

Developing immigrant integration policy in the Irish public sector: An international human rights and public sector duty approach

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Abstract

This paper outlines a new approach to the development of immigrant integration policy in Ireland that is informed by an international human rights and public sector duty perspective. Based on a comprehensive review, the paper outlines the current state of immigrant integration policies in the Irish public sector, highlighting the limited awareness of this issue among public bodies. It also provides practical guidance for public bodies wishing to develop more effective immigrant integration policies, drawing from international human rights treaties and from examples of policy development in Ireland. Given the reality that Ireland is now a well-established immigrant-receiving country, the paper concludes that Ireland urgently needs a coherent and comprehensive approach to the development of immigrant integration policy. A human-rights-based approach offers such a method and would allow

Ireland, through its public sector, to become a leader in immigrant integration policy development. This approach requires the elaboration of specific integration policies in order to ensure that migrant populations can practically access fundamental human rights such as housing, education, healthcare and employment.

Introduction

The Republic of Ireland¹ is now a well-established immigrant-receiving country. This was confirmed by the Central Statistics Office (CSO) when it published the ‘Migration and Diversity’ results from the 2016 census, stating that ‘non-Irish nationals and those with dual nationality are now well established in Irish society and communities throughout the country’ (CSO, 2017). In April 2016 there were 535,475 people with a nationality other than Irish living in Ireland – a figure that had remained relatively stable since the previous census in 2011. An additional 104,784 people held dual Irish nationality in 2016. Of the people who responded to a question about year of last arrival in Ireland, close to 45 per cent of those with a nationality other than Irish had last arrived to live in Ireland at least ten years previously.² The 2016 census shows that Ireland is clearly an immigrant-receiving country, with a substantial proportion of the non-Irish national population resident in Ireland for at least a decade. The picture is even more striking if place of birth, rather than nationality, is considered. A total of 810,406 people living in Ireland at the time of the 2016 census were born outside the country, an increase of 5.7 per cent from the previous census in 2011.³ In 2016, 17.3 per cent of the population of Ireland was born outside Ireland: the fifth-highest proportion of foreign-born residents in the EU (Eurostat, 2018). Given this, it is important to assess how Ireland has responded to the reality of the significant and consistent immigrant presence through the development and implementation of immigrant integration policy.

By 2008 Ireland had started to take the reality of immigration seriously, with several policy and related initiatives. These included the establishment of the Office of the Minister for Integration in 2007

¹ In the rest of this paper, we use the term ‘Ireland’ to refer to the Republic of Ireland.

² This calculation is based on answers to Question 9 in the 2016 census, which asks if the respondent has lived outside the Republic of Ireland for a continuous period of one year or more. If the answer is ‘yes’, a follow-up question asks the year of last taking up residence in the Republic of Ireland.

³ This figure includes 57,389 people born in Northern Ireland.

and the publication of a range of policy-relevant reports. However, the advent of austerity in Ireland, from late 2008 onwards, brought these initiatives to an abrupt end, and led to the dismantling of organisations with a broader equality mandate (Gilmartin, 2015). The Immigration, Residency and Protection Bill, first introduced in 2007 and ‘flagged as a landmark piece of legislation’ (Landy, 2015, p. 928) which would have put long-term residency and family reunification on a statutory footing, was never passed. The failure to comprehensively reform the immigration, residency and protection systems in a coherent framework has resulted in significant temporal gaps in the development of immigrant integration policies in Ireland. The Migrant Integration Policy Index (MIPEX), which assesses immigrant integration policies across thirty-eight countries, pointed this out in their assessment of policies in Ireland in 2014. MIPEX concluded that ‘[I]ittle has changed in the government’s role and policies on integration, other than ad hoc projects, discussions and guidelines. National authorities are not doing much more than they did in 2007’ (MIPEX, 2014).

In the same period, policy efforts to enhance the integration of immigrants continued in other European countries and throughout the EU, emphasising the importance of immigrant integration ‘for promoting social cohesion and economic growth’ (OECD/European Union, 2015, p. 15). The *Common Basic Principles on Integration* were adopted by EU member states in 2004, followed by the *Common Agenda on Integration* in 2005 (Geddes & Scholten, 2015). The *European Agenda for the Integration of Third-Country Nationals* was agreed in 2011 (Garcés-Mascareñas & Penninx, 2016, pp. 2–3), followed by the publication of an *Action Plan on the Integration of Third-Country Nationals* in 2016 (McGinnity et al., 2018, p. 2). In addition to the MIPEX assessment of integration policies, the Zaragoza indicators provide an agreed set of indicators that allow immigrant integration outcomes to be measured across the EU and the OECD (Huddleston et al., 2013). Despite these shared efforts, Scholten & Penninx (2016, pp. 95, 98) comment that immigrant integration in Europe has remained ‘nationally specific’. Given this, it is important that we consider the lost decade of immigrant integration policy development in Ireland, and the possibilities for new approaches to immigrant integration policy over the next decade. The human rights approach conceptualises integration as a long-term process, the normative goal of which is the full realisation of the human rights of migrants on an equal basis with existing members of

society. The approach offers an antidote to both the problem of effectiveness and that of defining appropriate aims for integration policy. A human rights approach requires the elaboration of specific integration policies in order to ensure that migrant populations can practically access fundamental human rights such as housing, education, healthcare and employment.

In this paper we examine immigrant integration policy in Ireland in more detail. In the first section we discuss the current state of integration policy, paying particular attention to the two key framing policy documents: *Migration Nation* (Office of the Minister for Integration, 2008) and *The Migrant Integration Strategy* (Department of Justice and Equality, 2017). In the second section we highlight the gaps and limitations in current immigrant integration policies in Ireland based on our recent review of public sector bodies. In the third section we propose a framework for immigrant integration policy development that is informed by a human rights and public sector duty perspective. We suggest that effective mainstreaming requires the active engagement of public bodies and we draw on examples of positive public sector policy and practice, gathered through our policy review and subsequent interviews, to illustrate how a human rights approach to integration can be implemented in practice. We conclude by offering practical suggestions for how this framework could be implemented.⁴

Immigrant integration policies in Ireland

There are two key documents that frame the approach to immigrant integration in Ireland. The first, *Migration Nation*, was published in 2008, and was described as a statement on integration strategy and diversity management. It was preceded by a range of other documents, including the report of an Interdepartmental Working Group in 2003 and reports by the National Economic and Social Council and the International Organisation for Migration in 2005 (Gray, 2011, pp. 98–101). *Migration Nation* is significant as the first statement produced by the Office of the Minister for Integration, which was set up in 2007.

⁴ This paper is based on a research project funded by the Irish Human Rights and Equality Commission under the Human Rights and Equality Grant Scheme. The project was entitled “‘All the Children of the Nation’: Integration Policy in Ireland through the Lens of Human Rights and Equality”, and it ran from November 2016 to November 2017 (for further details, see Murphy et al., 2017).

The second key document, *The Migrant Integration Strategy*, was published in 2017 by the Department of Justice and Equality. By this stage, the role of Minister for Integration had been incorporated into a broader brief, and encompassed Equality, Immigration and Integration in a junior ministerial role.

Migration Nation was influenced by the EU's Common Basic Principles, though it insisted on the 'unique position' of Ireland as a relatively recent country of immigration (Office of the Minister for Integration, 2008, p. 32). It introduced a range of new institutional structures for dealing with integration, including a renamed Cabinet committee, a Commission on Integration, a Ministerial Council on Integration, and a Task Force on Integration. It also introduced new funding streams to support integration-related activities, directed towards sporting organisations, political parties, faith-based groups and local authorities. The domains that were identified as important for immigrant integration are listed in Table 1, but the document contains no specific targets or measurable outcomes in relation to policy development or assessment. *Migration Nation* also insisted on the importance of an 'overarching mainstreaming approach for integration services' (Office of the Minister for Integration, 2008, p. 16).

As Table 1 demonstrates, there were some clear gaps in the issues highlighted as important for immigrant integration by the 2008 strategy in Ireland. While some potential funding schemes – for example, to support political parties in developing integration policies – addressed other key domains, on balance *Migration Nation* was limited in scope and ambition. It made no obvious reference to issues such as permanent residence and family reunion; its attention to key issues such as education and health was somewhat vague and lacking in specific targets (Office of the Minister for Integration, 2008, p. 58). It barely engaged with the question of employment, other than to highlight public sector employment and, elsewhere, to insist on the need to manage 'economic migration' (Office of the Minister for Integration, 2008, p. 48). Beyond this, as Boucher highlights, the proposals in *Migration Nation* remained 'at the level of discourse' – a statement to form the basis of discussion, from which nothing concrete had emerged – with the advent of the economic crisis in 2008 (Boucher, 2011, p. 135). Following this, the responsibilities of the Minister for Integration were absorbed into other ministerial portfolios until 2011. Between 2011 and 2014, no minister had

responsibility for integration; from 2014 to 2016, there was a ministerial appointment with responsibility for ‘new communities’. Integration as a specific ministerial responsibility was only reintroduced in 2016.

The second key document, *The Migrant Integration Strategy*, was published in February 2017 by the Department of Justice and Equality. This strategy is considerably more detailed than its predecessor in relation to actions and outcomes. It explicitly addresses both EEA and non-EEA immigrants, and specifically mentions, in addition to migrants, those of migrant origin. The strategy also specifies seventy-six actions to be taken across twelve domains, noting both the responsible body and the time frame for implementation. Table 1 also provides an overview of the key actions of the strategy and indicates that the 2017 strategy is better aligned with the domains of integration policy assessed by MIPEX compared to the issues highlighted in the 2008 statement. Just one domain – family reunification – is unaddressed in both documents. Like *Migration Nation*, the 2017 strategy document also insists on the importance of mainstreaming integration issues. This is clear in the category of issues/actions called ‘other’, which does not explicitly map to the MIPEX domains, but covers public services in general. The ‘other’ category also highlights the significance and importance of non-governmental organisations and voluntary bodies in the process of immigrant integration in Ireland, continuing what has been described as a reliance on non-state providers to deliver public services and goods (Scott, 2014).

As noted in *The Migrant Integration Strategy*, ‘the principle of mainstreaming has been established policy since 2008’ (Department of Justice and Equality, 2017, p. 13). In this way, the policy in Ireland mirrors similar trends in other European countries. Scholten et al. suggest that mainstreaming of immigrant integration policies has involved a shift from specific to generic policies that have a “‘whole society” approach rather than addressing only specific groups within society’ (Scholten et al., 2016, p. 286). However, effective mainstreaming also involves intensified action by public bodies with responsibility for key aspects of immigrant integration; for example, in relation to work, education or housing (Huddleston et al., 2013). Given this, we decided to review the policies of public bodies in Ireland to assess the extent to which they had engaged in the development of specific and/or general policies in relation to immigrant integration. We discuss our review of public bodies in the next section.

Table 1: MIPEX domains of integration policy highlighted in *Migration Nation (2008)* and *The Migrant Integration Strategy (2017)*

<i>MIPEX domain</i>	<i>Migration Nation (2008): important issues</i>	<i>Migrant Integration Strategy (2017): key actions</i>
Labour market	Recruitment to the public service	Employment and pathways to work
Family reunion		
Education	Language teaching	Education
Health	Health services	Health
Political participation		Political participation
Permanent residence		Access to citizenship/long-term residency
Access to nationality	Citizenship	Access to citizenship/long-term residency
Anti-discrimination	Measures to protect migrants from exploitation and discrimination Measurement of public opinion	Promoting intercultural awareness and combating racism and xenophobia
Other	Provision of information Provision of services Interpretation and translation services Non-governmental organisations Funding for local authorities	Access to public services and social inclusion Integration in the community Volunteering Sport

Immigrant integration policies in the public sector in Ireland

For the purposes of our review, we began by identifying public bodies in Ireland. We checked the current status of public bodies listed on the Irish State Administration Database in 2017 (Hardiman et al., 2017), and updated the database for our purposes where necessary. Where possible, we noted who had responsibility for integration and/or

diversity policy and their contact details. We chose to include both integration and diversity policy because we realised, following initial investigation, that while integration was not a listed responsibility in many public bodies, diversity was. We hypothesised, then, that a diversity mandate may indeed cover some key areas for integration policy, given that many of the EU's Common Basic Principles specifically highlight the importance of respect for diversity. In total, we identified 432 public bodies. Beginning on 18 April 2017, we wrote to all these public bodies – using standard post – to request a copy of their integration and/or diversity policy or strategy documents by a specific deadline. If we had not received a response by that deadline, we followed up by letter, email and/or phonecall. By 30 September 2017, we had received responses from 52 per cent of public bodies. Almost 50 per cent of these responses indicated that the public body did not have any relevant policy. A total of 34 per cent of responses – just under 18 per cent of the total public bodies contacted – provided one or more relevant documents. In total, we received 115 relevant documents from 76 public bodies. Of these documents, 37 per cent referred to ‘dignity at work’ or other similar employee or employer policies; 32 per cent referred to ‘inclusion and diversity’; and 11 per cent were general strategic plans and reports with some reference to equality and/or diversity. Just 19 per cent of the documents we received made explicit reference to integration, interculturalism or anti-racism.

When public bodies responded that they did not have a relevant policy, they often explained why. Most frequently, they said that the organisation had no role to play in migrant integration, often justified with reference to its legislative remit. This is despite the insistence, in *The Migrant Integration Strategy*, that mainstreaming of integration policy is established policy. Some said they followed general civil service policies or circulars, but did not indicate any specific policies or circulars. Some provided documents that, on investigation, had no relevant provisions. Around 20 per cent provided examples of positive practice, even though they did not have a policy or strategy document. However, a significant minority – around a third – did not give any reason or justification for their lack of policy or strategy.

Of the documents we received, the most relevant were those dealing with integration, interculturalism or anti-racism (19 per cent of the total). These most often came from local authorities, though a small and varied group of other public bodies also had relevant policies or strategies. Often, these documents provided specific

information on how the public body planned to address racism, encourage integration and promote intercultural awareness. In contrast, a considerable number of public bodies forwarded us documents with a focus on dignity at work (37 per cent of the total). These documents were broadly similar in content, and were primarily concerned with recruitment, human resources and the public body as a place of work. They had little or no relevance to immigrant integration. Similarly, documents that mentioned ‘inclusion and diversity’ (around 32 per cent of the total) also focused primarily on recruitment. While some focused on the organisation’s work and its stakeholders, most were vague in nature and did not address the issue of diversity in a meaningful way.

Our desk review of immigrant integration policies in public bodies in Ireland highlighted some important issues. First, the spread of immigrant integration policies across public bodies is patchy. Put bluntly, a considerable number of public bodies do not have integration policies: a surprising finding given the emphasis on mainstreaming in the 2008 and 2017 documents. Second, there is limited awareness of both the process of immigrant integration and the specific ways in which immigrant integration differs from diversity, inclusion or dignity at work. Given the size and stability of the immigrant population in Ireland, these policy gaps raise concerns about the extent to which public bodies are aware of the significance of immigrant integration policy, their role in supporting immigrant integration or the need for intensified action by public bodies in relation to specific domains. The desk review revealed some examples of good policy and practice, and we also carried out interviews with officials in six public bodies where this was the case. In the next section, we offer a new framework for immigrant integration policies, informed by the public sector duty, by international human rights law, and by examples of existing good practice from public bodies in Ireland (including the input from the interviews).

A new framework for immigrant integration policies in Ireland

The results of the desk review suggest that many public bodies have, to date, paid limited attention to immigrant integration. However, *The Migrant Integration Strategy* clearly signals that immigrant integration should receive more attention from public bodies, a development that is based on evidence from a wide range of European countries. Given this, in this section we propose a new framework for the development

of immigrant integration policies in Ireland, based on a human rights approach.

Our starting point is section 42 of the Irish Human Rights and Equality Commission Act, 2014. Section 42 introduced the Public Sector Duty, which is clearly outlined in subsection 1:

A public body shall, in the performance of its functions, have regard to the need to –

- (a) eliminate discrimination,
- (b) promote equality of opportunity and treatment of its staff and the persons to whom it provides services, and
- (c) protect the human rights of its members, staff and the persons to whom it provides services.

Public bodies also have a statutory duty, pursuant to section 42(2), to ‘assess, address and report on equality and human rights in the context of its purpose and functions’ (Irish Human Rights and Equality Commission, 2019, p. 2). Crowley explicitly notes the public sector duty’s intersection with *The Migrant Integration Strategy* (Crowley, 2017, p. 143). We concur, arguing that the public sector duty is a useful starting point for the development of an effective immigrant integration policy precisely because of its focus on the human rights of members, staff and the broader public. ‘Human rights’ for the purposes of the section 42 public sector duty (as defined in section 29) are, broadly speaking, the civil and political rights protected under the Constitution and under international commitments which have been given effect in domestic law. However, a broad understanding of what a human rights approach to integration entails can be found in international human rights law, as explained and interpreted by the UN human rights treaty monitoring bodies. Three UN human rights treaties are particularly important: the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD); the International Covenant on Economic, Social and Cultural Rights (ICESCR); and the International Covenant on Civil and Political Rights (ICCPR). This is because these three treaties are based on the principle of universality (Murphy, 2013a, 2013b), and thus apply to all people living in Ireland regardless of their citizenship, nationality or migrant status. In particular, we argue that the concluding observations on state reports of three UN bodies who monitor these treaties – the Committee on the Elimination of Racial Discrimination (CERD); the Committee on Economic, Social and Cultural Rights

(CESCR); and the Human Rights Committee (CCPR) – offer an important addition to the public sector duty and, consequently, useful guidelines for how public bodies in Ireland could develop immigrant integration policies that prioritise human rights. This clearly aligns with the mainstreaming approach to immigrant integration favoured by *The Migrant Integration Strategy*. Moreover, the concluding observations often address integration and migrants' rights issues, and identify specific actions that states could take to pursue effective human-rights-based integration policies. An analysis of the normative concept of integration contained in the concluding observations assisted us in identifying key issues for policy development and implementation in the context of a best-practice human-rights-based model of integration.

Of these three monitoring bodies, the CERD provides the most explicit account of immigrant integration in its concluding observations. The CERD argues that states must put in place measures that facilitate immigrant integration, where integration is understood as a two-way process.⁵ The CERD has also made specific recommendations in relation to particular domains, such as labour market, political participation, access to nationality, and the protection of social and economic rights. In contrast, CESCR and the CCPR rarely mention integration per se as an explicit focus. However, both make frequent, if indirect, observations on immigration- and integration-related issues. This is particularly the case for the CCPR, which comments on issues such as family reunification and discrimination, both highlighted as important policy domains by MIPEX (see Murphy et al., 2017, pp. 9–12, for a more detailed account).

Taken together, the public sector duty and the observations of the CERD, the CESCR and the CCPR offer a guide to how public bodies in Ireland could develop human rights and equality-based immigrant integration policies. Our review, which also incorporated the guide to measurement and implementation of human rights norms published by the UN High Commissioner for Human Rights (OHCHR, 2012), identified that human rights and equality-based integration policy development processes should pay attention to three key areas: the

⁵ This definition of integration is also central to the EU's Common Basic Principles, the first of which states that 'integration is a dynamic, two-way process of mutual accommodation by all immigrants and residents of Member States' (European Commission, 2004).

development of policy, the process of implementing policy and the assessment of policy effectiveness. We discuss each of these in turn. In doing so, we draw on examples from six public bodies who we identified as having good practice in policy development, and whose representatives we interviewed between August and November 2017.⁶

Integration policy development

If a public body is to develop a human-rights-based immigrant integration strategy, it is important to begin by identifying the specific human rights that are relevant to the organisation's work and stakeholders, taking a broad approach to the concept of 'human rights' and using the Universal Declaration of Human Rights as a reference point.⁷ Following on from this, the next stage is assessing the nature of the organisation's work and the needs of its stakeholders. This will differ, depending on the organisation's centrality to the key integration domains listed in Table 1, and on the organisation's role in direct service provision. Accurately assessing the needs of an organisation's stakeholders may involve the gathering of demographic data related to staff or service users such as information about their countries of origin. However, people may be reluctant to provide such data due to fear that they may be used to discriminate against them. Organisations should therefore clearly explain the reasons for collecting the data and the purposes for which the data will be used; communicate to stakeholders that data will be collected in accordance with data protection legislation; foster an inclusive culture that will build trust and credibility; and offer ways for data to be gathered anonymously, such as the use of anonymised surveys. Data collection at the outset of policy development can help to identify gaps in existing policies, areas or issues that need to be prioritised and can provide a baseline, which can be used as a comparator in assessing policy effectiveness. If the organisation plays a key role in service delivery, it is also important to review available demographic data for the population in the area where services are provided. Identifying the relevant human rights and the nature of work/needs provides the initial framework for the development of a targeted and effective immigrant integration policy. The next stage is to review the

⁶ The six public bodies were Dublin Bus, Trinity College Dublin, the Irish Prison Service, the Chester Beatty Library, the Central Bank of Ireland, and Limerick City and County Council (with Limerick Integration Working Group). For more details, see Murphy et al. (2017, pp. 14–15).

⁷ See <https://www.un.org/en/universal-declaration-human-rights/>.

organisation's existing policies, strategies and procedures to identify the areas where immigrant integration issues should or could be incorporated. This should be carried out in collaboration with stakeholders, including service users where appropriate. The development of new or amended policies, strategies and procedures should also be carried out in consultation with stakeholders, who should have an opportunity to inform and respond at every stage.

A number of examples illustrate these broad principles for developing a human-rights-based integration policy. First, the Irish Prison Service, in policy development, makes direct reference to the organisation's obligations under Irish, European and international human rights law; and this in turn underpins the organisation's approach to service delivery. One concrete example is ensuring that migrants have equality of access to mental health care from the organisation's psychology service. Second, Dublin Bus conducted an equality audit before developing its policy and began collecting relevant data, including information about employees' country of origin. Third, the Central Bank of Ireland undertook a policy-planning stage that involved investigating possible data-collection tools, and examined the possibility of conducting an anonymous survey to gather demographic data on its employees. The Central Bank of Ireland also identified the importance of the development of its culture of inclusivity for building credibility among staff regarding the purpose of any data-collection requests. Fourth, the Chester Beatty Library embedded intercultural engagement and dialogue in its mission statement and as a strategic priority for the organisation. Fifth, Limerick City and County Council developed its two integration strategies in collaboration with the Limerick Integration Working Group. These examples show how human rights can frame policy development; how relevant data can be collected and used to assess the needs of stakeholders and identify issues and gaps in policies; how integration-related issues can be incorporated into the organisation's broader strategies; and how stakeholders can be central to the process of integration policy development.

Implementing integration policy

The second component in the development of a successful human-rights-based integration policy is its implementation. This has four key components. The first is the development of a specific implementation plan in collaboration with stakeholders. This should involve using available data relating to stakeholders to design measures that ensure

that target populations are adequately reached and covered, and using available data to identify any issues that may need to be prioritised. For this to be effective, it should set out the measures that are necessary for each action through the articulation of ‘clear and achievable goals’ (FitzGerald et al., 2019, p. 9). In doing so, it should identify the person(s)/department(s) responsible for implementation, and propose a realistic time frame. The second is the provision of support for staff. This includes raising awareness of the importance of integration objectives, and providing relevant and appropriate training for staff, which includes specific training for those who are in public-facing roles. The third is resources. If an integration policy is to be successfully implemented, it must be adequately supported with staff and financial resources. Ongoing data collection regarding the needs of stakeholders may be important to ensure continued resourcing of policy implementation, as well as helping to maintain a focus on the need for implementation generally. The fourth component, which is longer term, is the mainstreaming of integration policy *within* public bodies. It will be important for each department within the organisation to have a clear sense of its specific role and responsibilities in relation to the implementation of integration policy, and understand exactly how it will meet those responsibilities.

There are some useful examples of awareness and training campaigns. These include short leaflets for staff produced by Dublin Bus, explaining the organisation’s equality and diversity strategy, and the multilingual resources for service users prepared by the Irish Prison Service. However, a broader and more holistic approach to the implementation of integration policy is needed.

Assessing policy effectiveness

The third component in developing a human-rights-based integration policy is assessing the effectiveness of the policy and adapting it in light of the assessment. It is a challenge to measure policy effectiveness or, as FitzGerald et al. (2019) frame it, policy success. Given this, we suggest that programmatic success is the most relevant way of assessing immigrant integration policy effectiveness. Programmatic success is achieved when ‘the policy met objectives, produced desired outcomes and created benefit for the target group’ (FitzGerald et al., 2019, p.10).⁸ This is an appropriate measure, suitably adaptable to

⁸ In their discussion of policy successes and failures, FitzGerald et al. contrast programmatic success with process success (how a decision was made) and political success (improving a government’s electoral prospects) (FitzGerald et al., 2019, p. 10).

take account of the necessary differences in emphasis across public bodies. Given this, there are three important components to assessing policy effectiveness. The first is that it needs to be clear who has responsibility for measuring policy effectiveness, and precisely how this measurement will take place. Examples of measurement include data collection and monitoring, surveys, internal audits and progress reports, steering groups and stakeholder feedback mechanisms. The importance of data collection in the initial stages of policy development for later use in assessing policy effectiveness is highlighted in the Office for the Promotion of Migrant Integration's (OPMI) progress report on *The Migrant Integration Strategy*, as it concludes that the absence of baseline data in many areas means it is not possible to measure progress against indicators accurately (OPMI, 2019, p. 88). The second component in assessing policy effectiveness is to ensure that the policy, and its effectiveness, is addressed in the organisation's annual report. The third is to identify policy successes and, also, policy failures in relation to implementation, and to communicate these with stakeholders and use them to inform further policy refinement. Again, Dublin Bus provides some useful examples of how policy effectiveness may be assessed from the perspective of staff. One example is its use of staff representatives (called 'Depot Champions') to liaise with staff who are providing services and to communicate their concerns to senior managers. Another example is its use of a mobile phone application to gather feedback from staff who are geographically dispersed. However, these particular methods refer specifically to staff involvement in policy assessment. Particularly in relation to immigrant integration, a broader range of stakeholders will need to be consulted.

Conclusion

Ireland is now, and has been for a considerable time, an immigrant-receiving society. Given this, it is imperative that the issue of immigrant integration receives more focused attention, not just in order to promote social cohesion, but also to tackle discrimination, promote equality of opportunity and protect the fundamental rights of migrants. Despite the publication of two significant government documents on immigrant integration that advocate a mainstreaming approach, our review of the policy and strategy documents suggested that there have been very limited efforts to develop appropriate immigrant integration policies in public bodies. A coherent and

comprehensive approach to the development of immigrant integration policy in the public sector is urgently needed.

We argue that a human-rights-based approach to immigrant integration policy development offers such a coherent and comprehensive method. The public sector duty introduced in 2014 provides a basis for policy development, particularly when enhanced by the observations of three UN monitoring bodies: the CERD, the CESCR and the CCPR. Taken together, these provide a human-rights-based paradigm for the development of immigrant integration policy that could allow Ireland to become a model of best practice. For this to happen, though, there are three important components. The first is that a public body should expressly identify the specific human rights that apply to its work, and the integration domains that are of relevance. Policy development should then take place with reference to those human rights and integration domains, and in consultation with stakeholders. The second is that the implementation of the policy should be adequately resourced and supported, and should be related to clear and achievable goals. The third is that the effectiveness of the policy should be monitored, and the policy regularly reviewed. These three stages are necessary for effective integration policy development.

Beyond the individual organisations, a more strategic approach across the public sector as a whole is needed to adequately mainstream immigrant integration policy. The public sector should be a leader in integration policy, and a human-rights-based approach allows for a proactive approach to integration that will assist in better immigrant integration outcomes in the short, medium and longer terms. In order to support this, sector-wide round tables, with organisations providing examples of best practice, could help to generate enthusiasm for integration issues. A comprehensive series of education and training programmes on *The Migrant Integration Strategy* could provide support for policy development, and public bodies should be provided with resources and practical assistance in the policy development process. The establishment of an integration forum could provide a platform for public bodies to share experience and learn from best practice, and to better explore the links between integration policy and integration outcomes (for the most recent report on indicators and outcomes, see McGinnity et al., 2018). This would complement the existing Migrant Integration Strategy Monitoring and Coordination Committee, which is comprised of public sector and civil society representatives and

other stakeholders, and is responsible for, among other things, overseeing implementation of *The Migrant Integration Strategy* and agreeing indicators for monitoring progress (Arnold et al., 2019, p. 16). Effective immigrant integration policy development is a crucial link in ensuring successful immigrant integration in Ireland. This is now an urgent necessity, and public bodies can lead the process by developing and advocating a human-rights-based approach.

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