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Developing Integration Policy in the Public Sector: A Human Rights Approach

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Executive Summary

Background

This research was funded by the Irish Human Rights and Equality Commission through the Human Rights and Equality Grant Scheme 2016-2017, and conducted at Maynooth University by Dr Clíodhna Murphy, Leanne Caulfield, and Professor Mary Gilmartin.

Aims of the research

Irish migrant integration policy has evolved in a largely piecemeal manner to date, but has been given fresh life by the publication of the Migrant Integration Strategy in 2017. In this context, we identified a need for a complete audit and review of the policies and strategies devised by public bodies in this sphere.

This research aims to introduce an explicit human rights and equality dimension to the analysis and development of integration policy in Ireland. It does this, in three stages, by:

1. Outlining a best practice human rights-based model of integration;
2. Auditing the extent to which public bodies in Ireland have developed integration policies or strategies; and
3. Assessing the content of these policies against the human rights-based model.

What is “integration policy”?

Our research shows that many public bodies are active and engaged with the ideas of “equality” and “diversity”. We treat specific “integration policy” as being related to but distinct from these types of general inclusion policies. Integration policy specifically addresses the needs of migrant populations.

It provides a framework to facilitate the inclusion of migrants as equal members of Irish society through access to (for example) employment, education, housing or services. This entails identifying and assessing specific barriers to the full realisation of migrants' human rights and addressing those barriers through specific policy measures.

Research methodology

This project had four key components. First, we developed a model of best practice for integration policy by drawing on International Human Rights Law and the public sector duty set out in section 42 of the Irish Human Rights and Equality Commission Act 2014 ("Public Sector Duty"). Second, we conducted an audit of the integration policies of public bodies in Ireland. This involved writing to 432 public bodies requesting a copy of their integration and/or diversity policy or strategy documents. Third, we reviewed the integration policies provided using a series of "human rights indicators". Fourth, we carried out interviews with a small sample of public bodies whose integration policies provided examples of good practice.

A human rights-based model of integration

We argue that integration must be considered a long-term process, and that the normative goal of this process should be the full realisation of the human rights of migrants and their inclusion as equal members of society. The central elements of a human rights-based approach to integration are:

- A commitment to the positive duty to eliminate discrimination (including the elaboration of integration policy and the allocation of resources).
- The active promotion of tolerance and respect for cultural and linguistic diversity.
- A rejection of the ideas of (i) cultural assimilation; (ii) a one-sided notion of integration which places the onus of 'integration' primarily on the individual; and (iii) integration 'testing' of individuals.
- The implementation and monitoring of practical integration measures to ensure equality of opportunity in respect of civil, political, social and economic rights, for all people resident in the State.

Key findings of the audit and evaluation

Our audit and evaluation of the integration policies of public bodies in Ireland clearly demonstrate that integration policies and measures are not yet being mainstreamed in the work of all public bodies.

There are some positive findings. These include the lack of negative references to integration and human rights, and the existence of examples of good policy and practice in some public bodies.

However, integration policy is generally under-developed in the public sector in Ireland. A striking outcome is that only 5% of the public bodies we contacted provided us with a policy or other document that explicitly mentioned migrant integration. We conclude that public bodies in Ireland need to be more explicit in how they address the broader question of migrant integration.

Similarly, the idea of "human rights" is rarely referred to in the policies examined (less than 10% of these policies). Specific human rights are almost never identified. We suggest that there is a need for greater understanding of the positive duty to promote and protect human rights rather than just to prevent breaches of human rights, particularly with reference to integration.

The research also points to some gaps in terms of practical implementation of existing policies. Less than 50% of the policies studied identify a position or department of responsibility for ensuring the implementation of the policy. It also appears that the formal evaluation of the success of integration policies is rare.

Recommendations

In Ireland, public bodies have the opportunity to take a leading role in the development of human rights-informed integration policies. Such an approach, we argue, will enable the inclusion of migrants as equal members of Irish society and facilitate social cohesion in Ireland, now and in the future. Our key recommendations to achieve this aim include:

- National policy-making bodies (particularly government departments) should take a stronger leadership role in relation to migrant integration. This would build on the existing legislative equality framework and the Public Sector Duty, to include the broader process of integration.
- Integration objectives should be set out in the strategic plans, or other core documents, of public sector bodies.
- Training programmes, as well as resources and guidance, should be provided on how to incorporate human rights in integration policies; the relevance of the Public Sector Duty to integration; and actions required under the Migrant Integration Strategy.
- A public sector integration forum should be established to support public bodies to discuss, review and share knowledge on integration policy development, implementation and review.
- Mechanisms for policy review or evaluation should be a key factor in integration policy development.

Finally, we provide practical guidelines for public bodies on how to integrate a human rights-based approach to integration into their work. These guidelines are contained at page 27.

Introduction

Ireland is now an immigrant-receiving society, with a long-established immigrant population. Census 2016 shows that 17.3% of the resident population of Ireland was born outside the country (CSO 2017a). This is the fourth highest proportion of foreign-born residents in the EU, following Luxembourg (45.2%), Cyprus (20.4%) and Austria (18.2%) (Eurostat 2017).

Table 1 provides information on place by birth by broad geographical category. This highlights the high proportion of foreign-born residents of Ireland who were born in other EU countries, particularly the UK, Poland and Lithuania. Though census data on this issue is incomplete, it appears from both the census and the migration flow estimates that a considerable number of residents who were born in other EU countries have lived in Ireland for 10 years or longer.

Table 1: Place of birth of resident population of Ireland, 2016

Place of birth	Population	Percentage
Ireland (incl. Northern Ireland)	3,879,515	82.7%
UK	277,206	5.9%
Rest of EU-15	63,335	1.4%
EU-13	230,452	4.9%
Rest of World	239,413	5.1%
Total	4,689,921	100%

Source: CSO 2017a

However, Census 2016 and earlier censuses also highlight some of the ways in which Ireland's immigrant population does not have the same opportunities as residents of Ireland without a migrant background. Two areas are worthy of note. The first is employment. Immigrants in Ireland are over-represented in sectors such as wholesale and retail trades, accommodation and food services, and the health sector. In contrast, immigrants are under-represented in the public administration sector, a reality that is of particular relevance to our study. A snapshot of the sectoral concentration of immigrants at work in Ireland is shown in Table 2.

Table 2: Industrial sector employment by nationality, 2016

Sector of Employment	Number Employed	Irish (%)	Non-Irish (%)
All workers	1,970,728	83.6	16.4
Accommodation and food services	115,750	64.2	35.8
Administrative and support services	70,114	72.7	27.3
Manufacturing	198,790	81.4	18.6
Wholesale and retail trades	264,331	82.3	17.7
Human health and social work	220,399	89.8	10.2
Education	174,282	93.0	7.0
Agriculture	88,637	93.7	6.3
Public administration	104,272	96.9	3.1

Source: CSO 2017b

The second is housing tenure, which shows that immigrants in Ireland are disproportionately concentrated in the private rental sector. For example, 72.9% of households headed by Polish nationals and 74.9% of households headed by Indian nationals are in the private rental sector. In comparison, just 12.7% of households headed by Irish nationals are in the private rental sector (CSO 2017c).

It is important that public bodies acknowledge the reality of Ireland as an immigrant-receiving society, and the specific challenges faced by immigrants, as they develop and refine policies and strategies. As we discuss in Chapter 1, the approach of public bodies towards migrant populations is often framed in terms of 'migrant integration', which we understand as the full realisation of the human rights of migrants and their inclusion as equal members of society (Murphy 2013a, 2013b; Xanthaki 2010, 2016). In this research, our first aim was to audit the extent to which public bodies in Ireland have developed integration policies or strategies to address the societal reality of a significant immigrant population. We outline how we carried out this research in Chapter 1 (Section 1.2).

Our next aim was to assess the content of the integration and related policies and strategies of public bodies in Ireland. While a small number of public bodies had specific integration policies or strategies, significantly more had policies or strategies that addressed issues of diversity, inclusion and equality. We provide an overview of these policies and strategies in Chapter 2, together with our evaluation of the policies and strategies with reference to content, process and outcomes.

Our overall approach to assessing the integration policies and strategies of public bodies in Ireland is informed by a human rights and equality perspective. The general Public Sector Duty laid down in Section 42 of the Irish Human Rights and Equality Commission Act 2014 requires public bodies to apply a human rights and equality lens, and we argue that this is particularly relevant for the development of migrant integration policies. We discuss the strengths of a human rights and equality approach to integration in Chapter 1, and we use this as a framework for our assessment of policies and strategies in Chapter 2.

We outline our conclusions and recommendations in Chapter 3. Integration is a policy area where Ireland has an opportunity to embrace best human rights and equality practice. Based on our audit and assessment of the integration policies of public bodies, we conclude that this is an opportunity that has yet to be realised. We provide concrete examples of how this might happen in Chapter 3.

The recent publication of *The Migrant Integration Strategy: A Blueprint for the Future* by the Department of Justice and Equality outlines a "long-term vision of Ireland as a society in which migrants and those of migrant origin play active roles in communities, workplaces and politics" (2017: 2). Public bodies have a crucial role in this process. A human rights and equality framework offers a blueprint for how public bodies might lead by example in the area of migrant integration.

Chapter 1

Developing and Measuring Integration Policy: Theory and Practice

The issue of migrant integration has become a key policy area in Ireland and its European neighbours, as well as at European Union (“EU”) level. Like most European countries, Ireland is an immigrant-receiving society and it is important that public bodies acknowledge this reality as they develop and refine policies and strategies.

The approach of public bodies towards migrant populations is often framed in terms of ‘migrant integration’, however integration policies often come up short in terms of ensuring that migrants have equal opportunities as residents without a migrant background. We argue that integration must be considered a long-term process, and that the normative goal of this process should be the full realisation of the human rights of migrants and their inclusion as equal members of society (Murphy 2013a, 2013b; Xanthaki 2010, 2016).

In Section 1.1 of this chapter, we will briefly survey a variety of existing integration definitions and indicators, before making the case for the need to incorporate a human rights-based approach to policy-making in this sphere. We then set out what constitutes international best practice on human rights-based integration, drawing on International Human Rights Law. Finally, we examine how integration policy has developed to date in Ireland, and consider how the human rights-based approach could add value to existing policy.

Section 1.2 outlines the methodology employed in auditing the integration policies of Irish public bodies, in carrying out an evaluation of the policies received from public bodies and in conducting research interviews with a small number of public bodies.

1.1 Defining and Understanding Integration

1.1.1 Existing definitions, indicators and benchmarks of integration

“Integration” is a notoriously difficult idea to pin down, and the meaning and measurement of integration remain controversial. Some commentators view the idea as inherently negative and as representing a rejection of diversity by migrant receiving societies (Guild 2004). Integration is sometimes associated with assimilation and discrimination, and this frame of analysis has become increasingly relevant in the context of the use of integration “tests” by many European states as a mandatory condition for entry to the state or access to social welfare and residency rights (Jesse 2017a; Wiesbrock 2009). At the same time, however, competing narratives of integration centred on holistic, two-way paradigms of integration continue to emerge from NGOs, international organisations and academics (Ager and Strang 2008, 2010; Da Costa 2006; Jesse 2017b).

Here, we outline some definitions of integration as well as indicators or measurements of integration.

(i) Definitions of integration

The EU Common Basic Principles and Framework on Integration

The approach taken in the EU Framework for the Integration of Third Country Nationals (EU “Framework on Integration”) has been to identify “**Common Basic Principles** for Immigrant Integration Policy in the EU” (“CBPs”). These CBPs are primarily intended to assist Member States in formulating integration policies by offering a non-binding guide to basic principles against which they can judge and assess their own efforts. Irish integration policy uses the CBPs as a benchmark (Department of Justice and Equality 2017) The CBPs define integration as “a dynamic, two-way process of mutual accommodation by all immigrants and residents of Member States” (European Commission 2004). The principles are wide-ranging and emphasise the importance of employment; education; access to institutions of the host society on an equal basis to EU citizens; participation in the democratic process; and free practice of religion and culture.

Common Basic Principles

1. Integration is a dynamic, two-way process of mutual accommodation by all immigrants and residents of Member States
2. Integration implies respect for the basic values of the European Union
3. Employment is a key part of the integration process and is central to the participation of immigrants, to the contributions immigrants make to the host society, and to making such contributions visible
4. Basic knowledge of the host society’s language, history, and institutions is indispensable to integration; enabling immigrants to acquire this basic knowledge is essential to successful integration
5. Efforts in education are critical to preparing immigrants, and particularly their descendants, to be more successful and more active participants in society
6. Access for immigrants to institutions, as well as to public and private goods and services, on a basis equal to national citizens and in a non-discriminatory way is a critical foundation for better integration
7. Frequent interaction between immigrants and Member State citizens is a fundamental mechanism for integration. Shared forums, intercultural dialogue, education about immigrants and immigrant cultures, and stimulating living conditions in urban environments enhance the interactions between immigrants and Member State citizens
8. The practice of diverse cultures and religions is guaranteed under the Charter of Fundamental Rights and must be safeguarded, unless practices conflict with other inviolable European rights or with national law
9. The participation of immigrants in the democratic process and in the formulation of integration policies and measures, especially at the local level, supports their integration
10. Mainstreaming integration policies and measures in all relevant policy portfolios and levels of government and public services is an important consideration in public policy formation and implementation.
11. Developing clear goals, indicators and evaluation mechanisms are necessary to adjust policy, evaluate progress on integration and to make the exchange of information more effective.

The CBPs have been further developed in subsequent policy documents, including most recently the *Action Plan on the Integration of Third Country Nationals* (European Commission 2016). Studies of this policy framework have criticised an increasing tendency to focus on migrants’ obligations to display respect for diversity and the EU’s basic values, rather than on Member State obligations to take proactive steps to ensure equality of opportunity (Carrera 2012; Murphy 2013b).

UNHCR's definition of refugee integration

The Office of the United Nations High Commissioner for Refugees ("UNHCR") uses a similar formulation to the CBPs in the context of refugee integration, which is defined as a "dynamic and multifaceted two-way process which requires efforts by all parties concerned, including a preparedness on the part of refugees to adapt to the host society without having to forego their own cultural identity, and a corresponding readiness on the part of host communities and public institutions to welcome refugees and meet the needs of a diverse population" (Da Costa 2006).

UNHCR emphasises the complex and multi-dimensional nature of the integration process, noting that "the process of integration is complex and gradual" (Da Costa 2006). Integration is divided into a three-pronged process of legal, economic, and social and cultural integration. UNHCR has also emphasised the practical importance of the means chosen to promote integration: these can be, on the one hand, targeted support for those who are expected to integrate along with clearly identified obligations or expectations and, on the other hand, ensuring integration through mainstream services from the beginning with little or no initial direct support to integrate.

Most recently, together with the Migration Policy Group, UNHCR has developed an **Integration Evaluation Tool** (IET) specifically designed for refugees. The mix of qualitative and quantitative indicators adopted cover the three prongs identified in the integration definition: legal integration; socio-economic indicators; and socio-cultural indicators (Migration Policy Group 2016).

Academic definitions of integration

In the academic context, **Ager and Strang** have identified elements which are central to perceptions of what constitutes 'successful' integration, based on their review of definitions of the term, related literature and primary fieldwork in settings of refugee resettlement in the UK. Key domains of refugee integration are proposed related to four overall themes: achievement and access across the sectors of employment, housing, education and health; assumptions and practice regarding citizenship and rights; processes of social connection within and between groups within the community; and structural barriers to such connection related to language, culture and the local environment (Ager and Strang 2008, 2010). Ager and Strang conclude that "rights and citizenship" are foundational to the challenges facing policymakers in the field of integration (Ager and Strang 2008).

(ii) Integration indicators and measurements

There have been attempts to provide a common measure of migrant integration across EU and OECD member states. These include measures of migrant integration outcomes and assessments of integration policy.

The Zaragoza indicators measure migrant integration outcomes in terms of employment, education, social inclusion and active citizenship. Table 1.1 shows the original Zaragoza indicators, which were selected because of the availability of high quality data that could be reliably compared internationally.

Table 1.1: Zaragoza Indicators of Integration

Employment	Education	Social Inclusion	Active Citizenship	Welcoming Society
Employment rate	Highest educational attainment	At-risk-of-poverty (and social exclusion)	Naturalisation rate	Perceived experience of discrimination
Unemployment rate	Tertiary attainment	Income	Share of long-term residence	Trust in public institutions
Activity rate	Early school leaving	Self-reported health status (controlling for age)	Share of elected representatives	Sense of belonging
Self-employment	Low achievers	Property ownership	Voter turnout	
Over-qualification	Language skills of non-native speakers			

Source: Huddleston et al 2013: 9

The Zaragoza indicators have been augmented or further developed by the DG Migration and Home Affairs (Huddleston et al 2013). Table 1.2 provides details of their proposed new indicators of integration.

Table 1.2: Proposed New Indicators of Integration

Employment	Education	Social Inclusion	Active Citizenship	Welcoming Society
Public sector employment	Participation in early childhood education	Child poverty	Participation in voluntary organisations	Public perception of racial/ethnic discrimination
Temporary employment	Participation in life-long learning	Self-reported unmet need for medical care	Membership in trade unions	Public attitudes to political leader with ethnic minority background
Part-time employment	Not in education, employment or training	Life expectancy	Membership in political parties	
Long-term unemployment	Resilient students	Healthy life years	Political activity	
Share of foreign diplomas recognised	Concentration in low-performing schools	Housing cost over-burden		
Retention of international students		Overcrowding		
		In-work poverty risk		

Source: Huddleston et al 2013: 9

The **OECD** has also engaged in measuring integration across its member countries. Initially, it focussed on labour market integration but then widened the scope of analysis to consider aspects of integration that go beyond the labour market (OECD 2012; OECD/EU 2015). Integration indicators are grouped under the following integration ‘areas’ in the most recent exercise, undertaken jointly with the European Union:

- Participation in the labour market,
- Job quality
- Education and training
- Household income
- Housing
- Health status and healthcare
- Civic engagement; and social cohesion.

The **Migrant Integration Policy Index** (“MIPEX”) comprises an assessment of the integration policies of 38 countries, using policy indicators which are categorised under 8 policy areas. For each of the 8 policy areas, MIPEX identifies “standards aimed at achieving equal rights, responsibilities and opportunities for all residents”, drawn from the Council of Europe Conventions, European Union Directives and International Conventions, and European-wide policy recommendations (Migrant Integration Policy Index 2015). The policy areas are:

- Labour market mobility;
- Family reunion;
- Education;
- Political participation;
- Long-term residence;
- Access to nationality;
- Anti-discrimination; and
- Health.

1.1.2 The case for a human rights-based approach

A new approach to integration is needed. Current integration policy and practice, both in Ireland and elsewhere, has proved ineffective in ensuring equal access to rights such as employment and housing for migrant populations. The UN Human Rights Committee (UNHRC); the UN Committee on the Elimination of Racial Discrimination (CERD Committee); and the UN Committee on Economic, Social and Cultural Rights (CESCR) have all recently identified serious gaps in human rights protections for migrants living in Ireland (UNHRC 2014; CERD Committee 2011; CESCR 2015). In its concluding observations on Ireland in 2015, the Committee on Economic, Social and Cultural Rights commented:

The Committee is concerned at the increase in the number of people living in consistent poverty or at risk of poverty, particularly among children, single-parent families, older persons, persons with disabilities, migrants, Travellers and Roma. It is also concerned at the lack of integration of economic, social and cultural rights into poverty reduction policies as well as at the absence of concrete policies addressing the specific needs of the groups affected. (CESCR 2015: 7)

In addition to the problem of ineffectiveness of policy and practice, some approaches to integration employ negative practices which centre on migrants’ obligations in the integration process, including the duty to adopt undefined European or national “values”. The EU Framework on Integration, for example, has been criticised for its growing focus in this regard (Carrera 2012). This mirrors an increasing trend across EU Member States to use integration tests as a tool of immigration control and as a condition of naturalisation. For example, applicants are required to pass a “Life in the UK” test in order to obtain indefinite leave to remain and citizenship in the UK (Ryan 2008).

In France, the Netherlands and Denmark (among other countries), pre-departure integration examinations are imposed on those seeking access to family reunification (Bonjour 2010; Jesse 2017a). This type of integration testing has not been a feature of Irish immigration or integration policy to date.

It is clear that, in practice, integration measures can result in the primary responsibility for integration being shifted away from the state and on to migrant individuals and communities. The UN Committee on the Elimination of Racial Discrimination has noted that this “puts migrants in particularly vulnerable situations at risk of receiving insufficient attention and support, leaves them vulnerable to social exclusion, and hampers their integration and the full enjoyment of rights” (CERD 2015). Given this, we argue that current measurements of integration, which focus primarily on outcomes, are insufficient for the purposes of understanding how to develop effective and participatory integration policies. They do not track progress towards these outcomes, and they do not adequately identify the objectives which should inform state policy on integration. As a consequence, they miss opportunities for intervention directed at “full participation and integration of migrants” (CERD 2015: 6).

In our view, integration is a long-term process which aims to ensure the full protection of the human rights of migrants and their inclusion as equal members of society. Employing this approach in Ireland would help to ensure that the state is in full compliance with its legal obligations in International Human Rights Law. Moreover, in Ireland, public bodies are now required to apply a human rights and equality lens to their policies and practices under the general Public Sector Duty laid down in section 42 of the Irish Human Rights and Equality Commission Act 2014.¹ 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.

Accordingly, public sector bodies should be supported in developing integration and intercultural policies which are fully consistent with the highest international human rights standards. In the next section, we discuss best practice on integration as articulated by International Human Rights Law.

1.1.3 Best practice on integration: International Human Rights Law

We have used the concept of integration articulated by the United Nations human rights treaty monitoring bodies as a model of best practice against which to assess integration policies devised by Irish public bodies. This model is based on individual equality, interculturalism, and state responsibility for social inclusion.

Our analysis of the concept of integration by the UN treaty bodies suggests that the essence of integration lies in immigrants, and their descendants, progressively achieving equal treatment and outcomes as existing members of society. The treaty bodies consistently emphasise the legal responsibility of states to facilitate and encourage this process by putting in place effective public policy measures. This evolving integration paradigm could provide the foundation of the Irish approach to integration.

Summary of human rights model:

Drawing on the approach of international human rights treaty monitoring bodies, as well as the Public Sector Duty set out in section 42 of the Irish Human Rights and Equality Commission Act 2014, the central elements of a human rights based approach to integration are:

1. A commitment to the positive duty to eliminate discrimination (including the elaboration of integration policy and the allocation of resources).
2. The active promotion of tolerance and respect for cultural and linguistic diversity.
3. A rejection of the ideas of (i) cultural assimilation; (ii) a one-sided notion of integration which places the onus of ‘integration’ primarily on the individual; and (iii) integration ‘testing’ of individuals.
4. The implementation and monitoring of practical integration measures to ensure equality of opportunity in respect of civil, political, social and economic rights, for all people resident in the State.

This section outlines how we arrived at this human rights model, and gives further details of what it entails.

(i) Drawing on International Human Rights Law: The ICCPR, ICESCR and ICERD

The international human rights treaties are the cornerstones of a rights-based conception of integration and the starting point for the development of inclusive integration strategies.

Our model builds on the previous work of the authors on the development of the concept of integration by the treaty bodies established under the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR) and the International Convention on the Elimination of all forms of Racial Discrimination (ICERD) (Murphy 2013a, 2013b). The principal rationale for the selection of these particular instruments for guidance on best practice on integration is one of universality—the ICCPR and the ICESCR apply to all persons in state parties and thus apply to all migrants in those states. In addition, ICERD applies to all victims of racial discrimination, as very widely defined in Article 5 as “any distinction, exclusion, restriction or preference based on race, colour, descent, or national or ethnic origin”, and so applies to all non-citizen migrants.

¹ Section 42(1) of the IHREC Act 2014 provides: “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.”

The ICCPR, the ICESCR and the ICERD provide the basis for an equality-based paradigm of integration, by generally requiring states to provide the rights enshrined therein to all persons on their territory without discrimination on the basis of nationality, race, religion or immigration status. The principles of non-discrimination and equality, which form the dominant philosophical thread running through the treaties, constitute the foundation of a human rights-based integration paradigm. As will be shown below, this is reflected in the development of a budding integration paradigm in the work of the Human Rights Committee (UNHRC), the Committee on Economic, Social and Cultural Rights (CESCR) and the Committee on the Elimination of Racial Discrimination (CERD Committee). This paradigm is based on non-discrimination and the progressive realisation of equality for migrants.

The examination of the development of the concept of integration in the work of these UN treaty monitoring bodies was conducted primarily through an analysis of their concluding observations on state reports up to December 2017, which often expressly mention integration-related issues and the concept of integration. While concluding observations are generally not understood as having legally binding effect, nevertheless, as outputs of a treaty body, they have a “notable authority, albeit unspecified”, in particular where they purport to interpret treaty provisions (O’Flaherty 2006).

(ii) Specific elements of a human rights approach

UNHRC and CESCR

While the UNHRC and the CESCR refer to integration-related matters they rarely do so under the banner of “integration” and integration in itself is evidently not among the primary concerns of these Committees. Despite this, the UNHRC and the CESCR make many observations which are related (even if for the most part indirectly) to integration. The UNHRC in particular frequently comments on integration-related issues, even if it does not always expressly refer to integration. These issues include family reunification; freedom of religion; and discrimination, xenophobia and racism.²

Similarly, the CESCR consistently refers to discrimination suffered by immigrants and members of ethnic minorities in the fields of housing, employment, health care and education.³ This constructs integration as a long-term and multi-faceted process, involving legal, social and cultural dimensions, rather than a process of cultural assimilation to be undergone by newly arrived migrants.

The framing of integration by the UNHRC mainly in terms of equality under Article 26 rather than in terms of the minority protection provided in Article 27 signals a broad-based conception of integration as the progressive realisation of equality between existing and immigrant populations (rather than centring on a narrow culture-based core).

Key points:

Structural issues

- Equality-based
- Legal, social and cultural dimensions involving a wide range of human rights, including the right to family life; freedom of religion; housing; health care; and education.

Process and Outcomes

- Long-term and multi-faceted process
- Integration policy forms part of more general obligation to eliminate discrimination

CERD Committee

The CERD Committee conceives of integration in terms of an objective in itself and a relatively nuanced conception of integration is under construction in its concluding observations. The basic approach of the CERD Committee is that states are required to ensure that effective measures to facilitate the integration of minority groups (including immigrants) are put into place. These measures may not constitute forced assimilation or segregation, and must respect the cultural identity of migrants. A two-way conception of integration is favoured whereby a balance is maintained, between the responsibilities of the receiving state and its existing communities on the one hand, and those of the migrant in the integration process on the other. The CERD Committee has also made more specific recommendations in relation to the role of political participation; access to nationality; the importance of labour market integration; and the protection of social and economic rights in the integration process.⁴ Finally, the Committee has emphasised the need to allocate resources to the development of integration policy.⁵

Key points:

Structural issues

- Integration an objective in itself, which constitutes a positive obligation on states
- Measures must respect the cultural identity of migrants and avoid assimilation and segregation
- Political participation; access to nationality; equal access and participation in the labour market; and protection of social and economic rights are some examples of important aspects of the integration process

Process and Outcomes

- States required to put in place effective integration policies
- Meeting human rights obligations requires the allocation of resources

² See, for example, Belgium, UN Doc CCPR/CO/81/BEL (12 August 2004); Switzerland, UN Doc CCPR/CO/3 (3 November 2009); Sweden, UN Doc CCPR/CO/6 (7 May 2009).

³ See, for example, Cyprus, UN Doc E/C.12/CYP/CO/5 (12 June 2009); Republic of Korea, UN Doc E/C.12/KOR/CO/3 (17 December 2009); The United Kingdom UN Doc E/C.12/GBR/CO/5 (12 June 2009); Lichtenstein, UN Doc E/C.12/LIE/CO/1 (9 June 2006).

⁴ See, for example, Estonia, UN Doc CERD/C/EST/10-11 (23 May 2014); Belgium, UN Doc CERD/C/BEL/CO/16-19 (14 March 2014); Italy, UN Doc CERD/C/ITA/CO/19-20 (9 December 2016); Poland, UN Doc CERD/C/POL/CO/19 (14 September 2009).

⁵ Portugal, UN Doc CERD/C/PRT/CO/15-17 (31 January 2017); Netherlands, UN Doc CERD/C/NLD/CO/19-21 (28 August 2015).

(iii) Measuring and implementing human rights-based integration policy

Although the core UN treaty monitoring bodies require the effective implementation of integration policy, they provide little or no specific guidance on how this can be achieved. Following several years of research and consultation, the **Office of the UN High Commissioner for Human Rights** has provided a guide to measurement and implementation of human rights norms generally (OHCHR 2012).

In particular, the OHCHR has designed “process indicators”, which help in assessing a State’s efforts to transform its human rights commitments into the desired results. Important process indicators include “indicators based on budget allocations”; and “coverage of targeted population groups under public programmes”. We have drawn on the OHCHR guide to assist in the development of process and outcomes human rights indicators for integration policy in Ireland.

(iv) Summary

The common thread in the work of the three bodies discussed in this section is the emphasis on the protection of the human rights of migrants and the creation of equal opportunities through rights protection. There is also a strong emphasis on putting in place policies which are actually effective in their aim to include migrants as equal members of society.

1.1.4 Integration policy in Ireland

To date, official discourse on integration in Ireland has embraced the type of two-way approach taken in most mainstream integration definitions. One of the first policy documents in the area of integration (dating from 2000) adopted a wide-ranging and inclusive working definition of the concept of (refugee) integration, stating that:

Integration means the ability to participate in Irish society to the extent that a person needs and wishes in all of the major components of society, without having to relinquish his or her own cultural identity. (Department of Justice, Equality and Law Reform 2000)

Integration policy, insofar as it existed at all, was based on this report for eight years.

Since then, integration policy has evolved in Ireland in a largely piecemeal fashion, with various government departments and public bodies producing diversity and intercultural strategies (see, for example, An Garda Síochána 2009; Department of Education and Skills 2010; HSE 2015). The first formal strategy for integration was produced in 2008 by the newly-established Office of the Minister for Integration. This document, called *Migration Nation*, outlines the principles intended to underpin Irish integration policy.

The central features of the policy statement are its mainstreaming approach to the provision of services for new communities; its situation of integration policy in the context of the general social inclusion and equality framework; and its insistence on a two-way model of integration (Murphy 2013b). Other notable features include the emphasis placed on respect for cultural differences and the lack of emphasis on identity or “values” issues. Broadly speaking, a mainstreaming, intercultural approach drawing on EU integration policy is endorsed in the policy documentation. This is welcome, especially when seen in the broader European context of a retreat from multiculturalism and an exclusionary focus in integration policy on “shared values” (Mullally 2013).

The then Office of the Minister for Integration was established in 2007 under the auspices of the newly-created position of Minister of State for Integration. Since its foundation, the Office’s role has been centred on facilitating integration at grassroots level through the funding of sporting groups, NGOs and faith-based community groups rather than developing an overarching integration framework which could be used to inform the action of other state bodies. From 2011 to 2016, although the Office for the Promotion of Migrant Integration remained in place, the development of centralised integration policy was effectively on pause due to the financial crisis and a return to net emigration during that period. There was no specific integration minister between 2011 and 2016. In 2016, the position of Minister of State at the Department of Justice and Equality with special responsibility for Equality, Immigration, and Integration was established, and a new national *Migrant Integration Strategy* was published on 7 February 2017 (Department of Justice and Equality 2017).

Similar to the 2008 Migration Nation strategy, the central features underpinning the new Migrant Integration Strategy are its definition of integration as a broad-based, two-way conception; its focus on a mainstreaming, intercultural approach to policy enforcement; and its foundation on the EU Common Basic Principles for Integration. It also acknowledges that it is addressing a new phase in Ireland’s integration policy; moving beyond the initial phase of focussing on the needs of those newly arrived in Ireland, to that where many migrants have lived in Ireland for some time but may continue to have needs particular to their migrant status. Unlike *Migration Nation*, the new strategy is much more focused on identifying actions rather than setting out guiding principles. The strategy is analysed in more detail in Chapter 2.

1.1.5 The potential for the development of human rights-based integration policy in Ireland

Ireland is a distinctive case study, due in part to the relatively recent nature of the emergence of immigration and integration issues and the resulting absence of a preconceived frame of analysis for integration issues. Integration is a policy area in which Ireland has an opportunity to move beyond minimum standards set in the EU and international law arenas and embrace best human rights practice.

Given the strong case for adopting a human rights approach to integration and the model of good practice contained in the work of the UN treaty monitoring bodies, Irish policy-makers should engage with the human rights and equality-based integration paradigm evolving in the work of these bodies. We have set out the key features of this best practice model in this chapter.

1.2 Research methodology

This project had four key components. First, we developed a model of best practice for integration policy, based on human rights and equality principles. Second, we conducted an audit of the integration policies of public bodies in Ireland. Third, we reviewed the integration policies of public bodies in Ireland from a human rights and equality perspective. Fourth, we carried out interviews with a small sample of public bodies whose integration policies provided examples of good practice. We discuss each of these stages in turn.

1.2.1 Devising a model of best practice

From our review of literature, we concluded that a human rights and equality perspective in integration policies could be assessed with reference to structural issues, process and outcomes. Based on our literature review, we identified the following key features of good practice.

Table 1.3: Human rights and equality indicators of good practice in integration policies

Structural
The policy expressly identifies measures aimed at eliminating discrimination
The policy expressly addresses human rights
The policy identifies practical measures that promote equal access to these human rights
The policy expressly refers to respect for cultural, linguistic or other forms of diversity
Process
The policy is being implemented, with specific budget/staff allocations
The policy provides for sufficient coverage of target populations
The policy is being mainstreamed
Outcomes
It is clear how, and by whom, the effectiveness of the policy is being measured
The success of the policy is addressed in the annual report
The annual report provides for follow-up

1.2.2 Audit of integration policies of public bodies

Our first task was to define and identify 'public bodies' including those classified as public bodies for the purposes of the Regulation of Lobbying Act 2015. Our starting point was the Irish State Administration database, which provides a comprehensive overview of a wide range of public bodies. We checked the current status of public bodies listed on the database, and updated the database where necessary. We also sought, where possible, to identify the person/s within each public body with responsibility for integration and/or diversity policy, and we compiled a revised list of public bodies and relevant contact details.

When we had identified public bodies, we then wrote to all 432 public bodies requesting a copy of their integration and/or diversity policy or strategy documents. We provided a deadline and, if this was not met, followed up with further letters, emails and phonecalls. In total, we contacted 432 public bodies, and we received responses from 52% by 30th September 2017. Of these responses, 34% provided us with a relevant document. The original request letter is provided in Appendix 1. A full list of the public bodies who responded by 30th September 2017 is provided in Appendix 2.

1.2.3 Review of integration policies of public bodies

We developed a template for the review of integration policies based on the indicators shown in Table 1.1. We used this template to review each of the policy documents that we received following our written request(s). In a small number of cases, there were discrepancies between the documents we received and the documents that were publicly available on the public body's website. In some instances, the website had a more comprehensive set of documents than had been provided to us. Where this occurred, we reviewed the document(s) that had been sent to us rather than the document(s) available on the public body's website. In total, we reviewed the policies of 104 public bodies. When the individual reviews were completed, we then analysed the reviews as a whole in order to identify broad trends and patterns in the integration policies of public bodies in Ireland, which included identifying the extent to which integration policies are, or are not, informed by human rights and equality perspectives.

1.2.4 Interviews

In the process of reviewing integration policies, we identified a small number of public bodies that, based on the criteria shown in Table 1.1, had policies that we considered to be good practice and that we wished to interview. In advance of making further contact with these public bodies, we received ethical approval from Maynooth University Social Research Committee to conduct interviews. We then contacted 9 organisations to request their participation in an interview, 6 of which agreed to meet with us. The public bodies whose representative(s) we interviewed are listed in Table 1.4. In total, we conducted 6 interviews with 11 representatives.

Table 1.4: Interviews

Date	Organisation
18 August 2017	Dublin Bus
31 August 2017	Trinity College Dublin
7 September 2017	Irish Prison Service
4 October 2017	Chester Beatty Library
12 October 2017	Central Bank of Ireland
6 November 2017	Limerick City and County Council (& Limerick Integration Working Group)

The interview was semi-structured, and the interview guide is shown in Table 1.5. The interviews were conducted at times and places of the interviewees' choosing. All interviewees were provided with an information sheet giving details of the project, and informed consent was obtained prior to the commencement of the interview (see Appendix 3 for the information sheet and consent form). With permission, interviews were audio recorded and later transcribed. We drew on the interviews to develop our guide to developing an integration policy informed by human rights and equality perspectives.

Table 1.5: Interview guide

Broad area	Suggested questions
Structural: development of policy	What was the impetus for the development of the policy within your organisation?
	What resources or tools did the organisation use to develop the policy?
	Did 'human rights' motivate the development of the policy in any way?
	Is there a particular government or public body you see as offering support for the development of integration policy?
	What could central government do to assist public bodies in developing integration policies?
	Do public bodies see the Public Sector Duty as requiring the elaboration of integration policies?
	What advice would you give an organisation that does not have a policy and wishes to develop one?
Process: implementation of policy	What benefits, if any, do you see from the implementation of the organisation's policy?
	Has the development and implementation of the policy required significant financial resources?
Outcomes: measuring success	How does the organisation measure the success of its policy?
	What are the challenges in understanding if the policy is working?
	What financial resources are needed to measure the effectiveness of the policy?

Our audit and review of relevant policies and our interviews with representatives of selected public bodies are discussed in more detail in Chapter 2.

Chapter 2

Overview of Findings

This chapter first provides a general overview of the responses received from public bodies to our request for policies related to migrant integration, diversity or interculturalism. It then outlines the key findings of our detailed policy audit according to the indicators of good practice adopted (see Table 1.3 in Chapter 1 for further details).

Core findings related to the development, implementation and evaluation of the policies are discussed with reference to practical examples from the experiences of the public bodies interviewed, and lessons drawn from the research interview case studies.

2.1 Overview of Responses

2.1.1 Public bodies with relevant policies

An evaluation of the documents provided to us from public bodies found that 115 relevant documents were received from 76 public bodies; this represents 18% of the total bodies surveyed.

These policies broadly fall into the following four categories, as detailed in Table 2.1 below.

Table 2.1: Breakdown of document categories

Category of relevant document	% of relevant documents
“Dignity at Work” and other similar employee or employer policies	37%
“Inclusion and Diversity” policies/strategies/statements	32%
Specific integration/intercultural/anti-racism policies, guidelines and research reports	19%
General strategic plans and reports which include reference to diversity, equality issues in different ways	11%

2.1.2 Public bodies with no relevant policies

Almost 50% of the bodies which responded stated that they had no relevant policies. The reason most often provided by public bodies for not having policies in place was that it was not within the function of the organisation to play any role in migrant integration. The legislative remit of the organisation was often referred to in this regard. A number of the bodies perceived themselves as being too small in size to have relevant policies in place.

Of the bodies which responded as having no relevant policies, just less than 20% nevertheless demonstrated evidence of positive practice in the areas of equality, diversity or migrant integration.

Examples of positive practice included:

- Organisation or facilitation of inclusion initiatives;
- Provision of relevant training;
- Collaborations with NGOs on joint awareness campaigns; and
- Responses to the specific needs of migrants, including translation, in service provision.

A number of the bodies stated that they follow general civil service policies or circulars in these areas; only two of those bodies cited the relevant policies or circulars. A handful of bodies stated that while they currently have no relevant policies, they are in the process of developing relevant policies, or intend to commence such a process in the near future. A small number of bodies provided documents which were subsequently found to have no relevant provisions. Almost a third of the bodies which stated they had no relevant policies in place provided no reason for the lack of such policies.

2.1.3 General overview of responses

(i) “Inclusion and Diversity” policies/strategies/statements

Many of the “Inclusion and Diversity” policies received were quite vague in nature and referred to diversity in a general manner. Some policies, however, engaged with equality and diversity by specific reference to the nature of the organisation’s work and the needs of its stakeholders. These policies appeared more focused, with a greater potential for practical impact. The central focus of many of policies was on recruitment measures, with little reference to the incorporation of an equality, diversity and inclusion approach in the organisation’s operations generally.

(ii) “Dignity at Work” and other similar employee or employer policies

It was clear from the policy evaluation exercise that many of the “Dignity at Work” policies are almost identical in wording and content, and contain limited specific engagement with the organisation’s overall purpose, functions or stakeholders. They often concentrate on recruitment and other human resourcing functions, with a focus on the organisation as a ‘workplace’ even where such bodies also have an external function.

There is a significant lack of provisions which refer to equality, diversity or integration in the operations of the organisation more generally, including in the area of inter-staff relations or service provision for example. The vague nature of many of the provisions in these policies and the widespread lack of a specified mechanism for policy review are particularly striking.

(iii) Specific integration, intercultural or anti-racism policies

Specific anti-racism, integration or intercultural policies are those which relate most closely to the subject of the research. A high proportion of these were policies or strategies of local authorities although a small diverse pool of other public bodies also had relevant policies. These policies specifically detail measures to address racism, promote intercultural awareness in service provision, and to tackle integration.

(iv) General strategic plans and reports which include reference to diversity, equality issues in different ways

General strategic plans and reports were included in the policy evaluation where they contained substantial reference to, or engagement with, equality, diversity or inclusion. Such general documents contained, for example, reference to intercultural initiatives being implemented by the organisation; well developed commitments to equality, diversity or inclusion; or reference to specific services or measures being put in place to cater for the needs of migrants. It is positive that issues of diversity and equality are being acknowledged by public bodies and often embedded in their strategy statements and broad policy documents. However, it is possible that the lack of specificity involved could lead to a less proactive and targeted approach than if the relevant bodies had also developed specific policies.

2.2 The Migrant Integration Strategy: A national policy framework for migrant integration

Our starting point for the policy evaluation stage of the research was *The Migrant Integration Strategy: A Blueprint for the Future* due to its position as the national policy framework for migrant integration. As outlined in Chapter 1, the strategy was published by the Government in February 2017 as part of a renewed focus on integration.

2.2.1 A human rights and equality focus?

“Human rights” are not expressly mentioned in the Migrant Integration Strategy, apart from a handful of references made in the context of describing the role of the Irish Human Rights and Equality Commission and the Public Sector Duty. There are no references to upholding human rights standards or ensuring that human rights are enjoyed by all, and human rights principles are not expressly given as a rationale for any of the measures outlined in the strategy. However, there are a small number of express references to “equality” and equality principles.

It is stated that the vision of the strategy is to enable migrants or persons of migrant origin to participate “on an equal basis” with those of Irish heritage. The strategy also expresses a commitment to ensuring “equality of opportunity” for second generation migrants although it does not explain how this will be achieved.

The strategy does contain some implicit references to human rights and equality principles and human rights issues. Commitments are made which relate to the right of participation, as the strategy outlines its vision of enabling migrants or persons of migrant origin to participate on an equal basis with those of Irish heritage. The principle of non-discrimination is also referred to implicitly in the outline of measures aimed at combating racism and xenophobia including intercultural training, ensuring representation of migrants on joint-policing committees, and other measures. However, the strategy also states that provision of generic training across the public service via the shared learning and development curriculum will address specific provision of antiracism and cultural awareness training only “where a need is identified”.

One of the core elements of the strategy’s vision is that “the basic values of Irish society are respected by all”. The strategy also states that integration recognises the right of migrants to give expression to their own culture in a manner that does not conflict with the “basic values of Irish society” placing an emphasis on the need for migrants to conform to Irish values without elaborating on what these values are.

2.2.2 Strategy implementation

With regard to implementation, the strategy identifies two types of actions. The first type of actions are those applicable to all Government departments, and include making information available through signs and translated material; training on intercultural awareness; and providing information on how to make a complaint about racist behaviour.

The second type of actions is those which are intended to address particular issues. Some of these are quite specific – such as the inclusion of a target of 1% for the employment of EEA migrants and people from minority ethnic communities in the civil service (in most cases civil service employment is not open to non-EEA nationals) and the monitoring of current school enrolment policies over time to assess their impact on the enrolment of migrant students. Other actions are broad and nebulous (for example, “encourage businesses to focus on integration”; and “migrants will be encouraged to participate in local and national politics to the extent that these areas are legally open to them”).

Finally, while the strategy makes some reference to a limited funding programme which is open to certain bodies, provisions regarding resources and information supports to assist public bodies with implementing the actions are lacking.

2.2.3 Strategy evaluation

The strategy provides that a mechanism will be introduced in order to assess the progress of the measures outlined in the strategy. It is proposed that a strategy committee will be established under the Minister of State at the Department of Justice and Equality with responsibility for Equality, Immigration and Integration, to oversee implementation of the strategy. It seems that the strategy committee will be central to monitoring progress, planning for future needs, and ensuring effective implementation and accountability.

2.2.4 Positive Aspects of the Strategy

Viewed through a human rights and equality lens, the Migrant Integration Strategy contains several positive features in its vision to achieve integration. The first of these positive points is that aside from some limited and under-explored references to “values”, the strategy does not appear to focus on “cultural integration”. It states that migrants should be enabled to celebrate their national, ethnic, cultural and religious identities (subject to the law). A second aspect is its participatory conception of integration: its vision is that migrants are facilitated to play a full role in Irish society. A third positive point is that the strategy recognises the need for better data on issues facing migrants (action 8).

A further positive feature is that some of the actions address some long-standing issues of immigration law. Here, the strategy states that a statutory scheme for long term residency will be introduced (action 11). In addition, measures will be introduced to enable registration of non-EEA migrants aged under 16 years (action 14).

These measures are to be welcomed. Related to this point is another positive in that the Department of Social Protection is to continue to take measures to ensure that the Habitual Residence Condition for welfare payments is applied correctly and consistently (action 21).

2.2.5 Points of Concern

While the Migrant Integration Strategy has strengths from a human rights and equality perspective, there are also some points which cause concern. An initial point of concern is that the vision of the strategy includes, as its first priority, that “The basic values of Irish society are respected by all” and that it does not identify what these values are or might include. A second point of concern is that, as outlined above, there are no express references to human rights principles as such, despite some reference to “equality of opportunity”. The limited nature of references to immigration law is a further point of concern. Access to family reunification and the regularisation of undocumented people are some important long-standing issues which are not dealt with in the strategy. The strategy’s commitment to examine the imposition of a citizenship and/or language tests (action 12) is a further point of concern, as such tests can act as barriers to integration.

The fact that the strategy does not apply to asylum seekers or undocumented migrants, as it only applies to “EEA and non-EEA nationals, including economic migrants, refugees and those with legal status to remain in Ireland” is unsurprising but nonetheless disappointing. This means that direct provision falls outside law and policy once again.

A final potential point of concern is the lack of any reference to relevant research reports, the ESRI’s Annual Monitoring Report on Integration, academic studies of integration and so on. Perhaps this is to be welcomed as it means that the strategy favours a pragmatic approach. However, this could also result in a lack of coherency and the lack of a developed vision of integration and its implications.

2.3 Policy Evaluation

2.3.1 Structural Indicators: Content of the policy documents and policy development

In addition to our analysis of the Migrant Integration Strategy above, we also conducted a review of all policies provided to us by public bodies. We next outline the results of our policy evaluation more generally.

(i) Measures aimed at eliminating discrimination

Many of the policies evaluated (63%) contain commitments to respect and promote equality and diversity. However, only about half of these broad commitments (53%) are matched by specifically identifying practical measures designed to achieve this. Staff training is the practical measure predominantly referred to in the policy documents. Other measures include equality-proofing policies; the production of pamphlets regarding the use of non-discriminatory language; and measures aimed at facilitating social inclusion generally.

Less than one third (30%) of the relevant policies provide for specific measures to meet the needs or promote the interests of migrants, or measures to promote interculturalism. Such policies include intercultural strategies; policies which provide for the translation of key documents or application forms into multiple languages; and policies which refer to specific services provided for migrants or which refer to the implementation of measures to realise certain rights of migrants such as housing, education and healthcare.

A further 7% of the bodies focus mainly on reactive measures in terms of measures to react to incidences of discrimination or placing a negative obligation on staff not to discriminate rather than a positive obligation to respect equality and diversity.

Finally, in the case of 22% of the bodies, the relevant policies focus on equality primarily in terms of recruitment measures. The focus of such a large amount of bodies as being a workplace only is surprising, given that the vast majority of these bodies have external functions which would require interaction with the public.

(ii) References to human rights in policy

The idea of “human rights” is rarely referred to in the policies examined here (less than 10%). Similarly, specific human rights are almost never expressly identified. The right to the enjoyment of the highest attainable standard of physical and mental health and the right to equality are the only human rights which are explicitly referred to.

Case study: A human rights basis for policy provisions

The Irish Prison Service takes a human rights approach to service provision which is underpinned by provisions in its policy documents. The organisation's strategic plan refers to its obligations under Irish, European and international human rights law. It also addresses its promotion of equality and human rights through its policies and day to day operations.

European Union resources are used to inform the incorporation of human rights into the practices of the Irish Prison Service. Different departments within the organisation have designated responsibilities to ensure that the rights which are provided for in its policies are realised in its service provision. This includes tailoring procedures to ensure equality of access to mental healthcare for foreign-national prisoners through the psychology service. Human rights also guide how care is delivered by the psychology service as a result of care-related human rights commitments being enshrined in the policy documents of the Irish Prison Service.

Only 3% of the bodies which responded showed an awareness or understanding of the Public Sector Duty to eliminate discrimination; promote equality of opportunity and treatment of its staff and the persons to whom it provides services; and protect the human rights of its members, staff and the persons to whom it provides services.

Despite the lack of express reference to human rights principles, a variety of human rights are referred to implicitly, in particular the right to equal treatment and freedom from discrimination. In this regard, it was noticeable that the policies produced by external-facing policy-making or regulatory bodies tend to be more pro-active and deal (in an implicit manner) with rights (to housing, education and health, for example) to a greater degree than those devised by bodies with mainly internal functions.

(iii) References to respect for cultural and linguistic diversity

Cultural diversity, linguistic diversity or both jointly are referred to in 46% of the relevant policies. The policies also frequently refer to diversity in a more general sense with 34% of the relevant policies including commitments to "embrace", "value", "respect" or "accommodate" diversity. While the majority of policies therefore, refer to diversity, it should be noted that over 20% of bodies do not contain any references to diversity.

Measures to promote and facilitate cultural and linguistic diversity include:

- projects and initiatives to promote and facilitate intercultural dialogue
- the provision of intercultural training to staff
- the inclusion of ethnic or cultural background questions in monitoring systems, and the provision of interpretation services or translation of information materials into multiple languages

Interestingly, a small number of bodies refer to a commercial justification for embracing diversity with references to cultural and language diversity assisting organisations to succeed in both domestic and global markets.

(iv) Underlying preferences for cultural assimilation; the onus of integration being placed on the individual; or integration testing.

References to cultural assimilation; the onus of integration being on the individual; or integration testing are almost non-existent in the policy documents.

However, there are some indirect references which feature in two specific integration policies, the Migrant Integration Strategy (Department of Justice and Equality 2017) and the Intercultural Education Strategy (Department of Education and Skills 2010). These provisions commit to ensuring "mutual respect for cultural differences, as long as these do not conflict with the fundamental democratic values of society".

2.3.1.1 Lessons on policy development from the case studies

This research has shown that in cases where diversity and inclusion are firmly embedded in the strategic goals of the organisation, they are more likely to be regarded with priority in terms of implementation and associated resourcing. They are also more likely to be included in policy reviews in terms of assessing the success of their implementation.

Case study: Embedding integration and interculturalism in strategic goals

The Chester Beatty Library noted that an important factor for the success of its policies and related diversity and intercultural initiatives was the embedding of intercultural dialogue within its mission statement and as a key strategic priority for the organisation. As a result of this, intercultural engagement is taken into consideration in the organisation's budget to ensure that necessary supports and resources for implementation are made available.

Several of the bodies interviewed reported that there was a more positive approach to policy implementation when stakeholders were involved in the policy development stages either through organically employee-led initiatives or through taking a bottom-up approach to policy development.

Case study: A bottom-up approach to policy development

The experience of Trinity College Dublin has shown that involving staff, students and service-users in a bottom-up approach to policy development can have a positive impact on policy implementation as stakeholders have more of an understanding of, and are more open to, policy measures rather than feeling as though policies are being imposed upon them.

**Case study:
 Employee-led initiatives as a driver for
 policy development**

The Central Bank of Ireland has had an interesting experience in terms of diversity and inclusion policy. Diversity and inclusion first became rooted in the ethos of the organisation through organically staff-driven initiatives such as a women's network and an LGBT network. Following this, the need to encapsulate these positive measures in a type of policy framework became apparent. However, the Central Bank of Ireland emphasised the importance of ensuring that any policy development reflects and respects the natural development of diversity and inclusion measures, and assists their further growth and development without negatively impacting upon the goodwill and bottom-up morale which led to their origination.

A number of the bodies interviewed spoke of policies being successful due to the values of diversity and equality being embedded in the ethos of the organisation, or the ethos of it being the 'right thing to do' rather than heavily compliance-based reasoning for policy development. However, one of the bodies which spoke of the importance of such an ethos and of a bottom-up approach also stated that it can be important to have some compliance focus, as it can help to ensure that the resources required to effectively implement the policies are made available. Another body also spoke of the importance of compliance based measures in ensuring support from senior management and other departments within the organisation, and in ensuring the allocation of the necessary resources for implementation.

This suggests that a positive ethos coupled with a delicate balance of bottom-up, top-down and compliance-based approaches may seem to provide the most effective means of policy development for certain bodies.

2.3.1.2 A gap in high-level policy guidance and support for human rights-based integration policy

Our research reveals a need for government departments and regulatory bodies to take a more proactive approach to establishing and communicating best practice, and to providing guidance on integration policy development to public sector bodies.

Only 6% of the policies evaluated referred to national Migrant Integration Strategy, despite its 76 specific actions being 'owned' by organisations across the public sector. Some of the bodies interviewed also reported a lack of knowledge of certain issues such as the Migrant Integration Strategy, the Public Sector Duty and how to incorporate a positive human rights obligation into their work.

**Case study:
 Providing support for implementation of
 the Migrant Integration Strategy**

Representatives of Limerick City and County Council emphasised the importance of support for the implementation of the Migrant Integration Strategy. This includes timely notification of new policies and strategies, including to senior management to ensure their support across the public body as a whole; the need for accompanying guidelines; and the necessity for implementation plans and associated financial resources. They also commented on the importance of measures to hold public bodies accountable for their non-implementation of allocated actions.

In the absence of support from domestic policy-making bodies, most interviewees spoke of looking to other bodies in the sector, or to similar bodies in the UK, for examples of best practice. One of the bodies also spoke of the importance of practical guidance received from the Equality Authority in the past.

A small number of bodies referred to receiving support from non-government organisations (NGOs) or to collaborating with NGOs to inform their policies or policy initiatives. A couple of the organisations referred to meeting with a particular named NGO or attending information seminars held by the NGO regarding integration policy development. A number of bodies referred to collaborating with NGOs on integration related awareness campaigns.

**Case study:
 Benefits of collaboration with NGOs in
 policy development**

Limerick City and County Council has collaborated with NGOs for over seven years through the Limerick Integration Working Group. Through the Integration Working Group, the Council has worked alongside NGOs to develop and implement two successive integration strategies with the drafting of a third strategy currently being finalised. The Council stated that they are very fortunate to have the expertise of the NGOs, and that a lot has been learnt from this expertise. It was also said that working with the NGOs through the Integration Work Group has helped the Council to really envision what could be achieved in relation to integration in Limerick.

However, it was also emphasised that NGOs have limited resources and that goodwill in providing guidance and resources can only extend so far. It was asserted that there is a real need for a long term solution to adequately support and resource local authorities and other public bodies to develop and implement integration policies.

It appears that some public bodies are experiencing difficulty in understanding how human rights relate to them as organisations, and in understanding what is expected of the organisations in that respect. A knowledge gap as to how the Public Sector Duty applies to public bodies which do not have a public-facing function was also expressed. A number of the public body representatives also spoke of the negative connotations around "human rights" and related language.

One of the public bodies interviewed had an understanding of the Public Sector Duty and has begun work in implementing it into its policies and practices as part of a pilot programme with the Irish Human Rights and Equality Commission.

Case study:

Human rights in Dublin Bus

In setting out to reflect human rights principles, the first step which Dublin Bus has taken is to identify what human rights means for it as organisation. It has looked at various aspects such as access to education, and realises that human right by providing education and training. It has also been setting out what human rights mean to it as an organisation by tying human rights into the four core Dublin Bus values; customers, employees, safety and community. The next step which Dublin Bus has identified is to look at department separately, and to encourage the management and staff of each department to identify what human rights mean for them. As this is happening, principles are being established around which a human rights statement will be formed.

While Dublin Bus has demonstrated positive experience, another large public body had no knowledge or understanding of the Public Sector Duty while a third body has been struggling to understand how the Public Sector Duty relates to it as an organisation.

2.3.2 Process: Implementation of the policy

(i) Staffing and budgetary allocations for policy implementation

Only 17% of the bodies with relevant policies refer to a budget or resource allocation being available for the implementation of the policies.

Human resources managers, human resources departments generally and directors of corporate affairs are most frequently responsible for ensuring the implementation of the policies. Some bodies have a specific staff allocation in the form of an Equality Officer, Equality and Diversity Officer or Integration Officer (17%). Other policies (7%) refer to a committee-style body. Over half of the policies studied do not identify any position or department of responsibility for ensuring the implementation of the policy. This lack of ownership could result in a lack of accountability for any failures to properly implement policies.

Staff training was the key action referred to in the policies as a means to assist staff with understanding equality and diversity issues, and thereby aiding policy implementation. Other actions included the provision of guidance manuals or practical leaflets to staff on intercultural and diversity issues.

Case study:

Proactive practical resources for staff

In implementing its Equality and Diversity Strategy, Dublin Bus published a short and practical leaflet for staff on "Diversity in the Workplace" which sets out the core points of the strategy and the organisation's key actions in achieving equality and diversity. The leaflet also includes important definitions related to diversity and equality to help staff understand the meanings of minorities and the various types of discrimination. A second leaflet, "Words to Watch", sets out practical guidelines on avoiding inappropriate language, jokes and comments. It clearly sets out words that should be avoided alongside acceptable words which can be used in their place. These leaflets were both approved by NALA to ensure that the resources are accessible to as wide an audience as possible.

Case study:

Proactive practical resources for service-users

In implementing its policy of ensuring access to psychology services, the Irish Prison Service developed short practical multi-lingual resources containing key information on the psychology service to ensure equal access to services for foreign-national prisoners.

Other policy measures included tailoring service provision slightly to meet the needs of migrant service-users including the provision of translation or ensuring culturally inclusive service provision.

Case study:

Making public services accessible to all service-users

A positive example can be seen in the approach of the Irish Prison Service which views its psychology services as a service to which access must be assured. As a service, it must focus on the needs of prisoners, and determine how those needs can be met for foreign-national prisoners. The experience of the Irish Prison Service has shown that when there is a concrete procedure in place for providing services to foreign-nationals, there is no uncertainty about service-provision, as staff are aware of the minor adjustments which have to be made in order to provide services appropriately. This ensures that integration is facilitated by service provision.

Further policy measures included implementing targeted actions to address the specific needs of migrants or to address particular gaps in service provision to migrants within the catchment area of the public body.

**Case study:
 Considering integration objectives with
 reference to the specific needs of migrant
 service users**

Limerick City and County Council collaborated with the Limerick Integration Working Group in conducting needs-based analysis through focus groups, drawing from the experiences of service providers and mapping service provision for migrants in Limerick. This needs-based analysis was used to inform the identification of targeted integration strategy actions to address each of the needs and service gaps. This process helped to ensure that the implementation of the integration strategy enabled migrants to access services appropriate to their specific needs.

While there are undoubtedly positive examples of policy measures being undertaken, a large number of public bodies do not pursue such measures. Furthermore, the vague, generic nature of some of the policies suggests that there may be a lack of understanding of, or engagement with, the relevant issues across many public bodies.

Another factor which can impact upon policy implementation is the backing of senior management for policy development and implementation. This can ensure effective implementation as support from upper levels of management can generate firm commitments to policy implementation and remove potential obstacles. A number of the bodies interviewed also stated that support from senior management is crucial in terms of ensuring that the financial resources necessary for policy implementation are made available.

**Case study:
 The importance of support from senior
 management**

The Central Bank of Ireland's experience is that senior buy-in has been extremely important in the success of diversity and inclusion initiatives throughout the Bank. The involvement of senior management in the organisation's Women's Network and LGBT Network (which was launched by the Governor) has sparked organisation-wide support and interest which helped these networks to grow and develop. The support of the Deputy Governor, Prudential Regulation in taking an active role in driving the organisation's Diversity and Inclusion Steering Group was also highlighted as a key factor in the success of diversity and inclusion initiatives.

It is, therefore, important that central government leads the way in generating understanding and support among senior management figures.

(ii) Coverage of target populations

Assessing coverage of target populations based on the policy documents alone has proved difficult, as the vast majority do not contain sufficient detail. It was hoped that policy reviews or assessments of annual policy successes in organisational annual reports could enable an evaluation of the coverage of target populations to be carried out.

However, publicly available policy reviews are lacking, and a considerable amount of the bodies do not refer to the relevant policies in their annual reports.

(iii) Policy mainstreaming

Only a handful of the policies make explicit reference to the mainstreaming of their policies. However, it is clear from the language used in other policies that it is intended for the policies to be embedded across the organisation. However, lack of policy evaluation and follow-up on policy success in annual reports renders it very difficult to assess the extent to which this occurs in practice.

(iv) Provision for follow-up in the annual reports of public bodies

The inclusion of follow-up in the annual report could act as a means of evaluating the success of the policy implementation during the reporting period.

However, very few of the policies (11%) contain any provision for follow-up in the annual report. In addition, only one quarter of these bodies actually met their commitment to do so.

2.3.3 Outcomes: Evaluation of the policy

Overall, it has proved difficult to assess how successful the policies have been solely on the basis of the policy documents provided. It appears that the formal evaluation of the success of these types of policies is quite rare.

(i) How, and by whom, is the effectiveness of the policy measured?

Where references to policy review are included, 60% of the relevant policies do not refer to whom the policy evaluation will be carried out by, and 72% do not include a time frame for the review of policies. Where references to policy review or evaluation are included, they can also be quite imprecise with commitments to policies being "subject to review and amendments where appropriate", "kept under review" or "reviewed at regular intervals".

Only 30% of the policies refer to how the policy evaluation will be conducted. Such means of measurement included:

- Data collection and monitoring on workforce diversity, types of complaints received etc.
- Surveys to assess staff and customer perceptions of equality and diversity issues
- Other stakeholder feedback mechanisms
- Establishing, and monitoring progress on, success indicators or policy milestones
- Internal audits and progress reports
- Steering groups and liaison with management and staff

Case study: Feedback from designated staff representatives as a means of policy evaluation

In order to gain feedback on diversity and equality issues from staff for the purposes of policy evaluation, Dublin Bus discusses relevant issues with its designated depot champions. These depot champions act as representatives of the staff in each of the various bus depots. The opinions and feedback of these depot champions is sought, and is then used to feed into measurements of policy success.

Another means of policy evaluation is also being rolled out by Dublin Bus which involves the gathering of feedback from staff through a mobile phone application. Staff receive push notifications from the application regarding requests for opinions based on a number of concise issues. This can prove effective in situations where there is a wide geographical dispersal

While some public bodies have demonstrated positive practice in terms of policy evaluation, one third of the policy documents simply do not include any provisions for the review or evaluation of policy documents. This could either mean that the methods of measurements are not included in the policy documents, or that many of the policies are not evaluated at all.

A potential barrier to policy measurement which arose during the research was a lack of available data to confirm whether or not specific policy measures have been successful. Several of the bodies interviewed referred to issues in gathering data to assess the impacts of policy measures.

This is particularly true in the case of data to establish whether quotas have been met, for example: the quota included in the Migrant Integration Strategy which sets a target of 1% for the employment of EEA migrants and people from minority ethnic communities in the civil service by 2020. Issues with gathering data seemed to largely relate to the sensitive nature of the data required and to how that data could be gathered from employees without arousing suspicion. A further issue was acquiring the resources required for data collection.

(ii) Addressing the policies in the annual reports of public bodies

One quarter of the bodies with relevant policies addressed the success of those policies in their annual reports. The more detailed references included performance-based factual statements outlining the relevant progress and successes made by the organisation during the previous year. However, the references also included brief compliance-based statements regarding a body's continued adherence to the relevant equality legislation. Almost half of the bodies with relevant policies included no follow-up on those policies in their annual reports.

(iii) Policy successes in allowing migrants to enjoy human rights

For the vast majority of the bodies, it is not possible to make any assessment of the success of their policies in allowing migrants to enjoy human rights. This is largely due to the vague nature of many of the policies and the lack of references to policy implementation measures which reflect human rights principles. These factors are compounded by the lack of policy evaluation or references to progress of policy implementation in the annual reports of the bodies which makes it virtually impossible to assess the success of the policies in allowing migrants to enjoy human rights.

Chapter 3

Conclusions and Recommendations

Our audit and evaluation of the integration policies of public bodies in Ireland clearly demonstrates that the ambitious vision set out in the Migrant Integration Strategy, whereby “Integration policies and measures are mainstreamed in the work of all Government Departments and agencies, local authorities and other public bodies and organisations”, is not yet being realised.

There are some positive findings. These include the lack of negative references to integration and human rights, and the existence of examples of good practice in some public bodies. However, a striking outcome of our audit of integration policies is that only 5% of the public bodies we contacted provided us with a policy or other document that explicitly mentioned migrant integration. We conclude that public bodies in Ireland need to be more explicit in how they address the broader question of migrant integration, particularly given the vision of the Migrant Integration Strategy.

We assert that a significant opportunity exists in Ireland in relation to the development of clear, coherent and focused migrant integration policies that acknowledge the reality of Ireland as an immigrant-receiving country. We argue that a human rights-based approach to integration, drawing on best practice in International Human Rights Law, is particularly appropriate for the Irish context, and would allow Ireland to become a leader in integration policy development. A human rights based approach to integration is facilitated by the Public Sector Duty in the Human Rights and Equality Commission Act 2014. This is a positive duty to promote and protect human rights, rather than simply to prevent breaches of human rights. In relation to migrant integration, which we understand as the full realisation of the human rights of migrants and their inclusion as equal members of society, this involves equality of opportunity, the elimination of discrimination, the promotion of tolerance and respect, and a recognition of shared responsibility for achieving integration.

However, our research shows that, within public bodies in Ireland, there is a clear need for greater understanding of the positive duty to promote and protect human rights rather than to prevent breaches of human rights, particularly with reference to integration.

We believe that national policy-making bodies must take a stronger leadership role in relation to migrant integration. In doing so, national policy-making bodies should build on the existing legislative equality framework and the Public Sector Duty, and develop this to include the broader process of integration. In doing so, public bodies should be informed by international approaches to human rights and equality, which include those adopted by the UN human rights treaty monitoring bodies. We have obligations to provide for migrant integration under International Human Rights Law and a state responsibility for inclusion. Public bodies, therefore, have:

- A human rights duty to employees and suppliers;
- A duty to reflect human rights in their policy making and regulatory roles; and
- A duty, as service providers, to reflect human rights perspectives in access to public services.

In order to realise these obligations, we make the following recommendations for supporting the development of integration policies in public bodies in Ireland.

Supporting the development of integration policies in public sector bodies

- Education and training programmes such as ‘Train the trainer’ type initiatives on reflecting human rights in policies, the Public Sector Duty, and actions to facilitate the implementation of the Migrant Integration Strategy should be provided to public bodies. Training should also be tailored, where appropriate, to reflect the capacity of smaller public bodies. A particular focus could be the positive human rights obligation and challenging the negative perceptions surrounding “human rights”. Public bodies could be guided in reflecting human rights and related language in policies without appearing as though the policies are overly focused on compliance.
- Sector-wide roundtables should be held with key public management figures to inform and generate support for integration issues. Organisations which have demonstrated best practice in terms of a human right-based approach to integration, or which have successfully participated in the Public Sector Duty pilot study currently being conducted by the Irish Human Rights and Equality Commission, should be invited to present to other key representatives of public sector management.
- Practical resources should be made available to public bodies to assist with conducting a human rights impact assessment or diversity proofing their policies. Existing resources should also be widely promoted across the public sector to increase awareness of their availability.

- Resources and guidance should be provided to public bodies to assist with reviewing and evaluating their policies. Guidance on implementing the findings of such evaluation in policy revision may be required. Public bodies could also benefit from supports in relation to data collection and monitoring. In particular, guidance around data collection could be vital in terms of establishing whether quotas have been.
- Government departments and larger public bodies should lead by example in ensuring that sector-specific integration strategies are evaluated and reviewed. Successes should be identified, and examples of best practices or important lessons highlighted and acted upon in policy revision. While also ensuring best practice, this could act as a model to inform the policy review of bodies across the public sector.
- An integration forum should be established to act as a support mechanism for public bodies in policy development, implementation and review. This could also provide a platform for public bodies to share experience, and learn from best practice.

Developing and implementing an integration policy in a public body

- Policy development should ensure that policies relate to the functions or purposes of the body, and that integration objectives are considered with reference to the nature of the work of the body and the needs of its stakeholders.
- Integration objectives should be clearly set out in the strategic plans, or other core documents, of the organisation.
- Staff and other stakeholders should be facilitated to play an active role in integration policy development, implementation and review. Both bottom-up and top-down approaches should be explored to determine an appropriate balance for ensuring a cohesive approach to policy implementation.
- Mechanisms for policy review or evaluation should be a key factor in integration policy development, and should be clearly outlined within each relevant policy.

Chapter 4

Practical Guidelines for Public Bodies

The following guidelines may prove useful to public bodies in developing, implementing and drafting human rights-based integration policies.

In order to ensure that an effective policy framework is developed, it is advised that public bodies:

Integration policy development

- Identify the specific human rights relevant to its work and stakeholders, and review how the human rights dimension interacts with the established values of the organisation.
- Refer to census data and other publicly available statistical information to establish the demographics of the population in the areas for which the public body has responsibility to provide services.
- Review the organisation's existing policies, strategies and procedures with regard to the incorporation of integration issues and objectives which may impact upon the organisation's stakeholders.
- Clearly set out human rights-based integration objectives in the strategic plans, or other core documents, of the organisation.
- Ensure that all stakeholders are consulted during the policy development stage and that feedback is used to inform policy drafting.

- Seek support for policy from senior management within the organisation at the earliest possible point. Positive examples could be drawn from initiatives of other public bodies to highlight the importance of such measures receiving support from high-level management.
- Ensure that policies are tailored to the functions or purposes of the body, and that integration objectives are considered with reference to the nature of the work of the body and the needs of its stakeholders. This could include framing policy development in the context of the human rights duty which a body has to its employees and suppliers, to its service-users, and to reflect human rights in their policy making and regulatory roles.
- In incorporating human rights duties into integration policy drafting, the following resources may be useful to public bodies:
 - Resources produced by the Irish Human Rights and Equality Commission (see, for example, The Public Sector Duty – Eliminating discrimination, promoting equality and protecting human rights, IHREC, August 2016 https://www.ihrec.ie/app/uploads/2016/09/ihrec_public_duty_booklet.pdf).
 - Resources produced by the Equality and Rights Alliance (see, for example, A New Public Sector Equality & Human Rights Duty, ERA, March 2015 <http://www.eracampaign.org/uploads/A%20New%20Public%20Sector%20Duty%20March%202015.pdf>).
 - The Migrant Integration Strategy: A Blueprint for the Future. (Department of Justice and Equality, February 2017, [http://www.justice.ie/en/JELR/Files/Migrant Integration Strategy English.pdf](http://www.justice.ie/en/JELR/Files/Migrant%20Integration%20Strategy%20English.pdf)). Public bodies are advised to consult the Migrant Integration Strategy with regard to specific integration actions which may be allocated to certain bodies directly or actions assigned to public bodies generally.

Integration policy implementation

- Draft an implementation or action plan to clearly set out the steps or measures which will be taken to implement the policy, identify a department or position of responsibility for each action and determine a realistic timeline for implementation. All relevant stakeholders should be included in this process. Bodies may also consider establishing an internal equality committee-type body made up of senior management, staff and other relevant stakeholders.
- Ensure that adequate staffing and financial resources are allocated to policy implementation.
- Put in place training and awareness initiatives for all staff regarding the policies and the importance of integration objectives.
- Ensure that policy implementation is mainstreamed across each department of the organisation. Each department should have a clear awareness of the policy provisions, its individual implementation responsibilities, and the actions it should take to fulfil those responsibilities.

Integration policy review or evaluation

- Include mechanisms for policy review or evaluation as a key factor in policy development, and ensure that they are clearly outlined within each relevant policy. Mechanisms could include establishing clear integration indicators, setting specific targeted goals or actions, holding stakeholder consultations or the use of other feedback mechanisms. Mechanisms for any data collection needed to inform policy evaluation should also be considered.
- Ensure that sufficient resources are allocated to policy review and evaluation. This should take into account staffing hours or technology which may be required to undertake policy evaluation.
- Identify successes and examples of best practices or important lessons highlighted during the policy evaluation stage, and ensure that they are discussed at management level and incorporated into policy revision.
- Ensure successes of the policies are addressed in the annual report of the body as a form of policy evaluation, as an accountability mechanism and to raise awareness of the positive measures being undertaken.

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Appendices

Appendix 1: Original request letter

<<Address>>

<<Date>>

<<Greeting line>>

We are writing to request the assistance of the «Name_of_Body» with an Irish Human Rights and Equality Commission funded research project being carried out by the Maynooth University Social Sciences Institute.

The research project focuses on the development of a policy framework for migrant integration and is being undertaken by Professor Mary Gilmartin and Dr Clíodhna Murphy of Maynooth University.

As part of this research project, we are collating the policies and/or strategy documents of public bodies (including bodies which come under the definition of public bodies for the purposes of the Regulation of Lobbying Act 2015) which relate to migrant integration, diversity or interculturalism. A database of all policies will be compiled and policies will also be used to inform the research findings. Excerpts of policies may be included in the final research report. We ask that you kindly forward copies of relevant policies and/or strategy documents addressed to Leanne Caulfield by post to the address below or by email to <<email address>> by the <<deadline>>.

Should no response be received to this request, it will be assumed that there are no relevant policies or strategy documents in place.

We are grateful for your assistance with this research. Please do not hesitate to contact us should you have any queries.

Yours faithfully,

Professor Mary Gilmartin

Dr Clíodhna Murphy

Appendix 2: List of public bodies which responded to the research request

This list retains the corresponding number for each body from the complete database of the 432 public bodies contacted. The gaps in numbering, therefore, indicate those bodies which did not respond.

	Name of Body
2	Adoption Authority of Ireland
3	Agriculture Appeals Office
4	Allied Irish Bank
5	An Post
7	Animal Remedies Consultative Committee
8	Aquaculture Licence Appeals Board
10	Army Pensions Board
11	Arts Council
13	Beaumont Hospital
14	Blood Transfusion Service Board (Irish Blood Transfusion Service)
16	Bord Altranais
17	Bord Bia
21	Bord Pleanála
22	Broadcasting Authority of Ireland
23	Brothers of Charity Services
25	Bus Éireann
35	Central Bank of Ireland
37	Central Statistics Office
40	Chester Beatty Library
41	Child and Family Agency
43	Chomhairle um Oideachais Gaeltachta agus Gaelscolaíochta
44	Circuit Court Rules Committee
45	Citizens Information Board
46	City of Dublin Education and Training Board
47	Clare County Council
51	Coimisinéir Teanga
53	Commission for Aviation Regulation
54	Commission for Communications Regulation
56	Commission for Public Sector Appointments
59	Commission for the Support of Victims of Crime
63	Committee on Court Practice and Procedure
64	Committee for Judicial Studies
65	Companies Registration Office
71	Córas Iompar Éireann
76	CORU
77	Council of Defence
78	Council of National Cultural Institutions
81	Crawford Art Gallery

85	Criminal Assets Bureau
89	Defence Forces Canteen Board
90	Dental Council
91	Department of Agriculture, Food and the Marine
93	Department of Children and Youth Affairs
94	Department of Communications, Climate Action and Environment
95	Department of Defence
96	Department of Education and Skills
97	Department of Finance
98	Department of Foreign Affairs and Trade
99	Department of Health
100	Department of Housing, Planning, Community and Local Government
101	Department of Jobs, Enterprise and Innovation
102	Department of Justice and Equality
103	Department of Public Expenditure and Reform
104	Department of Social Protection
105	Department of the Taoiseach
106	Department of Transport, Tourism and Sport
110	Discovery Programme Ltd.
113	Donegal Education and Training Board
115	Dublin Airport Authority
117	Dublin Bus
118	Dublin City Council
119	Dublin City University
126	Dún Laoghaire-Rathdown County Council
127	Dundalk Institute of Technology
128	Eastern and Midland Regional Assembly
129	Economic and Social Research Institute
131	Eirgrid
132	Electricity Supply Board
133	Enterprise Ireland
135	Ervia
140	Fingal County Council
141	Food Safety Authority of Ireland
144	Forensic Science Ireland
151	Garda Síochána
153	Garda Síochána Ombudsman Commission
154	Gas Networks Ireland
156	Geological Survey of Ireland
158	Grangegorman Development Agency
159	Health and Safety Authority
162	Health Products Regulatory Authority
163	Health Research Board
164	Health Service Executive
167	Higher Education Authority
170	Houses of the Oireachtas Commission
171	Housing Agency

172	Housing Finance Agency Plc
173	Iarnród Éireann
174	IDA Ireland
175	Incorporated Orthopaedic Hospital of Ireland (Clontarf Hospital)
178	Institute of Public Administration
179	Institute of Public Health in Ireland
180	Institute of Technology Blanchardstown (ITB)
182	Institute of Technology Sligo (IT Sligo)
186	International Protection Appeals Tribunal
187	Investor Compensation Company Ltd.
188	Irish Auditing and Accounting Supervisory Ltd.
189	Irish Aviation Authority
190	Irish Expert Body on Fluorides and Health
193	Irish Financial Services Appeals Tribunal
194	Irish Fiscal Advisory Council
195	Irish Human Rights and Equality Commission
196	Irish Legal Terms Advisory Committee
197	Irish Manuscripts Commission Ltd.
200	Irish National Accreditation Board
201	Irish National Stud Co. Ltd.
202	Irish Naturalisation and Immigration Service
203	Irish Patents Office
204	Irish Prison Service
207	Irish Research Council
209	Irish Takeover Panel
211	Irish Water
212	Irish Water Safety
213	Irish Youth Justice Service
214	Judicial Appoints Advisory Board
221	Kilkenny County Council
222	Labour Court
223	Laois and Offaly Education and Training Board
224	Laois County Council
226	Law Reform Commission
227	Law Society of Ireland
228	Léargas
233	Licensing Authority for Sea fishing boats
235	Limerick City and County Council
237	Local Government Management Agency
239	Longford County Council
240	Loughs Agency
241	Louth County Council
242	Louth Meath Education and Training Board
243	Marine Casualty Investigation Board
245	Mary Immaculate College
246	Marymount University Hospital and Hospice
248	Maynooth University
251	Meath County Council
253	Medical Council
254	Mental Health (Criminal Law Review Board)
255	Mental Health Commission
259	Microfinance Ireland
261	Mining Board
262	Monaghan County Council
265	National Archives
266	National Asset Management Agency
268	National Cancer Registry
270	National Centre for Guidance in Education
273	National Competitiveness Council
275	National Council for Curriculum and Assessment
279	National Disability Authority
280	National Economic and Social Council
281	National Economic and Social Development Office
284	National Haemophilia Council
285	National Library of Ireland
287	National Milk Agency
288	National Museum of Ireland
289	National Office for the Prevention of Domestic, Sexual and Gender-based Violence (COSC)
290	National Oil Reserves Agency
291	National Paediatric Hospital Development Board
294	National Standards Authority of Ireland
295	National Statistics Board
296	National Transport Authority
297	National Traveller Accommodation Consultative Committee
300	National University of Ireland Galway
302	North/South Ministerial Council
305	Office of Government Procurement
306	Office of Public Works
309	Office of the Chief State Solicitor
311	Office of the Comptroller and Auditor General
314	Office of the Data Protection Commissioner
316	Office of the Director of Public Prosecutions
317	Office of the Disability Appeals Officer
319	Office of the Inspector of Prisons
320	Office of the Ombudsman
321	Office of the Ombudsman for Children
322	Office of the Press Ombudsman
325	Office of the Revenue Commissioners
327	Ordnance Survey Ireland
330	Parole Board
332	Peatlands Council
333	Pensions Authority
334	Pensions Council
335	Personal Injuries Assessment Board
339	Policing Authority
340	Port of Cork Company

341	Port of Waterford Company
344	President's Establishment
345	Press Council of Ireland
347	Probation Service
349	Public Appointments Service
353	Radio Telefís Éireann
354	Reception and Integration Agency
355	Referendum Commission
358	Residential Institutions Redress Board
359	Residential Tenancies Board
360	Road Safety Authority
362	Rotunda Hospital
363	Royal College of Physicians in Ireland
364	Royal College of Surgeons in Ireland
369	Safe Food - Food Safety Promotion Board
370	Saint Michael's House
371	Saint Vincent's University Hospital
372	Science Foundation Ireland
373	Sea Fisheries Protection Authority
376	Shannon Group plc
377	Skillsnet Ltd.
381	South Dublin County Council
383	Special European Union Programmes Body
384	Sport Ireland
393	Standards in Public Office Commission
396	State Laboratory
397	State Pathologist's Office
400	Student Grants Appeals Board
401	Superior Court Rules Committee
402	Sustainable Energy Authority of Ireland
403	Tallaght Hospital
404	Tax Appeals Commission
405	Teaching Council
406	Teagasc
407	Telefís na Gaeilge
410	Tipperary Education and Training Board
413	Trinity College Dublin
418	University of Limerick
419	Valuation Office
422	Victims of Crime Office
425	Waterford City and County Council
427	Waterways Ireland
428	Western Development Commission
429	Westmeath County Council

Appendix 3: Information Sheet and Informed Consent

Information Sheet: “All the Children of the Nation”: Integration policy in Ireland through the lens of human rights and equality

You have been invited to take part in the research study, along with around 7 other people, because of your role in the development and/or implementation of an integration policy document in a public body that we believe represents best practice. The information sheet explains the nature of the study, and what we will be asking you to do in the interview. It also explains how your interview will be used.

About the research

This research is called “**All the Children of the Nation**”: **Integration policy in Ireland through the lens of human rights and equality**. It is funded by the Irish Human Rights and Equality Commission, and uses international human rights and equality standards as a basis for assessing integration policies in Irish public bodies. We have completed a study of the integration policies across public bodies in Ireland. The interviews will contribute to a better understanding of the process of developing effective integration policies. Information from the interviews may be used in public presentations and/or publications, such as working papers, reports, journal articles or book chapters.

The project is based at Maynooth University. The principal investigators are Professor Mary Gilmartin (Department of Geography) and Dr Clíodhna Murphy (Department of Law). Researcher Leanne Caulfield will also participate in the project.

About the interviews

A researcher will visit you in a place of your choosing. The interview will last for around one hour. The researcher will ask questions about the background to the development of the policy; resources that you used; how you overcame opposition; lessons learned that may be of use to other public bodies; and measures for assessing the effectiveness of the project.

With your permission, the interviews will be audio-recorded and afterwards transcribed. The information obtained (notes and audio recordings) will be securely stored on a password-protected computer or in a locked cabinet at Maynooth University, and will be accessible only to the researchers. You will be able to access this information at any time by contacting Professor Mary Gilmartin. Please note that audio recordings will be deleted and overwritten when they have been transcribed, and interview transcripts will be deleted and overwritten (electronic) or shredded (paper) after ten years.

If you wish to be identified in any presentations or publications, we will provide you with a copy of the transcribed interview for your approval. We will also ask you to let us know how you would like to be identified in presentations or publications.

We will ask your permission if we wish to use information from the interview in presentations or publications that are not directly related to this specific project.

If you do not wish to be identified in presentations or publications, all information obtained from you during the research will be kept confidential. Your interview recording and transcript will be identified by a code number, and your name will be kept separate. Identifying information about you will not be used in any reports of the research or in any publications that draw on the research. The only exceptions to the confidentiality of the information are if your welfare or the welfare of another person is at risk, if you tell us about a serious crime you intend to commit, or if we are legally obliged to disclose the information (e.g. by courts in the event of litigation or in the course of investigation by lawful authority). It is unlikely this will happen, but you should keep this in mind when providing information or answering questions during the interview.

Your participation in this research is voluntary. You are free to refuse to take part at any time or withdraw your permission to use the audio-taped interview in the research at any time, without giving a reason, up until the research is published. You may refuse to answer any questions and may stop taking part in the study at any time without disadvantage.

Questions

If you have any questions about the research, you can contact either of the Principal Investigators, Professor Mary Gilmartin or Dr Clíodhna Murphy.

Contact details:

Professor Mary Gilmartin

Maynooth University Department of Geography,
Maynooth, Co. Kildare.
Telephone: 01 708 6617
Email: mary.gilmartin@nuim.ie

Dr Clíodhna Murphy

Maynooth University Department of Law,
Maynooth, Co Kildare
Telephone: 01-474 7218
Email: clíodhna.murphy@nuim.ie

If during your participation in this study you feel the information and guidelines that you were given have been neglected or disregarded in any way, or if you are unhappy about the process, please contact the Secretary of the Maynooth University Ethics Committee at research.ethics@nuim.ie or +353 (0)1 708 6019. Please be assured that your concerns will be dealt with in a sensitive manner.

Consent Form

Research Title: “All the Children of the Nation”: Integration policy in Ireland through the lens of human rights and equality

Please answer each statement below concerning the collection and use of the research data.

1	I have read and understood the information sheet.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
2	I have been given the opportunity to ask questions about the study.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
3	I have had my questions answered satisfactorily	Yes <input type="checkbox"/>	No <input type="checkbox"/>
4	I understand that I can withdraw from the study at any time, without having to give a reason, up until the research is published.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
5	I agree to the interview being audio recorded and to its contents being used for research purposes.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
6	I agree to being named in any presentations or publications that result from this research	Yes <input type="checkbox"/>	No <input type="checkbox"/>
a	If yes: I understand that I will be provided with a copy of the interview transcript for my approval Please indicate how you would like to be identified in presentations or publications:	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b	If no: I understand that I will not be named in any presentations or publications that result from this research	Yes <input type="checkbox"/>	No <input type="checkbox"/>
7	I wish to be notified of any presentations or publications that result from this research. If yes, please provide contact details below	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Name (printed)

Signature Date

We appreciate your valuable contribution. Please feel free to contact us if you have any further questions.

Principal Investigators:

Professor Mary Gilmartin, Maynooth University Department of Geography, Maynooth, Co Kildare. Tel: 01-708 6617. Email: mary.gilmartin@mu.ie

Dr Clíodhna Murphy, Maynooth University Department of Law, Maynooth, Co Kildare. Tel: 01-474 7218. Email: clíodhna.murphy@mu.ie

Researcher: Leanne Caulfield, Maynooth University Department of Law, Maynooth, Co Kildare. Tel: 01-474 7265. Email: leanne.caulfield@mu.ie

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