

## Q2 2017 REVIEW OF HIGHLY SKILLED AND INELIGIBLE LISTS OF EMPLOYMENTS

### SUBMISSION FORM

*The information you provide below is important to the review process. You are encouraged to be as specific and detailed as possible when providing information.*

#### 1. Date of submission

*27 April 2017*

#### 2. Who is this submission on behalf of?

*a. Provide name of individual, firm or organisation*

**Nasc, The Irish Immigrant Support Centre**

*b. Provide contact details*

**Jennifer DeWan, Campaigns and Communications Manager, [jennifer@nascireland.org](mailto:jennifer@nascireland.org)  
Nasc, Ferry Lane, Off Dominick Street, Cork City**

*c. Briefly describe the main activity and characteristics of the organisation making the submission [not required for Government Department/State Bodies]*

**Nasc, the Irish Immigrant Support Centre, is a non-governmental organisation working for an integrated society based on the principles of human rights, social justice and equality. Nasc (which is the Irish word for link) works to link migrants to their rights through protecting human rights, promoting integration and campaigning for change. Nasc was founded in 2000 in response to the rapid rise in the number of asylum seekers and migrant workers moving to the city of Cork. It is the only NGO offering legal information and advocacy services to immigrants in Ireland's second city. Nasc's legal team assist some 1,000 immigrants annually in navigating Ireland's protection, immigration and naturalisation systems.**

**3. What occupation does this submission refer to?**

a. *Occupation job title*

n/a

b. *What status do you propose for this occupation?*

- For inclusion on HSEOL
- For removal from HSEOL
- For inclusion on ICEL
- For removal from ICEL

\*Tick one option as appropriate

**4. Reason for proposed change of status:**

n/a

**5. Consultation**

Have you consulted with, or are you aware if there has been any consultation with, your industry representative body on this issue? [Please complete if you are a private individual.]

n/a

## Training and industry initiatives

The Department must be satisfied that the industry is committed to fully utilising the domestic/EEA labour market before industry considers employing non-EEA nationals. Your submission should include information on any demonstrated industry commitment to training and industry initiatives to enhance domestic/EEA recruitment that you are aware of, specifically:

*a. To your knowledge, what steps are being taken by industry and employers in the short term and long term to address this shortage?*

*n/a*

*b. Are you aware of initiatives by the sector to upskill the resident population or plans by industry representatives to engage with education and training providers in ensuring that the sector's skills needs are met?*

*n/a*

*c. Are you aware of the education and training initiatives and programmes that currently exist? If yes, why is the graduate output not sufficient to meet your sector's needs eg quality of graduates? quantity? geographic mobility?*

*n/a*

*d. Does your industry have an agreed skills plan? ie a plan for upskilling the current workforce and or potential workforce? If yes, describe the expected outcomes of the plan. If no, what plans are in place to develop one and within what timeframe?*

*n/a*

*e. Are you aware of measures taken by the sector to avail of the Department of Social Protection's Employer Engagement Team to source qualified job seekers? If yes, please explain. Also please explain efforts made to recruit qualified EEA job seekers using for example Eures, Jobs Fairs, industry associations abroad, Jobs Ireland, etc.*

*n/a*

## 6. Labour market conditions

The Department must be satisfied that industry is committed to meeting its labour needs from the resident and EEA labour market, and that recourse to the recruitment of foreign nationals is only undertaken where a genuine skills shortage exists, rather than other factors relating to the conditions of the employment which should be addressed through means other than economic migration. Please provide any general information that you feel is pertinent in relation to your industry, eg. wage ranges for occupations where shortages occur, whether the perceived shortage is general to the occupation or only occurs at specific levels of experience, or for very specific expertise.

**We would like to bring attention to the effect that current employment permit policy indirectly discriminates against women. While the DJEI employment permit policies may not directly discriminate women, their gender neutrality has a negative effect on women's access to legal immigration channels and to women's equal access to the labour market.**

**The Irish government recognises the existing gender pay gap in Ireland being 14.4% for 2012, the latest estimate.<sup>1</sup> Current eligibility criteria for employment permit applications set a minimum annual remuneration of €30,000 per year, without acknowledging the impact that the gender pay gap has on women's employment prospects. Moreover, male dominated industries, occupations and positions are overrepresented in the list of Highly Skilled Occupations List.**

**The effect of current employment permit policy on migrant women's access to the Irish employment market is evidenced by the DJEI's own statistics. The DJEI has provided Nasc, upon request, the statistics of employment permits applied for, segregated by year, type of permit and gender. Of all applications for Critical Skills Employment Permits (CSEP) in 2016, out of a total of 3499 applications, 68% of applicants were men. Most CSEP and Green Card permits applicants are men, representing 70% of total applicants in 2015, 76% in 2014, 79% in 2013, 75% in 2012, 70% in 2011 and 64% in 2010.<sup>2</sup>**

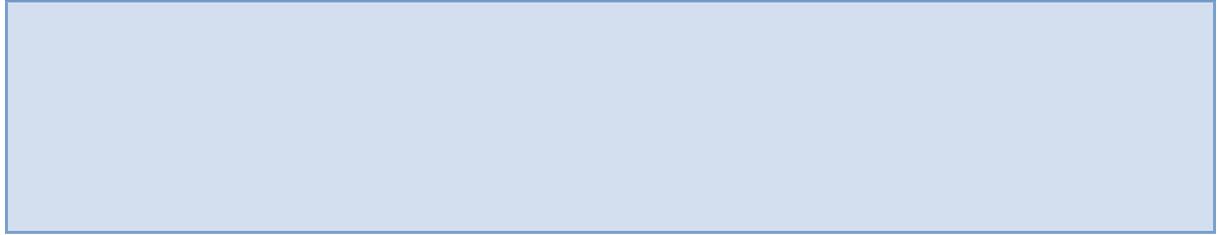
**It is submitted that as part of the Irish State's international and domestic obligations, the DJEI should take into consideration the effects work permit policies have on migrant women's equal access to the job market, and should address these effects through appropriate measures.**

## 7. Wider economic factors

Wider economic factors may have an influence on occupational shortages. For example are there reasons associated with productivity, innovation or competitiveness that you think the Department should take into consideration? Please provide evidence.

<sup>1</sup> See CEDAW – Response to the List of Issues and Questions prior to reporting, available at [http://www.justice.ie/en/JELR/CEDAW\\_REPORT\\_September\\_2016.pdf/Files/CEDAW\\_REPORT\\_September\\_2016.pdf](http://www.justice.ie/en/JELR/CEDAW_REPORT_September_2016.pdf/Files/CEDAW_REPORT_September_2016.pdf). CEDAW stands for the UN Convention of Elimination of all forms of Discrimination against Women, of which Ireland is a State party.

<sup>2</sup> Note that in the statistics provided by the DJEI, the only numbers disaggregated by sex were those corresponding to permit applications, not those granted, refused or withdrawn.



*Thank you for participating in the review.*

*Please note that the information provided on this form will be shared with relevant Government Departments and State organisations. This is to promote an integrated approach to addressing skills shortages in the State.*