

General Election 2024

Nasc Manifesto

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Nasc
Migrant & Refugee Rights

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1. About Nasc

Nasc, the Migrant and Refugee Rights Centre is a nongovernmental organisation based in Cork City, Ireland. Nasc, the Irish word for 'link', empowers migrants to realise and fulfil their rights. Nasc works with migrants and refugees to advocate and lead for change within Ireland's immigration and protection systems, to an inclusive and equal Ireland that realises the rights of all migrants and refugees.

Since Nasc's doors first opened in May 2000, tens of thousands of people have sought our help and support to navigate complex immigration and asylum processes in Ireland. This manifesto is directly informed by this work, and details some of the main issues we see as imperative to the fulfillment of rights for migrant, asylum seeking and ethnic minority communities in Ireland.

2. Access to Housing and Accommodation

Nasc, together with civil society partners across Ireland, have long raised their concerns at the impact of the housing crisis on migrant and refugee populations. This is most visible for international protection applicants who have been left without accommodation and are living in tents or on the streets. The national housing shortage also impacts the wider migrant and refugee population. Recent figures from the Economic and Social Research Institute show that approximately 22%¹ of those living in direct provision centres have a secure immigration status and should be availing of accommodation in the community however, the lack of housing means they are unable to transition onwards. Our services interact daily with vulnerable migrant families who have been left homeless or cannot find affordable housing.

2.1 Accommodation for international protection applicants

Over 30,000 people are currently accommodated in IPAS and emergency accommodation centres. These centres are predominantly privately owned and operated, and standards vary significantly. Only 'permanent' direct provision centres are subject to the National Standards and inspected by HIQA.

As of October 2024, 2,814 international protection applicants are reported as being homeless.² In a case taken by IHREC, the High Court found that the State was leaving homeless international protection applicants "in a deeply vulnerable and frightening position that undermines their human dignity" and was in breach of its legal obligations.³

¹ Economic and Social Research Institute, 10 June 2024. Available at: <https://www.esri.ie/publications/access-to-autonomous-housing-for-beneficiaries-of-international-protection-in-ireland>

² Department of Children, Equality, Disability, Integration and Youth. Statistics on International Protection Applicants not offered accommodation. 22nd October 2024. Available at: <https://www.gov.ie/en/publication/ec5f2-statistics-on-international-protection-applicants-not-offered-accommodation/>

³ The Irish Human Rights and Equality Commission v. The Minister for Children, Equality, Disability, Integration and Youth, Ireland and the Attorney General [2024] IEHC 493. Available at: https://www.courts.ie/acc/alfresco/173c9396-0529-4a34-9281-fd4441e5c1e6/2024_IEHC_493.pdf/pdf#view=fitH

Recommendations:

1. End homelessness for international protection applicants.
2. Extend HIQA's remit to inspect all State-run accommodation centres.
3. End reliance on the private sector by investing in State-owned accommodation centres. These should be modelled on the standards outlined in the White Paper on Ending Direct Provision and should include on-site integration supports.
4. Significantly increase resources targeting those who have status and are living in direct provision centres to assist them with finding independent accommodation.

2.2 Accommodation supports for beneficiaries of temporary protection (BoTPs)

In March 2024, the accommodation policy for newly arriving BoTPs was changed to provide for only 90 days at a Designated Accommodation Centre (DAC). BoTPs residing in DACs would no longer have access to full social welfare payments and would instead have only an allowance equivalent to the weekly payment made to international protection applicants of €38.80. This policy regarding reduced payments was extended to all Ukrainians in catered accommodation from September 2024. We have grave concerns that the 90-day stay limit in DACs will result in significant hardship for BoTPs who are unable to find accommodation after this period and may become vulnerable to exploitation or abuse in their search for housing.

The reduced support is extremely challenging for many Ukrainians in Ireland. Their ability to find independent accommodation has already been stymied by their lack of access to Housing Assistance Payments (HAP). The lack of access to social welfare payments reduces their ability to pay for a deposit or to save for rental costs while waiting for HAP to begin.

We are also concerned that a clear commitment has not yet been made regarding the renewal of the Accommodation Recognition Payment (ARP) post March 2025. The Accommodation Recognition Payment is available to private individuals who are providing accommodation to a person or people who arrived in Ireland under the EU Temporary Protection Directive since March 2022. This has mitigated some of the impact of lack of private rented housing available to Ukrainians fleeing the conflict in Ukraine. We understand that there are now approximately 21,753 beneficiaries of temporary protection in 'pledged or offer a home' accommodation⁴ and we are concerned that the discontinuation of this payment would lead to a significant loss of accommodation.

Recommendations:

1. Remove the 90-day stay policy for newly arriving BoTPs. It is not feasible that vulnerable BoTPs or those with additional needs will be able to find independent accommodation within the 90-

⁴ Department of Children, Equality, Disability, Integration and Youth. 22nd October 2024. Accommodation of Beneficiaries of Temporary Protection (BOTPs) Weekly Statistics. Available at: <https://www.gov.ie/pdf/?file=https://assets.gov.ie/309634/c5f412b6-0ef2-42f0-bae9-f8ff982d824a.pdf#page=null>

day period.

2. Renew the Accommodation Recognition Payment until March 2026.

2.3 Adequately resource housing in the community

There is an unprecedented housing crisis in Ireland. Our service sees the first-hand impact of homelessness, eviction and housing instability on our service users, who are impacted by the lack of suitable emergency accommodation and social housing. In 2023 the Government missed its target for social and affordable builds by 2,680 homes. Households, including migrant families, who rely on the Housing Assistance Payment are unable to meet increasing rental costs. Additionally, delays in processing HAP applications place significant financial pressure on families who must cover initial rental costs without support, sometimes for months.

Recommendations:

1. Increase investment in building and renovating social housing. Social housing should also take into consideration the need to provide homes for large families and multi-generational family living.
2. Adequately resource Housing Departments to efficiently process HAP applications.
3. Introduce an interim emergency payment, such as Supplementary Welfare Allowance, to assist with rent until the HAP application is fully processed.

3. International Protection and Temporary Protection

3.1 Protect the right to seek asylum

The Irish State must uphold the right to seek asylum - a right enshrined in international law and deeply rooted in our nation's history of migration and empathy for those fleeing hardship. Asylum seekers arriving without passports or valid documentation should not be penalised; they are often escaping dire situations where such documentation is difficult, if not impossible, to obtain.

We are deeply concerned about the designation of certain countries as “safe”⁵. A safe country designation means that a particular country is deemed to generally and consistently have no persecution, torture, inhuman or degrading treatment, and no threat by reason of indiscriminate violence. This policy does not reflect the complex realities within these countries, where specific regions or groups still face persecution, violence, or systemic discrimination. By fast-tracking applications from individuals originating from so-called safe countries, we risk denying protection to those who genuinely need it.

⁵ Since November 2022, Ireland has designated the following as ‘safe countries’ for the purpose of International Protection applications: Albania, Algeria, Bosnia and Herzegovina, Botswana, Brazil, Egypt, Georgia, India, Kosovo, Malawi, Morocco, Montenegro, North Macedonia, Serbia, South Africa.

In light of Ireland's opt-in to the EU Asylum and Migration Pact,⁶ we are alarmed by the proposed border procedure within the EU Migration Pact, which risks introducing de facto detention practices in Ireland. These measures, framed as necessary for streamlined processing, could effectively confine vulnerable individuals (including children and families) in restrictive facilities for extended periods. This would represent a significant shift in practice in Ireland, where immigration-related detention remains rare.

Recommendations:

1. Re-evaluate the process for designation of safe countries, ensuring designations are made based on objective and up-to-date information.
2. Uphold the principle that no one should be denied protection, or be penalised, due to documentation barriers.
3. Actively oppose the establishment of de facto detention facilities as part of the EU Migration Pact's border procedure. Explore alternatives that respect Ireland's tradition of limited immigration detention.

3.2 Provide access to early legal advice for International Protection Applicants

Early legal advice for those arriving in Ireland is essential in order to facilitate their full understanding of the documents and processes involved in their asylum application, and to ensure that protection claims are fully articulated. Changes to procedures at the International Protection Office (IPO), in particular the requirement that applicants complete their questionnaire (IPO2) in English on arrival, are deeply concerning. The questionnaire is a crucial document which forms the main basis for IP applications and remains on the applicant's file throughout the process. While cultural mediators and interpreters are onsite at the IPO to assist applicants in completing questionnaires, this is not a substitute for legal advice prior to the completion of questionnaires.

It is also concerning that accelerated procedures may mean that applicants from deemed safe countries may not have access to legal advice and assistance prior to their substantive interview. Accelerated procedures such as this risk being unfair and contrary to natural justice.

We are concerned that the EU Migration Pact, specifically the Asylum Procedure Regulation, protects only a right to legal counselling at the administrative stage of the asylum procedure. We strongly believe that this is insufficient to ensure that international protection applicants fully understand and are prepared to fully present their case for international protection and will lead to poor first instance applications and, a high number of appeals.

Recommendations:

1. Ensure that the Legal Aid Board (LAB) is sufficiently staffed and resourced to support the number of people seeking international protection in the State.
2. Resource the LAB to ensure that it can deal with applicants who are subject to accelerated procedures, given the tight timeframes involved.

⁶ Government of Ireland. "Public Consultation to inform a national strategy for migrant integration". 20 October 2023. Available at: <https://www.gov.ie/en/press-release/4cae7-minister-mcentee-secures-approval-from-government-to-opt-in-to-measures-of-the-eu-pact-on-migration-and-asylum/>

3. Resource the LAB to have a presence onsite at the IPO to provide legal advice to applicants prior to the completion of their questionnaires. At an absolute minimum, there should be provision for early legal advice onsite for vulnerable applicants.

3.3 Provide residency pathway for beneficiaries of temporary protection (BoTPs)

In June 2024 the European Council announced its decision to extend Temporary Protection until 2026 however details of Ireland's plan to provide for BoTPs from March 2025 onwards have yet to be announced. This has created uncertainty for beneficiaries of temporary protection as well as their employers and the organisations and communities across Ireland providing supports.

Recommendations:

1. Confirm that Temporary Protection has been extended until March 2026.
2. Clarify the post-2026 residency pathways for beneficiaries of temporary protection.
3. Outline a clear pathway to Irish naturalisation for beneficiaries of temporary protection.

3.4 Access to adequate standard of living for International Protection Applicants

Appropriate support must be provided for international protection applicants, including improved expenses allowance and child benefits. With cost of living increasing in Ireland, an increase in the Direct Provision Daily Expenses Allowance (DEA) payment, currently a weekly payment of €39.80, is crucial. Research from the Vincentian MESL Centre shows that the current DEA amount is insufficient to meet the needs of people living in Direct Provision, stating that it falls far short of providing for inclusion, integration, education, participation, or their ability to live with dignity.

Children of international protection applicants do not receive a Child Benefit payment. These children receive only a €29.80 weekly payment. The White Paper published in 2021 committed to introducing an International Protection Child Payment, equivalent to Child Benefit, for children in Direct Provision. Despite provision being made for the introduction of such a payment in Budget 2024 and Budget 2025, it has yet to be implemented.

In June 2018, Ireland transposed the EU (recast) Reception Conditions Directive into Irish law, establishing a legal right to work for international protection applicants in Ireland under certain conditions. Although the Minister for Children, Equality, Disability, Integration and Youth reduced the eligibility period from nine to six months, applications are taking approximately five months to process. These delays effectively prevent applicants from exercising their right to work within the intended six-month timeframe. Streamlining the application process is necessary to ensure that international protection applicants can meaningfully access employment opportunities as soon as they are eligible.

Recommendations:

1. Increase the Daily Expenses Allowances in line with inflation.

2. Provide a Child Benefit or equivalent payment for children in the international protection system.
3. Provide additional resourcing to address the delay on processing applications for first time applicants and renewals of Labour Market Access Permits for international protection applicants.

4. Family Reunion

4.1 Family Reunification (via the International Protection System)

Family reunification is a fundamental right for beneficiaries of international protection in Ireland. The limitation of family reunification rights, enforced by the International Protection Act 2015, has had a devastating impact on refugees in Ireland.

Adult refugees are not permitted to apply to be joined by extended family members including their parents, children aged over 18, or non-biological children who form part of the household but have not been formally adopted. The time limit on applications means that refugees no longer have the right to apply for family reunification 12 months after they are granted status. For those who are separated by war or conflict or who have family members imprisoned unjustly, it can take years to track down their family.

The International Protection Act 2015 also resulted in a vast majority of LGBTQI+ refugees remaining unable to realise their rights to family reunification with same-sex spouses or partners. The legislation restricts spousal family reunification to spouses who were married prior to the refugee seeking protection in Ireland. In the majority of refugee producing countries, same-sex sexual activity is illegal. It is possible that the refugee fled their country because of persecution based on their sexual orientation and it is unrealistic to expect, in these circumstances, couples to have married prior to the refugee fleeing their country of origin.

Recommendations:

1. Extend the time limit for the right to apply for family reunification from 12 months to 24 months.
2. Recognise de-facto partnerships for the purpose of facilitating reunification for LGBTQI+ couples.

4.2 Support for reunified refugee families

In the absence of reception and orientation supports for reunified family members, the burden of responsibility to support the integration of new arrivals falls largely on refugee sponsors and NGOs,

which are mostly limited to urban areas.⁷ Immediate support needs include applications for PPS numbers, enrollment in schools for children and access to Irish Residence Permits. As well as English language supports, families are increasingly in need of resources to prevent poverty and homelessness. These challenges have been exacerbated by the housing and cost of living crises in Ireland, as well as application processing delays.

Recommendations:

1. Local authorities should record housing needs of refugees who have an entitlement to family reunification. Housing needs should be recorded in advance of the arrival of family members that have been granted permission to come to Ireland under refugee family reunification, to allow local authorities to have accurate data and allow them to plan accordingly. This could be verified by the production of the family reunification grant letter issued by the Department of Justice.
2. Responsibility should be placed on local authorities to ensure that temporary emergency accommodation for persons admitted under refugee family reunification is available on arrival where necessary.
3. The Department of Social Protection should make provision for the fast tracking of applications of reunified family members for PPS numbers to limit delays post arrival.
4. Local authorities should fast-track the processing of applications for housing supports and Housing Assistance Payment in respect of families that arrive through family reunification and the Community Sponsorship Programme.
5. Reunified family members should be linked in with health assessments upon arrival and supported in accessing primary care health services for reunified families.
6. The Health Service Executive should be allocated responsibility to fast-track access to medical cards for eligible reunified family members.

4.3 Family Reunion for non-EEA & Irish citizens

A framework facilitating family reunion for all legal residents is long overdue, to bring Irish legislation in line with the EU Directive on the Right to Family Reunification⁸ of which Ireland has opted out. Irish citizens and migrant workers do not have a legislative right to family reunion with immediate family members, while EEA citizens benefit from stronger statutory rights under Directive 2004/38/EEC.⁹

In Nasc's experience, similar applications for family reunion often do not have similar outcomes. Depending on the embassy a family is applying through, the processes and outcomes vary widely. Decisions often appear to be discretionary, even where an applicant meets the criteria on paper. This makes it unclear to an applicant how they can overcome refusal.

Outcomes for family reunion cases in Ireland are also not at a sufficiently high standard and do not show consistent patterns of migrant rights being respected and fulfilled. Irish citizens who cannot work due to disability have been penalised for not fulfilling conditions regarding earnings and social welfare. The income thresholds are also discriminatory against family carers.

⁷ Invisible People: The Integration Support Needs of Refugee Families Reunified in Ireland (2020). Nasc, the Migrant and Refugee Rights Centre. Available at: <https://nascireland.org/publications/invisible-people-integration-support-needs-refugee-families-reunified-ireland-2020>

⁸ Family Reunification Directive. 22nd September 2003. Available at: Council Directive 2003/86/EC

⁹ Citizens' Rights Directive 2004/38/EC. 30th April 2004. Available at: <https://eur-lex.europa.eu/eli/dir/2004/38/oj>

Recommendations:

1. Irish citizens should be given parity with EEA citizens regarding access to family reunion with immediate and extended family members under Directive 2004/38/EEC.
2. Implement audits of first instance decision-making to ensure consistency across embassies, and to ensure training needs are identified and met.
3. Provide clearer guidelines across embassies regarding family reunion decision-making.
4. Simplify application process for family reunion and update policy documents with extensive written guidelines on policy changes.

5. Citizenship and Naturalisation

5.1 Access to Birthright Citizenship for Children of Refugees Born in Ireland

Since 1 January 2005, individuals born on the island of Ireland can qualify for Irish citizenship at birth if a parent held refugee status at the time of birth or had been legally resident in the State for three of the four years preceding the birth. Previously, children born in Ireland to parents granted refugee status were typically issued Irish passports, as refugees were considered to have an unrestricted right to reside under Section 6A(2)(d)(iii) of the Irish Nationality and Citizenship Act, 1956. However, in the past 18 months, the Passport Service has revised its approach, now rejecting applications where the parents have not resided in Ireland as refugees for at least three years prior to the child's birth. This shift implies that refugee status may no longer be recognised as an unrestricted right to reside. This new limitation may leave newborn children of refugees without access to citizenship.

Recommendation:

The Irish government should clarify and uphold the citizenship rights of children born in Ireland to parents with refugee status, reaffirming that refugee status constitutes an unrestricted right to reside under Section 6A(2)(d)(iii) of the Irish Nationality and Citizenship Act, 1956.

5.2 Address delays in processing applications for naturalisation

The processing of naturalisation applications is subject to long delays – as of November 2024, Nasc's service users wait approximately 19 months to receive a decision. The Department of Justice's announcement of digitisation of the citizenship application process was a welcome milestone in late 2023, which will hopefully contribute to more efficient processing going forward however we are concerned that increasing digitisation risks excluding those with lower digital literacy skills.

Recommendation:

Resource the Citizenship Section of the Department of Justice to address the backlog of citizenship applications.

5.3 Review conditions for revocation of citizenship for naturalised Irish citizens

Recent changes to the Irish Nationality and Citizenship Act, 1956 introduced new procedures around citizenship revocation. Unlike birthright citizens, naturalised citizens face the risk of citizenship revocation, effectively creating a two-tier system where citizenship is less secure for those who were not born in Ireland. This disparity undermines the principle of equality.

Naturalised citizens now have only 28 days to respond in writing to an intended revocation notice and just 14 days after the Minister's decision to request an inquiry. These restrictive timelines may prevent affected individuals from fully understanding the serious implications of revocation and hinder them from accessing timely legal assistance. Given the profound consequences of losing citizenship and the complex legal questions involved, it is troubling that there is no specific provision for legal aid in these cases.

Recommendations:

1. Introduce safeguards to ensure that persons at risk of revocation of their Irish citizenship have access to means tested legal aid. Losing citizenship has serious and far-reaching consequences, and access to legal assistance is essential for a fair and just process.
2. Extend the timeframes for naturalised citizens to respond to revocation notices and to request an inquiry. The current periods of 28 days for a written response and 14 days for requesting an inquiry are insufficient given the complexities involved.

6. Affirm commitment to creating safe and legal pathways for refugees

At the 2023 Global Refugee Forum, EU member states, including Ireland, reaffirmed their commitment to resettling individuals from countries hosting large numbers of refugees, with a particular focus on vulnerable or at-risk populations, as part of the global response to rising forced displacement. In addition to traditional resettlement efforts, the Irish Government actively supports alternative pathways that offer safe and regulated routes for refugees to reach countries like Ireland. One such initiative is the Community Sponsorship Programme, introduced by the Irish Refugee Protection Programme (IRPP) in 2019. This programme empowers volunteer groups across Ireland to assist in resettling refugees by securing rental housing and providing practical support, including material assistance, for the first two years of a refugee family's integration. Another complementary pathway is Education Pathways, supported by Irish universities, which allows refugees awaiting resettlement in their first country of asylum to pursue postgraduate studies through scholarships based on academic merit. This initiative offers refugee students opportunities for higher education while also promoting their integration into Irish society.

Recommendation:

Continue to support and expand resettlement and complementary pathway initiatives in Ireland.

7. Improve Supports for Migrant Victims of Domestic Violence

Non-EEA migrants who are resident in the State on the basis of their family relationship to a sponsor can be vulnerable to domestic abuse from their sponsor. Our 24 years of experience of working with migrants has shown us that in almost every case of domestic violence, the threat of deportation or non-cooperation with immigration status renewal has been used by abusive sponsors as a tool of coercion or control. The fear of becoming undocumented has a very chilling effect on non-EEA migrants in coming forward to seek help or in leaving an abusive relationship.

The Department of Justice does have a policy in place for migrant victims of domestic violence¹⁰ however we are concerned that this is not widely known about, relies on the discretion of an immigration officer and only applies to those who are legally resident at the time of application. Victims of domestic violence who have been forced to let their immigration permission lapse, because their abusive family members withhold their immigration documents or identity documents, are not covered by this policy. Legal Aid is not typically available for immigration assistance for migrants who have experienced domestic violence. We are concerned that making an application to the Department of Justice, finding supporting documentation and fully explaining the circumstances surrounding the abuse is a difficult and daunting process even for those whose first language is English.

Recommendations:

1. Introduce a statutory right to retain a residency permission in the event of the breakdown of a family relationship where it is warranted by particularly difficult circumstances including domestic, sexual or gender-based violence (DSGBV).
2. Provide an automatic independent right of residence after three years of lawful residence in the State.
3. Adequately resource the Legal Aid Board (LAB) to assist non-EEA victims of DSGBV to apply for independent residence to the Department of Justice.

8. Hate Crime, Hate Speech and Social Cohesion

Ireland has long been unequipped to address hate crime at a criminal justice level, while figures from An Garda Síochána show increasing numbers of reported hate crimes and incidents.¹¹ As part of the Coalition Against Hate Crime, Nasc has joined extensive campaigning to promote meaningful reform of Irish law, policy and practice related to hate crime. In October 2024 the Criminal Justice (Hate Offences) Bill 2022 was passed by Dáil Éireann, however this was following amendments which removed the parts of the bill that dealt with incitement to violence or hatred.¹²

¹⁰ <https://www.irishimmigration.ie/wp-content/uploads/2021/06/Victim-of-domestic-violence-immigration-guidelines-june-2021.pdf>

¹¹ An Garda Síochána. Hate Crime Online Reporting Statistics 2023. 18th April 2024. Available at: <https://www.garda.ie/en/information-centre/statistics/hate-crime-statistics.html>

¹² Department of Justice. Minister McEntee welcomes the passing of hate crime legislation by Oireachtas. 23rd October 2024. Available at: <https://www.gov.ie/en/press-release/a597e-minister-mcentee-welcomes-passing-of-hate-crime-legislation-by-oireachtas/>

It is imperative that legislation is in place to ensure recognition of the additional harm caused by a crime that targets a person's inherent identity and show that such behaviour is not tolerated in Ireland. In recent years there has been a litany of misinformation and delays regarding the enactment of the Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022. This has been particularly dangerous in the context of frequent rioting and tensions across the country, increasing violence at buildings earmarked as asylum-seeker accommodations, calls to action by far-right agitators to target and dehumanise people from minority populations, and increasing vulnerability and visibility of asylum-seekers in tents.

Online and in-person, Irish communities who have been disadvantaged by the cost of living and housing crises are being increasingly targeted with misinformation about asylum-seekers. Legitimate concerns about resource provision for school places, housing and General Practitioner (GP) waiting lists have been weaponised by far-right actors in order to sow division and scapegoat migrants.¹³ Social media companies have recognised how their algorithms contribute to this in a negative way. Meta's own internal research reported that "64% of all extremist group joins are due to our recommendation tools... [the] recommendation systems grow the problem".¹⁴

Recommendations:

1. Enact legislation to adequately deal with incitement to hatred offences.
2. Allocate additional resources to Gardai staffing in response to hate crimes and hate incidents. Gardai must continue to be trained on developments in Hate Crime legislation and on any changes required in policing approaches.
3. Additional funding should be allocated for cultural exchange programmes and community education on the strategies of far-right agitators.
4. Develop a detailed plan for constructively responding to organised far-right and anti-immigrant activity, including online activity.

9. Integration

The new government should prioritise the publication of a national integration strategy. While a public consultation took place in November 2023, a new strategy has yet to be released. There is an urgent need for a dedicated integration strategy and action plan that addresses the needs of asylum seekers, beneficiaries of international protection, and those arriving through refugee family reunification. Given the significant social and political changes since 2017, such a strategy is essential to support the well-being and successful integration of migrants across Ireland.

9.1 Address the distinct needs of migrant and refugee women

¹³ Maynooth University, Crosscare Migrant Project. Resisting the Far Right Civil Society Strategies for Countering the Far Right in Ireland. Cannon B., King R., Munnelly J., el-Moslemany R.. 2022. Available at: www.maynoothuniversity.ie/research/spotlight-research/are-far-right-threat-irish-democracy

¹⁴ "Facebook Executives Shut Down Efforts to Make the Site Less Divisive", Wall St. Journal, 26 May 2020. URL: <https://www.wsj.com/articles/facebook-knows-it-encourages-division-top-executives-nixed-solutions-11590507499>). This internal research in 2016 was confirmed again in 2019.

In 2020 non-EU women and girls represented 3.5% of the resident female population in Ireland.¹⁵ Migrant women can experience a double disadvantage¹⁶ and those with young children are often at increased risk of economic dependency, social isolation and loneliness. Nasc's Women's Programme supports over 160 women annually with language classes, financial literacy classes as well as resources related to employment and wellbeing. In 2023 Nasc's Women's Programme expanded to include a three-year Women's Empowerment Project, which supports the self-advocacy, political engagement and rights of women in Ireland's Direct Provision system.

9.1.1 Access to the labour market

Women from migrant backgrounds face numerous barriers in accessing the Irish labour market, often more pronounced due to limited support systems and structural challenges. Affordable and accessible childcare is essential for these women, especially for those without family networks in Ireland to help balance work and caregiving responsibilities. Additionally, limited access to training and educational opportunities, such as English language courses, restricts their ability to improve job prospects. Many migrant women lack the local cultural and contextual knowledge necessary for crafting effective resumes, applications, and interview strategies, placing them at a disadvantage in the hiring process. Administrative hurdles also create obstacles, with complex procedures around work permits, opening bank accounts, and obtaining driving licenses making it difficult for many migrant women to participate fully in the workforce. Moreover, discrimination from employers and the lack of recognition for qualifications obtained abroad force many qualified women into sectors like care work, as highlighted by AkiDwa's findings on women seeking international protection¹⁷. Wage disparities also reflect these challenges: research shows that non-EU migrant women in Ireland earn 11% less than migrant men and 30% less than Irish national men¹⁸, highlighting the economic impact of these systemic barriers. Comprehensive support in areas such as childcare, recognition of foreign qualifications, and targeted training programs would significantly enhance workforce access and integration for migrant women.

Recommendations:

1. Job placement programmes and entrepreneurship supports should be created in response to migrant women's needs.
2. Increase access to affordable childcare for all families in Ireland.
3. Provide targeted English language courses and job-readiness programs that include resume writing, interview preparation, and information on Irish workplace culture, enabling migrant women to better navigate the job market.

¹⁵ ESRI, Migrant women in Ireland may face a 'double disadvantage' September 14 2022. Available at: <https://www.esri.ie/node/9203>

¹⁶ The Economic and Social Research Institute. The integration of non-EU migrant women in Ireland. 14th September 2022. Available at: <https://www.esri.ie/publications/the-integration-of-non-eu-migrant-women-in-ireland>

¹⁷ AkiDwa. July 2022. Unlocking the Potential of Women Seeking International Protection. Available at: <https://www.akidwa.ie/assets/uploads/media-uploader/nv-women-seeking-international-protection-1-compressed1715436254.pdf>

¹⁸ Eurostat. EU - Labour Force Survey 2022. 25 November 2022. Available at: <https://ec.europa.eu/eurostat/documents/203647/15476179/EU+LFS+DOI+2022.pdf>

4. Recognition of international professional qualifications should be streamlined.

9.1.2 Women's Health

Migrant women in Ireland face significant barriers to quality healthcare due to language and communication challenges, cultural differences, and systemic obstacles. Although Ireland has a relatively low rate of maternal and perinatal deaths, migrant women—particularly those of African descent—are disproportionately affected.¹⁹ In recent years, 31% of maternal deaths involved women born outside of Ireland²⁰, underscoring the urgent need for targeted interventions to address inequalities in maternal care. Additionally, women in Direct Provision face higher rates of HIV, low birthweight, unplanned pregnancies, and inadequate access to preconception folic acid and cervical cancer screening²¹. Access to termination services is also limited for some migrant women, particularly those living outside urban areas and international protection applicants. The scarcity of culturally competent healthcare and interpretation support further compounds these issues, leaving many migrant women without full access to essential maternal health services.

Many migrant women experience socioeconomic hardship, which limits their access to support services and increases their risk of social isolation. This is especially true for those who are undocumented, have irregular migration status, or work in stigmatised or unregulated sectors. Fear of discrimination or legal exposure may prevent these women from seeking healthcare. For instance, a study of female sex workers attending the HSE Women's Health Service found that most of those working in brothels and escort agencies were migrants with limited English skills and minimal support networks; many entered sex work as a last resort for survival.²² The combination of stigma, isolation, and language barriers restricts access to both healthcare and integration services for these women.

Refugee and asylum-seeking women who have experienced sexual violence also face significant barriers to accessing healthcare. Many arrive with histories of trauma, including experiences of rape, sexual assault, or trafficking, often leading to conditions such as PTSD, depression, or anxiety. However, Ireland's healthcare system is often not equipped to address these specific needs. Female genital mutilation (FGM) is another critical concern, particularly for women and girls from Sub-Saharan Africa, the Middle East, and regions where the practice remains prevalent. FGM survivors face both immediate and long-term health consequences, including chronic pain, childbirth complications, infection risks, and

¹⁹ HSE Healthcare Pricing Office. October 2022. Perinatal Statistics Report. Available at:

https://www.hpo.ie/latest_hipe_nprs_reports/NPRS_2020/Perinatal_Statistics_Report_2020.pdf

²⁰ University College Cork. October 2023. [Confidential Maternal Death Enquiry in Ireland](https://www.ucc.ie/en/media/research/nationalperinatalepidemiologycentre/documents/MaternalDeathEnquiryReport2019-2021.pdf) Available at:

<https://www.ucc.ie/en/media/research/nationalperinatalepidemiologycentre/documents/MaternalDeathEnquiryReport2019-2021.pdf>

²¹ Lee SA, Compton A, McGuirk G, Franciosa T, Foley MP, Kennelly MM, Turner MJ. Medical and social needs of pregnant asylum-seekers in Direct Provision. *Ir Med J.* 2023 Aug 17;116(7):808. PMID: 37606235.

²² Approximately 94 percent of those engaged in sex work in Ireland are migrant women. See National Women's Council of Ireland. 21 June 2021. Defending the right not to be bought or sold for sex. Available at:

<https://www.nwci.ie/learn/article/breakt/%C2%A0www.wunrn.com/P194>

severe psychological trauma. The Irish healthcare system must overcome several challenges to meet the complex health needs of migrant women effectively.

Recommendations:

1. Expand culturally-sensitive maternal health programmes tailored specifically to migrant women with a focus on culturally-appropriate services such as nutritional support, multilingual antenatal classes, and accessible educational materials.
2. Enhance access to maternal and reproductive healthcare by increasing access to antenatal care, HIV treatment, and screening services in rural and remote locations. This ensures all women, regardless of location, have equal access to essential services.
3. Increase funding for community-based mental health services. This should include specialised training for mental health professionals to support the unique experiences of trauma and displacement among migrant populations.
4. Implement trauma-informed healthcare services for survivors of FGM and sexual violence: Allocate resources to develop trauma-informed, culturally-sensitive healthcare services that provide medical and psychological support to women affected by FGM and sexual violence, ensuring these services are accessible and safe for those with past trauma.
5. Develop mental health and counselling services in non-EEA languages and ensure access to interpretation by professionals trained in sensitive topics such as trauma and sexual violence.

9.2 Translation and Interpretation Services

Language barriers significantly reduce the quality of care and service available to migrants and ethnic minorities, impacting their ability to obtain social supports, secure housing, healthcare, report issues to Gardai, and more. The 2022 Census found that 751,507 people usually resident in Ireland spoke a language other than English or Irish at home, marking an increase of 23% from 2016. Of this cohort, 13% indicated that they spoke English 'not well or not at all'²³. These migrant populations depend on the availability of interpreters to access public services.

In Ireland translation and interpretation services are not regulated - it is possible for anyone to establish themselves as an interpreter or translator without having to demonstrate a threshold of competency in either language or to demonstrate an understanding of the ethics of interpretation. The Irish Translators' and Interpreters' Association have made a range of submissions to government bodies highlighting the need for standards in the provision of interpreters in legal, medical and international protection settings²⁴ and a HSE Working Group identified the need for regulation of interpretation as a priority in 2017²⁵.

²³ Central Statistics Office. Census of Population 2022 - Summary Results - Migration and Diversity. Available at: www.cso.ie/en/releasesandpublications/ep/p-cpsr/censusofpopulation2022-summaryresults/migrationanddiversity/

²⁴ Irish Translators' and Interpreters' Association. Submissions. Available at: www.translatorsassociation.ie/submissions/

²⁵ Anne MacFarlane. Report of the HSE Working Group to Develop a Model for the Implementation of Trained Interpreters in the Irish Healthcare System December 2017. Available at: <https://www.readkong.com/page/report-of-hse-working-group-to-develop-a-model-for-the-2480294>

Our service has extensive experience working with migrants who face substantial challenges when accessing essential public services, including the Department of Social Protection, local authorities, and the Gardaí. A consistent issue is the lack of reliable interpretation services, which often prevents individuals from effectively communicating their needs. Public offices frequently appear unaware of their obligation to provide interpretation services, or they may be reluctant to offer them, resulting in significant barriers to accessing support. In the absence of professional interpretation being offered, migrants may rely on family members or friends for informal interpretation which raises concerns about misunderstanding of the information being conveyed, lack of confidentiality and potential for exploitation.

Recommendations:

1. Clear protocols should be introduced for public office to ensure that language support is consistently provided and public-facing staff should receive training on using interpreters efficiently.
2. A national accreditation system should be introduced for interpreters and translators, in line with international standards.
3. Accessible, translated materials should be made available for all public service communications.
4. Plain English should be used on public service websites and online communications, to facilitate the use of automatic online translations.

9.3 Improve Access to Education and Training opportunities for migrant communities

With Ireland's economy experiencing high employment levels, it is increasingly critical to leverage the potential of all residents by providing equitable access to education and training. The Education and Training Board is the largest provider of further education, training, and adult education services, including English language classes, however access to their programmes is restricted based on immigration status. Spouses and children of those with an employment permit or a critical skills permit are amongst those who are excluded from accessing their courses. By restricting access to education and upskilling opportunities, Ireland risks under-utilising a valuable segment of its workforce.

9.3.1 English Language Classes

Proficiency in English is essential for most jobs in Ireland, yet current immigration restrictions and the seasonal nature of the English language programs offered by the Education and Training Board (ETB) hinder many migrants, particularly women, from gaining the skills needed for economic independence and social integration. Limited access to English classes can confine migrants to low-wage jobs, irrespective of their prior qualifications or professional backgrounds, and further exacerbate gender inequality, as women are more likely to rely on these classes.

Recommendations:

1. Year-Round English Classes: Resource the ETB to offer continuous English language classes, including summer sessions, to minimize learning gaps and support language retention.
2. Universal Access: Make English language classes accessible to all migrants, regardless of

immigration status, ensuring that language skills are not a barrier to integration.

3. Advanced English Courses: Provide funding for the ETB to offer advanced English language classes, which would enhance employment prospects for migrants with higher professional qualifications.

9.3.2 Access to Further, Higher Education and Tertiary Education

SUSI grants are an essential resource for accessing higher education in Ireland, yet restrictive immigration criteria prevent many legally resident migrants from qualifying for these grants, making third-level education inaccessible for numerous young people. Expanding grant access would not only empower migrant youth but also help sustain Ireland's competitive edge in innovation and skilled labour by promoting a diverse, educated workforce.

VTOS, which provides second-chance education and training, is only available to those over 21. This restriction limits access for younger migrants aged 18-21 who have completed secondary school but lack the means for tertiary education. Reducing the age limit would provide these young people with opportunities to enhance their skills and improve their career prospects.

Recommendations:

1. Expand SUSI Eligibility to include all legally resident migrants, enabling them to pursue higher education and contribute to Ireland's knowledge-based economy.
2. Lower the VTOS Minimum Age Requirement to include 18-21-year-olds, giving younger migrants a pathway to skill-building and economic participation.