Submission on the National Action Plan Against Racism

Comhairle Náisiúnta na nÓg

National Youth Council of Ireland

3 Montague Street

Dublin 2

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Contents

Introduction

The National Youth Council of Ireland (NYCI) is a national organisation which represents and supports community, voluntary and not for profit youth organisations in Ireland. Founded in 1967, we currently have 56 member organisations ([www.youth.ie/members)](www.youth.ie/members) which represent the scope, scale and diversity of the youth work sector. Our member organisations work with approximately 380,000 young people aged 10 to 24 years in every community in Ireland with the support of 40,000 volunteers and 1,400 paid staff. NYCI's role is recognised in legislation (Youth Work Act) and is represented on the National Economic and Social Council and other national structures.

NYCI offers a variety of programmes and supports to the youth sector through our:

- Equality and Intercultural Programme,
- National Youth Health Programme,
- National Youth Arts Programme,
- International and Young Voices Programme,
- Development Education and Global Youth Work Programme,
- YouthPact: Cross-border/Cooperation Ireland Initiative,
- Child Protection Programme,
- STEAM in Youth Work Programme,
- Skills Summary Programme,
- Youth Policy, Advocacy, Research, Media, and Communications.

NYCI believes that a fair and just society is one where young people are valued; where there is a commitment to justice; a belief in the interdependence of lives and a sense of solidarity that comes from people acting together; a strong commitment to freedom; and a strong engagement with the ecological values of harmony and balance with nature.

The National Youth Council of Ireland welcomes the development of the National Action Plan Against Racism (NAPAR). We make this submission focusing on youth-specific issues. It is informed by our ongoing work with minority ethnic young people and the youth work sector, drawing on the many youth consultations we have done in recent years, our own research *Make Minority a Priority* on the experiences of minority ethnic young people growing up in Ireland, and engagement with our members and the wider youth sector, principally through our *Equality and Intercultural Programme*, our *Youth 2030 Global Youth Work and Development Education Programme*, and our *Young Voices initiative*.

In leading up to writing this submission we reached out to the youth sector, collaborating with the Anti-Racism Committee and DCEDIY to hold an online consultation event. We have included quotes from our consultations with young people to directly include their voices in this submission, as well as through our recommendations. The recommendations outlined below come directly from our own research, engagement with the youth sector, and the case studies and anecdotal evidence we have gathered.

Premise

NYCI's Understanding of Racism

At the outset we want to define NYCI's understanding of racism and urge that a similar one be adopted by the National Action Plan Against Racism.

NYCI support the understanding of racism used by the Anti-Racism Committee. Racism is structural, institutional, and historical, and not just an individualised experience. It is structurally embedded within our culture as a phenomenon of domination and power, which is reflected through, and reproduced by, institutions, practices, policies, and cultural norms, and through them has the effect of excluding or discriminating against individuals or groups, based on their race or ethnicity (including nationality and membership of the Traveller community). Racism is present whether the exclusion is intentional or not (UN Durban Declaration on Racism and Programme of Action).

Racism occurs in many areas of society and affects many aspects of people's lives. A focus on the root causes of racism is necessary to ensure that the NAPAR tackles the structural and institutional aspects of racism, those aspects that are harder to see but do more damage and perpetuate systems of oppression and social injustices. As an organisation, we adopt a racial justice lens to tackling racism. This approach recognises that, systemic racism manifests in ways that prevents people from enjoying their rights across many domains, including their economic, social, cultural rights, as well as their civil and political rights.

We acknowledge the intersectionality between racism and all other forms of oppression, including the oppressions experienced by people based on gender, sexuality, gender identity, disability, and socio-economic circumstances. Racism impacts groups across a range of life circumstance and all must be afforded equal protection and support in the NAPAR. It must include all residents in Ireland, including those temporarily residing in Ireland, migrant workers whether documented or undocumented, the Traveller community, the Roma community, and all those in the international protection system.

NYCI's submission relates specifically to young people's experiences of racism and the recommendations they, and the youth work sector have asked us to convey. In doing this we pay attention to the varied instances of racism experienced by young people who are:

- Black people (experiencing Afrophobia),
- Other young people of colour (POC) groups, (Anti-migrant racism),
- Muslim or other minority religion (Islamophobia or Anti-Muslim racism, Antisemitism),
- Travellers or Roma, and other minority ethnic groups (Antigypsyism or Anti-Traveller racism),
- Black, Traveller, and POC (BTPOC) young people experiencing mental health issues, those in care or social services, are disabled, involved in juvenile justice system and in prisons, having caring roles, are LGBTI+, who experience socio-economic disadvantage, who have different immigration status,
- Gender also plays a significant role in young people's experience of racism.

Demographics and statistics for the Republic of Ireland

NYCI notes that almost 1 in 7 young people (15%) aged 15-24 living in Ireland are minority ethnic, with this rising to 16% for those aged 5-14. This represents over 200 different nationalities (Central Statistics Office 2017a: EYO29). Only 7.5% of all 0–14-year-olds were born abroad (Central Statistics Office 2017a: EYO20). This demonstrates that the vast majority of minority ethnic children were born in Ireland. In addition, an increasing number of young people from a minority ethnic background also identify as having a dual nationality. In 2016, 34,761 of those aged 0-14 years old and 14,384 of those aged 15-24 identify as having dual nationality with one of these being Irish.

Of the national population of young people at least 6.7% come from backgrounds who experience racism (CSO 2017a: EYO29):

- 1.2% are Travellers,

- 2.9% are Black or Black-Irish,

- 2.6% are Asian or Asian-Irish.

Figures for young people from Arab or Muslim backgrounds who also experience racism are not included in these figures.

In a recent Red C Poll that NYCI carried out (April 2021), it became clear that 18–24-year-olds are more likely than other age groups to see racial discrimination as an important issue:

- 79% of those aged 18 – 24 stated that racism is a significant issue online (compared with 69% on average).

- 77% of those aged 18 – 24 stated that Ireland needs a National Action Plan Against Racism (compared with 66% on average),

- 80% of those aged 18 – 24 recognised that racism is having a negative impact on Irish society (compared with 63% on average),

- However, 64% of those aged 18 – 24 also believe that racism is more significant in other countries which may have the effect of negating the serious impact it has on racialised groups in Ireland.

Moreover, only 44% of those aged 18 – 24 stated that racism is an issue in the area they live; this compares to 21% in the general population. It is hard to know what this low figure means but it corresponds with evidence from NYCI's other research work that has consistently shown that people do not see racism that is not overt or experienced at an individual level. Many young people complain that when they report racism in school or to Gardai their experience is dismissed as being 'not racist'. In addition, people do not see the pervasive nature of racism in structural and institutional forms or within their own unconscious bias. However, the much higher statistic in young people's answers suggests a greater awareness and understanding of racism amongst younger people and the figure of 80% of those aged 18 – 24 who recognise the negative impact it has on society also shows increased awareness.

Our submission addresses the key questions and concerns raised as part of the consultation process to date. We address the issue from young people's perspective and have included some quotes from young people.

The Youth Work Sector

What is the youth work sector?

Youth work has been enhancing the lives of young people and adults in Ireland for more than 100 years. It was given formal statutory recognition in the [Youth Work Act 2001 - National Youth Council of Ireland](#), which defines youth work as:

> *"A planned programme of education designed for the purpose of aiding and enhancing the personal and social development of young people through their voluntary involvement, and which is complementary to their formal, academic or vocational education and training and provided primarily by voluntary youth work organisations."*

Who are the stakeholders in the youth work sector?

The youth work community in Ireland includes young people, youth workers and youth leaders, youth work managers, youth organisations, volunteers, trainers, researchers, educators of youth workers, Education Training Board Youth Work Officers, further education and Third Level institutions, Youth Justice, boards of management, local communities, National Agencies for Erasmus+ Youth and the European Solidarity Corps, youth work partners, funders, and policy makers at all levels of governance.

The youth work sector also interfaces with Children and Young People's Services Committees, Family Resource Centres, and social inclusion officers in local government structures including Partnerships.

NYCI's Key Recommendations in Brief

Recommendation 1: Recognise and fund the unique role of youth work as an effective route in tackling racism.

Recommendation 2: Recognise that young people are a particular cohort at risk from the negative effects of racism, especially in relation to their sense of identity and belonging. Young people should be named in all aspects of the NAPAR so that they are never overlooked.

Recommendation 3: Implementation is key with strong political leadership:

This new National Action Plan Against Racism for Ireland **needs to be fully costed and funded, be cross departmental and cross-sectoral, be long-term in scope, have clear timelines, concrete objectives, and measurable outcomes**. Lessons must be learned from the previous NAPAR which was a strong document but was poorly resourced with few actions implemented. This NAPAR for Ireland should be based centrally at the highest level within the Department of An Taoiseach and involve all government departments to steer, implement, monitor, and report on the plan.

A new **National Consultative Committee on Racism and Interculturalism** must be in place to support coordination, implementation and monitoring of the National Action Plan. The Committee must have representation from the youth work sector alongside other key stakeholders.

We need a *Minority Ethnic Youth Action Plan* **implemented by DCEDIY and other relevant departments and key stakeholders.**

Recommendation 4: Data collection must be disaggregated by ethnicity, religion and age to measure gaps and trajectories of success. Collation of comprehensive and consistent data on the reporting of racism and discrimination by civil and statutory bodies is critical. Without data we cannot systematically measure discrimination or changes over time to better target responses, resourcing, and support that young people need.

Recommendation 5: Increase diversity amongst staff and volunteers at all levels in public bodies, institutions, NGOs, educational settings, business, healthcare, politics, and civil society. This long-term goal needs to be ambitious. It involves delivery across a range of institutions and to be named in all relevant strategies/policies - including within the youth work sector - to make this a reality.

- Key to ensuring responsive, diverse and inclusive workplaces, that are welcoming and supportive of ethnically diverse colleagues, it is critical that there is leadership, awareness–raising and understanding, and that workplaces are held to account.

Recommendation 6: There is a need to implement long-term plans to address the under-employment of minority ethnic communities and take seriously the admission and retention of minority ethnic young people in mainstream employment. This involves both measures to make the workforce more inclusive and measures to penalise discrimination.

Recommendation 7: On education there is a need for:

- The integration of anti-racism education into the National Action Plan Against Racism is a key priority. Engagement with the Irish public is essential, through formal, non-formal. informal and life-long learning opportunities, so all can acquire the knowledge and skills

needed to eliminate racial discrimination and take the action needed to confront and end racism.

- We call for a forum of interests/ cross-departmental approach involving Departments of Children, Equality, Disability, Integration and Youth, the Department of Foreign Affairs/Irish Aid, the Department of Education, the Department of Justice, Department of Social Protection and Department of Further and Higher Education, Research, Innovation and Science to work collaboratively with all education partners, adopting a cross-sectoral approach to eliminating racism and racial discrimination in education.

Recommendation 8: On Access to Justice there is a need to:

1) Ensure greater transparency in policing and increased diversity awareness,

2) Extend the nine grounds to include socio-economic status,

3) Ensure the safety and regularisation of undocumented people,

4) Address concerns for young people in the International Protection System.

Recommendation 9: Tackle hate speech, online racist content, white supremacy, and the far-right through sanctions, collaborate with the far-right observatory, build trust, fund education and awareness-raising.

Recommendation 10: Uphold and reinforce rights to accommodation, including the right to live in accommodation where occupants can live free and protected from racist incidents

Recommendation 11: Ensure that measures are taken to create mainstream health and mental health services that are staffed by people who have cultural and religious competencies to meet the needs of minority ethnic young people, including Travellers.

Recommendation 12: Resource youth arts programmes which enable young people from minority ethnic backgrounds to participate in the arts, including in arts experiences which are led by practitioners/artists from their own communities or in programmes which draw on the arts practice of their own cultural identities.

Resource and support young minority ethnic artists into career development and progression.

Recommendation 13: Create safer spaces and opportunities for the lived experience of young people to inform policy and practice.

Recommendation 14: Initiatives to improve access to services for minority ethnic young people include: developing a code of practice for services and businesses; delivering cultural competence and awareness raising education; applying Public Sector Duty reform; developing forms of redress when rights are withheld or compromised.

Key Issues and Recommendations in Detail

1. On the role of youth work in tackling racism

Recommendation: Recognise and fund the unique role of youth work as an effective route in tackling racism.

- The youth work sector has a key role to play in bringing about and enacting societal and cultural change and must be held accountable and supported to do this. The inclusion of young people from minority ethnic communities needs to be sustained as a conscious and purposive part of youth work. Youth workers need ongoing support to develop specific competencies in inclusive, diverse and responsive practice in order to address this need[1],

- Youth work responses must be led by what the young people need to feel safe and included. The current situation is impacted by structural barriers in the mainstream youth sector. There is a need for greater choice in how young people and youth leaders from minority ethnic backgrounds participate. This may mean:

  o Establishing minority ethnic and/or gender-specific groups[2],

  o Funding support to facilitate minority ethnic-led organisations to apply for resources to deliver youth services in their own right or in partnership with others,

  o Challenging a traditional preference for only engaging with young people from minority ethnic communities in integrated youth groups,

  o Spaces may need to serve as drop-in or fluid spaces where project work can evolve based on the young people's interests,

  o Youth spaces need to promote dialogue and empowerment, where youth work methodologies are grounding principles,

- NYCI is committed to bringing about and enacting societal and cultural change through its Equality and Intercultural Programme. It has identified a need for funding to employ four outreach regional officers to work under the Programme; our current reach is limited with just 1.5 staff. NYCI proposes to build and coordinate a group of Champions across the youth work sector to support inclusion,

- Develop and resource an Intercultural Strategy for Youth Work[3],.

- A global youth work[4] approach runs in conjunction with intercultural and anti-racism work and needs resourcing. Strengthening the youth sector's relationship with global citizenship,

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[1] 8 Steps to Inclusive Youth Work (NYCI, 2021).
[2] How do I get the Balance in My Head (Canal Communities Regional Youth Service, 2017) and Make Minority a Priority (NYCI, 2017).
[3] National Youth Council of Ireland (2008) A Report and Recommendation for an Intercultural Strategy in Youth Work, Dublin: NYCI unpublished report.
[4] A global youth work approach supports young people and youth workers to see themselves as global citizens with a role in addressing inequality and being part of transformative action, both locally and globally.

sustainability, democracy and human rights, and a critical development education approach, provides a key opportunity to build capacity of youth workers and young people to develop active global citizenship and see diversity as a resource and strength[5],

- Resources need to be allocated at national, regional and local levels to strategically fund dedicated youth workers and inclusion workers to support intercultural and anti-racist youth work especially those directly running minority ethnic youth groups. Resources include youth work and community facilities that would be made available to self-organising minority-ethnic youth groups for free or minimum cost,

- The youth work sector needs to be resourced to explore ways of replicating and adapting successful approaches spearheaded by existing intercultural and anti-racist youth work. NYCI is introducing Racial Justice training in the youth work sector with the aim of building competencies around racism and diversity to better equip youth organisations to support inclusive, diverse and responsive practice in youth work,

- In addition, NYCI has been leading out on a Transformative Practice project that works to transform hate in youth settings by introducing tools that bring about real and lasting change, by working with young people that perpetrate hate,

- The youth work sector should be supported to deliver CPD training in medium to long term projects with the view to creating whole organisational approaches to tackling racism (including boards, CEOs, regional managers, staff, volunteers, and students),

- In provisioning the education of the youth work and formal education sectors, education about racism and anti-racism must be included and aligned with delivery of quality, life-long learning and critical development education.

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[5] This should include youth work training and activities and awareness-raising in human rights, sustainable development and good governance – and to support young people's active engagement in responding to global challenges and efforts to build democratic, peaceful, inclusive, equitable, tolerant, secure and sustainable societies across the world. (Youth in external action - Council conclusions, June 5th 2020

2. Young people as a distinct and important cohort impacted by racism

> *"Why are they treating me like this? What did I do wrong? Is there something wrong with me?' Should I try to change myself?"*[6] *"You're like scared to like show people who you are because you're afraid that they're going to like judge you from where you came from, and how you act. So you're just like scared of really being yourself."*[7]

Recommendation: Recognise that young people are a particular cohort at risk from the negative effects of racism, especially in relation to their sense of identity, belonging, and emotional well-being. Young people should be named and included in all aspects of the NAPAR so that they are never overlooked.

- Young people need support in exploring their identity, to be listened to, heard and involved. Identity formation and engendering a sense of belonging for young people who were born in Ireland or who arrived here as children and feel an affinity with more than one cultural identity is critical[8],

- Young people need safer and supported places in which they can share, deliberate and debate with others who have similar experiences[9]. In negotiating a sense of belonging minority ethnic young people in Ireland are significantly impacted by the attitude of people around them as they navigate their own journeys of self-understanding and discovery,

- Young people need to have opportunities to talk about the things they hear so that it is not internalised – from comments that make them feel different, or that they don't belong, or that insult them. They need to have opportunities to critically reflect on the nature of racism and exclusion, to name it and identify and develop their coping strategies,

- Young people need robust racist reporting processes to ensure that when reporting racism, there is an experience of accountability and that their experience is being used to inform policy responses. Since the Black Lives Matter movement emerged, an 'acceptance' of racism is no longer present for young people and the desire to make a difference is being strongly voiced. (Previously, in NYCI research and consultations, racism had been expressed as a 'normal' feature of young people's lives),

- Young people need to experience appropriate responses from authorities e.g., teachers and Gardaí - in particular an acknowledgement of their reported experiences of racism. Specific targeted training for ensuring accountability needs to be implemented as part of standard CPD training in education and within policing,

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[6] Mahon, E. Be Heard on CERD. NYCI Consultation Report (2019). Unpublished.
[7] Make Minority a Priority (NYCI, 2017).
[8] One of the six transformation goals of the National Policy Framework for children and Young People, *Better Outcomes, Brighter Futures*, is 'Listen to and Involve Children and Young People'.
[9] Make Minority a Priority (NYCI, 2017).

- Where minority ethnic people have significant advocacy and support needs in relation to visas/migration status, access to college etc., it is important that they have advocacy and mentoring to understand and address these issues. These issues differ significantly for young people versus adult populations.

3. Process and implementation

> "Just be realistic here, because this actually does happen, I'm seen as a n…r, seen as a monkey. [...] we get called these names. That even if it's not on a daily basis, at least once a week. I'm just saying this actually does go on and you're not taking it seriously."[10]

Recommendation: **Implementation and strong political leadership is central**: **This new National Action Plan Against Racism for Ireland needs to be fully costed and funded, be cross departmental, cross-sectoral and long-term in scope, as well as have clear timelines, concrete objectives, and measurable outcomes.**

- The NAPAR should take a long-term approach recognising that many interventions will take a generation to bring about real change. The NAPAR should have clear goals and a realisable implementation plan. Regular evaluations and reviews will be essential. Good NAPARs place a focus on tackling structural and institutional racism, precisely because it is particularly enduring, in part because it has historically been hardest to identify and tackle,
- **A new National Consultative Committee on Racism and Interculturalism must be in place to support coordination, implementation, and monitoring of the National Action Plan,**
- NYCI believes there are critical elements inherent in a developing an effective and visionary National Action Plan Against Racism. These include:
  - Leadership, especially political leadership; Joined up thinking across all state functions; all Government Departments, National authorities and local authorities,
  - **It should have oversight and steering through the Department of An Taoiseach,**
  - Local initiatives supported from village/townland to county level, including local authorities; local and regional youth services; engagement and involvement with civil society; engagement, involvement and buy-in for/from affected communities,
  - Linking the NAPAR to other government agendas, strategies, and policies including future ones.
- The current review and any new policy focus of Better Outcomes Brighter Futures and the National Youth Strategy should facilitate the provision and delivery of additional and enhanced support for young people from minority ethnic backgrounds,
- We call for a *Minority Ethnic Youth Action Plan* implemented by DCEDIY (in partnership with other relevant departments and key stakeholders) that includes:

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[10] Make Minority a Priority (NYCI, 2017).

- o A responsive youth sector that operates from a youth strengths approach,
- o Culturally relevant mentorship programmes for minority ethnic young people,
- o Support for wellness and healthy life choices,
- o A focus on cultural identity as a key aspect of a young person's sense of self-conception and belonging,
- o Support around access to higher education and skills development,
- o A network to build community capacity and collaboration for systemic change,
- o Cross sectoral collaboration.

4. Data collection, inclusion and equitable outcomes

Recommendation: **Data collection must be disaggregated by ethnicity, religion, and age to measure gaps and trajectories of success. Collation of comprehensive and consistent data on the reporting of racism and discrimination by civil and statutory bodies is critical. Without data we cannot systematically measure discrimination or changes over time to better target responses, resourcing, and support that young people need.**

- Data collection must be consistent across all state bodies and in line with CSO descriptors. Without data we cannot measure the success of any measures taken and the impact of these for young people. In addition, we need such data to interrogate the State on equality in Ireland. We call for:
  - o The roll out of the universal ethnic identifier across all health, education, policing, social and public services to determine and plan services for those most in need,
  - o Tracking of minority ethnic young people in socio-economic and employment trajectories, including the Labour Force Survey and the Survey of Income and Living Conditions,
  - o Alternative measures such as ethnicity or parents' country of birth to be included in social surveys, as well as a broader reflection on whose outcomes are being measured[11]. This ensures that increasing numbers of naturalised citizens are not excluded when measuring integration outcomes solely on the basis of nationality,
- Revise data collection models based on understanding the lived realities of minority ethnic communities in mixed income areas. The Pobal HP Deprivation Index, used by government departments and other agencies to determine required funding levels, does not accurately determine the needs of minority ethnic families as it relies on educational attainment as a determinant of income. However, many minority ethnic adults are well-educated, but they are not in correspondingly high-paying employment due to underemployment. The Pobal HP

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[11] ESRI. (2018). Monitoring Report on Integration. Dublin: Department of Justice and Equality & ESRI.

Deprivation Index is an example of a model that, along with institutional racism that is a factor in underemployment, exacerbates the socio-economic inequalities that prevail [12],

- Data collection on various aspects of racism and discrimination, such as equality data collection, attitude and experience surveys, hate crime and hate speech statistics is crucial for monitoring and targeting policies and practices relating to hate crime and policing, to monitor patterns of discrimination, and to better target funding and resources,

- As identified by the ESRI[13], immigrant or ethnic minority boost samples would support measuring poverty and deprivation and would allow analysts to distinguish more policy relevant groups,

- Develop a research response to advise on areas for research within the youth sector to establish a clear evidence base on racism and discrimination to inform policy, and enhance delivery and practice:

  - Fund third level youth work research,

  - Develop a learning network for youth work researchers,

  - Adopt a longitudinal and participatory approach,

  - Engage the Irish Research Council to develop a research funding stream for Youth Work that addresses racism through intercultural, anti-racist and Global Youth Work.

5. Culturally informed institutional change and the need for diversity amongst staff and volunteers in our services, including youth services

A key block for minority ethnic young people not engaging in available services is the lack of ethnic diversity across staff and volunteers. This is of particular concern in our own youth work sector as well as across other state and state funded institutions.

"You have to see it to be it"[14]

Recommendation: Increase diversity amongst staff and volunteers at all levels in public bodies, institutions, NGOs, educational settings, business, healthcare, politics, and civil society. This long-term goal needs to be ambitious. It involves delivery across a range of institutions and to be

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[12] Email received from the manager of ARD FRC, Doughiska, Galway (9th July 2021).
[13] ESRI. (2018). Monitoring Report on Integration. Dublin: Department of Justice and Equality & ESRI.
[14] This is a phrase articulated by young people on the need for role models in all areas of their lives.

named in all relevant strategies/policies - including within the youth work sector - to make this a reality.

Key to ensuring responsive, diverse and inclusive workplaces, that are welcoming and supportive of ethnically diverse colleagues, it is critical that there is leadership, awareness–raising and understanding, and that workplaces are held to account.

To create the conditions that support diversity in the workforce it is important to ensure:

- Communication of key messages that signal zero tolerance for racism as a core aspect of leadership,

- Cultural competencies are required across all government bodies, government agencies, government structures, and government funded organisations and programmes. This should be done through a dedicated policy and practice approach including staff training, policy coherence, recruitment, communications, and media training/engagement, and putting appropriate and timely strategies in place. This is in addition to implementing the Public Sector Duty,

- The Public Sector Duty must be implemented across all state and state-funded services[15],

- Bring an explicit focus to understanding and adapting to diverse representations of Irish identity, including dual-identity by giving space to discussions and dialogue on the changing understanding of Irish identity and the need to accept and embrace difference as a norm.

- Shift beyond the language of equal opportunities to replace it with an understanding that structural change and intentional strategies are needed. Equality of outcome needs to be prioritised over equality of opportunity.

To increase diversity in our workforce we must:

- Develop a recruitment programme that works with schools and youth services to signpost minority ethnic young people to potential careers in youth work and education,

- Work with the Public Appointments Service (PAS) to develop initiatives to increase ethnic diversity in government bodies where ethnic diversity is underrepresented in the workforce.

- Set new targets with PAS to increase workforce diversity that matches the ethnic diversity in the community with a focus on those under-represented in the workforce.

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[15] 'Implementation of the Duty can assist an organisation to define, and give expression to, equality and human rights values related to its purpose, and to key public sector values. Explicit equality and human rights values, such as non-discrimination or dignity for service users, can motivate and guide public bodies to assess and address equality and human rights issues relevant to their functions.' (IHREC, 2019).

6. Employment

> *'I'd be on the phone … talking to someone who hasn't seen me, for a job interview or something... And they'd think I'm White… or I'm Irish. Then I'd go to the job interview and they're like "Eh hi!" [in a very shocked voice]'*[16]

Recommendation: **Address under-employment of minority ethnic communities and the admission and retention of minority ethnic young people in mainstream employment, including Travellers. This involves both measures to make the workforce more inclusive and measures to penalise discrimination.**[17]

- Increase opportunities for under-represented minority ethnic young people and specifically ensure that they have the experience, credentials and networks to compete for available jobs in order to eliminate systemic racism and race-based disparities,
- Develop responsive in-school guidance to ensure that young people and their parents can make informed choices on options for life and career progression. This should also be supported by industry-led career initiatives for training, support and work placement and mentoring opportunities to help minority ethnic youth secure high-quality employment and advance their careers, including in the interactive digital media industry which has a significant presence in Ireland,
- Promote *Investing in Diversity* models to engage industry led career initiatives[18] in challenging systemic, race-based disparities,
- Support post-secondary education, and alternative education paths along with career development plans that are responsive to minority ethnic young people's needs.
- Implement the following measures:
  - Re-introduce successful targeted training programmes aimed at Traveller and Roma communities which were cut due to austerity and have not yet been re-introduced,
  - Support apprenticeships and Traveller specific economies for entrepreneurship,
  - Address discrimination at work and ensure that accountability mechanisms are enforced across private and public sector contexts,
  - Include measures of respondents' ethnicity and age to both the Labour Force Survey and the Survey of Income and Living Conditions to support better understanding of differences in employment in Ireland amongst groups and inform policies,
  - Implement effective and prompt recognition of skills and qualifications acquired abroad.

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[16] Make Minority a Priority (NYCI, 2017).

[17] INAR. (2019). Alternative Report on Racial Discrimination in Ireland: Collective Civil Society Perspective. Dublin: INAR.

[18] Internationally, there is evidence of the impact of work-based learning and education/ enterprise partnerships. (Dept of Education and Skills, 2016). Industry Led Career Initiatives elsewhere show that involving industry in tailored projects can support young people with meaningful outcomes and challenge structural inequality. (Post-secondary education and career development: Black Youth Action Plan, Ontario).

7. Education

'I actually had a bad experience with a teacher from secondary school … From 1st year to 3rd year I had great teachers, so I moved into transition year. And we had to change into [wearing] white t-shirts. And there was my geography teacher who said, "we shouldn't have been given a white t-shirt at all because it will get stained". And I was like "what do you mean by that?" and then he was like "you know exactly what I mean". I actually left the school, I moved to a different school for the last two years'[19]

Recommendation: **The integration of anti-racism education into the National Action Plan Against Racism is a key priority. Engagement with the Irish public is essential, through formal, non-formal. informal and life-long learning opportunities, so all can acquire the knowledge and skills needed to eliminate racial discrimination and take the action needed to confront and end racism.**

We call for a forum of interests/ cross-departmental approach involving Departments of Children, Equality, Disability, Integration and Youth, the Department of Foreign Affairs/Irish Aid, the Department of Education, the Department of Justice, Department of Social Protection and Department of Further and Higher Education, Research, Innovation and Science to work collaboratively with all education partners, adopting a cross-sectoral approach to eliminating racism and racial discrimination in education.

Strategy and Policy issues that need to be addressed include:

- o Curricular reform – long-term reform with interim solutions are needed to avoid another generation falling through the gap. Interim solutions include provision of extracurricular interventions and visiting expertise in the short term plus CPD for education staff as a priority,

- o Tackle racism in schools through anti-racism training for teachers and school staff,

- o End reduced hours in schools for Travellers, and young people in international protection system. This is an issue across the school system,

- o Increase language support for speakers of English as a second language - including parents,

- o Set up a social capital/mentoring programme to support minority ethnic young people disconnected from social networks (for TY placements, applications to post school opportunities, form filling, navigating systems etc.),

- o 'PATH' - Programme for Access to Higher Educatio**n** - funding streams include Travellers in further education but does not include migrants. If PATH is continuing, then additional funding with a widening of focus to include migrants is required,

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[19] Make Minority a Priority (NYCI, 2017).

- o Reduction in third level fees for young people in Ireland who are unnecessarily viewed as international students and have completed three years of secondary education in Ireland.

- Recognition of the Sustainable Development Goals Framework to 2030 is required in the new NAPAR particularly the role of SDG 4.7:

  - o *"By 2030 ensure all learners acquire knowledge and skills needed to promote sustainable development, including among others through education for ... human rights, gender equality, promotion of a culture of peace and non-violence, global citizenship, and appreciation of cultural diversity and of culture's contribution"*[20],

  - o Review post primary languages with the view to creating curriculum specifications for dominant African languages – similar to what is in place for over 15 other languages. If we look at this through the lens of SDG 4.7 – diversity, racism and the SDGs – language is a significant part of cultural identity and can support a sense of belonging.

- Greater investment in a justice and rights perspective is required with a focus on global inequalities,

- The most recent Intercultural Education Strategy (DES, 2010) and the Intercultural Education guidelines for primary and post primary schools (NCCA, 2005) require urgent revisions and updating, to include a conceptual framework that can support school leadership and staff in tackling and mitigating against racism. The NCCA has made some progress in building awareness of and shaping responses to racism experienced by the Traveller community (NCCA, 2017). The national curriculum needs to deepen and extend this work to all aspects of racism experienced by minority ethnic communities,

- The current bullying policies and procedures conflate racism with bullying. The school system needs to develop processes for responding to and addressing racism, including against schools themselves, in which racism is understood as violence (often as micro-aggressions) and is responded to with zero-tolerance,

- Schools need designated anti-racism and intercultural resources. Initiatives exist to provide this support, including the Yellow Flag Programme that supports primary and secondary schools to be more inclusive, celebrate diversity and challenge racism. But these initiatives need core funding to grow and make the necessary impact,

- Include all levels of the education system in the implementation plan to include funding for training and curriculum support,

- A framework should be designed by the Department of Education to help schools create spaces for peer reflection and self-evaluation. An example of this in the UK National Education Union's Framework for Developing an Anti-Racist Approach[21][OBJ]

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[20] Transforming Our World: The 2030 Agenda for Sustainable Development, UN (2015).
[21] Framework for Developing an Anti-Racist Approach, National Education Union (UK).

- Resource the NCCA to include a focus on the history and culture of minority ethnic groups in Ireland and create a new Education Officer post to build understanding of the diversity in Irish society with the view to developing curricular reform,

- Curricular and policy reform should include education at all levels and ages about racism and black history to include topics on social and political life, migration, belonging and experiences under colonialism.

- Decolonise the curriculum by applying a global and racial justice approach, including discussing and challenging portrayals of poverty and inequality in schools. In support of decolonising the curriculum, we must not just diversify curricula[22]. A decolonised curriculum would bring questions of intersectionality and specifically, class, caste, race, gender, ability and sexuality into dialogue with each other,

- Expand the National Plan for Equity of Access to Higher Education and develop a National Traveller Education Strategy, including a plan to improve access to Higher Education for members of the Traveller and Roma Communities.

A forum of interests/ cross-departmental approach would include:

- The State, together with its educational partners must develop a programme for training and resourcing across the education system - teachers and school management, third and further education institutions, communities, youth workers and volunteers, to plan for and implement anti-racist and intercultural education and ethos in schools and in the community and, particularly, to assist schools to meet their Public Sector duty and Equality and Human Rights obligations,

- Teachers and other educators must have the knowledge, skills, and confidence to tackle issues of racism in the school community and in their classroom/playground,

- A fully funded implementation plan is required for the new Teaching Council *Ceim standards* in teacher education for all universities,

- Global Citizenship Education and Intercultural and anti-racism education must be prioritised in the whole career of a teacher and particularly those who are keeping up their registration as a teacher. This can be done through the Teaching Council who have responsibility for the 'Teacher Career' from Initial Teacher education (*Droichead*) through to Continuous Professional Development (*Cosan*),

- Increased cultural competency awareness for Guidance Counsellors should be a priority,

- A whole community approach to tackling racism and improving intercultural engagement is necessary and a method of culturally appropriate engagement with parents should be adopted and rolled out to ensure the needs and cultural differences are considered when addressing issues and opportunities,

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[22] Education is a keyway to impose hegemonic order i.e., a term for how the state and ruling classes have historically instilled values that are gradually accepted as 'common sense', what is considered 'normal'. Hegemony is important to understand because it informs how ideas are adopted, carried, and maintained. The Purpose of Power (Garva, 2019).

- Greater diversity is necessary in teacher education – 'see it to be it'. Existing funding streams should be enhanced for projects in universities to encourage greater diversity in staffing and in student engagement. Grants/incentives for minority ethnic people to study teaching (pre-primary, primary, secondary, further education, third level),

- The Teaching Council should provide supports and recognise the teacher qualifications from other jurisdictions, including refugees who have arrived in Ireland without documentary evidence of qualifications. The Teaching Council needs to engage with this as a priority issue,

- Coordination is needed to develop Global Citizenship Education about racism between key policies, including the forthcoming Irish Aid Strategy on Development and Global Citizenship Education, and the Department of Education/ Department of Education and Department of Further and Higher Education, Research, Innovation and Science strategy on Education for Sustainable Development, the National Youth Strategy, the Further Education and Training Strategy, and the National Volunteering Strategy (2021 – 2025), and the forthcoming Better Outcomes Brighter Futures,

- Carry out analysis of fundraising in Ireland by International NGDOs to ensure their fundraising methods do not undermine their commitment to challenge, prevent and end racist attitudes, acts, and incidences, especially those impacting directly on minority ethnic young people in school settings. A recognition of the importance of a racial justice approach[23] should feature strongly in the new *Dóchas Code of Conduct for Images and Messag*es with greater policy coherence for Global Citizenship Education and Development Education.

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[23] Racial justice—or racial equity—goes beyond "anti-racism": It is not just the absence of discrimination and inequities, but also the presence of deliberate systems and supports to achieve and sustain racial equity through proactive and preventative measures. Racial Justice [is defined] as the proactive reinforcement of policies, practices, attitudes and actions that produce equitable power, access, opportunities, treatment, impacts and outcomes for all. (RaceForward.org).

8. Access to justice

> *"I've been pulled over so many bloody times. And they just start searching you. I can't count the number of times me and [my mate who is black] have been pulled over by the guards for no bloody reason whatsoever."[24]*

Recommendation: On access to justice:

Firstly, ensure greater transparency in policing and increased diversity awareness including:

- Transparency in how the Gardaí conduct enquiries with a racial bias bearing,

- Address shortcomings identified in the professional development and training practices in An Garda Síochána in line with **2018 report of the Commission on the Future of Policing,**

- Draw up the Code of Practice accompanying the newly published Garda Síochána (Powers) Bill without delay,

- Deliver on its promise that the gender, age, ethnicity and location of the person stopped be recorded along with details of documents that were requested, questions asked and any searches that were carried out. The lack of data on the ethnic composition of young people in such circumstances has already been identified as an issue within An Garda Síochána.

Secondly, extend the nine grounds to include socio-economic status.

- To support meaningful and sustained progress in the fight against racism, education and other initiatives the nine grounds prohibiting discrimination should be extended to include socio-economic status without delay. This would give greater recognition of the multiple forms of discrimination that many minorities ethnic groups face.

Thirdly, ensure safety and regularisation of undocumented people.

- There needs to be a racism reporting process to Gardaí that undocumented people can feel safe to use where they know they won't risk fear of deportation for coming forward when they feel a crime has been committed against them,

- NYCI seeks continued commitment to the current Programme for Government's promise to create new pathways for long-term undocumented people and their dependents to regularise their status – particularly to see children and young people as rights holders, and not solely as dependents. We urge consideration of the submission by the Ombudsman for Children's Office on the Draft Scheme to Regularise Undocumented Migrants (2021),

- Reduce the cost of regularisation and citizenship application costs for young people who are applying.

Lastly, address concerns for young people in the International Protection System.

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[24] Quote from a young white male from Make Minority a Priority (NYCI, 2017).

- Reduce the waiting time for people in the International Protection system for decisions on their applications and appeals,

- We welcome the forthcoming overhaul of the direct provision accommodation system, but urge that in the interim the following is put in place and continues as long as necessary:
    - Move families with children and young people out of unsuitable accommodation, including emergency accommodation,
    - Employ suitable interpretation services so that young people are not asked to translate sensitive or inappropriate information,
    - Ensure Children First guidelines are adhered to; including vetting for all staff, and reporting issues to statutory agencies,
    - Ensure that misinformation or misleading information that create unnecessary fears in relation to child protection is not shared with parents,
    - Establish safe spaces to address fears, concerns and complaints to mitigate against residents' reluctance to complain in fear that highlighting issues may impact on their status or their treatment while seeking asylum in Ireland[25],
    - Ensure cultural sensitivity training, as well as training in gender, equality, human and children's rights training for all staff working in Direct Provision centres.

- **Ensure priorities for the new system to replace the direct provision system, including:**
    - A non-profit model; ending the use of emergency accommodation; carrying out vulnerability assessments; putting integration supports in place,
    - Address any discrimination against young people in the International Protection system,
    - Ensure independent oversight and inspection of all new systems.

- **On unaccompanied children:**
    - Provide guidance in relation to applications for residence status whilst in Tusla care and as early as possible,
    - Respect the difficulties children face when transitioning from the care of Tusla on turning 18 years of age where a decision has not been made on their immigration status,
    - Unaccompanied children should be provided with the same standard of aftercare planning and supports as other children leaving care.

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[25] Safety and Welfare of Children in Direct Provision, (OCO 2021).

9. Hate speech and the rise of the far-right

Recommendation: **Tackle hate speech, online racist content, white supremacy and address the far-right through sanctions, collaborate with the Far-Right Observatory, build trust, fund education and awareness-raising.**

- Apply sanctions on social media companies, and users, who allow or share racist content, to counteract the endemic online racism and the hate speech that young people encounter,

- Inform young people of the instruments at work to tackle hate speech, especially online hate speech, to lessen their feelings of isolation when under attack. Communicate and build trust with initiatives to counter hate, both online and offline

- Fund the youth sector to roll out NYCI's transformative anti-racist practice – Transforming Hate in Youth Settings – which upskills youth workers working with young people perpetrating racism to bring about real and lasting change.

- Address the far-right through the following initiatives:

    o Resource An Garda Siochana and the Department of Justice to work in collaboration with the Far-Right Observatory to tackle organised far-right activism,

    o Educate educators on the grooming of young people into far-right ideologies and how to counteract it,
    o Fund the youth sector to offer alternative spaces of connection and belonging for young people vulnerable to extremist political grooming.

10.   Accommodation

Recommendation: **Uphold and reinforce rights to accommodation, including the right to live in accommodation where occupants can live free and protected from racist incidents.**

- Bolster the infrastructure to stop prejudice in the private rental market and actively sanction prejudice where it happens. Ensure that private landlords must take HAP,

- In the event of a racist incident toward minority ethnic families living in local authority housing ensure intervention that is timely and appropriate with relocation as an option,

- Work with an equity lens to tackle the high rate of homeless Travellers[26], Roma and other minority ethnic families,

- Address the rights of minority ethnic young people in care, by implementing the recommendations under the Health Information and Quality Authority [27], including:

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[26] Young Travellers represent 11% of homeless young people but only 1.2% of the population
[27] Foster Care, HIQA, Cork.

- o Children's assessments must sufficiently explore the identity and care needs of children from diverse cultural backgrounds and adequately consider this within the fostering matching process,

  - o Complete the required diversity/cultural competency training to all care staff without delay.

- Uphold and reinforce Traveller rights to accommodation, this includes:

  - o Sanctions for local authorities who do not provide accommodation under the county plan and budget allocation,

  - o Providing sanitation services and clean water supplies to Travellers in halting sites,

  - o Accessible play areas for children,

  - o A promise and long-term plan to reverse over-crowding on halting sites and future-proofing Traveller needs.

11.   Health, including mental health

> *Young people speaking about the impact of racism:*
>
> *"It makes us feel sad and lonely."; "They call me monkey, tell me to go back to my country,*
>
> *they hate me. I want to feel safe."; "I lose confidence."; "We are not treated the same – so it*
>
> *makes you feel different"*

Recommendation: **Ensure that measures are taken to create mainstream health and mental health services that are staffed by people who have cultural and religious competencies to meet the needs of minority ethnic young people, including Travellers.**

- Ensure staff and practitioners understand the centrality of cultural identity in a young person's care. Young people from minority ethnic backgrounds usually feel an affinity with more than one national or cultural identity which can be an additional stressor[28],

  - o Build ethnic diversity amongst health staff and practitioners,

  - o Deliver intercultural awareness training to all health staff and practitioners,

  - o Co-design health and mental services in consultation with minority ethnic young people,

  - o Reform the 27th amendment to the constitution on citizenship.

- Ensure that health, mental health and social services practitioners understand and adopt trauma informed responses through ongoing CPD training,

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[28] How so I get the Balance in my Head? (Mc Crea and Mc Mahon, 2017).

- Develop and roll out a national targeted suicide prevention campaign in relation to young Travellers and other minority ethnic young people that is supported by research that establishes a clear evidence base,[29]

- Ensure that the Government follow through with its recent commitment to publish a Traveller and Roma Mental Health Action Plan with a dedicated budget and supported by a Traveller advisory group, paying attention to the distinct needs of young Travellers vulnerable to suicide, including LGBTI+ Travellers.

12.   Accessing the Arts

Recommendation: **Resource youth arts programmes which enable young people from minority ethnic backgrounds to participate in the arts, including in arts experiences which are led by practitioners/artists from their own communities or in programmes which draw on the arts practice of their own cultural identities.**

Resource and support young minority ethnic artists into career development and progression.

- Ensure access to career guidance, counselling and/or mentorship opportunities to support young artists from minority ethnic backgrounds to explore their interests and build upon their strengths, as well as identify their options in terms of training, funding, employment and career progression,

- Create targeted bursary schemes for young artists from minority ethnic backgrounds to address existing disparities between their economic conditions and those of other emerging artists. This positive action would support minority ethnic artists to transition through training, apprenticeship/mentoring programmes and unpaid early career opportunities and support more equitable progression routes for emerging artists of all backgrounds,

- Funding and arts bodies to prioritise alternate types of expression such as video-based applications etc. to diversify the portfolio of applications received, subsequently improving the number of minority ethnic artists applying, especially those where English is a second language,

- Urge national agencies to work with funded arts organisations and artists from minority ethnic backgrounds to share learning and best practice on culturally diverse arts practice; to build partnerships with artists from minority ethnic backgrounds; to interrogate recruitment processes in arts organisations with a diversity lens; and to deliver audience development initiatives,

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[29] Traveller suicide rate is 6 times higher than the general population and most common in young Traveller men aged 15-25 (- All Ireland Traveller Health Study (2010). However, Traveller suicide data is not included in national collection figures. Community information indicates a steep increase in the last 5 years particularly among young people and most recently young women

- Create effective information-sharing channels to communicate with young artists from minority ethnic backgrounds about available resources that would support the development of their creative practices and careers, including funding; physical resources (such as spaces to rehearse and create work, equipment etc.); opportunities to exhibit, present and perform work; and training and education,

- Develop peer-networking and continuous learning opportunities that embody a vision of the arts sector as an open community and explore the provision of national and regional forums, art-form specific peer-support groups and distance/online seminars or discussions.

13.   Representation and Participation at Local and National level policy development

Recommendation: Create safer spaces and opportunities for the lived experience of young people to inform policy and practice.

Safer spaces involve:

- Develop responsive, inclusive and diverse practice that puts young people's needs central, that is based on creating participation spaces that are developed in dialogue, co-design and collaboration and on minority ethnic young people's own terms,

- Supporting peer-facilitation skills development to create the best conditions for representation and participation,

- Supporting spaces where skills are fostered and developed to build the capacity of young people for meaningful participation in decision-making space such as NYCI's Young Voices programme[30],

- Resources dedicated to youth work responses that support skills progression for minority ethnic young people on the process of informing [31][OBJ],

- Breaking cycles of disadvantage through initiatives that recognise the lived reality of minority ethnic young people, for example, using text reminders with minority ethnic young people as a tried and tested way to improve attendance and engagement,

- Developing a Think Tank/ campaign strategy on how to communicate the complexity of what it is to belong and to feel safe and supported to participate and contribute.

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[30] This is Young Voices-A Model of Youth Democratic Engagement. (NYCI, 2021, unpublished).
[31] The No Shame/Good Nuck Mental Health campaign developed by Involve Meath, a Traveller specific youth organisation, following engagement with *Young Voices*, is an example of what is possible by creating space for such initiatives.   This corresponds with recommendations on advocacy and leadership identified in Make Minority a Priority.

14.   Access to Services

> *"A translation error or mistake could have devastating consequences for my whole family. It's high pressure thinking. Having to think like an adult means that you somehow lose your childhood."*
>
> *"You prepare to be disappointed".*

Recommendation: **Initiatives to improve access to services for minority ethnic young people include: developing a code of practice for services and businesses; delivering cultural competence and awareness raising education; applying Public Sector Duty reform; developing forms of redress when rights are withheld or compromised[32].**

Key to improving access to services for minority ethnic young people is to understand the lived experience of minority ethnic young people in accessing services to date.

On the need for cultural competence education, codes of practice and Public Sector Duty:

- Ensure an end to discrimination by building understanding of minority ethnic young people's lived experience of services. Minority ethnic young people describe feeling worried and anxious even before accessing services, especially healthcare, as they had experienced discrimination in the past and were fearful of the reaction of those in positions of power. Young people speak to us about service providers serving other people before them, even if they are next in line.

On rights:

- Minority ethnic young people who are followed in shops (most often black young men, Travellers and Roma) should have a right of redress,

- Minority ethnic young people who are denied access to restaurants, bars, nightclubs, hotels, etc. (most often black young men, Travellers and Roma) should have the right of redress including sanctions for offending businesses,

- Ensure the right to interpretation services for justice, medical, immigration related, financial and other sensitive and private services. Minority ethnic young people have the right not to have to translate/interpret inappropriate information for parents and guardians.

On access to youth work services:

- Funding, resourcing, developing codes of practice, cultural competency education and creating culturally diverse volunteer and staff youth worker teams are all necessary to enhance youth work's capacity to make a real and lasting positive

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[32] See *Ireland and the Convention on the Elimination of Racial Discrimination: Submission to the United Nations Committee on the Elimination of Racial Discrimination on Ireland's Combined 5th to 9th Report*, IHREC (2019).

difference in minority ethnic young people's lives. Supporting initiatives that NYCI has taken a lead on are critical – such as its global and racial justice approach to awareness raising, its roll out of transformative practice that works with young people who perpetrate racism, and its commitment to growing its impact through outreach and building a network of anti-racism champions.

Conclusion

Racist and anti-migrant narratives are becoming more mainstream, the rise of far-right politics and the spread of hate speech and false information threaten democracy and our values of human rights, equality, solidarity, and sustainability.

However, growing racial and social justice movements are seeking change. Informed and engaged young people are confronting injustice and demanding a better world. The opportunity that this new National Action Plan Against Racism brings to tackle these important issues cannot be overstated.

Our submission has highlighted a significant number of issues – each one too important to encapsulate into a smaller set of recommendations. If we are to provide better outcomes for current and future generations of young people in Ireland, then we must ensure the issue of racism and racial justice is addressed and tackled through a strong, fully funded, plan that gets fully implemented.

We look forward to collaborating on the delivery of the new National Action Plan Against Racism for Ireland.

It seems fitting that our last words are left to minority ethnic young people who were asked to imagine Ireland in 2030. We share their ambition that these become the reality for our young people.

Ireland 2030

> *"Diversity and inclusion training is now mandated for all government bodies"*

> *"Quotas are removed as equality is achieved in Ireland - the most diverse group of politicians ever in the 36th Dáil in Leinster House"*

> *"Statistics of high-level executives reflect Ireland's diverse populations"*

> *"Ireland's first Black president is appointed"*

Video Resources

NYCI (2020), Introduction to Racial Justice, Youth 2030 Programme - Racial Justice - An Introduction - YouTube