

# Submission to the Electoral Commission

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**Nasc**

Migrant & Refugee Rights

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**Rialtas na hÉireann**  
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# **Submission by Nasc, Migrant and Refugee Rights Centre to the Electoral Commission regarding the Commission's Draft Research Programme.**

## **1. About us:**

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.

**2. The proposed research strands** include (A) longitudinal research and data collection; (B) electoral law, electoral systems and electoral infrastructure; (C) integrity of electoral events; (D) education, public engagement and inclusion; and (E) curiosity-driven research. Nasc welcomes the Commission's prioritisation of these issues, and is particularly interested in the opportunities within Strand B and Strand D.

**Strand B:** By prioritising research on electoral law, electoral systems and electoral infrastructure, An Coimisiún has an opportunity to assess the barriers to political participation faced by migrants and refugees.

These barriers include:

**Issues with data sharing, privacy and vulnerable groups:**

Currently, an individual has to opt out of being included in the edited register, which can be shared for other purposes such as direct marketing use by commercial or other organisations. We are concerned that there is a lack of public awareness on how information on the edited register is released. We would prefer for inclusion on the edited register to be opt in rather than opt out. Nasc supports individuals who are experiencing or have experienced domestic violence and abuse, the majority of whom are women. The issue of privacy is a concern for everyone, but in particular for those that are fleeing violence. Unclear data sharing policies, or allowing for further data sharing in the future, could deter individuals from registering in the first place.

Nasc also has concerns regarding the protection of the identities and location of international protection applicants. Section 26 of the International Protection Act 2015, makes it an offence to publish details which might identify the person as an applicant for international protection without their consent. (1) By publishing the person's name and linking it to a known direct provision centre, it is identifying them as someone with a protection application. This might be resolved by making it clear that international protection applicants can apply to register as anonymous electors. We are concerned that in the current environment international protection applicants may be deterred from registration if they believe that their details may become available to anti-migration campaigners.

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1. Irish Statute Book. International Protection Act 2015. Available at:  
<https://www.irishstatutebook.ie/eli/2015/act/66/section/26/enacted/en/html#sec26>

**Documentation requirements for identity verification:** Documentary requirements set for identity verification must be balanced with the realities and barriers that some people face when trying to access identity documents. Having overly strict identity requirements may exclude marginalised sectors of the population, including asylum-seekers. The causes of displacement, such as fleeing due to conflict or persecution, can greatly impact access to identity documents for those that are in the protection system. In the cases of persons that do hold identity documents from their country of origin, they are required to submit them to the International Protection Office in support of their application for protection. The refugee status determination procedure is often a lengthy process and flexibility is required in the verification of the identity for asylum seekers to ensure that they can exercise their right to participate in the democratic process and register and vote in local elections while they are awaiting the outcome of their application for protection.

**Strand D** will prioritise education, public engagement and inclusion, which allows An Coimisiún to raise public awareness of voting rights. A recurring issue in our work to promote migrant political participation is the lack of awareness on the right to vote by members of migrant communities. It is crucial that accessible information and voting registration opportunities are provided to those living in congregated or institutional settings such as refuges, family hubs and other types of homeless accommodation, direct provision centres, etc.

Voter registration could be facilitated at large public events such as citizenship ceremonies. Presently we understand that information on registering to vote is not made available in the packs provided to new citizens on their naturalisation. Over 13,000 people received their Irish citizenship in 2023, with six ceremonies hosted to mark the occasion. These events offer an excellent opportunity to increase political participation by providing on-site electoral registration facilities and information on the voting system in Ireland.