

Race Equality Unit
The Executive Office
Castle Buildings
Stormont Estate
Belfast BT4 3SG

21 February 2022

By e-mail: Race.Equality@executiveoffice-ni.gov.uk

Dear Colleague,

Re: Draft Refugee Integration Strategy for Northern Ireland 2022-2027

Children in Northern Ireland ([CiNI](#)) is the regional umbrella organisation for the children's sector providing policy, information, training and participation support to members. Our vision is to create a society where children are valued, treated fairly and can flourish. To achieve this, we campaign for changes to policy and practice to improve the wellbeing of children. We also provide advice and support directly to parents and carers through [Parentline](#) - our free, confidential and multi-channel regional parenting support helpline.

CiNI welcomes the opportunity to respond to the draft Refugee Integration Strategy and we commend The Executive Office's (TEO) continuing commitment to vulnerable children and families who seek sanctuary and support to rebuild their lives. In this short submission, we draw attention to a number of areas for consideration.

Comments

- In terms of the operating context set out in section 4, the Strategy also sits within the context of the United Nations Convention on the Rights of the Child (UNCRC); the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD); the Executive's Programme for Government; the Children's Services Co-operation Act (Northern Ireland) 2015; and the Children (Northern Ireland) Order 1995. This content should be included, ideally in a standalone section on children and young people.
- Within this section, there should be a clear reference to, and application of, the requirement under Article 3 of the UNCRC and Article 7 of the UNCRPD that the

best interests of the child should be a primary consideration in all decision-making processes which may affect children and young people, across all government departments.

- The policy should acknowledge how the Northern Ireland Executive is delivering the recommendations of the Committee on the Rights of the Child in their 2016 [Concluding Observations](#),¹ in respect of the protection and treatment of migrant, asylum seeking and refugee children and young people.
- The policy should acknowledge the statutory obligations provided in the [Children's Services Co-operation Act \(Northern Ireland\) 2015 \(the Act\)](#). It should clearly set out how its actions and impact will contribute to the eight wellbeing² outcomes in the [Children and Young People's Strategy](#) - the overarching strategic framework for the wellbeing of children and young people.
- Much of the detail relating to accountability, monitoring and reporting arrangements needs to be included in the final Strategy; and it should be accompanied with a costed delivery plan with resourcing for implementation. Progress needs to be assessed and outcomes reported, in line with the Programme for Government's outcomes-based concept. This, in turn, will allow Departments to better understand how effective their interventions are and if outcomes have been achieved, in line with the Act and Children and Young People's outcomes framework. The Strategy budgetary allocations should be monitored, this goes beyond reporting on how funding is spent, but also the outcomes to which it contributed.
- The dearth of data is a continuing theme. We note that, *"due to the scarcity of routinely collected administrative data on refugees and asylum seekers it will be difficult to robustly evidence / quantify the impact this Strategy will have."* (p54) Accurate data is imperative to inform the design, delivery and monitoring of policy, systems and services. A commitment from all Departments to address the data gaps is essential. In Scotland, a dedicated working group has been established to identify and interpret relevant data,³ CiNI would welcome this approach being considered.

¹ [CRC/C/GBR/CO/5](#) (2016) Concluding observations on the fifth periodic report of the United Kingdom of Great Britain and Northern Ireland, at para 77.

² As defined in Section 1(2) of the Children's Services Co-operation Act (Northern Ireland) 2015, 'well-being of children and young people' includes - physical and mental health; enjoyment of play and leisure; learning and achievement; living in safety and with stability; economic and environmental well-being; making a positive contribution to society; living in a society which respects their rights; and living in a society in which equality of opportunity and good relations are promoted.

³ [New Scots Refugee Integration Strategy](#) (p75)

- The vision statement should be strengthened by clearly stating that migrant, asylum seekers and refugees should be welcomed, met with compassion and supported to integrate into communities from day one of arrival. We enclose suggested text for consideration:

“Our vision is for a welcoming, compassionate, cohesive and shared society where refugees and asylum seekers are valued and feel safe, are integrated into communities and are supported to reach their full potential from the day they arrive.”

- The stated ‘beneficiaries’ include: “*asylum seekers and refugees, those who have been reunited here under the family reunification scheme and the communities where our refugees live.*” (p16) We ask that any differentiation between the entitlement and protection of these groups, due to immigration status, be clearly defined. It may be necessary to amend the Strategy title to reflect this.
- The Strategy includes commitments for engagement and inclusion to ensure the lived experience of asylum seekers and refugees is considered. This is positive and should include an action for government departments to create specific mechanisms for gathering and recording evidence of the lived experience of migrant, asylum seeking and refugee children and families.
- Research findings⁴ show significant challenges in terms of quality education for asylum seekers and refugees, who may arrive with poor literacy and numeracy skills due to interrupted or no previous education. The research found that support for children varies considerably, particularly when addressing language barriers; with placements in Special Schools taking longer to secure, especially if a child has complex medical needs. CiNI consider the right to quality education a key part of the integration Strategy and we would welcome more detail on how children’s educational needs will be met.
- Pathways out of destitution, facing destitution and those who have No Recourse to Public Funds (NRPF) is immediate and should commence without delay. The Joseph Rowntree Foundation’s research [Destitution in the UK](#), reported that more than a quarter (28%) of destitute households in 2019 involved a migrant to the UK. In its 2021 report, [A Hostile Environment: children and families affected by No Recourse to Public Funds](#), the Children and Young People’s Commissioner (NICCY) identified that not enough is known about the numbers of children and families affected, their conditions or access to support to ensure that children’s welfare, health and development are safeguarded. CiNI endorse

⁴ For example see [Asylum Seekers and Refugees’ Experience of Life in Northern Ireland](#); and [A New Life For Me](#)

NICCY's enclosed report recommendations for the UK and NI Governments, and we ask that they are actioned without delay and included in the final Strategy.

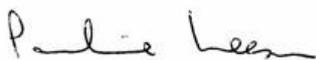
- Undertake work to identify how many children in NI are living in a family with no recourse to public funds and to publish this data. This should include both figures held by the Home Office in regard to immigration control and legal status and by the Department of Health in relation to children who may be eligible for or are receiving support under Article 18 of the Children (Northern Ireland) Order 1995.
 - Develop clear pathways across and between Home Office and health and social care agencies to ensure that children and families who may be subject to no recourse to public funds are referred and that the needs and best interests of children are assessed as a matter of urgency. This pathway information should be published.
 - Address the needs of each child, particularly ensuring that they have access to the highest standard of health care, an effective education, an adequate standard of living and all other protections afforded by the UNCRC.
- CiNI also endorse and call to action the [Anti-Poverty Strategy Expert Advisory Panel report](#) recommendation that, "*The APS must include policies aimed at eradicating destitution, hunger, and 'severe' poverty, including homelessness. No adult or child should be excluded from emergency funds or food provision because of a 'hostile environment' immigration policy.*" We also ask that the Anti-poverty Strategy is included in the list of policies under the destitution paragraph on page 8.
 - We welcome the outcome 2 commitments to review resourcing to ensure appropriate services and expertise is in place to meet the volume and needs of unaccompanied asylum seeking children. According to Barnardo's, in the first three years since the Independent Guardian Service began, over 121 children have been supported – compared to the original yearly estimate of twelve children. It is essential that resourcing is monitored to ensure that funding meets demand and complexity of need.
 - The [Disability Strategy Expert Advisory Panel report](#) identified that d/Deaf and disabled asylum seekers, refugees and migrants face multiple and complex barriers in realising their human rights, reporting a "marked absence" of available data. The [Asylum Seekers and Refugees' Experience of Life in Northern Ireland](#) research commissioned by the Racial Equality Unit in TEO noted that there are substantial research gaps on asylum seekers and refugees who live with a disability. This points to the need for a specific strategic action to assess, identify

and address the needs of d/Deaf and disabled people, to avoid creating any further vulnerability and risk, and to improve pathways to integration.

- TEO have put in place provision of ESOL (English as a second or foreign language) classes for all refugees and asylum seekers and we support the associated actions under outcome 4. Appropriate resourcing for ESOL support in schools, and the development of parent and child programmes to facilitate home learning is key. This was highlighted in Barnardo's [A New Life For Me](#) research on the integration experiences of Syrian refugee children and families which identified language barriers, shyness and not feeling a sense of acceptance in local communities as barriers to cross-cultural friendships and social participation.
- Children, parents and carers with an intellectual disability can face greater difficulties learning English, which perpetuates social isolation and presents further challenges for their integration.⁵ We ask that identification and communication provision targeted at d/Deaf and Disabled people and people with mental or physical health needs is included as an additional action under outcome 4.

We hope these comments are constructive. Please do not hesitate to contact Orla O'Hagan at orla@ci-ni.org.uk if you require any further information.

Yours faithfully,



Pauline Leeson CBE,
Chief Executive

⁵ [A New Life For Me](#) (p79)