



**INPUT TO THE
MINISTRY FOR
EUROPEAN AFFAIRS
AND EQUALITY
ON THE MIGRANT
INTEGRATION
STRATEGY AND
ACTION PLAN**

A PROJECT INTEGRATED 2018 PUBLICATION

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Credit: oditus foundation

INTRODUCTION

The Migrant Integration Action Plan

In December 2017 the Ministry for European Affairs and Equality (MEAE) published *Integration=Belonging – Migrant Integration Strategy and Action Plan Vision 2020*¹, a national policy providing for the integration in Malta of all non-nationals, including beneficiaries of international protection.

In addition to establishing a national Integration Strategy to be largely implemented by the Ministry's Integration Unit, the document – in Measure 4: Intra-ministerial migrant integration action plans – also requires all Ministries to contribute to its nation-wide implementation by committing to specific activities, to be ultimately included within a Migrant Integration Action Plan.

Through this document, we would like to contribute to the formulation of this Action Plan by suggesting activities to be taken up by Ministries and Parliamentary Secretaries as they design their own commitments. Furthermore, we hope that our recommendations will stimulate a policy thinking process where the MEAE will formulate a clearer vision on Malta's long-term integration vision. Whereas the 2017 document provides a welcome and useful starting point, we feel it does stop short of explaining the integration model Malta feels would work best in the national context and relies too heavily on a short-term approach. We are keen to engage in further discussions with MEAE in order to support the research and formulation processes leading to a more comprehensive, relevant and sustainable integration vision for Malta.

Our input is based primarily on our knowledge of the challenges faced by international protection beneficiaries as they attempt to integrate in Malta. We are keen to see an Action Plan that, on the one hand, is truly based on the rights and needs of beneficiaries of protection and, on the other hand, is realistic in relation to its implementation potential by all participating public entities.

We hope that this brief document serves as an inspiration to ambitious integration commitments, particularly for those public entities for which integration has – so far – been an unprioritized or absent consideration.

¹ Available at <https://meae.gov.mt/en/Documents/migrant%20integration-EN.pdf>.



Credit: aditus foundation

Project Integrated

Project Integrated is a joint initiative of JRS Malta, aditus foundation and Integra Foundation, implemented throughout 2015, 2016, 2017 and 2018. It is based on the understanding that refugees² require specialised attention and support in order for them to integrate in Malta. This on account of the realities of their experiences, as well as the challenges presented by a national context that is currently in the early stages of rolling out a national integration strategy and action plan.

The project seeks to address these challenges by adopting a targeted two-fold approach. On the one hand it aims to tackle the individual obstacles faced by refugees by providing legal and psycho-social support. On the other hand, the project also aims to focus on institutional elements that are key to effective refugee integration, with a view to rendering them refugee-sensitive in their approach and impact.

Refugee Integration

The specific challenges faced by refugees as they attempt to integrate in Malta have been documented in reports published through Project Integrated. Dari: Refugee Voices on Making Malta Home³ gathers data from over 80 visits to refugee homes, presenting findings in a thematic approach covering issues such as community relations and social activities, racism and discrimination, religion, mobility and employment. Our findings reveal a refugee community that is extremely reliant on its own members for integration support and initiatives. It comments on the difficulties refugees face in securing legal and regular employment, as well as affordable dignified living conditions. Interaction with Maltese people is limited to contacts at work or neighbours, yet hardly ever extending to social and cultural activities.

Struggling to Survive: An Investigation into the Risk of Poverty among Asylum-Seekers in Malta⁴ emphasises the vulnerability of refugees to poverty and financial hardships, leading to a higher-than-average incidence of mental health problems and overall lower sense of wellbeing. The report highlights how refugees' experiences in Malta, to be appreciated in the light of their broader experiences of flight, separation and possible human rights abuses or war, often include instances of severe material deprivation, accommodation problems, insufficient support for vulnerable persons, and mental health concerns. Its findings suggest that the material deprivation rate amongst the refugee population is more than 4 times higher than the rate for Malta's general population, and that reliance on social security benefits renders refugees unable to meet their most basic daily needs.

² Throughout this document, unless otherwise specified, the term 'refugee' includes all beneficiaries of international and national protection, and also asylum-seekers.

³ JRS Malta, aditus foundation, Integra Foundation, 2016, available at <http://aditus.org.mt/Publications/dari.pdf>.

⁴ JRS Malta and aditus foundation, 2016, available at <http://aditus.org.mt/Publications/strugglingtosurvive.pdf>.

INPUT BY MINISTRY/ PARLIAMENTARY SECRETARY

As mentioned above, our input is presented in a targeted fashion, in the form of suggestions to individual Ministries and Parliamentary Secretaries as they formulate their commitments for the Migrant Integration Action Plan. We acknowledge at the outset that, due to the lack of clarity as to the legal and/or political responsibility for certain matters, it cannot be excluded that specific commitments might be allocated to the incorrect entity.

Office of the Prime Minister

1. Adopt, disseminate and enforce a public service code of conduct on public relations with refugees, and ensure its regular monitoring and evaluation through, inter alia, on-going training through the Institute for Public Services.
2. Publish and disseminate to all public service-providers guidelines on entitlements of refugees, according to their individual status and clarify derivative rights status for spouses and children.
3. Establish a national pool of full-time cultural mediators and/or interpreters, to be relied upon by all service-providers in Malta and Gozo. Those entities that offer basic services and which service large numbers of refugees ought to be prioritised in their access to this national resource.
4. Access to basic services, such as medical care and social protection should not be dependent on possession of a residence permit but should instead be possible on the basis of the international protection certificate issued by RefCom.
5. The rules for denying residence permits on the basis of security considerations should be made clear and public. These should be applied restrictively and in a transparent manner, with the possibility to appeal such decisions.
6. Promote belonging and full inclusion by establishing a clear policy on facilitated access to citizenship for refugees and subsidiary protection beneficiaries, that:
 - a. shortens the current policy time-frames for eligibility to a maximum of 7 years;
 - b. gives value to individual integration efforts;
 - c. does not require self-sufficiency as an obligatory criterion for eligibility.

Parliamentary Secretary for reforms, citizenships and simplification of administrative processes

7. Facilitate access to Long-Term Residence by, inter alia:
 - a. reducing the income threshold;
 - b. organising integration and language courses that are effectively accessible to refugees;
 - c. adopting a flexible approach to assessment by considering oral, instead of written, examinations.
8. Grant access to family reunification for subsidiary protection beneficiaries and broaden the definition of 'family member' to also include dependant adults such as ageing parents.
9. Lower the fees for new residence permits following change of address.
10. Grant access to family reunification to family members enjoying international protection in other EU Member States.

Office of the Deputy Prime Minister and Ministry for Health

11. Maximise the potential of the Initial Reception Centre in order to ensure that vulnerable refugees, such as those suffering from mental health problems, with disabilities or chronic health conditions, nursing mothers, children and unaccompanied minors are identified as soon as possible after their arrival in Malta and provided with adequate care and support.

12. Organise regular health information sessions in Health Centres targeting refugees, to include information on healthcare entitlements, how the system works and how to access it. Sessions should be accessible in terms of methodology, and possibly organised in collaboration with migrant-led organisations.
13. Organise training events targeting health service providers, on refugee-specific health issues including mental health, within a framework of cross-cultural issues and how these impact treatment and compliance.
14. Increase the capacity of the Migrant Health Unit to also act as a health information focal point.
15. Clarify healthcare entitlements – including to free medicine – and the pink and yellow card system. Ensure that this information can be accessed by refugees and health care providers and is made available to them.

Ministry for the Economy, Investment and Small Businesses

16. Design refugee-specific services geared towards promoting their entrepreneurship and strengthen existing services to render them refugee-sensitive, including through the creation of culturally-sensitive mentorship programmes for refugees interested in entrepreneurship. Collaboration with migrant-led organisations is strongly encouraged.

Ministry for Education and Employment

17. Grant access to free childcare to refugees who are active jobseekers and extend childcare service hours to support parents whose working hours commence very early and/or who work night shifts.
18. Publish good practice guidelines for employers managing a multicultural workforce, covering issues such as culturally-sensitive employment policies, anti-discrimination legislation and policies, the NCPE Equality Mark, religious festivities and holidays, uniforms and appearance.
19. Provide programmes, including funding mechanisms and incentives, for employers to participate in and organise intercultural training.
20. Implement empowerment and skills-training programmes tailored to the need of refugee women.
21. Facilitate access to higher education by organising structured orientation and preparatory programmes

and removing the five-year residence requirement for refugees to access the Student Maintenance Grant.

22. Explore options to improve the assessment of academic qualifications of refugees who are unable to produce education certificates or documentation.
 23. Undertake an assessment of the past years' experiences of refugees/educators/education managers within the educational system, looking into primary, secondary, post-secondary, tertiary and adult education levels.
- Parliamentary Secretary for Youths, Sports and Voluntary Organisations.
24. Refugees who are unable to obtain a residence permit should not be barred from registering voluntary organisations and acting as their administrators.
 25. Organise youth information sessions to enable young refugees to access community services.

Ministry for Energy and Water Management

26. Publish accessible guidelines, targeting non-nationals, on how to apply for preferential water and electricity rates.
27. Issue water and electricity bills in the names of tenants.

Ministry for European Affairs and Equality

28. Adopt an indicator-based model in the national strategy, by establishing specific standards to be met and ensuring a more objective approach to data collection, evaluation, and monitoring⁵.
29. Organise public awareness-raising activities on diversity in Malta.

Parliamentary Secretary for EU Funds and Equality

30. Ensure the active and meaningful inclusion of refugees and refugee-led organisations in all consultations on national action plans relating to EU funding programmes.
31. Ensure that access to EU funding opportunities by NGOs is not limited to provision of integration-related services, but also includes important activities such as research, training (delivery and provision), seminars and conferences, public awareness campaigns, networking, etc.

⁵ A successful example of such an approach, at European level, is that adopted by MIPEX. For more information see: <http://www.mipex.eu/>. See also aditus foundation, Malta Integration Network II: Policy Indicators for Migrant Integration, 2015, available at <http://aditus.org.mt/our-work/projects/malta-integration-network/>.

Ministry for Finance

32. In the annual budget, allocate sufficient funds to integration – primarily to MEAE but also to other public entities – in order to reduce dependence on EU project funds and guarantee sustainability.
33. Eliminate those obstacles preventing refugees from opening and holding bank accounts.
34. In the context of purchasing immovable property, treat refugees as nationals by exempting them from the Acquisition of Immovable Property permit.

Ministry for Tourism

35. Publish Good Practice Guidelines for employers in the hospitality industry, encouraging them to promote a more inclusive and multicultural touristic sector.
36. Make refugees more visible in the promotion of Malta and develop a brand that is truly welcoming and inclusive.

Ministry for Home Affairs and National Security

37. Harmonise data collection in a holistic and coordinated manner across key entities such as RefCom, AWAS and the Malta Police Force.
38. Initiate the integration process within the Initial Reception Centre by providing, where possible, information on life in Malta, including service-providers, life-style, language and transportation. At such an early stage, material support should be provided and a case management methodology adopted.
39. All dependant family members should enjoy the same international protection status.
40. Young refugees should be supported to access or further their education.

Ministry for Justice, Culture and Local Government

41. Draw up a national culture policy that truly includes refugees as active participants.
42. Create a national 'Culture Pass' for young persons – including young refugees – to access cultural site and attend cultural events.

43. Allocate budget lines, possibly through funding programmes, to encourage artists to use culture and the arts as a tool for intercultural and interfaith dialogue.
44. Ensure that the national legal aid pool contains lawyers versed in issues relevant to refugee integration.
45. Involve refugees and refugee communities in local centres and activities.
46. Harmonise legislation, institutions and policies in relation to access to legal aid for various available remedies and publish clear information on access.

Parliamentary Secretary for Local Government and Communities

47. Grant refugees the right to vote and stand in Local Council elections.
48. Establish incentives, including funding mechanisms, for Local Councils to familiarise themselves with the refugee communities within their localities, and to support their involvement in local activities and programmes – including social and cultural events.

Ministry for the Environment, Sustainable Development and Climate Change

49. Implement programmes aimed at fostering environmental and community responsibility amongst refugees.
50. Provide opportunities for local farmers to engage with refugees experienced in farming, so as to stimulate dialogue and knowledge exchanges.
51. Explore the possibility of allocating financial resources and land for the creation of community gardens, encouraging residents to grow their own food within a communal environment.
52. Facilitate the establishment of agricultural enterprises by refugees.

Ministry for Foreign Affairs and Trade Promotion

53. When drafting/researching for submission of reports to the United Nations, such as for the Universal Periodic Review and for the core human rights treaties, include issues relating to refugee integration and protection, such as statistics, challenges, developments and concerns, inter alia by developing an inclusive dialogue with refugee communities.

Ministry for Transport, Infrastructure and Capital Projects

54. The Tallinja Concession card⁶ should be granted to all people receiving social security benefits, and newly-arrived asylum-seekers.
55. Prohibit precarious employment on large capital projects.
56. Organise public anti-racism campaigns with posters on buses and deliver zero tolerance training to all bus drivers.
57. Ease the conditions for the transfer of non-Maltese driving licenses.

Ministry for Gozo

58. Undertake research in order to explore the particular integration challenges and opportunities Gozo presents for refugee integration.
59. Establish an office that may provide administrative services to refugees living in Gozo, including for the application and renewal of documentation.

Ministry for the Family, Children's Rights and Social Solidarity

60. Social benefits eligibility should be assessed on an individual basis, and not on the basis of status.
61. Ensure the best interest of the child is respected in relation to unaccompanied minors, by guaranteeing a regular review of their care plans by the Children and Young Persons Advisory Board.
62. New social policies and laws should be assessed to ensure their due consideration for the particular needs of refugees.
63. Full-time students receiving a stipend should continue receiving the full rates of social security benefits.
64. Target refugee poverty by:
 - a. using the Minimum Essential Budgets proposed by Caritas Malta as the benchmarks to defined and quantify adequate minimum income and to guide social security policies geared at reducing the risk of deprivation;

⁶ For more information on this card see here: <https://www.publictransport.com.mt/concession>.

⁷ Proposals presented by a coalition of 17 NGOs, available here: <http://theshiftnews.com/wp-content/uploads/2018/02/A-Proposal-for-Rent-Regulation-24.02.18.pdf>.

- b. increasing the statutory minimum wage over and above the COLA (cost of living allowance) adjustment, slightly but annually, for a period of three years;
- c. adopt a principle that individuals who, despite their best efforts, are legitimately unable to access the labour market, still deserve to have a minimum level of income that would at least enable them to afford to buy the goods and services necessary for a decent living. Ensuring this requires strengthening the social security benefits for people who earn less than the Minimum Essential Budget for their household type.

Parliamentary Secretary for Social Accommodation

65. Grant access to social housing to beneficiaries of subsidiary protection.
66. Engage with the Proposal for Rent Regulation in Malta⁷ to tackle the difficulties faced by refugees in securing dignified and reasonable accommodation.
67. Grant access to the Housing Authority's schemes to refugees.

Parliamentary Secretary for Persons with Disability and Active Ageing

68. Ensure that Malta's disability policies and institutions include refugees in their frameworks and activities.
69. Ensure that Open Centres are fully accessible to persons with disabilities.
70. Explore the implications of an ageing refugee population, in terms of specific vulnerabilities, available services, entitlements and social issues.
71. Provide elderly refugees with the same rights and opportunities to access institutional care as those enjoyed by nationals.

