

Submission to the Department of Children, Equality, Disability, Integration and Youth to inform a national strategy for migrant integration

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Nasc

Migrant & Refugee Rights

Submission by Nasc, Migrant and Refugee Rights Centre to the Department of Children, Equality, Disability, Integration and Youth to inform a national strategy for migrant integration.

About us:

1. Nasc, Migrant and Refugee Rights Centre is a non-governmental 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. Our Advocacy and Information service is our largest service, providing direct support to between 1000 and 1300 people annually. A secure immigration status is the foundation stone for integration in the State and is key to accessing employment, education and public services including health services. Access to free and expert information and advocacy on immigration rights is an essential component of integration for our migrant communities. Other projects at Nasc include a Women's Project providing language, wellbeing and employment support to 80 refugee and migrant women, 'Connect', our

project working with children and young people, 'New Beginnings' our project working with families in the period after family reunification or transitions from direct provision and our Ukraine Response providing Ukrainian language information and advocacy to beneficiaries of temporary protection. In addition, our Community Sponsorship and Complementary Pathways programmes work with communities preparing to welcome refugee newcomers resettling in their towns and villages or universities and workplaces.

This submission is directly informed by this work. We have aimed to identify issues disproportionately impacting Ireland's migrant, asylum seeking and ethnic minority communities.

Background and general recommendations:

2. The context in which this Integration Plan is being prepared differs significantly from its predecessor, which was launched in February 2017 and concluded at the end of 2021, following a one-year extension in response to the COVID-19 pandemic. Data from the Census 2022 (1) showed that Ireland's population has increased by 8%, surpassing 5.1 million people, and marking the largest population recorded in a Census since 1841. Approximately 20% of the population was born outside of Ireland, marking a 3% increase since 2016. (2)

1. Central Statistics Office. Census of Population 2022 - Summary Results. Available at:

www.cso.ie/en/releasesandpublications/ep/p-cpsr/censusofpopulation2022-summaryresults/

2. 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/

Since February 2022, over 99,000 people have arrived in Ireland while fleeing the war in Ukraine. There is a clear need to implement measures for long-term integration and residency, following the lifetime of the Temporary Protection Directive. Ensuring the fulfillment of, and clarity on, residency rights for those fleeing Ukraine will be important for integration outcomes in Ireland. A long-term strategy is needed for housing Ukrainians, many of whom will stay in Ireland permanently. Of the people who arrived from Ukraine, tens of thousands have re-started their lives and begun to settle in Ireland, and this needs to be incorporated into housing and integration strategies at local and national levels.

Recommendation: Ensure a long term residence or a pathway to citizenship for Ukrainian beneficiaries of temporary protection and that information on this is available significantly in advance of March 2025.

3. As a member of the Migrant Integration Strategy Monitoring and Coordination Committee for the Integration Strategy 2017-2020 'A Blueprint for the Future', we were particularly concerned that the Strategy excluded international protection applicants from its remit. The integration needs of international protection applicants were mentioned only once in the Strategy with reference to ensuring that “young people from ethnic or religious minorities, migrants, refugees and asylum seekers have access to youth services...”.

In 2022, Ireland saw 13,650 international protection applications. This marked a 186% increase on the number of applications received in 2019, after which application numbers became impacted by the COVID-19 pandemic. (3)

4. The Catherine Day Report, published in October 2020 (4) and the White Paper on Ending Direct Provision, published in February 2021 (5) made sweeping recommendations for the complete overhaul of Ireland's reception system also included recommendations on integration. The White Paper recommendations included a new accommodation model, a child benefit equivalent for Direct Provision residents and regulation of interpretation services. These recommendations have not been implemented, while numbers in the international protection process have significantly increased. At time of writing, an updated White Paper has not been published.

The White Paper also recommended that funding allocations be made to local authorities for Integration Support Workers. This initiative has progressed, and marks a positive development for Ireland's migration integration efforts. It is important that these roles are managed and

3. Dáil Éireann Debate. International Protection. 22 November 2023. Available at:

[www.oireachtas.ie/en/debates/question/2023-11-22/117/?](http://www.oireachtas.ie/en/debates/question/2023-11-22/117/?highlight%5B0%5D=asylum&highlight%5B1%5D=asylum&highlight%5B2%5D=asylum&highlight%5B3%5D=asylum&highlight%5B4%5D=asylum)

[highlight%5B0%5D=asylum&highlight%5B1%5D=asylum&highlight%5B2%5D=asylum&highlight%5B3%5D=asylum&highlight%5B4%5D=asylum](http://www.oireachtas.ie/en/debates/question/2023-11-22/117/?highlight%5B0%5D=asylum&highlight%5B1%5D=asylum&highlight%5B2%5D=asylum&highlight%5B3%5D=asylum&highlight%5B4%5D=asylum)

4. Government of Ireland. Report of the Advisory Group on the Provision of Support including Accommodation to Persons in the International Protection Process. September 2020. Available at: <https://assets.gov.ie/93440/05b40003-242c-4549-88a5-ba8fcdc20f60.pdf>

5. Government of Ireland - Department of Children, Equality, Disability, Integration and Youth. A White Paper to End Direct Provision and to Establish a New International Protection Support Service. February 2021. Available at: www.gov.ie/pdf/?file=https://assets.gov.ie/124757/ef0c3059-b117-4bfa-a2df-8213bb6a63db.pdf#page=null

implemented strategically, in order to support constructive communication regarding barriers to integration. By feeding back information regarding any developing social issues, the Integration Support Workers can facilitate preventative and responsive action for social cohesion. There also needs to be a streamlined approach to the implementation of Integration Support roles around the country, in order to prevent silos and heighten the positive impact of this initiative.

5. Over 5,600 people living in Direct Provision in Ireland are not able to move out despite receiving their immigration status, due to a lack of follow-on accommodation. (6) This cohort is at risk of 'hidden homelessness', which is not represented or reported adequately in Ireland's homelessness policy and statistics. (7) They are not deemed homeless by local authorities and therefore can not access various homeless supports. Capacity issues have also led to hundreds of newly arrived international protection applicants becoming street homeless for weeks or months. Medium and long-term planning is required in order to ensure homelessness does not become a recurring issue for international protection applicants and those who have gained immigration status in Ireland.

6. Irish Examiner. Over 5,600 refugees with right-to-remain still in direct provision. 30 October 2023. Available at: www.irishexaminer.com/news/arid-41258995.html

7. Maynooth University. Ireland's Hidden Homelessness Crisis. Hearne R., McSweeney K.. November 2023. Available at: www.maynoothuniversity.ie/applied-social-studies/news/report-ireland-s-hidden-homelessness-crisis

Recommendations:

- Additional investment is needed for transition supports for people in direct provision.
- An updated White Paper on Ending Direct Provision must be published, with a clear timeline for the implementation of recommendations.

6. Integration needs can vary across the diverse migrant populations in Ireland. For example, those who have been in Ireland for a long period of time will likely not have high needs in terms of immigration support, but could require more extensive social integration supports. Family resettlement supports are vital for newly arrived families in Ireland. Applications for social welfare benefits and services can only be made once the family has arrived in Ireland, completed their immigration registration and have been allocated a PPS number. Migrant families face a plethora of issues due to registration appointment backlogs, lack of interpretation support in immigration services and PPSN allocation centres, and lack of training for front-line officials to deal with the particular needs and circumstances of those of refugee background were all identified as issues. Delays also mean that families are left in financial difficulties while waiting to access social welfare support.

Reunified families have particular relational support needs due to their often lengthy periods of separation, traumatic experiences, evolving family roles and expectations. Evidence-based holistic interventions are

an important tool in fostering a sense of belonging. Invisible People, a 2020 report from Nasc highlighted the need for initiatives that address the unmet integration needs of refugee families reunifying in Ireland following long periods of separation.

The report identified the similarity of challenges for reunified families and resettled families and pointed to the disparity of post-arrival supports offered. Recommended interventions include the provision of mental health and intercultural workers for reunified families, with relevant training for those workers to ensure that they can address the families' unmet integration needs. (8) Based on the report recommendations, Nasc developed a social work-led initiative to work with reunified families and families transitioning out of direct provision. (9) We have found that the frontloading of support after arrival leads to significantly improved short, medium and long-term integration outcomes for the children of these families.

Recommendation: Reunified families should be supported with culturally appropriate supports in relation to mental health and relationships, as well as access to local integration projects.

8. Nasc, the Migrant and Refugee Rights Centre. Invisible People: The Integration Support Needs of Refugee Families Reunified in Ireland. 2020. Smith K., Ní Raghallaigh M., Johnson D., Izzeddin A.. Available at: <https://nascireland.org/publications/invisible-people-integration-support-needs-refugee-families-reunified-ireland-2020>

9. Nasc, the Migrant and Refugee Rights Centre. New Beginnings: Children & Families Project. Available at: <https://nascireland.org/current-projects/new-beginnings-children-families-project>

7. Nasc's 'We Are Cork: Stories from a Diverse City' report noted the importance of facilitating cross-cultural understanding and celebration. This includes community education among white Irish populations, to facilitate a greater understanding of immigrants' cultures, just as immigrants in Ireland learn about Irish culture. (10) The 2022 Census found that approximately 15% of people in Ireland spoke a language other than English or Irish at home, and of that cohort, 13% spoke English 'not well or not at all'. (11) Different migrant demographics have diverse needs in terms of language support. For example, work schedules, childcare commitments and previous education can all impact their ease of access to an English language course.

8. Social cohesion has been increasingly under threat in communities across the country in recent years. The housing and cost of living crises have been weaponised against migrants in Ireland. Local communities with legitimate concerns about resource provision for school places, housing and General Practitioner (GP) waiting lists continue to be targeted by far-right actors in order to sow division and scapegoat migrants. (12) Non-governmental organisations and community groups have also been targeted. Far-right activity often involves presenting simplistic solutions to complex issues, ignoring the root

10. Nasc, the Migrant and Refugee Rights Centre. We Are Cork: Stories From A Diverse City. 2022. Available at: <https://nascireland.org/publications/we-are-cork-stories-diverse-city-2022>

11. Supra note 2.

12. 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

causes of inequality in communities and encouraging the dehumanisation of minority groups such as migrants.
(13)

Recommendations:

- Integration planning needs to incorporate medium and long-term social cohesion solutions, to prevent and respond to anti-migrant sentiment and violence. This would include adequate resourcing for communities with growing populations, community education to combat racism and to raise awareness of misinformation online and in-person, and support for accessible community spaces which foster a sense of belonging across and within different populations.
- Additional funding is needed for grassroots and voluntary organisations that promote community cohesion.

Introduction:

9. Migrant people in Ireland face a myriad of barriers in integrating into Irish society. As well as policies and practices that exclusively disadvantage immigrants, other barriers in which migrant people are disproportionately impacted include employment access,

opportunities to socialise safely, access to education, access to housing and political participation. Lack of availability of interpretation services threads through many of these barriers, and is in itself an immediate challenge to integration.

Inclusive policy development can contribute to the integration of migrants by incorporating their varied experiences and needs, and ensuring that the relevant local and national policies can be applied to all populations in Ireland. Without assessing the needs of migrants during the development and implementation of public policy, those populations slip through the cracks. The examples below show some of the unnecessary issues which exclusively affect migrants' access to public services and supports, and the related challenges to their integration in Irish society:

10. Immigration-proofing policy and legislation: All government departments and agencies should be aware of the diversity of the Irish population when developing new policies or legislation which have residency or nationality requirements. Before residency or nationality requirements are imposed, an audit of how these policies may impact across different immigration statuses should be carried out. Imposing restrictive residency or immigration criteria can often have unintended consequences. One such example is children and young

people who were granted residency through the Regularisation Scheme - they will not have access to SUSI grants while they continue to hold that immigration permission. This is likely to significantly impede young people in pursuing higher education and have long term consequences for their employment prospects and integration in Ireland.

Recommendations:

- Policy and legislation in Ireland should be subject to audit to determine its impact on diverse groups of migrants.
- When access to state supports is made dependent on holding a particular nationality or immigration status, an assessment of the impact of these eligibility rules on those excluded because of their immigration status should be carried out and should be made publicly available.

11. Security of Residence: The Migrant Integration Strategy 2017-2020 contains a commitment by the Department of Justice to introduce a scheme to introduce a permanent residence scheme in Ireland (Action 11) however action was not progressed on this. Ireland continues to operate two administrative schemes, Without Condition as to Time and Long Term Residence Scheme however both of these have extremely strict conditions and require the person to remain resident in Ireland.

The experience of our service users who may have lived in Ireland for over a decade but are forced to return to their country of origin to care for an elderly parent or are asked to relocate temporarily for work is that they lose their residency after several months living outside of Ireland. It is important that Ireland adopts a permanent residence scheme to facilitate those who do not wish to apply for Irish citizenship or are not in a position to apply for Irish citizenship.

Recommendation: Introduction of a Permanent Residence Scheme is needed.

12. Naturalisation: Migrants to Ireland are eligible to apply for naturalisation as Irish citizens if they fulfil a number of statutory eligibility criteria, namely being of age (over 18), of ‘good character’ and having requisite reckonable residence. (15) Although ESRI/European Migration Network research has found that Ireland has more favourable conditions for acquiring citizenship by naturalisation than many other EU Member States, (16) there are outstanding issues with the naturalisation process. Ireland lacks publicly available guidance on what constitutes ‘good character’ for the purposes of a naturalisation application. Applicants are required to disclose relevant information on convictions, civil judgments and any Garda investigations.

15. Irish Statute Book. Irish Nationality and Citizenship Act, 1956. Section 15: Conditions for issue of certificate. Available at: www.irishstatutebook.ie/eli/1956/act/26/section/15/enacted/en/html

16. Economic and Social Research Institute, European Migration Network Ireland. Pathways to citizenship through naturalisation in Ireland. Groarke S., Dunbar R. 7 December 2020. Available at: www.esri.ie/publications/pathways-to-citizenship-through-naturalisation-in-ireland

However there is no guidance for an applicant who may have committed a minor offence, as to whether this is likely to lead to a finding that they are not of good character. There is also no clear guidance as to how offences committed while the applicant was a minor should be treated. Our experience at Nasc has been that similar applications can be treated inconsistently and the lack of transparency also means that it is difficult to assess whether an application is likely to fail the ‘good character’ assessment. This may lead to applicants submitting multiple, unsuccessful applications for naturalisation.

Recommendation: A ‘good character’ guidance document should be published by the Department of Justice. This would create transparency around the treatment of offences for applicants, while also promoting consistency in decision-making.

13. Child welfare among immigrant populations is not accounted for in key public policies. For example, while Child Benefit is deemed to be a universal payment, children in the international protection process are not supported by any such payment. Qualification for this payment is considered based on the parent/s’ immigration status. (17) Undocumented children, and children whose immigration status does not allow access to the social welfare system, are also excluded from this payment.

17. Supreme Court of Ireland. Michael and Others v. Minister for Social Protection [2019] IESC 82. 21 November 2019. Available at: <https://ie.vlex.com/vid/v-minister-for-social-839141776>

This leaves migrant youths at a disadvantage in terms of wellbeing and social integration, as they have less opportunity to join after-school clubs and social activities. (18) The 2021 White Paper noted that: “Applicants in Phase Two who have dependent children will also receive an additional monthly payment per child in the form of an International Protection Child Payment from DCEDIY.” (19) A more inclusive Child Benefit payment (or the International Protection Child Payment proposed in the White Paper) would mark an important shift in integration opportunities for migrant children.

Recommendation: Child Benefit or an equivalent payment should be made available for children who are currently excluded.

14. Provision of information and services in an accessible manner: Being able to access information and services in a way that they can understand and act on is essential to migrants’ ability to exercise their rights autonomously and integrate successfully. This includes ensuring that information and documentation related to rights and entitlements issued by government departments and agencies is provided in Plain English, as well as ensuring the provision of interpretation services when appropriate.

18. Irish Refugee Council. Living in International Protection Accommodation: Exploring the Experiences of Families and Children in Direct Provision. Cid S. 5 October 2023. Available at: www.irishrefugeecouncil.ie/news/new-research-sheds-light-on-income-inadequacy-faced-by-children-and-families-living-in-international-protection-accommodation

19. Supra note 5.

For example, access to interpretation free of charge is available at HSE hospitals on request, but it is not available in primary healthcare settings. Furthermore if a person needs access to an interpreter, this would need to be paid by the GP or the patient themselves, creating an affordability issue. A positive example of ensuring access to information for migrants was the HSE's interim interpretation service booking for Ukrainian and Russian interpretation in the wake of the conflict in Ukraine. (20) In March 2022, the HSE put in place a booking service where GPs with Ukrainian or Russian speaking patients could request the provision of interpretation -by phone or in person. This service was funded centrally by the HSE.

Recommendations:

- Publications from government departments and agencies should always be provided in Plain English.
- Additional resources should be allocated for translation of those publications, as well as for free of charge, public interpretation services when appropriate.

15. Access to English language supports is of particular importance to migrant populations in Ireland, for access to the Irish labour market, to education and to social integration opportunities. A 2018 SOLAS report indicated that there is a poor provision of higher level English classes for qualified migrants, and that there is no appropriate provision of English language support for low-skilled and unemployed migrants. (21) This disadvantages those migrants who hold professional qualifications which can not be recognised or validated in Ireland until they attain and show evidence of a high level of competence in English - for example, by passing examinations for the International English Language Testing System (IELTS) or Test of English as a Foreign Language (TOEFL).

An issue that arises for Nasc service users in full-time, but low paid employment is that their ability to access English language classes is restricted by their working hours. This hampers their ability to progress within their chosen profession and to develop their language competence.

Recommendations:

- Additional resourcing is needed for Education and Training Boards (ETBs) to provide free English language classes across multiple levels.
- To ensure accessibility of classes for migrant populations, a variety of options should be provided in terms of class locations and schedules.

21. SOLAS. English language provision and language assessment for low-skilled and unemployed migrants - Recommendations for good practice at NFQ levels 1-3 in ETBs. Available at: www.solas.ie/f/70398/x/7a61ee6ee9/english-language-provision-and-language-assessment.pdf

16. Cultural competency among public service providers and people who work with migrants is an important facilitator of positive relationships and integration, and can affect migrants' experiences in Ireland from the day they arrive. Cultural knowledge can include race, ethnicity, immigration status, religious traditions, spiritual belief systems, family systems, political history, sexual orientation, gender identity, social class, individual and group oppression, and mental or physical abilities. (22) Awareness of one's own cultural norms, as well as the norms of others, is important in combating unconscious biases, stereotyping and tensions.

Recommendation: Cultural competency training should be made available regularly to all public bodies and statutory services.

17. Driving license qualification is a key facilitator of integration for many migrants in Ireland, who may not otherwise be able to access education, employment and social opportunities. Up until 2019, all persons without an Irish driving license had to complete twelve sessions of Essential Driver Training (EDT) and wait 6 months from the issuing of their learner permit before undertaking a driving test. In January 2019, the Road Safety Authority introduced a reduced EDT programme for foreign license holders that can not exchange their license in Ireland.

22. AkiDWA. Becoming Culturally Competent - Guidelines for individuals and groups working with vulnerable migrants. Available at: <https://akidwa.ie/wp-content/uploads/2022/09/Becoming-Culturally-Competent.pdf>

This programme allowed foreign driving license holders to apply to avail of reduced EDT, for a minimum of six rather than twelve driving lessons, and removed the six months waiting time to sit the driving test. (23) However, the requirements to access reduced EDT make it inaccessible. Applicants are required to have a letter of entitlement – a document from the licensing authority that issued the foreign license. The document may not be available in the licensing authority country, and in the case of persons who have refugee status or are in the International Protection system it is not reasonable to expect them to contact authorities from the State that they sought protection from.

Recommendations:

- Reduce barriers to accessing the RSA's reduced EDT programme – this would reduce unnecessary delays for driving test bookings.
- Remove the requirement to provide a letter of entitlement in respect of foreign license holders' applications to access the RSA's reduced EDT programme. This is particularly pressing in the cases of refugees and those who reside in Ireland on the basis of seeking protection from their country of origin.

23. Road Safety Authority. Reduced Essential Driver Training Programme (EDT) for Foreign Licence Holders. Available at: www.rsa.ie/docs/default-source/services/1257-information-about-reduced-edt-for-foreign-licence-holders-nov-2022-web-final.pdf?sfvrsn=84,96e3f9_7

18. Foreign birth registration processing: The Foreign Births Register allows the descendants of Irish people who have moved abroad to claim Irish citizenship. (24) The system of foreign birth registration for children born abroad to Irish citizens and naturalised Irish citizens can be cumbersome and lengthy. The current number of applications for entry into the Foreign Births Register is in excess of 38,000 (25) and the average processing time is nine months. (26)

Recommendation: Additional resources should be made available to foreign birth registration office to eliminate processing delays.

19. Registration of births in Ireland: All children born in Ireland must legally have their births registered with the Civil Registration Office. Our organisation has worked with migrant and refugee families who have been prevented from registering their child's birth because of the uncertainty around the mother's marital status. This creates knock-on barriers to accessing PPS numbers and medical care for the child. Section 22(3) of

24. Citizens Information. The Foreign Birth Register. Available at:

www.citizensinformation.ie/en/moving-country/irish-citizenship/foreign-births-register/

25. Dáil Eireann Debate. Foreign Birth Registration. 24 October 2023. Available at:

[www.oireachtas.ie/en/debates/question/2023-10-24/123/?](http://www.oireachtas.ie/en/debates/question/2023-10-24/123/?highlight%5B0%5D=foreign&highlight%5B1%5D=birth&highlight%5B2%5D=registrations)

[highlight%5B0%5D=foreign&highlight%5B1%5D=birth&highlight%5B2%5D=registrations](http://www.oireachtas.ie/en/debates/question/2023-10-24/123/?highlight%5B0%5D=foreign&highlight%5B1%5D=birth&highlight%5B2%5D=registrations)

26. Dáil Eireann Debate. Foreign Birth Registration. 26 September 2023. Available at:

[www.oireachtas.ie/en/debates/question/2023-09-26/97/?](http://www.oireachtas.ie/en/debates/question/2023-09-26/97/?highlight%5B0%5D=foreign&highlight%5B1%5D=birth&highlight%5B2%5D=registration&highlight%5B3%5D=foreign&highlight%5B4%5D=birth&highlight%5B5%5D=registration)

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the Civil Registration Act 2004 (27) has an unintended but disproportionate impact on families from asylum-seeking and refugee backgrounds. This sub-section provides for the inclusion of the father's details when registering the birth of a child, in instances where the mother is married to a person who is not the father of that child. Inclusion of the biological father's details in the birth registration can be exceedingly difficult, for example where the mother cannot satisfy the requirements of Section 22 (3) by either proving that she was separated or divorced from her husband in the ten months before the child's birth, or by supplying the Civil Registration Office with a Statutory Declaration from her husband in the country of origin to the effect that he is not the child's father. This particularly impacts families from migrant or refugee backgrounds as it is more difficult to utilise Irish legal mechanisms to compel the absent husband in the country of origin to cooperate with the process.

Recommendation: Section 22(3) of the Civil Registration Act (as amended) should be assessed for disproportionate impact on children born to refugee and asylum-seeking parents.

27. Irish Statute Book. Civil Registration Act 2004. Available at: www.irishstatutebook.ie/eli/2004/act/3/enacted/en/html

Inadequate resourcing of public services has a detrimental impact on access to crucial integration supports, and on the fulfillment of migrants' rights. The examples below outline the importance of sufficient staffing for the implementation of policies and the fallout for migrant integration where resourcing is insufficient:

20. Processing delays for Personal Public Service (PPS) Numbers creates a damaging knock-on effect in accessing essential government supports and public services. This leaves new arrivals to Ireland, regardless of their citizenship or immigration status, unable to access social welfare, housing supports, banking and credit union accounts for weeks to months at a time. Without a PPS number it is not possible to avail of essential health supports such as medical cards and GP visit cards - including for children under 8 years old. Essential reproductive services including terminations, contraception and access to maternity and infant care services, are also not available without a PPS number, along with the Drug Payment Scheme, and the Long-Term Illness Scheme.

Recommendations:

- Additional resource allocations for the Department of Social Protection could prevent further backlogs and delays.
- Beneficiaries of Temporary Protection (BOTPs) arriving in Ireland from Ukraine have benefited from immediate access to PPS numbers - a similar process should be considered for International Protection applicants.

21. Immigration Permission Registration is also subject to substantial delays, particularly in areas outside of Dublin. Non-EEA migrants (with the exception of UK nationals), over the age of 16, are required by law to register their immigration permission within 90 days of entry to the State and are required to maintain their immigration registration throughout their residency. Nasc's clients have experienced significant delays in obtaining appointments which has consequences for accessing or continuation of access to social welfare, housing and employment and eventual access to naturalisation. At time of writing in November 2023, the GNIB office in Cork City was processing requests for registration appointments from August 2023.

Recommendations:

- The Immigration Service Delivery online system for immigration registration, currently available to people residing in Dublin, should be made available to all third country nationals required to register.
- Until such time as this, further resourcing should be provided to the Garda National Immigration Bureau (GNIB) offices to target backlogs.

22. Translation and Interpretation: 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'. (28) These

28. Supra note 2.

migrant populations depend on the availability of interpreters to access public services. However, in Ireland these 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 settings. (29) In other countries interpretation and translation are strictly regulated, in terms of language competency as well as the interpreters’ behaviour in the course of the translation session.

Nasc have repeatedly heard from clients and service users that they may have struggled to communicate with an interpreter who spoke a different dialect or who wasn’t fluent in the language they were interpreting in. It is also deeply concerning that there are instances where the interpreter deliberately fails to interpret accurately.

The availability of interpretation for people accessing public services is highly inconsistent. Migrants continue to depend on family members and friends to provide informal translation and interpretation, so that they can access health, housing and social welfare services. They

29. Irish Translators’ and Interpreters’ Association. Submissions. Available at: www.translatorsassociation.ie/submissions/

are not made aware of the availability of interpretation services. This can impact significantly on the quality of care or service provided to migrants and people from ethnic minority backgrounds and their ability to exercise their rights.

Recommendations:

- A national accreditation system should be introduced for interpreters and translators. Accessible, translated materials should be made available for all public service communications.
- Plain English should be used on public service websites and online communications, to facilitate the use of automatic online translations.

23. Civil Legal Aid: Although immigration matters are not excluded from the scope of the 1995 Civil Legal Aid Act, (30) in practice legal aid is not provided for immigration-related applications. Immigration-related applications often raise complex issues of constitutional law, legislation, EU law and rights under the European Convention on Human Rights. Our experience is that applicants who are unable to access a Non-Governmental Organisation with specialist knowledge and who do not have the means to pay for a private practitioner, may have to prepare and submit complex applications without

30. Irish Statute Book. Civil Legal Aid Act 1995. Available at: www.irishstatutebook.ie/eli/1995/act/32/enacted/en/html

any advice or assistance. Poor quality applications can have very significant negative and long-term consequences for applicants, particularly given the limited appeal mechanisms should an application be unsuccessful.

Nasc believes that the Legal Aid Board (LAB) should be sufficiently staffed and resourced to support the increased number of persons seeking international protection in the State. Early legal advice is crucial to ensure that applicants can fully engage with the procedure, and to ensure that their protection claim is fully articulated.

Recommendations:

- The Civil Legal Aid Scheme should be expanded to include immigration-related applications.
- In line with the recommendations of the Advisory Group on the Provision of Support including Accommodation to Persons in the International Protection Process, the Legal Aid Board should be resourced to handle all international protection cases in-house.

Social issues such as access to employment, education, housing, social opportunities and representation, impact all populations in Ireland, but have a disproportionately negative impact on migrants. The examples below outline how these issues pose additional challenges for migrants in integrating into Irish society:

24. Accessible communication with government bodies can be supported by strategic and consistent use of plain English in online, written and verbal communications. This is important for Irish nationals with unmet literacy needs, and is particularly important for migrants whose first language is not English. It is important that publications by government bodies can be accessed via mobile phone, where materials can be translated automatically online.

Recommendations:

- Plain English should be used on public service websites and online communications, to facilitate free and automatic translations.
- Multiple language translations should also be provided on government pages.
- Publications could be made available via QR codes to facilitate easy access by phone.

25. Access to employment for migrants in Ireland poses a number of structural, administrative and cultural challenges. Migrants face disproportionately poor pay rates, poor working conditions, and structural discrimination, which significantly hinders professional progression. Many of Nasc's clients hold university degrees

from their countries of origin but struggle to have these qualifications and professional experience recognised by Irish employers. Furthermore, data from the ESRI showed that migrants in Ireland are more likely to be employed in lower quality jobs, and 21% less likely to be members of trade unions or staff associations compared to Irish nationals. (31) This research also indicated that migrant women in Ireland earn 11% less than migrant men, and 30% less than Irish national men, while migrant men earn 18% less than Irish men. (32)

We welcome the recent announcement by the Irish government to expand its civil service recruitment to people with Stamp 4 permissions (33) and would encourage the government to consider how to incentivise the private sector to fully recognise the skills and experiences of our diverse migrant population. Having prior qualifications recognised and registered in Ireland is a key facilitator of decent employment that matches the employee's skills and experiences. (34) Nasc welcomed the support provided to

31. Economic and Social Research Institute, Government of Ireland - Department of Children, Equality, Disability, Integration and Youth. Wages and working conditions of non-Irish nationals in Ireland. Laurence J., Kelly E., McGinnity F., Curristan S. 19 January 2023. Available at: www.esri.ie/publications/wages-and-working-conditions-of-non-irish-nationals-in-ireland

32. Ibid.

33. Government of Ireland - Department of Public Expenditure, NDP Delivery and Reform. Minister Donohoe announces expanded eligibility requirements to promote greater diversity in the Irish Civil Service. 23 October 2023. Available at: www.gov.ie/en/press-release/f4c3b-minister-donohoe-announces-expanded-eligibility-requirements-to-promote-greater-diversity-in-the-irish-civil-service/

34. Dublin City Community Co-Op. Lessons and Recommendations from the front line of Ireland's refugee response. December 2022. Available at: <https://dublincitycommunitycoop.ie/wp-content/uploads/2022/12/Lessons--Recommendations-from-the-front-line-of-Irelands-Refugee-Response.pdf>

Ukrainian arrivals in this regard. For example, the Nursing and Midwifery Board of Ireland provided Ukrainian-translated information regarding registration processes, and direct support for registration applicants. The Department of Health also funded clinical English language training for Ukrainians, to ensure that they could meet the English language proficiency required for registration with a professional regulator in Ireland. (35)

With lower awareness of their employment rights, and fear of challenging employers' malpractice, migrants are left vulnerable to exploitation. Nasc notes that legal aid is not currently available for cases under the Equal Status Acts 2000 - 2018 (36) and Employment Equality Act 1998 - 2011, (37) before the Workplace Relations Commission (WRC) for persons impacted by discrimination, including in the workplace. This means that migrants and ethnic minorities who experience discrimination based on race, and who do not have the means to pay for private legal representation, may have to go without legal support. This hinders migrants' access to justice, employment, professional progression and integration.

35. Nursing and Midwifery Board of Ireland. Supports for Ukrainian Nurses and Midwives Seeking to Practise in Ireland. 7 March 2023. Available at: www.nmbi.ie/News/News/Supports-for-Ukrainian-Nurses-and-Midwives-Seeking

36. Irish Statute Book. Equal Status Act, 2000. Available at: www.irishstatutebook.ie/eli/2000/act/8/enacted/en/html

37. Irish Statute Book. Employment Equality Act, 1998. www.irishstatutebook.ie/eli/1998/act/21/enacted/en/html

Migrants experience administrative barriers to employment such as applications for work permits, opening bank accounts, and accessing driving license certifications. Lack of English language skills and social or professional networks in Ireland can block migrants from the labour market. Successfully preparing for resumes, applications and interviews requires cultural, contextual knowledge that some migrants do not have access to. Migrant women can face additional challenges including full responsibility for childcare, without a family network to support them. Affordable and accessible childcare is often crucial to their labour market access. EU Labour Force Survey data indicates that non-EU women have higher rates of unemployment than Irish nationals and migrant men. (38)

International Protection Applicants who have the right to work in Ireland are currently experiencing significant delays with new applications for labour market access permits and with renewals of labour market access permits. This creates delays for international protection applicants in entering the labour market. Delays in renewing labour market access permits may mean that international protection applicants are suspended from employment. This disincentivises employers from employing international protection applicants due to the instability of their right to work.

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

Recommendations:

- Legal aid support should be expanded for workplace discrimination cases.
- Government programmes need to prioritise migrant-oriented job placement programmes and entrepreneurship supports.
- Migrants should be provided with additional support relevant to recruitment processes in Ireland.
- Recognition of international professional qualifications should be streamlined. Migrants should be supported in this process with accessible information in multiple languages, as soon as they arrive in Ireland.
- Significant state investment in the availability of affordable childcare is needed to ensure that migrants who are parents of young children can access the labour market.
- Additional resourcing is required to address the delay on processing applications for first time applications and renewals of Labour Market Access Permits for international protection applicants.

26. Further and Higher Education access is a major issue for migrants of various demographics in Ireland. Migrant youths face restrictions related to their particular residency permissions, which often hinder access to financial support for further or third-level education. Eligibility for SUSI grants is limited to those who have specific immigration statuses, which can leave thousands of young people without recourse to financial assistance to attend higher education, including those who secured residency through the Regularisation Scheme, young people with long term residency status, young people exiting care on 'exceptional Stamp 4s' and children of employment permit holders. These restrictions are not well known, which means that every year hundreds of children and young people are suddenly made aware of their lack of access to SUSI grants.

Furthermore, to avail of EU university fees, as opposed to the higher non-EU fees, students must have been resident in the EU, an EEA member state, Switzerland or the UK for at least three of the last five years prior to admission to their chosen course. This means many migrants must wait three years following their arrival in Ireland before applying for third-level education, after which their access to financial support may still be limited.

Recommendations:

- SUSI grants should be made available to all young people legally resident in the State.
- EU fees and financial aid should be made more accessible for people with migrant backgrounds in Ireland.

27. Diversification of primary schools: The 2022 Census noted that over 14% of the population have no religion. (40) This marked a 63% increase since 2016, and a 187% increase since 2011. In light of an increasing demand to diversify the predominantly Roman Catholic patronage and ethos in primary schools, the government has set a target for 400 additional multi-denominational primary schools by the year 2030. (41) This would mark an important shift for cross-cultural learning and for more inclusive school experiences for children of all ethnicities, religious and cultural backgrounds. The Schools Reconfiguration for Diversity process was launched in 2022 to support schools' transfer to multi-denominational patronage. However, there is a lack of progress in terms of school uptake on transfers despite growing demand, and the government has not provided interim targets or strategy for how its 2030 target will be met. Educate Together has highlighted the need to allow applications to be made for the recognition of a new school where there is

40. Central Statistics Office. Census of Population 2022 - Summary Results - Diversity, Migration, Ethnicity, Irish Travellers & Religion. Available at: www.cso.ie/en/releasesandpublications/ep/p-cpp5/census2022profile5-diversitymigrationethnicityirishtravellersreligion/religion/

41. Government of Ireland - Department of Education. Schools Reconfiguration for Diversity. 11 March 2022. Available at: www.gov.ie/en/publication/811e2-schools-reconfiguration-for-diversity/

sufficient parental demand. (42) The organisation has criticised the Government's reconfiguration process due to the lack of information provided to parents, and ineffective and insufficient engagement with relevant stakeholders.

Recommendation: The establishment of new schools with diverse patronage should be facilitated according to parental demand.

28. Housing is an ongoing crisis for migrant populations, who face specific challenges in relation to accessing the housing market. Safe and secure accommodation is crucial to establishing social networks. These networks, and their positive impact on integration is damaged when people are forced into transient patterns in Ireland.

Many migrants can not access social welfare supports, depending on their particular immigration permission. The eligibility criteria for such supports includes a requirement to be habitually resident in the State. (43) This habitual residence condition requires that the applicant has received permission to reside in the State, which excludes those who are undocumented. While Irish housing policy does not require that applicants for social housing support have a right to reside in Ireland, migrants

42. Educate Together. Educate Together CEO calls for urgent action on school choice in Ireland. 6 May 2023. Available at: www.educatetogether.ie/news/urgent-action-on-school-choice-needed/
43. Irish Statute Book. Social Welfare And Pensions (No. 2) Act 2009. Available at: <https://www.irishstatutebook.ie/eli/2009/act/43/enacted/en/html>

are also sometimes excluded from receiving these supports. Housing Circular 41 of 2012 is used as guidance by Housing Authorities, but does not account for current legislation and recent European Court of Justice case law. (44) This can lead to the exclusion of those applicants who have an entitlement that is not mentioned in the circular.

Migrants and those of Black ethnicity are overrepresented in the homeless population in Ireland. (45) There is an ongoing risk of street homelessness for newly arrived international protection applicants in Ireland, due to capacity issues. Many of Nasc's clients face disadvantages in accessing the private rental market, leaving them at a higher risk of homelessness. Unfortunately, there is no empirical data available regarding rental discrimination in Ireland, but anecdotal evidence suggests that people are often refused housing based on their ethnicity. (46) Despite the Equal Status Acts 2000 - 2018 (47) prohibiting discrimination on the ground of race in relation to the provision of accommodation and termination of tenancies, migrants in Ireland continue to face exclusion from the private rental market due to discrimination.

44. Government of Ireland - Department of Housing, Local Government and Heritage. Circular Housing 41/2012 - Access to Social Housing Supports for non-Irish nationals. 2 December 2012. Available at: www.gov.ie/en/circular/42023-circular-housing-412012-access-to-social-housing-supports-for-non-irish-nationals/

45. Economic and Social Research Institute. Monitoring adequate housing in Ireland. Russell H., Privalko I., McGinnity F., Enright S.. 14 September 2021. Available at: www.esri.ie/publications/monitoring-adequate-housing-in-ireland

46. Supra note 10.

47. Irish Statute Book. Equal Status Act, 2000. Available at: www.irishstatutebook.ie/eli/2000/act/8/enacted/en/html

Over 5,600 people living in Direct Provision in Ireland have already received their immigration status, but can not move out due to a lack of follow-on accommodation. (48) They make up part of Ireland's 'hidden homelessness' population, which is not represented or reported adequately in Ireland's homelessness policy and statistics. (49) Due to the lack of recognition by local authorities of their homeless status, they can not access various homeless supports. Nasc is concerned by the Government's practice of issuing transfer letters to people who have received their immigration status, requiring them to move to other accommodation centres around the country. This is a significant barrier to integration, as those who have established relationships in their local communities – including with schools, voluntary organisations, medical providers and employers – are at risk of being moved to a location considerably distant from these support networks, and in some cases to tented accommodation. Anecdotal evidence suggests that people who receive transfer requests are more likely to become homeless.

48. Irish Examiner. Over 5,600 refugees with right-to-remain still in direct provision. 30 October 2023. Available at: <https://www.irishexaminer.com/news/arid-41258995.html>

49. Maynooth University. Ireland's Hidden Homelessness Crisis. Hearne R., McSweeney K.. November 2023. Available at: www.maynoothuniversity.ie/applied-social-studies/news/report-ireland-s-hidden-homelessness-crisis

Recommendations:

- Medium and long-term planning is required in order to ensure homelessness does not become a recurring issue for international protection applicants and those who have gained immigration status in Ireland.
- Built-in integration supports must be provided for those in reception centres.
- The practice of transferring people who have established roots in a particular community should be stopped.
- Practical supports should be put in place to facilitate the provision of move-on accommodation for those with immigration status.
- Information on housing rights and supports should be made available in multiple languages, in accessible formats.

29. Social integration of migrants is crucial to Irish society's wellbeing as a whole. It is imperative that collaboration is supported between stakeholders across the public, private and third sectors, in order to combat the development of silos between actors that can facilitate migrant integration.

Socially divisive activity such as racist and anti-immigrant sentiment is a major barrier to integration, and is perpetuated by community leaders and media outlets, online and in-person. Media outlets can be important contributors to public perception of migrants, particularly where there is negative, prejudiced reporting on migration issues. (50) It is

50. International Journal of Critical Psychology. 'Fear, Framing and Foreigners: The Othering of Immigrants in the Irish Print Media'. Breen MJ., Haynes A., Devereux E. 2006. 16, 100-121. Available at: <http://hdl.handle.net/10395/1350>

crucial that media professionals are aware of problematic reporting, the impact that it has on the perceptions of local and migrant communities, and the knock-on effect on social integration. (51)

Figures from An Garda Síochána showed a 29% increase in reported hate crimes and incidents in Ireland in 2022. (52) Hate crimes are ‘message’ crimes – they tell people who are members of minoritised communities that they are not safe. (53) These acts have a much broader impact on integration, outside of the victim and perpetrator of the crime. Effective legislation is needed in Ireland to ensure that hate crimes are managed consistently in the criminal justice system. In order to ensure social integration, migrant and local communities in Ireland need to know that hate crime and extreme hate speech are not accepted.

The cause of hate crime and other socially divisive activity must also be addressed through cross-community education and responsible political leadership. It is imperative that communities targeted by

51. Perceptions. Policy Brief – November 2022 – Improving mainstream media reporting on migration. November 2022. Breitegger M, Bertel D. Available at: www.perceptions.eu/wp-content/uploads/2022/12/PERCEPTIONS-Policy-Brief-17EN-1.0.pdf

52. An Garda Síochána. An Garda Síochána – 2022 Hate Crime Data and Related Discriminatory Motives. 22 March 2023. Available at: www.garda.ie/en/about-us/our-departments/office-of-corporate-communications/press-releases/2023/march/an-garda-siochana-2022-hate-crime-data-and-related-discriminatory-motives.html

53. American Psychological Association. “Message” crimes: Understanding the community impacts of bias crime. Stotzer R., Sabagala A. 2020. In R. J. Sternberg (Ed.), Perspectives on hate: How it originates, develops, manifests, and spreads, 251–276. Available at: <https://doi.org/10.1037/0000180-012>

far-right strategists are supported with knowledge of far-right tactics and false narratives. Public representatives need to take strong stances against incidents of hate which target minority populations in Ireland - this includes in public policy development, public statements and any media engagement, as well as in private, direct engagement with members of their communities. Effective, targeted integration initiatives can be further supported through improved victim supports, monitoring, reporting and data collection. Migrant communities also need access to public spaces and activities which promote cross-cultural cohesion.

Recommendations:

- Additional funding should be allocated for cultural exchange programmes and community education on the strategies of far-right agitators.
- Additional funding should be allocated to grassroots and voluntary groups promoting social cohesion at local level. These grants should be available on a multi-annual basis to allow organisations to develop medium to long-term objectives.
- Training should be available to all media professionals to facilitate sensitive reporting regarding migration, race, religion and ethnicity.
- Information on community events and integration supports should be made available to migrants in multiple languages, in accessible formats.
- The Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022 should be supported through training for all relevant public service bodies.

30. Political participation and representation of migrant populations in Ireland is severely lacking. Migrant populations need to be provided with targeted information regarding their political and civic rights in Ireland. Nasc has campaigned for many years to promote migrant political participation through voter registration drives, hustings and information sharing events, including the successful campaign for the inclusion of voter registration forms in Citizenship Packs. (54) Nasc welcomes the new registration system on the Check The Register website, which has increased accessibility by facilitating online registration at any time. (55)

Anonymous registration could provide an important protective measure for international protection applicants. The publication of addresses in the register would allow for anti-immigrant activists to identify those living in accommodation centres, and potentially inflict intimidation or violence on those individuals who have registered to vote. The anonymous registration facility for voting in Ireland requires a sign-off from a GP or a member of Garda Síochána. It is unclear whether general fears about safety, for those living in international protection accommodation, would be sufficient. We are concerned that in the current environment, this may be a barrier to registration for international protection applicants.

54. Nasc, the Migrant and Refugee Rights Centre. Citizenship & Political Participation. Available at: <https://nascireland.org/campaigns/citizenship-political-participation>

55. Government of Ireland. Improvements to voter registration process launched today as new Check the Register campaign begins. 6 November 2022. Available at: www.gov.ie/en/press-release/a24a6-improvements-to-voter-registration-process-launched-today-as-new-check-the-register-campaign-begins/

Migrant representation in Irish politics is very low, which contributes to a dismissal of migrant integration needs in Government policy and society. Irish political parties generally do not have proactive strategies to increase migrants' voting registration and election candidacies. (56) The importance of public office mentoring programmes for ethnic minorities, and initiatives to support selection of ethnic minority candidates, was highlighted in the Government's National Action Plan Against Racism, published in 2023. (57)

Ethnic minority women are especially underrepresented in Irish politics. The Programme for Government published in 2020 highlights the need to support local authorities in improving gender and ethnic representation in local elections. (58) Facilitating the political participation of migrant women in elections requires initiatives which meet the needs of women in rural areas, as well as those with childcare responsibilities. Support for aspiring and selected candidates must also respond to the risk of intersectional harassment - ethnic minority candidates in Ireland have

56. Immigrant Council of Ireland. The Experience of Migrant Candidates in the 2019 Local Elections Migrant Electoral Empowerment Report. Lima V. 1 December 2019. Available at: www.immigrantcouncil.ie/sites/default/files/2021-09/Migrant%20candidates%20experience_LA2019.pdf

57. Government of Ireland: Department of Children, Equality, Disability, Integration and Youth. National Action Plan Against Racism. 21 March 2023. Available at: www.gov.ie/pdf/?file=https://assets.gov.ie/250147/ff9dea67-ef0a-413e-9905-7246b5432737.pdf#page=nul

58. Government of Ireland: Department of An Taoiseach. Programme for Government: Our Shared Future. 29 October 2020. Available at: www.gov.ie/en/publication/7e05d-programme-for-government-our-shared-future/

experienced sexual and racist harassment while canvassing in-person, as well as on social media and by phone. (59)

Recommendations:

- Representation and participation of migrants in political processes needs to be supported through public relations campaigns with targeted, accessible communication in multiple languages.
- Anonymity should be protected for voting registration, and made more accessible for migrants.
- Increased funding is needed for local community and voluntary organisations to facilitate opportunities for aspiring policymakers among migrant populations in Ireland.
- Political parties in Ireland should be supported in expanding their recruitment networks and providing adequate supports for migrant election candidates.
- Initiatives to support migrant women's political participation should be introduced, such as gender and ethnic quotas.

59. National Women's Council of Ireland. Women Beyond the Dáil: More Women in Local Government. 14 November 2019. Available at:

www.nwci.ie/index.php/learn/publication/women_beyond_the_dail_more_women_in_local_government