus Ireland's Youth Family Mediation Service, established in 2016 and supported by Tusla since 2018, provides early intervention for young people aged 12–18 and their families. The service works to prevent crises from escalating into homelessness or entry to State care, particularly when a young person is asked to leave the family home, threatens to leave following conflict, or when a placement outside the home is at risk. Delivered mainly in the family home, mediation offers a flexible, non-threatening form of support that focuses on solutions rather than blame.

Using a confidential, voluntary facilitative model, trained mediators help young people and their parents or carers communicate openly, understand each other's perspectives, and develop mutually acceptable solutions. Mediators do not take sides - they help families identify the issues driving conflict and explore practical options to resolve them. This approach strengthens communication and conflict-resolution skills, supports family stability, and increases resilience. Young people who can remain safely at home have a significantly better chance of making a stable transition to adulthood.

In 2023, Focus Ireland expanded the service by adding two mediator roles to respond to growing referrals from youth and community services, though demand remains high. An [evaluation](#) of the service, commissioned by Focus Ireland and published in April 2025, demonstrated its effective impact. Between 2016 and late 2024, the service supported 148 young people and their families across Dublin, Kildare, and Wicklow, most aged 15 to 17. Mediation prevented youth homelessness and care entry, stabilised placements, repaired family relationships, and improved overall family functioning. Positive outcomes were also reported in education, with some young people remaining in school and others successfully transitioning to alternative education or training.

The evaluation highlighted the service's cost-effectiveness, noting that the annual cost of a Focus Ireland mediator (€81,000) is far lower than the average annual cost of a child in residential care (€322,921.60). Youth Family Mediation is an evidence-based early intervention model that reduces pressure on emergency accommodation, the care system, and other statutory services. To prevent youth homelessness at scale, the evaluation recommends a significant national expansion of the service. Greater investment would allow more families to benefit from this proven intervention, helping young people remain safely at home and avoid care entry.

In addition to the evaluation, Focus Ireland has actively promoted the expansion of Youth Family Mediation as an effective support for young people. This has included presentations at the Department of Housing, Local Government and Heritage's Youth Homelessness and Prevention Measures Workshop and to the Early Intervention and Prevention subgroup implementing the National Youth Homelessness Strategy (2023–2025). Focus Ireland remains open to further

collaboration and information sharing to ensure the service is expanded and embedded in early intervention and prevention policy.

Upstream

The Youth Family Mediation evaluation also recommends that, if the service is scaled up, a version of Upstream Ireland should be developed. Upstream is a school-based early-intervention model that works with schools to establish a data-driven process for identifying young people at risk of homelessness. All students complete an online wellbeing survey designed to flag early indicators such as family breakdown, school disengagement, or mental health challenges. Survey data is then analysed to identify students who may require additional support. Those identified are offered early, tailored interventions through education, family support, and community services, preventing issues from escalating into homelessness or crisis.

Focus Ireland recognises Upstream as an effective model of early intervention and prevention and sees it as a programme which would strengthen the Youth Family Mediation Service, particularly in addressing issues such as family breakdown. Focus Ireland has also developed a strong relationship with [Upstream Cymru](#), which has successfully implemented the model in Wales. Upstream Cymru currently operates across 11 schools, reaching 11,716 pupils. Between 2022 and 2023, surveys identified 149 pupils at risk of homelessness in Wales, with 107 families receiving support. Notably, 65% of these pupils were not previously known to support agencies.

A recently published [evaluation examined the Rock Trust's pilot of Upstream](#), launched in 2023 across six secondary schools in three Scottish local authorities. Similarly to Upstream Cymru, the pilot was successful in identifying young people at risk of homelessness, including many who were not previously known to services. The evaluation also notes challenges such as survey design and implementing full family support, and details how Rock Trust liaised with schools and local authorities to ensure compliance with GDPR regulations.

Both Upstream Cymru and the Rock Trust pilot offer valuable guidance for implementing the model in Irish schools. Focus Ireland recommends engaging with organisations that have successfully delivered the model to identify and address potential challenges and obstacles.

The Youth Family Mediation evaluation further recommends that government and state agencies invest in integrated data initiatives, combining information from homelessness services, population statistics, education data, and other sources. Such initiatives would help identify the schools and communities where Upstream should be introduced. Implementing this approach will require collaboration between the Department of Children, Disability and Equality, the Department of Education and Youth, the Department of Housing, Local Government and Heritage, and local authorities to ensure both accurate data collection and the effective rollout of Upstream.

Family breakdown drives youth homelessness, making early intervention essential. Focus Ireland recommends that both Youth Family Mediation and Upstream be included as key components of the Early Intervention and Prevention section of the upcoming National Policy Framework on Alternative Care. Together, these evidence-based models provide complementary approaches: Youth Family Mediation directly supports families experiencing conflict, while Upstream identifies young people at risk and delivers tailored interventions before crises occur. Embedding

both in national policy would strengthen support for vulnerable young people, promote family stability, and help ensure safer transitions to adulthood.

Our recommendations:

- Include Youth Family Mediation and Upstream in the Early Intervention and Prevention section of the National Policy Framework on Alternative Care.
- Expand Youth Family Mediation nationally to meet growing demand and ensure early intervention reaches more families.
- Collaborate with the Department of Housing, Local Government and Heritage, the Department of Education and Youth, and local authorities to develop an Irish version of the Upstream model, providing early support for at-risk young people.
- Invest in integrated data systems to enable targeted early intervention. This should combine official homelessness data (Department of Housing, Local Government and Heritage and Dublin Region Homeless Executive), small-area population statistics and the Pobal HP Deprivation Index (Central Statistics Office), education data (Department of Education and Youth), and other relevant sources.
- Engage with organisations experienced in implementing Upstream to identify and address potential challenges and obstacles.

Residential Care

Pathways into homelessness often begin in childhood or adolescence, making it vital that under-18s who cannot live at home have access to specialist residential care. The purpose of residential care is to provide a safe and supportive environment where young people can heal, develop essential life skills, and confidently transition into adulthood. Several issues relating to the provision of residential care must therefore be addressed in the National Policy Framework on Alternative Care.

Focus Ireland provides a range of residential care services for young people under 18, all funded by Tusla. These include:

- **Dalkey and Templeogue**, which provide medium to long term placements for 13- to 17-year-olds
- **The Haven in Clonmel, Co. Tipperary**, which offers supported accommodation for unaccompanied minors seeking international protection
- **Caretakers Project**, which provides emergency placements for 16- to 17-year-olds through the National Emergency Out-of-Hours Service as part of Tusla's Crisis Intervention Services

- **Grange Lodge**, which offers short term accommodation for 15- to 17-year-olds within Tusla's Crisis Intervention Services

Through this work, we recognise that residential care must be trauma-informed, appropriately staffed, and centred on the needs of each child.

Ireland is currently facing a critical shortage of both mainstream and specialised residential care placements, resulting in significant pressure across the care system. [Tusla's Strategic Plan for Residential Care \(2022–2025\)](#) acknowledges these challenges and commits to reducing the disproportionate reliance on private residential provision by expanding public and voluntary sector capacity. However, as the strategy nears its conclusion, these capacity issues remain unresolved.

This has resulted in continued reliance on Special Emergency Arrangements (SEAs). These placements are often unsuitable for the vulnerable children assigned to them, and they are extremely costly. SEAs increase the risk of further instability and compromise the standard of care that every child has a right to receive, while also threatening the long-term sustainability of essential Tusla services.

HIQA's 2024 report, [Ten Years of Regulating and Monitoring Children's Social Care Services 2014 to 2024](#), highlights these ongoing challenges with capacity. The report also points to persistent staffing pressures in residential services, rising demand, and an increase in the number of children who require higher levels of specialist support.

To address these issues, the residential care system requires a comprehensive set of reforms focused on sustainable funding, increased capacity, workforce development, and strong quality assurance measures that ensure safe, regulated, and therapeutic environments for all children who require residential care. The National Policy Framework on Alternative Care must therefore acknowledge the central role of residential care within the continuum of alternative care and prioritise reversing the chronic underinvestment that has contributed to the current crisis.

Our Recommendations:

- Ensure that issues with residential care are addressed in the National Policy Framework on Alternative Care
- Ensure all Special Emergency Arrangements are fully regulated and inspected by HIQA, time-limited, and phased out as safe, therapeutic placements become available.
- Expand State and voluntary residential care capacity to reduce reliance on private, for-profit providers and ensure consistent, child-centred care.
- Provide capital funding to voluntary providers to enable the creation of additional residential beds and facilities.
- Increase core funding and introduce multi-annual budgets for voluntary residential services to ensure stability and long-term planning.
- Implement targeted workforce strategies, including competitive pay, career progression pathways, and staff wellbeing supports, to recruit and retain skilled residential care staff.

Aftercare

Planning and resourcing aftercare plays an important role in helping vulnerable young people avoid homelessness and establish independent lives. As outlined above, there is a persistent link between leaving care and entering homelessness. Although there is a strong understanding of the vital role aftercare plays in providing a continuum of support as young people move into adulthood, many still face significant barriers when trying to access it. The National Policy Framework on Alternative Care must address these barriers to ensure that all young people leaving state care have access to suitable aftercare supports and do not enter homelessness.

Focus Ireland provides tailored aftercare services, including residential aftercare, to care leavers across Ireland. These supports help young people develop essential independent living skills and secure stable housing. Through our work with these young people, we see firsthand how important this support is for their development and how essential it is that every young person who needs aftercare can receive it.

[*Tusla's Strategic Plan for Aftercare Services for Young People and Young Adults 2023–2026*](#) identifies several key issues in Ireland's aftercare system, particularly regarding entitlement to aftercare, access to accommodation, and the availability of wraparound supports.

The availability of appropriate housing options is central to our work with care leavers. The current housing crisis has significantly increased the risk of homelessness among this group, and no young person leaving care should ever have to enter homeless services. Tusla's Strategic Plan highlights the need for cross-departmental collaboration with the Department of Housing, Local Government and Heritage to secure dedicated accommodation and alternative housing options for young people with care experience. The revised [*Protocol on Young People Leaving State Care*](#), published earlier this year as part of the National Youth Homelessness Strategy (2023-2025), introduces some welcome improvements, particularly in relation to aftercare planning and communication between Tusla and Local Authorities. However, without guaranteed access to accommodation, these changes cannot effectively prevent young care leavers from becoming homeless. It is vital that care leavers are prioritised for social housing to prevent careleavers entering homeless services as soon as they turn 18. Achieving this will require meaningful collaboration between Tusla, the Department of Children, Disability and Equality, the Department of Housing, Local Government and Heritage, and Local Authorities to ensure a coordinated and consistent approach nationwide.

In addition to secure housing, wraparound supports are essential for young people leaving care as they transition into adulthood. In its Strategic Plan for Aftercare, Tusla states that the aim of aftercare is to provide a range and continuum of services that support young people with a care background to achieve a successful transition from their placement to independent adult life in the community. These wraparound supports include personalised support, emotional support, independent living skills, access to education and training, as well as financial assistance and budgeting guidance.

An example of this type of provision is the [*Supported Housing for Youth*](#) (SHY) pilot, which Focus Ireland is delivering in partnership with Clúid Housing as part of the National Youth Homelessness Strategy (2023-2025). SHY is a successful transitional housing model, based on Housing First for Youth principles, for young people aged 18–24. While not exclusively for care

leavers, it demonstrates how collaboration between service providers, Approved Housing Bodies, and Local Authorities can help prevent youth homelessness by ring-fencing housing allocations for young people and providing transitional accommodation alongside individualised, tailored supports. This approach to accommodating young people should be an intrinsic part of aftercare provision.

Focus Ireland's services addressing youth homelessness typically support young people aged 18-26. This aligns with [FEANTSA's definition](#) of youth as up to 26 years of age. In an Irish context, youth homelessness is currently defined as affecting those aged 18-24. At present, aftercare is only available to young people aged 18-21 (or up to 23 if they remain in education or training), which does not accurately reflect the full period during which young people navigate the sensitive transition to adulthood.

Additionally, making aftercare eligibility dependent on attending education or training further marginalises care leavers. Many young people with a care background may experience disruptions in education or training due to life events or personal circumstances, and some are young parents who struggle to balance parenthood with education. For these reasons, aftercare support should be extended to at least age 25 for all care leavers, with flexibility to accommodate those with complex needs.

In order to provide a fair and equal start to young people with care backgrounds, all young people leaving state care should be entitled to aftercare supports. Currently, under Section 45 of the Child Care Act 1991, the Child Care Amendment Act 2015, and Tusla's National Aftercare Policy (2017), young people must have been in care for at least 12 months before turning 18 to qualify for aftercare supports. This places many young care leavers at a disadvantage and increases their risk of homelessness. It is therefore vital that all policy surrounding access to aftercare is reviewed to ensure that all young people with a care background are provided with aftercare supports, regardless of the time they have spent in care.

A strong aftercare system is essential to supporting young people as they transition from care to adulthood. The National Policy Framework on Alternative Care provides a vital opportunity to ensure that all young people leaving state care receive the appropriate aftercare supports. Embedding these supports within the framework is crucial to addressing the recurring pathway from leaving state care into homelessness.

Our Recommendations:

- Include aftercare as a central component in the National Policy Framework on Alternative Care, with clear guidance on eligibility, entitlements, and the range of supports available.
- Review the Child Care Act 1991, the Child Care Amendment Act 2015, and Tusla's National Aftercare Policy (2017) to ensure that all care leavers, regardless of time in care, are entitled to aftercare supports.
- Extend aftercare provision to at least age 25, with flexibility for young people with complex needs, and decouple eligibility from education or training requirements.

- Ensure that young people leaving state care are prioritised in social housing acquisitions in each local authority. This involves collaboration between the Department of Children, Disability and Equality, the Department of Housing, Local Government and Heritage, Tusla and local authorities.
- Guarantee access to stable housing and housing-focused supports for all care leavers, including collaboration with Local Authorities, Approved Housing Bodies, and other relevant departments to prevent homelessness to create supportive, transitional housing options for care leavers.

Unaccompanied minors

While the challenges outlined above affect all young people leaving state care, unaccompanied minors face additional, layered vulnerabilities. Their experiences are shaped not only by gaps in the aftercare system but also by the pressures of migration, trauma, legal uncertainty, and the absence of family support. These combined factors increase the risk of homelessness even further, making it essential that the National Policy Framework on Alternative Care explicitly addresses their distinct needs.

In 2023, Focus Ireland, in partnership with Tusla, opened *The Haven* in Clonmel to provide supported accommodation for unaccompanied minors seeking international protection. As with all Focus Ireland services, ensuring appropriate move-on pathways and preventing homelessness is central. However, current aftercare policy places these young people at a significant disadvantage.

As highlighted in the previous section, in Ireland young people must have been in care for at least 12 months before turning 18 to qualify for aftercare supports. While this presents challenges for many care leavers, it is especially problematic for unaccompanied minors, who often arrive in Ireland at age 16 or 17 and cannot meet this threshold.

A further complication arises from Tusla's use of Section 5 of the Child Care Act 1991, which allows the Agency to provide emergency accommodation without taking a child into statutory care. Although Tusla may initially use a 28-day voluntary care period under Section 4 so that this time counts toward aftercare eligibility, many young people still fall short of the required 12 months. Even those who meet the 12-month threshold may lose entitlement if they remain in the international protection process after turning 18, as Tusla does not provide accommodation or financial support to young adults still awaiting their immigration status.

These gaps have been [criticised by the Ombudsman for Children's Office \(OCO\)](#), which has raised concerns about the inappropriate use of Section 5 for unaccompanied minors. The OCO highlights that children accommodated under Section 5 are not entitled to an allocated social worker and are also excluded from aftercare supports. [The OCO has stated that every separated child should have access to aftercare by virtue of being a unaccompanied minor, regardless of age, time in care, or immigration status.](#)

Research published by EPIC in October 2025, [“Be Strong – there’s so many problems waiting.”](#) highlights the experiences of unaccompanied minors who are not entitled to aftercare supports. For unaccompanied minors without aftercare entitlements, turning 18 is often marked by anxiety

and abrupt instability, with many moved directly from foster or residential placements into adult International Protection Accommodation Services (IPAS). IPAS accommodation is not an appropriate setting for a young person, particularly when they must navigate it alone. Such transitions frequently sever the relationships and stability these young people have built with carers, social care staff, schools, and local communities. Some are relocated to IPAS centres in different counties even while preparing for major exams such as the Leaving Certificate and may experience further moves depending on their immigration status. This forced displacement increases the risk of homelessness, disengagement from education, trauma, and social isolation.

Even those who qualify for aftercare may face inconsistent planning and limited support. Although aftercare planning is intended to begin at age 16, many unaccompanied minors do not receive structured preparation for adulthood, clear information about their options, or certainty about where they will live after turning 18. These gaps arise at a time when young people are navigating trauma, cultural adjustment, complex immigration procedures, and the absence of family support.

The DRHE data from 2023 also shows an increase in young people from migrant backgrounds accessing emergency accommodation. It is therefore vital that early intervention and prevention support, particularly aftercare, are provided to unaccompanied minors to ensure they do not enter homelessness.

Focus Ireland recommends that the National Policy Framework on Alternative Care explicitly include unaccompanied minors and guarantee comprehensive aftercare planning and supports before a young person turns 18, regardless of their immigration status or time in care. Ensuring that all unaccompanied minors receive aftercare is essential to safeguarding their housing, wellbeing, and successful transition to adulthood.

Our recommendations:

- Include the experiences and needs of unaccompanied minors in the National Policy Framework on Alternative Care.
- Apply all aftercare entitlements recommended in the previous section to unaccompanied minors, ensuring access to aftercare regardless of age at arrival, time spent in care, or immigration status, in line with the Ombudsman for Children's guidance.
- Ensure that unaccompanied minors who are entitled to aftercare receive full support, with planning starting at age 16 as outlined in the Protocol on Young People Leaving State Care.
- Strengthen cross-departmental collaboration, including the Department of Housing, Local Government and Heritage, the Department of Justice, Home Affairs and Migration, Tusla, the Department of Children, Disability and Equality, local authorities, and education services, to ensure coordinated supports for unaccompanied minors. This includes careful consideration of accommodation placement to avoid isolation from education, community, and peer networks.

Conclusion

The National Policy Framework on Alternative Care presents a vital opportunity to address the persistent link between young people leaving state care and entering homelessness. Achieving this requires a continuum of care that begins as soon as a child is identified as vulnerable and in need of support. Early intervention and prevention are central to this approach, helping young people and their families navigate challenges such as family breakdown and economic insecurity. Focus Ireland believes that expanding Youth Family Mediation services and piloting the Upstream model in Irish schools offers an effective way to deliver this support. We are ready to share our expertise in mediation and connect the Department and relevant stakeholders with our contacts in Upstream Cymru and the Rock Trust to inform implementation.

Providing a safe and secure environment for children and young people who cannot live at home through residential care is a crucial part of this continuum. All residential placements must be trauma-informed and equipped to deliver specialist support tailored to each child's needs. Expanding public provision of residential care is essential to increase capacity and reduce reliance on Special Emergency Arrangements, which are often unsuitable for vulnerable children. These reforms must be accompanied by investment in staff support and wellbeing to promote retention and ensure the delivery of high-quality, consistent care for all children and young people.

Finally, aftercare is a vital part of supporting young people as they transition from state care to adulthood. It should be available to all care leavers, including unaccompanied minors, who face heightened vulnerabilities. Comprehensive aftercare helps prevent care leavers from entering homelessness by providing stable accommodation with wraparound supports specifically ring-fenced for their needs. These supports should be available until at least age 25, with flexibility to extend depending on individual circumstances.

By embedding early intervention, high-quality residential care, and inclusive aftercare into the National Policy Framework on Alternative Care, Ireland can ensure that all young people have the support they need to live securely, build stability, and successfully transition into independent adult life.