	Appendix 2
Draft Refugee Integration Strategy for Northern Ireland 20	21-2026

2021 0

Consultation Document

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Section 1 – About This Consultation

1.1 Background

The Executive's Racial Equality Strategy 2015-2025 provides a framework for Government departments to tackle racial inequalities and to promote and encourage good race relations and social cohesion for Irish Travellers, minority ethnic people whose families have been here a number of generations or who have recently arrived, migrant workers and asylum seekers. The Racial Equality Strategy states there is a strong case for a separate Refugee Integration Strategy, to ensure a smooth transition between being an asylum seeker and a refugee and to ensure that refugees can build a new life here and realise their full potential. Accordingly this draft Refugee Integration Strategy has been developed for consultation.

The draft Strategy has been developed and informed through research and engagement with stakeholders with expertise in the area. A report was commissioned by The Executive Office from Queen's University Belfast on the experiences of asylum seekers and refugees in Northern Ireland. The report helped to focus the Strategy on the main areas raised by those interviewed.

https://www.gub.ac.uk/home/media/Media,784971,en.pdf

Since 2015 we have welcomed over 1800 refugees through the Syrian Vulnerable People Resettlement Scheme. We are keen that the knowledge, experience and systems developed through this are shared and used for the benefit all refugees and new comers. The Executive Office, working with the Department for Communities and the NI Innovation Lab, held a two day Strategic Insight Lab to look at the question **How do we enable refugees and the communities in which they live build a cohesive sustainable future together?** The event was attended by representatives from Government departments, councils, community groups and academia. A number of recommendations were made focusing on gaps in services, challenges and opportunities. These have also been used to inform the development of the Strategy.

1.2 Purpose of this Consultation

We are now seeking views on the draft Refugee Integration Strategy which has been developed. We want to ensure the final Strategy is one that focuses all our efforts on the support required to enable integration at all levels. The Strategy should set the strategic direction for all who have a role to play, whether they are from statutory organisations or the voluntary sector or members of local communities.

This consultation is therefore intended to seek the views of all stakeholders to ensure the final Strategy is focused on the priority issues and needs and sets out the most important actions that must be taken to support Refugees and asylums seekers here.

Section 2 – How to respond

2.1 Duration and closing date

The consultation will commence on **12.00 on 29 November 2021** and last for 12 weeks. It will close on, **23.59 on 20 February 2022** and all responses will be welcomed up to that date. Please note that late responses will not be accepted.

Section 3 of this Questionnaire sets out the key elements of the Strategy to assist you in providing your views.

2.2 Submit a written response

Consultees are encouraged to complete the questionnaire online or, if preferable, submit in hard copy. However, should you wish to provide alternative input or have difficulty responding in this way, you can submit a written response. This can be sent in hard copy or email to the address set out in paragraph 2.5.

2.3 Public Consultation Events

It is intended to hold public consultation events to provide an overview of the draft Strategy and enable stakeholders to ask questions and feed in their views. Given the ongoing pandemic these events will be held virtually and you can contact us at race.equality@executiveoffice-ni.gov.uk for details.

The key views gathered at these event will be summarised and used as part of the consultation analysis to inform the final Strategy.

2.4 Engaging those with lived experience

In order to ensure we seek the views of those with lived experience, we will be taking forward facilitated engagement with small groups which will be used alongside the other responses to inform the final strategy

2.5 Enquiries and Responses

Please address any enquiries you may have and responses to:

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

In writing: Racial Equality Unit

E3.18

Castle Buildings

Stormont Estate

BELFAST

BT4 3SG

2.6 How we will use your responses

A summary of responses will be published on the TEO website following the consultation process. Any contact details or information that would identify a respondent as a private individual will be removed prior to publication. All information will be handled in accordance with the Data Protection Act 1998 (DPA).

Respondents should also be aware that the Department's obligations under the Freedom of Information Act 2000 (FOIA) may require that any responses, not subject to specific exemptions under the Act, be communicated to third parties on request.

2.7 Alternative Formats

An electronic version of this document is available at

https://consultations.nidirect.gov.uk/teo/refugee-integration-strategy-for-northern-ireland. Copies in other languages and formats (including Braille, large print etc.), can be made available on request. If it would assist you to access the document in an alternative format or language other than English, please contact us by e-mail at

<u>Race.Equality@executiveoffice-ni.gov.uk</u> or at the postal address listed above.

2.8 Complaints

If you have any concerns about the way this consultation process has been handled, you should send them to the following address:

Machinery of Government

Room SD03

Stormont Castle

Belfast

BT4 3TT

Email: info@executiveoffice-ni.gov.uk

Telephone: 028 9037 8055

Please note, if you choose to send your complaint in writing, you should clearly state the reason for your complaint in the 'Subject' bar of your email, or at the top of your letter.

Section 3 - Overview

This Refugee Integration Strategy sets out how the Executive will take action to support refugees and asylum seekers to ensure they are treated fairly, do not suffer injustice, can live here as valued members of our community and have every opportunity to realise their full potential.

3.1 Vision

Our **vision** is for a cohesive and shared society where refugees and asylum seekers are valued and feel safe, are integrated into communities and are supported to reach their full potential.

3.2 High Level Outcomes and associated Key Areas Actions

To achieve this vision this Refugee Integration Strategy identifies four **High Level Outcomes** and associated actions.

OUTCOME 1 REFUGEES AND ASYLUM SEEKERS ARE VALUED AND RESPECTED

Refugees and asylum seekers are respected as members of our communities and their presence, knowledge and contribution to society is recognised and valued.

Engagement and Inclusion

 Develop a framework to ensure the lived experience of refugees is taken into account and that the co-production model is embedded in policy making.

Education and Training

 Ensure involvement of refugees and asylum seekers and teachers in the design of course material and resources, informed by best practice examples internationally, for all pupils in schools to help aid integration for asylum and refugee pupils.

- Ensure the language, cultural and social needs of refugee and asylum seeker pupils
 are met and consider the need for alternatives to the existing curriculum options,
 particularly for young people who arrive here aged 14-16.
- Extend coverage of the schools of sanctuary programme.
- Provide support for employment, including ensuring ESOL is available in a timely manner for all who need it and education, training and volunteering opportunities are accessible.

Community Support

- Apply lessons learned and best practice emerging from the review of the Syrian VPRS to the delivery of mainstream services.
- Develop and support formal and informal structures that will facilitate direct engagement with refugees in policy making.
- Under T:BUC, work collaboratively with colleagues across the good relations arena to ensure good relations programmes give due consideration to the needs and input of newcomers.
- Ensure that existing vehicles such as the Community Planning Partnerships and the structures that support them are used to best effect in ensuring the needs of refugees and newcomers are met.

OUTCOME 2 – REFUGEES AND ASYLUM SEEKERS ARE SAFE AND FEEL SECURE

Refugees and asylum seekers feel welcome and live here safely without fear of persecution or discrimination resulting from their immigration status.

Housing

- Enhance engagement with the Home Office, PSNI, NIHE and other relevant agencies
 to ensure housing provided to asylum seekers by the Home Office under the Asylum
 Accommodation and Support Contract (AASC) is safe and secure.
- Build on the positive engagement with Home Office during the Covid19 pandemic to ensure effective consultation with NIHE and other agencies to support those entering the move on process.
- Build on the positive engagement between agencies to ensure a joined up and holistic approach to the provision of housing for refugees which includes taking account of the availability of other services such as schools and healthcare provision.

Destitution

- Develop a pathway out of destitution for refugees and asylum seekers facing destitution and those who have No Recourse to Public Funds (NRPF) status.
- Develop training for policy staff on the issues facing those with No Recourse to Public
 Funds Status, Right to Work Restrictions and/or Migrant Access to Benefits issues.
 - Ensure asylum seekers and refugees are identified as an at risk group in strategies, guidance and services tackling human trafficking and modern slavery.

Protecting the Most Vulnerable

Regularly review safeguarding arrangements for the most vulnerable asylum seekers
and the oversight structures developed for the Asylum Accommodation and Support
Contract (AASC) and Advice Issue Reporting and Eligibility (AIRE) operating
framework.

- Explore the potential for the development of a vulnerability assessment on arrival for Asylum Seekers to ensure appropriate support is in place for those most vulnerable such as victims of trafficking, women, children and LGBT.
- Ensure early health screening is available and easily accessible and pathways to
 accessing health services including trauma, therapeutic and specialist support
 services are clearly communicated to asylum seekers and those who work with
 them.
- Review resourcing to ensure appropriate services and expertise is in place to meet potentially increased numbers and needs of Unaccompanied Asylum Seeking Children here.

OUTCOME 3 – REFUGEES AND ASYLUM SEEKERS EXERCISE THEIR RIGHTS AND RESPONSIBILITIES

Refugees and asylum seekers are integrated into diverse and inclusive communities and are aware of, and able to exercise, their rights and responsibilities.

Pathway to Citizenship

- Ensure the provision of legal advice free of charge, in a timely manner and by appropriately trained individuals to those navigating the asylum system including recognition of the needs of particularly vulnerable groups such as UASC.
- Develop resources to outline the rights and entitlements of asylum seekers and promote awareness of cultural differences including child friendly resources.
- Work with partners across sectors to ensure appropriate advice and guidance at every stage of the journey to citizenship and in particular at transition stages where individuals are often most vulnerable.

Partnership with communities

 Work with partners across sectors to develop programmes to facilitate cultural exchange and increase cultural awareness in both newcomer and indigenous communities.

Access to services

- Ensure front line staff delivering key services receive training to recognise and respond effectively to the needs of refugees and asylum seekers.
- Develop easily accessible and culturally sensitive information to support refugees to understand and access their entitlements.

OUTCOME 4 – REFUGEES AND ASYLUM SEEKERS ARE SUPPORTED TO ACHIEVE THEIR FULL POTENTIAL

Refugees and asylum seekers have access to services and support to achieve their full potential.

ESOL

- Ensure asylum seeker needs are identified and recognised in the proposed ESOL strategy, and that the direction proposed takes into account their unique and specific needs and circumstances.
- Ensure pre-beginner levels are recognised within ESOL policy.
- Ensure appropriate resourcing for ESOL support in schools for newcomer pupils and the development of parent and child programmes to facilitate whole home learning.

Employability and Welfare

 Ensure pathways to work strategies take account of the circumstances and needs of refugees and asylum seekers.

- Maintain Executive engagement with Home Office on any future review of the right to work restrictions on asylum seekers.
- Develop support to help refugees and asylum seekers to identify equivalent qualifications or access additional or alternative training where necessary.

Effective Partnership Working

- Ensure appropriate structures are in place across departments to develop a coordinated approach to the delivery of services for refugees and asylum seekers.
- Ensure regular engagement between policy makers and organisations working with asylum seekers and refugees as well as directly with those with lived experience.

Section 4 – Impact Assessments

- 4.1 The Executive Office has conducted a rural needs impact assessment and equality screening exercise on the draft strategy.
- 4.2 This strategy's potential impacts are all intended to support equality of opportunity and access for the range of cross-cutting identities represented by the communities it is aimed at. The main aim of the strategy is to support the integration needs of asylum seekers and refugees who have arrived here and the communities in which they find themselves and is not a strategy which impacts on migration patterns or immigration policy. Immigration policy is an excepted matter and as such is exclusively set by the Home Office. This policy will have no impact on the number or scale of arrivals we experience here. As a result we have concluded that a full Equality Impact Assessment was not required.
- 4.3 These screening assessments will be revisited if necessary if there are significant changes to the strategy as a result of consultation responses.

Section 5 – Freedom of Information and Privacy Notice

Freedom of Information Act 2000 - Confidentiality of Consultations

The Department intends to publish a summary of responses following completion of the consultation process.

Your response, and all other responses to the consultation, may also be disclosed on request. The Department can only refuse to disclose information in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this public consultation.

Subject to certain limited provisos, the Freedom of Information Act gives members of the public a right of access to any information held by a public authority, in this case, the Department. This right of access to information includes information provided in response to a consultation.

The Department cannot automatically consider as confidential, information supplied to it in response to a consultation. However, it does have the responsibility to decide whether any information provided by you in response to this consultation, including information about your identity should be made public or be treated as confidential.

This means that information provided by you in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances. The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- the Department should only accept information from third parties "in confidence" if
 it is necessary to obtain that information in connection with the exercise of any of
 the Department's functions and it would not otherwise be provided;
- the Department should not agree to hold information received from third parties "in confidence" which is not confidential in nature;
- acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.

Further information about confidentiality of responses is available by contacting the Information Commissioner's Office (or at www.informationcommissioner.gov.uk).

Privacy Notice

Data Controller Name: The Executive Office

Address: The Executive Office,

E5.19, Castle Buildings,

Stormont Estate,

Belfast

BT4 3SR

Telephone: 02890 528242

Email: <u>DPO@executiveoffice-ni.gov.uk</u>

Data Protection Officer: Michael Curran

Telephone: 028 9052 0694

Email: DPO@executiveoffice-ni.gov.uk

Why are you processing my personal information?

- TEO is seeking comments from interested parties as part of its public consultation on the draft Refugee Integration Strategy. TEO is not seeking personal data as part of the consultation but is likely to receive names and addresses/e-mail addresses as part of a consultee's response.
- Consultation is a requisite part of the development of public policy and strategy.

ONLY if you are relying on consent to process personal data.

 TEO is not relying on consent for processing the data supplied by the applicant. TEO is required to seek consultation responses as part of policy development.

What categories of personal data are you processing?

 Responses to the consultation will include names and addresses and/or email addresses.

Where do you get my personal data from?

 The personal data will originate from the person responding to the consultation.

Do you share my personal data with anyone else?

o We will not share your personal data with other organisations.

Do you transfer my personal data to other countries?

o No.

How long do you keep my personal data?

 The Department will ensure that personal data is kept no longer than necessary. It manages records effectively from when they are created, including how they are stored and used, through to their destruction or archiving. The disposal of records is determined by the Department's retention and disposal of records schedule, which was approved by the NI Assembly.

(If you use automated decision making or profiling) How do you use my personal data to make decisions about me?

o TEO will not use automated processing for responses to this consultation.

What rights do I have?

You have the right to obtain confirmation that your data is being processed, and

access to your personal data

• You are entitled to have personal data <u>rectified if it is inaccurate or incomplete</u>

• You have a right to have personal data erased and to prevent processing, in specific

circumstances

• You have the right to 'block' or suppress processing of personal data, in specific

circumstances

• You have the right to data portability, in specific circumstances

• You have the right to object to the processing, in specific circumstances

• You have rights in relation to <u>automated decision making and profiling</u>

How do I complain if I am not happy?

• If you are unhappy with any aspect of this privacy notice, or how your personal

information is being processed, please contact the Department's Data Protection

Officer at the address above.

If you are still not happy, you have the right to lodge a complaint with the Information

Commissioner's Office (ICO):

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Email: casework@ico.org.uk

https://ico.org.uk/global/contact-us/

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Yes, Belfast City Council (BCC) agrees with this vision which complements the vision of the Belfast Agenda and Belfast City Council's Good Relations Strategy.

Section 6	Consultation Qu	estionnaire	
Contact name:		Belfast City Council	
Name and address o (if applicable)	f organisation		
E-mail address:		gooodrelations@belfastcity.gov.u	ık
questions. The ques	tions focus on the land actions. Howe	selecting the preferred response key elements of the strategy incl ever should you have further, add stion 49.	uding the vision,
cohesive and shared	society where ref	ion Strategy sets out the Vision a fugees and asylum seekers are v are supported to reach their full	alued and feel safe,
Q1 Do you agree	that this should k	oe the overall Vision for the Stra	tegy?
Strongly Agree Strongly Disagree	Agree	Neither Agree or Disagree	Disagree

If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or suggest what you would prefer to have as the overall vision in the box below

High Level outcomes

The draft Strategy has 4 high level outcomes.

Outcome 1 is Refugees and asylum seekers are valued and respected: Refugees and asylum seekers are respected as members of our communities and their knowledge and contribution to society is recognised and valued

On the control of the control of the control of the Control of Physics (1) the
Q2 Do you agree that this should be a key outcome for the Strategy? Please tick the box which best reflects your response
У
Strongly Agree Agree Neither Agree or Disagree Disagree
Strongly Disagree
If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or
additional commentary in the box below
Outcome 2 is Refugees and asylum seekers are safe and feel secure: Refugees and asylum
seekers feel welcome and live here safely without fear of persecution or discrimination resulting from their immigration status.
resulting from their immigration status.
Q3 Do you agree that this should be a key outcome for the Strategy? Please tick the
box which best reflects your response
у
Strongly Agree Agree Neither Agree or Disagree Disagree
Strongly Disagree Agree Neither Agree of Disagree Disagree

If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or additional commentary in the box below
Outcome 3 is Refugees and asylum seekers exercise their rights and responsibilities:
Refugees and asylum seekers are integrated into diverse and inclusive communities and are aware of and able to exercise their rights and responsibilities.
Q4 Do you agree that this should be a key outcome for the Strategy? Please tick the box which best reflects your response
У
Strongly Agree Agree Neither Agree or Disagree Disagree Strongly Disagree
If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or additional commentary in the box below
Outcome 4 is Refugees and asylum seekers are supported to achieve their full potential: Refugees and asylum seekers have access to services and support to achieve their full potential.
Q5 Do you agree that this should be a key outcome for the Strategy? Please tick the box which best reflects your response
у
Strongly Agree Agree Neither Agree or Disagree Disagree Strongly Disagree

	you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or ditional commentary in the box below
6	Is there anything else which should be considered as a key outcome?
Ye If y	you answered Yes, Please provide details in the box below
	BCC believes that further outcomes that should be considered are:
	Developing leadership that drives integration Strengthened leadership that understands the lived experience of refugees and asylum seekers and that has the capacity to drive integration in policy development and service delivery.
	Receiving Communities that are informed and supported Receiving communities that are informed and supported to respond positively to diversity.
	A Resourced and Competent Support Sector
	A support sector that is adequately and securely resourced that has the capacity to continue to provide services to refugees and asylum seekers.
	Settlement Support A commitment by the Executive to facilitate the support and settlement of asylum seekers, who arrive here spontaneously, on an equal footing with those who arrive through resettlement routes.

Priorities and Actions

Section 6 of the draft Strategy sets out the priorities and associated actions we will take to achieve the 4 high level outcomes.

OUTCOME 1

Under Outcome 1: Refugees and asylum seekers are valued and respected, the following priorities have been identified:

I. ENGAGEMENT AND INCLUSION

• Develop a framework to ensure lived experience of refugees' voices are listened to and that the co-production model is embedded in policy making.

Q7 Do you agree the outcome 1? Please tick to		and Inclusion shou est reflects your re	-	o achieve
У				
Strongly Agree	Agree	Neither Agree or I	Disagree	Disagree
Strongly Disagree				
If you have selected 'Dis additional commentary	_		se outline your re	easons or
Q8 Do you agree that	at the actions id	entified will be the	e best approach	to achieve
outcome 1? Please tick				
		У		
Strongly Agree Ag	gree Neithe	r Agree or Disagre	e Disagr	ee Strongly
Disagree				

If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or additional commentary in the box below

Belfast City Council agrees with this approach but also feels that Refugees and Asylum Seekers should have been involved in the co-production of the strategy.

The RIS commits to 'develop a framework to ensure lived experience of refugee voices are listened to and that the co-production model is embedded in policy making', while this is welcome, there is a need for acknowledgement that such work needs to be sufficiently resourced and underpinned by a fully comprehensive training programme whereby refugees and asylum seekers have the capacity to engage as equal partners and that policy makers understand fully the matters and the lived experience of asylum seekers and refugees.

The strategy should define how engagement and inclusion would work in practice and if this framework includes full departmental representation. It is also important that alongside this action there is a commitment to developing the capacity of those asylum seekers and refugees, that are not necessarily networked into organisations so that they can be engaged and included in any proposed framework.

Q9 Are there any other actions which should be considered to deliver the priority?

Belfast City Council recommends that the following actions should also be considered.

- Developing the capacity of those not networked into organisations to also have their voice heard.
- Investigate and mitigate against the barriers that will hamper the ability of those with lived experience to contribute to policy making.
- Implement a training programme to develop the expertise of policy makers to understand the lived experience of Refugee and Asylum Seekers.
- Build the capacity of leaders and policy makers to support and promote integrated communities.
- Commit to support sustainability within the sector. The community and voluntary sector provide essential services for refugee and asylum communities. It also plays an important role in providing information to policy makers. The short-term nature of funding hinders integration and the work of support organisations. Limited funding results in organisations competing against each other, which can undermine the effectiveness of the shared work. It would be helpful if the RIS commits to exploring how best the sector can be supported.
- Produce the findings of the review of the Minority Ethnic Development Fund and
 ensure that the fund is further resourced and operates on a minimum 3-year cycle.
 Several organisations have reported that they are deterred from applying to the
 Minority Ethnic Development Fund due to delays in the fund being issued and the
 need for organisations to have reserve money as they wait for delays in drawing
 down the fund, thus losing valuable staff and expertise.

II. EDUCATION AND TRAINING

- Newcomer and teachers are involved in the design of course material and resources for schools on integration to ensure the language, cultural and social needs of newcomer pupils are met
- Extend schools of sanctuary programme
- Provide support for employment including ensuring ESOL is available for all who need it and education, training and volunteering opportunities are accessible

Q10 Do you agree tha 1? Please tick the box wh		nd Training should be a priority cts your response	to achieve outcome
		У	
Strongly Agree Strongly Disagree	Agree	Neither Agree or Disagree	Disagree
If you have selected 'Disa additional commentary in		ongly Disagree', please outline yo	our reasons or
Belfast City Council believ lifelong learning opportur		on and training should be a priority	as well as access to
		identified will be the best approbes the streflects your response	oach to achieve
		У	
Strongly Agree	Agree	Neither Agree or Disagree	Disagree

Strongly Disagree

If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or

There is a need for an action to investigate the barriers that currently prohibit refugees and asylum seekers from accessing training and educational opportunities.

Education and training are a priority, however commitment needs to be provided in the strategy for life-long learning opportunities. The strategy also needs to commit to examining and addressing the barriers that are currently inhibiting adult and young refugees and asylum seekers from benefiting and accessing education and training opportunities.

We welcome the commitment in the strategy which states that it will 'Ensure the language, cultural and social needs of refugee and asylum seeker pupils are met and consider the need for alternatives to the existing curriculum options, particularly for young people who arrive here aged 14-16.'

We believe that a specific task group is required to look at the lack of structured education provision for young refugee and asylum seekers, aged 16 and above, who have limited or no English language. Many of these young people, have also experienced interruptions in their educational journey. The issue for this young group, aged 16 and above, is that they are not necessarily entitled to a school place as they are over the compulsory school age. These young people, excluded from accessing a school place, then often find themselves on waiting lists for ESOL places that are oversubscribed.

As we prepare to welcome Afghan Refugees, as well as continuing to receive people through the asylum process, this is an issue which will continue to grow in significance.

We ask that the strategy recognises that finding school places is a particular challenge currently in the Belfast City Council area and that this is an issue which requires urgent attention.

We believe that it is crucial that young asylum seekers and refugees have immediate access to study opportunities on arrival. Failure to provide such opportunities will have long-term negative effects for individuals and wider society. Specifically, without education, the young people will have very limited pathways into employment. This could lead to lifelong social security dependency with associated costs for the public purse. Further, uneducated, marginalised and excluded young people are susceptible to exploitation.

We believe also that there is a significant need for developing the capacity of teachers who are teaching young people whose first language is not English, many of whom have had significant gaps in their education as well as dealing with the impact and trauma associated with the refugee journey.

Q12 Are there any other actions which should be considered to deliver the priority? Please detail in the box below

Belfast City Council would recommend the following actions.

- Enhanced resources and skilling up of teachers to enable them to teach in a more culturally and linguistically diverse society.
- A specific task group should be set up to look at the lack of structured education
 provision for young refugee and asylum seekers, aged 16 and above, who are past
 the compulsory school age. We would suggest that a post-16 specific strand to the
 new ESOL strategy should be developed.
- Enhanced resourcing and provision of ESOL
- Targeted skills development programme for Refugees and Asylum Seekers
- Build on the models of good practices developed during covid that distributed digital
 devices to school children to ensure that asylum seeker and refugee children are not
 digitally excluded from their education and participation.
- A commitment to develop specialist interventions to help refugees overcome the barriers they can encounter when seeking employment.
- A commitment to providing tailored support to build the confidence and skills of refugees to take up employment opportunities.
- We recommend that the Dept of Education work closely with EA and schools to identify options for increasing capacity in Belfast area.
- We recommend that the DE and DfC work closely with Belfast Met and other providers to assess current ESOL provision.

III COMMUNITY SUPPORT

- Apply lessons learned and best practice emerging from the review of the VPRS to the delivery of mainstream services
- Develop and support structures which will facilitate engagement directly with refugees in policy making

 Under T:BUC, work collaboratively with colleagues across the good relations arena to ensure good relations programmes give due consideration to the needs and input of newcomers

Q13 Do you agree that Community Support should be a priority to achieve outcome 1? Please tick the box which best reflects your response
У
Strongly Agree Agree Neither Agree or Disagree Disagree
Strongly Disagree
If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or additional commentary in the box below
There is little mention of how the strategy will work with local government to promote integration at a local neighbourhood level and understand the challenges of integration at a local level.

The strategy needs to reflect the role of all communities in supporting integration and commit to working with local authorities to support localised integration and to resource community and voluntary groups, faith groups, schools etc to respond appropriately.
Q14 Do you agree that the actions identified will be the best approach to achieve
outcome 1? Please tick the box which best reflects your response
Strongly Agree Agree Neither Agree or Disagree Disagree
Strongly Disagree
If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or additional commentary in the box below
The strategy, rightly, recognises integration as being the responsibility of refugees, government and receiving communities. However, it does not contain any outcomes in relation to how we can build a better support basis within the receiving community to understand asylum patterns and to better respond to asylum trends.
The local community level is pivotal in providing the conditions for successful integration as it is in local neighbourhoods, streets, and communities where integration really happens. Although the Executive design the policy frameworks, local communities play a key role in creating conditions conducive to integration and we believe that the strategy needs to identify how it will work with local government and receiving communities to support tailored local plans and interventions to address the issues specific to places.

Q15 Are there any other actions which should be considered to deliver the priority? Please detail in the box below

Q16 Are there other higher priority areas and associated actions that should be considered to achieve outcome 1: Refugees and asylum seekers are valued and respected?

Please tick the box which best reflects your response



A commitment to review and transform current TBUC funding schemes to ensure that the definition of good relations supports the promotion of better relations between all communities.

Resourcing and support for receiving communities to enable them to welcome and support refugees and asylum seekers.

Engagement with local government to support tailored solutions to integration.

The strategy also needs to reflect how the pandemic has created serious challenges for integration and inclusion. Lockdown and social distancing measures have transformed how people connect with others. While virtual efforts, enabled family and friends to stay in touch these have been less accessible for refugees and asylum seekers who continue to be impacted by digital poverty.

The UK Government is currently proposing to introduce new legislation to reform the asylum and immigration system, which is set to have major consequences for the integration of refugees in the years ahead. The Nationality and Borders bill which is proceeding through Parliament is set to make widespread changes to current asylum rules. From the perspective of integration, one of the most significant changes in the bill is a new distinction between refugees based on their mode of arrival to the UK. The bill will give the government the scope to treat differently those who have not come to the UK 'directly' from a country or territory where their life or freedom was threatened, who have not presented themselves without delay to the UK authorities, or who have come to the UK unlawfully without good cause (Nationality and Borders Bill 2021). This will allow the Home Office to introduce a new limited protection status for this cohort if their asylum claim is successful, which only offers temporary protection and does not allow for recourse to public funds (other than in instances of destitution). The bill therefore risks undermining the integration of these refugees by inhibiting a pathway to settlement and restricting access to welfare support.

Yes	Ν	lc
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If you have selected 'yes', please detail in the box below

OUTCOME 2

Under Outcome 2: Refugees and asylum seekers are safe and feel secure, the following priorities have been identified:

I. HOUSING

- Formalise engagement with the Home Office, PSNI and NIHE to ensure housing provision is safe and secure for housing provided under the AASC and to facilitate a smooth transition in the move on process
- Develop a clear and accessible support pathway/resource for refugees and those who support them on access to housing

who suppo	ort them on access t	o housing	
-	ree that Housing short t reflects your respo	ould be a priority to achieve out	come 2? Please tick
У			
Strongly Agree Strongly Disagree	Agree	Neither Agree or Disagree	Disagree
-	entary in the box bel	ongly Disagree', please outline yo	ui reasons oi
		identified will be the best approbest reflects your response	each to achieve
		х	
Strongly Agree	Agree	Neither Agree or Disagree	Disagree
Strongly Disagree			

If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or additional commentary in the box below

We agree with this outcome and believe that safe and secure housing solutions are an essential aspect of integration. We believe that the issue of asylum and refugee integration needs to be included in future housing policy and homelessness strategies.
Enhanced and sensitive communication is needed for receiving communities to dispel misunderstandings in relation to asylum and refugee matters.

Q19 Are there any other actions which should be considered to deliver the priority? Please detail in the box below

We believe that the strategy does not reflect the current reality and the significant increase in asylum seekers arriving in Belfast. This includes the shortage of housing stock and the pressures on public services as well as the community and voluntary groups supporting asylum seekers and refugees. The strategy needs to recognise the challenges that the increased use of contingent asylum accommodation, such as hotels, brings to integration and inclusion.

II. DESTITUTION

- Develop a pathway for supporting refugees and asylum seekers facing destitution and those who have NRPF status
- Ensure asylum seekers and refugees are identified as an at risk group in strategies tackling human trafficking and modern slavery.

tick the box which be		should be a priority to achieve of esponse	outcome 2? Please
У			
Strongly Agree	Agree	Neither Agree or Disagree	Disagree
Strongly Disagree			
If you have selected additional comment	=	ongly Disagree', please outline yo ow	our reasons or
Q21 Do you agree	that the actions	identified will be the best appro	oach to achieve
		best reflects your response	
		У	
Strongly Agree	Agree	Neither Agree or Disagree	Disagree
Strongly Disagree			
-	_	ongly Disagree', please outline yo	our reasons or
additional comment	ary in the box belo	OW	
		nits to developing pathways out or rovided in terms of what this wo	
practical level.	ould have been p	rovided in terms of what this wo	uid look like oli a

Q22 Are there any other actions which should be considered to deliver the priority?

	ld recommend an integrated approach across all Government Departments to the impact of destitution and the No Recourse to Public Funds condition.
Please det	tail in the box below
III. PR	OTECTING THE MOST VULNERABLE
	feguarding of the most vulnerable asylum seekers is regularly reviewed and ersight structures developed for the AASC and AIRE operating framework
he	rly health screening is available and easily accessible and pathways to accessing alth services are clearly communicated to asylum seekers and those who work th them
	view of resourcing of support for Unaccompanied Asylum Seeking Children to sure support is sufficient to adequately meet increasing needs in this area
	you agree that Protecting the Most Vulnerable should be a priority to achieve 2? Please tick the box which best reflects your response
У	
Strongly A Strongly D	
	e selected 'Disagree' or 'Strongly Disagree', please outline your reasons or I commentary in the box below

Q24 Do you agree that the actions identified will be the best approach to achieve
outcome 2? Please tick the box which best reflects your response y
Strongly Agree Agree Neither Agree or Disagree Strongly Disagree If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or additional commentary in the box below
Racism and discrimination are key features of the refugee and asylum experience in NI. This needs to be reflected in the strategy as well as a commitment to working with the DOJ to provide long-term interventions.
Q25 Are there any other actions that should be considered to deliver the priority? Please tick the box which best reflects your response Yes No If you have selected 'yes', please detail in the box below
Understanding the inequalities and discrimination encountered by Refugees and Asylum Seekers and the impact that this has on the integration process and their future life chances.
Q26 Are there other higher priority areas and associated actions that should be considered to achieve outcome 2: Refugees and asylum seekers are safe and feel secure? Please tick the box which best reflects your response
у

Yes	No

If you have selected 'yes', please detail in the box below

Develop a framework for ethnic monitoring to understand the inequalities and discrimination encountered by Refugees and Asylum Seekers and the impact that this has on the integration process and their future life chances.

OUTCOME 3

Q27

Under Outcome3: Refugees and asylum seekers exercise their rights and responsibilities, the following Priority Areas have been identified:

PATHWAY TO CITIZENSHIP I.

- Ensure the provision of legal advice free of charge, in a timely manner and by appropriately trained individuals to those navigating the asylum system
- Develop resources to outline rights and entitlements for asylum seekers to signpost to services and support and facilitate awareness of cultural differences
- Work with partners across sectors to ensure appropriate advice and guidance at every stage of the journey to citizenship and in particular at transition stages where individuals are often most vulnerable

Q27 Do you agr	ee that Pathway to	Citizenship should be a priority	to achieve outcome
3? Please tick the k	oox which best refle	ects your response	
У			
Strongly Agree Strongly Disagree	Agree	Neither Agree or Disagree	Disagree

-	ted 'Disagree' or 'Stro entary in the box bel	ongly Disagree', please outl	ine your reasons or
- ·	_	identified will be the best best reflects your response	
Dutcome 5: Flea	Se tick the box which	у	
Strongly Agree Strongly Disagre	Agree e	Neither Agree or Disagro	ee Disagree
	ted 'Disagree' or 'Stro entary in the box bel	ongly Disagree', please outl ow	ine your reasons or
Enhanced suppo	rt and provision of qua	lified immigration practitione	rs.
	-	at should be considered to	o deliver the priority?
Please tick the bo	ox which best reflects	your response	
Yes	No		

If you have selected 'yes', please detail in the box below A commitment to resourcing and growing the immigration advice sector A commitment to build the knowledge and capacity of the advice sector to respond to the needs of refugees and asylum seekers as well as developing specialist interventions where necessary. II. **Partnership with Communities** Work with partners across sectors to develop programmes to facilitate cultural exchange and increase awareness in both newcomer and indigenous communities Q30 Do you agree that Partnership with Communities should be a priority to achieve **outcome 3?** Please tick the box which best reflects your response У **Strongly Agree Neither Agree or Disagree** Agree Disagree **Strongly Disagree** If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or additional commentary in the box below Do you agree that the actions identified will be the best approach to achieve outcome 3? Please tick the box which best reflects your response

Strongly Agree Agree Neither Agree or Disagree Disagree Strongly Disagree

If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or additional commentary in the box below

We agree that partnership with Communities is critical to the promotion of integration and we would also welcome enhanced partnership working with local government.

Q32 Are there any other actions that should be considered to deliver the priority?

Please tick the box which best reflects your response





Yes

If you have selected 'yes', please detail in the box below

- Provision and resourcing of a structured orientation programme for Refugees and Asylum Seekers.
- Develop opportunities that will support receiving communities to understand matters relating to changes in their community and how they can welcome Asylum Seekers and Refugees.
- Enhanced partnership working between TEO and local government to support localised integration.

III. ACCESS TO SERVICES

- Ensure front line staff receive training to adequately recognise and respond to the needs of refugees and asylum seekers
- Development of easily accessible information to support refugees to understand and access their entitlements

Q33 Do you agree that Ac		-	oriority to achiev	e outcome 3?
Please tick the box which bes	t reflects yo	our response		
У	JL			
Strongly Agree Strongly Disagree	Agree	Neither Agree or I	Disagree	Disagree
If you have selected 'Disagre additional commentary in the	_		se outline your re	easons or
Q34 Do you agree that the outcome 3? Please tick the b				to achieve
] [х		
Strongly Agree Strongly Disagree	Agree	Neither Agree or I	Disagree	Disagree
If you have selected 'Disagre additional commentary in the	_		se outline your re	easons or
Ensure that policy makers / de experience of Refugees and A diverse communities when de	sylum seekei	rs and are competer	-	
Q35 Are there any other a			ered to deliver th	ne priority?
Please tick the box which bes	Treflects yo	our response		

Yes

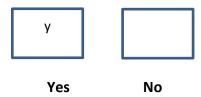
No

If you have selected 'yes', please detail in the box

Develop a training programme to build the capacity of policy makers / departments to understand
the lived experience of Refugees and Asylum seekers and how policy impacts these communities.

Q36 Are there other higher priority areas and associated actions that should be considered to achieve outcome 3: Refugees and asylum seekers exercise their rights and responsibilities?

Please tick the box which best reflects your response



Structured orientation programme that is available to all Refugees and Asylum Seekers

Investment in ESOL classes

Capacity Building / cultural competence training within the advice sector

Resourcing of Immigration Advisors.

OUTCOME 4

Under Outcome 4: Refugees and asylum seekers are supported to achieve their full potential, the following Priority Areas have been identified:

- I. ENGLISH AS A SECOND OR OTHER LANGAUGE (ESOL)
 - Ensure asylum seekers are identified as a key area of need in the proposed ESOL strategy to take account of their unique and specific needs and circumstances
 - Ensure pre-beginner levels are recognised within the ESOL framework

Q37 Do you agree that ESOL should be a priority to achieve outcome 4? Please tick the box which best reflects your response

Y

Strongly Agree Agree Neither Agree or Disagree Disagree
Strongly Disagree

If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or additional commentary in the box below

Q38 Do you agree that the actions identified will be the best approach to achieve outcome 4? Please tick the box which best reflects your response

Neither Agree or Disagree

Agree

Strongly Agree

Strongly Disagree

Ensure appropriate resourcing for ESOL support in schools for newcomer pupils and the development of parent and child programmes to facilitate whole home learning.

Disagree

If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or additional commentary in the box below

The current provision of ESOL is not meeting demand. Further investment in provision is required by the Department.
Acquiring English is key to unlocking other avenues of integration. The RIS needs to review the current provision and ensure that early access to ESOL is available to those Refugees and Asylum Seekers who require it.
Q39 Are there any other actions that should be considered to deliver the priority? Please tick the box which best reflects your response y Yes No
Further investment in provision of ESOL classes Review the fees for other further education / vocational and academic courses that deter refugees and asylum seekers from accessing educational opportunities and furthering their life opportunities.

II. EMPLOYABILITY AND WELFARE

• Pathways to work strategies take account of the circumstances and needs of asylum seekers and refugees

- The Executive continues to engage with Home Office to urge a review of the right to work restrictions on asylum seekers
- Support is developed to help refugees and asylum seekers to identify equivalent qualifications or access additional or alternative training where necessary.

Q40 Do you agree that Emoutcome 4? Please tick the b		Velfare should be a prior lects your response	ity to achieve
У			
Strongly Agree Strongly Disagree	Agree Neith	er Agree or Disagree	Disagree
If you have selected 'Disagree additional commentary in the		agree', please outline you	ır reasons or
Q41 Do you agree that the	 e actions identific	ed will be the best approa	ach to achieve
outcome 4? Please tick the b			
	х		
Strongly Agree	Agree Neith	er Agree or Disagree	Disagree
Strongly Disagree			

If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or additional commentary in the box below

Belfast City Council would recommend the need for targeted programmes to address the loss of confidence, matters around trauma and the gaps that many Refugees have in their employment history that deters them from entering the labour market.

Q42 Are there any other actions that should be considered to deliver the priority?

Please tick the box which best reflects your response

If you have selected 'yes', please detail in the box

- Address loss of skills and confidence due to the asylum journey and the restrictions placed on asylum seekers and their access to the labour market.
- Investigate the impact of trauma and how that is preventing many from accessing the labour market.
- Investigate the extent of racial discrimination within workplaces and within recruitment practices.
- Difficulties with transferring qualifications.
- Targeted programmes to create pathways into professions.

III. EFFECTIVE PARTNERSHIP WOKRING

- Ensure appropriate structures are in place across departments to develop a coordinated approach to the delivery of services for refugees and asylum seekers
- Policy makers engage regularly with both organisations working with asylum seekers and refugees as well as directly with those with lived experience

Q43 Do you agree that Effective Partnership Working should be a priority to achieve outcome 4? Please tick the box which best reflects your response

У				
Strongly Agree Strongly Disagree	Agree	Neither Agree or D)isagree	Disagree
If you have selected 'Disa additional commentary in	_		e outline your r	reasons or
Q44 Do you agree tha outcome 4? Please tick t		identified will be the		n to achieve
		х		
Strongly Agree Strongly Disagree	Agree	Neither Agree or D)isagree	Disagree
If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or additional commentary in the box below				
Belfast City Council agree that policy makers engage regularly with both organisations working with asylum seekers and refugees as well as directly with those with lived experience. However we believe for this engagement to work, it needs to be underpinned by a training programme to enable refugees and asylum seekers understand how decisions are made and how to effect change.				

Please tick the box which best reflects your response
У
Yes No
If you have selected 'yes', please detail in the box
 Ensure that any engagement structure is sufficiently resourced and underpinned by a training programme for participants and that it is representative of asylum seekers and refugees not necessarily networked into organisations. Develop links with local government to support targeted programmes to improve employability pathways.
Q46 Are there other higher priority areas and associated actions that should be
considered to achieve outcome 4: Refugees and asylum seekers are supported to achieve their full potential?
Please tick the box which best reflects your response
У
Yes No
If you have selected 'yes', please detail in the box below
All asylum seekers arriving in NI receive the same level of support as those that arrive through the resettlement programme.

Monitoring and Evaluation

Q45 Are there any other actions that should be considered to deliver the priority?

The Strategy does not make it clear as to which department is the designated lead.

The absence of robust and coherent data and the limitations of ethnic monitoring will make it difficult to monitor the impact of the strategy. The Executive needs to commit to developing guidance on ethnic monitoring.

Section 7 of the draft Strategy sets out how we intend to monitor and evaluate the Strategy. It proposes that implementation will be monitored by the Strategic Planning Group through regular updates from departments and an annual report on progress.

Q47 Do you agree with the approach to monitoring progress thorough the Strategic Planning Group? Please tick the box which best reflects your response				
		х		
Strongly Agree Strongly Disagree	Agree	Neither Agree or Disagree	Disagree	
If you have selected 'Disag	ree' or 'Stro	ongly Disagree', please outline y	our reasons or	

If you have selected 'Disagree' or 'Strongly Disagree', please outline your reasons or additional commentary in the box below

The monitoring arrangements should be made clearer. For example, when will the Monitoring and Evaluation plan be published? How will departments consult with those with lived experience?

The RIS recognises the scarcity of routinely collected administrative data. This acknowledgement needs to be translated into a commitment to improve and expand the availability of data and provide direction for future ethnic monitoring.

Q48 Do you agree with the approach to consider research taking into account the experiences of refugees and asylum seekers here to provide a wider and more informed

picture on the effe	ectiveness of the st	rategy? Please tic	k the box which b	pest reflects your
response				
		х		
Strongly Agree	Agree	Neither Agree	or Disagree	Disagree
Strongly Disagree				
If you have selecte	ed 'Disagree' or 'Stro	ongly Disagree', p	lease outline you	r reasons or
additional comme	ntary in the box belo	ow		
research that has be starting point. In a experience of peop would also recomm from the NI Affairs	ddition, Belfast City Cople from BAME commend that the Execution Committee investigatere is a need to improper	ate, we would record council has commission nunities in Belfast, to live office also reviention.	mmend that the Exsioned research, lo his is due to comp w any findings / re	xecutive review this as a
OTHER COMMENT				
Q49 Do you hav	e any other commo	ents to inform the	e final strategy?	
Please tick the box	which best reflects	your response		
У				

If you have selected 'yes', please detail in the box below

No

Yes

Belfast City Council notes that the strategy does not reflect the full range of actions that will be taken to progress the outcomes and that further work to fully implement the

strategy will be taken forward by departments across the lifetime of the Strategy, however we have noted some key areas for action below:

The strategy must reflect the current reality and the significant increase in asylum seekers arriving in Belfast including the shortage of housing and the increased pressure of finding school places and of ensuring access to health and other services.

The strategy needs to recognise also the challenges to integration that the increased use of contingent asylum accommodation, such as hotels brings. It also needs to plan for the capacity of services to respond appropriately.

The strategy also needs to reflect how the pandemic has created serious challenges for integration and inclusion. Lockdown and social distancing measures have transformed how people connect with others. While virtual efforts, enabled family and friends to stay in touch these have been less accessible for refugees and asylum seekers who continue to be impacted by digital poverty.

In addition, the strategy also needs to reflect the concerns articulated by the Refugee and Asylum Forum in relation to the proposed Nationality and Borders Bill. The UK Government is currently proposing to introduce new legislation to reform the asylum and immigration system, which is set to have major consequences for the integration of refugees in the years ahead. The nationality and borders bill which is proceeding through Parliament is set to make widespread changes to current asylum rules. From the perspective of integration, one of the most significant changes in the bill is a new distinction between refugees based on their mode of arrival to the UK. The bill will give the government the scope to treat differently those who have not come to the UK 'directly' from a country or territory where their life or freedom was threatened, who have not presented themselves without delay to the UK authorities, or who have come to the UK unlawfully without good cause (Nationality and Borders Bill 2021). This will allow the Home Office to introduce a new limited protection status for this cohort if their asylum claim is successful, which only offers temporary protection and does not allow for recourse to public funds (other than in instances of destitution). The bill therefore risks undermining the integration of these refugees by inhibiting a pathway to settlement and restricting access to welfare support.

Integration as a shared responsibility

The strategy rightly recognises integration as being the responsibility of refugees, government and receiving communities. However, it fails to outline any outcomes in relation to building a better support basis within receiving communities to understand asylum patterns and to better respond to asylum trends and the arrival of new neighbours.

Experience shows that real integration doesn't happen in action plans; it happens in neighbourhoods and communities. The varied nature and scale of challenges with integration means that tailored local plans and interventions are needed to address the issues specific to particular places. BCC would welcome enhanced working relations with TEO to support effective integration and to improve understanding of how integration is experienced in neighbourhoods across Belfast.

We believe that a further outcome of the strategy should focus on receiving communities and supporting them to respond positively to diversity.

Learning from Lived Experience

BCC welcomes the commitment in the strategy to develop a framework to ensure the lived experience of refugees' voices are listened to and that the co-production model is embedded in policy making. We believe that any engagement structure needs to be sufficiently resourced and underpinned by a training programme for participants. Such a structure must also be representative of asylum seekers and refugees not networked into organisations.

Leadership and expertise that can drive integration

We believe that there is a need for strengthened leadership that understands the lived experience of refugees and asylum seekers and that has the capacity to drive integration in policy development and service delivery.

We believe that there is a need for policy makers across all sectors to understand better the lived experience of Refugee and Asylum Seekers.

A resourced and competent support sector

We would recommend a commitment and action around supporting the capacity of the community and voluntary sector to continue to provide high quality advice and services to refugees and asylum seekers, as well as for policy makers. This includes funding of the community and voluntary sector, significant investment in immigration practitioners as well as targeted training for the advice sector.

Settlement support

We would recommend a commitment by the Executive to facilitate the support and settlement of asylum seekers, who arrive here spontaneously, on an equal footing with those who arrive through the resettlement route. We believe also that the Executive should consult with the Home Office about exploring accommodation outside of Belfast for asylum seekers, as the current provision in hotels is not conducive to promoting integration and inclusion. It is also putting a significant demand on services and the support that can be offered to asylum seekers.

Tailored support and opportunities for people to reach their full potential

Being in secure work and progression in work is key to supporting integration. Refugees should have the opportunity to upskill and reskill into the jobs of the future. There needs to be tailored support and opportunities for asylum seekers and refugees to reach their full potential.

A comprehensive orientation programme.

The RIS strategy commits to 'work with partners across sectors to develop programmes to facilitate cultural exchange and increase cultural awareness in both newcomer and indigenous communities'. We welcome this but recommend a commitment to invest in acomprehensive and coordinated orientation programme for new arrivals. Cultural orientation accelerates the process of achieving self-sufficiency and participation in community life.

Trauma support services

Poor psychological wellbeing through traumatic experiences can hinder the integration process as can poor physical health arising from persecution and the asylum journey. It is critical that models of trauma support are available to enable refugees and asylum seekers to reach their full potential.

Racism, inequalities and discrimination

Racism and discrimination are key features of the refugee and asylum experience in NI. This needs to be spelt out in the strategy and clarity provided as to how the strategy will complement work undertaken by DOJ to address hate issues.

Family Re-Unification

The strategy would also need commit to working with the home office on matters relating family reunification, this is one of the first priorities for asylum seekers and refugees that arrive here. Unification of families is critical to the integration process.

Data and understanding ethnic inequalities

The RIS recognises the scarcity of routinely collected administrative data. This acknowledgement needs to be translated into a commitment to improve and expand the availability data and to advise local government in this area. Without adequate data it is impossible to understand the dept and impact of ethnic inequalities.

Monitoring arrangements

The monitoring arrangements should be made clearer. For example, when will the Monitoring and Evaluation plan be published? What indicators will be used to monitor integration and the outcomes within the strategy? How will Departments consult with those with lived experience?

Lastly, which Minister will have overall responsibility for the strategy?