



Response to the Executive Office's 'Racial Equality Call for Views'

6 March 2025

The Executive Office published a Racial Equality [Call for Views](#) on 6 February 2025, "to support the development of the new strategic approach to racial equality".

Below please find PPR's submission, highlighting key areas of concern.

Question 1. What do you perceive to be the root cause of racism and racial inequalities here?

Context: the impact of 'hostile environment' immigration policies on immigration rights

The UK has seen decades of deliberately hostile policies towards people seeking international protection and other newcomers¹. These have been constructed and enacted by a succession of both Labour and Tory governments; Theresa May's 'hostile environment'² is perhaps the best known of these programmes, though it is not the last³. The cumulative impact of these policies have forced people seeking safety in the UK to live in impoverished, dependent and isolated circumstances.

Immigration falls squarely under the remit of the Home Office in Westminster; but the uptick in immigration here over recent years -- as of end September 2024 there were 2,632 people in NI in receipt of some form of asylum support from the Home Office⁴ -- has meant that NI departments

¹ To give just a partial overview: the 1996 and 1999 **Immigration and Asylum Acts** restricted access to benefits and support amongst people subject to immigration control and imposed a 'No Recourse to Public Funds' status on some, including asylum seekers whose initial application was refused. Such measures continued. In 2002, the **Nationality, Immigration and Asylum Act** extended the previous six-month wait for permission to work imposed on people in the asylum system to one year and restricted their access to social care. The 2006 **Immigration, Asylum and Nationality Act** provided for prosecution of employers who flouted the work ban. In 2010 the Home Office imposed further restrictions on the right to work, limiting asylum seekers' employment options after 12 months in the system solely to positions on its bespoke, highly specialised 'Shortage Occupation List'. Self-employment, and employment in any position not among the handful of professions listed, was not permitted.

² In 2012 then-Prime Minister Theresa May publicly announced the government's intent to create a 'hostile environment' in the UK-- ostensibly for 'illegal immigrants', but in fact also for people in the asylum system and other immigrants. Via **Immigration Acts** in 2014 and 2016 the government stiffened penalties for and imposed new requirements for internal checks by private employers and landlords potentially in contact with immigrants.

³ Tory governments of more recent years continued the trend. In 2020, changes to the **Immigration Rules** mandated deportation of rough sleepers, even those with leave to remain. The 2022 **Nationality and Borders Act** established different pathways and entitlements to asylum seekers arriving 'directly' to the UK (ie by non-stop flight) as opposed to those having crossed other countries' borders during their journeys. The UK government signed a Memorandum of Understanding with the government of Rwanda for off-shore processing of asylum claims -- and off-shore fulfilment of protection duties in the event of successful claims -- which ultimately was not implemented following legal challenges.

⁴ <https://www.gov.uk/government/statistical-data-sets/immigration-system-statistics-data-tables#asylum-and-resettlement>, (table ASY_D09)

and agencies are increasingly confronted with the impact of Westminster's 'deterrent' policies on vulnerable households in need of their services locally. The ways in which Home Office policies interact with NI's existing economic, societal, administrative and structural constraints inform many aspects of this submission.

2. What in your view are the key inequalities faced by minority ethnic people?

The rights impact of the rising incidence of racist hate crime in NI

In recent years PPR have monitored and recorded reports of hate incidents in NI, whether sectarian or race- or ethnicity-oriented⁵. However, press accounts represent only some of what is reported to the police, and what is reported to the police represents only a fraction of what happens day to day. (This is particularly true in NI in light of information that came to light in February 2023 of the Police Service of Northern Ireland reporting dozens of foreign-born victims of crime – people who had approached them for help -- to Home Office Immigration Enforcement authorities⁶. These included victims of human trafficking, modern slavery and domestic violence.)

Aware of this community's understandable distrust and fear of the authorities, in summer and autumn 2023 PPR supported several individuals whose South Belfast businesses had been targeted in racially-motivated hate crimes, through intimidation, threats and arson attacks⁷.

PPR and affected business owners convened a public meeting on 31st August 2023, to which all political parties, relevant public bodies, community organisations and Departmental representatives were invited. No one has been brought to justice, and victims' applications to the Criminal Damage Compensation Scheme were denied⁸. (In response, in July 2024 the Victims of Crime Commissioner publicly stated that the scheme was not fit for purpose⁹.)

However, racially-motivated incidents continued; some politicians deflected criticism of such behaviour by referring to local people's discomfort with change or describing it as a reaction to perceived loss of public services¹⁰. In the year leading up to March 2024, the Police Service of Northern Ireland recorded around 1,350 racially motivated incidents and 840 such crimes – the highest levels since data began being collected in 2004/5¹¹. It was clear from the data that the incidence of these had increased in Belfast over the year preceding the summer 2023 attacks. Sanction rates in the city – at 11% -- were substantially lower than the average in England, Scotland and Wales (16%).

PPR's Freedom of Information requests revealed the inadequacy of the data-sharing on the frequency and location of hate incidents, necessary in order to map threats and to bring perpetrators to justice. Longstanding arrangements between, for instance, housing authorities and entities tasked with 'verifying' reported threats from paramilitary groups came under heightened scrutiny¹².

⁵ See <https://www.nlb.ie/investigations/policy-watch/07-2024-racism-in-belfast-a-timeline-and-media-resource>

⁶ <https://thedetail.tv/articles/migrants-risk-deportation-after-reporting-crimes-to-psni>

⁷ See <https://www.nlb.ie/blog/2024-07-racism-in-belfast-local-shops-and-businesses-only>. At least one perpetrator's face was caught on CCTV footage that was provided to the police.

⁸ 75% of the claims decided over the last five years of recorded data, which saw 1,000 claims made, were denied.

⁹ <https://www.thedetail.tv/articles/victims-of-race-hate-attacks-refused-government-compensation>

¹⁰ <https://www.belfastlive.co.uk/news/belfast-news/dup-councillor-says-offensive-signs-28035373>

¹¹ <https://www.psni.police.uk/about-us/our-publications-and-reports/official-statistics/hate-motivation-statistics>

¹² See for instance <https://www.nlb.ie/blog/2024-08-racism-in-belfast-what-do-we-know-and-how-are-we-using-it-to-combat-racist-violence>

3 August 2024 saw a night of targeted attacks¹³. Seven Black-owned businesses on Sandy Row, Donegall Road, and Botanic (all in South Belfast) were attacked by rioters following a Far-Right march in central and South Belfast at which known paramilitaries were also present. The PSNI did little to contain the violence or stop the attacks from taking place, raising further questions about the way such events are policed. Homes, businesses and places of worship continued to be targeted throughout the week.

The official response

The PSNI itself called the violence ‘organised’¹⁴, and some civil society groups linked it with elements of loyalist paramilitarism¹⁵. The Committee for the Elimination of Racial Discrimination made the same connection in its 2024 Concluding Observations:

while noting the efforts by the State party to tackle paramilitarism in Northern Ireland, the Committee is concerned about reports of paramilitary groups and affiliated individuals perpetrating acts of racist violence and intimidation to deter persons belonging to ethnic minorities and migrants from taking up housing or establish business in certain areas. It is also concerned about information indicating that victims do not always report these acts for fear of reprisals and that the response by the authorities and the police has been ineffective¹⁶.

It recommended

that the State party, particularly the government of Northern Ireland, adopt robust measures to prevent and combat paramilitary racist violence and intimidation against ethnic minorities and migrants in Northern Ireland, systematically collect information on these acts of intimidation and ensure that cases of paramilitary racist violence and intimidation are promptly and effectively investigated, prosecuted and punished with appropriate sanctions, and that victims have access to effective protection and redress.¹⁷

Individuals and families around Belfast and around the north were left fearful and isolated. In some cases, official responses in the aftermath of the violence reportedly compounded the trauma that people had just experienced. (In one example, Black and Minority Ethnic communities alerted NI Assembly members that victims of race hate crime had been referred to restorative justice organisations known to have links to paramilitary and proscribed organisations¹⁸. The continuing use of such programmes by public authorities – and the practice of referring survivors to them - is being called into question in this context.)

More broadly, earlier in the summer of 2024, the NI Housing Executive had opened a consultation on a ‘Community Safety Strategy’. It was focused primarily on anti-social behaviour. This, in the light of the violence to come, inadvertently shone a spotlight on too many duty bearers’ tendency to minimise the recurring threats and incidents facing ethnic and religious minorities, and

¹³ See *inter alia* <https://www.bbc.co.uk/news/articles/cgkyyjg3pxpo>

¹⁴ <https://www.bbc.co.uk/news/uk-northern-ireland-67126304>

¹⁵ <https://www.bbc.co.uk/news/articles/c8erk5zz894o>

¹⁶ CERD/C/GBR/CO/24-26, para. 21.

¹⁷ *Ibid.*, para. 22.

¹⁸ <https://www.irishnews.com/news/northern-ireland/psni-watched-on-and-let-rioters-burn-businesses-mlas-told-NTYG4A2E5ZGO5HQ3TZJR7DST4Y/>

underlined the urgent need for a more serious approach to tackling racism and hate crime -- including by paramilitary groups and those under their protection¹⁹.

The Department of Justice, the PSNI and the Housing Executive participate in a Hate Incident Practical Action Scheme to support people whose homes have been targeted by hate crime, but Freedom of Information (FOI) requests reveal that its implementation is very limited (8 applications received and acted on in 2022/23 and 2023/24; 6 as of mid-way through financial year 2024/25). A new (2022) Hate Crime Advocacy Service to encourage reporting and follow-up of incidents saw, in 2022/23, 7% of reported cases forwarded to the Public Prosecution Service for consideration; in 2023/24 this was 3.4%, according to FOI response. A multilingual 'HelpInHand' app was introduced in 2024 with information about how to report incidents and next steps; its impact has yet to be assessed.

For their part, elected members of the Northern Ireland Assembly took part in an open debate on paramilitarism, its role in communities and the practice of official engagement with its representatives on 15 October 2024. Reflecting growing public concern²⁰, the debate questioned whether engagement with individuals linked to paramilitary groups served to legitimise the groups, and the extent to which that is – or isn't – in the public interest:

talking to representatives of armed groups to bring about peace as people were dying is not the same as talking to representatives of armed groups engaged in widespread criminality 30 years on who have no apparent intention of getting off the stage and getting off the backs of communities²¹.

Another MLA commented, "in too many places, we now have a situation where people are community workers by day and thugs by night". A third expressed an opposing view, that a "credible path to ending paramilitarism once and for all" depends on engagement with "those who wish to move out from under the shadow of paramilitarism for good"²². They agreed a joint resolution²³. Another resolution, of 12 November, called for

¹⁹ See PPR's consultation response at <https://www.library.nlb.ie/book/87>.

²⁰ Public concern about the role and influence of paramilitaries was heightened by information that two sitting Ministers for the DUP party – the Communities and Education Ministers – had recently met with members of the Loyalist Communities Council. This group is reported to include representatives of loyalist paramilitary organisations; it was recently described by the BBC as "a legal entity which represents illegal organisations" (see <https://www.bbc.co.uk/news/articles/cq5enw0zjp9o>). These concerns were further compounded by the fact that law-abiding civil society groups who wished to engage with DUP Ministers on matters of policy were denied the opportunity to meet.

²¹ The record is at <https://data.niassembly.gov.uk/HansardXml/plenary-15-10-2024.pdf>.

²² *Ibid.*

²³ *Ibid.* "That this Assembly recognises that the ongoing presence of paramilitary organisations is harming community cohesion, economic development and the overall stability of Northern Ireland; notes with concern the persistent incidents of paramilitary activity, including intimidation, extortion and violence, which continue to undermine the rule of law and the safety of our citizens; further notes with regret the continued attempts by groups linked to paramilitary organisations to influence policy decisions in the absence of a democratic mandate or transparent governance structures; and calls on the First Minister and deputy First Minister to introduce a comprehensive review of the tackling paramilitarism, criminality and organised crime programme to ensure that actions within the final Programme for Government genuinely tackle the scourge of paramilitarism in our society."

a comprehensive review of the racist attacks of July and August 2024, to include what happened, why it happened and who was involved, and to bring forward proposals on how to prevent it happening again²⁴.

An independent review of NI's Racial Equality Strategy 2015-2025 – submitted in March 2024 but not made public by the NI Executive until the eve of the Christmas holidays, 23 December 2024 – found that

the aims of the strategy have been undermined by the lack of: an action plan; involvement of people with lived experience; and a process for ethnic monitoring; and could have been enhanced by more attention to governance²⁵.

The review proposed concrete actions in each of these four areas, including amongst others development of an action plan and budget, a regular review process for the strategy and a programme for engagement with marginalised groups.

Access to specific rights amongst people seeking international protection

Social security access

People in the asylum system are not eligible for state support like benefits or social housing²⁶. If their asylum claim is rejected, they lose even the minimal asylum support and are unable to access any public funding. This is known as 'No Recourse to Public Funds' status and can lead to total destitution²⁷. Denied access to state-sponsored emergency accommodation, they are at risk of becoming street homeless and worse still, at risk of exploitation, trafficking and for women, sexual and gender-based violence without recourse to justice.

When people receive a positive decision on their claim for asylum, they become eligible to work and for the UK's Universal Credit benefit system. However, the five-week wait for the first Universal Credit payment – a feature built into the UC system and affecting all applicants – causes a continuing period of enforced destitution, a gap between when one form of support ends and another begins. What this means practically is that people – including children – suffer hardship and distress. This is compounded by the fact that new refugees placed by the Housing Executive in emergency accommodation in hotels – unlike in asylum accommodation -- do not have either access to kitchens or set meals provided. Families have told PPR of living on donations of bread and butter with their children while waiting for their Universal Credit payment to come through.

Protection of the family and children

Our work with families seeking international protection and newly-recognised refugees indicates that they would greatly benefit from provision of a social care assessment upon their arrival in NI. Many families we have worked with include disabled adults or adults with long term health

²⁴ See record at <http://data.niassembly.gov.uk/HansardXml/plenary-12-11-2024.pdf>

²⁵ Independent Review of the progress on the implementation of the Racial Equality Strategy 2015-25: final report at <https://www.executiveoffice-ni.gov.uk/sites/default/files/2024-12/independent-review-of-the-progress-on-the-implementation-of-the-racial.PDF>, p. 2

²⁶ <https://www.gov.uk/government/publications/public-funds--2/public-funds>

²⁷ <https://www.nrpfnetwork.org.uk/information-and-resources/rights-and-entitlements/immigration-status-and-entitlements/who-has-no-recourse-to-public-funds#guide-content>

conditions that need specific support to manage them, as well as physically disabled children and those of require additional support because of a learning disability, autism or other neurodiverse experiences. Despite this, we have on multiple occasions observed that Mears, the UK Home Office accommodation provider has failed to assess and provide for the needs of disabled people; examples are families with non-mobile children housed on upper floors, families with multiple wheelchair users confined to one room, inaccessible bathing and toileting facilities and individuals with heart problems housed on upper floors without lift access. To compound this, waiting lists for occupational therapy assessments are long, and families can often be left waiting several months before their needs are appropriately identified.

Families in and those newly emerging from the asylum system are subjected to very frequent moves. For too many families with particular needs – family members living with disabilities or chronic health problems, for instance – this means that they have to fight the same battles for suitable and accessible accommodation over and over again.

A mechanism for regular social care assessment would ensure that accommodation and other providers are fully informed of a family's situation and can take that into account in decision-making about their accommodation, without forcing them to begin the process from scratch each and every time they are moved. It would also ensure that people living with disabilities or health conditions would not risk falling through the cracks in the system, but instead have their needs fully taken into account by all duty bearers.

Poverty and an adequate standard of living

While in the asylum system, new arrivals to NI are frequently housed in hotels under the aegis of the Home Office's Asylum Accommodation Support Contract held by the private company Mears Group. Our January 2023 submission to the UN Committee on Economic Social and Cultural Rights described some of our work with asylum seekers placed in restrictive and isolating 'contingency accommodation' in hotels, and the ways in which we helped them raise their concerns with duty bearers (a follow up meeting on 22 February 2023 highlighted some progress in some areas)²⁸.

The use of hotels to house asylum seekers continues, as does debate around it²⁹; and so does our work with this group. Today those in 'contingency accommodation' in hotels with set meals currently receive £8.86 per person per week to live on; toiletries, fresh fruit, baby milk, nappies and other essential items are meant to be provided by Mears Group but testimonies indicate that this is not always the case.

Then-Prime Minister Rishi Sunak's December 2022 pledge to "abolish the backlog of initial asylum decisions" by end 2023 led to a unprecedented number of positive decisions being issued in a short time, beginning in NI in late summer 2023³⁰. The Home Office changed its guidance around

²⁸ <https://www.nlb.ie/blog/2023-03-human-rights-defenders-kind-economy-activists-take-the-lead-in-making-change>

²⁹ See *inter alia* recent press coverage at <https://www.belfasttelegraph.co.uk/news/northern-ireland/number-of-asylum-seekers-in-ni-hotels-falls-but-stays-too-long/a437818994.html> and Hansard record at <https://hansard.parliament.uk/lords/2024-11-25/debates/847F5E16-371B-4308-BC02-29F9E9CF60E4/AsylumSeekersHotelAccommodation>.

³⁰ See <https://www.gov.uk/government/speeches/pm-statement-on-illegal-migration-13-december-2022>. According to statistics obtained by PPR through Freedom of Information, the Home Office issued 932 asylum decisions in Northern Ireland between 1 August 2023 and 19 March 2024. Of these, 876 were positive decisions to grant refugee status; 49 were refusals; and the

‘discontinuing’ asylum support and moving newly recognised refugees on from asylum accommodation, speeding the process up -- despite the inability of the Northern Ireland Housing Executive to cope with the new caseload. (The Housing Executive is not alone: recent reporting indicates that across the UK, this expedited decision-making led to a 251% increase in people evicted from asylum accommodation becoming homeless³¹.)

As mentioned above, for those whose claim is denied, the ‘No Recourse to Public Funds’ designation means being barred from accessing even homeless shelters – leaving destitute people at serious risk of harm or exploitation.

For those whose asylum claim is approved, having their account validated and being granted refugee status is clearly a positive step for individuals and families. However, the 28-day countdown imposed by the Home Office in August 2023 has caused real worry and distress. Like many others in the voluntary sector we welcome the December 2024 decision by the Home Office to extend this period to 56 days on a trial basis until June 2025³², but we caution that without changes to process and investment in social housing, newly recognised refugees will still fall off a cliff edge into homelessness and destitution. For parents who had been denied the right to work and support themselves (other than the above-mentioned £8.86 per person / week stipend) and who as a result had no savings or financial cushion of any kind, being told that all asylum support was soon to be cut threatened their wellbeing.

In terms of accommodation, the private rental sector is closed to them due to the work ban and related lack of savings for a deposit. When they are effectively made homeless, responsibility for housing them passes to a Northern Ireland Housing Executive already labouring under a social housing waiting list of over 48,000 households (more than six out of ten of them also legally homeless³³). To try to avoid homelessness and destitution, in November 2023 PPR called for a cold-weather moratorium on evictions from asylum accommodation³⁴, which was eventually implemented in December – January 2023.

As it stands, we have witnessed the Housing Executive and Mears literally advising people to turn up at NIHE offices on the day of their eviction from asylum accommodation, with their families and belongings, and wait for NIHE staff there to arrange something for them. People have done this only to wait the entire day. Due to the gap between social housing demand and supply, and the short notice of this new need, in practice what the Housing Executive appear to be doing is making unprecedented use of hotels as emergency temporary accommodation – a stopgap to prevent people under its responsibility becoming street homeless. It is not clear what – or even whether – procurement practices are in operation to ensure the suitability and adequacy of temporary accommodation, in the context of an almost total housing shortage.

remaining seven were “unknown case types where we are unsure whether it was a positive or negative decision without a further interrogation of our data”.

³¹ <https://www.independent.co.uk/news/uk/home-news/refugee-homeless-home-office-map-council-b2667138.html>

³² <https://www.refugeecouncil.org.uk/latest/news/refugee-council-welcomes-change-to-the-move-on-period-for-refugees/>

³³ <https://www.nlb.ie/investigations/FOI/2024-03-what-happens-when-the-state-deprioritises-social-housing>

³⁴ <https://www.nlb.ie/blog/2023-11-ppr-calls-for-a-cold-weather-moratorium-on-evictions>

So people are frequently moved from one hotel, under Mears, to another, often distant, hotel, under the Housing Executive. These new Housing Executive hotels are, for starters, often far from children's schools, as the Education Authority has had cause to call out, given their work in finding the school placements for children in the first place. They are frequently far from GPs or consultants who are giving people much-needed care – many of these medical professionals have written to the Housing Executive urgently requesting that their patients be moved back to within reach of their services. Some people living with disabilities have been placed in unsuitable or inaccessible accommodation, without any level of support.

Barriers to the right to work

People awaiting an asylum decision

People in the asylum system are barred from working by UK law. After 12 months waiting (as long as the delay is not of their making), official guidance is that they may apply to work – but only if they meet a set of very strict criteria. As the then UK Minister for Legal Migration and Delivery wrote in February 2024, in response to a question from an MP,

asylum seekers who have had their claim outstanding for 12 months or more, through no fault of their own, are allowed to work. Those permitted to work are restricted to jobs on the Shortage Occupation List. *This is based on expert advice from the independent Migration Advisory Committee*³⁵. (emphasis added)

This was incorrect. In fact, as far back as its 2021 annual report the Migration Advisory Committee not only questioned Home Office policy on the work ban and recommended a review, but also put forward the suggestion of allowing asylum seekers to work, in any occupation, after six months³⁶.

The MAC repeated this view as recently as October 2023³⁷. The Home Office replaced its 'shortage occupation list' with a 'skilled worker visa' immigration salary list in April 2024³⁸; asylum seekers are still not permitted to work in any position after 12 months, not to mention after six as recommended by the MAC. As recently as October 2024, the Labour government continued to misrepresent the MAC advice on asylum seekers working rather than comply with it³⁹. Research into asylum seekers' experience of trying to obtain and exercise permission to work in the UK, published in December 2024, found that

³⁵ <https://questions-statements.parliament.uk/written-questions/detail/2024-02-16/14281>

³⁶ MAC Annual Report, Dec 2021 at

https://assets.publishing.service.gov.uk/media/61b8d25f8fa8f5037e8ccd3b/2021_Annual_Report_combined_FINAL_v3.pdf, p. 32 (emphasis added): "the MAC would recommend the Government review their policy on allowing asylum seekers to work. One option might be to allow applicants to work if an initial decision has not been made within six months. We also question the value of the current restriction that allows work after 12 months only on SOL [Shortage Occupation List] occupations – *this was never the purpose of the SOL, and the original reasoning behind this restriction does not seem to be particularly coherent.*"

³⁷ MAC Review of Shortage Occupation List, 2023 at <https://www.gov.uk/government/publications/review-of-the-shortage-occupation-list-2023> (pp. 16, 33-34)

³⁸ <https://www.gov.uk/government/publications/skilled-worker-visa-immigration-salary-list>

³⁹ <https://questions-statements.parliament.uk/written-questions/detail/2024-10-21/10285>

the path for asylum seekers to access work is narrow and obstructed. While the government provides the concession of a 'permission to work', the process to acquire this and the restrictions around it can lock asylum seekers out of the UK labour market.⁴⁰

Newly recognised refugees

New refugees now face unprecedented barriers to finding work. Part of this is due to their being placed by the Northern Ireland Housing Executive in hotels in far flung areas, away from any community network or contacts they have built up. They are told by the Housing Executive that they will be moved somewhere permanent as soon as possible, but they have no idea when this will be, or where. As such they are in no position to apply for work, even if an employer was willing to hire them in such uncertain circumstances.

Another barrier is transport. Northern Ireland is a car-dependent place; for a time people did have public transport passes provided by the Department for Infrastructure on a pilot scheme, but this has since ended. Many people are being placed in hotels without access to buses or train lines, and without the resources to pay taxis to even get to one-off interviews, much less regular work.

Finally, parents face an additional obstacle in childcare. Families are moved out of area, away from their children's schools. They are told that the new housing is temporary, and that the Education Authority will not help them to change their children's schools, even if they are unable to attend due to distance and lack of transport. This means that children are effectively out of school altogether, and with no childcare during the day parents find it difficult to look for work.

Newcomer students' access to the right to education

NI's Department of Education reported enrolling 19,470 'newcomer' students – or 5% of the total school population -- in 2022/23⁴¹. It said around seven out of every ten newcomer pupils were in primary school years 1-7.

The information provided indicates that of these, only a relatively small proportion would be from families with experience of the asylum system; for instance, four out of five of the most frequent mother languages amongst the newcomer pupils were European (Polish, Lithuanian, Romanian and Portuguese). The 3rd largest group (just under 8%) was made up of Arabic speakers.

Roughly the same percentage of newcomer children (28%) were entitled to Free School Meals as amongst the wider school population (27%). Overall, 16% of the newcomer children were reported as presenting with Special Educational Needs, compared to 19% amongst the school population as a whole.

Interestingly, the annex (p. 26) to the UK government's August 2024 response to the Committee's List of Issues report refers at length to the body referred to below under 'barriers to education' and new (September 2024) barriers to education'. The description is useful to understanding the issues we raise. According to the UK government text,

⁴⁰ Focus on Labour Exploitation, December 2024 at [I-kept-waiting-and-waiting-The-realities-of-asylum-seekers-restricted-right-to-work-in-the-UK-Final-2.pdf](#), p. 28.

⁴¹ <https://www.education-ni.gov.uk/sites/default/files/publications/education/Newcomer%20Pupils%202022.23.pdf>

the [NI] Department [of Education] also funds the Education Authority's (EA) Intercultural Education Service (IES), which aims to meet the additional educational needs of the newcomer, Roma and Traveller communities by providing advice and support to families with school-aged children. The main areas of support include school admissions, transfers, free school meals, uniforms, transport, multi-disciplinary meetings and appeals - including Special Education, Behaviour Support, Education Psychology and Education Welfare.

As of this writing, many of those services are no longer being offered to some children in asylum-seeking or newly-recognised refugee families. The Department of Education recently opened a consultation on eligibility for free school meals and uniform grant which ran until February 2025⁴².

Barriers to education for children in the asylum system

From mid-2021 people in the asylum system increasingly began to be placed by the Home Office (through its contracted asylum accommodation provider Mears Group) in 'contingency' accommodation in hotels. People placed in these hostel settings reported that many newcomer children could not access a school place⁴³ -- for primary age children, a violation of even the 'minimum core' of the right to education. With no play, recreational, or alternative activities in the hotels, primary and secondary age children out of school felt acutely the lack of social contact, structure and a daily routine.

By autumn 2022, enrolment of primary age children (aided by Anaka Women's Collective⁴⁴) had improved, but parents of older children faced ongoing barriers, as many secondary schools regulated their intake to keep their results high⁴⁵. Young people who managed to secure highly sought after places at 'College of Sanctuary' Belfast Met were blocked from attending by the lack of transport assistance, given their very minimal Home Office allowance (now £8.86/week)⁴⁶. The transport situation improved markedly in 2023 with the advent of the Department for Infrastructure's public transport travel card scheme, which ran for a year and closed in October 2024⁴⁷.

Difficulties in accessing secondary school

The Education and Libraries (NI) Order 1986 sets compulsory school age at 4 years, continuing up until the end of the school year in which the child turns 16⁴⁸. The reality for asylum seeker children is different. Key stage 4 (years 11 and 12, so 15- and 16-year-olds) are by far the most unlikely to

⁴² Consultation documents are at <https://www.education-ni.gov.uk/consultations/review-free-school-meals-and-uniform-grant-eligibility-criteria>

⁴³ <https://www.nlb.ie/blog/2022-05-accommodating-cruelty-the-use-of-hotels-as-contingency-accommodation-part-two> and <https://www.nlb.ie/investigations/FOI/2022-04-foi-requests-reveal-huge-increase-in-the-use-of-hotel-accommodation-for-asylum-seekers-and-their-families>

⁴⁴ <https://www.instagram.com/anakacollective/>

⁴⁵ <https://www.nlb.ie/blog/2022-11-the-kind-economy-human-rights-a-report-on-the-state-of-education-in-contingency-accommodation-pt-2>

⁴⁶ <https://www.nlb.ie/blog/2022-11-the-kind-economy-human-rights-a-report-on-the-state-of-education-in-contingency-accommodation-pt-1>. For the allowance amount, see <https://www.gov.uk/asylum-support/what-youll-get>

⁴⁷ <https://www.nidirect.gov.uk/articles/public-transport-travel-card-asylum-seekers>

⁴⁸ <https://www.legislation.gov.uk/nisi/1986/594> para. 46

find a place, though even some 13 and 14-year-olds struggle⁴⁹. This issue features in recent research from QUB and the Nuffield Foundation⁵⁰ and also from Queens University Belfast and Anaka together with the young people of the 16+ Education Equality Campaign:

the closer a young person from refugee or asylum seeker background is to 15 or 16 – the longer the wait or more difficult to enter traditional education routes. All too often, the only recommendation for these young people are English classes – the same ones adults are in⁵¹.

The Department for the Economy has responsibility for employment and skills training, including apprenticeships, for 16+ young people⁵²; but has yet to adequately respond to the needs of this group.

A 2023 survey carried out by PPR and Anaka amongst 35 Belfast asylum seekers aged 16-25 who were out of education during term time revealed that 40% had attended high school before coming to NI, and another 40% had completed it. These young people have high aspirations and described themselves as working towards a wide range of professions and roles. But they need help in getting there: only 30% reported attending English classes (despite the fact that over half had been here for six months or more). Two thirds of them described their level of English as beginner or pre-intermediate.

In response, beginning in the summer of 2023 Anaka and #KindEconomy partners organised a network of volunteer teachers from the local community and from amongst people seeking international protection here, to set up and provide classes in a range of subjects for young people unable to access what should be theirs by right from the state.

This was followed by a 2023-24 project with Queens University Belfast for the 16+ age group, linking them with trainee English as a Second Language teachers at the university. These classes led on to a participatory research project, the 16+ Education Equality Campaign (referenced above). In contrast to case studies from Leicester (England), Glasgow (Scotland) and Wales, of holistic English language based programmes tailored to the specific needs of this group of young people⁵³, in NI young people reported that ESOL classes here were aimed at their parents' generation. This made them feel demotivated and unwelcome.

New (September 2024) barriers to education imposed on children in hotel accommodation

On 23 August 2024 the Committee on the Eradication of all Forms of Racial Discrimination published its Concluding Observations on the UK's implementation of the International Convention on the Eradication of all Forms of Racial Discrimination. In the area of education, it recommended that the UK

Strengthen its measures to ensure the availability, accessibility and quality of education for children belonging to ethnic minority groups, notably children belonging to Gypsy, Roma and

⁴⁹ See for instance <https://www.nlb.ie/blog/2022-11-the-kind-economy-human-rights-a-report-on-the-state-of-education-in-contingency-accommodation-pt-2>

⁵⁰ <https://www.qub.ac.uk/public-engagement/Filestore/PubAffFiles/Filetoupload,1862560,en.pdf> (p. 27, 64, 65)

⁵¹ <https://www.library.nlb.ie/book/76>, p. 1

⁵² <https://www.economy-ni.gov.uk/topics/employment-and-skills-programmes-including-apprenticeships>

⁵³ See <https://www.library.nlb.ie/book/45> for more information

Traveller communities, children of African descent and migrant, asylum-seeking and refugee children.

Take all measures necessary to reduce the attainment gaps, including by adopting and implementing an action plan to improve education attainment of children belonging to minorities, with specific and tailored measures for pupils belonging to Gypsy, Roma and Traveller communities, pupils of African descent and migrant, asylum-seeking and refugee pupils, and in close consultation with the families of affected communities⁵⁴.

In contrast to these recommendations, NI education authorities appear to be moving in the opposite direction. On 29 August 2024, a number of families placed in hotel asylum accommodation by the Home Office contractor Mears Group, contacted PPR to say that they had just had a meeting with Education Authority staff around children's enrolment for the upcoming school year. They reported that EA staff had made them understand that they would not be able to enrol their children in schools as long as they were residing in the hotel.

Parents were understandably perplexed. In previous years, many children residing in hotels had obtained school places and regularly attended school, with transport, uniform and meals assistance from EA. In fact several children enrolled last year and living in the same hotel as this particular group of parents, continue to do so.

When questioned by PPR, the EA provided two documents (which they described as new 'internal working arrangements'). One stated that the policy change was made on the basis of information from Mears that the average stay for families in the hotels had "fallen significantly to approx. 4-5 weeks" (a characterisation that families themselves say is highly inaccurate). On this basis, the new EA advice was, "it is better to wait to make an application for school when in their MEARS dispersal housing as this is likely to be a longer-term school for their child." The EA said it would resume its responsibilities to assist with enrolment and access to Free School Meals, uniform grant and transport assistance if the family had still not been moved at the end of this waiting period⁵⁵.

This change was made at a time when official figures of people placed by the Home Office in contingency asylum accommodation in NI hotels have declined to by far their lowest point in over two and a half years⁵⁶; demand for the EA's services emanating from asylum seekers is therefore empirically much lower than it has been. Asylum support levels have not changed, leaving families just as reliant as before on Free School Meals, uniform grant and transport assistance; for the EA to write "we are not withholding the right to education from any child" in limiting assistance and access to this vital financial support seems disingenuous. Most importantly, the racist violence of August 2024, some of which was targeted directly against asylum hotels, has left families and children feeling more isolated, vulnerable and fearful than ever. For many, school is the single most

⁵⁴ *Op. cit.*, CERD, 2024, para. 46

⁵⁵ See <https://www.library.nlb.ie/book/86> for more information

⁵⁶ *Op. cit.* at <https://www.gov.uk/government/statistical-data-sets/immigration-system-statistics-data-tables#asylum-and-resettlement> (table ASY_D09). There were only 301 people in asylum hotels here at end June 2024, down from over 1,000 throughout end 2022 and much of 2023 (these were the statistics available at the time the Education Authority made its decision; more updated ones have come out since and are included elsewhere in this submission).

significant entry point for integration into the local community; withholding access to it in the wake of such a traumatic time seems misguided at best.

The Education Authority also provided a second document detailing changes with regard to its treatment of children of newly recognised refugees placed in Housing Executive emergency accommodation in hotels. Given, it says, that “there are no predictable time frames as to how long a family will be in this situation or how many moves they will endure into how many diverse localities”, children are to remain enrolled in whatever school they were in before the grant of refugee status – no matter how distant that school is from their new accommodation, or how impossible it is for their parents to get them there⁵⁷. The EA actually recognises that “unless they are housed in accommodation within walking distance (or a short bus journey) of their original school they are not going to be able to attend school” – but offers no alternatives.

The EA said that it would review these policies at end October, but as of this writing, no further information has become available.

6 Are you aware of the Racial Equality Strategy 2015-2025?

Yes.

7 If yes, to what extent do you agree the Strategy has been successful?

The organised racist violence which exploded in August 2024, following a year-long uptick in racist attacks categorically demonstrate the failure of the Racial Equality Strategy to address one of its key objectives, the elimination of prejudice, racism and hate crime. This ought to provide pause for reflection and evaluation about the effectiveness of the current approach to tackling racist crime, particularly the emphasis the strategy places in a good relations approach, without an equivalent regard for the value of justice for those impacted by violence.

We note that the independent review of the Racial Equality Strategy 2015-2025 – submitted in March 2024 but not made public by the NI Executive until the eve of the Christmas holidays, 23 December 2024 – found that

the aims of the strategy have been undermined by the lack of: an action plan; involvement of people with lived experience; and a process for ethnic monitoring; and could have been enhanced by more attention to governance⁵⁸.

⁵⁷ In just one example of how this policy works out in practice, a BBC press report from September 2024 (at <https://www.bbc.co.uk/news/articles/cx2y4m33pno>) related in detail how one newly recognised refugee family has been forced into debt, having had to borrow money to buy and run a car so that the children can maintain their existing places at their school in Belfast after the family were moved to temporary accommodation in a hotel in Newry 35 miles (56 km) away. An update on this family’s most recent enforced move, in November 2024, is at <https://www.bbc.co.uk/news/articles/c98d20xeeeyo>.

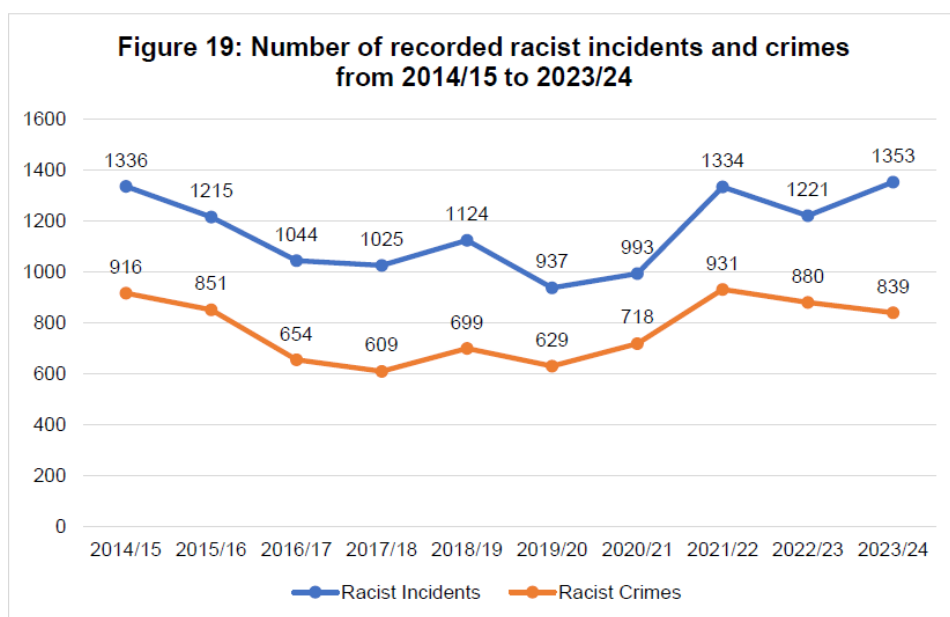
⁵⁸ Independent Review of the progress on the implementation of the Racial Equality Strategy 2015-25: final report at <https://www.executiveoffice-ni.gov.uk/sites/default/files/2024-12/independent-review-of-the-progress-on-the-implementation-of-the-racial.PDF>, p. 2

As noted above, the review proposed concrete actions in each of these four areas, including amongst others development of an action plan and budget, a regular review process for the strategy and a programme for engagement with marginalised groups.

PPR has evaluated the data available on some of the indicators of the 2015-2025 Strategy, set out in Annex B of the document, particularly those relating to Outcome 2:

- To combat racism and race hate and to provide effective protection against all manifestations of racism and racist crime. To provide redress and to have a victim-centred approach.
- Through the Ministerial Panel, we will work with DOJ to develop our approach to tackling race hate crime.

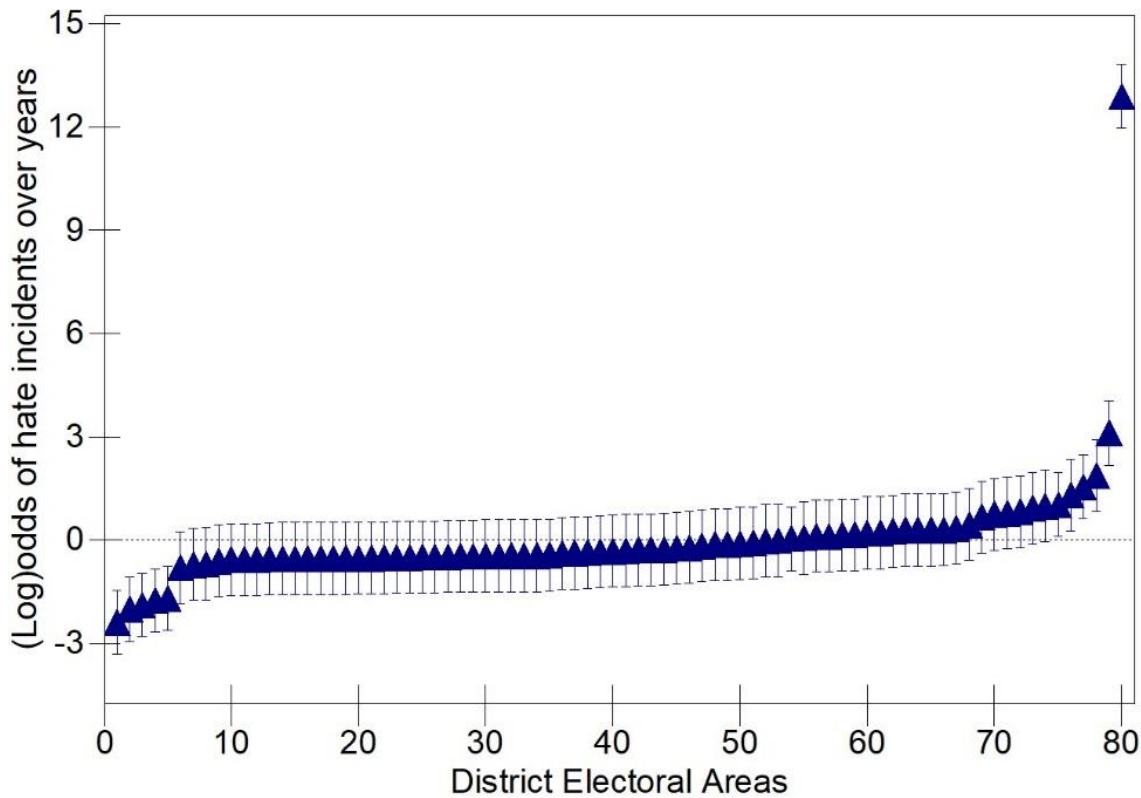
Since the publication of the Racial Equality Strategy, the number of racially motivated crimes has largely remained stable, see figure below extracted from the [7th Independent Reporting Commission](#) report. There has been no sustained fall in the numbers of either racially motivated incidents or racially motivated crimes in Northern Ireland as a whole.



Source: PSNI Bulletin: Incidents and Crimes with a Hate Motivation Recorded by the Police in Northern Ireland

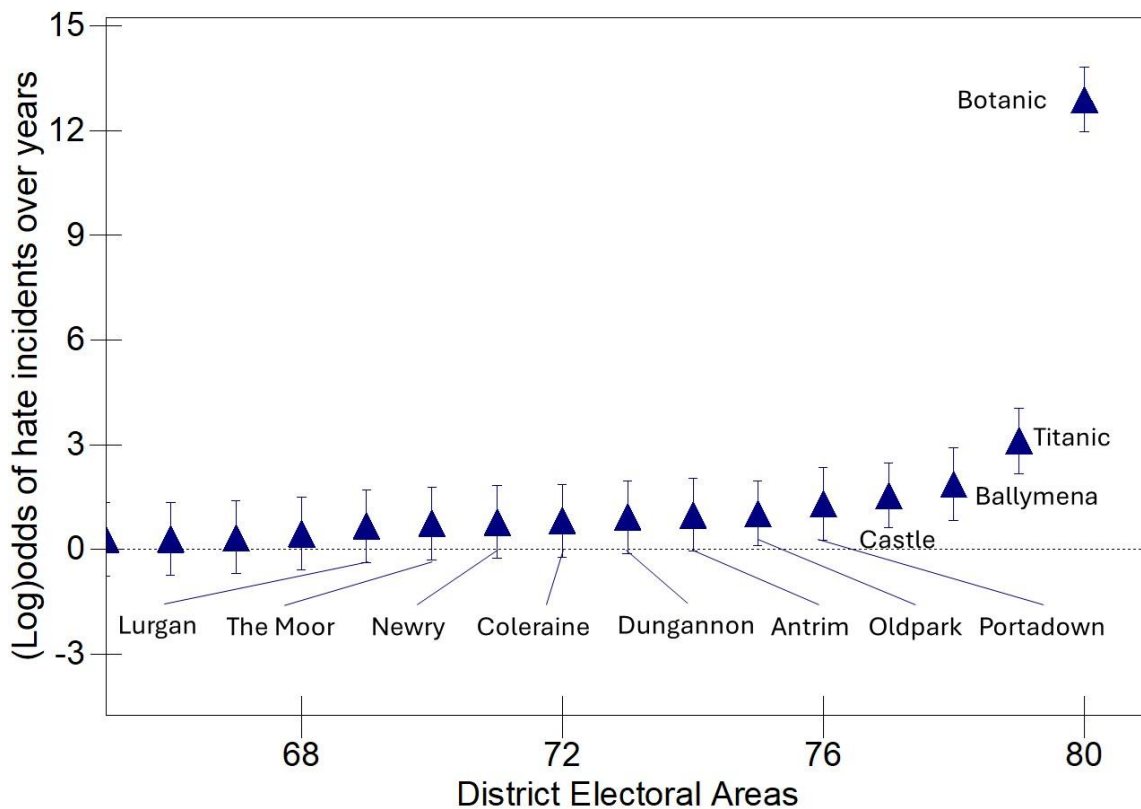
However, a different picture emerges when considering racially motivated crimes and incidents at a more local level. From analysis of 2007-2023 data, **hate incidents have been more likely in some District Electoral Areas (DEAs) relative to others**. Each triangle in Figure 1 combines ward data, within a DEA, and we can compare across DEAs to show the likelihood of race hate incidents relative to the average (the 0 line in the graph) in any given DEA. While most DEAs have a comparably low likelihood of incidents, **a small number of DEAs have a comparably higher likelihood of incidents**. For example, the two triangles on the right hand side of the Figure below represent Botanic and Titanic DEAs.

Figure 1 Odds of hate incidents by DEA over time



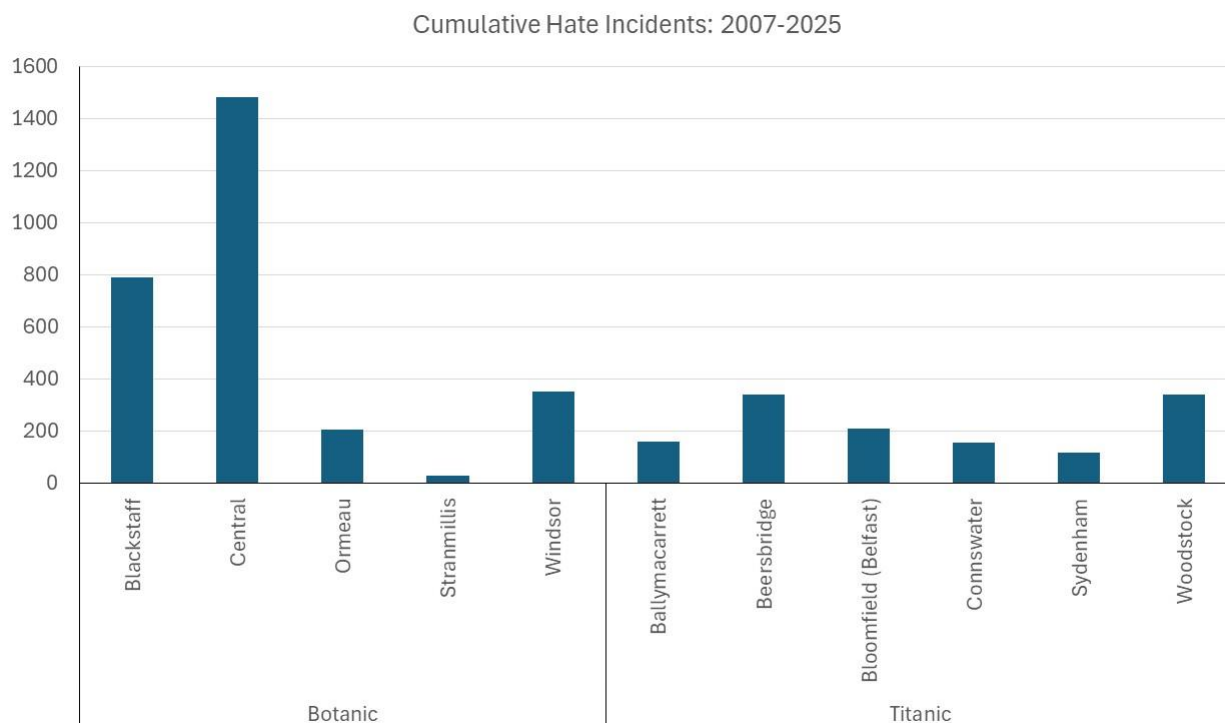
In Figure 2, we 'zoom in' on those DEAs more likely to have experienced hate incidents over those 17 years. As can be seen from the chart, race hate incidents are significantly more likely to take place in the Botanic area of Belfast.

Figure 2 DEAs with the highest odds of hate incidents



Drilling further down into the data, Figure 3 shows which wards in the Botanic and Titanic DEAs have the highest cumulative number of race hate incidents. The higher numbers of race hate incidents in the areas of Blackstaff, Central Belfast, Windsor, Beersbridge and Woodstock are a cause for concern which should also imply an increase in resources in these areas.

Figure 3 Cumulative Hate Incidents in Botanic and Titanic



This kind of analysis, **which we have not seen produced and made public by those with the resources and the responsibilities to address these issues, is critical to informing the allocation of resources and responses to race hate crime.** And we know there is other possible data available from e.g. restorative justice organisations which would provide further information on patterns of attacks, which could in turn assist both the policing and the community and political response. Following a spate of racist attacks on Black owned businesses in south Belfast in 2023, PPR convened a meeting of directly impacted individuals and public bodies and requested by letter that relevant Departments could work together to gather and analyse data in relation to racist hate crime, in order to inform strategy and public spending on this issue. The then Permanent Secretary of the Department of Justice declined, stating that:

‘as previously advised, the PSNI and PPS are responsible for publishing reported hate incidents/crimes and outcomes in relation to cases involving offences aggravated by hostility on their respective websites. Other organisations may also hold information on this and related issues for the purpose of their business. The Department of Justice does not hold information on this and it is not within the remit of any Permanent Secretary to instruct any independent public authority to gather, analyse or publish data.’

We note that in its most recent review of the UK, the UN Committee on the Elimination of All Forms of Racial Discrimination set out that the UK should

Systematically collect disaggregated data on racist hate crimes, including cases involving intersectional motivations, ensure that measures to combat racist hate crimes are developed with the meaningful participation of affected groups, and undertake a thorough assessment of the impact of the measures adopted;

Further, it urged the UK to investigate the links between race hate crime and paramilitary and sectarian activity:

The Committee recommends that the State party, in particular the government of Northern Ireland, adopt robust measures to prevent and combat paramilitary racist violence and intimidation against ethnic minorities and migrants in Northern Ireland, systematically collect information on these acts of violence and intimidation and ensure that cases of paramilitary racist violence and intimidation are promptly and effectively investigated, prosecuted and punished with appropriate sanctions and that victims have access to effective protection and redress.⁵⁹

Just last week, the UN Committee on Economic, Social and Cultural Rights urged the UK and devolved governments to:

“Strengthen measures to prevent and combat intimidation by paramilitary groups against ethnic minorities and migrants in Northern Ireland to ensure their access to adequate housing and to prevent *de facto* segregation, collect data on such acts and ensure that they are promptly and effectively investigated.”⁶⁰

In 2015, the OFMDFM indicated in paragraph 1.29 of the Racial Equality Strategy that it was ‘investigating the advantages and disadvantages’ of taking a holistic approach to addressing racism and sectarianism as recommended by the Committee on the Elimination of All Forms of Racism at that time. We wonder if the elapsed decade has provided the OFMDFM with the appropriate length of time to reflect on these recommendations.

9. What do you feel could have been improved in the current Strategy?

VPRS and asylum issues in the strategy

It is accepted that the current Strategy was drafted and signed off a decade ago, at a time when neither Brexit, nor the COVID-19 pandemic nor the climate and geo-political instability we see now were necessarily within the foresight of the drafters.

However, despite the lengthy war in Syria at the time of drafting, it is clear that there was very little anticipation of the fact that new communities would continue to arrive within the north of Ireland, and seemingly little was done to prepare for this eventuality. We note that paragraph 2.16 purports to recognise the readiness of Ministers to welcome Syrian refugees under the VPRS scheme.

However, throughout this period, PPR organised alongside many families welcomed through this scheme, who were placed in substandard housing and left without support by public sector bodies, documented in our report [‘We came here for sanctuary.’](#)

⁵⁹ CERD/C/GBR/CO/24-26

⁶⁰ E/C.12/GBR/CO/7, para 47 (h)

We note also that the professed commitment of Ministers in paragraph 2.15 to ensure that asylum seekers did not suffer injustice in the asylum system has evaporated, to be replaced by apathy, buck-passing and almost total indifference. The Kind Economy groups has [repeatedly brought issues of injustice affecting asylum seekers to the attention of Departments, Ministers and The Executive Office as a whole, all too often, to little avail](#). We have in fact provided many complaints to the Executive Office in relation to rights issues facing asylum seekers and were asked by the TEO to desist from sharing these.

The NI Strategic Migration Partnership, described by the Strategy as a ‘multi agency, cross-party and cross-departmental body working to reflect the regionally specific needs of NI in the development and implementation of UK immigration policy’ was hosted for 11 years by the NI Local Government Association and ceased to function in early 2022. This coincided with some of the highest numbers of asylum seekers arriving in Northern Ireland in the last few years, and the decision of the UK Government to commission hotel providers to provide accommodation. Despite this, the NISMP was not reconstituted nor any of its functions formally adopted by other agencies until the spring of 2024.⁶¹

Any future strategy development process should take the opportunity to reflect on how quickly the socio-political and geo-political context can change and how this can impact on migration flow, which is likely to accelerate as the impacts of climate change worsen. This has implications for the way in which public bodies respond; it is accepted that UK Home Office policy may change but devolved institutions continue to have human rights obligations in important areas such as health, education, transport and equality and therefore cannot wash their hands of the way in which their decisions impact upon asylum seekers and refugees.

Need for greater accountability

The central thrust of the Racial Equality Strategy is around the good relations element of s75 of the Northern Ireland Act and the T:BUC strategy. The desire to build bridges is understandable, but in the case of the strategy comes at the expense of proper accountability and justice for racist actions and behaviours. For example, given the stated objectives of the Strategy to eliminate prejudice, racism and hate crime, it is striking how little focus and attention is given to the investigation, prosecution and charge of those responsible for racially motivated hate crime. The indicators set out under ‘Combating prejudice, racism and hate crime’ include only monitoring of the number of ‘racial incidents and crimes’ [sic], but make no reference to convictions rates for such crimes. Had they done so, there would be recognition that at times, the conviction rate for racially motivated crimes has at times fallen as low as 10% in Belfast.⁶² This would have created some interrogation of the issues of institutional racism, discussed in section 3.17 of the strategy, particularly within the policing and justice system. As noted above, the hostile environment policy set out by the UK Government has also resulted in a deepening distrust of the PSNI by people in the asylum system,

⁶¹ [AIMS Portal](#)

⁶² See for example <https://www.nlb.ie/investigations/policy-watch/163/existing-state-mechanisms-to-support-victims-of-hate-crime>

who though they were innocent victims of other criminal behaviour, still had their data shared with the UK Home Office by the PSNI.

Given the declared intention of the Strategy to take a victim centred approach to race hate crime, we have found it surprising for example, that the Department of Justice has no monitoring system in place to record the ethnic identity of those applying for criminal damage compensation⁶³, criminal damage often being a way in which homes and business are targeted by organised racist violence. **This is just one example of many missed opportunities to gather and use data which could help to identify patterns of violence and therefore take a properly preventative approach,** noted above under q7.

Without a focus on justice to properly address racist violence and behaviour through appropriate sanctions of those proven to have committed such crimes, there can be no true racial equality.

⁶³ From information obtained by FOI.