Submission to the National Integration Strategy 2015-2020

THE PEOPLE FOR CHANGE FOUNDATION
Prepared by the People for Change Foundation
Introduction

The People for Change Foundation welcomes the opportunity to make this submission as part of the Public Consultation regarding the development of Malta's Integration Strategy for 2015-2020 within the framework of the ‘Mind D Gap: Together we can make a Difference’ project.

As a human rights think tank, we have long called for the adoption of such a strategy and welcome the commitment of the government, and specifically the Ministry for Social Dialogue, Consumer Affairs and Civil Liberties to develop policies in this regard.

Effectively engaging with integration requires political will and courage to participate in difficult discussions and not coward away from criticisms. An integration policy has been lacking for far too long, and it is high time that we move towards the adoption and implementation of these measures.

This document is organized as follows: the first part discusses the differences between an integration policy and an integration strategy and the need for both. The second engages with principles and priorities in the development of an integration policy and strategy. The third lists integration related outputs published by The People for Change Foundation in recent years. These submissions are informed by over 8 years of research on various aspects of migration and integration undertaken by The People for Change Foundation.

Developing an Integration Package

The consultation document refers to the adoption of an integration strategy. We feel that this is a worthwhile approach, which could provide effective strategic objectives in the area. However, we also feel that the strategy should be in pursuance of a national policy, setting out the meaning of integration as understood in the local context, as well as clearly stipulating what can be achieved. We propose that Malta should adopt two concurrent and complimentary documents:

1. An integration policy
2. An integration strategy
The integration policy will set out the national meaning of integration and the key priorities in the context of integration and the way integration can be monitored. The integration strategy will provide the roadmap towards the achievement of integration for the first 3 to 5 years from the adoption of the policy. The strategy will mark the practical implementation arm of the integration policy. Finally, the initiatives will allow for short-term project implementation of the policy’s and strategy’s recommendations and indicators.

An Integration Policy should include:
1. A definition of integration adapted to the Maltese context, and a description of what an integrated migrant looks like
2. Strategic objectives for the short (1 to 2 years) medium (3-5 years) and long term (5years+)
3. Measures and indicators for monitoring the outcomes of the policy thereby informing the development of strategies to address concerns
4. A clearly set out, fit for purpose, structure for the implementation and oversight of the integration policy

The integration strategy, on the other hand, should:

1. Be strategic and forward looking, yet realistic and grounded in local realities
2. Move beyond the current ‘actors’ of integration and seek to engage a broader community of stakeholders at various levels:
   a. National and Local
   b. Government, Civil Society, Community Groups
3. Be a fluid document – subject to changes and developments and taking into account changing contexts and realities
4. Clearly contextualised within the broader political, legal and socio-economic context at the national and international levels whilst being mainstreamed across all relevant areas of policy.

Stakeholders and Actors
The policy and strategy should promote shared responsibility for integration that considers the role of various actors. However, this should not replace the role of the national Government in the integration of different parts of society through the assumption that civil society actors will affect migrant integration. Especially when it comes to basic services, the responsibility vests in the government, and whilst NGOs can play a complementary role one should not assume that these services will be provided in the absence of government support. At the same time, an integration strategy will necessarily include the involvement of various groups and entities, and we consider it critical that the range of integration stakeholders be broadened from the current perspective to include, for instance:

- Religious institutions and organizations including Churches, Mosques and Synagogues and the social and religious orders and groups linked to them
- Schools, colleges and other educational establishments (including the academic community)
- Sports, drama and other leisure entities
- Trade Unions & Professional Associations, Employers Associations and the Business Community
- Service Providers (Public and Private) and their representatives
- Local Councils and administrative committees
- Politicians, Political Parties and Parliamentarians
- Media and Prominent Personalities
- NGOs, philanthropic organizations and Migrant Community Organizations (MCOs)
- Research organizations and think tanks
- Other entities working on related issues or with the people covered by

We appreciate that project limitations mean that the project must necessarily focus exclusively on Third Country Nationals. However, for an integration policy and strategy to be successful they must necessarily consider the situation of all
groups of migrants in Malta including European Union nationals as well as asylum seekers and beneficiaries of international protection.

Key Principles

An integration policy must be based on key guiding principles, including:

1. **A holistic understanding of integration** that addresses the whole integration process starting with ability to enter (particularly in the case of family members of migrants) and goes on to cover permission to stay, access to services, space for political participation, and permission to settle when and if desired

2. **Integration Mainstreaming**, whilst giving importance to integration as a singular policy field is important, successful integration of migrants necessarily requires the mainstreaming of integration and services throughout a whole range of policy fields including but not limited to: migration, employment, education, health and anti-discrimination

3. **Good Governance, accountability and transparency** should be at the heart of all integration institutions and processes including in decisions regarding status and entitlements

4. **Measured integration**, with an adequate understanding of the meaning of successful integration and the steps required for it to be achieved, together with the policy and strategy requirements to facilitate this process

5. **Integration is a dynamic two way process** meaning that integration measures should address, and responsibility for integration should vest both in migrants (as individuals and as communities) and in the local community

6. **An approach to integration that is as diverse as the groups that are involved in it**, taking into account the varying realities, opportunities and challenges faced by the various categories and groups of migrants as well as changing definitions of local and migrant

7. **Sensitivity to vulnerability**, and an effort to work with populations that may find integration particularly challenging

Integration Monitoring

At The People for Change Foundation, we strongly support principle 11 of the Common Basic Principles of Migrant Integration which provides that: developing clear goals, indicators and evaluation mechanisms are necessary to adjust policy, evaluate progress on integration and to make the exchange of information more effective. A failure to adopt such measures will jeopardise the impact of the policy and strategy
not least by not allowing for that impact to be measures and any inefficiencies to be addressed.

Any integration monitoring and evaluation should focus on outcomes rather than focusing exclusively on outputs. It should not only consider how many events are organized or reports published but rather should focus on the actual outcomes of integration most notably on the basis of greater equality between TCNs and Maltese nationals.

**People for Change Publications on Integration**

Over the past years, The People for Change Foundation has developed a number of outputs relating to integration. Some are based on legal analysis, others on social research. We believe in a society that is inclusive and affords equal opportunities to people regardless of their race, ethnicity, cultural and national origin or other identity. Here is a selection of outputs which have also been attached to these submissions:

- Recommendations based on the national results of the Migrant Integration Policy Index
- MIPEX National Results: [www.mipex.eu/malta](http://www.mipex.eu/malta)
- The Malta Human Rights Report (Second Edition)
- Report on the Monitoring and Evaluation of Integration in Malta (ASSESS)
- A compendium of Promising Practices on the Integration of Vulnerable Migrant Groups
- A Review of the Maltese legal framework on family migration and the integration of family members
- A compendium of promising practices on the integration of family migrants
- Research on support measures for employers hiring migrants

**Additional Resources**

Beyond its own research and publications, The People for Change Foundation has also developed the Malta Human Rights Library, Malta’s only comprehensive repository of human rights documents relating to Malta. Within the library, a special collection on migration – the Malta Migration Resource Centre – has been developed including a collection of documents and materials regarding integration. This can be accessed at: [www.humanrightsmalta.org](http://www.humanrightsmalta.org) and specifically at [www.humanrightsmalta.org/integration.html](http://www.humanrightsmalta.org/integration.html).