

## NATIONAL STRATEGY FOR MIGRANT INTEGRATION

### Citizens Information Board Submission

#### Introduction

The Citizens Information Board (CIB) welcomes this opportunity to make a submission to the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) in response to the consultation on the development of a new national strategy for migrant integration, the successor to the 2017 - 2021 strategy, *“The Migrant Integration Strategy: A Blueprint for the Future”*.<sup>1</sup> We acknowledge the changed strategic context within which this new strategy will be shaped which will require a strong and proactive integrative focus across a wide range of policy domains. We recognise that the success of the measures in the new strategy will only be effective if the integration agenda is reflected and prioritised by all departments and agencies in the allocation of budgets.

CIB, which is funded by and comes within the remit of the Department of Social Protection, is the national agency responsible for supporting the provision of information, advice and advocacy on social and public services through [citizensinformation.ie](http://citizensinformation.ie) and through CIB-funded services – Citizens Information Services (CISs), the Citizens Information Phone Service (CIPS), Money Advice and Budgeting Services (MABS), the National Advocacy Service (NAS) for people with disabilities and the Sign Language Interpreting Service (SLIS). CIB also collaborates and engages with a range of specialist organisations that support and represent the interests of disadvantaged sections of the population, including the Immigration Council of Ireland, the Free Legal Advice Centres and Threshold.

This submission is based on the feedback received from CISs and CIPS in their work, as they provide independent information, advice, and advocacy services to hundreds of thousands of people annually. We receive caller and query data and policy feedback from these services, which provides unique evidence-based information on the difficulties encountered by people on issues relating to income supports, social protection, housing and health services, employment rights enforcement, indebtedness, and social inclusion.

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<sup>1</sup> [Migrant Integration Strategy: A Blueprint for the Future](#)

During 2022, Citizens Information Services (CISs) dealt with almost 788,000 queries, from over 394,000 callers. Some 21% of callers (where country of origin is noted)<sup>2</sup> were recorded as being migrants. This is significantly higher than the proportion of migrants in the total Irish population, recorded at 12% as per Census 2022 data.<sup>3</sup>

From a service provision perspective, CIB also funds the Immigrant Council of Ireland (ICI) to provide a specialist back-up service to CISs and CIPS on complex queries relating to immigration. In addition, several CISs specifically engage with migrant communities through outreach services and many services have recruited migrants and people from diverse ethnic backgrounds as members of their service delivery teams.

Given this level of service, CIB has a strong and ongoing interest in the policy environment in relation to immigration, integration, and inclusion, as it impacts the information needs of service users and the delivery of our funded services. In addition to this, in 2021 CIB published research which investigated the particular information needs of migrants—in more vulnerable circumstances [“Meeting the Information Needs of Migrants in Vulnerable Situations: A Citizens Information Perspective”](#).

The development of this Strategy at this time is particularly significant as a range of broader policy challenges and opportunities converge - including, at a domestic level, the recent publication of a new National Action Plan against Racism for Ireland (March 2023), slow progress on the reforms as laid out in the White Paper on the international protection process (2021) and the successful roll-out of the scheme for the regularisation of undocumented migrants in 2022. Taken in the context of a number of turbulent years globally - with Brexit, the Covid pandemic and the Russian invasion of Ukraine having a significant impact on migration patterns and trends both nationally and internationally - in addition to an increasing number of international protection applicants and the greater prominence of far right actors in promoting anti-migrant sentiment in this country, it would seem that a renewed focus on the integration of migrants in Irish society is essential at this time.

It is acknowledged that integration is a ‘two-way street’, and, by necessity, adjustments (and mutual accommodation) are required by both migrants and residents in host communities.<sup>4</sup> A new - and renewed - statement of policy intent in the form of this strategy must be capable of responding to the current and future challenges which we are likely to experience in an increasingly diverse Irish society. The new strategy must seek to: -

- Recognise and build on the positive achievements to date - as highlighted most recently in the 2022 Monitoring Report on Integration<sup>5</sup> - which notes good integration practice at national and local level. In a comparative context, the Migrant Integration

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<sup>2</sup> Country of origin was recorded for over 60% of callers in 2022.

<sup>3</sup> [Census 2022 Profile 5 - Diversity, Migration, Ethnicity, Irish Travellers & Religion - CSO - Central Statistics Office](#)

<sup>4</sup> [Common basic principles for immigrant integration policy in the EU, 2004.](#)

<sup>5</sup> [Monitoring Report on Integration 2022, ESRI/ DCEDIY](#)

Policy Index 2020 (MIPEX)<sup>6</sup> ranked Ireland six amongst 52 countries in relation to migrant integration, noting some positive indicators (including in the areas of health, anti-discrimination, and political participation), but poorly on others such as education, labour market mobility and family reunification.

- Identify the multi-faceted needs of migrants and set out to address the deficits in our response in meeting these needs, particularly for those who are more vulnerable within migrant communities<sup>7</sup> - including non-EU migrants, migrants' spouses, partners and families, undocumented migrants, migrants who speak little or no English, those who are members of 'visible minorities' (Black and Asian migrants), migrants who live in the private rented sector, and those leaving the Direct Provision system;
- Recognise the wealth of skills and experience of migrants (particularly so in the context of a domestic economy operating at full employment) and seek to make the best use of these skills, to maximize integration outcomes for migrants and their host communities.
- Reflect the core components of active citizenship fostering feelings of belonging and connection in the broad national sense, and in the everyday sense of identifying with the community locally.
- Acknowledge the challenges that are presented by discrimination and racism and reflect the key actions to combat these attitudes and actions, as articulated in the National Action Plan Against Racism<sup>8</sup> and in the pending Hate Crime legislation.
- Provide for a range of funding mechanisms to promote and develop positive integration outcomes at national and local level.

### CIS feedback

At the outset it is important to recognise the work that has been done in recent years to create a social and cultural context where non-Irish born people have become integrated into Irish society. The lead role played by the *Migrant Integration Strategy: A Blueprint for the Future (2017 - 2021)* needs to be acknowledged here. These positive 'integration outcomes' are not just theoretical and are evident in the daily lives of many Irish citizens across the country who experience the reality of non-Irish born friends, neighbours, spouses, classmates, workmates, in-laws, and teammates. Many migrants are well integrated at both local and national level and live in communities where there is relatively little focus on

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<sup>6</sup> [Migrant Integration Policy Index 2020](#)

<sup>7</sup> [Meeting the information needs of migrants in vulnerable situations, CIB, 2021](#)

<sup>8</sup> [National Action Plan Against Racism 2023, DCEDIY](#)

ethnicity, colour, or race. However, as reported in the Monitoring Report on Integration 2022, there continue to be difficulties for many non-Irish born people in their attempts to become an accepted part of Irish society - an outcome and process which defines integration. Some find it difficult to access basic information, to find work or somewhere to live, to make friends, to access health care when required or to join sports clubs or community groups. Some experience discrimination and racism.

The feedback that CIB receives from CISs from their daily interactions with migrants is reflective of particular 'pinch points' for many who are seeking information, advice, and advocacy in Citizens Information Centres. This would seem to be particularly true in the areas of employment, housing, education, and acquiring citizenship. While migrants seek assistance related to the broad range of social and public services to the same extent as the general population, it should be remembered that their information needs are likely to be more complex and focussed, given that they will have to fulfil different legal requirements to enter, live and work in Ireland.

As noted previously, 21% of the 394,000 callers to CISs in 2022 (where country of origin is noted) were recorded as being migrants - a proportion that is significantly higher than that recorded in the total Irish population (i.e., 12% as per Census 2022 data).

This over-representation of migrants amongst CIS clientele is reflective of the key role that information provision has to play in helping to achieve integration, in that it enhances people's access to services and entitlements - with integration being the natural by-product of such access. The provision of the right information, in a timely and accessible manner can also assist migrants to assert their rights and will serve to promote equality and fairness in access to services.

### Role of information provision

The vital role that information plays in the lives of migrants was acutely observed following the arrival of many thousands of Ukrainians to Ireland after the Russian invasion in March 2022. Initially, CISs provided advice and assistance in the Government-supported information hubs when they were established at key arrival points. Now - some 18 months into the conflict – CISs respond to the information and advocacy needs of Ukrainian people through their provision of targeted and mainstream services at local level.

This is in addition to delivering information, advice, and advocacy services to a diverse range of migrants from other countries.

Overall, our data indicates that during 2022, callers to CISs came from 189 different countries - with the Top Five 'Countries of Origin' for non-Irish born callers during 2022 recorded as Ukraine, Poland, Nigeria, United Kingdom, and Romania. Amongst these 52,000 callers (with 117,000 queries), over 30% were identified by information providers as having specific needs, with language difficulties being the key one identified.

The particular focus of migrants' queries within our funded information services can help to illustrate the most commonly experienced difficulties for migrants in accessing social and public services - with the top five main query categories amongst migrants in 2022 recorded as *Social Welfare, Moving Country, Housing, Health, and Employment*. The specific payments or benefits that were most queried by migrants during 2022 were:

- Applying for Local Authority/ Social Housing,
- Medical Card,
- Jobseekers Allowance,
- Disability Allowance,
- Basic Social Welfare Allowance,
- Housing Assistance Payment,
- Working Family Payment,
- Child Benefit.

These caller and query insights gleaned from the daily work within CISs show us that, not surprisingly, accessing income support, housing and health services are central in the lives of migrants as they seek to take up residence in Ireland and integrate into a different society and culture. The feedback from our funded services tells us that some migrants will lack the English language skills required to access the information they need independently, and many will certainly lack the general knowledge of their rights and entitlements in Ireland that a long-term resident would have accumulated. Consequently, migrants' information needs are likely to be of a different order and scale than those of the general population and the extent to which these information needs are being met will significantly impact on their ability to integrate and access services in their local community.

In some instances, while quality information may exist, the ability of migrants to access information and supports can be limited because of language difficulties, poor signposting/promotion, or inadequate referral processes. In addition, some migrants' capacity to acquire information may be diminished by their personal circumstances and histories. For example, some people may be mistrustful of governmental institutions and may, therefore, be reluctant to approach service providers and "official" information providers.

In the broadest sense, we must recognise that equality of access to information is a key element and enabler of integration. Consequently, the new integration strategy will need to recognise the importance of the proactive provision of integrated information and embed this across the range of strategic actions that will be laid out in the strategy. Key actions that underpin the provision of quality information should include the availability of specific elements in language-appropriate formats, with clear signposting of interpreting services and intercultural awareness training for information providers. Of importance here also is the array of established local initiatives across the country that have been developed over years by local authorities, the HSE, Area Partnerships, CISs, and other NGOs as part of their strategic

approach to the promotion of integration at local level. Any new approaches to meeting the information needs of immigrants should build on existing networks and initiatives already in place.

### Day-to-day challenges with integration

Central to any assessment of the success of integration policies in Ireland is the question of whether there exist barriers to migrants' full participation in society based on status, country of origin, race, ethnicity, educational achievement, or cultural background. We note the identification of six key areas or markers within the consultation survey for this strategy that focus attention on the areas where migrants in Ireland are likely to experience challenges or barriers to integration - specifically, employment, social life, political/public representation, education, housing, and access to public services.

These key markers provide a day-to-day context within which integration takes place and many of them are reflected in the 'pinch points' that were highlighted previously in the discussion of the experience of CISs in dealing with migrants - specifically in the areas of accessing housing, health services, employment, education, and acquiring citizenship.

### Housing

We welcome the inclusion of housing in the development of this new strategy, particularly in the context of the ongoing housing crisis, coupled with the fact that migrant housing and homelessness were not addressed in the actions in the Migrant Integration Strategy 2017 - 2021.

Given the extent of the housing difficulties within the country, the experiences of migrants are reflective of the difficulties for many Irish-born people in finding suitable and affordable housing. Notwithstanding this, there is much evidence of an over-representation of migrants in many of the key indicators relating to housing need. And within the context of this submission, the extent to which affordable, accessible, and appropriate housing is vital to supporting the social inclusion and integration of migrants cannot be over-stated.

The importance of housing as a concern for migrants (in particular, social housing and rental supports) is evidenced in the caller and query data from CISs from 2022, which shows us that Applying for Local Authority/ Social Housing and the Housing Assistance Payment feature highly on the queries from migrant callers.

The ESRI Monitoring Report on Integration 2022 found that housing is now a priority issue for migrant integration as migrants are disproportionately concentrated in private rented accommodation and are facing affordability challenges. Migrants are less likely to own their home than the Irish-born population (43% vs 77% respectively) and face more issues relating to housing affordability, with 29% of migrants spending more than 30% of their income on housing (compared to 8% of the Irish-born population).

The experiences of migrants, as highlighted by CISs in their efforts to assist them, evidences the significant challenges that many face on a day-to-day basis in accessing housing - with particular and persistent difficulties in the following areas (as laid out in the consultation survey): -

- Finding easy-to-understand information on housing rights and supports.
- Communicating with landlords, estate agents etc.
- Accessing affordable accommodation.
- Facing issues relating to housing conditions (e.g., overcrowding, low quality accommodation).
- Accessing suitable accommodation for their requirements (e.g., size, location).
- Facing housing insecurity (e.g., risk of eviction).

CIB research published in 2021 found that migrants are particularly vulnerable to housing problems due to their weak position within the labour force, discrimination based on race or ethnicity, their over-reliance on private-rented housing and a lack of knowledge of their housing rights (and some reluctance to assert these rights) - all of which are compounded by language difficulties and lack of a family or local support network. These key drivers mean that migrants are much more likely to live in substandard and overcrowded accommodation than Irish-born people and that some migrant groups are more likely to be over-represented in the homeless population. The research highlighted that woman, families with children - particularly lone parents and students - and non-EU citizens are the most vulnerable sections of the migrant population in the housing system and therefore at greatest risk of homelessness.

Given the reliance on the private-rented sector for housing, it is not surprising that queries in relation to social housing and rental supports featured in the top ten query levels for migrants during 2022 - particularly in relation to '*Applying for Local Authority/ Social Housing*' and the '*Housing Assistance Payment (HAP)*'. The issues raised in these queries relate to the broader concerns with the availability of quality, affordable housing options - in common with many Irish-born people who are seeking housing. In addition, specific difficulties were highlighted in relation to migrants' housing needs in the context of trying to establish their eligibility for social housing, with the interpretation and inconsistent application of the habitual residence condition (HRC) causing difficulties for many.

The role of Local Authorities in providing support to migrants in respect of the application and delivery of social housing regulations is noted as key here, as is the vital role that information, advice and advocacy services play in enabling migrants to negotiate the housing system in Ireland.

There are also specific difficulties in accessing housing for those migrants who have been living in the Direct Provision system and are granted leave to remain in Ireland or refugee status. It is estimated that there are over 5,000 people living in Direct Provision who have legal permission to live in Ireland. In theory, these people can move out but the reality for most is that they cannot leave the accommodation provided due to the acute lack of housing available to them - with homeless services being the only option for many.

While ‘Housing for All’ does reference the role of Local Authorities in relation to the provision of “housing and supports to facilitate community integration for Refugees” (in the context of the White Paper), there are no explicit measures included that aim to address the specific difficulties that exist for migrants who are seeking housing.

Beyond the issue of housing, it is relevant here that the previous migrant integration strategy excluded international protection applicants from its remit (with only one reference to ensuring that “refugees and asylum seekers have access to youth services...”). This has had implications for the way in which many NGOs operating in the area have been able to support the integration of international protection applicants, with NASC (Migrant & Refugee Rights Centre) highlighting how this exclusion has “undermined the resources available to facilitate international protection applicants to integrate into Irish society”.<sup>9</sup> CIB is of the view that the inclusion of international protection applicants and their needs in the new strategy should be considered.

### Accessing public services

Many migrants who come to Ireland are well educated, highly mobile and in employment that matches their qualifications. However, for many others this is not the case, and they are more vulnerable to poverty and social exclusion than people born in Ireland. The ESRI Monitoring Report on Integration 2022 found that the migrant population had a lower median annual net income than the Irish-born population and higher ‘at-risk of poverty’, deprivation and consistent poverty rates - with non-EU migrants being particularly disadvantaged. In such instances, the ability of migrants to access public services - particularly income support - and their experiences in using them, is a key element of integration. From an income support perspective, data from CISs during 2022 shows us that the particular DSP benefits that were most queried by migrants were Jobseekers Allowance, Disability Allowance, Basic Social Welfare Allowance, Working Family Payment, and Child Benefit.

The ESRI Monitoring Report on Integration 2022 states that “while, in principle, many migrants are entitled to various social-welfare payments, in practice, national administrative rules lead to differing levels of access” - with the key area of difficulty for migrants in accessing income support (as noted previously with regard to accessing housing supports) being the application of the habitual residence condition (HRC) for non-Irish born applicants who are seeking social assistance payments, and Child Benefit. The CIB research on the information needs of vulnerable migrants highlighted how inaccurate information can impact on the ability of migrants to access to their rights and entitlements - with specific reference to inconsistent and/or incorrect advice regarding the HRC as being “a common problem”. Services reported that they encounter EU migrants who are misinformed about the necessity to meet the HRC, particularly in relation to family payments and the Basic Supplementary Welfare Allowance payment. Concerns about the length and complexity of the HRC application form were also raised.

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<sup>9</sup> [NASC Submission to DCEDIY Strategic Priorities 2021 - 2023](#)



The application of the HRC legislation was explicitly referenced in the previous migrant integration strategy, with Action 21 stating that “the Department of Social Protection (DSP) will continue to take measures to ensure that the habitual residence condition (HRC) legislation is applied correctly and consistently”.<sup>10</sup> The specific measures that were actioned included the provision and updating of guidelines for decision makers within DSP, the publication of these guidelines on the website, the provision of training in HRC for relevant decision makers and the ongoing provision of advice to decision-makers, as needed. While the interim progress report<sup>11</sup> noted progress on these actions, it seems from the reports from frontline services that difficulties remain for many applicants.

Notwithstanding the fulfilment of basic eligibility criteria, it would also seem that the ability of migrants to access income supports (in addition to a range of public services) in an equal manner relative to Irish-born people is greatly dependent on their ability to access clear, appropriate, and timely information about their rights and entitlements. We have previously pointed to the central role of information provision in delivering public services at an individual level and, more broadly, the role that it plays in enabling integration and inclusion across society. The extent to which CISs are meeting a need here is reflected in the over-representation of migrants amongst client numbers, and the role of specialist NGOs operating in this area is also significant in providing expert legal and immigration supports.

In the first instance though, the primary responsibility to ensure equality of access to public services lies with the relevant government departments, agencies, and Local Authorities. The interim progress report on the previous integration strategy<sup>12</sup> found that the rate of progress recorded for several actions under the “access to public services and social inclusion theme” had been slow. The range of actions referenced under this strand included the availability of information in language-appropriate formats, the availability and promotion of interpreting facilities, the provision of training to staff on entitlements, equality, and diversity and the broader aim of monitoring the reduction of poverty and social exclusion amongst migrants.

Previous CIB research<sup>13</sup> has pointed to the importance of English language acquisition as a facilitator of integration for migrants, its role in ensuring access to social welfare and other services and avoiding or mitigating the effects of poverty and social exclusion. Clearly, migrants who do not speak English or who cannot access interpretation services are vulnerable. Improving access to interpretation services, providing information in different languages, and increasing availability and access to English language classes must be seen as central in enabling access to public services for migrants.

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<sup>10</sup> [Migrant Integration Strategy: A Blueprint for the Future](#)

<sup>11</sup> [Progress report on Migrant Integration Strategy 2017- 2020](#)

<sup>12</sup> [Progress report on Migrant Integration Strategy 2017- 2020](#)

<sup>13</sup> [Meeting the information needs of migrants in vulnerable situations, CIB, 2021](#)

## Health care

The Migrant Integration Policy Index 2020 ranked Ireland number one (jointly with New Zealand, Switzerland, and Sweden) in addressing migrant health outcomes, with the ranking being attributed, in the main, to the publication of the second National Intercultural Health Strategy in 2019.<sup>14</sup> The strategy aimed to provide a comprehensive approach to addressing the unique health and support needs experienced by HSE service users from diverse ethnic and cultural backgrounds. It sets out the importance of service user involvement in the design, delivery and evaluation of health services and includes basic information on different religions and cultures, as well as guidelines on interaction with people of faith in the context of their different practices relating to hygiene and dietary requirements. The strategy is coming to the end of its term in 2023 and is currently under-going review within the HSE National Social Inclusion Office. We look forward to the outcome of this review, to establish to extent to which the strategy has been implemented across acute and primary care settings. The review of this strategy is welcome considering the recommendation in the National Action Plan Against Racism 2023 - 2027 (NAPAR) that highlighted the impact of the Covid-19 pandemic on minority ethnic groups. The NAPAR also noted the “urgent need” for targeted mental health supports, suicide prevention, and bereavement supports for minority ethnic groups stating that “action should be taken to develop, publish, and implement” specific policies to address ethnic health differentials.

Notwithstanding the existence of this national strategy on intercultural healthcare, and the ‘ordinary residence’ concept that underpins access to healthcare in Ireland which enables access on a less restrictive basis than the HRC, there exist several barriers for migrants in accessing health services.

Data supplied by CISs to CIB highlights that medical card queries have consistently featured amongst the most queried benefits or payments with migrant clients. The key area of concern highlighted by services is the difficulty that many applicants have in applying for and renewing their cards online - with the online application presenting as a barrier to migrants who have literacy, digital literacy, or language difficulties. In addition to this, during the past year services have highlighted the difficulties for eligible medical card patients in accessing GP and dental services locally. Many of the cases provide details of patients approaching multiple medical practices in their local area (and beyond) to be met with rejections on the basis that practices are full and cannot take on any new patients. While applicants may be technically eligible for the medical card, in the absence of a GP practice that has the capacity and is willing to take them on, then eligibility is a moot point.

Other difficulties for migrants in accessing healthcare include:

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<sup>14</sup> [National Intercultural Health Strategy 2018 -2023](#)

- A lack of awareness of the need for culturally appropriate healthcare within healthcare settings and migrant experiences of racism and discrimination, as detailed by NGOs working in the area;<sup>15</sup>
- A lack of interpreting services in hospital settings and GP surgeries, resulting in communications difficulties that can compromise the delivery of a proper assessment of patients' needs. These difficulties are compounded by a lack of standards and accreditation in relation to interpreting services.

Over-and-above these specific barriers to access, NGOs operating in the area also point to deficiencies in the recording of ethnicity data within health service settings. This is a key health action in the previous integration strategy (*Action No. 50: The recording of ethnicity as part of ethnic equality monitoring across the health service will be promoted as a means of identifying unique needs of migrants and developing interventions to address these needs*) and one in which slow progress has been noted.<sup>16</sup> To provide equitable healthcare across the population, it is necessary to understand who has access to health services, what their experience is and what their health outcomes are. Currently, the data that is collected does not reflect the increased diversity of ethnicities in Ireland, with HRB funded research<sup>17</sup> highlighting that only a small proportion (14%) of the national health and social datasets examined had information about ethnicity and culture.

#### Data collection and monitoring integration

The official approach to the provision of public services to migrants is the mainstreaming of access on the same basis as Irish-born people, with additional supports being provided for specific groups based on identified need. In this context, we welcome the annual monitoring reports on integration produced jointly by the Economic Social Research Institute (ESRI) and DCEDIY. The reports use a series of indicators, based on a wide range of data, to compare the outcomes of the Irish and foreign-born population in key areas, notably in employment, education, social inclusion, and active citizenship. These reports help to identify the extent to which migrants have specific needs over-and-above the Irish-born population and can also point to areas where migrants need additional support in meeting these needs.

The 2022 monitoring report however highlights the short-comings with the current indicators as being “limited in scope and neglecting important areas of integration, such as job quality, over-education and English-language proficiency, as well as a sense of belonging, experiences of discrimination, integration into social networks, intentions to stay and identity”. The National Action Plan Against Racism 2023 lists a number of priority actions that aim to address “the significant shortcomings in our ethnic equality monitoring, data collection and use..”, with Action 4.3 prioritising the introduction of “a standardised ethnic classification (based on the Census) across all routine administrative systems, state agencies and surveys in line with

<sup>15</sup> [Joint Oireachtas Committee on Children, Equality, Disability, Integration and Youth, November 2021](#)

<sup>16</sup> [Progress report on Migrant Integration Strategy 2017- 2020](#)

<sup>17</sup> [Ethnic minorities - data can drive more equitable healthcare, HRB, 2021](#)

human rights standards, to enable ethnic equality proofing and monitoring of state policies, budgets and programming”.

CIB supports the view that there needs to be a consistent approach to the collection of ethnically disaggregated data by public service providers and others. Data on ethnicity,<sup>18</sup> which is important from both mainstreaming and targeting perspectives, is not being collected consistently by public agencies at the level required to have ethnic minorities included in the context of the planning, implementation and review of policies and practices. We would suggest that the collection of reliable data on the usage of public services by ethnicity groups is an essential component of Section 42 of the Irish Human Rights and Equality Commission Act 2014, which gives public services funded by government a “positive duty” to eliminate discrimination, promote equality of opportunity and to promote the human rights of its service users and staff. This positive duty must involve the systematic integration of an equality and human rights perspective into the everyday work of public services, which may necessitate changes to organisational cultures and working practices so that such a perspective is an integral part of the provision of services.

### Employment and Employment Rights

The previous migrant integration strategy has highlighted the essential role of employment in the context of social integration and set out a range of actions under the “Employment and pathways to work” theme. The ability of migrants to access the Irish labour market is key to ensuring their effective integration into host communities and to ensuring their positive impact on the Irish economy.

Within the specific confines of employment rates, the ESRI Monitoring Report on Integration 2022 found that the migrant employment rate (77%) was higher than that of the Irish-born rate (72%). The report also highlighted particularly positive trends for African migrants in the labour market (who have long faced disadvantages), noting an increased employment rate during the 2020 - 2022 period (from 56% to 74%).

However, under the broader measure of ‘labour market mobility’, the MIPEX index scored Ireland’s performance far below average, noting that there is much less support here than any other EU country to secure equal opportunities on the labour market. It highlighted difficulties for migrants in getting foreign qualifications recognised or in gaining new professional and language skills and noted that most MIPEX countries grant equal access to long-term residents, family, and some work migrants, while continuing to improve their recognition and targeted support.

Beyond these contrasting evaluations, the data from CISs would indicate that migrants face significant challenges in this key area of integration, some of which are reflected in the ‘labour market mobility’ issues as raised in the MIPEX report. Information services assist many

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<sup>18</sup> CIB introduced a non -mandatory ethnicity data field into its online recording system for Citizens Information Services some years ago but there are significant take-up issues in an environment where engagement with callers is within a short timeframe.

migrant workers, particularly those in the precarious and low-wage sectors of the Irish labour market, such as carers and health care assistants, workers in the farming and fishery sectors and meat processing plants, and those employed in the tourism and hospitality sector. Employment-related queries have featured within the top five query areas for migrants accessing CIS services during the past number of years and indicate difficulties for clients in the following areas (as set out in the consultation survey): -

- Understanding the Irish labour market.
- Employers recognising prior work experience and/or qualifications.
- Finding a job that matches qualifications and experience.
- Meeting language requirements.

Given that the Irish economy is currently operating at full-employment, CIB is of the view that the progression of the new Employment Permits Bill through the Houses of the Oireachtas during 2023 is welcome. This Bill should go in some way to making the existing employment permits legislation more responsive by consolidating and modernising the current legislation. It should also help to facilitate a more streamlined and flexible approach to the employment permits system that currently operates, with a key feature being the introduction of a Seasonal Employment Permit. This will enable non-EEA nationals to work in the State temporarily, typically for 6-9 months. There will also be an option for certain permit holders to transfer from one employer to another within the same sector after a specified amount of time.

Almost 40,000 employment permits were issued in 2022, which was double the number issued in 2021. As the Government continues to extend general employment permits for sectors that are experiencing skills shortages, many migrants have for some time been experiencing difficulties with the system as it currently operates. Migrant rights groups have pointed to concerns around the differing treatments of those workers recruited into essential jobs on general employment permits when compared to those workers on critical skills employment permits - with those on critical skills permits being treated much more favourably in terms of their ability to change employers and their right to bring family to join them, and in turn, their ability to work.

Skills validation and recognition of qualifications are also highlighted as key enablers in helping migrants to get relevant and meaningful work, and as being problematic for migrant workers in Ireland. Due to problems with the recognition of their qualifications, skills and work experience, many migrants end up either unemployed or underemployed, with some working in low-skilled, temporary, and badly paid jobs.

## Summary of policy considerations for new Strategy

The strategy should broadly –

- Seek to enable and guide national policy but also to encourage local government, public bodies, and wider civil society and remind all of their obligations in respect of integration measures and initiatives.
- Build on the positive achievements of its predecessor and focus particular attention on those who are vulnerable within migrant communities - including non-EU migrants, migrants' spouses, partners and families, undocumented migrants, migrants who speak little or no English, and those who are members of 'visible minorities' (Black and Asian migrants).
- Provide a policy context within which the provision of social housing for migrants is adequately addressed. The role of Local Authorities in providing support to migrants in respect of the application and delivery of social housing regulations is noted as key here.
- Reflect the particular situation of international protection applicants - those living within the Direct Provision system and those granted refugee status who are seeking to leave.
- Recognise the importance of the proactive provision of appropriate and integrated information and embed this across the range of strategic actions as articulated. All government departments have a role in providing information to ensure equal access to their services.
- Take account of the current evaluation of the National Intercultural Health Strategy and seek to reflect the vision and aims of this strategy.
- Reflect the importance of the acquisition of English language skills for migrants. In much the same way that access to information is a key element and enabler of integration, there needs to be a language component woven throughout key elements of the new strategy, given the extent to which it impacts on migrants' ability to access employment, education and further training, public services, meaningful participation in social and community life and political representation.
- Embed recording ethnicity as part of ethnic equality monitoring and data collection across all public services and agencies, as a means of identifying the unique needs of migrants and developing interventions to address these needs.

- Recognise the impact of racism, the role that the state has to play in combatting this and reflect the vision and aims of the recently published National Action Plan Against Racism.

In the context of this multi-action, cross-departmental strategy, the new strategy should provide for ongoing external monitoring of progress on an annual basis.