

Catherine Day Group

1 Background

In late December 2019, the then Minister for Justice and Equality, Charlie Flanagan T.D., and his colleague the Minister of State for Equality, Immigration and Integration, David Stanton, T.D., announced the establishment of the Expert Group on the Provision of Support, including Accommodation, to Persons in the International Protection Process (Asylum Seekers). This Group is Chaired by Dr. Catherine Day.

2. Purpose of this paper

On 16 July 2020 an email was received from the Secretariat of the Advisory Group AG requesting the observations of the relevant areas of the Department of Education and Skills DES on a number of draft education recommendations that the AG is considering as part of a package of support for applicants for International Protection IP and those with status.

Following feedback received from the DES, the email outlined the expectation that the Chair will be asked to consider a Zoom meeting to discuss the issues with relevant areas of the Department of Education and Skills. It should be noted that following the transfer of certain functions to the newly recently established 'Department of Further and Higher Education, Research, Innovation and Science', the Chair will now need to engage with representatives of both Departments i.e. the DES and the DFHERIS.

The following list of statements were forwarded by the AG for observations. Both Departments would welcome an opportunity to explore their context and meaning. Some statements e.g. 'access to mainstream primary and post-primary schools on same basis as Irish nationals' outlines the current nature of education provision for all children who reside in this State including provision for children of international protection applicants.

STAGE 1 – Reception Process

- All applicants to partake in reception process, including 3 months accommodation in reception centre for those who need it. Possible educational supports during reception process to include (to be discussed with DES)

Orientation	A) Language Training and Cultural Orientation programme provided by ETB's - tailored programme including language skills and information on rights and entitlements, the Irish education system, employment and life in Ireland. Services and crèche facilities are available to ensure adult refugees can participate in the orientation programme. B) Regular clinics held by DJE staff (including IPO) in reception centre to discuss needs and requirements of applicants C) Social services worker to work with families during their time in the centre and to include preparation for life in Ireland
Education - Primary & Secondary	A) Induction programme including language supports for children to prepare them for mainstream education. B) Access to mainstream primary and post-primary schools on same basis as Irish nationals.

STAGE 2 – While awaiting decision

- Provision of own door accommodation to applicants through HAP/AHB's/LA's. Possible educational supports during stage 2 to include (to be discussed with DES)

Education - Primary & Secondary	Access to mainstream primary and post-primary schools on same basis as Irish nationals.
Education - Tertiary	A) School leavers who have been in the protection system for 3 years and meet certain criteria can apply for student supports. (supports in line with the current SUSI Student Grant Scheme). B) Third Level Scholarships provided by third level institutions on a case-by-case basis.
Education - Vocational	Access to vocational training on the same basis and extent as Irish Nationals, including further education and training (FET), apprenticeships and Vocational Training Opportunities Scheme (VTOS). Access to vocational training not dependent on applicants holding valid Labour Market Access Permission. Reduced rate fees for PLC courses.
Integration Support	A) Resettlement worker assigned to assist with transition and full-time integration support throughout application period with social care experience. (provided and funded through Local Authority). B) English language and training (100 hours) over a period of one year to 18 months, organised by local ETB. Childcare available to those who attend.

Stage Three – once a positive decision has been taken

- Educational supports same as Irish citizens at all levels

Stage Three – where a final negative decision has been taken

- Educational supports to continue for 3-6 months

Feedback from the Department of Education and Skills

3. Information note on Primary and Post-Primary Education for children of applicants for international protection

3.1 It is important to note that children and young people residing in accommodation centres currently have access to mainstream primary and post-primary schools on same basis as Irish nationals.

The education system in Ireland is underpinned by a policy of inclusion, where children, including migrant children attend mainstream schools and additional supports are allocated on the basis of identified additional educational need.

Children residing in accommodation under the system known as 'Direct Provision' are educated within the mainstream education system i.e. children of applicants for International Protection access free Primary and Post-Primary education in the same manner as the general population. Education in Ireland is compulsory from age 6 to 16 or until students have completed three years of second level (post-primary) education, whichever is the later date, under the Education (Welfare) Act, 2000.

The Department of Education and Skills provides a range of supports to schools to meet the educational needs of children and young people in the primary and post-primary systems. These include additional resource teachers, special educational needs supports, National Educational Psychological Service (NEPS), and support and advice from National Council for Special Education (NCSE). Schools participating in the DEIS Programme may also avail of additional funding to support interventions for children at risk of poor educational outcomes by virtue of their socio-economic background, as well as the Home School Community Liaison and School Completion Programmes which are part of Tusla Education Support Service.

Regarding language support, a new model for allocating special education teachers to schools was introduced for all mainstream primary and post primary schools in 2017. The allocations for schools under this model were updated in February 2019 (circular 0007/2019 and 0008/2019). The Special Education Teaching allocation provides a single unified allocation for special educational support teaching needs to each school, based on each school's educational profile, including those arising from English Additional Language (EAL) needs. The model for allocating special education teachers is designed to distribute teaching resources fairly to schools, taking into account the profiled needs of each school, as indicated by a set of key data indicators. The model provides all schools with a baseline teaching allocation to assist current and future pupils who have learning and literacy difficulties, including those arising from English Additional Language (EAL) needs.

In primary schools, the standardised test scores on which part of the profile is based reflects where pupils have literacy problems. In post-primary schools, Junior Certificate examination result data in English and Mathematics represent the literacy and numeracy achievement scores and have been applied in a graduated manner to create a value for each school. The profiled allocation therefore takes account of the extent of literacy needs a schools has, including where these literacy needs arise due to language difficulties. The profiled allocation for schools therefore takes account of EAL needs in schools.

The Special Education Teacher allocation model allows schools to provide additional teaching support for all pupils who require such support in their schools and for schools to deploy resources based on each pupil's individual learning needs. It gives greater flexibility to schools as to how they can deploy their resources, to take account of the actual learning needs pupils have, as opposed to being guided by a particular diagnosis of disability, and schools are guided as to how they should make such allocation decisions.

The Department has published guidelines for schools as to how they should utilize and deploy their resources under the new allocation model, which are available at www.education.ie The guidelines support schools in how they identify pupils for additional teaching support and decide how much support to provide for pupils who need it.

In addition to the above, procedures are in place if schools can demonstrate that they have high concentrations of pupils requiring English as an Additional Language (EAL) support. Schools can lodge an appeal to the Staffing Appeals Board for a review of staffing allocation for EAL support in accordance with the procedures set out in the primary (0018/20) and post primary (0013/20, 0014/20, 0015/20) school staffing schedule circulars. Schools can avail

of the assistance and or advice from the Inspectorate or NEPS if they require advice on assisting children with EAL in the classroom.

The Department's National Educational Psychological Service works through a problem solving and solution oriented consultative approach to support schools to identify and meet the needs of individual pupils. NEPS psychologists can provide advice and guidance to Principals and teachers in relation to individual students' needs and in the development of whole school approaches to support inclusion, participation and integration. In addition, NEPS psychologists support schools to implement early-intervention and prevention programmes, such as The Incredible Years Programme in Primary Schools and resilience building programmes, such as the FRIENDS Programmes at Primary and Post Primary levels. Schools that may have concerns in relation to the social, emotional or educational development of any of their pupils can raise these issues with their assigned NEPS psychologist with a view to the psychologist becoming directly involved with the pupil, where appropriate.

Children resident in accommodation for international protection applicants are assisted to apply for school transport under the School Transport Scheme operated by Bus Eireann on behalf of the Department of Education and Skills DES.

IPAS has an official seconded from the Department of Education and Skills DES who acts as a liaison between RIA, schools, centre managers, the DES and its agents and TUSLA Education Support Service (TESS), who assist in finding school places, where necessary.

Applicants for International Protection who are living in State provided accommodation are medical card holders and, inter alia, their children are exempt from the fees for State examinations (the Leaving and Junior Certificate).

They can avail of the Back to School Clothing and Footwear Allowance, which is administered by the Department of Employment Affairs and Social Protection DEASP.

3.2 The National Migrant Integration Strategy

On a broader level, The National Migrant Integration Strategy (MIS), 2017-2020, is a whole-of-Government approach involving actions by all Departments and relevant Agencies. The education actions outlined in this Strategy, focus on enabling students to experience an education respectful of diversity while assisting education providers to ensure that integration becomes the norm within an intercultural learning environment. The Department of Education participates in the National Steering Group which oversees the implementation of the Strategy.

3.3 The Department of Education and Skills Action Plan on Bullying

The Department of Education and Skills Action Plan on Bullying published in 2013 sets out a comprehensive approach to tackling all forms of bullying, including *identity based bullying*, and to promoting positive, inclusive environments in all schools. Actions focus on support for schools, teacher training, research and awareness raising and aim to ensure that all forms of bullying, including identity based bullying, are addressed. The procedures acknowledge that while bullying can happen to any pupil, it is known that some may be more vulnerable to or at risk of experiencing bullying. The procedures include a number of specific measures in respect of identity-based bullying including a requirement on all schools to have in place education and prevention strategies that explicitly deal with identity-based bullying.

Implementation of Wellbeing Policy

Also supporting the core recommendations of the Action Plan on Bullying, this Department developed and published the Wellbeing Policy Statement and Framework for Practice in 2018. Placing a national focus on wellbeing in education, it seeks to ensure that every child and young person realises their full potential now and in the future, and is able build resilience and deal with the challenges they face. It builds on the good work already happening in schools and centres for education to ensure that best practice in whole-school/centre wellbeing promotion is embedded across the system. This policy requires that a Wellbeing Promotion Process is developed and implemented, through the use of the School Self-Evaluation (SSE) process, in all schools by 2023. It is the Department's ambition that the promotion of wellbeing will be at the core of the ethos of every school and centre for education throughout the country

3.4 Teacher Education

Under Section 38 of the Teaching Council Act, initial teacher programmes are subject to review and accreditation by the Teaching Council, for registration purposes. Inclusive education (including Multiculturalism, Disadvantage and Special Education) is a mandatory area of study for all student teachers who are undertaking programmes of initial teacher education at primary and post primary levels in Ireland, in accordance with the Teaching Council's Criteria and Guidelines.

3.5 Draft Catherine Day Recommendations of relevance to Primary and post-primary education

Children of applicants for International Protection access free Primary and Post-Primary education in the same manner as the general population. Representatives from the Department of Education and Skills would welcome an opportunity to discuss the recommendations regarding access to primary and post-primary education for children of international protection applicants. The paper would appear to be recommending what is already a statement of fact.

In relation to the recommendation "*where a final negative decision has been taken - Educational supports to continue for 3-6 months*", there is no link between legal status and access to primary and post-primary education. All children access education regardless of their legal status in this State. In this regard the paper would appear to be recommending what is already provided.

With regard to the recommendation "*Induction programme including language supports for children to prepare them for mainstream education*" it is not considered feasible to establish additional education provision outside of the mainstream system. Each school has access to resources to support induction of individual children dependent on an individual child's needs and in line with the DES continuum of support.

Feedback from The Department of Further and Higher Education, Research, Innovation and Science.

4. Overview of the Pilot Support Scheme for Persons in the Protection Process or Leave to Remain

Persons in the protection process (asylum and subsidiary protection) or leave to remain process are not eligible to access the statutory based SUSI grant scheme. However, the administratively based Pilot Support Scheme provides supports along similar lines to the SUSI grant scheme and is available to persons in the asylum, subsidiary protection or leave to remain process.

To qualify for the pilot scheme, prospective students have to meet a number of criteria, including a requirement to:

- Meet the definition of a protection applicant or a person at leave to remain stage (other than those at the deportation order stage);
- Obtained their Leaving Certificate;
- Have been accepted on an approved Post Leaving Certificate course or an approved undergraduate course; and
- Have attended a minimum of three academic years in the Irish school system and have been part of an application for protection or leave to remain for a combined period of 3 years prior to the 31st of August of the first year of their course.

4.1 Residency Requirements of Pilot Support Scheme 2020

The three year requirement was originally set at five years. However, a decision was made in 2019 to reduce the residency requirement to three years. The three year requirement aligns it more closely with the SUSI grant scheme which has a three out of five year residency requirement.

The slight differences in the residency requirements between the two schemes reflect the different nationality status for prospective applicants to each scheme i.e. asylum applicants cannot travel freely pending a decision on their application whereas Irish nationals are free to travel within the EU and to other countries which have reciprocal visa/visa waiver arrangements with the State such as the USA and Australia.

Consideration of the residency requirements for the Pilot Support Scheme has to be considered in the context of the statutory residency requirements that apply to the Student Grant Scheme for Irish, EU, EEA, Swiss nationals and persons with other eligible permissions such as refugees, persons with subsidiary protection status or granted leave to remain. The details of the statutory scheme are set out below.

4.2 Residency Requirements of the Student Grant Scheme 2020 (aka the SUSI grant scheme)

Applicants attending an approved course in an approved institution who meet all of the prescribed conditions of funding, including those relating to nationality, residency, previous

academic attainment and means, may be eligible for support under the Student Grant Scheme.

With regard to residency, in order to be eligible for a grant, a "*student*", as defined in Section 14 of the Student Support Act 2011, must demonstrate that s/he has been resident in the Irish State for at least 3 years out of the 5 year period ending on the day before the start of his/her approved course of study.

The terms and conditions of funding are applied impartially to all applicants. All applicants are treated equally with regard to meeting the residence requirement. In all cases, the residency requirements must be met by the student himself or herself. All students are afforded a degree of flexibility by means of having to meet a "3 out of 5 years" requirement (rather than more restrictive requirements operating in other countries which may apply a definitive date by which a consecutive period of study must be met).

4.3 Rationale for the Residency Requirements in the Student Grant Scheme

The residency requirements of the Student Grant Scheme seek to ensure that those applying for a grant assistance will have a more established linkage with and integration into the State, a concept recognised in EU law and accepted across the EU.

The residency requirements are also designed to obviate the risk of 'grant tourism' under which people might come to study in Ireland because of the relatively generous grants system. Higher Education courses provided in English are particularly attractive to international students and Ireland is about to become the largest English speaking country in the EU post-Brexit.

The requirement for three out of the past five years takes cognisance of and provides a degree of flexibility for students who may wish to take time out to travel or work outside the State. These students can still meet the residency requirement if they have not been outside the State for more than two of the previous five years.

It is important to note that similar or more restrictive residency requirements apply in other EU Member States, including the United Kingdom. For example, in the UK a student must be resident for the three years prior to commencing his/her studies. To be eligible for support in Northern Ireland, a student must be resident in the UK, the Channel Islands or the Isle of Man for the three years immediately before the relevant date (the first day of the first academic year of the course). A similar provision applies in both Scotland and England.

In Denmark an applicant for State education support has to have resided in Denmark for a continuous period of at least 5 years prior to commencing studies and in the Netherlands EU citizens require 5 years consecutive residency to qualify for support. In Austria, EU nationals are eligible for a study grant, if they are migrant workers, or a family member of a migrant worker and there is a 5 year residency requirement for non EU nationals. In Belgium students from Developing countries and Territories must have 5 years residency in Belgium with their family and to have completed 5 years of studies in Belgium.

4.4 Catherine Day Recommendations

Any proposals which may affect criteria such as nationality or residency may be problematic and the implications considered both within the State and in terms of approaches by other Member States and the UK post 1 Jan 2021.

There are potentially three issues listed below which may affect HE provision:

- 1) School leavers who have been in the protection system for 3 years and meet certain criteria can apply for student supports. (supports in line with the current SUSI Student Grant Scheme).
- 2) Third Level Scholarships provided by third level institutions on a case-by-case basis.
- 3) Stage Three – where a final negative decision has been taken - Educational supports to continue for 3-6 months

The first item is fine as it is simply reflecting the current position regarding the Pilot Support Scheme. The second item is a matter for individual HEIs who are autonomous bodies; provided that the 'scholarships' are funded by the HEIs and not the Exchequer. The third item may be problematic, depending on what is defined as 'educational supports'. If somebody has been issued with a "final negative decision" then presumably the next stage is deportation. To propose that we would continue to provide HE supports for a further 3-6 months would for example require changes to the Pilot Support Scheme; so that grant support could continue after a person has exhausted all options to remain in the State.

Free Fees Initiative:

One immediate issue with reviewing the suggested items is the lack of clarity about what a 'positive decision' means.

Nationality: Currently students holding permissions based on those granted through the International Protection system would only meet the nationality criteria of the free fees scheme where the permission is specified in law as providing the same entitlements as an Irish or EU citizen. It is understood to be the case that it is possible for a person to be granted a permission to remain in the state under a permission that does not provide the same entitlements as an Irish citizen under Irish or EU law. Therefore a policy decision not underpinned in law could inadvertently provide for supports to be offered without a legal entitlement. It could also open up the scheme to challenge by other non EU nationals.

Residency: The issue of residency is also a significant consideration. Under the free fees scheme all students, including Irish citizens are required to be ordinarily resident in an EU state for 3 of the previous 5 years prior to entry to their course of study [with limited exceptions such children of DFA diplomats].

Should a 'positive decision' be taken in advance of an applicant having legal residency of three years they would not be eligible for funding without a change to the scheme requirements for all applicants. A fundamental change in residency criteria could impinge on the ability of the Free Fees Initiative to achieve its objectives as it would create new entitlements for persons outside the intended beneficiaries of the changes. This could create a significant problem at a time of anticipated increasing demographic pressures within the existing criteria.

To note: In terms of free fees there are two schemes in operation. The older Middle Level Technician/Higher Technical and Business Skills programme (MLT/HTBS) [which was in existence prior to the introduction of the FFI, provides for free tuition fees for students undertaking level 6 and 7 courses in the Institutes of Technology] and the Free Fees Initiative (FFI) [which covers the cost of tuition fees at the EU rate of fee for Level 8 courses in Institutes of Technology and level 6, 7 and 8 courses in Universities and other approved HEI's]. There is variance in the schemes where by the MLT/HTBS programme did not include a residency requirement. A residency requirement is referenced in the most recent version of the MLT/HTBS programme, however the terms are not clearly stated as 3 out of 5 years. This is something will need to be regularised when the criteria for free fees or other access criteria to HEI is updated. The position as it is understood is that the sector typically require the 3 out of 5 years criteria to be met.

Fee rates:

Where students are not eligible for free fee funding, with the exception of those reference in the 2014 request the fee rate is decided upon by the HEI as an autonomous body.

Further Education and Training

5. Access to Further Education and Training Programmes for Migrants

Non-Irish nationals in the following categories are entitled to free access to further education and training programmes on the same basis as Irish nationals:

- EU nationals;
- persons who have refugee status in Ireland;
- persons in the State as the spouse of an EU national, where the EU national has moved from one country to another within the EU to work;
- persons (including their spouse and children) who have been granted leave to remain in the State on humanitarian grounds;
- persons who have permission to remain in the State as the parents of a child born in Ireland;
- international protection applicants who have been granted permission to work under the terms of the EU (recast) Reception Conditions Directive (2013/33/EU)

Asylum seekers who do not have an entitlement to work are entitled to free access to adult literacy, English language and mother culture supports only.

Eligibility for FET for migrants is also dependent upon more than just Permission Stamps and Work Permission documentation. Courses in general (aside from English for Speakers of Other Languages - ESOL) may require a level of competency in spoken and written English and applications for Post Leaving Certificate (PLC) courses hold specific educational or vocational requirements for entry.

5.1 Beneficiaries and Funding 2019 – ESOL and Refugee Resettlement Programme

An analysis of the data on reported beneficiaries and expenditure for ESOL and Refugee Resettlement indicates that 15,397 beneficiaries availed of ESOL while 1,196 beneficiaries availed of Refugee Resettlement Programme. The projected figures for 2019 are 17,936 and 1,158 respectively.

The combined funding allocation for ESOL and Refugee Resettlement was reported as €5,332,474 with a combined beneficiary total of 16,593. The projected figures for 2019 are €6,200,478 and 19,094 respectively. Numbers of beneficiaries availing of such programmes varied between ETBs, with the greatest participation concentrated in ETBs catering for large urban populations.

5.2 Refugee Resettlement Programme – 20 hours tuition

Within the Refugee Resettlement Programme participants are entitled to provision of up to 20 hrs per week in the first year of resettlement. Where refugees are resettled ETBs will offer up to 20 hrs per week. Not all refugees are ready for 20hrs of tuition on arrival and ETBs will adopt flexible modes of delivery while ensuring that all participant's need are being met.

There may be variation in the amount of hours on offer and this can occur for a number of reasons:

- 20 hrs per week is too much for many refugees - they are settling into a new home, children are in new schools, the environment and community are all new to them
- Some ETBs may use a 'banking system' where those who are capable of attending 20 hrs per week will be offered 20 hrs but for those whose language skills are particular weak or they are illiterate in their own language it is necessary to take a slower approach to build competency and increase tuition hrs over time.
- Additional support classes e.g. 1:1 tuition is also on offer and is availed of by learners with very weak language skills/literacy difficulties in their own language. This can be more beneficial for these learner
- Learners with good levels of competency may also be offered additional tuition to increase their levels of competency in a shorter period of time
- Pregnant women, breast feeding mothers and those with small children frequently experience difficulty in attending extensive tuition
- Progress in some instances can be slow due to learners not using the language outside of class time

When learners move from reception centres/direct provision they are entitled to the full suite of programmes on offer in the ETB. For those moving from one ETB to another they would be provided with contact details/person within the local ETB. If they are moving to another ETB area, the new ETB would be contacted at the request of the learner. This could be done by Centre Managers of Guidance Service.

5.3 Implementation of the EU (recast) Reception Conditions Directive (2013/33/EU)

Legislative Change - implications for International Protection Applicants

Until February 2018 International Protection applicants had not been permitted to work in Ireland until the first instance outcomes of their applications were delivered. There has been a change in legislation due to the opting in of Ireland to the EU (recast) Reception Conditions Directive (2013/33/EU) which lays down standards for the reception of international protection applicants.

Since Ireland's opt in to the directive in July 2018, eligible international protection applicants can now apply for access to the labour market by way of permission to work through the Employment Permits Online System (EPOS) system.

This permission allows access to employment and self-employment and is valid for six months. It may be renewed if the applicant has not received a final decision (i.e. after any appeals) on their protection application within this timeframe. Eligible applicants will have access to all sectors of employment, with the exception of the Civil and Public Service, An Garda Síochána, and the Irish Defence Forces.

Permission to access the labour market may also allow for access to further education or training (FET) courses.

Eligible applicants will have access to all further education and training programmes, which will now include access to Apprenticeships and Vocational Training Opportunities Scheme (VTOS).

Access to PLC provision will be subject to the payment of the full economic fee as set out in the Department's circular letter dated 27 September 2001

https://www.education.ie/en/Schools-Colleges/Services/Further-Education-and-Training/Post-Leaving-Certificate-PLC-Programme/fe_non-nationals.pdf

Eligibility to participate on these programmes on the basis of permission to access the labour market will be verified by the relevant Education and Training Board (ETB) by the production of the applicant's labour market permission letter from the Department of Justice and Equality.

It should be noted that there is no right to a place on any particular programme, applications from protection applicants are assessed according to the programme guidelines in the same way as other applications.

5.4 Guidance

With the exception of those applicants referred to specific provision via INTREO under the management of a case officer, support and guidance will be available to each eligible applicant to the Adult Guidance Service on the most suitable available FET provision to meet the needs of the applicant.

5.5 Catherine Day Recommendations

The Department of Further and Higher Education, Research, Innovation and Science is generally supportive of the recommendations relating to the further education and training sector set out in the email from the Secretariat of the AG.

In relation to recommendation A under Orientation, it should be noted that, along with English language supports, existing supports are already offered by ETBs to adult refugees around information on rights and entitlements, the Irish education system, employment and life in Ireland under the D/Justice funded Refugee Resettlement Programme.

An English Language and Orientation for Resettlement/Relocation Refugees programme has been specially devised to support the transition of Resettlement or Relocation Refugees to their new communities in Ireland by providing information and guidance on the practicalities of living in Ireland through a programme of basic English language tuition. Following relocation to new communities, all adult learner refugees are offered a specific period of English language training up to the achievement of a functional conversational ability of the English language. Residents coming from EROC centres are referred to the Refugee Resettlement Programme. Through the Adult Education Services and in particular ALO and Guidance Services their language skills are assessed using CEFRL. They are then referred to an appropriate programme based on the outcome of their language assessment and avail of up to 20 hours of tuition per week for a period of one year. Following the completion of this year, they are mainstreamed and can avail of all adult education programmes.

If a similar orientation programme for international protection applications was to be developed and provided by ETBs, consideration would need to be given to the associated costs and resource implications. Existing resources for 2020 are already allocated so additional funding would need to be found to cover these additional costs.

The Department is supportive of committing to 100 hours of English language provision over the period of the first 18 months of an international protection applicant's residence in Ireland. It should be noted that provision needs to be at an intensity that supports language acquisition. English language classes vary in duration from 2- 6 hours per week depending on availability of learners to attend and budget restrictions.

The recommendations include the following provision while awaiting a decision 'Access to vocational training on the same basis and extent as Irish Nationals, including further education and training (FET), apprenticeships and Vocational Training Opportunities Scheme (VTOS). Access to vocational training not dependent on applicants holding valid Labour Market Access Permission. Reduced rate fees for PLC courses'.

Currently, international protection applicants who are awaiting their decision have access to adult literacy and English language supports only in further education and training. When an international protection applicant receives a positive decision, they then have the same access to further education and training as an Irish citizen. There are cost and resource implications arising from this recommendation. Existing resources for 2020 are already allocated so additional funding would need to be found to cover these additional costs.

While the Department is supportive of the recommendation to allow international protection applicants the same access as an Irish citizen without the need for a labour market access decision, as stated previously, consideration needs to be given to the cost and resource implications of this. Existing resources for 2020 are already allocated so additional funding to cover this would need to be found to cover these additional costs.

The majority of further education and training is free of charge. However, international protection applicants do have to pay the full international fee to participate in PLC courses.

We are supportive of the recommendation to offer a reduced rate for participation in PLC courses for international protection applicants.

While the Department is supportive in principle in relation to having childcare / crèche facilities available, ETBs would not be a position to provide childcare / crèche facilities for children of international protection applicants. This will have to be done through other budget lines.'

ENDS